

SCANNED
Date 6-02-08
Initial MJ

County

DRAFT

June 2, 2008

Commissioner Jeff Cogen
Multnomah County, District 2
501 SE Hawthorne Blvd.
Portland, OR, 97214

RE: Columbia River Crossing

Dear Commissioner Cogen:



On behalf of the Sustainable Development Commission (SDC), we write to express several concerns about the proposed Columbia River Crossing (CRC) preferred alternative.

The SDC's charge to "develop and advocate for programs, policies, and actions by government, citizens, and businesses leading to sustainable communities in the Portland metropolitan area" compels us to draw your attention to potential conflicts of the CRC preferred alternative with local policies on sustainability and climate change. We also note that we do not have the expertise to speak to the safety or seismic issues associated with the existing bridge or the preferred alternative, and therefore those issues will not be addressed in this letter.

While we respect the long and difficult work of the CRC task force and staff, we are concerned that the data underpinning the CRC preferred alternative may be outdated or flawed. We base this opinion on the testimony of CRC staff to the SDC as well as on our observation of the changes in driver behavior and gas consumption over the past few months.

As you may know, bridge traffic over the Columbia River has decreased by at least 3 percent since February 2008.¹ Gas consumption on a per capita basis is down to 1966 levels.² Vehicle miles traveled (VMT) are down in Oregon, while transit use has increased.³ We believe these fundamental changes in behavior are occurring over a relatively short period of time because citizens are reacting to both high gas prices as well as a general increase in awareness of climate change.

During their presentation, CRC staff told the SDC that the regional data they used to predict the need for more lanes on the bridge used gasoline prices well below what we are currently experiencing. Because of this, we respectfully recommend that an independent panel be appointed to review the analysis and data used for the CRC modeling. We would like to see updated modeling that uses current gas prices (and takes into consideration that many predict gas prices to rise on a sustained basis consistent with the Peak Oil Task Force findings). It is our hypothesis that if gas prices continue to rise, VMT will fall more quickly than the CRC staff findings show, and that this might allow the region to scale back the project, saving taxpayer dollars and reducing greenhouse gas emissions.

One other critical policy issue was not addressed by CRC staff, and that is the likelihood of carbon regulation with the advent of a new administration in Washington, D.C. We believe that the emergence of a formal carbon market—nationally and/or regionally—will drive further reductions in VMT and an array of



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L-006-001
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L-006-002
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L-006-003



MULTNOMAH
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L-006-001

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

L-006-002

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 greenhouse gases, 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 3.19.8, 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

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L-006-003

other changes that may well affect the scale of this project. In fact, we strongly believe that every transportation project undertaken now and into the future must be viewed through the lens of our efforts to fight climate change and reduce greenhouse gas emissions 75 percent below 1990 levels by 2050, as required by Oregon law. This means a reduction well below current levels, and not simply a reduction below a forecasted business-as-usual future scenario.

As you know, the City and County are currently updating their joint climate-protection plan, and the initial analysis shows that the region must reduce vehicle miles per day to less than half of 2006 levels by 2050. We are concerned that such an extensive project as the CRC preferred alternative may not help us to achieve that goal, and may, in fact, increase our emissions overall despite the proposed provision of enhanced bike, pedestrian and transit features.

L-006-004

We want to communicate to you our strong support for the inclusion of the following into the CRC, no matter what the size and scope of the final project:

- Light rail transit (as opposed to bus rapid transit)
- Two 14-foot bike/pedestrian lanes (one line each way, rather than a single lane for bikes and pedestrians)
- Tolling and congestion pricing based upon time of day and frequency of use
- Sustainable stormwater management

L-006-005

L-006-006

L-006-007

L-006-008

Finally, given the rapidly changing landscape of climate-related policies at the local, state and federal level, it would be helpful to explicitly consider the option of starting with a preliminary bridge toll prior to any construction. This user-pay approach would start generating revenues targeted for needed improvements, would yield additional insight for trip modeling and would allow more time for comprehensive transportation and land use plans to be developed to meet our climate change policies.

At a minimum, we respectfully request that an independent panel -- with expertise in, among other things, climate policy, greenhouse gas emissions modeling, and oil price/supply volatility -- review the data and analysis of the CRC project prior to the CRC Task Force vote scheduled for June 24, 2008.

Best regards,

Leslie Carlson
Co-chair

Justin Yuen
Co-chair

¹"Bridge Traffic Down," the *Vancouver Columbian*, May 7, 2008.

²"Braking News: Gas Consumption Goes Into Reverse," *The Sighline Institute*, April 2008

³"Portland Mass Transit Fills 'Er Up," the *Oregonian*, May 11, 2008

cc:

Sam Adams, City of Portland Commissioner
CRC Task Force

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) 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 No-Build 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 crossing, reduced congestion, removal of bridge lifts, and lower accident rates, are all factors that contribute to lower GHG emissions with the project than without it. These factors will also make it easier for the region to meet goals for reducing GHG emissions.

See response to comment L-006-003 for more information on fuel prices.

L-006-003

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There is the potential that a carbon tax could occur at some time, but as yet there have been no such local, state or federal regulations and no

indications that such taxes would occur in the foreseeable future. The effect of such a tax on travel would likely be similar to that of other factors that raise fuel prices. In the long-term context of the proposed river crossing infrastructure (25 to over 100 years), short-term changes in fuel costs have little effect on long-term travel demand. The potential effects of peak oil (increasing price of petroleum temporarily reduces some trips but also accelerates transition to alternative fuel vehicles) are discussed in the DEIS and FEIS (Section 3.19). While the use of VMT as an indicator of GHG emissions continues to be discussed, there is growing concern in both the regional and national debate that future VMT may not actually be the appropriate metric for evaluating GHG emissions. Besides traffic volumes, traffic speeds play a large role in GHG emissions. More importantly, as the vehicle fleet is changing over time, the share of alternative fuel vehicles that produce very low or even no GHG emissions is growing. This transition would likely be accelerated with a carbon tax on gasoline or other factors that increase the price of petroleum.

L-006-004

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 light rail to Clark College as part of the project's Locally Preferred Alternative (LPA). For a more detailed description of the transit improvements associated with the LPA, see Chapter 2 of the FEIS.

L-006-005

Thank you for your input on appropriate widths for bicycle / pedestrian lanes. The project team has reviewed various recommendations and under the LPA, the new northbound bridge over the Columbia River would accommodate a multi-use pathway under the highway deck (See

Exhibit 2.2-14 in the FEIS). This path would be 16 to 20 feet wide, located within the superstructure above the bridge columns and below the bridge deck. The width of the pathway is dependant on the width of the bridge superstructure, which will be narrower if there are fewer lanes on the deck.

L-006-006

A variable rate toll based on time of day was evaluated in the DEIS and is a key element of the CRC project. It is unclear whether you support increased or decreased toll rates for those who cross the Columbia River frequently, however, proposed toll rates are not currently planned to be tied to crossing frequency.

L-006-007

As described in Chapter 3.14 of the FEIS, the LPA significantly decreases the amount of untreated stormwater entering surface waters in the project area.

L-006-008

Modeling has indicated that tolling I-5 without making the improvements that are part of the CRC project would not meet the project's purpose and need. However, this does not mean that some form of tolling prior to constructing CRC couldn't be implemented. The ultimate decision on any tolling options must be made by both the Washington and Oregon Transportation Commissions.

Independent expert review panels were conducted in October and July 2008, as noted in response to comment L-006-002.