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**O-004-001**

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

June 24, 2008

To Whom It May Concern:

O-004-001

The Oregon AFSCME Environmental Caucus respectfully submits the attached statement for the consideration of the Columbia River Task Force. With this statement, we would like to introduce into your deliberations areas which we feel should be adequately addressed as the Task Force moves forward with the CRC project.

The Oregon AFSCME Council 75 Executive Committee voted to support this statement at its meeting on June 21, 2008.

Thank you for your thoughtful consideration. If you have any questions please refer them to Steve Hughes, 503-239-9858 ext. 123, or steve@oregonafscme.com

Sincerely yours,

The Oregon AFSCME Environmental Caucus

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JUN 25 2008

Columbia River Crossing

Statement of the Oregon AFSCME Environmental Caucus on the Columbia River Crossing

June 21, 2008

O-004-002 We, the members of the Oregon AFSCME Environmental Caucus, work at various public agencies, ranging from Metro, to DEQ, to Multnomah County, and OHSU. We are public employees serving our communities in the planning, environmental, and healthcare fields. As such, we have a professional stake in the decisions being made about the Columbia River Crossing. We are committed to a healthy environment and a high quality of life in our region. As union members and environmentalists, we see common interest between those who are fighting for clean air, sensible planning and combating climate change, and those who are fighting for living wage jobs in our region. Additionally, as members of the organized labor movement, we believe that the issues of working people and social equity must be upheld as the debate over the CRC unfolds. Last, we are concerned that the debate about the CRC could devolve into a "jobs vs. the environment" argument. We feel this false choice is relic of a bygone era.

Therefore, if the Columbia River Crossing bridge project becomes a reality, we would like to see the following areas adequately addressed:

O-004-003 Financial risks should be minimized from this publicly-funded project.

We believe in the efficient use of public money. As public employees, it is in our best interest to ensure that public revenue is spent wisely and that major investments in infrastructure should demonstrate a rate of return that justifies the expenditure. Our region will be responsible for a significant piece of the CRC's projected \$4.2 billion price tag. A recent economic analysis¹ noted that the CRC would be the most expensive public works project in the region's history, financing plans are speculative, federal support likely to be small, would require an unprecedented level of debt, and that we face a multi-billion dollar transportation investment deficit already. Moving forward on a plan without a solid funding plan is irresponsible and will negatively impact our ability to fund other public priorities in the future.

O-004-004 Transportation and economic needs should be balanced with planning and other community needs.

We realize that transportation impacts our economy and how our communities develop. We are also sympathetic to the importance of creating family wage jobs in the construction of the CRC. However, we're concerned that a larger, multi-lane bridge will make our jobs as public planners more difficult. We fear that this project will come to be seen as a monument to the pitfalls of disconnecting land use planning from transportation planning. Our transportation problems will only be solved if we consistently apply sustainable planning principles to all projects, big and small.

O-004-005 Public health impacts need to be minimized.

As stewards of public health, we are concerned about the impacts of the proposed bridge project on health. A recent Health Impact Assessment completed by the Multnomah County Health Department² found that "all of the proposed options for the I-5 bridge expansion (both "build" and "no build" options) have significant potential to affect the health residents of both Multnomah and Clark Counties." Top concerns include toxic air pollution, noise, and obesity (related to increased drive time).

O-004-006 Climate change and greenhouse gas emissions need to be dramatically reduced.

We support Oregon's goal of reducing our greenhouse gas emissions to pre-1990 levels in order to avert the worst of predicted climate change. As public employees, we will be responsible for both implementing the directives of the Governor's Climate Change Commission, and managing the consequences of the climate crisis. The changes needed to achieve the state's greenhouse gas emission goals will be difficult as it is. We fear that a larger Columbia River bridge is a step in the wrong direction for meeting these targets.

