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RECEIVED
MAY 2 1 2008
Columbia River Crossing

May 19, 2008

Columbia River Crossing
c/o Heather Gundersen
700 Washington Street, Suite 300
Vancouver, WA 98660

Subject: Draft EIS comments for the Columbia River Crossing.

Dear Sirs,

P-0424-001 Enclosed you will find my six pages of comments and testimony including modified diagrams so those comments are easier to visualize.

Respectfully submitted,

Terry Parker

xc: Steve Stuart, Clark County Commissioner
Robert Liberty, Metro Counselor

P-0424-001

Thank you for taking the time to submit your comments on the I-5 CRC DEIS.

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Testimony on the Draft Environmental Statement for the I-5 Columbia River Crossing Project by Terry Parker

P-0424-002

From my prospective, none of the five alternatives meet reality check objectives that should be a part of this process.

ALTERNATIVE 1, the No-Build does not have enough capacity for either motor vehicles or transit in addition to lacking the safety requirements of a modern freeway.

ALTERNATIVE 2, the Replacement Crossing with Bus Rapid Transit, and **ALTERNATIVE 3**, Replacement Crossing with Light Rail both have too massive of a foot print, including across the river, and both are too expensive to construct.

P-0424-003

ALTERNATIVE 4, the supplemental Crossing with Bus Rapid transit and **ALTERNATIVE 5**, the Supplemental Crossing with Light Rail both are nothing more than a sham of a middle ground option that appears to be designed for the purpose of politically eliminating any type of less costly options to compete with a big new bridge. Additionally, this alternative places too much emphasis on transit.

P-0424-004

It is time to take the politics out of this project and come up with a reasonably cost effective reality check option that meets the needs of **ALL** of the users of the I-5 Columbia Crossing while seriously addressing the concept of not just recycling, but reusing the existing I-5 historical bridges.

My Suggestion is as Follows

Clearly it is obvious a new I-5 Columbia River Crossing is needed for interstate highway mobility purposes and to meet the modern safety standards of a freeway. One of those safety standards is not to have a lift span that stops and backs up traffic, and is prone to causing crashes on an Interstate Highway. Therefore a new bridge **MUST** be constructed **for I-5 through traffic**. However this bridge only needs to have six full width full service lanes, three in each direction, with adequate shoulders along with other safety amenities if the current I-5 historical bridges are retained for local traffic and interchange purposes. Furthermore, retaining the current historical bridges uses less energy for construction than it does to completely replace them. Therefore, with the right modifications, retaining the historical bridges can be viewed as more eco-friendly.

While the newly constructed bridge would only carry through traffic with **NO HOV lanes**, the existing bridges would carry local motor vehicle traffic and interchange traffic in the following manner:

The current southbound bridge would carry all southbound motor vehicle traffic coming from the South side of Vancouver and SR-14 onto Hayden Island with an entrance to I-5 on the South side of Hayden Island. Traffic from Hayden Island proper would also use this same entrance ramp for going South on I-5.

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P-0424-002

Preferences for specific alternatives or options, as expressed in comments received before and after the issuance of the DEIS, were shared with local sponsor agencies to inform decision making. Following the close of the 60-day DEIS public comment period in July 2008, the CRC project's six local sponsor agencies selected a replacement I-5 bridge with light rail to Clark College as the project's Locally Preferred Alternative (LPA). These sponsor agencies, which include the Portland City Council, Vancouver City Council, TriMet Board, C-TRAN Board, Metro Council, RTC Board, considered the DEIS analysis, public comment, and a recommendation from the CRC Task Force when voting on the LPA.

With the LPA, new bridges will replace the existing Interstate Bridges to carry I-5 traffic, light rail, pedestrians and bicyclists across the Columbia River. Light rail will extend from the Expo Center MAX Station in Portland to a station and park and ride at Clark College in Vancouver. Pedestrians and bicyclists would travel along a wider and safer path than exists today.

For a more detailed description of highway, transit, and bicycle and pedestrian improvements associated with the LPA, see Chapter 2 of the FEIS.

