

INTERSTATE CORRIDOR *Urban Renewal Area*

DATE: June 24, 2008

TO: Mayor Tom Potter
City Commissioner Sam Adams
City Commissioner Nick Fish
City Commissioner Randy Leonard
City Commissioner Dan Saltzman

PDC Chair Rosenbaum
PDC Commissioner Ferran
PDC Commissioner Kadri
PDC Commissioner Mohlis
PDC Commissioner Wilhoit

Columbia River Task Force
Portland Planning Commission

COPY: Bruce Warner, PDC Executive Director

FROM: ICURAC Co-Chairs Sheila Holden and Walter Valenta

SUBJECT: Columbia River Crossing – ICURAC Recommendations for the Locally Preferred Alternative

RECEIVED

JUN 24 2008

Columbia River Crossing

L-011-001

The Interstate Corridor Urban Renewal Advisory Committee (ICURAC) is an advisory committee to the Portland Development Commission (PDC) Board. On June 16, 2008 ICURAC held a special meeting to discuss the Columbia River Crossing (CRC) project. ICURAC requested this special meeting because a portion of this project is in the Interstate Corridor Urban Renewal Area and because many of the neighborhoods in the URA may be positively or negatively impacted by the project.

L-011-002

ICURAC invited representatives from the CRC to present an overview of the project and the current alternatives outlined in the Draft Environmental Impact Statement (DEIS). We also invited CRC Task Force members to make brief remarks about the project. At the conclusion of the meeting a majority of ICURAC members present voted to recommend Alternative 3: Replacement crossing with light rail as the Locally Preferred Alternative. A minority of the ICURAC members present supported an alternative that was not studied in the DEIS which would include light rail and demand management techniques such as tolling the existing bridges, but would not make changes to the freeway at the I-5 bridge and the interchanges leading to the bridge. The ICURAC members

L-011-003

L-011-001

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

L-011-002

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.

L-011-003

The evaluation of the five alternatives in the DEIS was preceded by an evaluation and screening of a wide array of possible solutions to the CRC project's Purpose and Need statement. Chapter 2 of the DEIS (Section 2.5) explains how the project's Sponsoring Agencies generated

- L-011-003** | supporting this alternative believe that it will help meet climate change goals and avoid shifting I-5 traffic congestion and associated noise and pollutants to new bottleneck locations.
- L-011-004** | In discussing the CRC project and developing recommendations for a Locally Preferred Alternative, we have identified several project elements that will need further discussion and development. Resolution of these issues is important to the ICURAC and our final support for the project is conditioned on how they are addressed. Issues of concern to the ICURAC and our comments/recommendations follow:
- *Bridge Design:* The ICURAC recommends that the CRC project continue to look for ways to improve the urban design elements of the new bridge. This is a very costly investment at a critical gateway to Oregon and Washington. We believe that this should be a beautiful, landmark quality bridge.
 - *Size:* The ICURAC believes that a stacked highway/transit bridge design provides the most cost effective approach. We are also supportive of efforts to identify the appropriate number of auxiliary lanes in the project area and thereby minimizing the footprint and associated impacts of the project on residents, businesses, and environmental and historic resources.
 - *Bike and Pedestrian Facilities:* The ICURAC supports the provision of much improved bicycle and pedestrian facilities as a part of this project. ICURAC recommends that to strengthen the connections with the local system and to provide a key missing link, that the CRC project include an extension of the pedestrian and bicycle facilities to include a first phase construction of the Bridgeton Trail between the I-5 bridge and Bridgeton Road.
 - *Tolling:* Many concerns about tolling were expressed by the ICURAC. The Committee recommends that if the Interstate Bridge is tolled that further consideration of a fair and equitable rate structure be examined. We also recommend that if I-5 is tolled, that tolls also be placed on I-205 to avoid congesting this parallel corridor.
 - *Marine Drive Interchange:* There may be opportunities to create more developable land and better local street connections to the Bridgeton and Kenton neighborhoods with a revised Marine Drive interchange. ICURAC supports further study of design alternatives for this interchange while maintaining the importance of the interchange as the highest volume freight corridor in the state of Oregon and avoiding impacts to the Expo as a regional trade and event center.
 - *LRT:* Traffic on Interstate Avenue is congested already and making left hand turns has been problematic. ICURAC recently partnered with the City to upgrade software to improve signal timing and synchronization with light rail trains. It is our understanding that MAX service will increase along with ridership. The next phase of the CRC process should analyze the impact of increased light rail trains in this corridor. Specifically we are looking for the project to identify how more trains will affect traffic operations on Interstate Avenue and the numerous cross streets in the corridor, and to propose mitigation measures to ensure that more congestion does not result.
- L-011-005** |
- L-011-006** |
- L-011-007** |
- L-011-008** |
- L-011-009** |
- L-011-010** |
- L-011-011** |
- L-011-012** |

