

**From:** [fredtrain@aol.com](mailto:fredtrain@aol.com)  
**To:** [Draft EIS Feedback:](#)  
**CC:**  
**Subject:** Fwd: AORTA DEIS Comments (Part 2 of 2)  
**Date:** Tuesday, July 01, 2008 11:53:04 PM  
**Attachments:** [AORTA-DEISComments.doc](#)



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\Zipped AORTA CRC DEIS Documents.zip\Supporting Documents/23USC129-Sec.129-  
 TollsFromVlex.com.html Msg #723 - Multiple extensions are prohibited (Supporting  
 Documents/23USC129-Sec.129-TollsFromVlex.com.html) - File Blocked.

Dear Ms. Gundersen,

Attached is AORTA's detailed responses to the DEIS document

Fred Nussbaum, Strategic Planner  
 Association of Oregon Rail and Transit Advocates  
 Temporary phone: 503-936-6792

-----Original Message-----

**From:** fredtrain@aol.com  
**To:** [DraftEISfeedback@columbiarivercrossing.org](mailto:DraftEISfeedback@columbiarivercrossing.org)  
**Sent:** Tue, 1 Jul 2008 5:29 pm  
**Subject:** AORTA DEIS Comments (Part 1 of 2)

Dear Ms. Gundersen,

**O-034-001**

Attached are files of AORTA correspondence and supporting documents that we would like included in the DEIS record.  
 A cover memo is included below and with the attachment.

A CD with the same was also sent by US Mail this afternoon.

I will be emailing a document with detailed responses to the DEIS document later this evening before the midnight  
 deadline.

Sincerely,

Fred Nussbaum, Strategic Planner  
 Association of Oregon Rail and Transit Advocates  
 Temporary phone: 503-936-6792

(AORTA Letterhead)

**O-034-001**

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

**AORTA's Comments on the CRC DEIS**

<b>O-034-002</b>	<p><b>Biased Process</b></p> <p>Staff showed its persistent bias toward a replacement bridge when, at the 11/21/06 Task Force Meeting, it had prepared a slick 14 page PR brochure <b>Staff Recommendation for the Range of Alternatives to Advance for Further Analysis in the Columbia River Crossing Draft Environmental Impact Statement</b> that recommended one Replacement Bridge option with two transit flavors. The Task Force had not yet received the "Considerations ..." memo (p.44), the "Jim Howell Proposal" memo (p.82) or the final alternatives evaluation summarized in the PPT show on (p. 213).</p>
<b>O-034-003</b>	<p><b>Inflated Definition of Need</b></p> <p>Projected traffic increases unrealistic. Inasmuch as this inflated growth was used as a yardstick to reject viable alternatives because they did not provide allegedly sufficient freeway capacity, the DEIS must revisit those alternatives and reevaluate them on the basis of more realistic projections. In particular, CRC must revisit the multimodal, non-freeway supplemental bridge option (aka R-19, R-22 or Alternative 3), which was faulted for not reducing enough traffic or providing enough new capacity on I-5.</p>
<b>O-034-004</b>	<p><b>Biased Treatment of Alternatives</b></p> <p>The multimodal, non-freeway supplemental bridge option <b>AORTA</b> proposed was also faulted for not meeting the traffic safety concerns surrounding the existing I-5 bridges. Staff ignored the freeway safety improvements resulting from 1) greatly simplifying the Hayden Island ramps and 2) replacement of the substandard, short SR-14 to I-5 south ramp with a long merge ramp using the supplementary bridge. More realistic traffic projections would also reduce the safety issues.</p> <p>This critique also applies to the treatment of several other non-freeway supplemental bridge proposals.</p>
<b>O-034-005</b>	<p><b>Biased Treatment of Alternatives</b></p> <p>The multimodal, non-freeway supplemental bridge options were also faulted for not meeting the seismic concerns surrounding the existing I-5 bridges. Nothing prevented that package from being expanded to include seismic upgrade of those bridges.</p>
<b>O-034-006</b>	<p><b>Not a True Multimodal Approach</b></p> <p>As the alternatives analysis consistently ignored the proposals to include relatively low-cost modifications of the railroad bridge, which had been clearly and repeatedly demonstrated to remove most of the I-5 bridge lift issues, improve freight and passenger rail operations and eliminate the navigation hazards for barges. All evidence points to staff simply refusing to address this component, probably because they did not consider the railroad bridge very relevant to their freeway/HCT project, even though it is well within the BIA) there is no question that the BNSF mainline operates in the I-5 corridor and that huge volumes of freight and significant numbers of people are moved by trains on that mainline. (See also CRC treatment of TR-11 – Commuter Rail and discussions of freight rail).</p>

