03652



Lynn Peterson Chair

Bill Kennemer Commissioner

Martha Schrader Commissioner



BOARD OF COUNTY COMMISSIONERS

Public Services Building 2051 Kaen Road | Oregon City, OR 97045

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

June 30, 2008

Dear Columbia River Crossing Task Force,

L-022-001

Clackamas County appreciates the opportunity to provide public comment on the Columbia River Crossing Project. While we are not one of the sponsoring agencies, as an affected regional partner, we have been monitoring the EIS process for this complex project. The comments we offer below are intended to ensure that the eight partner agencies that will be making critical decisions regarding this project in the future will have information about how we believe the Columbia River Crossing Project could impact our county residents and businesses, and to highlight key issues that we urge you to thoroughly consider as this project moves forward.

L-022-002

First, we are keenly aware of the challenges in the I-5 transportation network, in both highway and transit aspects. As home to the Clackamas Industrial Area which contains some of the state's largest distribution companies, we also appreciate of the value of freight movement and our region's important economic role as an international trade hub. In addition, we also feel strongly that any new highway projects must reflect our region's policy commitment to reduced greenhouse gas emissions, travel demand management, and reduction of vehicle miles traveled.

L-022-003

We offer our support for the LPA recommended by the CRC Task force on June 24, 2008, a replacement bridge with three lanes northbound and southbound, with light rail. We understand that a new bridge is the best, though possibly most difficult solution to address the purpose and need of the project. This is the most critical hotspot in our regional highway system and a major investment must be made to bring it to an appropriate standard for the traffic it must serve.

L-022-004

Notwithstanding our support, we must urge that a larger view of the highway system should be more seriously considered in future stages of project development. Clear impacts on the I-205 are evident from your own limited analysis of travel demand and diversion; therefore it is critical that investments in this part of the system must be considered in parallel with the improvements to the Columbia River Crossing. As a whole, the system has a collective amount of capacity and it should be managed and distributed optimally. Further analysis must evaluate more broadly the impacts to the geographic area including I-205 further south than the current study area.

More specifically, we believe that tolls should be instituted on the I-205 Bridge concurrent with tolling on the new I-5 Bridge, in order to ensure that a funding source can be utilized to make needed investments throughout the regional north-south highway system. We can not afford to

P. 503.655.8581 | F. 503.742.5919 | www.clackamas.us

L-022-001

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

L-022-002

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

L-022-003

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.

03652

L-022-004

L-022-004

2 of 2

inhibit one integral part of the highway system while focusing on another, particularly if the improvements simply redistribute congestion problems from one area of the region to another.

Additionally, we believe that tolling as a traffic demand management tool is appropriate on both bridges. If tolls on an I-5 Bridge are expected to influence travel demand, it is appropriate to capture the similar demand that exists, and would be created by diversion, on the I-205 Bridge, a few miles away. Further, in seeking new funding tools for the I-5 Bridge, it would seem to make sense to maximize tolling as a funding source while also dedicating it toward making

corresponding, balanced improvements on the I-205 system for maximum system benefit.

Though this would certainly mean that Clackamas County businesses and residents would be impacted by these tolls, we would expect that they, along with the rest of the region, would also benefit from an integrated highway system that allows a more reliable flow of freight, manageable auto commuting patterns, and broader transit options. This could be a realistic option if the tolls collected on I-205 were used to benefit the users who would pay them. Together with the planned I-5 improvements, this would produce a far more reliable, multimodal, and manageable highway system in the region for decades to come, even with planned growth in both Oregon and Washington.

L-022-005

While Clackamas County is not considered a directly impacted jurisdiction in the Columbia River Crossing process, the decisions made regarding the CRC will certainly have direct and significant impacts on our businesses and our commuters. Additionally, we make many transportation investment decisions regionally, and decisions made regarding funding of this project have a direct impact on funding decisions made on any other project of regional significance. While it is clear that we support innovative funding models to help projects like the CRC progress, we also believe that regional equity is also critical to the future success of major transportation projects like this one. Acknowledgement that this project will create increased demand and congestion on other parts of the highway system is essential, and must lead to a finance plan that balances revenue generation, demand management, and regional equity.

L-022-006 L-022-007

We are committed to working with all of our partners to address our region's transportation challenges and maximize our opportunities. The Columbia River Crossing presents both challenges and opportunities, and we commend your efforts to work through the wide range of complex issues. The Clackamas County Board of Commissioners will continue to watch closely and provide our input regularly as progress on this important project continues.

Sincerely,

Dec Louxognos Bill Kennemer

Martha Schrader Commissioner

BCC/eg/kjb

Tolling I-205 is not part of this project, but could be implemented separately. With few exceptions, federal statutes do not permit tolling of an existing interstate highway without associated improvements. FHWA does have pilot programs that allow state departments of transportation to apply for approval to toll a facility.

L-022-005

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.

L-022-006

We agree that there will be other projects needed to keep the transportation system functioning adequately. However, the purpose and

need for the CRC is clear and focuses on the I-5 river crossing. Additionally, we have been asked to reduce the costs both of the project and project planning. Therefore, resources cannot be dedicated (as part of this project) to addressing other bottlenecks, safety deficiencies, etc. The CRC project is one part of a holistic approach to the region's transit and highway systems.

L-022-007

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