


From: [Chris Hagerbaumer](#)
To: [Columbia River Crossing](#) 
CC:
Subject: OEC comments on CRC DEIS
Date: Tuesday, July 01, 2008 4:41:55 PM
Attachments: [OEC Comments on CRC DEIS.pdf](#)

Friends,

Attached are comments from the Oregon Environmental Council's Board of Directors on the DEIS.

Thank you for your hard work to date, and we look forward to a response.

Chris Hagerbaumer | Deputy Director
Oregon Environmental Council
222 NW Davis Street, Suite 309
Portland, OR 97209
503.222.1963 x102
chrish@oeconline.org | www.oeconline.org

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Oregon
Environmental
Council
It's Your Oregon

222 NW Davis Street
Suite 309
Portland, OR 97209-3900
503.227.1953
www.oecurline.org

Columbia River Crossing
700 Washington Street, Suite 300
Vancouver, WA 98660

July 1, 2008

RE: I-5 Columbia River Crossing Draft Environmental Impact Statement

Dear CRC Project Team:

O-027-001 The Oregon Environmental Council (OEC) appreciates the tremendous amount of work the project team has put into studying how to address transportation problems associated with crossing the Columbia River between Portland and Vancouver and producing a Draft Environmental Impact Statement (DEIS) that analyzes four build alternatives and a no-build alternative for the proposed Columbia River Crossing (CRC).

OEC works to protect people and the environment on many levels, including slowing global warming and improving air and water quality. We offer some observations below on the Columbia River Crossing in general and the DEIS specifically that are informed by our understanding of the interrelationship between transportation, land use and the environment. We believe a well designed and implemented Columbia River Crossing can achieve the economic, environmental and social goals that are essential to sustainable transportation.

OEC acknowledges and agrees that congestion on the I-5 bridge has serious repercussions for our local, regional, and national economy. Environmentally sound and efficient transportation options are important for all travelers crossing the river. In particular, alternative transportation modes and freight movement need to be addressed. In short, we agree that both states have a large stake in making safety and seismic improvements to the bridge, improving freight mobility, and providing citizens with reasonable access to the places they need and want to go.

The big question is exactly how to accomplish this, and how to do so in a way that meets other important societal goals. As always, the devil is in the details.

O-027-002 In 2007, the Oregon Legislature passed HB 3543, which requires that Oregon halt the growth of its greenhouse gas emissions by 2010. By 2020, Oregon must have achieved a reduction of at least 10% below 1990 levels, and by 2050 a reduction of at least 75% below 1990 levels, in line with the recommendations of the Intergovernmental Panel on Climate Change. Given that the transportation sector is responsible for about 38% of Oregon's greenhouse gas emissions and about 45% of Washington's greenhouse gas emissions, any future transportation investments must put both states on a path toward real progress in reducing global warming pollution. Doing anything less would be a colossal mistake with wide repercussions for our region's future livability and economic strength, as well as the health of the entire planet.

O-027-001

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

O-027-002

Please see the response to Comment O-035-037. See also responses below to specific points raised.

O-027-002 We appreciate the fact that the project team recognizes the need to address global warming. We note that the DEIS describes a number of measures to mitigate the project's impact on our climate. However, looking through a global warming lens, we believe the region has more work to do before adopting a CRC project that would build six lanes in each direction. We do not believe an adequate range of alternatives has been assessed in the DEIS. Specifically, we believe that a "global warming" alternative (or alternatives) needs to be added in the Final EIS. Such an alternative(s) would specifically address the following six points related to global warming and other critical issues:

O-027-003 1. Oil prices hit a record high this June, and gas prices are averaging \$4 a gallon nationwide. These high prices at the pump are changing drivers' behavior. For example, as reported in the Wall Street Journal on May 30, 2008, riders are swamping public transit. The fact is: oil is a finite resource, and if the world has not already reached peak production of oil, it certainly will during the early lifetime of this project. In other words, the trend toward higher gas prices and greater changes in driver behavior is here to stay. With this in mind, OEC believes we need a new analysis of traffic demand in the corridor before making any decisions about the CRC. This analysis should take into account that cars may be fueled with something other than petroleum fuels; but even under an alternative fuels scenario, we believe it is highly unlikely that there will be as many auto trips as the current analysis indicates. If fewer auto trips are expected, fewer lanes can be built.