**O-034-002**

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 of the Columbia River, and several transit modes evaluated in screening were dropped from further consideration because they did not meet the Purpose and Need. For a general description of the screening process see Chapter 2 (Section 2.7) of the FEIS. It should be noted that every proposal received from the public was considered, and many of the proposals that were dropped from further consideration included elements that helped shape the alternatives in the DEIS.

**O-034-003**

Traffic forecasts reported in the DEIS and used to inform decisions on a locally preferred alternative were derived from adopted regional employment and population forecasts and state-of-the-art modeling and evaluation conducted by Metro, RTC and the project team, and reviewed by all project sponsor agencies as well as FTA and FHWA. In addition, an independent panel of traffic modeling experts was convened in October 2008 to review the modeling methods and findings. These experts concluded that the project's approach to estimating future travel demand was reasonable and that it relied on accepted practices employed in metropolitan regions throughout the country. These findings are summarized in the "Columbia River Crossing Travel Demand Model Review Report" (November 25, 2008). This independent review confirmed the approach CRC modeling used to address multiple variables that can affect travel demand, including gasoline prices, tolling, travel demand measures and induced development.

<b>O-034-007</b>	<p><b>Improperly Narrow Geographic Focus Masked Full Impacts</b></p> <p>By only focusing within the 5 mile BIA, the DEIS conveniently ignores the environmental and human impacts of displacement of congestion downstream of the BIA, areas that are already experiencing significant congestion</p>
<b>O-034-008</b>	<p><b>Tolling and High Intensity Transit Not Analyzed without a New Highway Bridge</b></p> <p>A true alternatives analysis also should have measured the effects of tolling and high <u>intensity</u> transit investments (HCT plus significant feeder service increases) in the absence of new highway bridge components (i.e. using the existing bridges). In other words, there should have been three additional scenarios, each with no new highway bridge and with 1) tolling only, 2) high intensity transit only and 3) both. This would have allowed measuring of the impact of these non-highway solutions on overall demand. The woefully inadequate analysis in the DEIS shows<sup>1</sup> that HCT and tolling reduce demand by 15% at the same time that capacity is increased on I-5. One could argue that tolling and improved transit would do an even better job in the <u>absence</u> of increased capacity on the freeway. Note: seismic upgrades and certain interchange removal and configuration changes could have been part of the above highway components.</p>
<b>O-034-009</b>	<p><b>Inadequate Documentation of Analysis of Alternatives not Carried Forward</b></p> <p>Documentation of the prior analysis and evaluation of alternatives is poor under <b>2.5 Alternatives Considered But Not Advanced</b> section (2-46 – 2-51). There is no listing there of the 12 alternatives that made it through Step B nor is are the reasons for elimination given. DEIS Chapter 2 p. 2-51 refers the reader to a separate <b>Development of the Range of Alternative</b> document for more details. Also, neither the DEIS nor the <b>Development of the Range of Alternative</b> document mention Alternative A+, although it was developed late in the process in March 2007 by the 4<sup>th</sup> Alternative Subcommittee of the CRC. (See <b>Alternative A+</b> elsewhere in this document).</p> <p>The <b>Development of the Range of Alternatives</b> (281 pp.) itself does not have the final alternative narrowing steps, only earlier analysis<sup>2</sup>. It is also not packaged with the DEIS and is concealed among various other documents in the CRC's online library.</p> <p>The actual filtering rationales are hidden in 11/29/06 Task Force Meeting Materials: <b>Criterion Performance Report</b> (93-149) and <b>River Crossing Recommendations CRC Task Force November 29, 2006 PPT</b> slideshow (213-234). This kind of non-transparency is unacceptable in a document that is a crucial decision-making tool. After all, it is the <u>alternative analysis</u> process and not just the conclusions that the public is supposed review and comment on.</p>

<sup>1</sup> Summarized in 3/11/08 CRC Powerpoint Presentation – Portland Planning Commission  
 CRCStaff#080311PPTPresentationToPDXPlngComm.pdf slide 59.

