From: Bill Scott
To: Draft EIS Feedback;
CC:
Subject: Comments on Draft EIS
Date: Sunday, June 29, 2008 10:07:29 PM
Attachments:

P-0526-001 I strongly urge that the Task Force direct the preparation of a Supplemental Draft EIS to address many points that are inadequately dealt with.

P-0526-002 My experience as the Director of the Oregon Economic and Community Development Department from 1993 to 2002 contributed to my strong conviction that it is imperative that Oregon and Washington take action to relieve the congestion on the I-5 Columbia River Crossing. Both freight and passenger travel on I-5 are critical to the economy of the Portland-Vancouver region.

P-0526-003 However, I am appalled by the inadequacy of the alternatives considered in the Draft EIS. I fear that the only result of this flawed document and process will be more delay, congestion and frustration, because the only alternatives being considered are unaffordable, legally vulnerable and inadequate to solve the very real problems.

P-0526-004 The real problem is that the only crossings available to serve local and regional trips are the interstate highways. Expanding the capacity of the interstate system to accomodate local trips will only induce more of the same. The Task Force has rightly called for a new transit/bike/pedestrian facility to accomodate many of the local trips, along with tolls that will inevitably depress trip demand.

Unfortunately, the alternatives being studied also dramatically increase interstate highway capacity at the same time, specifically to accomodate local/regional commute trips. If it were actually implemented, the effect of this muddled solution will likely be to offset the positive impacts of the demand management actions, resulting in no relief from congestion on Interstate 5 after many years of construction delays, following years of legal delays. In reality, the odds that we will ever actually fund this overgrown project are slim. I predict that the most likely outcome of the course you are on is that it will be aborted after years of delays and many more tens of millions of expenditures.

I urge you to do the right thing and pull the plug now.

P-0526-001

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. A supplemental draft is required if changes to alternatives after the draft are substantial and/ or if there are new significant impacts not previously discussed in the draft and/or there are changes in laws or regulations after the draft. The DEIS identified potential mitigation measures for all potentially significant as well as many non-significant impacts, and the FEIS further analyzes and develops mitigation measures and plans to a higher level of detail and refinement. CEQ NEPA regulations (40 CFR 1502.9(c)) do not require agencies to prepare a supplemental draft EIS just because an FEIS includes refined alternatives and additional information. Such changes are typical and expected in the planning process, and are consistent with CEQ and FHWA NEPA regulations. Between publication of the DEIS and FEIS, FTA and FHWA prepared three NEPA re-evaluations and a documented categorical exclusion (DCE) to complete changes in the project since the DEIS. The NEPA re-evaluations addressed the change in the project from: 1) the 17th Street transit alignment, 2) the composite deck truss bridge type, and 3) all other changes in design between the DEIS and the FEIS. The DCE addressed the impacts from the track work on the steel bridge.

Both agencies concluded from these evaluations that these changes and new information would not result in any significant environmental impacts that were not previously considered in the DEIS. For more information, see Appendix O of the FEIS.

P-0526-002

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

Staff should be directed to analyze alternatives that (1) take into consideration the forward-thinking policies of Oregon and Washington concerning reduction in carbon emissions and vehicle miles travelled; (2) separate true intercity trips from local/regional commute trips; (3) use alternative modes and demand management, especially congestion pricing, to the fullest possible extent; (4) do not constrain the project to protect Pearson Air Park or the existing configuration of the downstream railroad bridge (which could be reconfigured at much less cost); (5) require much less local investment.

It appears that the alternatives analyzed are based on a paradigm of highway design that has outlived any logic it ever had. It is time for this region to show that we truly understand the realities of 21st century transportation and land use: (1) our first priority should be to protect our existing infrastructure and manage demand to make it last; (2) new capacity investments should reflect the realities of global warming and peak oil, with incremental trips being served by the very most sustainable modes; (3) low-density suburban development should not be encouraged or enabled by our transportation investments.

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P-0526-003

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, FEIS, and Locally Preferred Alternative that are legally sound and effective at providing users of the I-5 corridor with multi-modal transportation choices.

Regarding project costs, the Columbia River Crossing project includes the replacement of the existing I-5 bridge over the Columbia River, improvements at seven interchanges over five miles of I-5, and the extension of light rail from Portland to Vancouver. The projected cost to construct this large and complex project are presented in Chapter 4 of the FEIS, and are estimated in year of expenditure dollars to account for inflation. The estimated cost to construct this project could be covered by a variety of sources. While a small portion of this cost is expected to be covered by local and state funds, federal funds and toll revenues are expected to cover the majority of the capital costs.

P-0526-004

The evaluation of the five alternatives in the DEIS was preceded by screening of a wide array of possible solutions to the CRC project's Purpose and Need. Chapter 2 (Section 2.5) of the DEIS explains how the project's Sponsoring Agencies solicited the public, stakeholders, other agencies, tribes and other experts for ideas on how to meet the Purpose and Need. This effort produced a long list of potential solutions, such as new transportation corridors across the Columbia River, various transit modes, tolling, other demand management measures, and techniques for operating the existing highway system more efficiently. After identifying this wide array of options, the project evaluated whether and how they met the project's Purpose and Need, and found that alternatives that do not include improvements to the existing I-5 facility

generally do little or nothing to address some of the identified needs, including reducing traffic congestion, improving the safety problems and reducing crashes on I-5. Traffic modeling showed that even significant investment in improving transit options in the I-5 corridor or building a third highway corridor, would not substantially reduce future traffic demand or address identified safety hazards. It is important to note that components were not eliminated simply because they did not expand highway capacity. Components that helped reduce travel demand without increasing capacity were also advanced for further evaluation. For example, bus rapid transit, light rail transit and tolling all help to decrease auto demand without expanding highway capacity. See Appendix C of the DEIS for an explanation and the results from early screening processes.