O-027-004 2. OEC agrees with OTC Commissioner Gail Achterman's assertion in a letter posted on the CRC website that it is unrealistic for a single project to bear the responsibility for needed greenhouse gas reductions and that we will only achieve this goal through system-wide policy changes. To us, this statement underlines the point that the CRC proposal needs to be evaluated in a broader context. For example, given that the project assumes increased VMT, as described in the DEIS, what assurances do we have that the region will reduce VMT elsewhere in order to meet our greenhouse gas goals? Thus decisions about the CRC should be made in the context of the Portland Comprehensive Plan and the Regional Transportation Plan updates that are both underway. The CRC also needs to demonstrate a new transportation paradigm in response to the Governor's transportation and global warming initiatives.

O-027-005 3. The CRC's impact on future land uses must be evaluated. We are concerned that easier access to jobs in Portland will fuel unchecked growth in Clark County, leading to greater sprawl and more vehicle miles traveled. However, if Clark County commits to economic development policies that provide more job opportunities to local residents and growth management policies that inspire compact urban development, these fears would be allayed. The analysis should outline Clark County's commitments to smart growth.

O-027-006 4. It strikes us that the "Bridge Influence Area" described in the DEIS is too small. Changes to traffic movement on I-5 will greatly influence traffic further south on I-5 (for example making the bottleneck at the Rose Garden even worse), and the interconnectedness between the I-205 bridge and I-5 bridge cannot be understated. The Bridge Influence Area should be expanded so that decision makers have a better understanding of the relationship between this project and other bottlenecks in the region.

O-027-003

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.

O-027-004

The CRC project has been developed and will continue to be developed within the context of relevant local and regional plans, including any relevant changes in the Portland Comprehensive Plan and the Regional Transportation Plan.

Regarding consistency with the Governor's transportation and global warming initiatives, please see the response to comment O-035-037. As discussed in Chapter 3 (Section 3.1) of the FEIS, the LPA reduces VMT relative to the No-Build Alternative. Such VMT reductions, however, are only one measure for reducing greenhouse gas emissions. The LPA also reduces chronic highway bottlenecks, reduces crashes, and

- O-027-007** 5. A more in-depth analysis of the air quality impacts of the project is warranted. While the DEIS notes that none of the alternatives being proposed are expected to violate federal or state standards for criteria air pollutants or hazardous air pollutants, scientific evidence is growing that air pollution harms people at levels even lower than the current federal maximum allowable levels and that air pollutants do not act in isolation, but rather cumulatively. It is important to the health of residents of the region and to those who live in close proximity to I-5, in particular, that we choose the project design resulting in the least amount of air pollution. This is an environmental justice issue as well as a health issue given that the project is located near neighborhoods with a high proportion of lower-income residents and people of color. OEC therefore encourages project design that foresees and adheres to stricter standards than current federal requirements. Lower maximum allowable levels are likely to be adopted in coming years because of emerging scientific evidence.
- O-027-008** 6. We would like to see a more thorough analysis of how freight mobility will be improved with a refigured corridor. Goods movement is essential to the region's economy, but inefficiencies in the system are impacting our climate and harming our environment. Nationally, freight movement is responsible for approximately 20% of the transportation sector's CO2 emissions. As mentioned in the DEIS, truck-hauled freight in the Portland-Vancouver region is forecast to grow from 67% of total freight movement in 2000 to 75% in 2035. In order to reap positive economic and environmental effects, the project must improve truck mobility, and this should be accomplished in part by increasing freight rail capacity.
- O-027-009** 7. Finally, given the price tag of the project, OEC is concerned that funding a project this large comes with huge opportunity costs. We recognize that a certain portion of the expected funding for the project will not be available to the region for anything but the bridge, but a good portion of the funds needed will come from citizens on both sides of the river and could negatively impact the region's ability to preserve the roads we already have and fund other transportation and environmental solutions in the region. Our sense is that the realized costs by taxpayers in the region will be significant – so significant that public support will be difficult to achieve. We urge a more in-depth analysis of how the state and local match will be achieved and how spending on the CRC will impact the region's ability to fund other transportation improvements.
- O-027-010** OEC suggests that peak period pricing be applied to both the I-5 and I-205 bridges in advance of building additional lane capacity. We recognize there are political barriers to tolling and valid concerns about equity, but doing so could successfully relieve congestion in an equitable, cost-effective manner and would demonstrate how much additional lane capacity, if any, is needed.
- O-027-011** OEC would also support a phased approach that focuses initially on alternative transportation to assess the need for capacity increases.
- O-027-012** No matter what the size and scope of the final project, OEC strongly supports inclusion of the following into the CRC:
- Robust transit options. Transit improves mobility for seniors, people with disabilities and people with limited incomes.