<sup>2</sup> These include: **Portland/Vancouver I-5 Transportation and Trade Partnership Final Plan** (7-135)  
**DRAFT COMPONENTS STEP A SCREENING REPORT** 4/19/06 (150-194)  
**DRAFT COMPONENTS STEP B SCREENING REPORT** 6/9/06 (196-231)  
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**O-034-004**

Please see responses to O-34-003 and O-34-005. Options without capital investments in I-5 did not reduce travel demand on I-5 enough to relieve congestion or fix the substandard design features that lead to safety problems.

**O-034-005**

Evaluation of the five alternatives in the DEIS was preceded by screening of a wide array of possible solutions to the CRC project's Purpose and Need. Chapter 2 (Section 2.5) of the DEIS explains how the project's Sponsoring Agencies solicited the public, stakeholders, other agencies, tribes and other experts for ideas on how to meet the Purpose and Need. This effort produced a long list of potential solutions, such as new transportation corridors across the Columbia River, various transit modes, tolling, other demand management measures, and techniques for operating the existing highway system more efficiently. After identifying this wide array of options, the project evaluated whether and how they met the project's Purpose and Need, and found that alternatives that do not include improvements to the existing I-5 facility generally do little or nothing to address some of the identified needs, including reducing traffic congestion, improving the safety problems and reducing crashes on I-5. Traffic modeling showed that even significant investment in improving transit options in the I-5 corridor or building a third highway corridor, would not substantially reduce future traffic demand or address identified safety hazards. It is important to note that components were not eliminated simply because they did not expand highway capacity. Components that helped reduce travel demand without increasing capacity were also advanced for further evaluation. For example, bus rapid transit, light rail transit and tolling all help to decrease auto demand without expanding highway capacity. See Appendix C of the DEIS for an explanation and the results from early screening processes. The DEIS analyzed the full range of reasonable alternatives, which included the four build alternatives, and variations on

<b>O-034-010</b>	<b>Biased Treatment of Alternatives</b> Alternatives dismissed because they did not involve adding capacity to I-5 were evaluated in isolation. The big build alternatives were always packaged with HCT, so that they could be declared "balanced", which automatically gave them brownie points with regard to such criteria as consistency w/ growth management.
<b>O-034-011</b>	<b>Improperly Narrow Definition of Influence Area</b> Alternatives that provided additional capacity parallel to, but not on I-5 were faulted for not contributing to capacity in the Bridge Influence area. Examples: 3/22/06 Draft Components Step A Screening Report alternatives RC-14, RC-16, RC-18, RC-19, RC-21, and RC-22.
<b>O-034-012</b>	<b>Insufficient Range of Alternatives</b> The fact that staff seriously proposed to go into the DEIS with basically one build alternative with two transit flavors (11/ 21/06 Staff Recommendation) not only indicated a predetermined bias toward a high capacity replacement freeway bridge, but also a flagrant disregard for the purpose of a DEIS.
<b>O-034-013</b>	<b>Insufficient Explanation of Traffic Impacts of Supplemental Arterial Bridge</b> Traffic impacts on downtown Vancouver of supplemental arterial bridge not fully explained. Assumptions and rationale needed. There appears to have been no investigation of various options for tying the north end of that arterial into SR-14, I-5 or the street network in Vancouver.
<b>O-034-014</b>	<b>Biased Treatment of Alternatives</b> CRC analysis of alternatives to a more capacious replacement freeway bridge consisted of trying to shoot holes in those alternatives at the earliest opportunity and not put any effort into optimizing those alternatives before measuring them up against each other. Example: Staff faulted Jim Howell's 11/8-23/06 <u>conceptual</u> proposals for failing to meet detailed engineering requirements (e.g. Introducing too sharp curves) <sup>3</sup>
<b>O-034-015</b>	<b>Biased Treatment of Alternatives</b> Statement that central Vancouver would not be economically benefited by increase of traffic due to a supplementary arterial bridge flies in the face of empirical evidence to the contrary. It is traffic streaming by on freeways that frequently does not benefit adjacent local street oriented businesses, like those in downtown Vancouver. <sup>4</sup>

