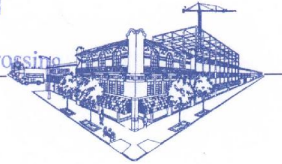


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JUN 13 2008

**E. D. Hovee****& Company, LLC**

Economic and Development Services

**B-036-001**

The project team has focused the evaluation of traffic impacts from CRC on the I-5 corridor, but has looked at regional impacts too. Current traffic patterns indicate that the 5 mile segment of I-5 around the river crossing, which is the area of the CRC project's improvements, influences a larger portion of the I-5 corridor extending to downtown Portland, as well as the adjacent I-205 corridor. Downtown Portland is a key destination for commuters living in Clark County who travel over the I-5 bridges, and I-205 is the only alternative north-south corridor that crosses the river in this region. Therefore, the DEIS and the FEIS analyze traffic performance, including duration of congestion, traffic volumes, and speeds along a 23-mile segment of I-5 between downtown Portland and northern Clark County and the I-205 river crossing. Local roads and highways adjacent to CRC's I-5 improvements are also included in this analysis. Traffic patterns on other highways in the region, such as US 26, are largely outside the influence of this project, though are included in the regional travel demand modeling that underpins the transportation analysis included in the DEIS and in the FEIS. Traffic performance on these highways is not discussed in the DEIS or FEIS because their performance is not meaningfully affected by CRC.

June 11, 2008

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

Subject: Comments on I-5 Columbia River Crossing Project Draft EIS

**B-036-001**

I am writing to provide comments on the DEIS for the I-5 Columbia River Crossing Project. These comments are focused primarily on economic development related effects for the Portland-Vancouver metro area that do not appear to have been adequately or fully addressed by the DEIS.

**1) Evaluation of transportation effects should not be limited to the portion of the I-5 corridor from Pioneer Street to I-84 but more fully address impacts to the larger regional transportation system.** For the metro area, the competitive issue for an interstate highway facility is primarily regional transportation capacity and through-put. Local arterial relief for the portion of the freeway in the immediate vicinity of the I-5 bridge is essentially a lesser consideration (especially if other more cost-effective or practicable local access and circulation alternatives are available).

The DEIS indicates that the I-5 bridge crossing may relieve pm peak congestion on I-5 from I-405 north while merely shifting the location of am peak congestion further south on the I-5 system. Not shown are implications for the greater, metro-wide freeway and arterial system, especially for travel times through the region – for freight and commuters.

At a minimum, the FEIS could better address broader regional implications by providing measures of regional transportation effectiveness such as:

- Changes in travel volumes, travel times and hours of congestion on *I-5 from Woodland to Wilsonville* – as well as shorter commutes as from downtown Vancouver to downtown Portland.
- Effects on travel volumes, travel times and hours of congestion on *other major regional freeway and arterial corridors* – as from Gresham to Hillsboro (on I-84 to US 26) or on alternative north-south arterials such as MLK, Interstate Avenue and Vancouver/Williams.

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**B-036-002**

**2) Rather than limit the alternatives considered to just two bridge crossings to access the metro area, the EIS process should more fully evaluate multiple bridge options.** Portland's economic history and sustained competitive advantage as one of America's most livable cities can be traced to multi-bridge options for crossing the Willamette River – with 10 bridge crossings extending from the St. Johns to Sellwood Bridge (and eight of these crossings serving one of the most economically vibrant central cities in the nation).

To suggest that the metro region can successfully follow a different path to regional economic development for crossing the Columbia River in the decades ahead deserves, at a minimum, more thorough evaluation in the EIS alternatives process than has occurred to date. This is for several reasons:

- A multi-crossing approach (implemented in phases over the next several decades) would make the region *less vulnerable* to the prolonged social and economic effects of a future bridge failure – whether due to human or natural causes.
- Added crossing(s) would serve to *remove unnecessary local traffic* from the interstate system – avoiding the incremental need for as much as six lanes to serve the short-haul traffic occurring between Vancouver, Hayden Island and North Portland.
- Separate new bridge crossing(s) could be *better targeted* to serve specific travel corridor needs – as for improved freight and work trip connections between the Ports of Vancouver and Portland and the U.S. Highway 30 industrial corridor.
- Developing at least one added new Columbia crossing ahead of major changes to the existing I-5 bridge structures would substantially *reduce or mitigate temporary effects* – which in reality could extend to become long-term social and economic losses associated with a prolonged I-5 construction period (addressed further below).
- \$4+/- billion of local and federal funding resources might be used more effectively on a series of *smaller scale, less disruptive* regional transportation improvements – including seismic upgrading of the existing bridge structures – at less cost and with greater sustained economic benefit than a single mega-bridge solution.

