

O-007-001

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

From: [Gretchen Starke](#)
To: [Columbia River Crossing](#)
CC:
Subject: formal comments on deis from vancouver audubon society
Date: Monday, June 30, 2008 3:37:31 PM
Attachments: [columbia river crossing.doc](#)

To Whom It May Concern:

O-007-001 As representative of an organization, I prefer to submit our formal comments as a document rather than fill out a form. We have particular concerns that do not fit a rigid format. Please find our comments in the attached documents. Thank you.

Gretchen Starke,

Conservation Chair,
Vancouver Audubon Society

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VANCOUVER AUDUBON SOCIETY

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O-007-002 | The Vancouver Audubon Society understands that transportation issues have an impact on wildlife and wildlife habitat. In the case of the Columbia River Crossing, the greatest impact on wildlife and birds concern greenhouse gas emissions and changes in land use patterns.

O-007-003 | Global warming is not only the most serious environmental problem we face, it is the most serious problem, period. It will be difficult to solve that problem because high-carbon emission production is so imbedded into our economy and culture and because few understand the seriousness of the situation. Even those who prepared this EIS, while acknowledging there is a problem, don't realize that business as usual can't continue. To keep the temperature increase resulting from CO₂ emissions at the lowest predictions of the IPCC, the world as a whole must stabilize greenhouse gases at 445 ppm by 2015. As of last summer, green house gas concentrations were approaching 400 ppm (The Physical Science behind Climate Change; Collins, et al; Scientific American, August 2007; pg 64-73). It is apparent that even in our little corner of the world, we are going to have to do all we can to sharply reduce our CO₂ emissions. Business as usual will not do.

O-007-004 | All the alternatives considered are based on business as usual, or almost business as usual. While the EIS extrapolates into the future, analyses consider trends that are based on laws and regulations that have passed recently. Perhaps that is all that could be done. Yet, it would have been useful had there been an analysis of CO₂ emissions under the various alternatives, assuming stronger regulations are in place. Such regulations, along with incentives and changes in policies might include the following.

- Policies that sharply decrease the size and fuel consumption of vehicles.
- Policies that discourage the use of private vehicles in urban areas.
- Policies that strongly encourage the movement of long-distance freight from trucks to trains (or barges).
- Policy changes that will sharply decrease growth, either in population increase or in acreage used per unit of population or both.
- Policies that will sharply decrease or eliminate coal as a fuel for electricity production (As far as I could tell, the EIS did not mention that Washington passed a law last year that requires any coal-fueled plant to produce a net increase in CO₂ emissions. As a result of this law, those who proposed a coal-fueled plant near Kalama changed their minds.)

O-007-005 | There should have also been another (or maybe two more) alternative examining the effects of building a bridge with capacity for transit, but fewer lanes for trucks and cars.

O-007-002

Impacts to wildlife and wildlife habitat are discussed in Section 3.16 of the FEIS and in the CRC Ecosystems Technical Report.

O-007-003

The CRC project will reduce GHG emissions compared to No-Build, but significant state-wide or even region-wide reductions in GHG emissions will require the combined reductions of many more actions.

O-007-004

Greenhouse gas reduction is not part of the fundamental purpose and need for the proposed project, so various other means for reducing greenhouse gas emissions in the region have not been extensively evaluated as part of this project. Even so, GHG emissions would be lower with the LPA than with No-Build. In addition, the project is considering various ways to further reduce emissions, as discussed in the FEIS Chapter 3 (Section 3.19).

O-007-005

Following the selection of the LPA in July of 2008, the CRC Project Sponsors Council (PSC) was developed to provide recommendations to the project on a variety of issues, including the number of add/drop lanes over the river crossing. Over the course of several months, PSC was provided with operational characteristics and potential environmental impacts of 8-, 10-, and 12-lane options. These technical evaluation criteria included, but were not limited to, traffic safety, congestion, traffic diversion onto local streets and I-205, regional vehicle miles travelled, transit ridership, regional economic impact, effects to neighborhoods, and protected species and habitats. In addition to the technical information, PSC received input from CRC advisory groups and reviewed public comment submitted to the project and obtained during two public Q&A sessions in January 2009 regarding the number of lanes

O-007-005 | The reasons for considering such alternatives are that it would be recognized that business as usual may not be the future and that there would be less risk of a bridge being built that was over-built. Experience indicates that, concerning highway construction (including bridge construction), if we build it, they will come. The seeds for the congestion on the I-205 bridge were planted the minute the route of the new freeway and bridge was decided. Greatly increasing the capacity of the I-5 bridge will only encourage more people to live – and drive – in Clark County.