<sup>3</sup> 1/23/07 CRC Memo to Jim Howell (see [070123-C-CRCAssessOfAORTA11-8-06Proposal.pdf](#)) in AORTAs 7/1/08 emailed/mailed set of documents for inclusion in the CRC DEIS record.  
AORTA-DEISComments.doc

each based on their individual components and various options. The range varied from No-Build to alternatives that provided varying levels of highway improvements, different high capacity transit modes, different transit alignments and termini, and different tolling options. Many other components and combinations were evaluated prior to beginning the DEIS, but were dropped when analyses and input indicated that they would not adequately meet the Purpose and Need.

The Western arterial bridge was evaluated during the screening process used to develop the range of alternatives but was dropped prior to the DEIS because it was insufficient at meeting the project's need to improve safety and reduce congestion at and around the I-5 crossing. The arterial bridge was evaluated in the final round of screening that preceded the DEIS in which 12 packages of components were developed to test their performance and impacts; the arterial bridge was included in package 3. Similar to other options without capital investments in I-5, the arterial bridge did not reduce travel demand on I-5 enough to relieve congestion or fix the substandard design features that lead to safety problems.

Though assumptions were made that several project components would not include seismic improvements to the existing bridges, this fact alone did not prevent your preferred solutions from being included in the LPA.

### **O-034-006**

Eliminating bridge lifts would provide a safety improvement. Relocating the BNSF railroad bridge swing span could reduce the number of times the I-5 bridge would need to lift, but it would not eliminate the need for bridge lifts. The I-5 bridge would still need to lift for regular monitoring and maintenance and for occasional taller vessels such as construction barges and high-mast recreational vessels. More importantly, simply moving the BNSF swing span, which is private property, would address only a small portion of the identified traffic safety issues, and almost

<b>O-034-016</b>	Note: In the current Portland Mall Project, officials have been willing to compromise transit operations due to an EIS finding that allowing traffic to drive by (but not stop) along the entire length of the Mall will benefit adjacent businesses. The Mall configuration established in 1977 had only provided auto access for 3 blocks at a time.
<b>O-034-017</b>	<p><b>Tolling and Transit Calculation Error</b></p> <p>The <i>Traffic Demands Reflect Multi-Modal Project</i> slide (#59) in the 3/11/08 CRC Powerpoint Presentation – Portland Planning Commission (see footnote 1), which we assume summarizes DEIS analysis elsewhere, seems to make the dubious assertion that tolling will have no impact on transit ridership and hence the diversion of I-5 trips.</p> <p>From the bar chart on slide 59: Without tolls, adding transit to the build alternative reduces traffic by 15,000 per day. With tolls, adding transit reduces traffic by 15,000 per day. Conclusion – tolls will have no effect on the attractiveness of transit. This is absurd.</p>
<b>O-034-018</b>	<p><b>Biased Treatment of Alternatives – Disappearance of Alternative A+</b></p> <p>Alternative A+ was developed as part of the 4th Alternative Subcommittee work (3/12/07 – 3/27/07). This alternative was suddenly dropped between the 3/19/07 and 3/26/07 meetings. There is no documentation as to why, except for the threat by the DOTs that they would withdraw their participation from (and presumably funding of) the project if it were pursued. The March 19th meeting packet contains a March 15, 2007 memo from Kris Strickler to the Fourth Alternative Subcommittee, defining option A+ and giving the CRC staff perspective.</p> <p>If one examines this memo, one will find both that A+ met the “purpose and need” of the project, and A+ was unacceptable to CRC staff. This memo makes this remarkable statement:  <i>If Option A+ is selected as the locally preferred alternative (LPA) it is unlikely that either ODOT or WSDOT would continue funding work on the project.</i></p> <p><i>Identified Interstate improvements would be prioritized, funded and built along with other highly needed improvements in each state.</i></p> <p>There is no written explanation as to why the state DOTs, which are both charged to be multi-modal agencies, would no longer be interested in the project, especially if interchange improvements, TDM actions and highway related actions were part of the project.</p>
<b>O-034-019</b>	<p><b>Public Misinformation</b></p> <p>AORTA has elsewhere discussed instances of misinformation by project staff and consultants<sup>4</sup>. Here is another example, relating to the potential for seismically upgrading the existing I-5 bridges. Source: <b>9/27/06 Task Force Meeting Materials</b><sup>5</sup>: <i>The panel determined that it is technically feasible to retrofit the existing bridges to a level of service that would meet “no</i></p>

