

Columbia River Crossing
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Vancouver WA 98663
June 29, 2008



Good People,

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Columbia River Crossing

P-0813-001 | I do not believe a new I-5 road bridge over the Columbia River is needed. Listed below are a few of the many reasons.

P-0813-002 | 1. We can not build ourselves out of traffic congestion.

2. It will just create more growth

P-0813-003 | 3. It will increase the amount of greenhouse gasses.

P-0813-004 | 4. 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-0813-005 | 5. Poor livability near the new structure.

P-0813-006 | 6. 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-0813-007 | 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-0813-008 | 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.

Thank you for your consideration

Sincerely,

Michael Darrig

P-0813-001

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

P-0813-002

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 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.

P-0813-003

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

P-0813-004

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

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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-0813-005

The CRC project team anticipates a high level of livability near the new bridge structure and within the entire project area for the following reasons:

1. Light rail improves livability by increasing residents' access to transit.
2. Overall, the project will help to decrease noise levels for those living in downtown Vancouver.
3. Residents in downtown Vancouver will benefit from new economic vitality spurred by transit oriented development in the area.
4. The project will reduce traffic congestion on local arterials in downtown Vancouver.

P-0813-006

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 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.

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-0813-007

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-0813-008

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 is presented in Chapter 4 of the FEIS, and it is 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.