eliminates bridge lifts, actions that will also help reduce greenhouse gas emissions.

O-027-005

The construction of the CRC project is not intended to be a substitute for creating jobs in Clark County. The project's improvements for freight, reliability and transit access are expected to stimulate economic activity and job growth. The economic analysis indicates that job growth in Vancouver and at the Port of Vancouver will benefit from the project. The construction of the project itself will also provide jobs to workers in Clark County. Vancouver, Clark County, the Columbia River Economic Development Council, and other organizations work together to increase the jobs to population ratio in Clark County.

O-027-006

Over the course of the CRC project, the project team analyzed a variety of geographic areas. The boundaries of these areas were designed to meet specific purposes, such as analyzing the impacts of project alternatives. The boundaries of the Bridge Influence Area (BIA) were developed by the Portland/Vancouver I-5 Transportation and Trade Partnership as a way of determining how effectively project components and alternatives met the project's Purpose and Need. The project area extends from approximately Columbia Boulevard in the south to SR 500 in the north, along the I-5 corridor. This did not, however, limit the extent to which impacts were evaluated. Analysis of traffic impacts south of the BIA on I-5 has occurred, as well as analysis of potential diversion of traffic to I-205.

Regarding I-5 traffic south of the BIA, the southbound traffic congestion that currently exists near the I-5/I-405 split will not be improved by either the CRC project or the Delta Park project. However, traffic analyses show the congestion will not be worse because of the Columbia River Crossing project. The main reason is that fewer cars are expected to

- O-027-013** | Adequate bike and pedestrian access, as recommended by the Pedestrian and Bicycle Advisory Committee and the Bicycle Transportation Alliance. Non-motorized options are far less expensive for households and help people get the exercise they need to stay healthy.
- O-027-014** | Significant investment in transportation demand management. TDM is a highly cost-effective way to reduce single occupancy vehicle travel.
- O-027-015** | A dedicated freight lane. The project must adequately address freight movement in the region.
- O-027-016** | Peak period pricing on both the I-5 and the I-205 bridges. Price signals are the most economically efficient way to manage demand.
- O-027-017** | Green infrastructure design that will preserve water quality and hydrology across the entire area impacted by the project.

O-027-018 | Transportation decision-making has become far more complex than in the past because society now recognizes that there are many unintended consequences associated with a primarily road-based system. We appreciate the work of the project team, and we believe the CRC could be an exemplary model for how to achieve global warming goals while providing for passenger and freight mobility. However, our sense is that the CRC could fail to win public support because of its tremendous costs and the potential deficiencies described above. Because we believe serious transportation needs exist in this corridor, we ask for further analysis not to derail the project, but to improve project assessment and design and thus project acceptance. Convening an independent panel to review the analysis would also help with public acceptance.

