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**P-0792-001**

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

P-0792-001 Please include the attached.

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P-0792-002

Draft Testimony to the Planning Commission (4-28-08)

The primary purpose of this Columbia River Crossing project as proposed by WDOT and ODOT is to expand a five mile long section of the I-5 freeway to accommodate a huge projected traffic demand that will greatly increase oil dependence, greenhouse gas pollution and urban sprawl.

P-0792-003

It is not just a new 8 to 12 lane bridge across the Columbia River. It also includes additional freeway lanes and rebuilding six interchanges to accommodate a projected 40% increase in traffic demand over the next 30 years while ignoring recent laws passed in Oregon and Washington requiring vehicle miles travel per capita to be reduced by 35% during the same time period.

P-0792-004

During the duration of the CRC Study, several low-cost non-freeway solutions to the river crossing problems were presented and rejected, primarily because they could not accommodate the projected traffic growth on the freeway.

Now the CRC staff is claiming that traffic demand can be greatly reduced to meet the requirements of the new laws by providing light rail, bike facilities and tolls on the new bridge.

P-0792-005

Does it then not seem prudent to re-examine these rejected low-cost non-freeway solutions in light of these new laws? Do they address the other objectives of the project such as safety, freight, ramp congestion, local access, and lifts and seismic strength of the existing bridges?

If they do, why would anyone approve the expenditure of \$4 billion on this massive freeway project?

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P-0792-002

The project purpose is to improve Interstate 5 corridor mobility by addressing present and future travel demand and mobility needs in the Columbia River crossing Bridge Influence Area (BIA). The BIA extends from approximately Columbia Boulevard in the south to SR 500 in the north. Relative to the No-build alternative, the proposed action is intended to achieve the following objectives: a) improve travel safety and traffic operations on the Interstate 5 crossing's bridges and associated interchanges; b) improve connectivity, reliability, travel times and operations of public transportation modal alternatives in the BIA; c) improve highway freight mobility and address interstate travel and commerce needs in the BIA; and d) improve the Interstate 5 river crossing's structural integrity. See Chapter 1 of the DEIS for more discussion on the development of the project Purpose and Need. The Purpose and Need is based on extensive analysis of the existing transportation problems in the I-5 CRC corridor, and reflects extensive feedback from the public and stakeholder groups. The Purpose and Need focuses largely on metrics that do not inherently require substantial, or exclusive, increases in highway capacity. On-going analysis has demonstrated that the Purpose and Need is best met by a multimodal alternative that improves highway, transit, and bicycle and pedestrian facilities, and adds tolling to the highway river crossing.

See discussion of energy, climate change, and induced development below.

P-0792-003

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

Testimony by Jim Howell before the Metro Council June 5, 2008
On the Columbia River Crossing Draft Environmental Impact Statement

- P-0792-006** | If you are required to make a choice among the five alternatives, the only responsible choice is the "No Build".
- The foundation of this massive freeway project is the alleged need to accommodate projected future traffic demand. This foundation is crumbling as we speak.
- Staff's projections of a 70% increase in motor freight demand and a 40% increase in commuter demand by 2030 is totally unrealistic, given the government's commitment to reduce greenhouse emissions and the escalating cost of oil. It is quite possible that in 2030 the freeway will have fewer vehicles than today.
- P-0792-007** | Voting "No Build" does not mean that nothing should be done. There are many ways to accommodate future demand without throwing in excess of four billion dollars at a project to rebuild five miles of freeway and seven interchanges, to construct a 12 lane megastructure over the Columbia River and Hayden Island, and to spend over \$150 million to demolish three structurally sound bridges.
- Expanding public transportation service on both sides of the river is a no-brainer, as is extending the MAX Yellow line to Vancouver. Providing non-freeway local vehicle access and first class bike and pedestrian connections to Hayden Island from both sides of the river is also a no-brainer.
- P-0792-008** | Over the past three years, proposals have been made for simple low cost modifications to some of the freeway ramps. These proposals would have freed up the outer lanes on the existing bridges to function as through lanes, but were rejected by staff because they would not accommodate their inflated demand projections. These options should be reevaluated in light of reduced demand.
- P-0792-009** | An I-5 Rail Capacity Study, completed In 2003 as part of the Portland / Vancouver I-5 Transportation and Trade Partnership, recommended about a dozen rail projects, estimated to cost about \$300 million, that would be required to relieve severe freight congestion in this corridor. The study states "Train delay ratios in this corridor already approach levels experienced in much larger, denser corridors such as those within the Chicago area". Unfortunately the study did not seriously address commuter rail options.
- Unfortunately, proposals for rail improvements were put on the back burner. About three years ago the multi-modal Trade Partnership was taken over, some would say "hijacked", by the Washington and Oregon DOTs. They ignored the "elephant in the room", the Burlington Northern / Santa Fe Railroad, and turned what was a multi-modal effort into a huge freeway project.