P-0424-003

The CRC Task Force - composed of 39 leaders from a broad cross section of Washington and Oregon communities – was tasked with advising the CRC project team, including federal sponsors, and providing guidance and recommendations at key decision points over the course of nearly 3 ½ years. Public agencies, businesses, civic organizations, neighborhoods and freight, commuter and environmental groups were all represented on the Task Force. The Task Force voted to develop a supplemental bridge alternative, in an attempt to find an alternative to

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P-0424-004

Northbound traffic from I 5 headed for Hayden Island would exit I-5 on the South side of the island. Traffic going into to South Vancouver and SR-14.would use the same exit I-5 on the South side of Hayden Island and then use the existing northbound bridge. Traffic from Hayden Island headed to I-5 northbound would use a joint I-5 northbound entrance with traffic from SR-14 on the North side of the Columbia,

Since the speed limit on the existing bridges would be lowered and local traffic would move at a slower pace than the I-5 freeway traffic, many of the traffic safety concerns that exist today on the current bridges would be minimized.

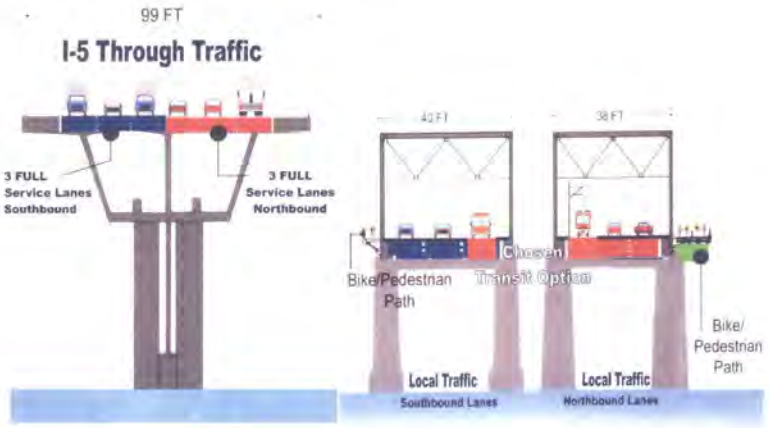
On Hayden Island proper there would be a local frontage road to handle the interchange traffic crossing the island, and a signalized diamond intersection in the middle to handle traffic on and off Hayden Island itself.

Sidewalks on the bridge(s) could be widened similar to what was done to the Hawthorne Bridge over the Willamette River in Portland for bicyclists and pedestrians.

Under this reuse scenario there are two possible alternatives for the chosen transit option to cross the Columbia.

P-0424-005

ALTERNATIVE A: This alternative would have transit use one of the existing lanes on each of the existing bridges. The benefit here is that the chosen transit option would have a ground level landing on each end, not being up in the air, thereby making it safer for transit passengers and less costly to construct boarding platforms. Additionally by using the existing bridges for the chosen transit option, a lower construction cost along with less energy use for construction could probably be realized. The downside to having transit using the existing bridges is the lift spans. However, both Max and TriMet bus service that cross the Willamette River in Portland already deal with lift spans.



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total bridge replacement that would still meet the project's purpose and need but at lower cost and with greater reliance on managing demand with higher tolls and more transit service. The two most promising supplemental alternatives were considered in the DEIS. Based on the detailed analysis that followed, the Task Force recommended, and all project sponsors agreed, that the replacement bridge with light rail was the locally preferred alternative.

P-0424-004

Many different options for addressing the project's Purpose and Need were evaluated in a screening process prior to the development and evaluation of the alternatives in the DEIS. Options eliminated through the screening process included a new corridor crossing over the Columbia River (in addition to I-5 and I-205), an arterial crossing between Hayden Island and downtown Vancouver, a tunnel under the Columbia River, and various modes of transit other than light rail and bus rapid transit. Section 2.5 of the DEIS explains why a third corridor, arterial crossing, and several transit modes evaluated in screening were dropped from further consideration because they did not meet the Purpose and Need.