While OEC's comments address several questions and concerns about the current design of the project, we want you to know that our organization is excited about the prospect of a CRC that is a model for sustainability. We fully expect the region to be able to devise a crossing that meets the economic, environmental and social goals of the 21st century, and we greatly appreciate your continued work to ensure that it does.

Sincerely,



Cheryl Koshuta, Board President on behalf of the Board of Directors

cc: Columbia River Task Force
Oregon Transportation Commission
Metro Council
Portland City Council
Multnomah County Commission
Sustainable Development Commission
Matt Garrett, ODOT
Fred Hansen, TriMet

cross the river with the project in 2030 than without the project. This is due to the provision of improved transit service and tolling.

Regarding I-205, traffic modeling indicates that tolling I-5, but not I-205, would divert some traffic to I-205. However, under existing and No-build conditions, trips already, and would continue to, divert to I-205 because of the unreliability and congestion in the I-5 corridor. With the CRC improvements to I-5, many of those diverted trips would shift back 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. Thus the net difference in the number of trips crossing on I-205 is only slightly higher with the CRC project as without it. Section 3.1 of the DEIS discusses the effects of the project on traffic levels in the I-5 and I-205 corridors.

O-027-007

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 DEIS or FEIS for an 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 30% to 90% reduction in I-5 related 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 sub-areas 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 sub-area around the I-5 / SR14 interchange, 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.

There is no substantive or procedural need or purpose to be served in developing a supplemental EIS related to air quality. Impacts have been analyzed and disclosed in the DEIS and refined in the FEIS, and this information has been made available to stakeholders and decision makers.

O-027-008

The ability to move freight efficiently in the Vancouver/Portland region is critical to the overall health of our economy. As such, the CRC project is

designed to improve freight mobility on I-5, as well as make it safer and easier for trucks to get on and off I-5 to reach businesses and Port facilities. The Freight Working Group (FWG), comprised of representatives of the Vancouver-Portland metropolitan area's freight industry, met 22 times throughout the DEIS and FEIS development process to advise and inform the Columbia River Crossing project team about freight issues. The group provided insight, observation, and recommendation about the needs for truck access and mobility within the corridor; characterized the horizontal and vertical clearances, acceleration/deceleration, and stopping performance needs of trucks that must be accommodated; and provided meaningful comments on the effect of geometric, regulatory, and capacity changes on truck movements in the corridor. See Chapter 3 (Section 3.1) of the FEIS for detailed discussion of how the project increases freight mobility and access along I-5 and in the region.

O-027-009

As the only continuous north-south Interstate on the West Coast connecting the Canadian and Mexican borders, I-5 is vital to the local, regional, and national economy. The I-5 crossing also provides the primary transportation link between Vancouver and Portland, and the only direct connection between the downtown areas of these cities. As described in the DEIS, serious problems face this important crossing, including growing congestion, impaired freight movement, limited public transit options, high auto accident rates, substandard bicycle and pedestrian facilities, and vulnerability to failure in an earthquake. The fact that other important issues face our communities does not diminish the importance of addressing the problems plaguing the I-5 crossing.

CRC assumes funds allocated to other projects would remain dedicated to those projects, and anticipates needing to find new funds to finance the project. Funding for the project will come from a variety of sources including federal grants that would not be available to other

transportation projects in the region, State of Oregon, State of Washington, regional and local sources. In addition, it is assumed that the replacement bridge will be tolled. Please refer to Chapter 4 of the FEIS for a description of the current plans for funding construction and operation of the LPA.

O-027-010

Modeling has indicated that tolling I-5 without making the improvements that are part of the CRC project would not meet the project's Purpose and Need. This does not mean that some form of tolling prior to constructing CRC couldn't be implemented. The ultimate decision on any tolling option must be made by both the Washington and Oregon Transportation Commissions and legislatures. Tolling I-205 is not part of this project, but could be implemented separately if Oregon and Washington, in partnership with the Federal Highway Administration, determine it is needed to advance regional transportation objectives.