As this region increasingly turns from freeway-only solutions to multi-modal transport and street-community connectedness, offering innovative and multiple options for intra- and inter-regional connectivity becomes more critical than at any time since the World War II era. Supplemental bridge options have been suggested by others – including urban studies professor Will Macht at Portland State University and Robert Liberty on the Metro Council. Recommended is that at least one supplemental bridge option be considered as an added but equal alternative fully evaluated with the FEIS or as part of a supplemental SEIS process.

**B-036-003**

**3) Light rail and supportive streetcar development needs to be placed so as to best incent density of development.** The DEIS compares the high capacity alternatives primarily in terms of ridership, cost and business displacement. Although the DEIS notes that light rail transit (LRT) can be expected to stimulate more transit-oriented development (TOD) than bus rapid transit, more detailed comparison of the TOD effects associated with alternative LRT alignments is largely missing from the DEIS. Recommended is that the FEIS:

**B-036-002**

Many different options for addressing the project's Purpose and Need were evaluated in a screening process prior to the development and evaluation of the alternatives in the DEIS. Options eliminated through the screening process included a new corridor crossing over the Columbia River (in addition to I-5 and I-205), an arterial crossing between Hayden Island and downtown Vancouver, a tunnel under the Columbia River, and various modes of transit other than light rail and bus rapid transit. Section 2.5 of the DEIS explains why a third corridor, arterial crossing, and several transit modes evaluated in screening were dropped from further consideration because they did not meet the Purpose and Need.

Regarding a supplemental bridge alternative, the CRC Task Force – composed of 39 leaders from a broad cross section of Washington and Oregon communities – was tasked with advising the CRC project team, including federal sponsors, and providing guidance and recommendations at key decision points over the course of nearly 3 ½ years. Public agencies, businesses, civic organizations, neighborhoods and freight, commuter and environmental groups were all represented on the Task Force. The Task Force voted to develop a supplemental bridge alternative, in an attempt to find an alternative to total bridge replacement that would still meet the project's purpose and need but at lower cost and with greater reliance on managing demand with higher tolls and more transit service. The two most promising supplemental alternatives were considered in the DEIS. Based on the detailed analysis that followed, the Task Force recommended, and all project sponsors agreed, that the replacement bridge with light rail was the locally preferred alternative.

**B-036-003**

Thank you for taking the time to submit your comments on the I-5 CRC DEIS. In the appendix to the DEIS, the land use technical memorandum provided pages of detailed assessment of the TOD and land use impacts

B-036-003

- Incorporate more explicit and detailed comparisons of *TOD effects of LRT options* – to better assure that the alignment chosen actually works to reshape development patterns in Clark County rather than simply serving as the most convenient alternative available.
- Extend the evaluation to address options for *enhancing the LRT development + transportation effect* – with supplemental supportive transit service, especially streetcar.

B-036-004

**4) Carbon footprint savings will be realized less from the I-5 crossing investment than the reshaping of development that can occur in conjunction with regional transportation investments.** The DEIS appropriately notes relatively minor differences in carbon emissions between the alternatives evaluated. In part, this can be attributed to a shift in rather than substantial reduction of regional congestion for any of the alternatives evaluated with the DEIS. The conclusion of a relatively minor emissions effect speaks to the need for inclusion of added alternatives with the FEIS (or SEIS) that can offer more meaningful reductions.

More significantly, this lack of a difference occurs because the greatest carbon footprint effects are not to be found with a transportation investment viewed in isolation but in changes that the transportation investment facilitates in local and regional land use. As has been demonstrated for Portland streetcar, TOD can yield substantial carbon footprint savings (compared to the suburban development alternative) in terms of:

- *Reduced vehicle miles traveled (VMT)* – with more dense development (as the “trip not taken”); and
- *Lower CO<sub>2</sub> building footprint* – as measured both by embodied (construction) and operating (e.g. heating/cooling, electrical utilization and related) carbon emissions.

These broader effects resulting from the interplay of transportation and residential/employment development would be useful to address via more thorough evaluation of high-capacity transit (HCT) alternatives with the FEIS.

B-036-005

**5) Construction impacts deserve greater attention to better assure that what the DEIS describes as a temporary impact does not become a permanent effect.** The DEIS identifies substantial temporary impacts to SR 14/downtown Vancouver, Hayden Island and Marine Drive during construction, with less well-defined effects for other interchanges and over-crossings further from the bridge. Also noted with a one-sentence statement is that “half the peak weekend I-5 trips would need to be diverted to I-205 to keep an acceptable level of service on I-5” (DEIS, page 3-76). More complete evaluation of these impacts and resulting impacts to the region’s economy is warranted with the FEIS, including analysis to:

- More clearly address *duration of impact* – by interchange and travel corridor.
- Evaluate the degree of *lost business revenue* experienced – together with estimation of the numbers and types of businesses that may be most likely to relocate or cease operations.

of light rail transit. The FEIS has, as you recommended, continued the analysis with more detailed information about the location of light rail stations and alignments.