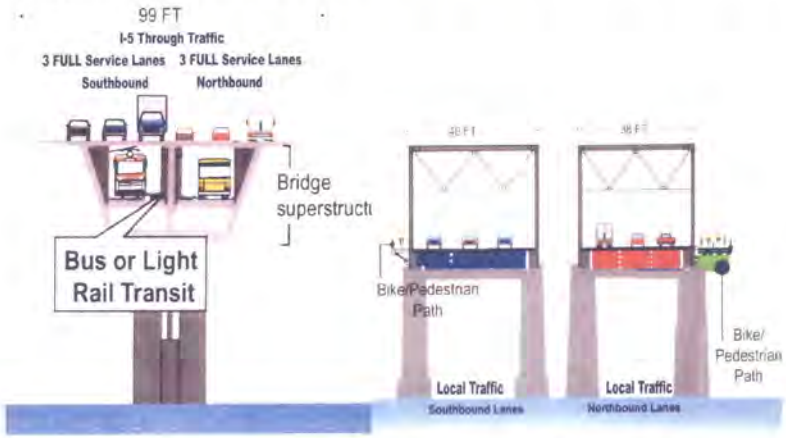
P-0424-005

Please see response to comment P-0424-004.

As documented in the Panel Assessment of Interstate Bridges Seismic Vulnerabilities Technical Report (2006), it was determined necessary for any CRC project alternative that reused the existing I-5 bridges to also seismically retrofit those bridges. The DEIS analyzed a Supplemental River Crossing as a component of two out of the five alternatives studied.

A Supplemental River Crossing, which would retain and seismically retrofit the existing bridges for northbound traffic and add one new bridge to the west for southbound traffic, was not chosen as a part of the

P-0424-005 **ALTERNATIVE B:** This alternative could only be realized if the conceptual design of a stacked transit/highway bridge can be achieved. The positive aspects of such an option would allow for shared construction costs of the chosen transit option with a new six full service lane freeway bridge having no lift span. The downside of this option is the landing for transit at each end would be up in the air, safety for transit passengers could be compromised in that waiting areas would possibly be isolated, and the cost of construction for the boarding platforms, particularly if elevators and stairs are needed, would be significantly higher than ground level platforms.



P-0424-006 **Under NO circumstances should there be a separate bridge structure constructed for the chosen transit option, bicycles and/or pedestrians.**

P-0424-007 The existing crossing is a **historical landmark** that needs to be preserved.

P-0424-008 With some seismic modifications and upgrading of the existing bridges including a wider sidewalk for a bicycle and pedestrian connection, by using the existing bridges for local and interchange traffic, by eliminating the northbound entrance ramp to I-5 and southbound exit ramp from I-5 that are currently directly on Hayden Island, and by **NOT** building a separate bridge for the chosen transit option, bicycles and pedestrians; the costs of the overall project could be significantly reduced thereby **COSTING the TAXPAYERS LESS MONEY**!

Furthermore, using the existing bridges for local and interchange traffic, bicycles and pedestrians, and possibly transit, lessens the construction disruption as compared to total replacement, lessens the amount of energy needed for construction, **lessens the footprint of the project**, lessens the negative eco-effects of the project, adds to the green effect of the project and preserves a historical structure - all of which equate to a **SAVINGS for TAXPAYERS** while still building a workable project that will meet the needs of the region.

P-0424-009 **These logical and cost savings re-use options MUST be fully considered!**

Locally Preferred Alternative by the local sponsor agencies. This decision was informed by the DEIS, which found, among other things, that the Supplemental River Crossing would not substantially improve congestion over No-Build, would maintain some substandard and unsafe design features, and would not be substantially cheaper to construct than a replacement river crossing, as originally believed. In addition, the Supplemental crossing could worsen marine navigation by retaining the existing piers, and adding a new set of structures in the water with the new bridge. The US Coast Guard informed the project in a letter dated January 26, 2006, that "retention of one of the existing bridges for travel off Interstate 5 would at best maintain the same degree of difficulty to vessels, especially downbound tows. For that reason I would also not recommend such a plan…"

Though the Supplemental River Crossing would improve the seismic safety of the existing bridges, these findings indicate that it did not meet the project's Purpose and Need as effectively as the Replacement River Crossing.

Also, please note that transit stations are not proposed to be located at both ends of the I-5 bridge. Instead, the stations would be located within downtown Vancouver and at a central location on Hayden Island. Additionally, the Stacked Transit/Highway Bridge option was deemed reasonable and is included in the LPA.

