

Response to Columbia River Crossing's Final Environmental Impact Statement documents

10/20/11 to Heather Willis and the CRC Design team

As a Vancouver-Portland commuter for more than twelve years, I am offering my observations to challenge some of your assumptions regarding future traffic and light-rail along the I-5 corridor. I also have a couple recommendations to better utilize public funds and scale down the project in light of the current economic state, and help you create a product that will be most useful to area residents.

P-036-001

1. In section 2.6.2 the report stated: "light-rail is quicker ... than rapid transit." The Portland's EXPO center yellow line is slower now than the C-Tran's express bus by about ten minutes. Also in the Vancouver area, the proposed light-rail path will not go near where most people live, so they would have to either drive or take the bus to connect to it. The time to transfer and wait would be five to ten minutes, depending on coordination between the transit modes.
2. When the EXPO center light-rail was built, only a small percentage of express bus commuters switched to that, even though riding it was cheaper. What makes you think that most people would prefer this method even if you did cut five minutes out of the total commute time by extending the rail to Vancouver? It would still be slower than the express bus.
3. One faulty assumption in the design is the length of rush-hour for transit. It is not the same as the congestion of cars on I-5. The car and freight traffic will stagger to try to avoid most congested times, whereas daily transit commuters would not vary their work hours to try to avoid congestion. I believe that the past is a predictor of the future, and according to my observation, the rush-hour times in Portland have not changed from three hours twice/day over the last twelve years. Neither has C-Tran extended their express bus schedule, in fact, it was shortened by 45 minutes each way the past few years. Thus I would expect the transit peak hours to remain six hours per day total indefinitely.

P-036-002

4. The CRC is counting on rerouting about ten percent of the crossing traffic to light-rail. To allow 6,000 commuters to fit into the trains over the three-hour peak period would mean 250 people per train (trains eight times an hour). The trains have to be short due to short blocks in downtown Portland, and the average current train style seats 100 people to a train. If people have to stand most of the time, they will quit taking the train and go back to driving. Also it is not possible to increase train frequency, since so many other trains will converge onto the same bridge and streets in Portland. Off-peak hours, the train may be used for recreational, doctor and shopping trips to avoid paying the toll. Even then to keep it running every fifteen minutes may be too much.

P-036-003

5. The report also stated that light-rail overall is cheaper than rapid transit. It would hold true if there was not the need for both. The cost of light-rail for 2,000 to 3,000 possible commuters would not be very cost-effective. If 70% of commuters prefer to get there faster -by bus- than cheaper -by train-, it would make more sense to invest money into the rapid transit to ensure busses can better keep their schedules. Also this rapid transit lane could be used by long-distance freight. It would be very beneficial to the businesses to get the freight through faster regardless the time of day.

P-036-001

It should be noted that even with the light rail extension, many C-TRAN express routes are expected to continue service between Clark County and Portland. Information on which bus routes would be truncated in Vancouver can be found in Section 2.2.2 of the FEIS.

As congestion increases on the corridor, bus routes that share general purpose traffic lanes would face increased travel time. Because light rail transit has its own guideway, it will offer more consistent travel and will not be subject to traffic congestion in the corridor. Modeling indicates that light rail would offer a time savings compared to buses in the design year of 2030.

Freight traffic will try to avoid the most congested periods. However, it is predicted that overall traffic volumes will continue to rise. The increase in traffic volume on I-5 means that more people are using the corridor than the capacity of the highway can serve. This excess traffic volume must be accommodated either by extending the peak traffic hours (and associated congestion), or by transferring to other routes or modes.

P-036-002

It is hoped that, much like in Portland during peak periods, the light rail system will be heavily utilized in Vancouver. A train with 250 passengers is well utilized, but still has remaining capacity. Considerable attention has been paid to the capacity of the trains, stations, and park and rides. There are industry standards that have been applied. There has also been considerable outreach to the public in order to understand what conditions would be most desired.

