

**Hines, Maurice**

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**From:** Maye Thompson/Doug Allen [mayedoug@spiritone.com]  
**Sent:** Sunday, October 23, 2011 1:00 PM  
**To:** Columbia River Crossing  
**Subject:** Columbia River Crossing FEIS Comments  
**Attachments:** feiscomments.doc

SUBJECT: Columbia River Crossing FEIS Comments

(comments also attached as an MS-Word document)

**P-037-001**

I provided extensive comments on the CRC Draft EIS. Although those comments have been noted in the FEIS, they have not been dealt with in an adequate fashion. Essentially all of the flaws in the DEIS that I pointed out remain in the FEIS.

At the heart of the problem is the same flawed "No Build" option that is the basis for the "Purpose and Need" and that is used to justify the Locally Preferred Alternative. This flawed No Build option comes from straight-line projections of traffic growth, projections that have no scientific basis in rational statistical analysis or the behavioral sciences.

The traffic and congestion predictions in the No Build option were buttressed by population, employment, and trip-making projections flowing from the politically determined zoning in Clark County, not from any valid economic science regarding future growth.

The LPA was predetermined, not based on a valid DEIS process. Those outside the process can not, of course, know whether the flawed No Build option is the source of this predetermination, or whether it was ginned up to support a predetermined outcome, but the result is the same. The fact that then Regional Administrator David Cox described the predetermined outcome well in advance of the DEIS, was noted in my DEIS comments, but not adequately addressed. The FEIS seems to simply pound on the table and assert that the facts are so strongly in favor of the LPA that any appearance of early bias is simply acceptance of those putative facts.

The one major change in the FEIS, use of the "MOVES" model, does nothing to improve the original flaws. The original flaw was to analyze the behavior of vehicles, regarding their energy use and emissions of pollution under presumed operating scenarios, rather than analyzing the driving behavior of human beings in the long term. This flaw was not corrected.

As a result, the DEIS, and now the FEIS, have come to preposterous conclusions regarding traffic, congestion, energy-use, toxic pollution, and emission of greenhouse gases. People are not so stupid that they will continue to attempt to drive routes that become increasingly congested. The "four step" traffic modeling that was used in the CRC EIS process is notorious for ignoring the intelligence of people in the long run.

The "four step" approach is also notorious for ignoring the potential for increased transit ridership when starting from a base case, such as we have in Clark County and the "bridge influence area" of substandard existing transit service.

The entire EIS process was an exercise in deliberately ignoring or downplaying the potential for using tolling, transit, and low-cost options, by holding up the flawed No Build traffic projections. Staff adamantly claimed that low-cost options would not meet the "purpose and need." The FEIS is simply further table-pounding to reinforce this unsupported claim.

Actual traffic volumes, in the period subsequent to the CRC EIS analysis, prove that the CRC process was fatally flawed, and should be declared void. I would not suggest remanding this process to those who have spent much more than \$100 million in such a flawed manner. Any further analysis of highway and/or transit across the Columbia River between Portland and Vancouver must be done under closer scrutiny

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Some updates were made to the traffic modeling after the DEIS, as described in Section 3.1 of the FEIS, although none of the changes to either the modeling or the No-Build were as significant as Mr. Allen has recommended. Please see the responses to letter P-047 regarding your comments on traffic, population and employment projections, the travel demand modeling, low cost options, tolling, transit, fluctuations in actual traffic volumes, and the environmental impacts based on the traffic forecasts.

**P-037-001**

by those who are paying for this analysis, by people capable of studying all reasonable alternatives, and people capable of doing "least cost" planning, given the increasing scarcity of funds for infrastructure expansion.

Douglas R. Allen

734 SE 47<sup>th</sup> Ave.

Portland, OR

97215

October 23, 2011

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