

From: [J. Cortright](#)
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CC:
Subject: Supplemental Comments on CRC DEIS
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Attachments: [commuting_flows.pdf](#)



P-0765-001 Please accept the following as supplemental comments on the CRC DEIS.

The DEIS is deficient for failing to consider the possibility that changes in land use development patterns could greatly reduce the amount to travel between Clark County and the Oregon portion of the metropolitan area. Clark County has a dysfunctional relationship with the rest of the metropolitan area, with a much higher proportion of the region's resident population and workers and a much lower proportion of the region's jobs. Very modest changes in this relationship over the next decade or two could dramatically reduce the amount of commuting in the I-5 corridor. This is particularly important to the justification for the CRC because virtually all of the identified congestion is associated with peak hour, peak direction movements of commuters originating in Clark County and travelling to and from jobs in Oregon.

If the jobs/population balance in Clark County were to be brought more closely in line with that of Clackamas County (the Oregon County with the highest current jobs/housing imbalance) the effect would be to reduce about 36,000 trips per day on the I-5 and I-205 bridges. This calculation is based on data from the Census Bureau's Local Employment Household Dynamics (LEHD) data, shown on the attached spreadsheet.

Clark County has 123,898 workers and 86,135 jobs
 Clackamas County has 131,330 workers and 106,593 jobs

If Clark County had even the same ratio as Clackamas County, it would have at least 20,000 more jobs locally.

About 90% of the jobs in Clark County are held by people who live in the county.

If there were 20,000 more jobs locally, it would be reasonable to expect 18,000 of them to be held by local residents.

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The DEIS did not fail to consider the possibility that land use changes could change travel patterns.

Nor is the construction of the CRC project intended to be a substitute for creating jobs in Clark County. In fact the analysis assumes substantial growth in Vancouver and Clark County employment. Further, the induced effects of CRC, due to freight, reliability and transit access are expected to further stimulate economic activity and job growth in Clark County as well as in North Portland. 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 and the Portland area. Vancouver, Clark County, the Columbia River Economic Development Council, and other organizations work together to increase the jobs to population ratio in Clark County. Even so, substantial job growth on either side of the river would be highly unlikely to cause any substantial reductions in cross river traffic. Should cross-river traffic grow at a slower rate than projected, that does not eliminate the benefits of the project, but it would have the added advantage of extending the operational benefits of the proposed improvements. Further, the CRC project is being completed in order to achieve many goals including safety improvements, bike and pedestrian improvements, and bringing light rail into Vancouver.

P-0765-001 | That would be 18,000 fewer commuters (36,000 fewer trips) across the I-5 and I-205 bridges each day.

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