O-004-007 Before, we the members of the Oregon AFSCME Environmental Caucus are calling on our regional leaders to agree on a plan for the CRC that supports the existing statewide goals for greenhouse gas emissions reductions, is protective of public health, and is fiscally responsible. The CRC should balance transportation improvements and the desire to create family wage construction jobs with other planning needs. This project should serve as a symbolic link to a future for our region that is built on smart, sustainable planning; one that our union can be proud of.

¹ "Financial Risks of the Columbia River Crossing", Joe Cortright. June 2, 2008.

http://smarterbridge.org/sites/default/files/cortright_CRC_financial_risk.pdf

² Letter from Multnomah County Health Department director and Health Officer to Columbia River Crossing dated June 9th, 2008.

http://www.co.multnomah.or.us/health/documents/CRC_%20DEIS_response.pdf

O-004-002

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

O-004-003

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 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. As Oregon and Washington businesses and residents will benefit from the project's multi-modal improvements, both states have been identified as contributors to the project. As jurisdictions on both sides of the river seek to encourage non-auto travel, tolls are not anticipated for bikes, pedestrians, and transit users. Lastly, CRC assumes funds allocated to other projects and purposes would remain dedicated to those projects and purposes.

O-004-004

Thank you for taking the time to submit your comments on the I-5 CRC DEIS. This project does include an increase in highway capacity within the I-5 corridor. However, there are many critical factors which differentiate this from previous highway projects which have come to be associated with poor planning. Firstly, this corridor is critically congested, despite attempts to increase transit service, encourage cycling, and promotion of special trip-reduction programs such as Southbound Solutions. This new capacity, however, will not open new lands for development nor will it significantly improve travel times for commuters whose origin or destination lie outside the urban area. This is an improvement within the urban core of the Portland-Vancouver area

and will attract new development nearby. This new development, being within the urban core where incentives, zoning, and land prices encourage compact urban development, will include a mix of uses and transit oriented developments.

In addition to these factors, the CRC project will introduce light rail transit to Vancouver and to Clark County. The project will also utilize tolls and a congestion pricing system to further reduce peak period commuting by car. In fact, the completed project is projected to result in fewer river-crossing vehicle trips than if no project were completed at all.

O-004-005

The Draft EIS evaluated each of the five concerns identified in the Multnomah County Health Department's letter submitted June 9, 2008. Following are these five concerns and how the DEIS addressed each of these issues:

1. Transportation: "Traffic volumes in 2030 and beyond are likely to affect human health through air quality, noise, obesity, and unsafe conditions." The DEIS stated that a replacement bridge with a toll on I-5 would reduce daily traffic volumes over the I-5 bridges by about 3%. This reduction in volume was evaluated for its effect on air quality, noise, and traffic safety as described below. Obesity was not explicitly evaluated, but the DEIS did discuss the project's potential for encouraging pedestrian friendly development around transit stations which could indirectly influence local obesity rates.
2. Safety: "Bridge alternatives that provide opportunities for more cars to travel faster may increase the number and severity of collisions." A key element of this project is improving traffic safety and reducing the number and severity of collisions on I-5. The DEIS discussed the project benefits to traffic safety provided by increasing shoulder widths over the bridges, eliminating the sightline problems created by the existing

bridges' "hump", and lengthening merge distances and providing auxiliary lanes to reduce weaving movements from traffic entering and exiting the freeway. While the project would increase average travel speeds, traffic safety is expected to improve significantly with this project because it fixes many substandard highway design features existing in the I-5 corridor.

3. Air Quality: "Air pollution has the potential to affect a large proportion of the population in the project area and should be a major criterion in the final selection of the bridge." The analysis of air quality documented in the DEIS indicates that future emissions in the project area are expected to be substantially lower than current levels.

4. Noise: "Harmful noise levels from traffic are associated with increases in chronic diseases and cognitive functioning." The CRC project will include a variety of mitigation measures to reduce noise from I-5 traffic on adjacent residents and businesses. The DEIS identifies several locations where noise walls could be added or rebuilt, and notes that the Federal Transit Administration also allows residential sound insulation to reduce interior noise from transit vehicles. Overall, these measures are expected to significantly reduce the number of impacted residents and businesses compared to future conditions without the CRC project.

