


From: [Chris Hagerbaumer](#)
To: [Columbia River Crossing](#) 
CC:
Subject: OEC comments on CRC DEIS
Date: Tuesday, July 01, 2008 4:41:55 PM
Attachments: [OEC Comments on CRC DEIS.pdf](#)

Friends,

Attached are comments from the Oregon Environmental Council's Board of Directors on the DEIS.

Thank you for your hard work to date, and we look forward to a response.

Chris Hagerbaumer | Deputy Director
Oregon Environmental Council
222 NW Davis Street, Suite 309
Portland, OR 97209
503.222.1963 x102
chrish@oeconline.org | www.oeconline.org

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Oregon
Environmental
Council
It's Your Oregon

222 NW Davis Street
Suite 309
Portland, OR 97209-3900
503.222.1963
www.oconline.org

Columbia River Crossing
700 Washington Street, Suite 300
Vancouver, WA 98660

July 1, 2008

RE: I-5 Columbia River Crossing Draft Environmental Impact Statement

Dear CRC Project Team:

The Oregon Environmental Council (OEC) appreciates the tremendous amount of work the project team has put into studying how to address transportation problems associated with crossing the Columbia River between Portland and Vancouver and producing a Draft Environmental Impact Statement (DEIS) that analyzes four build alternatives and a no-build alternative for the proposed Columbia River Crossing (CRC).

OEC works to protect people and the environment on many levels, including slowing global warming and improving air and water quality. We offer some observations below on the Columbia River Crossing in general and the DEIS specifically that are informed by our understanding of the interrelationship between transportation, land use and the environment. We believe a well designed and implemented Columbia River Crossing can achieve the economic, environmental and social goals that are essential to sustainable transportation.

OEC acknowledges and agrees that congestion on the I-5 bridge has serious repercussions for our local, regional, and national economy. Environmentally sound and efficient transportation options are important for all travelers crossing the river. In particular, alternative transportation modes and freight movement need to be addressed. In short, we agree that both states have a large stake in making safety and seismic improvements to the bridge, improving freight mobility, and providing citizens with reasonable access to the places they need and want to go.

The big question is exactly how to accomplish this, and how to do so in a way that meets other important societal goals. As always, the devil is in the details.

In 2007, the Oregon Legislature passed HB 3543, which requires that Oregon halt the growth of its greenhouse gas emissions by 2010. By 2020, Oregon must have achieved a reduction of at least 10% below 1990 levels, and by 2050 a reduction of at least 75% below 1990 levels, in line with the recommendations of the Intergovernmental Panel on Climate Change. Given that the transportation sector is responsible for about 38% of Oregon's greenhouse gas emissions and about 45% of Washington's greenhouse gas emissions, any future transportation investments must put both states on a path toward real progress in reducing global warming pollution. Doing anything less would be a colossal mistake with wide repercussions for our region's future livability and economic strength, as well as the health of the entire planet.

We appreciate the fact that the project team recognizes the need to address global warming. We note that the DEIS describes a number of measures to mitigate the project's impact on our climate. However, looking through a global warming lens, we believe the region has more work to do before adopting a CRC project that would build six lanes in each direction. We do not believe an adequate range of alternatives has been assessed in the DEIS. Specifically, we believe that a "global warming" alternative (or alternatives) needs to be added in the Final EIS. Such an alternative(s) would specifically address the following six points related to global warming and other critical issues:

1. Oil prices hit a record high this June, and gas prices are averaging \$4 a gallon nationwide. These high prices at the pump are changing drivers' behavior. For example, as reported in the Wall Street Journal on May 30, 2008, riders are swamping public transit. The fact is: oil is a finite resource, and if the world has not already reached peak production of oil, it certainly will during the early lifetime of this project. In other words, the trend toward higher gas prices and greater changes in driver behavior is here to stay. With this in mind, OEC believes we need a new analysis of traffic demand in the corridor before making any decisions about the CRC. This analysis should take into account that cars may be fueled with something other than petroleum fuels; but even under an alternative fuels scenario, we believe it is highly unlikely that there will be as many auto trips as the current analysis indicates. If fewer auto trips are expected, fewer lanes can be built.

2. OEC agrees with OTC Commissioner Gail Achterman's assertion in a letter posted on the CRC website that it is unrealistic for a single project to bear the responsibility for needed greenhouse gas reductions and that we will only achieve this goal through system-wide policy changes. To us, this statement underlines the point that the CRC proposal needs to be evaluated in a broader context. For example, given that the project assumes increased VMT, as described in the DEIS, what assurances do we have that the region will reduce VMT elsewhere in order to meet our greenhouse gas goals? Thus decisions about the CRC should be made in the context of the Portland Comprehensive Plan and the Regional Transportation Plan updates that are both underway. The CRC also needs to demonstrate a new transportation paradigm in response to the Governor's transportation and global warming initiatives.