ideas and solicited the public, stakeholders, other agencies, and tribes for ideas on how to meet the Purpose and Need. This effort produced a long list of potential solutions, many of which were non-auto oriented options such as various transit modes and techniques for operating the existing highway system more efficiently without any capital investment. After identifying this wide array of options, the project evaluated whether and how they met the project's Purpose and Need, and found that in order for an alternative to meet the six "needs" included in the Purpose and Need (described in Chapter 1 of the DEIS), it had to provide at least some measure of capital improvements to I-5 in the project area. Alternatives that did not include such improvements in the highway generally did not adequately address the seismic vulnerability of the existing I-5 bridges, traffic congestion on I-5, or the existing safety problems caused by sub-standard design of the highway in this corridor. Also, travel demand modeling and traffic analysis demonstrated that alternatives with substantially more transit service and only minor highway capacity improvements, had only marginal differences in transit ridership and auto demand, but had substantially greater congestion, emissions, and highway safety problems. Regarding climate change, 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 CO2 emissions with the project than without it. These factors will also make it easier for the region to meet goals for reducing GHG emissions. Beyond the CRC project, the I-5 Transportation and Trade Partnership Final Strategic Plan recommended a comprehensive list of modal actions relating to: additional transit capacity and service; additional rail capacity; land use and land use accord; transportation demand/system management; environmental justice; additional elements and strategies (such as new river crossings); and financing. RTC and Metro are tasked with initiating recommendations as part of their regional transportation planning role.

L-011-013

- *Sustainability:* The ICURAC recommends that the CRC project incorporate as many green building practices as possible and adequately address the issues of climate change that have been raised by the Coalition for a Livable Future and Metro.

L-011-014

- *Environmental Justice:* The ICURAC recommends that the project minimize impacts to North/Northeast Portland and mitigate any disproportionate impacts from the project on low income and minority populations.

L-011-015

- *Air Quality:* The ICURAC and many residents living close to the I-5 freeway continue to be concerned about the public health impacts of this facility. We are encouraged to hear that some long-term improvement in air quality may come to this corridor due, primarily, to requirements for cleaner burning vehicles and fuel. That said, asthma rates are higher in North Portland than in other areas of the region, and we continue to be concerned about air quality and the associated health impacts in this freeway corridor.

L-011-016

- *Enhancement Fund:* In addition to funding the required mitigation measures, the ICURAC recommends the CRC project establish a Community Enhancement Fund/Program. Such a fund was called for in the I-5 Partnership Strategic Plan which identified the need for transportation improvements in the project area. The I-5/Delta Park project established such a fund and we believe that the CRC project should replicate this important community development tool to lessen the impact to the affected neighborhoods of North/Northeast Portland that we serve.

L-011-017

- *Contracting and Workforce Hiring:* One of the most significant benefits of this project is the opportunity for local wealth and job creation resulting from this very large construction project. ICURAC strongly recommends that the agencies responsible for bidding and constructing this project hire and promote the use of local, certified MWESB contractors and include opportunities for apprenticeships for the local workforce. TriMet's light rail construction projects in the Interstate and I-205 corridors and on the Downtown project demonstrate that agencies can meet strong MWESB and workforce training goals.