<sup>4</sup> 112906\_TF\_MeetingMaterials.pdf p. 48

<sup>5</sup> See Testimony by Fred Nussbaum on Behalf of AORTA at the Columbia River Taskforce 6/24/08 (080624-A-FNTestimonyToCRCTaskForce6-24-08.pdf) in AORTAs 7/1/08 emailed/mailed set of documents for inclusion in the CRC DEIS record.

<sup>6</sup> CRC Online Library: 092706\_TF\_MeetingMaterials.pdf

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none of the other stated Purpose and Need for the proposed action as described in Chapter 1 (Section 1.3) of the DEIS and FEIS.

### O-034-007

The proposed new add/drop lanes (i.e., lanes that connect two or more interchanges) are used to alleviate safety issues associated with the closely spaced interchanges in the project area and are not designed to increase capacity generally on I-5. 68 to 75% of I-5 traffic enters and/or exits I-5 within the CRC project area, and these add/drop lanes provide space for this traffic to do so without disrupting cars and trucks traveling to destinations further north and south of the project area. The project does not propose to add lanes north or south of the project limits.

The DEIS evaluation found that the project, with a toll and light rail, 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 Chapter 3, 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. In 2010, Metro ran the MetroScope model (an integrated land use and transportation model) to forecast growth associated with transportation improvements of a 12-lane river crossing and light rail to Clark College. The model showed only minimal changes in employment location and housing demand compared to the No-Build. For more information see FEIS Chapter 3, Section 3.4.

### O-034-008

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

<b>O-034-019</b>	<i>collapse" criteria, though the expense could be equal to a substantial portion of the cost of a new structure.</i>
	This is a gross exaggeration. In fact, the cost of priority level seismic retrofitting was determined to be \$100 – 200 Million, about the same as is now budgeted for demolition of the existing bridges.
<b>O-034-020</b>	<b>Insufficient Range of Alternatives</b>
	There is no least cost alternative that probably would have included tolling, seismic upgrade and high intensity transit, but no new freeway bridge.

Submitted by

Fred Nussbaum  
 AORTA Strategic Planner  
 Association of Oregon Rail and Transit Advocates  
 7/1/08

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-034-009**

The level of detail in the DEIS was intended to inform the public and other stakeholders with relevant information in order to understand the impacts and trade-offs associated with various alternatives. While some

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### Memorandum

To: **Heather Gundersen**  
 From: **Fred Nussbaum, Strategic Planner**  
 Date: **July 1, 2008**  
 Re: **AORTA Documents for Inclusion in Columbia River Crossing DEIS Comments**

**O-034-021** Attached electronically and on a compact disk to be mailed under separate cover is a folder containing the most significant correspondence between *AORTA* and the Columbia River Crossing Task force and its staff since 2005. This covers the period during which the Task Force was developing alternatives in preparation for the CRC Project DEIS and these communications should be part of the record, if not already included. They provide input on the development of CRC alternatives. The attachment and CD also contain a folder of documents prepared or contributed to by *AORTA* for SmarterBridge.org, a loose coalition of organizations and individuals concerned about the Columbia Crossing. Finally, the attachment and CD contain a third folder with documents supporting the arguments of both *AORTA* and SmarterBridge.org. A summary of most of these documents follows.

We request that all of the above documents be entered into the DEIS record.

The document name are keyed as thusly: yymmdd, followed by a letter within hyphens indicating the source; A = *AORTA*, C = CRC and S = SmarterBridge.

#### **A. AORTA Correspondence (AORTA Correspondence folder)**

Please note that some of the attached correspondence is not specifically identified as from *AORTA*, but came from *AORTA* director Jim Howell or Fred Nussbaum. Both Jim Howell and I have been designated by the *AORTA* Board to be our primary point persons on this project. All of the attached correspondence should be considered official correspondence from our organization, whether identified as from *AORTA* or not.