The DEIS was used to facilitate a decision on the Locally Preferred Alternative (LPA). But, with the completion of the DEIS, only certain decisions were made as a part of the LPA - bridge type, transit mode, transit terminus. Following on the LPA decision, the Vancouver Working Group was formed to develop a recommendation on the details of the transit service, including the alignment in downtown and the location of stations, as shown in Chapter 2 of the FEIS.

#### B-036-004

While climate change is not one of the problems this project seeks to address, it is nevertheless an important consideration because of the strong connection between transportation and GHG emissions. By causing more travelers to use transit or other alternative modes and improving the efficiency that cars and trucks operate in the project corridor, CRC provides a modest reduction in vehicular GHG emissions in this area. More significant gains may also be possible as a result of land use changes induced by this project. TOD is expected to occur around new light rail stations on Hayden Island and in downtown Vancouver. TOD can reduce GHG emissions by providing compact development and by encouraging greater use of nearby transit facilities. However, it is difficult to quantify the degree and precise nature of TOD that would be induced by this project and therefore tenuous to estimate GHG emission reductions from this development. FEIS does address this topic, but does so qualitatively rather than accounting for any emissions reductions in the GHG emissions analysis.

#### B-036-005

Throughout the planning process and through construction, the CRC project is committed to minimizing construction related environmental

B-036-005

- Assess potential *cumulative impacts* – such as long-term loss of regional competitiveness for distribution and manufacturing due to unreliability of Portland freight access and cost impacts experienced during construction.
- Provide *peer review* of the methodology and analysis used to assess economic effects of construction – for the alternatives as currently defined plus other options that might be assessed in conjunction with a potential supplemental alternatives (SEIS) process.

B-036-006

**6) Finally, and perhaps most importantly, travel demand forecasting does not appear to adequately account for changes in travel behavior that could dramatically reduce I-5 corridor VMT in the years ahead.** The first and most obvious change now underway comprises the effects that fuel price increases have already had on reducing I-5 crossing activity. More dramatic changes in travel behavior are yet to come as residents and businesses find themselves forced by economic necessity to make lifestyle adjustments in response to a sustained greater cost of intra- and inter-regional travel.

A second demographic change also merits added consideration in long-term VMT forecasts. That is to assess the potential for reduced travel (especially work commute trips) as baby boomers move into years of retirement with a subsequent lower proportion of the region's population at work.

B-036-007

**Concluding Observations.** For the reasons described above, the decision making process for the Columbia River Crossing would be better served by consideration of alternatives that have been put aside by the DEIS as presented to date.

Due to the previously unanticipated rapid rise in fuel prices and resulting flattening of travel demand, there is less need now to rush to conclusions based on what increasingly appears to be an outmoded transportation paradigm. Instead, the Portland-Vancouver metro region now has the opportunity to continue a pattern of national leadership in innovative solutions for transportation and economic development – toward the types of fine-grained, urban-centric communities offering sustained competitive advantage in the decades ahead.

I would be happy to respond to questions or requests for further information regarding any of these comments.

Sincerely,



Eric Hovee  
Principal

effects. Potential temporary effects, and potential measures to avoid/reduce those effects, were described in each section of Chapter 3 of the DEIS. Measures the CRC project proposes to mitigate these effects are described in each section of Chapter 3 of the FEIS. These mitigation measures have been developed through consultation with federal, state, and local agencies, and community stakeholders. These measures are intended to ensure that construction activities will comply with regulatory requirements and will minimize impacts to people living and working in the project area during construction.

Additional information on temporary impacts will be developed after the publication of the FEIS. The NEPA process does not allow a project to complete more than a 30% design. Similarly, the staging and construction plans have not been fully developed to be included in the FEIS. Instead the DOT's and the transit agencies will continue to work with citizens, business owners, and people like yourself, throughout the later design and construction periods.

#### B-036-006

The FEIS includes an evaluation of how gas prices and petroleum supply may affect travel demand. However, as discussed in Chapter 3 (Section 3.19) of the FEIS, factors such as increasing fuel efficiencies, alternative fuels, and increasing population size may counteract the effect of increasing gas prices. Regarding demographic trends, these are accounted for in the analysis, and despite an aging population, long-term regional job growth is anticipated.

#### B-036-007

Significant increases in oil prices can have both short term and long term effects on travel behavior. In the short term, the options for responding to rising gas prices are more limited, and include driving less and/or changing from driving to walking, biking or transit for at least some trips. During recent increases in gasoline prices transit use increased and off-

peak highway travel decreased. Peak period highway travel changed little.

Over the long term, there are more options for adjusting to changes in gasoline prices, besides changing driving behavior. Technological advances and legislative mandates can increase fuel efficiency standards in the long term. In turn, as older vehicles wear out, more consumers can replace them with more fuel efficient vehicles. Automobile manufacturers are developing and will continue to develop new vehicle and engine technologies that require much less, or even no, petroleum-based fuels. This trend is already happening as evidenced by the growing popularity of gasoline-electric hybrid and small electric vehicles.