

From: [Jeremiah Baumann](#)
To: [Columbia River Crossing; Draft EIS Feedback;](#)
CC: ["Mara Gross"; Fuglister, Jill; Bob Stacey; ronb@donavoncards.com; FredTrain@aol.com;](#)
Subject: Environment Oregon comments on CRC DEIS
Date: Tuesday, July 01, 2008 3:01:20 PM
Attachments: [EOComments.CRCDEIS.7-1-08.pdf](#)

Please find attached, and pasted below, comments by the Environment Oregon Research and Policy Center on the DEIS for the Columbia River Crossing Project.

Comments on the Columbia River Crossing Project

Draft Environmental Impact Statement

Date: June 27, 2008

O-024-001 Global warming is the paramount environmental challenge of our time. Reducing global warming pollution has been a priority of the city of Portland since the early 1990s, and Portland has led the way, with green buildings, public transit and other strategies contributing to national and international recognition for achieving its first global warming pollution reduction targets. Environment Oregon's main focus in recent years has been on encouraging the entire state to follow the Portland metro area's lead and the state of Oregon, with global warming a top priority of Governor Kulongoski, is now a leader in its own right. Our Clean Cars program will require new cars to reduce emissions 30% by 2016 and our Renewable Energy Standard, one of the nation's strongest, will require Oregon utilities to generate 25% of our electricity from renewable energy by 2025.

It is fortunate that Portland and Oregon have done as much as we have to date, but these steps are just the beginning of what will be needed for our region to reduce global warming pollution by the amounts scientists have determined are necessary if we are to stabilize our climate and prevent the most catastrophic consequences of global warming.

Oregon's goals for reducing global warming pollution are intended to achieve these reductions: we need to reduce our pollution to 20% below 1990 levels by 2020 and 75% below 1990 levels by 2050.

We cannot afford any investment in a transportation project of this size unless it makes a

O-024-001

Please see the climate change section in the DEIS and FEIS Chapter 3 (Section 3.19). Greenhouse gas (GHG) emissions have been estimated and numerous state policies and goals have been considered. While the LPA would reduce GHG emissions compared to the No-Build Alternative, it would not by itself reduce GHG emissions enough to achieve state-wide goals. That will require the combined reductions of many different actions.

O-024-001 Significant contribution to meeting these goals. A 12-lane replacement bridge, with or without transit and tolling, is not consistent with these goals. The Draft Environmental Impact Statement does not include sufficient analysis to recognize this conclusion, nor do any of the proposed options appropriately take global warming pollution reduction goals into account.

O-024-002 As context, transportation sources account for roughly 40% of Oregon's global warming pollution—tied with electricity-generating power plants as our biggest source. To reduce global warming pollution from the transportation sector, we have to use each of three strategies:

• Making cars go farther on a gallon of fuel,

• Switching to cleaner fuels (such as electricity or sustainable biofuels), and

• Reducing our dependence on cars by reducing vehicle miles traveled.

Each of these strategies is critical, because each of them is necessary. According to an analysis by our organization, to reduce global warming 20% by 2020 nationally, if we achieved 40 miles per gallon by 2020 and reduced the carbon content of fuels by 10%, we would still need to stabilize vehicle-miles traveled at current levels. From a transportation planning perspective, reducing vehicle miles traveled is the primary strategy any major transportation project must focus on.

When it comes to reducing vehicle miles traveled in our region, the Columbia River Crossing project's current alternatives are fundamentally unacceptable, because the project is planning for a future involving a 40% increase in vehicle traffic over the next 20 years, according to the "Purpose and Need" section of the Draft Environmental Impact Statement (DEIS).¹ It is simply not possible for this increase to happen and for our region to meet its global warming pollution reduction goals at the same time. The proposed project would be a \$4 billion plan to build for a future that we already know is not sustainable.

Of course, it is possible—in fact, it is entirely achievable—to spend \$4 billion changing this projected future and reducing our region's dependence on the car. This would not only be a major step forward for the region's efforts to address global warming, it would also be a true model for the nation to follow.

Unfortunately, none of these goals appear in the project's statement of purpose and need.

O-024-002

Based on 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 crossings, 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 greenhouse gas (GHG) emissions.

While there was no standard threshold or standardized methodology for estimating GHG 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. Chapter 3 (Section 3.19) of the DEIS 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 Metro Council and Portland City Council requested the CRC project team secure 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 DEIS, but the basic conclusion that the LPA would have lower emissions than No-Build Alternative remains unchanged.

The CRC project embodies nearly all of the Governor's Climate Change Integration Group's recommendations for planning transportation

O-024-003 The proposed alternatives do, of course, have some impact on this future. Backers of the Columbia River Crossing have noted, and rightly so, that this is the first major transportation project in the country to take global warming pollution into account and to include global warming analysis in its environmental analysis. They are also proposing public transit and tolling, two strategies that are critical tools for reducing vehicle miles traveled. These are the elements of the alternatives that should be preserved.

However, in the current proposals, public transit and tolling are used only as tools to mitigate what would otherwise be a project that causes a major increase in vehicles miles traveled. According to the DEIS, the combination of tolling and light rail would cut 47,000 vehicle trips from the projected increase, more than a 25% reduction in projected vehicle traffic. <!--[if !supportFootnotes]-->[2]<!--[endif]-->

This alone would be a profound step in the right direction. Unfortunately, the added lanes (in the replacement bridge with light rail option) will erase most of this progress—it is well-established that added capacity increases traffic—by adding 41,000 vehicle trips, reducing the gain to just a 3% reduction in vehicle traffic over I-5. <!--[if !supportFootnotes]-->[3]<!--[endif]--> Moreover, the project would cause a 1.4% increase in vehicle traffic on I-205, meaning the total impact on both bridges is a reduction in vehicle trips of a mere 0.76%. <!--[if !supportFootnotes]-->[4]<!--[endif]--> None of the options considered include the most important option: investing in strategies to reduce vehicle miles traveled while avoiding options that induce demand.

