

P-0771-001

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

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P-0771-001 CRC Draft Environmental Impact Statement Comments...
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July 1, 2008

CRC Draft Environmental Impact Statement (DEIS)

Comments

P-0771-002

The CRC "build" option is a monumental undertaking, the largest in this region's history. Much of the \$4 billion cost of this project will be gathered as a fuel tax, tolls or some debt instrument and, as I understand it, at the expense of other important regional transportation needs. In fact I am told that the funding of the "build" option will take precedence over other needed transportation spending in the region. Reduced options do not sound a wise planning choice to me.

Furthermore, in my opinion, these costs are based on some very doubtful and extremely speculative projections in light of today's global and economic uncertainties. For example the current oil supply crisis, the mortgage crisis, unemployment, inflation and huge national and personal debts, all of which have recently ballooned, suggest to me that expected revenues for construction and operation will be far lower than anticipated. These factors will have a far greater negative impact than are presented in the CRC DEIS. Therefore I recommend that the economic factors used in the DEIS be reviewed and updated to reflect present realities and trends, and that a concrete proposal be made that will describe exactly how the project will be funded.

P-0771-003

As I understand it the "build" proposal will only serve to "induce" more vehicular travel, travel that is presently congested mainly due to residents of Clark County. As stated in the Oregonian (May 18, 2008) "Clark County commuters are the primary cause of the congestion and the primary beneficiaries of the project." These residents have opted out for a suburban life style dependent on the automobile and they probably will continue to do so. Without land use and transportation planning options in place in the Vancouver area it will only be a matter of time before congestion will happen again.

P-0771-004

This suggest to me that even if rail service is extended to Vancouver it will not be a first choice option for Vancouverites. In other words it would not produce expected revenues or ridership. This real possibility is not mentioned in the DEIS and should be included in the final statement. Therefore I recommend that an analysis be made which describes the loss of revenue from high capacity mode due to commuter choice, especially over the first ten years of operation.

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The Columbia River Crossing project includes the replacement of the existing I-5 bridge over the Columbia River, improvements at seven interchanges over 5 miles of I-5, and the extension of light rail from Portland to Vancouver. The projected cost to construct this large and complex project are presented in Chapter 4 of the FEIS, and are estimated in year of expenditure dollars to account for inflation. Multiple sources will help fund construction of the project – the federal government, State of Oregon, State of Washington, and tolling the I-5 Bridge.

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As described in Chapter 3 (Section 3.4) of the DEIS and FEIS, and in the Indirect Effects Technical Report, highway capacity improvements and access improvements can induce development in suburban and rural areas that were not previously served, or were greatly underserved, by highway access. The DEIS outlines a comprehensive analysis of the potential induced growth effects that could be expected from the CRC project. A review of national research on induced growth indicates that there are six factors that tend to be associated with highway projects that induce sprawl. These are discussed in the Indirect Effects Technical Report. Based on the CRC project team's comparison of those national research findings to CRC's travel demand modeling, Metro's 2001 land use / transportation modeling, and a review of Clark County, City of Vancouver, City of Portland and Metro land use planning and growth management regulations, the DEIS and the FEIS conclude that the likelihood of substantial induced sprawl from the CRC project is very low. In fact, the CRC project, because of its location in an already urbanized area, the inclusion of new tolls that manage demand, the inclusion of new light rail, and the active regulation of growth management in the region, the CRC project will likely reinforce the region's goals of concentrating development in regional centers, reinforcing existing corridors, and promoting transit and pedestrian

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The DEIS suggests that the Portland and Vancouver downtown areas will benefit from a high capacity transit connection between the two. This may be true, but there is no mention about the negative effect of the “enhanced” vehicular traffic flow into the Rose City Quarter. What happens when this high speed vehicular traffic is funneled into the narrow four lane constriction through the Rose City Quarter? It is already a bottleneck and the “enhanced” traffic flow will only worsen the problem. Will the Oregon taxpayer be expected to add more lanes to resolve the problem? Has the City of Portland been denied the option of removing I-5 entirely at some point in the future? This is valuable land and if properly zoned for shops, offices, condominiums, restaurants and hotels it would be a prime revenue producing area for the city. I do not think that this is an option the city would consider feasible. Therefore I recommend that this subsequent lost revenue for the City be included in the environmental study along with the potential cost of improving travel velocities through the Rose Quarter district due to “enhanced” vehicular traffic from the “build” option.

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friendly development and development patterns.

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).

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. Even with a 12-lane river crossing, the model showed only minimal changes in employment location and housing demand compared to the No-Build Alternative.

For a more detailed discussion regarding potential indirect land use changes as a result of the CRC project, including the likely land use changes associated with the introduction of light rail, please see Chapter 3 (Section 3.4) of the FEIS.

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Light rail has been endorsed by every local Sponsoring Agency (Vancouver City Council, C-TRAN, RTC, Portland City Council, TriMet, and Metro), whose boards are comprised of the elected leadership of the region.

Annual light rail passenger trips crossing the I-5 bridge in 2030 are projected to be 6.1 million, with daily ridership around 18,700. The travel

time for the morning commute by light rail between downtown Vancouver and Pioneer Square in downtown Portland will be approximately 34 minutes. Light rail would travel on a dedicated right-of-way, with more reliable travel times than auto drivers dealing with unpredictable road conditions, traffic congestion, and parking challenges.

The CRC project planning for light rail incorporates and supports the principles of the Vancouver's City Center Vision Plan. Downtown Vancouver has seen recent growth in higher density mixed use projects from three to 12 stories in height. In addition, another 4,000 downtown condominiums are proposed or pending as part of new developments. The core of Vancouver has, along with many of the larger corridors such as Fourth Plain Blvd, medium to high density residential development and an urban mix of uses. Transit demand in these areas is quite high, and ridership will increase with the introduction of light rail.

Long-term operation and maintenance of the new light rail line will be funded through C-TRAN and TriMet. For its share of the operations and maintenance funding, C-TRAN plans on having a public vote.

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The Oregon Department of Transportation (ODOT) completed Phase I construction of the I-5 Delta Park widening project in fall 2010. Phase I of the project involved widening I-5 and lengthening the entrance and exit ramps at Victory Boulevard and Columbia Boulevard. Phase II involves improving local streets and will begin when funding is secured. Phase I of the Delta Park project widened the current 2-lane segment of southbound I-5 to 3 lanes. There are currently no immediate plans to widen I-5 south of Delta Park. Neither the CRC project nor the Delta Park projects are intended to address the southbound traffic congestion that currently exists near the I-5/I-405 split. However, traffic analyses show the congestion at the split will not be worsened because of the Columbia River Crossing project. The main reason is that fewer cars are

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

Beyond the CRC and Delta Park projects, the I-5 Transportation and Trade Partnership Final Strategic Plan recommended a comprehensive list of modal actions relating to: additional transit capacity and service; additional rail capacity; land use and land use accord; transportation demand/system management; environmental justice; additional elements and strategies (such as new river crossings); and financing. RTC and Metro are tasked with initiating recommendations as part of their regional transportation planning role. Examples of current efforts include RTC's evaluation of future high-capacity transit in Clark County, and evaluation of needs for future river crossings. Regional planners have investigated solutions to existing bottlenecks at the I-5 connections with I-405 and I-84. ODOT is responsible for conducting ongoing studies to identify other congestion problems on I-5 in Oregon that may need to be addressed in the future.