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.

P-0792-004

It is true that bridge demand can be reduced with congestion pricing, light rail transit, etc. Even with such reductions, the Interstate facility will carry tens of thousands of cars daily, far more than can be easily accommodated with a new "non-freeway" connection.

P-0792-005

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.

P-0792-009

The rail bridge, built in 1908, serves the only rail corridor on the west coast between Mexico and Canada. It is a more critical link than I-5 in the event of a major earthquake. Another freeway bridge (I-205) is just five miles east, but the next rail crossing is a single track bridge 90 miles upriver east of The Dalles.

Incidentally, if the rail bridge were upgraded to withstand a major earthquake and the ancient swing span replaced with a lift span better aligned with the "hump" in the freeway bridge, most highway bridge openings would be eliminated. The 2003 Rail Capacity Study recommends that planners "Explore means to facilitate the operation of the BNSF Columbia River Bridge by seeking funding for the replacement of the existing swing span with a lift span located closer to the center of the river channel".

As the cost of diesel fuel continues to rise, more freight will move from trucks to rail. Trains are far more energy-efficient than trucks and can be powered on electricity as well as diesel.

Unfortunately, in the course of studying freight rail capacity issues, no one thought to ask the BNSF Railroad what additional track improvements would be needed and what would be their cost to accommodate commuter rail service between Portland and Vancouver.

For example, two four-car commuter trains shuttling between Vancouver Station and Union Station during peak hours could carry over 2,400 commuters an hour, in seated comfort, the equivalent capacity of another freeway lane filled with sovs. The trip would be less than 15 minutes long, more reliable, more energy efficient and less costly to operate than express buses on the freeway.

In conclusion, a cost-benefit analysis of a mix of light rail to Vancouver, improved bus service, local access to Hayden Island, ramp modifications, and heavy rail improvements for freight and passengers should be conducted before this massive and expensive freeway expansion project is given the green light.

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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.

P-0792-006

Significant increases in oil prices can have both short term and long term effects on travel behavior. In the short term, the options for responding to rising gas prices are more limited, and include driving less and/or changing from driving to walking, biking or transit for at least some trips. During recent increases in gasoline prices transit use increased and off-peak highway travel decreased. Peak period highway travel changed little.

Over the long term, there are more options for adjusting to changes in gasoline prices, besides changing driving behavior. Technological advances and legislative mandates can increase fuel efficiency standards in the long term. In turn, as older vehicles wear out, more consumers can replace them with more fuel efficient vehicles. Automobile manufacturers are developing and will continue to develop new vehicle and engine technologies that require much less, or even no, petroleum-based fuels. This trend is already happening as evidenced by the growing popularity of gasoline-electric hybrid and small electric vehicles.

P-0792-007

Please see response to comment P-0792-005.

Testimony on the CRC DEIS by Jim Howell 5-29-08

- P-0792-010** | If one were required to make a choice among the five alternatives, the only responsible choice would be the "No Build".
- P-0792-011** | This does not mean that nothing should be done. Clearly, there is severe congestion on the freeway, especially southbound in the AM and northbound in the PM. The current proposal to build more lanes will not solve the problem because, in the long, it will only attract more traffic.
- P-0792-012** | There are many ways to relieve this bottleneck without throwing over \$4 billion dollars to rebuild five mile of freeway and 7 interchanges, construct a 12 lane mega structure over the Columbia River and Hayden Island and spend over \$150 million to demolish three structurally sound bridges.
- This project grew out of an earlier study by many jurisdictions called the Portland / Vancouver I-5 Transportation and Trade Partnership that recommended an inclusive multi-modal approach to solving the transportation problems in the corridor.
- About three years ago this process was taken over, some would say "hijacked", by the Washington and Oregon DOTs and turned into a huge freeway project with a condescending nod toward transit, bikes and pedestrians.
- It seems that everyone has failed to acknowledge the "elephant in the room" located about one mile downstream. It is the BNSF Railroad. The rail bridge, built in 1908, serves the only rail corridor on the west coast between Mexico and Canada and is a more critical link in case of natural disaster than I-5. Another freeway bridge (I-205) is just 5 miles east but the next rail crossing is a single track bridge 90 miles up river east of The Dalles.
- As the cost of diesel fuel continues to rise, more freight will move from trucks to rail. The 70% increase in truck traffic projected by CRC staff and used to justify this freeway project will not materialize. Trains are far more energy efficient than trucks and can be powered on electricity as well as diesel.
- Capacity for freight and passengers on the railroads will have to be greatly increased to meet future demand and government will have to help pay for it.
- An I-5 Rail Capacity Study was completed In 2003 that indicated that "Train delay ratios in this corridor already approach levels experienced in much larger, denser corridors such as those within the Chicago area". The study recommended 10 projects costing about \$170 million that should be done immediately that would greatly relieve some of this congestion. Very little has been done to date.