P-0424-006

The Stacked/Transit Highway Bridge (STHB) option, which would allow transit, bicyclists, and pedestrians to travel beneath the highway bridge deck, was included as part of the LPA. The DEIS indicated that the two bridges required for this bridge option would put less bridge sub-structure in the Columbia River, likely resulting in less environmental impact. After publication of the DEIS, additional engineering studies were conducted that confirmed the feasibility of the STHB design.

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Potential Bridge Tolls and Cost Sharing

P-0424-010

Once gain, when it comes to tolling, it is time to take all the politics out and establish a reality check option that meets the needs of **ALL** of the users and **ALL** of the vehicle modes of transport. **"If" tolling is implemented for any kind of motor vehicles, then the users of ALL modes of vehicular traffic, including transit passengers and bicyclists, MUST be required to pay a toll or a user charge.** Anything less is socialistic policy making that has no place in a democratic society and smacks of discrimination. With the users of various vehicular transport modes sharing the crossing, then the users of **ALL** vehicular transport modes must share in the financial responsibility.

Taxpayer subsidies for any transit option and/or infrastructure must NOT come from motorist paid tolls. Transit user tolls or surcharges on transit fares need to be mandated to help pay the local match moneys for any transit infrastructure, a proportionate share of the bridge superstructure costs and any upgrades associated with transit related to the Columbia River Crossing project

Bicyclists too must pay their own way with a toll to cover any local match monies spent on the specialized infrastructure to accommodate them, including a proportionate share of bridge superstructure costs. If it is not cost effective to provide bicycle infrastructure and/or improved bicycle infrastructure as part of the crossing project due to inaccurate and/or non-existent projected counts based on an accurate count of the current number of bicyclists using the crossing, then any policy of providing bicycle infrastructure must be revisited in favor of not fleecing taxpayers. A per bicycle trip cost analysis based on the financial costs to provide bicycle infrastructure must be taken into consideration before any decision is made. **Any tolls that are imposed on motorists MUST NOT be used to subsidize and/or pay for bicycle infrastructure.**

P-0424-011

Moreover, there should be **NO** consideration of what is commonly called congestion pricing where at certain times of the day the cost is higher to use the crossing. This too is discrimination in that most people can not choose their own hours of employment. You do not see local or regional governments allowing or making requests to employees they come in a couple of hours earlier in the morning or leave a couple of hours later in the evening to reduce rush hour congestion. Democratic governments are supposed to be the servants of the people accommodating citizen needs, not dictating to the people like an elitist ruler.

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The STHB is described in greater detail in Chapter 2 (Section 2.2) of the FEIS. Impacts associated with a STHB are discussed throughout Chapter 3 of the FEIS.

P-0424-007

As indicated in Chapter 3 (Section 3.8) of the DEIS, the 1917 (northbound) I-5 bridge structure is listed on the NRHP. The 1958 (southbound) bridge, as a bridge on the National Interstate System, was determined not to be significant at a national level and is not considered eligible for the NRHP. However, the two bridges together are an important element of the historic fabric both for the region and for downtown Vancouver.

Because the 1917 bridge is listed on the NRHP, it is afforded special protection under section 4(f) of the Department of Transportation Act. This law prohibits the USDOT from funding any project that would have an adverse impact on significant historic resources, unless it can be demonstrated that there are no prudent and feasible alternatives that would avoid that impact.

The Supplemental River Crossing, which maintained the existing bridges with seismic retrofits and was analyzed as a component of two of the five alternatives studied, was determined feasible, but not prudent. It would not satisfactorily meet the project need. In addition, the alterations necessary to make the existing bridges safe, reliable, and fully multi-modal, as described in Chapter 4 of the DEIS and FEIS, would undermine the historic integrity of the bridges. The Sponsoring Agencies therefore decided to remove and replace the existing bridges.

Proposed mitigations for the adverse effects of the NRHP-listed I-5 bridge can be found in Chapter 3 (Section 3.8) of the FEIS.

