#### 02390

# 1 of 2

P-0684-001

From:	NoEmailProvided@columbiarivercrossing.org
То:	Columbia River Crossing;
CC:	
Subject:	Comment from CRC DraftEIS Comments Page
Date:	Thursday, May 29, 2008 6:11:44 PM
Attachments:	

Home Zip Code: 97206 Work Zip Code: 97201

Person:

Other - pass through the project area and pay taxes that should go to better projects

Person commutes in the travel area via: Car or Truck

P-0684-001

 In Support of the following bridge options: Do Nothing

2. In Support of the following High Capacity Transit options: Bus Rapid Transit between Vancouver and Portland Light Rail between Vancouver and Portland

 Support of Bus Rapid Transit or Light Rail by location: Lincoln Terminus: Yes
Kiggins Bowl Terminus: Yes
Mill Plain (MOS) Terminus: Yes
Clark College (MOS) Terminus: Yes

Contact Information: First Name: Martha Last Name: Richards Title: E-Mail: Address: 6906 SE 48th Ave Portland, OR 97206

Comments:

**P-0684-002** Rising gas prices, the war in the mideast, worsening environmental conditions, and other

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.

#### P-0684-002

The Purpose and Need is based on extensive analysis of the existing and projected transportation problems in the I-5 CRC corridor, and reflects extensive feedback from the public and stakeholder groups. This includes analysis and input during the CRC study as well as the I-5 Transportation and Trade Partnership Study and Strategic Plan that preceded CRC. The Purpose and Need focuses largely on metrics that do not inherently require substantial, or exclusive, increases in highway capacity. The purpose statement is intentionally worded so as to allow 02390

- P-0684-002 related issues that we are now facing all suggest that we should be spending our transportation money on facilities that reduce reliance on the private automobile, not facilitate it.
- P-0684-003 As a result, the CRC range of options is deeply flawed. Because we know that most of the traffic on the bridge is Clark County commuters going to and from the Portland Metro area, if we focus on changing commuting behavior, we can significantly (and, yes, I do mean to use the word "significantly" and I do understand its legal ramifications) reduce congestion. First, implement tolling on the existing bridges to make drive-alone trips less appealing. Second, build effective high-capacity transit to facilitate the WA to OR commute. Third, improve the bike/ped connection to provide a range of transportation options. Because the proposed bridge design would induce new trips, I cannot support that option. This is no time to be encouraging people to drive more.
- P-0684-004 Not only will the new bridge create new trips, the proposed bicycle/pedestrian bridge design is inadequate and short-sighted. The motor vehicle lanes have been designed to accommodate future traffic volumes, but the bike/ped facility is only designed for today's bike/ped volumes. I understand that it is designed to AASHTO guidelines, but it is important to recognize that those guidelines do not consider capacity issues. That is, they assume that there will only be a few people out on a path at any given time, and do not provide any guidance for accommodating high volumes of cyclists or pedestrians. Portland's many bike/ped paths designed to AASHTO guidelines get maxed out during peak periods. It is simply short-sighted to assume that peak hour bike/ped volumes would be so low that the planned path will be sufficient.
- **P-0684-005** Finally, there's a nearby railroad bridge. If the freight community is so determined to improve freight capacity, let them lean on the railroad to improve that bridge.
- **P-0684-006** This is our chance to re-think our region's priorities. I for one believe that it is time to take responsibility for our actions, and to spend our transportation dollars on projects that will improve our environment, reduce our reliance on foreign oil, and make the area a pleasant place to live. A CRC that DECREASES motor vehicle usage and increases transit and bike/ped usage is the only one that I will support.

consideration of a wide range of solutions including demand management, transit, highway, tolling, and other options for addressing the stated needs. Following the development of the Purpose and Need statement, analysis of a wide range of alternatives, and input from the public, agencies and stakeholders on those alternatives and analysis, it became clear that that the Purpose and Need could not be met by any single type of improvement. It is best met by a multimodal alternative that improves highway, transit, and bicycle and pedestrian facilities in the I-5 corridor, and adds tolling to the highway river crossing.

### P-0684-003

2 of 2

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.

## P-0684-004

Thank you for your comment on bicycle and pedestrian traffic modelling. Rather than relying solely on AASHTO guidelines, the project considered several elements to accurately model future bicycle and pedestriran traffic.

Columbia River Crossing (CRC) staff, with input from the CRC Pedestrian and Bicycle Advisory Committee (PBAC), developed a methodology for forecasting year 2030 pedestrian and bicycle travel demand for an improved pedestrian and bicycle facility on I-5 across the Columbia River. The forecasts were developed to take into account the three primary factors related to pedestrian and bicycle demand: future land use, percentage of trips by mode, and walking and bicycling trip lengths.

