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Columbia River Crossing

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

4617 NE 25th Court
Vancouver WA 98663
June 29, 2008

Dear Sirs and Madams,

P-0812-001 **I am against building a new I-5 road bridge over the Columbia River**. Listed below are a few of the many reasons.

P-0812-002 1. We can not build ourselves out of traffic congestion.
P-0812-003 2. It will increase the amount of greenhouse gasses.
P-0812-004 3. Faulty criteria was used in the decision making process. Many current and future factors were ignored including new development, the cost of fuel and the increased amount of pollution.
P-0812-005 4. Poor livability near and around the new structure.
P-0812-006 5. Freight should move on the railroads, not on the roads. If more freight capacity is needed, build more railroads. They are the most efficient and safest way to move freight.

P-0812-007 What should be done is; improve the flow of the roads on either side of the existing bridge and bring the existing bridge up to seismic standards. If a new bridge is built it must be only for light rail, bicycles and foot traffic.

P-0812-008 The plan for a new 4 billion dollar bridge is a 21st century version of the Washington Public Power Supply System 'WPPSS' debacle. If a new interstate bridge is approved, as it would be a national project, it must be completely paid for with federal funds, not tolls and local taxes.

Sincerely,
Marie K Darrig
Marie K. Darrig

P-0812-001

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

P-0812-002

By 2030, the region's population is expected to increase by one million people. This increase will result in more people needing to travel between home, work, school, recreation, etc. In 2005, 135,000 vehicles crossed the Columbia River on the Interstate Bridge, which led to 4-6 hours of congestion each weekday. By 2030, 184,000 are predicted to cross the river, which would lead to 15 hours of daily congestion if no action is taken.

Congestion occurs when vehicle demand is greater than a transportation system's capacity. It results in slower speeds and increased travel times. CRC defines congestion as vehicles traveling less than 30 mph. The Columbia River Crossing project uses information gathered from Metro's nationally-recognized travel demand models to determine the project's effect on congestion. These models predict trip frequency, types or modes of transportation, destination, and time of day. Transportation planners use these models to analyze the effects of such factors as increased population and employment, transportation improvements, and new developments on the transportation system.

Based on the Metro model's past ability to predict transportation effects, the CRC project is confident in the data received from Metro and uses it to determine what impact the project will have on congestion. The improvements proposed by the project to the highway and seven interchanges will help better accommodate increased future vehicle traffic. New auxiliary lanes and longer on/off ramps will allow safer and more efficient merging and weaving to enter or exit the freeway. Narrow lanes and shoulders will be widened to current standards. Shoulders will

be added where they are currently missing. All of these changes will improve the flow of traffic in the bottleneck area of the Interstate Bridge.

P-0812-003

The FEIS analysis (Section 3.19.10) indicates that the LPA would reduce GHG emissions compared to the No-build alternative.

P-0812-004

These factors were analyzed in the DEIS. As described in Chapter 3, Section 3.4 of the DEIS and in Appendix A: Indirect Effects: Induced Growth of the CRC Land Use Technical Report (2008), 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 Chapter 3 (Section 3.4) of the FEIS. 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 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 summarizes in the "Columbia River Crossing Travel Demand Model Review Report" (November 25, 2008). Metro's running of the MetroScope model in 2010 confirmed these results.

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.

Regarding energy prices and traffic forecasts, analysis reported in the DEIS and used to inform decisions on a locally preferred alternative were derived from adopted regional employment and population forecasts and state-of-the-art modeling and evaluation conducted by Metro, RTC and the project team, and reviewed by all project sponsor agencies as well as FTA and FHWA.

Regarding pollution, the air quality evaluation presented in the DEIS assessed how the project would affect emissions of pollutants regulated by state and federal standards. Oregon and Washington, as well as the federal government, have ambient air quality standards. These standards are based on human health, and provide thresholds that indicate when concentration of a pollutant could pose a health risk. This evaluation included an analysis to demonstrate this project would allow the region to retain conformity with state and federal air quality standards for Carbon Monoxide (CO). The CO analysis analyzed potential CO

impacts at intersections where traffic volumes would be affected by the project. See the Air Quality Technical Report for a detailed explanation of the state and federal regulations concerning air quality and the evaluation of whether this project could affect compliance with these regulations. See Section 3.10 of the DEIS for an explanation the pollutants regulated by state and federal law.