1. A 5/4/05 memo from Jim Howell to the CRC Task Force re: **Keeping I-5 on the Existing Columbia River Bridges** (4 pp.) including a transportation plan drawn on a B&W photo and a concept plan for redevelopment of the Vancouver waterfront. The proposal included a multimodal supplemental bridge for light rail, bikes/peds and local traffic adjacent to I-5 and a possible second local traffic crossing near the railroad bridge.  
 Filename: **050504-A-KeepingI-5onExistingBridges.pdf**
2. A 4/11/06 memo from Jim Howell to the CRC Task Force re: **AORTA's critique of the Columbia River Crossing Draft Components Step "A" Screening Report (March 22, 2006)** (4 pp.). Rebutals in detail the erroneous rejection of the Non-Freeway Multi-Modal Columbia River Crossing and Commuter Rail in that report.  
 Filename: **060411-A-RebuttaltoScreeningReport(R).pdf**
3. A 9/26/06 white paper from Jim Howell pointing out there are numerous seismically vulnerable structures on I-5 besides the Columbia bridges and that I-205 provides an alternate route. Also points out the railroad bridge is equally vulnerable and has no alternate route, while carrying much more freight tonnage. Finally, the local supplemental bridge, constructed to seismic standards, could provide a connection for priority traffic.  
 Filename: **060926-A-SystemicApproachToTheCrossing.pdf**
4. An 11/8/06 white paper entitled, **What a Comprehensive Columbia Crossing package built around a new Multi-modal Bridge would do**. (Not on *AORTA* letterhead, but showing Jim Howell as author, 5 pp., including colored transportation plan on B&W photo).  
 Filename: **061108-A-AORTAs11-8-06ProposedAlt.pdf**
5. A 11/23/06 white paper entitled, **What a Comprehensive Columbia Crossing package built around a new Multi-modal Bridge would do**, which is an update to the 11/8/06 proposal described in Item A.3 above. (Not on *AORTA* letterhead, but showing Jim Howell as author, 4 pp.) Includes the same

readers felt that the DEIS did not have enough detail, others felt that it was too long and detailed. For those who wanted more detail, the DEIS referred them to the technical reports that informed the analysis presented in the DEIS. These were made available on CD and on the project web site, as well as in hard copy. For those who felt that the DEIS was too detailed, an executive summary was distributed along with the DEIS and made available separately in hard copy and on the project web site. Public open houses and numerous public meetings were also held to provide opportunities for public discussion of the alternative development process. In addition to information available in the DEIS and technical reports, the CRC project made good faith efforts to provide additional information upon request. For example, the Development of the Range of Alternatives memo, and the information about how the range of alternatives were developed, was provided to the public in hard copy by request, and was available on the project's public web site to be viewed or downloaded. It was made available prior to the publication of the DEIS, and has been available since then. Also see response to comment O-034-018 below.

#### **O-034-010**

It would be inherently possible for alternatives that do not add capacity to I-5 to still meet the project Purpose and Need. However, modeling and analysis of such alternatives indicated that adding capacity in other corridors, adding travel demand measures, and adding high-capacity transit would not allow such alternatives to meet Purpose and Need without also making capacity improvements to I-5.

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

## O-034-021

plan as the one accompanying the 11/8/06 proposal in item A.4 above.

Filename: **061123-A-WhatAORTAAItts.pdf**

6. CRC responded on 11/27/06 with a memo to the Task force re: **Jim Howell Proposal** (1 pp.). Had as attachment Jim Howell's 11/23/06 revised proposal with the original (11/8/06) graphic described in item A.5 above.

Filename: **061127-C-CRCRespToAORTA11-8-06Alt.pdf**

7. An 11/29/06 memo from Jim Howell to the CRC Task Force re: **CRC Environmental Impact Study** (1 pp.), indicating that an alternative that retains the existing bridges needs to be studied in the Environmental Impact phase. It also summarizes AORTA's proposal (11/8/06, 11/23/06), described in items 4 above and 5 above.

