Oregon Chapter
American Society of Landscape Architects
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24 June 2008

Members of the CRC Task Force
700 Washington Street, Suite 300
Vancouver, WA 98660

Re: Interstate 5 Columbia River Crossing
Draft Environmental Impact Statement

Dear Members of the Task Force,

O-002-001 We, the American Society of Landscape Architects (ASLA) Oregon Chapter Executive Committee, are concerned about the Columbia River Crossing (CRC) alternatives as outlined in the current Draft Environmental Impact Statement (DEIS). As our region's largest public works project in history, the outcome of the CRC project will impact our region for generations to come.

In this age of diminishing natural resources, unprecedented fuel costs, and an unquestionable global warming trend, the alternatives presented in the DEIS will exacerbate auto dependence and sprawling development patterns. A shift is occurring among the people of the United States: we are changing our transportation choices and decreasing our rates of driving. Now is the time for major public investments like the CRC to encourage alternative modes of travel.

The twelve-lane automobile facilities described in the CRC DEIS would result in more single occupancy vehicles on the road, a greater quantity of global warming emissions, increased pollution and greater health risks for area residents.

O-002-002 The residents of Oregon and Washington would be expected to contribute two-thirds of the estimated $4.2 billion dollar project cost. The local money earmarked for the CRC construction is crucial to funding other transportation needs. We are gravely concerned about the impact of the CRC expenditure on essential regional transportation projects for decades to come.

O-002-003 We implore you to consider an incremental approach to the CRC design and to meet the following criteria in designing the CRC project:

O-002-001

As described in Chapter 3 (Section 3.4) of the DEIS and in the Indirect Effects Technical Report, highway capacity improvements and access improvements can induce development in suburban and rural areas that were not previously served, or were greatly underserved, by highway access. The DEIS outlines a comprehensive analysis of the potential induced growth effects that could be expected from the CRC project. A review of national research on induced growth indicates that there are six factors that tend to be associated with highway projects that induce sprawl. These are discussed in Chapter 3 (Section 3.4) of the FEIS. Based on the CRC project team's comparison of those national research findings to CRC's travel demand modeling, Metro's 2001 land use / transportation modeling, and a review of Clark County, City of Vancouver, City of Portland and Metro land use planning and growth management regulations, the DEIS and the FEIS conclude that the likelihood of substantial induced sprawl from the CRC project is very low. In fact, the CRC project, because of its location in an already urbanized area, the inclusion of new tolls that manage demand, the inclusion of new light rail, and the active regulation of growth management in the region, will likely reinforce the region's goals of concentrating development in regional centers, reinforcing existing corridors, and promoting transit and pedestrian friendly development and development patterns.

In October, 2008, the project convened a panel of national experts to review the travel demand model methodology and conclusions, including a land use evaluation. The panel unanimously concluded that CRC's methods and conclusions were valid and reasonable. Specifically, the panel noted that CRC would "have a low impact to induce growth…because the project is located in a mature urban area," and that it would "contribute to a better jobs housing balance in Clark County…a positive outcome of the project". These results are summarizes in the "Columbia River Crossing Travel Demand Model Review Report"

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- Prioritize the construction of world-class public transit facilities connecting Clark County and the Trimet system

- Provide world-class bicycle and pedestrian facilities connecting the Clark County and Multnomah County pedestrian and bicycle circulation systems

- Immediately implement tiered price tolling on the I-5 and I-205 bridges to begin congestion reduction.

- Provide HOV lanes. Tolls, transit and HOV lanes are proven methods of reducing driving and congestion

-Reduce overall single occupancy vehicle VMTs to ensure long-term benefits to freight movement.

- Protect regional air quality and the health of residents of the surrounding communities

- Uphold our regional planning and greenhouse gas reduction goals

The fiscal investment in this project should provide equitable public value. Please ensure that our public money is spent wisely by requiring a CRC design that prioritizes alternative transportation, meets our global warming reduction goals, and provides long-term benefits to this region.