P-0792-008

Many of the ramps have been reevaluated. Designs have been modified on Hayden Island and at Marine Drive specifically.

P-0792-009

Eliminating bridge lifts would provide a substantial safety improvement and reduce operating and maintenance costs, but it is not a stated purpose of the CRC project. Relocating the BNSF railroad bridge swing span would reduce the number of times the I-5 bridge would need to lift, but it would not eliminate the need for bridge lifts. The 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, proposals that rely significantly on moving the BNSF swing span would also not address key substandard features of the existing I-5 facility as described in Chapter 1 (Section 1.3) of the DEIS.

The evaluation of the five alternatives in the DEIS was preceded by an 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. After identifying this wide array of options, the project evaluated whether and how they met the project's Purpose and Need, and 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

P-0792-012

It also identified other improvements such as adding another main line across the river, replacing the antiquated swing span with a lift span, grade separating the North Portland junction and other improvements that would greatly facilitate freight and passenger service.

Incidentally, replacing the swing span with a lift span better aligned with the "hump" in the freeway bridge would eliminate most highway bridge openings.

The total cost of all of these rail improvements would be pocket change compared to the cost of the CRC project but could greatly relieve much of the freight and commuter traffic on the freeway.

Amtrak currently travels between Union Station and the Vancouver Station in 15 minutes, half the time it would take MAX, or buses on the freeway. Imagine what a couple of shuttle trains fed by C-Tran buses could do to relieve peak hour traffic on I-5.

Another low cost improvement would be a new bridge across the Portland Harbor to Hayden Island for local traffic, MAX, bikes and pedestrians. This would allow access to and from Hayden Island without getting on the freeway and would reduce congestion at the Denver Avenue and Harbor Drive interchanges.

The bike/ped. lane on the existing Harbor Bridge could be converted to another traffic lane allowing north-bound trucks to bypass general traffic queuing at the meter to get on the freeway.

If Vancouver would agree to a multi-modal bridge for local traffic, light rail, bikes, pedestrians and a southbound auxiliary lane for SR14 traffic, both on-ramps feeding traffic onto the existing bridges could be eliminated. This would allow these bridges to accommodate six actual through lanes of traffic like the rest of the freeway.

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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. Also, travel demand modeling and traffic analysis demonstrated that alternatives with substantially more transit service and only minor highway capacity improvements, had only marginal differences in transit ridership and auto demand, but had substantially greater congestion, emissions, and highway safety problems. As documented in the Panel Assessment of Interstate Bridges Seismic Vulnerabilities Technical Report (2006), it was determined necessary for any CRC project alternatives that reused the existing I-5 bridges to also seismically retrofit those bridges. The DEIS analyzed a Supplemental River Crossing as a component of two out of the five alternatives studied.

A Supplemental River Crossing, which would retain and seismically retrofit the existing bridges for northbound traffic and add one new bridge to the west for southbound traffic, was not chosen as a part of the locally preferred alternative by the local sponsor agencies. This decision was informed by the DEIS, which found, among other things, that the Supplemental River Crossing would not substantially improve congestion over No-Build, would maintain some substandard and unsafe design features, would not improve, and may actually worsen marine navigation, and would not be substantially cheaper to construct than a replacement river crossing, as originally believed.

Though the Supplemental River Crossing would improve the seismic safety of the existing bridges, these findings indicate that it did not meet the project's Purpose and Need as effectively as the Replacement River Crossing.

P-0792-010

Thank you for your comment. Preferences for specific alternatives or options, as expressed in comments received before and after the

DRAFT for 7-9-08 Hearing

**June – 2008 Testimony to the Portland City Council by Jim Howell
On the Columbia River Crossing DEIS**

P-0792-013

I urge you to ask for a Supplemental DEIS on the Columbia River Crossing. Over the next 30 years, travel and shipping preferences will change because of escalating gas and diesel costs as a result of growing worldwide demand. This major shift in preference was not anticipated when the Purpose and Need for this project was written.

Commuters will shift from private cars to public transit, shippers will shift from trucks to rail and intercity travelers will shift from airplanes to trains. This nation's transportation system will begin to resemble the systems in the highly industrialized nations of Europe and Asia where oil consumption per capita is about one-half of what it is in the United States largely due to their superior rail and transit infrastructure.

Demand will require priorities to change in how to we spend public funds on our transportation infrastructure. Rail and transit will move to the top of the list. Roads will lose their dominant position at the public funding table that they have enjoyed for the past half-century.