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HOV Lanes - Not

P-0424-012

HOV lanes **DO NOT** work well in this corridor. They simply create more congestion and gum up the rest of the travel lanes with stop and go traffic. Vehicles crossing over the full service lanes from the HOV lane to use an exit ramp, and vehicles crossing over to the HOV lane from an entrance ramp create a significant negative impact on the other lanes of traffic. Large tractor trailer motor freight rigs take considerably longer that to get momentum again after stopping than do cars and light trucks. These big rigs would have to do it less often and would conserve more fuel if it were not for the crossing over of other vehicles to and from the HOV lanes. The crossover traffic to and from the HOV lanes also undoubtedly adds to the number of crashes in the corridor thereby making the existence of any restricted HOV lane a higher safety risk for all freeway users.

The HOV lanes are far more of a political mindset statement and dictatorial restriction that cater to the special interests than they are a workable policy in this corridor. .

Therefore, for all of the afore mention reasons, **all existing HOV designated travel lanes need to be returned to full service usage status with NO new HOV lanes created.**

Political Mindsets and Special Interests

P-0424-013

Political mindsets and special interest agendas have meddled in, hindered, attempted to change the direction and alter the focus of this project for which the primary objective, stated or not, is to cost effectively meet the regional needs of transport based economy, meet the needs of an Interstate Highway System, and meet the needs of a local river crossing for **ALL** users. Alternatives one through five all are lacking in one or more of these aspects. The no-build is capacity deficient. The big bridge simply too massive and expensive. The supplemental bridge as developed by the ad-hock middle ground sub-committee is a pointless folly designed to be a failure as proposed; and the transit component is too much of a dictatorial mandate while the motorist only tolling/congestion pricing concept is a discriminatory tax hike aimed straight at the pocket books of working middle class that will negatively affect mainstream household incomes, and therefore negatively impact the local economy. There is and has been absolutely far too much discussion involving political and special interest agendas about ways this project can dictate the travel and mode choices people make. Now it is time for logic, common sense and democracy to intervene by providing a reality check to the mayhem, setting aside this discussion of controlling choice and getting back to developing an impartial, unbiased and balanced plan that accommodates and treats all users **EQUALLY** regardless of mode choice.

P-0424-014

Furthermore, it must be the voters of Vancouver and Clark County Washington that decide if they want light rail running through the communities on their side of the river, not the transit authoritarians, Oregonians or even Oregon politicians. The decision is for Washington residents alone, and whatever that decision is, it must not stop or block an upgraded Columbia River Crossing for I-5 and local motor vehicle traffic from being constructed.

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P-0424-008

Please see response to comment P-0424-005.

P-0424-009

Many different options for addressing the project's Purpose and Need were evaluated in a screening process prior to the development and evaluation of the alternatives in the DEIS. Options eliminated through the screening process included a new corridor crossing over the Columbia River (in addition to I-5 and I-205), an arterial crossing between Hayden Island and downtown Vancouver, a tunnel under the Columbia River, and various modes of transit other than light rail and bus rapid transit. Section 2.5 of the DEIS explains why a third corridor, arterial crossing of the Columbia River, and several transit modes evaluated in screening were dropped from further consideration because they did not meet the Purpose and Need. For a general description of the screening process see Chapter 2 (Section 2.7) of the FEIS. It should be noted that every proposal received from the public was considered, and many of the proposals that were dropped from further consideration included elements that helped shape the alternatives in the DEIS.

P-0424-010

Please refer to Chapter 4 of the FEIS for a description of the current plans for funding construction and operation of the LPA. This discussion provides an updated assessment of likely funding sources for this project, though it is not common practice to receive funding commitments prior to completion of the alternative selection process. As described in the FEIS, project funding is expected to come from a variety of local, state, and federal sources, with federal funding and tolls providing substantial revenue for the construction. As Oregon and Washington businesses and residents will benefit from the project's multi-modal improvements, both states have been identified as contributors to the project. As jurisdictions on both sides of the river seek to encourage non-auto travel, tolls are not anticipated for bikes,

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In Conclusion

P-0424-015 The final chosen project must be one that that brings the two sides of the river closer together, not farther apart with motorist only tolls.

P-0424-016 Retaining what is already in place, the existing historical bridges, as part of the project is both less costly and less eco-damaging from a construction standpoint as compared to completely replacing them.