O-007-007 | In sum, we support a replacement bridge because the present bridge is simply not safe. Having a bridge collapse into the Columbia, whether caused by an earthquake or simply because there was one truck too many on the bridge, does nothing for wildlife or human beings. Further, each bridge lift causes that much more greenhouse gas emissions. Besides, the DEIS makes clear that the no-build alternative means that CO₂ emissions would increase faster than under any of the supplemental alternatives. I suspect that, because of the lack of meaningful alternatives for getting across the river, even if policies and regulations are improved as I stated above, CO₂ emissions would increase to unacceptable levels under the no build option. We definitely support a public mass transit component. Assuming the people of this country become determined to do what is necessary to lessen the worst effects of global warming, all coal burning electric plants would be replaced by facilities that produce little or no CO₂ emissions. In such a case, light rail would be the better choice. The total replacement of diesel from petroleum by biodiesel would also help with net CO₂ emissions. We do not think that a 12-lane bridge should be built, however. Considering all the ramifications of global warming and the decline of oil availability in the world, it seems likely that vehicular traffic will decrease toward the middle of this century. The bridge would be over-built. Further, the prospect of increased bridge capacity probably would drive even more development in Clark County, an undesirable prospect. We totally oppose the supplemental bridge alternatives.

O-007-008 |

Sincerely,

Gretchen Starke,
Conservation Chair,
Vancouver Audubon Society

decision, as well as hearings conducted by Portland City Council and by Metro Council. In August 2010, the PSC voted unanimously to recommend that the replacement bridges be constructed with 10 lanes and full shoulders. For more information regarding the number of lanes decision making process, see Chapter 2 (Section 2.7) of the FEIS.

The proposed new lanes are add/drop lanes (i.e., lanes that connect two or more interchanges), which are used to alleviate safety issues associated with the closely spaced interchanges in the project area, and accommodate the 68 to 75% of traffic that enters and/or exits I-5 within two miles of the Columbia River.

O-007-006

As described in Chapter 3 (Section 3.4) of the DEIS and FEIS, 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 the Indirect Effects Technical Report. 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, the CRC project 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 the 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 summarized in the "Columbia River Crossing Travel Demand Model Review Report" (November 25, 2008).

In 2010, Metro ran the MetroScope model (an integrated land use and transportation model) to forecast growth associated with transportation improvements of a 12-lane river crossing and light rail to Clark College. Even with a 12-lane river crossing, the model showed only minimal changes in employment location and housing demand compared to the No-Build Alternative.

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.

O-007-007

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.

O-007-008

Traffic forecasts reported in the DEIS and used to inform decisions on a locally preferred alternative were derived from adopted regional employment and population forecasts and state-of-the-art modeling and evaluation conducted by Metro, RTC and the project team, and reviewed by all project sponsor agencies as well as FTA and FHWA. In addition, an independent panel of traffic modeling experts was convened in October 2008 to review the modeling methods and findings. These experts concluded that the project's approach to estimating future travel demand was reasonable and that it relied on accepted practices employed in metropolitan regions throughout the country. These findings are summarized in the "Columbia River Crossing Travel Demand Model Review Report" (November 25, 2008). This independent review confirmed the approach CRC modeling used to address multiple variables that can affect travel demand, including gasoline prices, tolling, travel demand measures and induced development.

Regarding the proposed new add/drop lanes (i.e., lanes that connect two or more interchanges), they are used to alleviate safety issues associated with the closely spaced interchanges in the project area and are not designed to increase capacity generally on I-5. 68 to 75% of I-5 traffic enters and/or exits I-5 within the CRC project area, and these add/drop lanes provide space for this traffic to do so without disrupting cars and trucks traveling to destinations further north and south of the project area. The project does not propose to add lanes north or south of the project limits. The DEIS evaluation found that the project, with a toll and LRT, would actually reduce the total daily volume of traffic using the I-5 and I-205 river crossings by approximately 3%. The FEIS analysis of the project has been updated to include an evaluation of how the CRC project would affect Vehicle Miles Traveled (VMT). Rather than inducing sprawl, the CRC project 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.