3. The CRC's impact on future land uses must be evaluated. We are concerned that easier access to jobs in Portland will fuel unchecked growth in Clark County, leading to greater sprawl and more vehicle miles traveled. However, if Clark County commits to economic development policies that provide more job opportunities to local residents and growth management policies that inspire compact urban development, these fears would be allayed. The analysis should outline Clark County's commitments to smart growth.

4. It strikes us that the "Bridge Influence Area" described in the DEIS is too small. Changes to traffic movement on I-5 will greatly influence traffic further south on I-5 (for example making the bottleneck at the Rose Garden even worse), and the interconnectedness between the I-205 bridge and I-5 bridge cannot be understated. The Bridge Influence Area should be expanded so that decision makers have a better understanding of the relationship between this project and other bottlenecks in the region.

5. A more in-depth analysis of the air quality impacts of the project is warranted. While the DEIS notes that none of the alternatives being proposed are expected to violate federal or state standards for criteria air pollutants or hazardous-air pollutants, scientific evidence is growing that air pollution harms people at levels even lower than the current federal maximum allowable levels and that air pollutants do not act in isolation, but rather cumulatively. It is important to the health of residents of the region and to those who live in close proximity to I-5, in particular, that we choose the project design resulting in the least amount of air pollution. This is an environmental justice issue as well as a health issue given that the project is located near neighborhoods with a high proportion of lower-income residents and people of color. OEC therefore encourages project design that foresees and adheres to stricter standards than current federal requirements. Lower maximum allowable levels are likely to be adopted in coming years because of emerging scientific evidence.

6. We would like to see a more thorough analysis of how freight mobility will be improved with a refigured corridor. Goods movement is essential to the region's economy, but inefficiencies in the system are impacting our climate and harming our environment. Nationally, freight movement is responsible for approximately 20% of the transportation sector's CO₂ emissions. As mentioned in the DEIS, truck-hauled freight in the Portland-Vancouver region is forecast to grow from 67% of total freight movement in 2000 to 75% in 2035. In order to reap positive economic and environmental effects, the project must improve truck mobility, and this should be accomplished in part by increasing freight rail capacity.

7. Finally, given the price tag of the project, OEC is concerned that funding a project this large comes with huge opportunity costs. We recognize that a certain portion of the expected funding for the project will not be available to the region for anything but the bridge, but a good portion of the funds needed will come from citizens on both sides of the river and could negatively impact the region's ability to preserve the roads we already have and fund other transportation and environmental solutions in the region. Our sense is that the realized costs by taxpayers in the region will be significant – so significant that public support will be difficult to achieve. We urge a more in-depth analysis of how the state and local match will be achieved and how spending on the CRC will impact the region's ability to fund other transportation improvements.

OEC suggests that peak period pricing be applied to both the I-5 and I-205 bridges in advance of building additional lane capacity. We recognize there are political barriers to tolling and valid concerns about equity, but doing so could successfully relieve congestion in an equitable, cost-effective manner and would demonstrate how much additional lane capacity, if any, is needed.

OEC would also support a phased approach that focuses initially on alternative transportation to assess the need for capacity increases. No matter what the size and scope of the final project, OEC strongly supports inclusion of the following into the CRC:

- Robust transit options. Transit improves mobility for seniors, people with disabilities and people with limited incomes.

- ❑ Adequate bike and pedestrian access, as recommended by the Pedestrian and Bicycle Advisory Committee and the Bicycle Transportation Alliance. Non-motorized options are far less expensive for households and help people get the exercise they need to stay healthy.
- ❑ Significant investment in transportation demand management. TDM is a highly cost-effective way to reduce single occupancy vehicle travel.
- ❑ A dedicated freight lane. The project must adequately address freight movement in the region.
- ❑ Peak period pricing on both the I-5 and the I-205 bridges. Price signals are the most economically efficient way to manage demand.
- ❑ Green infrastructure design that will preserve water quality and hydrology across the entire area impacted by the project.

Transportation decision-making has become far more complex than in the past because society now recognizes that there are many unintended consequences associated with a primarily road-based system. We appreciate the work of the project team, and we believe the CRC could be an exemplary model for how to achieve global warming goals while providing for passenger and freight mobility. However, our sense is that the CRC could fail to win public support because of its tremendous costs and the potential deficiencies described above. Because we believe serious transportation needs exist in this corridor, we ask for further analysis not to derail the project, but to improve project assessment and design and thus project acceptance. Convening an independent panel to review the analysis would also help with public acceptance.

While OEC's comments address several questions and concerns about the current design of the project, we want you to know that our organization is excited about the prospect of a CRC that is a model for sustainability. We fully expect the region to be able to devise a crossing that meets the economic, environmental and social goals of the 21st century, and we greatly appreciate your continued work to ensure that it does.

Sincerely,



Cheryl Koshuta, Board President on behalf of the Board of Directors

cc: Columbia River Task Force
 Oregon Transportation Commission
 Metro Council
 Portland City Council
 Multnomah County Commission
 Sustainable Development Commission
 Matt Garrett, ODOT
 Fred Hansen, TriMet