P-0424-017 The final chosen project must provide for a just and equitable financing package for local match monies whereby: **"IF" there is any kind of user charge for the crossing, then the users of ALL vehicular modes of transport must be proportionately charged**.

P-0424-018 And finally, the final preferred chosen project **MUST insure that ALL users are equally accommodated and planned for without political, financial, discriminatory or any other kind of bias, be it personal choice of transport mode or otherwise.**

Testimony respectfully submitted,

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pedestrians, and transit users. Lastly, CRC assumes funds allocated to other projects and purposes would remain dedicated to those projects and purposes.

P-0424-011

The CRC project proposes to include a variable rate toll. The goal of variable-rate tolling is to reduce congestion and maximize the flow of traffic through this corridor. With a variable rate toll, a lower toll is charged when traffic demand is lower and a higher toll is charged when the corridor is at its highest demand. Because a toll is charged by time of day, variable-rate tolling gives travelers an incentive to change travel times, reduce optional trips, take an alternate route, or choose transit as an alternative to driving alone. Experiences in other cities in the U.S. and around the world have shown that these fees can help reduce congestion and improve the performance of the roadway.

P-0424-012

The CRC project does not include HOV lanes inside its five-mile project area. The CRC project team looked at HOV lanes and freight lanes, which are typically located on the inside freeway lane next to the barrier, as part of its technical analysis. Because about 70 percent of the vehicles enter and/or exit I-5 within the five-mile study area, access to and from a HOV lane or freight lane could create traffic operational problems by increasing lane changes (for example, HOVs entering the freeway and needing to merge all the way to the inside lane). The results of this analysis is described in more detail in Chapter 3 (Section 3.1) of the DEIS. Regarding the existing HOV lanes located outside the project area, the CRC project does not propose any changes. These HOV lanes might effectively link to HOV lanes in the CRC area in the future, if employed as part of a larger regional plan. Should the region adopt and develop a larger HOV system, lanes within the bridge influence area could potentially be striped as part of that network.

P-0424-013

Thank you for your comment. Extensive technical and public review and input has been included in all phases of the CRC project, from developing a purpose and need statement, screening a wide variety of alternatives, and developing a Draft and Final EIS. This process met the requirements and intent of NEPA law and has resulted in a DEIS and FEIS that are complete and sound. The CRC public involvement program includes numerous advisory groups to ensure the values and interests of the community are reflected in project decisions. These groups include representatives of public agencies, businesses, civic organizations, neighborhoods and freight, commuter and environmental groups. Feedback from the general public and advisory groups has been generally supportive of the project, including support for the transit, bicycle, pedestrian, highway, interchange, and financing elements of the project. See Chapter 2 of the FEIS for more discussion on the process used to develop project alternatives and select a Locally Preferred Alternative.

P-0424-014

There will not be a public vote on construction of the various CRC project elements. However, as a public project, it must be approved and funded by the decisions of elected officials who are themselves directly elected by voters. Long-term operation and maintenance of the new light rail line will be funded through C-TRAN and TriMet. For its share of the operations and maintenance funding, C-TRAN plans on pursuing a public vote.

P-0424-015

Details of the tolling system are still being refined as the project enters the final design stage. It is currently not anticipated that transit users, bicyclists or pedestrians will pay a toll. The project, as well as the adopted plans of local agencies, encourage the use of these alternative

modes of travel. The project and the sponsoring agenies would rather provide an incentive to use these modes than a penalty.

P-0424-016

As described in Chapter 4, Financial Analysis, of the DEIS, the capital costs of the supplemental river crossing option would have been similar to that of the replacement river crossing option. Additionally, as described in Sections 3.14 and 3.16 of the DEIS, the supplemental river crossing option would have required substantial in-water work to build the new bridge and perform the seismic rehabilitation needed on the existing bridge piers. The magnitude of environmental impacts from construction activities for the replacement and supplemental river crossing options would be similar.

P-0424-017

Please see response to comment P-0424-015.

P-0424-018

Thank you for your comment. As discussed above, advisory groups have helped to ensure the values and interests of the community are reflected in project decisions. These groups include representatives of public agencies, businesses, civic organizations, neighborhoods and freight, commuter and environmental groups.