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Columbia River Crossing

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Columbia River Crossing
Attn: Heather Gundersen
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RE: Draft EIS Comments

P-0803-001

The Columbia River Crossing Project's I-5 Draft EIS offers no clear structured way or detailed plan to pay for the project it is proposing.

The CRC proposed I-5 crossing project has been estimated between $3.4 and 4.0 billion dollars. Despite this estimate, the DEIS has not established any firm structure of exactly where the money will be coming from to build this project, nor does it even offer any clear line item breakdown for the general public of how the overall project costs were derived.

The report lists numerous transportation related funding sources that are currently providing funds to the States of Washington and Oregon, WADOT, ODOT, C-Tran, and TriMet, but mentions nothing of any committed funds from any of these sources to the CRC project. The lone exceptions are an amount of $15 Million from the Interstate Maintenance Discretionary Fund that was committed to the CRC in 2007 and $20 Million from the Transportation Partnership Account Fund from WADOT in 2009.

That is a long way from the $3.4 - $4.0 Billion needed for this project.

Federal Funding
The Draft EIS speaks of $750 million dollars available from the Federal New Starts Program, and only vaguely references "a national competition" for these funds. What does a "national competition" mean? What are the rules? Who is in competition for this money and how many other projects are competing for these same funds? Is it an "all or nothing" competition, or are there partial awards? The report does not discuss in detail any criteria that this project must meet, (although it mentions criteria are required) or any "magic number" that this project must score in order to qualify for any of these funds.

If this project were to be awarded the $750 million from the New Starts program and, as is speculated another $876 million could be raised in tolls, that amount totals only $1.6 Billion. Where would the additional $1.8 - $2.4 Billion come from to cover the balance due on the bridge?

State Funding
If the State of Washington is expected to pay the estimated $1.8 - $2.4 billion difference, then how will the State afford this amount, the amount projected for the SR520 bridge project ($4.38 Billion) and the amount for the Alaskan Way Viaduct project ($2.4 – $4.0 Billion)?

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In 2006, WSDOT and ODOT agreed to a goal of equally contributing to the costs of the environmental process needed to reach a Record of Decision. This goal was agreed to in recognition that this project would contribute to the economic and freight mobility needs of both states and would include transit, highway and bridge improvements in both states. Though it is WSDOT and ODOT's shared goal to keep the project as close to equally funded as possible, it is understood that at any moment in time the total funds provided by WSDOT and ODOT may not be equal, owing primarily to the fact that each state's legislature operates on its own schedule and federal earmarks dedicated to this project are of unequal amounts and have been earmarked at different times. The Columbia River Crossing project includes the replacement of the existing I-5 bridge over the Columbia River, improvements at seven interchanges over five miles of I-5, and the extension of light rail from Portland to Vancouver. The projected cost to construct this large and complex project is presented in Chapter 4 of the FEIS, and it is estimated in year of expenditure dollars to account for inflation. The estimated cost to construct this project could be covered by a variety of sources. State, federal, and local funds collected through tolling are expected to provide approximately equal thirds of the construction costs for the project.

Since 2002, WSDOT has been developing a process of determining cost and schedule estimates, the Cost Estimate Validation Process® (CEVP®), to help deliver major projects. Compared to conventional cost estimating, CEVP® is a risk-based estimating process, iterative in nature, and represents a "snapshot in time" for that project under the conditions known at that time. CEVP® is the expression of project cost and schedule as a range rather than as a single number. Providing cost information as a range accounts for risk factors that might otherwise cause costs to balloon over time. The cost information is given for the year of expenditure and includes everything, even "unknown" issues that may arise. CEVP® is a construction cost estimate tool and does not

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At a cost of $4.38 billion, Washington State officials estimate that it will take **40** years to pay off the SR520 bridge project. That project already has secured $500 million from gas tax revenues (2005), and $1.1 billion from a Regional Transportation Investment District. Even with this funding, the SR520 project is still $2.7 Billion short of the required funds and it is already past the DEIS phase.

If the CRC I-5 project adopts the same plan as the SR520 plan, is a 40 year payoff plan something that local users of the crossing are willing to settle for? Where is a vote of the public on this issue?

How can the State of Washington afford three major highway projects totaling between $10.18 and $12.38 Billion?

Another important question that is not completely addressed in the DEIS is what portion of the project is paid for by Washington and what portion is paid for by Oregon? This has not been made clear either in the DEIS or in any public meeting and is a disservice to taxpayers in both states. How can we be asked to fund anything when we do not have any cost breakdowns as to what the exact costs are or who the responsible parties are that will pay for them?

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Tolling and Taxes
Tolling has been discussed as another way to help pay for this project. Where are the specifics? Will tolls be levied on both of the existing bridges (I-5 and I-205) in advance of the project build? What will the rates be and for how long? The SR520 floating bridge project in Seattle is rumored to be charging up to $10 round trip across the bridge. Will this be the case on the I-5 Crossing project?