L-011-018

- *Local Oversight Committee:* Because there are so many important issues to be finalized on this project the ICURAC urges the creation of a Local Oversight Committee to work with the CRC project to finalize the design, financing, and contracting approach for the project. We also recommend that local decision makers, and the community, have an opportunity to weigh in again on the project as the many important details are finalized.

L-011-019

Finally, as a part of our conversation about the CRC project, two additional transportation projects are recommended for further review by the Oregon and Washington Departments of Transportation:

- *Rose Quarter Bottleneck:* The improvements on I-5 at the Interstate Bridge and in the I-5 Delta Park area will not solve the well known Rose Quarter bottleneck problem. In particular, the southbound morning congestion resulting from this bottleneck will result in more idling vehicles adjacent to a very residential area.

Examples of current efforts include RTC's evaluation of future high-capacity transit in Clark County, and evaluation of needs for future river crossings. Regional planners have investigated solutions to existing bottlenecks at the I-5 connections with I-405 and I-84. It is anticipated there will be future projects aimed at fixing problem areas along I-5.

L-011-004

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

L-011-005

The CRC project design for interchanges, roadway elements, transit stations, and other facilities will be context-sensitive and reflect the unique character of the surrounding area. CRC formed a 14-member, bi-state Urban Design Advisory Group (UDAG), made up of design professionals and neighborhood representatives. All UDAG meetings are open to the public to attend and observe. Goals of the UDAG include achieving "design excellence that can be embraced by affected communities and users" and providing "a landmark bridge that is both inspired and inspiring and fully integrates the design and function of the structure with the urban design elements." Working closely with project designers, UDAG will provide input and guidance on integrating the new facilities with the surrounding community. This work includes identifying significant iconography (for example, symbols and patterns) that will reflect the history of the area, the Native American communities, early pioneers, or other significant themes. These images will be incorporated into an art master plan. Additional discussion of bridge designs can be found in Chapter 2 of the FEIS and in the Visual and Aesthetics Technical Report supporting the FEIS.

L-011-006

The Stacked/Transit Highway Bridge (STHB) option, which would allow

L-011-019

Addressing the problems in the Rose Quarter area deserves more careful consideration.

- *Commuter Rail:* The ICURAC recommends further investigation of the commuter rail as part of a long term solution to providing multi-modal options to cross the river.

Thank you for the opportunity to comment. We look forward to hearing how many of the issues raised in this letter are resolved.

transit, bicyclists, and pedestrians to travel beneath the highway bridge deck, was included as part of the LPA. The DEIS indicated that the two bridges required for this bridge option would put less bridge sub-structure in the Columbia River, likely resulting in less environmental impact. After publication of the DEIS, additional engineering studies were conducted that confirmed the feasibility of the STHB design.

The STHB is described in greater detail in Chapter 2 (Section 2.2) of the FEIS. Impacts associated with a STHB are discussed throughout Chapter 3 of the FEIS.

L-011-007

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 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.

L-011-008

As discussed in the DEIS and FEIS, a replacement bridge over the Columbia River will include dramatically improved bicycle and pedestrian facilities that will strengthen connections to the local system. The Bridgeton Trail has been designed to terminate on the east side of the Marine Drive interchange. The CRC project is completing an extensive bike and pedestrian network through this area. The project will connect to the terminus of the Bridgeton Trail, helping to extend this network through the interchange area.

L-011-009

As discussed in Chapter 3 (Section 3.5) of the DEIS and FEIS, tolling could impact low-income populations by introducing a new expense that could be proportionally a greater share of total income for low-income individuals, requiring that all users obtain transponders for electronic toll collection, and instituting a new tolling system that could be confusing or difficult to communicate to individuals with limited English proficiency. However, without a toll, the project likely could not be funded, or if funded, the new capacity on the bridge would be filled faster. Including a toll would reduce congestion, improve travel times, and could result in a slight improvement in air quality by reducing emissions, which would benefit all users. See Chapter 3 (Section 3.5) of the DEIS and Chapter 3 (Section 3.5) of the FEIS for a description of impacts and benefits of the project to EJ populations.