5. Environmental Justice: "The CRC project poses the potential for disproportionate adverse health impacts on susceptible populations as a result of all the concerns stated above." The Draft EIS evaluated all the effects listed above, and found no potential for any adverse effects to be disproportionately borne by low-income or minority populations.

The Draft EIS evaluated several environmental effects that can influence human health. In general, the project is not anticipated to have adverse effects on human health. The Final EIS evaluated the same range of

environmental effects as the DEIS, but with a focus on the LPA. The findings in the FEIS were similar to those in the DEIS.

O-004-006

Based on modeling and analysis, the CRC LPA is expected to significantly increase transit ridership and reduce the number of vehicles crossing the river. This shift toward transit, reduction in auto crossings, reduced congestion, removal of bridge lifts, and lower accident rates are all factors that contribute to lower CO2 emissions with the project than without it. These factors will also make it easier for the region to meet goals for reducing greenhouse gas (GHG) emissions.

While there was no standard threshold or standardized methodology for estimating GHG emissions when the DEIS was being developed, the project team worked with federal and state agencies to develop an appropriate analysis methodology that would allow disclosure of impacts and a comparison of alternatives. Chapter 3 (Section 3.19) of the DEIS summarized the results of GHG emissions and climate change analysis conducted for the DEIS alternatives. Further detail was included in the Energy Technical Report that was released along with the DEIS. Following the public comment period on the DEIS, the Metro Council and Portland City Council requested the CRC project team secure independent review of the GHG evaluation conducted for the DEIS. The “Columbia River Crossing Greenhouse Gas Emission Analysis Expert Review Panel Report” (January 8, 2009) describes the activities and findings of the independent review panel. The panel concluded that the GHG evaluation methods and the findings in the DEIS were valid and reasonable. They also found that the findings were likely conservative, and that the LPA would likely reduce GHG emissions even more than estimated in the DEIS. The GHG and climate change analysis in Chapter 3 (Section 3.19) of the FEIS updates the analysis that was in DEIS, but the basic conclusion that the LPA would have lower emissions than No-Build Alternative remains unchanged.

The CRC project embodies nearly all of the Governor's Climate Change Integration Group's recommendations for planning transportation projects to reduce GHG emissions. These recommendations include highway tolling, relieving chronic highway bottlenecks, increasing transit, and increasing pedestrian and bicycle facilities. Meeting the legislative goal to reduce future statewide emissions below 1990 levels will require numerous actions in all sectors. There is no requirement or expectation in law or policy that any single action by itself should or can have the effect of reducing future emissions below existing emissions. Such broad reductions can only result from a wide variety of actions. As stated in the DEIS, the preferred alternative by itself would reduce GHG emissions compared to No-Build Alternative. This helps move GHG emissions in the right direction, and when combined with other actions, can play an integral role in helping the state meet its overall greenhouse gas reduction goals.

O-004-007

Preferences for specific alternatives or options, as expressed in comments received before and after the issuance of the DEIS, were shared with local sponsor agencies to inform decision making. Following the close of the 60-day DEIS public comment period in July 2008, the CRC project's six local sponsor agencies selected a replacement I-5 bridge with light rail to Clark College as the project's Locally Preferred Alternative (LPA). These sponsor agencies, which include the Portland City Council, Vancouver City Council, TriMet Board, C-TRAN Board, Metro Council, RTC Board, considered the DEIS analysis, public comment, and a recommendation from the CRC Task Force when voting on the LPA.

With the LPA, new bridges will replace the existing Interstate Bridges to carry I-5 traffic, light rail, pedestrians and bicyclists across the Columbia River. Light rail will extend from the Expo Center MAX Station in Portland

to a station and park and ride at Clark College in Vancouver. Pedestrians and bicyclists would travel along a wider and safer path than exists today.

For a more detailed description of highway, transit, and bicycle and pedestrian improvements associated with the LPA, see Chapter 2 of the FEIS.