The evaluation in the DEIS found "that future (no-build or build) emissions of all pollutants would be substantially lower than existing emissions for the region and the subareas" (page 3-277). These reductions in emissions are largely the result of on-going reductions in vehicle emissions that will occur with or without the project, and are based on relatively standard assumptions regarding future vehicles and fuel. The anticipated vehicle emission reductions are based largely on regulated improvements in fleet fuel efficiency standards, and regulated improvements related to cleaner gasoline and diesel fuels. Any extraordinary improvements in fuel efficiency or fuels would result in even greater emission reductions.

Projected reductions in vehicle fleet emissions would result in a 25% to 90% reduction in criteria pollutants over existing conditions, even with the anticipated growth in population, employment and VMT. In addition, the build alternatives would generally provide further reductions in vehicle emissions at the regional level and for some of the subareas along I-5. Emissions would be slightly higher with the project than with No-Build in some subareas, as discussed in the DEIS Chapter 3 (Section 3.10) and the FEIS Chapter 3 (Section 3.10).

P-0812-005

As Chapter 3 (Sections 3.10 and 3.11) of the DEIS described, and as Chapter 3 (Sections 3.10 and 3.11) of the FEIS further elaborated, noise and air emission levels will improve for communities and most households along I-5. Air quality will be improved in large part by

measures unassociated with the CRC project, such as regulated improvements in vehicle fuel emissions and in cleaner gasoline and diesel. Highway noise mitigation proposed for the CRC project would result in fewer noise impacts in the future with the project than there are today. There will be some locations where noise impacts cannot be mitigated. It is also true that with the introduction of light rail, better bicycle facilities, and a toll, the Average Daily Trips over the bridge will be reduced from the levels expected under the No-Build Alternative. The livability of residents along I-5 will also be improved as a result of greater personal mobility, an improved transit network, an improved network for walking and biking, less traffic cutting through neighborhoods, and the subsequent job creation that is expected to occur as a result of this major investment.

P-0812-006

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 form 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.

Additionally, 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.

P-0812-007

The evaluation of the five alternatives in the DEIS was preceded by an extensive 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. These options were evaluated for whether and how they met the project's Purpose and Need, and the findings were reviewed by project sponsors, the public, agencies, and other stakeholders. Alternatives that included only TDM/TSM strategies, or provided only transit improvements, would provide benefits, but could only address a very limited portion of the project’s purpose and need. This extensive analysis 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 did not adequately address the seismic vulnerability of the 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. The DEIS evaluated alternatives with more demand management (higher toll) and increased transit service with less investment in highway infrastructure improvements (Alternatives 4 and 5) compared to the toll and transit service levels included in Alternatives 2 and 3. The additional service and higher toll provided only marginal reductions in I-5 vehicle

volumes, and they came primarily at the cost of greater traffic diversion to I-205. This analysis found that a more balanced investment in highway and transit, as represented by Alternatives 2 and 3, performed considerably better on a broad set of criteria.

P-0812-008

The Columbia River Crossing project is not simply a bridge project. The CRC 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 construction 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. Please refer to Chapter 4 of the FEIS for a description of the current plans for funding construction and operation of the LPA. This discussion provides an updated assessment of likely funding sources for this project, though it is not common practice to receive funding commitments prior to the completion of the alternative selection process. As described in the FEIS, project funding is expected to come from a variety of local, state, and federal sources, with federal funding and tolls providing substantial revenue for the construction. Regarding tolling specifically, it was evaluated in the DEIS, and included in the LPA for two important reasons. First, a toll may be necessary to pay for the construction of this project, as discussed in Chapter 4 of the FEIS. 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.