L-011-010

Traffic modeling indicates that tolling I-5, but not I-205, would divert some traffic to I-205 although most trips would remain on I-5. However,

under existing conditions, trips already divert to I-205 and would continue to do so under No-Build because of the unreliability of, and congestion in, the I-5 corridor. With the CRC improvements to I-5, many of those diverted trips would shift to I-5 because it would be a shorter and more reliable trip than I-205. Tolling the I-5 crossing causes some trips to shift to I-205 in order to avoid the toll. The net difference in the number of trips crossing on I-205 is only slightly higher with the CRC project than without it.

With few exceptions, federal statutes do not permit tolling of an existing interstate highway without associated improvements. FHWA does have pilot programs that allow state departments of transportation to apply for the approval to toll a facility. The project sponsors are not proposing to toll the I-205 crossing as part of the CRC project. It is possible that a toll could be placed on the I-205 crossing in the future separate from the CRC project. Section 3.1 of the DEIS and FEIS discusses the effects of the project on traffic levels in the I-5 and I-205 corridors.

In addition, tolling prior to or during construction can be used to manage demand and begin collecting the revenue. This is not currently proposed but could be implemented if approved.

L-011-011

Following the publication of the DEIS in May 2008, and the selection of the LPA in July 2008, the CRC project team established a Stakeholder Group to provide feedback on the function and design of the Marine Drive interchange. This advisory group was comprised of a wide range of stakeholders with strong interests in the final design of this interchange including Metro; TriMet; the Oregon Department of Transportation; the City of Portland; the Port of Portland; trucking and distributions companies; the Audubon Society; nearby property owners or operators, such as Diversified Marine and the Metropolitan Exposition Recreation Commission; as well as community members from the

surrounding Bridgeton, Kenton, and East Columbia Neighborhoods.

As discussed in Chapter 2 (Section 2.7) of the FEIS, working with this advisory group, the CRC project team conducted studies that analyzed the traffic operations, property impacts, and potential environmental effects for a range of potential interchange designs. The Marine Drive interchange design included in the LPA that is analyzed in the FEIS was developed with this stakeholder advisory group to balance many competing interests, including freight mobility, property impacts to nearby properties, and environmental impacts. More detailed information regarding this process and its outcome is available in the Marine Drive Interchange Alignment Recommendation Process: Final Summary Report and Stakeholder Recommendation, available online in the project's electronic library at www.columbiarivercrossing.org or by contacting the project office.

L-011-012

The potential of traffic impacts along Interstate Avenue has been assessed for the FEIS. Please refer specifically to the Traffic Technical Report prepared for the FEIS, which describes in great detail the intersection operations along Interstate Avenue.

L-011-013

Many decisions regarding construction materials and practices will depend on decisions regarding design, contracting, material availability and pricing, and other factors that cannot be finalized at this phase of project planning. However, Chapter 3 (Sections 3.12, 3.18, and 3.19) of the FEIS discusses sustainable construction practices and techniques that could be employed by the project to reduce the project's "carbon footprint". These and other options will be considered as the project moves forward into final design and construction, in order to reduce GHG emissions during construction. Chapter 3 (Section 3.19) of the

FEIS also discusses how the LPA would have lower emissions from operations than the No-Build Alternative.

L-011-014

Project design has been developed and refined to avoid, minimize, or mitigate impacts in all portions of the study area, including North and Northeast Portland.

See Chapter 3 (Section 3.5) of the FEIS for a discussion of impacts and mitigation related to Environmental Justice populations.

