

**From:** [Sarah Watson](#)   
**To:** [Draft EIS Feedback; Gundersen, Heather;](#)  
**CC:** [Cortright, Bob; Crall, Matthew; Richard Whitman; WARNER  
Chris;](#)  
**Subject:** Comments on the Draft Environmental Impact Statement  
**Date:** Tuesday, July 01, 2008 4:22:26 PM  
**Attachments:** [gundersen.070108..pdf](#)

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Heather -

Please find attached a letter from Richard Whitman of the Department of Land Conservation and Development, regarding the Draft Environmental Impact Statement for the Columbia River Crossing. A hard copy of the letter will also be sent.

If you have any questions, please don't hesitate to contact us.

Thank you.

-Sarah Watson

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# Oregon

Theodore R. Kulongoski, Governor

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July 1, 2008

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Sent via email: [DraftEISfeedback@columbiarivercrossing.org](mailto:DraftEISfeedback@columbiarivercrossing.org)  
[gundersenh@columbiarivercrossing.org](mailto:gundersenh@columbiarivercrossing.org)

**Re: *Comments on the Draft Environmental Impact Statement***

Dear Ms. Gunderson:

The Oregon Department of Land Conservation and Development is pleased to have had the opportunity participate in the planning process for the Columbia River Crossing (CRC) through the InterCEP group. The purpose of that collaborative process has been the early identification of issues that could preclude the CRC from obtaining the necessary permits and authorizations later in the process. Based upon our review of the information to date and of the Draft Environmental Impact Statement (DEIS), we do not see any such issues at this time.

We do, however, have several advisory comments regarding the DEIS. First, we have some procedural recommendations to better integrate the alternative selection process into the land use planning process. Second, there are several policy issues that we recommend be analyzed in the Final Environmental Impact Statement (FEIS).

**1. Clarify the land use decision-making steps for approval of the proposed action described in the EIS, and provide necessary supporting information for these decisions.**

Additional information is needed addressing relevant land use planning requirements as provided for in the Oregon Department of Transportation (ODOT) State Agency Coordination, which is found in Oregon Administrative Rule (OAR) 731-015. The EIS should provide a clear description of what land use decisions will be needed to carry out the proposed action, and provide supporting information so that the Locally Preferred Alternative (LPA) can be readily reviewed by local and regional agencies that need to adopt plan amendments or other land use decisions.

OAR 731-015-0075(2) requires the DEIS to, “identify and address relevant land use requirements in sufficient detail to support subsequent land use decisions necessary to authorize the project.”

Additionally, OAR 731-015-0075(3) requires that ODOT obtain, “all plan amendments and zone changes necessary to achieve compliance with the statewide planning goals and compatibility with local comprehensive plans ... before completion of the Final Environmental Impact Statement”.

Chapter 9 of the Land Use Technical Report mentions the need for an Interchange Area Plan at the state level and various land development permits from the City of Portland. This chapter does not, however, address the process that will be necessary to amend regional and local transportation system plans to incorporate the details of the LPA.

The EIS should include a list of local, regional and state plans that will be need to be amended to incorporate the LPA. This list should include the applicable policies and standards in those plans and findings that the policies and standards are met or will be met by the LPA. The EIS should also include a procedural road map outlining how and when the necessary amendments will be made.

Our review suggests that the following plan amendments are likely to be needed:

- Amendment to the Metro Regional Transportation Plan (RTP) (State Component) to include decisions about mode, function and general location of planned facilities, services and improvements. Currently the Metro RTP indicates only that additional capacity is needed at the Columbia River Crossing, but does not specify mode, function or general location. Amendments to the Metro RTP (State Component) are needed to express specific land use decisions about how that need will be met, the combination of modes that are planned, the function of planned facilities and improvements and their general capacity and location.
- Amendment to the Metro RTP (Federal Component) to include the LPA in the financially constrained project list.
- Other local, regional and state plan amendments or land use actions that will be necessary to carry out preferred alternative – including mitigation measures – such as an Interchange Area Plan. These plan amendments should be described in sufficient detail so that the local government agencies can readily understand what will be required of them.