Since tolls would tax most heavily those workers from Clark County who are driving to or returning from jobs in Oregon, why are those people required to pay Oregon State Income tax? Nowhere does the DEIS address this inequity? Why? Are those who are affected most by an out of state income tax expected to pay an additional tax (toll) each day just to get to work?

The Draft EIS also speculates that an additional $876 million could be raised through tolling. Where are the specifics of this plan? The DEIS also states that only the I-5 bridge can be tolled for this project. How will the plan handle the mass migration of commuters to the I-205 bridge to avoid an expensive I-5 toll? The public would like to know where the detailed plans are for the rates and duration in years of the proposed toll on this corridor.

Furthermore, tolling revenue can vary widely. With the rise in fuel prices over the past year, coupled with the weak US Dollar, more people are leaving their vehicles at home and are taking mass transit. While this can be viewed as positive by some, how does this affect the proposed tolls? Fewer vehicles on the road are what this project is about, right? Fewer vehicles mean less congestion, which means faster transit times, right? However,

estimate long-term operations and maintenance costs. WSDOT now mandates all projects over $25 million use the process. Chapter 4 of the DEIS, and the Cost Risk Assessment included as an appendix to the DEIS, include information about how costs were estimated for the DEIS. See Chapter 4 of the FEIS for more discussion on how project costs were estimated in the CEVP® that was conducted following publication of the DEIS.

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Tolling was evaluated in the DEIS, and included in the LPA for two important reasons. First, a toll is necessary to pay for the construction of this project, as discussed in Chapter 4 of the FEIS. This section also provides considerable new information about the tolling system. A 2009 study of numerous tolling scenarios (available from the CRC web page) provides additional information. Second, a toll provides a valuable travel demand management tool that encourages travelers to take alternative modes (including light rail provided by this project), travel at off-peak periods, or reduce their auto trips. This demand management reduces congestion and extends the effective service of the facility.

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fewer vehicles crossing a tolled roadway mean less money to fund the project. Where will the project get the additional money needed when fewer vehicles are on the road each day? Where in the DEIS has this variable been taken into consideration?

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Taxpayers
The US economy is currently in a recession. Since the "dot-com bust" at the end of the "soaring 90's" many of the manufacturing jobs that have come to be known as "family wage jobs" have been "outsourced" or sent out of this country. With them have gone a strong tax base from which infrastructure can be built. With little domestic manufacturing left in this country, there is very little tax base from which to draw upon for infrastructure improvement. No family wage jobs, no taxes, no revenue from taxpayers to pay for any bridge construction or operational maintenance.

Local Funding
The city of Vancouver may be able to squeeze out an additional $20.00 per person on car tabs, but this will hardly put a dent in the approximately $2 Billion needed to "bridge the gap" in funding for this project. Assuming other funds are available (New Starts, Tolling), there will still be a considerable gap between what money is in hand and what money must be obtained. Given the recent difficulty that the City of Vancouver has had in balancing their own fiscal budget during this decade in an effort to simply provide basic Fire, Police and Rescue services, where do they propose to get additional monies to fund the construction of the bridge or the operations of any proposed transit? (*The Columbian "City of Vancouver might increase taxes to avert cuts in police, fire"* Monday, May 12, 2008)

Recent comments at the C-Tran board meeting on June 10 by Commissioner Steve Stuart echoed strong advice from the "highest ranking state officials" about this project.

Commissioner Stuart had come from a State level meeting earlier in the day and re-iterated what was said to him during that meeting. "It is important for this project to be designed around what funding it currently has and what it can realistically get as opposed to designing a project that is ideal and then trying to figure out how to get the funds to build it."

Cost Overruns
Nothing in the DEIS discusses any cost overruns. Why not? Who will pay for them?

Summary
Overall, the financial structure of the DEIS offered by the CRC on the I-5 crossing project is vague, sketchy and without details.

No clear and itemized finance plan has been discussed in the DEIS. Asking citizens and taxpayers to spend $4 Billion requires a detailed analysis and plan of accounting. The sum total that is being quoted contains too many ambiguities about the overall plan.

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Please refer to response to comment P-0803-001.

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The plan as outlined also relies too heavily on the estimated $750 million from the New Starts program. It also assumes that the State of Washington will contribute significant funding to this project when it clearly does not have the money to do so. As was stated in a recent article from ***The Columbian*** (6/19/08 " Official: Bridge funding options are scarce"), "Washington's top transportation official says the state will rely heavily on tolling to replace the I-5 bridge and might court private partners to provide an infusion of early cash". Additionally, "Paula Hammond, Washington State Transportation Secretary told ***The Columbian's*** editorial board not to expect a huge commitment of federal highway dollars for the Columbia River Crossing Project."

If State and Federal funding is limited, how much of the burden will fall on local taxpayers? Where is this discussed in the DEIS?

The public has not been given any specifics about this program as it relates to their financial responsibility to pay for this project. How can taxpayers be asked to pay for a project when we do not know the true cost of it?

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