L-011-015

The air quality evaluation presented in the DEIS assessed how emissions would be expected to change by 2030 and how the project would affect emissions of pollutants regulated by state and federal standards as well as vehicle emissions that are not regulated. Oregon and Washington, as well as the federal government, have established ambient air quality standards for criteria pollutants. These standards are based on human health risks. The DEIS evaluation included an analysis demonstrating that the CRC project would allow the region to retain conformity with state and federal air quality standards for relevant criteria pollutants. See the Air Quality Technical Report for a detailed explanation of the state and federal regulations concerning air quality and the evaluation of how the project complies with relevant air quality regulations. See Section 3.10 of the FEIS for an updated explanation of the pollutants regulated by state and federal law.

The DEIS also evaluated how the project alternatives would affect emissions of mobile source air toxins (MSATs) from I-5 traffic. MSAT emissions from vehicles are not currently regulated. The evaluation in the DEIS found "that future (no-build or build) emissions of all pollutants would be substantially lower than existing emissions for the region and the subareas" (page 3-277). These reductions in emissions are largely

the result of on-going reductions in vehicle emissions that will occur with or without the project, and are based on standard assumptions regarding future vehicles and fuel. The anticipated vehicle emission reductions are based largely on regulation-driven improvements in fleet fuel efficiency standards and cleaner gasoline and diesel fuels. Any extraordinary improvements in fleet fuel efficiency or fuels would result in even greater emission reductions.

Projected reductions in vehicle fleet emissions would result in a 25% to 90% reduction in I-5 related criteria pollutant emissions over existing conditions, even with the anticipated growth in population, employment and VMT. In addition, the build alternatives would provide small further reductions in vehicle emissions at the regional level and for most pollutants in each of the subareas along I-5. CO and NOx emissions would be slightly higher with the project than with No-Build (but still lower than existing conditions) in the I-5 subarea between the SR 14 and SR 500 interchanges, as discussed in DEIS Chapter 3 (Section 3.10) and FEIS Chapter 3 (Section 3.10). The updated analysis conducted for the FEIS resulted in very similar findings to those in the DEIS.

L-011-016

The CRC project will not have a discrete and separate community enhancement fund, but community enhancements are a part of the project design. As engineering progresses, the project team will continue to evaluate the best method to integrate community enhancements, where feasible, into the project design. We are working with surrounding communities to support their goals and provide enhancements as part of the overall project design rather than establish a separate account for activities separate from the project. See discussion in Section 1.2 of the FEIS.

L-011-017

Both ODOT and WSDOT are committed to assisting qualified minority

and women-owned businesses to obtain design or construction related contracts for the Columbia River Crossing Project. While local contractors are welcome to apply, Federal contracts cannot dictate the use of local contractors. The construction phase for this project is anticipated to begin not earlier than 2013. Firms seeking to assist the CRC project in this next phase of work should first make sure that they are registered as a state certified contractor in either Washington or Oregon or both. Both ODOT and WSDOT have information on their websites about this process. Firms are also encouraged to contact the agencies directly to obtain certification and make sure they have all relevant information. Firms should stay current with project developments by signing up for e-Updates via the CRC website.

L-011-018

Following the close of the 60-day DEIS comment period and the selection of an LPA, a 10-member governor-appointed panel was formed to advise the Oregon and Washington DOT on project development for the CRC project. The Project Sponsors Council (PSC) was charged with advising the project on completion of the FEIS, project design, project timeline, sustainable construction methods, consistency with greenhouse gas emission reduction goals and the financial plan, as well as they number of lanes on the bridge. The PSC made recommendations after considering technical information, receiving input from relevant advisory groups and reviewing public comments. See Chapter 2 (Section 2.7) of the FEIS for details on the PSC's recommendations and Chapter 6 and Appendix B of the FEIS for a description of public involvement activities that occurred after the DEIS was published.

L-011-019

See response to comment L-011-007, above. RTC and Metro have the regional transportation planning role, including planning for future transit investments and interchange improvements that are outside the scope of the CRC project.