Respectfully,

Jennifer B. Richmond, President
The Oregon Chapter Executive Committee
American Society of Landscape Architects

(November 25, 2008) available on request by contacting the CRC office.

For a more detailed discussion regarding potential indirect land use changes as a result of the CRC project, including the likely land use changes associated with the introduction of light rail, please see Chapter 3 (Section 3.4) of the FEIS.

While there was no standard threshold or standardized methodology for estimating greenhouse gas emissions when the DEIS was being developed, the project team worked with federal and state agencies to develop an appropriate analysis methodology that would allow disclosure of impacts and a comparison of alternatives. The DEIS, Chapter 3 (Section 3.19), summarized the results of GHG emissions and climate change analysis conducted for the DEIS alternatives. Further detail was included in the Energy Technical Report that was released along with the DEIS. Following the public comment period on the DEIS, the CRC project team was requested by the Metro Council and Portland City Council to secure independent review of the GHG evaluation conducted for the DEIS. The “Columbia River Crossing Greenhouse Gas Emission Analysis Expert Review Panel Report” (January 8, 2009) available on request by contacting the CRC office describes the activities and findings of the independent review panel. The panel concluded that the GHG evaluation methods and the findings in the DEIS were valid and reasonable. They also found that the findings were likely conservative, and that the LPA would likely reduce GHG emissions even more than estimated in the DEIS. The GHG and climate change analysis in Chapter 3 (Section 3.19) of the FEIS updates the analysis that was in the DEIS, but the basic conclusion that the LPA would have lower emissions than the No-Build Alternative, remains unchanged.

Based on the modeling and analysis, the CRC LPA is expected to significantly increase transit ridership and reduce the number of vehicles crossing the river. This shift toward transit, reduction in auto crossings,

reduced congestion, removal of bridge lifts, and lower accident rates, are all factors that contribute to lower CO2 emissions with the project than without it. These factors will also make it easier for the region to meet goals for reducing GHG emissions.

O-002-002

As the only continuous north-south Interstate on the West Coast connecting the Canadian and Mexican borders, I-5 is vital to the local, regional, and national economy. The I-5 crossing also provides the primary transportation link between Vancouver and Portland, and the only direct connection between the downtown areas of these cities. As described in the DEIS, serious problems face this important crossing, including growing congestion, impaired freight movement, limited public transit options, high auto accident rates, substandard bicycle and pedestrian facilities, and vulnerability to failure in an earthquake. The fact that other important issues face our communities does not diminish the importance of addressing the problems plaguing the I-5 crossing.

CRC assumes funds allocated to other projects would remain dedicated to those projects, and anticipates needing to find new funds to finance the project. Funding for the project will come from a variety of sources including federal grants that would not be available to other transportation projects in the region, State of Oregon, State of Washington, regional and local sources. In addition, it is assumed that the replacement bridge will be tolled. Please refer to Chapter 4 of the FEIS for a description of the current plans for funding construction and operation of the LPA.

O-002-003

Thank you for your comments. The locally preferred alternative includes several of the key elements you have requested - public transit connecting Clark County to the existing MAX light rail system, pedestrian and bicycle facilities connecting the system in Portland to the system in

Vancouver/Clark County, and highway tolling. The project does not propose to immediately implement tolling on I-5 or I-205 but the project does not preclude that option either. Generally, tolls cannot be implemented on an Interstate highway unless improvements are also implemented. The LPA does not propose HOV lanes but HOV lanes have been evaluated as part of the project, and to determine whether the project could accomodate or would preclude a broader HOV system, should the region decide to implement a regional system in the future. In terms of impacts, analysis indicates that the project would be consistent with the general performance goals you have identified - reduce overall VMT, protect regional air quality and human health, uphold regional planning goals and greenhouse gas reduction goals (the project by itself would not reduce I-5 emissions enough to meet the broader goals for the entire region or state, but it would reduce GHG emissions compared to the No-Build Alternative.