O-027-011

The evaluation of the five alternatives in the DEIS was preceded by an extensive 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 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. These options were evaluated for whether and how they met the project's Purpose and Need, and the findings were reviewed by project sponsors, the public, agencies, and other stakeholders. Alternatives that included only TDM/TSM strategies, or provided only transit improvements, would provide benefits, but could only address a very limited portion of the project's purpose and need.

This extensive analysis 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 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. The DEIS evaluated alternatives with more demand management (higher toll) and increased transit service with less investment in highway infrastructure improvements (Alternatives 4 and 5) compared to the toll and transit service levels included in Alternatives 2 and 3. The additional service and higher toll provided only marginal reductions in I-5 vehicle volumes, and they came primarily at the cost of greater traffic diversion to I-205. This analysis found that a more balanced investment in highway and transit, as represented by Alternatives 2 and 3, performed considerably better on a broad set of criteria.

O-027-012

The Locally Preferred Alternative includes extending light rail into Vancouver with a terminus at Clark College.

O-027-013

As discussed in the DEIS, a replacement bridge over the Columbia River will include dramatically improved bicycle and pedestrian facilities by providing:

- A new 16 to 20 foot multi-use pathway over the Columbia River completely separated from vehicle traffic due to the design of the Stacked Transit Highway Bridge
- Protections from traffic noise, exhaust and debris for pedestrians and bicyclists on the river crossing
- More direct connections on each side of the river, consisting of stairs, ramps, and elevators, as well as pathway extensions that

- connect in with existing or planned facilities and public transit
- Many new or enhanced sidewalks, bike lanes, and crosswalks near the bridge and throughout the project area

Since the publication of the DEIS in May 2008, and the selection of the LPA in July 2008, the CRC project team has continued to work with the Pedestrian and Bicycle Advisory Committee and project partners to refine route and facility design. The updated design, as described in Chapter 2 (Section 2.2) of the FEIS, is the outcome of a long collaboration process.

O-027-014

TSM/TDM projects, by themselves, would not solve the many problems identified in the Project purpose and need, including seismic vulnerability, poor bicycle and pedestrian facilities and connections, poor transit mobility, and substandard highway design features. However, the CRC project has considered a variety of TSM/TDM measures to complement the infrastructure improvements. See Chapter 2 of this FEIS for a description of the TSM/TDM measures currently proposed as part of this project.

O-027-015

Representatives of the Vancouver-Portland metropolitan area's freight industry served on the CRC project's Freight Working Group. The Freight Working Group worked with the project team to determine how best to accommodate freight needs in the crossing project. The Freight Working Group and project team analyzed a number of ideas, including truck-only lanes in the project area. It was determined that truck-only lanes tend to primarily benefit trucks traveling long distances. For truck-only lanes covering relatively short distances, the maneuvers required to enter and exit the truck-only lane limits their usefulness. Several of the region's major truck freight generators are accessed to and from I-5 in

the project area, such as the Port of Vancouver, the Port of Portland, and the Columbia Corridor. Truck-only lanes would not effectively benefit trucks traveling to and from these destinations. Rather than creating truck-only lanes, the CRC project will benefit truck freight through such actions as reducing congestion and redesigning interchanges so they are easier and safer for trucks to use.

O-027-016

See response to comment O-027-010.

O-027-017

Please see Chapter 3 (Section 3.14) of the FEIS for a discussion of efforts to preserve and protect the water quality and hydrology of surface waters impacted by the CRC project.

O-027-018

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 summarized in the "Columbia River Crossing Travel Demand Model Review Report" (November 25, 2008), available on request through the CRC project office.

In addition, following the public comment period on the DEIS, the CRC project team was requested by the Metro Council and Portland City Council to secure independent review of the greenhouse gas (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 this 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 GHG emissions than the No-Build Alternative remains unchanged.