As oil costs continue to rise, improved infrastructure for trains and public transit will become more critical in the Columbia Crossing influence area than I-5. The economical vitality of this region is at stake if the rail system cannot meet future shipping demand or if this vital north-south rail corridor is severed due to the loss of the Columbia River Bridge due to an earthquake or other natural or man caused disaster.

P-0792-014

Although the original mandate for this project was to analyze all transportation modes, WDOT and ODOT focused primarily on the interstate freeway and ignored the railroad.

The railroads, while privately owned, will require massive amounts of public funding to expand their rail and bridge infrastructure to accommodate future freight and passenger demand. The notion that this is the responsibility of the private sector, not the public sector, is no longer valid.

The Washington and Oregon Departments of Transportation, as their name implies, are responsible for all modes of transportation, not just state and federal highways. In the past they have functioned primarily as highway departments with little funding, or interest, in other modes. This will have to change if both states are going to meet their greenhouse gas and VMT reduction goals.

issuance of the DEIS, were shared with local sponsor agencies to inform decision making.

P-0792-011

Following the selection of the LPA in July of 2008, the CRC Project Sponsors Council (PSC) was developed to provide recommendations to the project on a variety of issues, including the number of add/drop lanes over the river crossing. Over the course of several months, PSC was provided with operational characteristics and potential environmental impacts of 8-, 10-, and 12-lane options. These technical evaluation criteria included, but were not limited to, traffic safety, congestion, traffic diversion onto local streets and I-205, regional vehicle miles travelled, transit ridership, regional economic impact, effects to neighborhoods, and protected species and habitats. In addition to the technical information, PSC received input from CRC advisory groups and reviewed public comment submitted to the project and obtained during two public Q&A sessions in January 2009 regarding the number of lanes decision, as well as hearings conducted by Portland City Council and by Metro Council. In August 2010, the PSC voted unanimously to recommend that the replacement bridges be constructed with 10 lanes and full shoulders. For more information regarding the number of lanes decision making process, see Chapter 2 (Section 2.7) of the FEIS.

The proposed new lanes are add/drop lanes (i.e., lanes that connect two or more interchanges), which are used to alleviate safety issues associated with the closely spaced interchanges in the project area, and accommodate the 68 to 75% of traffic that enters and/or exits I-5 within two miles of the Columbia River.

P-0792-012

Please see response to comment P-0792-009.

P-0792-014

An ideal place to start is this Columbia River Crossing project. If over four billion tax dollars are going to be spent, they should be spent in the most effective way possible. Unfortunately, in this project WDOT and ODOT failed to consider what rail improvements could do to reduce commuter and freight demand on the highway system. This should be required before any Locally Preferred Alternative is approved.

An I-5 Rail Capacity Study, completed In 2003 as part of the Portland / Vancouver I-5 Transportation and Trade Partnership, recommended about a dozen rail projects, estimated to cost about \$300 million, that would be required to relieve severe freight congestion in this corridor. The study states "Train delay ratios in this corridor already approach levels experienced in much larger, denser corridors such as those within the Chicago area".

Unfortunately, in the course of studying freight rail capacity issues, no one thought to ask the BNSF Railroad what additional track improvements would be needed and what would be their cost to accommodate commuter rail service between Portland and Vancouver.

For example, two four-car commuter trains shuttling between Vancouver Station and Union Station during peak hours could carry over 2,400 commuters an hour, in seated comfort, the equivalent capacity of another freeway lane filled with sovs. The trip would be less than 15 minutes long, more reliable, more energy efficient and less costly to operate than express buses on the freeway.

If least cost planning is to play a significant roll in restoring this nation's infrastructure, voting for a \$4.2 billion freeway expansion project is astep in the wrong direction.

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P-0792-013

Significant increases in oil prices can have both short term and long term effects on travel behavior. In the short term, the options for responding to rising gas prices are more limited, and include driving less and/or changing from driving to walking, biking or transit for at least some trips. During recent increases in gasoline prices transit use increased and off-peak highway travel decreased. Peak period highway travel changed little.

Over the long term, there are more options for adjusting to changes in gasoline prices, besides changing driving behavior. Technological advances and legislative mandates can increase fuel efficiency standards in the long term. In turn, as older vehicles wear out, more consumers can replace them with more fuel efficient vehicles. Automobile manufacturers are developing and will continue to develop new vehicle and engine technologies that require much less, or even no, petroleum-based fuels. This trend is already happening as evidenced by the growing popularity of gasoline-electric hybrid and small electric vehicles.

P-0792-014

See discussion of the CRC project's Purpose and Need above. Also, 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. Additionally, 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 cost-effectively 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 from 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.