**2. Include measures, such as congestion pricing, to address transportation needs under the no-build alternative.**

The no-build alternative in the FEIS should include analysis of alternative measures to address the purpose and need of the project. One measure to reduce congestion is tolling, specifically congestion pricing, on the existing bridges to better manage the limited capacity. Analysis of

tolling in conjunction with the no-build alternative would enable decision-makers to understand how much of the benefit of the build alternatives is a result of tolling and how much is a result of other elements (e.g. high capacity transit and increased highway capacity). We have previously suggested this in written comments on the evaluation criteria (April 2007), written comments on the preliminary DEIS (April 2008), and at meetings of the InterCEP group.

### **3. Clarify model assumptions to ensure the EIS correctly predicts likely impacts of build alternatives on land development patterns.**

The FEIS should clarify several assumptions. One key assumption when projecting future vehicle travel is the cost of fuel. Recently fuel costs have risen significantly, but it is not clear what assumptions about future prices were used when preparing the projections within the DEIS.

Another assumption that should be clarified is the time flexibility of commuters. Currently the bridge is at capacity during peak hours, yet the DEIS suggests that commute related traffic growth will continue to increase through the year 2035. Given that most workers start work at sometime between 7 and 9 am and return home between 3 to 6 pm, over how many hours during the day is it reasonable that commute trips would spread? Do DEIS assumptions about total peak period commute trips in the no-build fit within capacity during the hours of the day when we expect people would commute?

A final issue that should be further analyzed is the possibility that traffic levels will be higher than projected in the DEIS. Higher traffic levels could result from the reduction in congestion that would lower the overall cost (even including tolling) for some travelers, and thus alter their decisions about route, time of departure, place of employment and where to live. The DEIS appears to assume that a \$2 toll is sufficient to counterbalance the time savings from reduced congestion. This basis for this assumption is uncertainty, however, and additional explanation is warranted.

### **4. Transportation Effects on Land Use and Development**

If additional vehicle capacity significantly reduces congestion, land use and development patterns may change in response. We recognize that the traffic projections show a net decrease in vehicle crossings in the build alternatives due to tolling and the addition of high capacity transit (HCT). We understand the argument that this decrease in trips makes it unlikely that significant land use changes would occur. However, a decrease in overall trips does not necessarily mean that the additional trips resulting from highway expansion are the same trips (i.e. same length and timing) that are eliminated due to tolling and HCT. Additional trips resulting from highway expansion may be trips from more distant origins that are now within a reasonable travel shed of destinations on the other side of the bridge. Trips eliminated by HCT are likely to be trips from closer origins served by HCT. Trips eliminated by tolling are likely to be shorter trips for which the monetary toll is a significant increase in the total cost. This net shift towards longer trips could lead to land use changes.

Heather Gunderson, Columbia River Crossing  
July 1, 2008  
Re: Comments on the Draft Environmental Impact Statement

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We support tolling, and agree it would aid in mitigating land use effects of expanded bridge capacity. However, to extent adoption of tolling remains an open question, analysis of build alternatives should address land use effects of build alternatives if tolls are not imposed.

**5. Mitigation Measure: Adjust tolls to meet traffic projections.**

To address the uncertainty surrounding traffic projections and the potential for land use impacts beyond what is projected in the DEIS, we recommend that the LPA include a binding policy that adaptive management will be used to set tolls to ensure that the reductions in vehicle crossing and VMT anticipated in the DEIS are in fact achieved.

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We appreciate your consideration of these comments, and we would be pleased to work with the CRC team on implementing these recommendations.

Yours very truly,



Richard Whitman  
Director

cc: Matt Garrett, Director - Oregon Department of Transportation  
Mike Carrier, Governor's Natural Resources Policy Director

rw/svjh/gundersen.070108