For \$4 billion, Portland, a national leader in sustainable transportation systems, can certainly do better than a 0.76% improvement.

O-024-004 Even more troubling is the fact that according to the task force projections, the region as a whole would in fact see a slight *increase* in dependence on the car, from a 39.8% increase in regional vehicle miles traveled under the no-build scenario to a 39.9% increase under the proposal. <!--[if !supportFootnotes]-->[5]<!--[endif]--> For \$4 billion, we certainly shouldn't be making things worse, even by this small margin. The Draft Environmental Impact Statement is flawed in not even assessing impact on total regional vehicle miles traveled, particularly when other CRC task force documents reveal that such analysis has been done.

It should be noted that the Columbia River Crossing could be an opportunity. The challenge of reducing our dependence on the car is the kind of sustainability challenge on which the Portland metro area thrives. In fact, we've already been reducing vehicle miles traveled in our region. A new Columbia River crossing could be a major investment in new transportation options and sustainability, a national model for how transportation planning should happen as we transition to a world of major cuts in global warming pollution. Unfortunately that opportunity is not among the options presented by the task force.

projects to reduce GHG emissions. These recommendations include highway tolling, relieving chronic highway bottlenecks, increasing transit, and increasing pedestrian and bicycle facilities. Meeting the legislative goal to reduce future statewide emissions below 1990 levels will require numerous actions in all sectors. There is no requirement or expectation in law or policy that any single action by itself should or can have the effect of reducing future emissions below existing emissions. Such broad reductions can only result from a wide variety of actions. As stated in the DEIS, the preferred alternative by itself would reduce GHG emissions compared to No-Build Alternative. This helps move GHG emissions in the right direction, and when combined with other actions, can play an integral role in helping the state meet its overall greenhouse gas reduction goals.

O-024-003

By 2030, the region's population is expected to increase by one million people. This increase will result in more people needing to travel between home, work, school, recreation, etc. In 2005, 135,000 vehicles crossed the Columbia River on the Interstate Bridge, which led to 4-6 hours of congestion each weekday. By 2030, 184,000 are predicted to cross the river, which would lead to 15 hours of daily congestion if no action is taken.

Congestion occurs when vehicle demand is greater than a transportation system's capacity. It results in slower speeds and increased travel times. CRC defines congestion as vehicles traveling less than 30 mph. The Columbia River Crossing project uses information gathered from Metro's nationally-recognized travel demand models to determine the project's effect on congestion. These models predict trip frequency, types or modes of transportation, destination, and time of day. Transportation planners use these models to analyze the effects of such factors as increased population and employment, transportation improvements, and new developments on the transportation system.

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<!--[if !supportFootnotes]-->

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<!--[if supportFootnotes]--><[1]--> Interstate 5 Columbia River Crossing Project Draft Environmental Impact Statement and Draft Section 4(f) Evaluation, Chapter 1, "Project Purpose and Need," May 2008.

<!--[if supportFootnotes]--><[2]--> Interstate 5 Columbia River Crossing Project Draft Environmental Impact Statement and Draft Section 4(f) Evaluation, Chapter 3, "Existing Conditions and Environmental Consequences," May 2008.

<!--[if supportFootnotes]--><[3]--> Ibid.

<!--[if supportFootnotes]--><[4]--> Ibid.

<!--[if supportFootnotes]--><[5]--> Columbia River Crossing Task Force Questions & Answers. Downloaded from www.columbiarivercrossing.org June 5, 2008.

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Environment Oregon
www.EnvironmentOregon.org

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Based on the Metro model's past ability to predict transportation effects, the CRC project is confident in the data received from Metro and uses it to determine what impact the project will have on congestion. The improvements proposed by the project to the highway and seven interchanges will help better accommodate increased future vehicle traffic. New auxiliary lanes and longer on/off ramps will allow safer and more efficient merging and weaving to enter or exit the freeway. Narrow lanes and shoulders will be widened to current standards. Shoulders will be added where they are currently missing. All of these changes will improve the flow of traffic in the bottleneck area of the Interstate Bridge.

O-024-004

The DEIS evaluation found that the project, with a toll and LRT, would actually reduce the total daily volume of traffic using the I-5 and I-205 river crossings by approximately 3%. The FEIS analysis of the project has been updated to include an evaluation of how the CRC project would affect Vehicle Miles Traveled (VMT) (see Section 3.1). Rather than inducing sprawl, 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.

O-024-005

See responses to comments O-024-001 through -004.

O-024-005

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Draft Environmental Impact Statement**

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We cannot afford any investment in a transportation project of this size unless it makes a significant contribution to meeting these goals. A 12-lane replacement bridge, with or without transit and tolling, is not consistent with these goals. The Draft Environmental Impact Statement does not include sufficient analysis to recognize this conclusion, nor do any of the proposed options appropriately take global warming pollution reduction goals into account.

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For \$4 billion, Portland, a national leader in sustainable transportation systems, can certainly do better than a 0.76% improvement.

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² *Interstate 5 Columbia River Crossing Project Draft Environmental Impact Statement and Draft Section 4(f) Evaluation*, Chapter 3, "Existing Conditions and Environmental Consequences," May 2008.

³ *Ibid.*

⁴ *Ibid.*

⁵ *Columbia River Crossing Task Force Questions & Answers*. Downloaded from www.columbianvercrossing.org June 5, 2008.