Filename: **061129-A-MemoReCRCEIS.pdf**

8. A 1/2/07 memo from Jim Howell to the CRC re: **Response to Nov. 27 Memorandum from staff** (3 pp.), with attachments listed as follows (not included in electronic file):

a) 11-27-06 Memo to: Columbia River Crossing Task Force From: Doug Ficco and John Osborn (item A.6 above)

b) 11-29-06 Memo To: Columbia river Crossing Task Force From: Jim Howell. (Item A.7 above)

c) Multi-modal Bridge Option Site Plan. Jim Howell, 11-08-06, plan included with item A.4 above.

Filename: **070102-A-RespToCRC11-27-07Assess.pdf**

9. A 1/20/07 position paper entitled **AORTA's Position on The Columbia River Crossing Project** (2 pp.), unsigned and not on AORTA letterhead, that takes the CRC to task for only having a single big bridge alternative and reviews AORTA's analysis of the problem and proposed bundle of solutions.

Filename: **070120-A-AORTAsPositiononSingleBridgeAlt.pdf**

10. A 1/23/07 Memo from CRC Staff re: **Assessment of Jim Howell's Proposed Concept (Association of Oregon Rail and Transit Advocates)** (pp. 20 including attachments). Stars with 6 pages of staff comments on the AORTA's (11/8/06, 11/23/06) plan plus annotations by staff on a proposal plan redrawn on a larger, clearer base by Jim Howell at the request of the CRC. Includes as attachments:

a) 1/16/07 memo from Osborn and Ficco to the Task Force re: **Letter from AORTA** (1 pp.)

b) 1/2/07 memo from Jim Howell re: **Response to Nov. 27, 2006 Memorandum from staff**. discussed in item A.8 above.

c) 11/29/06 memo from Jim Howell re: **CRC Environmental Impact Study** described in item A.7 above. (1 pp.)

d) 11/27/06 memo from Ficco and Osborn re: **Jim Howell Proposal** described in item A.6 above. (1 pp.)

e) 11/23/06 update to the AORTA proposal described in item A.5 above. (5 pp.)

f) CRC Project Purpose and Need statement.

Filename: **070123-C-CRCAssessOfAORTA11-8-06Proposal.pdf**

11. A 2/5/07 memo from Jim Howell re: **Public transit in the CRC Corridor** (4 pp.) questioning whether the transit networks modeled provided adequate levels of service. Two attachments containing figures from the **Draft Components Step A Screening Report** are included in this electronic document.

Filename: **070205-A-070205-A-PublicTransitInTheCrcCorrid.pdf**

12. A 3/22/07 memo from Jim Howell to the 4th Alternative Subcommittee re: **Recommendation for a Fourth Alternative** promoting the AORTA alternative. Three attachments are referred to and are included in this electronic document:

a) **Critique of the CRC Staff Assessment of AORTA's Proposed Nov. 8, 2006 Concept for a Columbia River Crossing Emphasizing Public Transportation (keyed to Map)**, includes point by point responses to staff's 1/23/07 comments described in item A.10 above. The responses are numbered and keyed to staff's annotations on the AORTA plan. (1 pp.) Described in item A.13 below.

b) The staff annotated plan, with annotations now numbered by Jim Howell.(1.pp.)

c) AORTA proposed bridge cross-sections. (1 pp.)

Filename: **070322-A-FinalMemoTo4thAltSubcommitt.pdf**

13. A 3/22/07 document entitled **Critique of the CRC Staff Assessment of AORTA's Proposed Nov.**

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. 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 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. 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). This analysis found that a more balanced investment in highway and transit, as represented by Alternatives 2 and 3, performed best.

## O-034-011

Actually such alternatives were not faulted because they did not add capacity to I-5. They were faulted because they could not adequately address demand. Demand can be addressed through demand management as well as capacity. During screening, options for third corridors crossing the Columbia River in the Portland-Vancouver metropolitan region were evaluated, such as a new arterial crossing in the vicinity of the I-5 crossing or a river crossing west of I-5. None of the alternative corridors alleviated enough demand for the I-5 crossing to substantially improve safety, congestion, and mobility in the BIA.

