From: THOMAS BEVERLY WALSH
To: Draft EIS Feedback;
CC:
Subject: Interstate 5 Columbia River Crossing Project Draft EIS
Date: Monday, June 30, 2008 2:14:40 PM
Attachments:

P-0530-001
P-0530-002
P-0530-003
P-0530-004
P-0530-005

Government officials should not be planning projects which will bring about more motor vehicle traffic with its concomitant increases in air pollution, noise, extravagant energy consumption and decreasing neighborhood livability. An article in the *Oregonian* on July 22, 2008 stated that these environmental impacts of growth that will be brought about by the project were purposely ignored. This is a willful violation of the National Environmental Policy Act Regulations, 40 CFR 1502.15, 1502.16 & 1508.8. The DEIS must be redone and contain a description of these effects.

P-0530-006

Noise generated by a project should be inaudible to people and all other creatures beyond the boundaries of the land occupied by the project. Just because an agency, such as the Federal Highway Administration, says that there is no impact at some level or average level of noise does not mean that this is so. The Oregon Department of Transportation states that the exterior Leq at a residence must be 65 dBA for there to be an impact. Any level at 60 dBA or above is certainly high enough to interfere with conversation. Interfering with conversation at one's residence is certainly an impact. Furthermore, Leq and other devious averages such as Ldn are a poor way to present noise data. These averages are favored by organizations which have the conflicting tasks of both regulating and promoting activities which make a lot of racket. Examples of these entities are FHWA, ODOT, the Federal Aviation Administration, the USDA Forest Service and the Bureau of Land Management. Maximum levels as a function of time should be the data presented and should be the basis for determining impacts. For instance, if one in fact has to put up with 80 dbA for 2 minutes every hour, Leq for this annoyance is only 65 dBA - a significant but misleading reduction in numerical value.

P-0530-001

The CRC project will not increase traffic levels or energy consumption and will not decrease neighborhood livability. The LPA includes substantial changes to the river crossing's transportation infrastructure and operations (extension of LRT, addition of tolling, and elimination of bridge lifts) that would reduce, not increase, future automotive demand and petroleum use. The LPA would increase daily transit mode share and reduce the number of cars traveling over the I-5 bridges. This increase in transit usage and decrease in auto travel is expected to reduce automotive petroleum consumption. The reduction in congestion and accidents, and the elimination of bridge lifts would also improve fuel efficiency and thus further reduce petroleum use.

Regarding livability, 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 Chapter 3 [Section 10] of both the DEIS and FEIS). Noise impacts from I-5 traffic, with the mitigation proposed for the CRC project, will also be substantially lower with the LPA than with the No-Build Alternative. Noise from the light rail can be mitigated below FTA's noise impact criteria as well (see Chapter 3 [Section 11] of both the DEIS and FEIS). By reducing congestion on I-5 and improving travel time reliability on the highway, traffic will also be less likely to divert onto local streets.

P-0530-002

See comment above.

P-0530-003

See comment above.

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P-0530-004

Regarding noise and emissions, see response to comment P-0530-001. It is also true that with the introduction of light rail, better bicycle facilities, and a toll, the Average Daily Trips over the bridge will be reduced from the levels expected under the No-Build Alternative. The livability of residents along I-5 will also be improved as a result of greater personal mobility, an improved transit network, an improved network for walking and biking, less traffic cutting through neighborhoods, and the subsequent job creation that is expected to occur as a result of this major investment.

P-0530-005

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 summarizes 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.

P-0530-006

The guidelines and standards for analyzing and mitigating highway noise are established by the Federal Highway Administration (FHWA) and state departments of transportation (DOTs). The guidelines for transit noise are established by the Federal Transit Administration (FTA). Regarding project impacts, with the LPA and recommended mitigation, fewer highway noise impacts will be experienced relative to the No-Build Alternative. All moderate and severe transit noise impacts

would also be mitigated. Please see Chapter 3 (Section 11) of the FEIS for more discussion of noise impacts and mitigation.