Hines, Maurice

From: Ron Buel [ronb@donavoncards.com]
Sent: Monday, October 24, 2011 2:52 PM
To: Columbia River Crossing
Cc: Joe Cortright; mara@clfuture.org; 'Jeff Manning'
Subject: Completely inadequate FEIS for CRC

Dear CRC:

P-045-001

As testimony on the CRC DEIS, Joe Cortright and I submitted a long paper about land-use in Clark County - the 5,000 acres of un-developed farmland in Clark County that is currently zoned for housing. The FEIS, like the DEIS, says there will be 30 years of static land-use - no growth in Clark County. This implies that a new freeway bridge would not make any difference to the rate of development in Clark County in the future. This is not a believable assumption. A new freeway bridge will bring new development, and therefore increased travel across the Columbia on I-5, within the 30 year period covered by the FEIS. Clark County and Vancouver planners assume population growth rates through 2030 - such population increases will be stimulated by perceptions that a new bridge will make travel easier and less congested, and you have not accounted for such growth in automobile travel across the Columbia caused by a new bridge. Nor do your air pollution figures, nor your carbon dioxide projections account for such induced travel.

It is also unrealistic to assume that light rail transit will carry 37% of trips in 2030 or 2035. This is far too high, since people will still have to get in their cars to drive to the park-and-ride garages near the light rail stations, and the trip on the Yellow Line has nine stops between Hayden Island and Portland's central city. Time savings on light rail will not be that great, compared to the automobile, especially if you are adding more freeway capacity. These light rail ridership figures are simply not realistic. Therefore, you have further under-estimated the travel on light rail.

Further, Stantec told Oregon State Treasurer Ted Wheeler that the Metro travel models used by the CRC are not capable of predicting what percentage of trips will use the I-205 Glenn Jackson Bridge instead of paying a toll to use the CRC. Therefore your projectios of what the un-tolled Glenn Jackson usage will be, when compared to toll rates on the CRC that are not yet final, has not been accurately assessed by your FEIS. Nor can you accurately assume what impact such route-changing will have on congestion on I-205, and the resulting impacts on air pollution and carbon from such switching of routes by commuters are similarly rendered inaccurate by this problem.

Your FEIS does not attempt to assess impacts on parallel arterials to I-5, nor on travel on arterials to and from entrances (and exits) on I-5. This is particularly troublesome because this means that you have not accurately assessed net effects on air pollution and greenhouse gas emissions in the nearby neighborhoods from CRC travel. Your work has only assessed the impacts on I-5 within the bridge impact area, leaving you making predictions of air pollution and carbon that cannot, therefore, be accurate on a net basis.

You have not accurately assessed the congestion impacts at Victory Blvd. or Delta Park, when the seven lanes going South coming off Hayden Island and Marine Drive South narrow to three lanes at Victory Blvd. This junction is

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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 will likely support the region's goals of concentrating development in regional centers, reinforcing existing corridors, and promoting transit and pedestrian friendly development and development patterns. The region's goals are reinforced by the project's 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.

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 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

P-045-001 going to be at 99% of capacity, stopping traffic and backing it up onto the bridge during every morning commute. As a result, projected improvements in peak Southbound congestion will not materialize from construction of the CRC. This also has air pollution, air toxic and greenhouse gas ramifications - they will be much worse than you projected for the CRC.

You have built a strawman of a No-build which vastly over-states the congestion that will occur in the traffic modeling years of 2030 and 2035 if there are no changes to the existing I-5 bridges. Traffic has been declining on the I-5 bridges over the last decade, especially in response to the increase in gasoline prices which, across the nation, is causing people to drive less. You make your CRC projections look better when compared to this unrealistic No-build strawman. You under-state the congestion that will occur with the CRC (and on the Glenn Jackson Bridge) while vastly over-stating traffic and congestion (and air pollution and carbon) from the No-build outcome.

P-045-002 I do not see in the FEIS projections of impact of construction (nor length of the in-water work window) on endangered salmon runs in the Columbia. The newest bridge design will also have more pillars near the shore, which will also have negative impacts after construction to the salmon run that have not been calculated in the FEIS. Net, net, you have not realistically projected the impact on salmon runs from construction and a completed bridge.

P-045-003 I do not see in the FEIS the impacts fairly assessed on the more than 20 historic sites near the project.