## O-034-012



**O-034-021**

8. **2006 Concept for A Columbia River Crossing Emphasizing Public Transportation (keyed to Map)** (2 pp.) that is not on AORTA letterhead, but lists Jim Howell at the bottom. It was an attachment to the 3/22/97 memo described in item A. [REDACTED]. It does not specifically identify the document being critiqued, but the map is the one annotated by staff in its **Assessment** memo of 1/23/07 described in item 10 above. Jim Howell now added numbers to the map annotations to tie them in with the points in his one page critique outline.

Filename: *070322-A-AORTArespToCRCStaffAssessment(Map&Key).pdf*

14. A 5/13/08 outline by Fred Nussbaum on behalf of AORTA for its portion of the SmarterBridge.org presentation. This outline summarizes AORTA's position on the CRC components.

Filename: *080513-A-FredsTopicsSmarterBridgePPTSlideOutline.pdf*

15. A 5/29/08 white paper by Fred Nussbaum entitled **Five Questions Concerning the I-5 Mega-Bridge Proposal and Its Proponents**. It is a series of questions about the CRC process and our analysis.

Filename: *080529-A-Nussbaum-FiveQuestionsReCRC\_forOPB\_.pdf*

16. Testimony given by Fred Nussbaum on 6/24/08 on behalf of AORTA before the CRC Task Force regarding issues with the CRC DEIS process and requesting halting the selection of the LPA until a Supplemental DEIS is undertaken to answer significant questions raised, not only by citizen groups, but also major decision-making bodies and advisory groups like Metro, Planning Commission, Sustainable Development Commission, and the City of Portland.

Filename: *080624-A-FNTestimonyToCRCTaskForce6-24-08.pdf*

17. A log of key email communications between Fred Nussbaum and CRC staff, regarding requested technical information and the lack of timely response. The last entry is 6/26/08, mainly because I went out of town on the 27<sup>th</sup> and have only had intermittent access to the internet at our vacation home. Staff did send me on 6/30/08 origin-destination they had on hand, but by then it was too late for us to analyze completely.

Filename: *080628-A-FNemailCorrespondenceW-CRCLog.pdf*

**B. SmarterBridge.org Documents (DocumentsPreparedForSmarterBridgeTeam folder)**

Six documents

**C. Supporting Documents (Supporting Documents folder)**

Eight documents

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See response to comment O-034-005, O-034-008 and O-034-010 above.

**O-034-013**

Thank you for your comment. The option illustrated in Exhibit 2.3-7 of the DEIS was the most efficient for all traffic movements which is why additional options, although considered, were not included in the DEIS.

**O-034-014**

Serious and significant effort has gone into evaluating ideas generated by members of the public, including identifying and addressing strengths and weaknesses.

**O-034-015**

Comment noted. Increased traffic volumes can have a positive economic impact, when such motorists are also making banking, dining, and other stops. However, increased traffic is not always beneficial in a downtown area. For example, diverting through traffic off the interstate and onto downtown streets that are already congested would not be beneficial to the downtown.

**O-034-016**

See response to comment O-034-015 above.

**O-034-017**

As is made clear in FEIS Chapter 3 (Section 3.01) the toll significantly contributes to a rise in transit ridership and a slight diversion of auto traffic to I-205.

**O-034-018**

Option A+ did not meet the Purpose and Need for the project because it

didn't address many of the safety deficiencies on I-5 and also wouldn't address the congestion and mobility problems on I-5. The analysis was described in more detail in a memo to the Fourth Alternative Subcommittee, dated March 15, 2007, and was available on request prior to publication of the DEIS.

**O-034-019**

The DEIS included the best available cost estimates to seismically retrofit the existing bridges as part of the Supplemental Crossing alternatives. This information was made available to the public and decision-makers prior to selecting the locally preferred alternative.

**O-034-020**

CRC would reinvest in an existing and critical transportation corridor by improving the safety and efficiency of I-5 and by adding substantial improvements to mobility of transit riders, bicyclists, and pedestrians. Many different options for addressing the project's Purpose and Need were screened out prior to the development and evaluation of the alternatives in the DEIS. These options included low-cost approaches such as aggressive TDM/TSM programs or highway-only investments. Section 2.5 of the DEIS explained why these low-cost options were dropped from further consideration because they did not meet the project's Purpose and Need.

**O-034-021**

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.