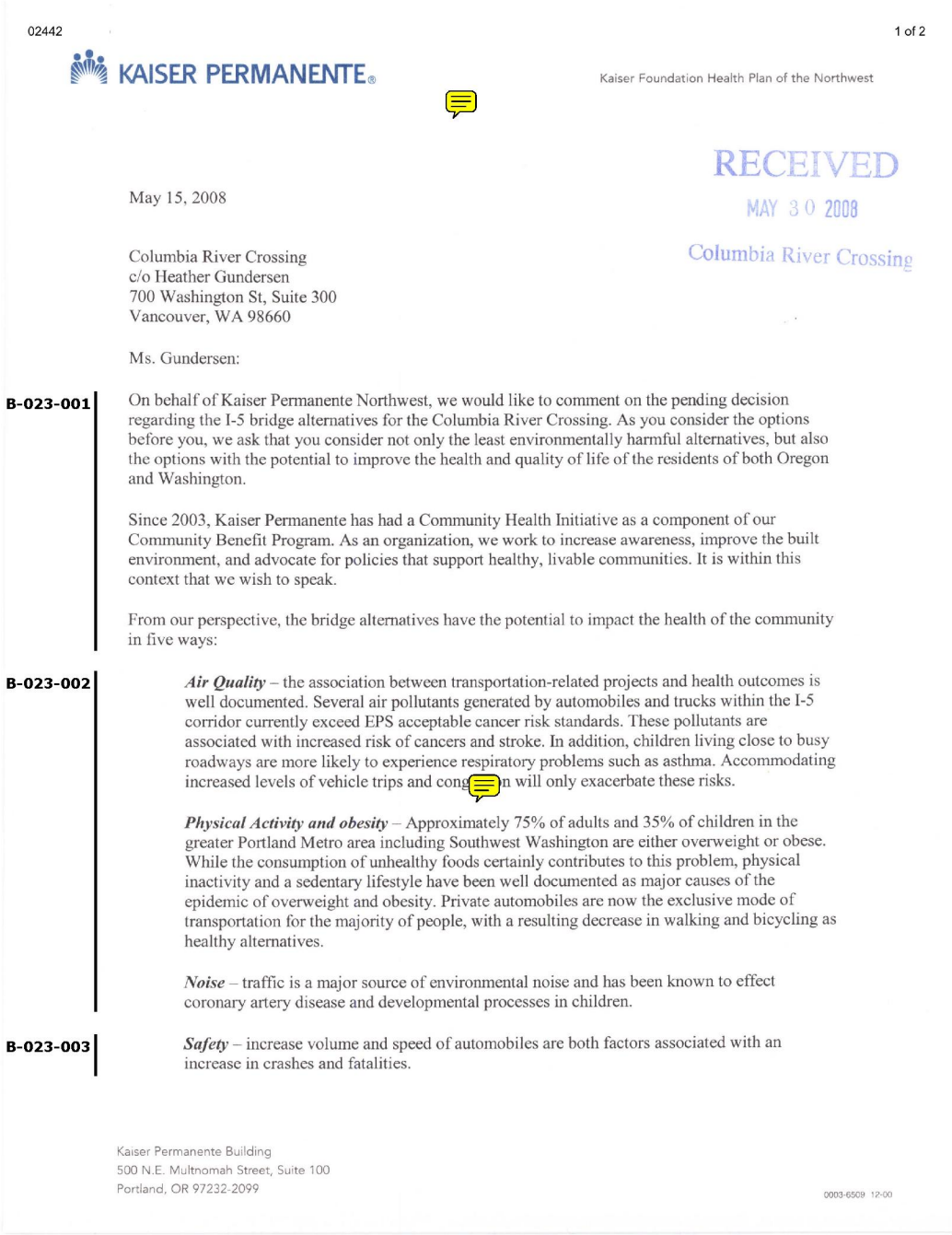

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Kaiser Foundation Health Plan of the Northwest

RECEIVED
MAY 30 2008
Columbia River Crossing

May 15, 2008

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

Ms. Gundersen:

B-023-001 On behalf of Kaiser Permanente Northwest, we would like to comment on the pending decision regarding the I-5 bridge alternatives for the Columbia River Crossing. As you consider the options before you, we ask that you consider not only the least environmentally harmful alternatives, but also the options with the potential to improve the health and quality of life of the residents of both Oregon and Washington.

Since 2003, Kaiser Permanente has had a Community Health Initiative as a component of our Community Benefit Program. As an organization, we work to increase awareness, improve the built environment, and advocate for policies that support healthy, livable communities. It is within this context that we wish to speak.

From our perspective, the bridge alternatives have the potential to impact the health of the community in five ways:

B-023-002 ***Air Quality*** – the association between transportation-related projects and health outcomes is well documented. Several air pollutants generated by automobiles and trucks within the I-5 corridor currently exceed EPS acceptable cancer risk standards. These pollutants are associated with increased risk of cancers and stroke. In addition, children living close to busy roadways are more likely to experience respiratory problems such as asthma. Accommodating increased levels of vehicle trips and cong[illegible]n will only exacerbate these risks.

Physical Activity and obesity – Approximately 75% of adults and 35% of children in the greater Portland Metro area including Southwest Washington are either overweight or obese. While the consumption of unhealthy foods certainly contributes to this problem, physical inactivity and a sedentary lifestyle have been well documented as major causes of the epidemic of overweight and obesity. Private automobiles are now the exclusive mode of transportation for the majority of people, with a resulting decrease in walking and bicycling as healthy alternatives.

Noise – traffic is a major source of environmental noise and has been known to effect coronary artery disease and developmental processes in children.