P-045-004 I do not see numbers on losses of jobs from the closing of 39 businesses (approximately 600 jobs) on Hayden Island and 50 businesses in Vancouver.

P-045-005 I do not see assessments of the economic impacts of disruption on businesses not taken by the CRC, from the seven years of construction of the CRC project.

Cordially,

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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. 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.

Traffic volumes fluctuate and did decrease during some years. Traffic

volumes obtained from the Oregon Department of Transportation's automatic traffic recorder (ATR) monitoring sites show that traffic volumes have, in fact, been increasing in the last few years. Whether the traffic volumes forecast for year 2030 will actually be achieved in that year should not be the only consideration. In its July 27, 2010, report, the Independent Review Panel expressed concerns about a longer horizon. The IRP commented "The desirability of living in the Portland/Vancouver region is not going to diminish, so populations will continue to grow…. [T]he IRP believes the greatest risk in the decision-making process is not over-sizing the bridges but not building enough capacity for the next 100 years."

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.

The air quality evaluation presented in the DEIS assessed how emissions would be expected to change by 2030 and how the project would affect emissions of pollutants regulated by state and federal standards as well as vehicle emissions that are not regulated. Oregon and Washington, as well as the federal government, have established ambient air quality standards for criteria pollutants. These standards are based on human health risks. The DEIS evaluation included an analysis demonstrating that the CRC project would allow the region to retain conformity with state and federal air quality standards for relevant criteria pollutants. See the Air Quality Technical Report for a detailed

explanation of the state and federal regulations concerning air quality and the evaluation of how the project complies with relevant air quality regulations. See Section 3.10 of the FEIS for an updated explanation of the pollutants regulated by state and federal law.

The DEIS also evaluated how the project alternatives would affect emissions of mobile source air toxins (MSATs) from I-5 traffic. MSAT emissions from vehicles are not currently regulated. 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 standard assumptions regarding future vehicles and fuel. The anticipated vehicle emission reductions are based largely on regulation-driven improvements in fleet fuel efficiency standards and cleaner gasoline and diesel fuels. Any extraordinary improvements in fleet 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 I-5 related criteria pollutant emissions over existing conditions, even with the anticipated growth in population, employment and VMT. In addition, the build alternatives would provide small further reductions in vehicle emissions at the regional level and for most pollutants in each of the subareas along I-5. CO and NOx emissions would be slightly higher with the project than with No-Build (but still lower than existing conditions) in the I-5 subarea between the SR 14 and SR 500 interchanges, as discussed in DEIS Chapter 3 (Section 3.10) and FEIS Chapter 3 (Section 3.10). The updated analysis conducted for the FEIS resulted in very similar findings to those in the DEIS.

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Page 3-393 in Section 3.16 of the FEIS document provides discussion on the in-water timing of any necessary dredging and cofferdam

placement (November 1 through February 28) and in-water impact pile driving (September 15 through April 15). This page also summarizes the likely impacts to ESA-listed salmonids and eulachon from impact pile driving which was identified as the largest impact to aquatic systems of the project. Total shading from project construction is discussed on page 3-394. Exhibit 3.16-9 provides a summary of project elements' effects on ESA-listed species. Other activities are proposed to occur year-round as discussed in the Ecosystems Technical Report. Exhibit 5-1 in the Ecosystems Technical Report presents a proposed sequencing of in-water structure construction.

The LPA will not have an increased number of piers or pillars near the shore compared to that addressed in the DEIS or during ESA consultation. Removal of the existing bridge after construction of a new bridge will result in an increase in shallow water in the Columbia River and a loss in North Portland Harbor. Quantification of shallow water impacts are discussed on pages 3-390 and 3-391 of the FEIS.

Much more detailed analysis on short-term and long-term effects on listed and other native aquatic organisms is provided in Sections 4 and 5 of the Ecosystems Technical Report. Analyses in the technical report address near-shore and shallow-water effects from temporary structures and shallow-water structures, cofferdams, piers and shafts, shading, etc.

P-045-003

Section 3.8 of the FEIS provides details about each impact. The Archaeology and Historic Built Environment Technical Reports also provide additional information.

P-045-004

Section 3.4 of the FEIS and the Economics Technical Report describe the impacts to local jobs associated with displacements.

P-045-005

The impact of construction activities on businesses is considered in the FEIS. Please see discussions in Section 3.4 (Land Use and Economic Activity), specifically the subsections on Temporary Effects and Mitigation.