Modeling included projected increases in population, employment and density throughout the I-5 corridor, including in downtown Vancouver, on Hayden Island and in North Portland, which will increase walking and bicycling trips along I-5 over the Columbia River. In addition, modeling reflected the likelihood that pedestrians and bicyclists may choose to walk and ride longer distances due to the availability of an improved multi-modal system, the cost of driving or taking transit, for health purposes, and other reasons.

#### P-0684-005

According to the Feasibility of Diverting Truck Freight to Rail in the Columbia River Corridor Technical Memorandum produced by CRC project staff in April 2006, trains cannot move smaller loads as costeffectively as trucks and may even be more costly for shipping distances under 500 miles. This is a key point, as the average trip distance by truck in the Portland/Vancouver region is 199 miles. While there are certainly some commodities that could shift form truck to rail in the region, it is probably a very minimal amount, probably not part of a consistent and regular shipment schedule, and would not significantly ease congestion along I-5 in the project area.

Additionally, the Vancouver-Portland region is the "last mile" for 85 percent of the freight traveling in the region. That is, goods are produced, assembled, and/or delivered within the region, and the overwhelming majority of the local shippers and customers are not located on a rail spur or within a rail/intermodal terminal. Even if there was a targeted effort to use railroads more frequently, the goods would need to travel by truck on regional roads and freeways to arrive at rail terminals. In fact, most of the goods produced or received from the rail system must drive those goods by truck to or from the rail lines; and, increased rail service would likely lead to greater use of trucks for this very reason.

#### P-0684-006

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

improve fuel efficiency and thus further reduce petroleum use. Regarding bicycle and pedestrian usage, as discussed in the DEIS, a replacement bridge over the Columbia River will include dramatically improved bicycle and pedestrian facilities by providing:

- A new multi-use pathway over the Columbia River
- Protections from traffic noise and debris for pedestrians and bicyclists
- 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
- New or enhanced sidewalks, bike lanes, and crosswalks near the bridge

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 refined design, as described in Chapter 2 (Section 2.2) of the FEIS, is the outcome of a long collaboration process.

Regarding the environment generally, the DEIS includes information on air quality as well as the natural environment. The air quality evaluation presented in the DEIS assessed how the project would affect emissions of pollutants regulated by state and federal standards. Oregon and Washington, as well as the federal government, have ambient air quality standards. These standards are based on human health, and provide thresholds that indicate when concentration of a pollutant could pose a health risk. This evaluation included an analysis to demonstrate this project would allow the region to retain conformity with state and federal air quality standards for Carbon Monoxide (CO). The CO analysis analyzed potential CO impacts at intersections where traffic volumes would be affected by the project. See the Air Quality Technical Report for

a detailed explanation of the state and federal regulations concerning air quality and the evaluation of whether this project could affect compliance with these regulations. See section 3.10.1 of the DEIS for an explanation the pollutants regulated by state and federal law.

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 relatively standard assumptions regarding future vehicles and fuel. The anticipated vehicle emission reductions are based largely on regulated improvements in fleet fuel efficiency standards, and regulated improvements related to cleaner gasoline and diesel fuels. Any extraordinary improvements in 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 criteria pollutants over existing conditions, even with the anticipated growth in population, employment and VMT. In addition, the build alternatives would generally provide further reductions in vehicle emissions at the regional level and for some of the sub-areas along I-5. Emissions would be slightly higher with the project than with No-Build in some sub-areas, as discussed in the DEIS Chapter 3 (Section 3.10) and the FEIS Chapter 3 (Section 3.10).

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.

The DEIS discussed the potential impacts of the project alternatives on

the natural environment, including fish and other aquatic and terrestrial species in Chapter 3 (Section 3.14) of the DEIS and also the Ecosystems Technical Report. Impacts to fish, wildlife, and habitat as a result of constructing the CRC project were similar among all alternatives analyzed in the DEIS. The DEIS analysis of potential impacts to threatened and endangered species was coordinated with the federal agencies that implement the Endangered Species Act – the National Marine Fisheries Service (NMFS) and the US Fish and Wildlife Service (USFWS), The analysis was also coordinated with the Washington and Oregon state departments of fish and wildlife. The ESA, as well as NMFS and USFWS, do not require the completion of a Biological Assessment prior to a DEIS. The information available in the DEIS and related technical reports aided the project's local partner agencies in selecting a LPA.

Since the publication of the DEIS, a Biological Assessment has been prepared that provides more detailed impact analysis for compliance with Section 7 of the Endangered Species Act. A copy of the National Marine Fisheries Service Biological Opinion is included as an appendix to the FEIS. It addresses hydroacoustic impacts and stormwater treatment and other potential impacts to species listed under the Endangered Species Act. See Chapter 3 (Section 3.16) of the FEIS for more discussion on environmental analysis and impacts.