B-023-003 ***Safety*** – increase volume and speed of automobiles are both factors associated with an increase in crashes and fatalities.

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500 N.E. Multnomah Street, Suite 100
Portland, OR 97232-2099

0003-6509 12-00

B-023-001

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

B-023-002

The DEIS and FEIS analyses of impacts to air quality, noise, electromagnetic fields, and other factors that can affect human health, are based on comparing the project's impacts to specific standards that have been established to protect public health. Ensuring the project will meet or better these standards is used as a method to determine whether the project will have an adverse effect on human health. The criteria used in the DEIS and the FEIS are based on government regulatory standards where they have been established (such as for criteria air pollutants). Where regulatory standards do not exist, then the criteria are based on government agency guidelines or thresholds established by public health and safety professionals.

Modeling conducted for the DEIS and FEIS indicate that air emissions from I-5 traffic will be significantly lower by 2030 than they are today, and will be well below established regulatory standards designed to protect human health (see Section 3.10 of the DEIS and Section 3.10 of the FEIS). Noise impacts from I-5 traffic, with the mitigation proposed for the CRC project, will also be substantially lower than today. Noise from the light rail can be mitigated below FTA's noise impact criteria as well (see Section 3.11 of the DEIS and Section 3.11 of the FEIS).

The DEIS did not explicitly evaluate potential effects on physical activity or obesity. However, the DEIS and FEIS both discuss how the project could affect the surrounding urban form that would increase opportunities for physical activity, including: improved bicycle and pedestrian facilities crossing the river; improved connections between existing and new bike and pedestrian paths and across I-5; the LRT extension and transit stations that support increased pedestrian-oriented

B-023-004

Environmental Justice – each of the bridge alternatives (including leaving the bridge as is) will disproportionately harm the health of disadvantaged communities in Multnomah and Clark counties. Increased traffic flow through neighborhoods with higher than average proportion of communities of color and low income households cannot be averted at this time, but it's important to recognize that the burden for further development will fall on those who are already encountering environmental inequity.

B-023-005

We realize that sustaining economic growth is an important priority for our region, and this requires a transportation infrastructure that efficiently moves trucks and automobiles. On the other hand, enhancing the health of our people and protecting the environment in which they live are also paramount. These priorities are not mutually exclusive but do require careful analysis to avoid achieving one at the expense of the others. That is why Kaiser Permanente strongly supports the options that include both well planned mass transit and bike and pedestrian facilities. Evidence shows that people utilizing mass transit tend to walk and bike more than those dependant on private automobiles and this represents an improvement in health. In addition to opportunities for active transport, attractive bike and pedestrian facilities offer recreational opportunities that enhance the livability of our community.

We realize that the task before you is difficult, but we ask you to consider the impact your decision will have on the health of this region for decades to come. We are happy to support your task force in making the Columbia River Crossing a healthy addition to the NW landscape.

Sincerely,

Nancy H. Stevens, Ph.D.
Director, Community Benefit

Philip Wu, MD
Department of Pediatrics
Clinical Pediatric Lead, Pediatric Weight Management Initiative

development; improved sidewalks in Vancouver; and new pedestrian and bicycle connections crossing I-5. The project would also reduce daily hours of congestion on I-5 compared to the No-Build and provide greatly improved transit service, both of which decrease the amount of time travelers spend in cars, thus further promoting physical activity.

B-023-003

As described in Chapter 3 (Section 3.1) of the DEIS, ODOT's Safety Priority Index System (SPIS) ranked two locations within the CRC project area, the Hayden Island Interchange and the North Portland Harbor Bridge, within the top 5% of the highest scored sites or, high crash locations, in the state for 2004 to 2006. Within Washington, five locations along I-5 in the project area have been categorized by WSDOT as high accident locations, as reported in the DEIS.

Improving safety and mobility of cars and freight using the bridge and highway is a part of the CRC project's purpose and need. As described in Chapter 3 (Section 3.1) of the DEIS and FEIS, the replacement bridge and highway alignment, which was chosen as part of the LPA, includes a range of safety and design improvements. Some of those improvements include:

- A new bridge structure high enough for marine traffic, which eliminates the need for a lift span
- The addition of safety shoulders for stalled vehicles and incident responders
- Improved sight lines so drivers can see over the crest of the bridge, reducing the potential for rear-end collisions during congested periods
- Longer on-ramps and off-ramps to make it easier for drivers to merge onto traffic, and improve connections between interchanges
- Reducing congestion over the bridge compared to No-Build, by improving traffic operations, providing light rail and charging a toll to

cross the river.

Additional potential safety measures, such as eliminating interchanges or reducing posted speeds, were considered during earlier phases of the CRC project but were dropped from further consideration because they did not meet the accessibility goals of the project, did not meet highway design standards, and/or were not supported by the local jurisdictions.

B-023-004

The project would change some circulation patterns on local streets, but in general, by reducing congestion on I-5, and improving travel time reliability on the highway, traffic will be less likely to divert onto local streets. Therefore the project is expected to reduce cut-through traffic on neighborhood streets and potentially increase livability in neighborhoods adjacent to the I-5 improvements of CRC. This, and other effects on local streets, are described in Chapter 3 (Section 3.1) of the DEIS and FEIS. CRC is not intended to fix bottlenecks on I-5 south of the project area, such as the I-5/I-405 split. However, CRC would not exacerbate congestion at these locations because it would not increase the traffic volume traveling through this portion of the corridor. As discussed in the DEIS and FEIS (Section 3.1), this project would not increase daily traffic levels due to the toll moderating demand and the introduction of light rail increasing transit mode share. For additional information on impacts to Neighborhoods and Environmental Justice communities, please see Chapter 3 (Section 3.5) of the FEIS.

B-023-005

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