System modifications will enable more trains to travel through Portland to accommodate the expanded system. The improvements to the Steel Bridge, which are described in the FEIS, are an example of such improvements. The project will modify system components on the Steel

P-036-004

6. To have three parking lots or structures for light-rail commuters in Vancouver seems excessive. If the expected peak ridership drops from 6,000 to 2,400, perhaps 1,000 people would need parking throughout the day. What makes you think that the commuters from Vancouver would give up their cars and ride the train to work? Congestion is not so bad that they would do that. Maybe 20% of the current drivers to downtown would do that to avoid paying the toll, but only if they are assured parking availability downtown, or if taking the connector bus is convenient.

7. Also I did not find anywhere in the report how you keep other people, like college students, from parking in the Vancouver park-ride facilities. Will you charge for parking to keep them out? The cost of parking should be less than double the toll to keep the incentive to hop on the train. Would \$3 per day charge for parking be enough deterrent to keep non-train riders out? The average parking charge anywhere downtown is \$5 or more per day. Also could the revenue from parking be offset against what is being charged for tolls?

P-036-005

8. Most commuters do not have downtown as their destination. To transfer to the connecting trains would take too long for most people to be convenient way to get to work. It appears the extensive TRI-MET light-rail network won't be used much by light-rail riders from Vancouver, unless their destination is the Lloyd Center area.

P-036-006

9. It seems the traffic model used to predict future congestion is overly aggressive and does not match the past rates. The northbound HOV lane has stayed at 3 hours since they opened it. The congestion thus has remained at about six hours per day for the past ten years or so, and would not increase to 15 hours in twenty years. Please adjust your model to scale down the project to better represent the future need.

P-036-007

10. The CRC project should be phased according to need and availability of funds. The bridge and its on- and off-ramps are the most important, given the earthquake-risk and need for lifting of the current bridge. Then the bottlenecks southbound at downtown Portland exits and I-84 interchange need fixed to prevent backups north. The northbound I-5 needs smoother transitions from the Fremont Bridge and the Delta park/Marine Drive entrances. Then the other interchanges may be phased in as money becomes available.

P-036-008

In conclusion, I would highlight the need to scale down your traffic model of congestion, the light-rail usage predictions and the need for parking in downtown Vancouver. I would also like to see you create a separate lane for express-bus/freight combination for improved travel times for majority of users. Also phasing the project according to need and availability of funds makes sense. I would appreciate if my insight and suggestions would be taken to heart and considered in the planning and final design of this project.

Sincerely,

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Bridge to enable slightly higher speeds, which will improve the network functionality and allow for more trains from Vancouver.

P-036-003

As illustrated in the FEIS, and summarized in the Executive Summary, light rail would better serve transit riders than bus rapid transit (BRT) within the CRC project area because it:

- Would carry more passengers across the river during the PM peak
- Result in more people choosing to take transit
- Have faster travel times through the project area
- Result in fewer potential noise impacts
- Would have lower costs per incremental rider than BRT

Additionally, light rail is more likely to attract desirable development on Hayden Island and in downtown Vancouver, which is consistent with local land use plans.

Allowing freight to use the exclusive bus rapid transit lane would add additional traffic to that lane further increasing the bus rapid transit travel time.

P-036-004

Both current and future land use is one of the criteria used to determine the locations of proposed transit facilities and park and rides. Other considerations include traffic impacts, property impacts, and overall transit operations. The five proposed stations will support current and planned residential and commercial development and related services. As an example, the Clark College terminus station will serve a community and senior center, a community college, and the Veterans Administration campus.

These specific stations and park and rides, with their proposed parking capacities, are tested as part of the rigorous analysis completed to satisfy the requirements of the Federal Transit Administration. The FTA and the local agencies have decades of experience in estimating ridership and facility demand. Their projections are validated through years of such studies, and calibrating the projection methods and models with data from completed projects.

P-036-005

There are many transit trips that would not be directly served by the proposed light rail transit extension. However, the transit ridership forecasts indicate that there is a very large demand for this service and that a significant number of passengers would ride the proposed light rail extension. The transit ridership forecasts are based on extensive information about the projected origins and destinations of commuters and other travelers, as well as information on the transportation system and performance. The actual ridership projections and discussion are in Section 3.1 of the FEIS.

P-036-006

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-036-007

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. The interrelationships of the interchanges requires a comprehensive solution in the corridor. However, the project is actively working to identify meaningful and efficient construction phasing to better adapt to the unique revenue challenges of recent years.

P-036-008

Thank you for your comments. Please refer to the responses above.