


From: [Kevin Matthews](#) 
To: [Draft EIS Feedback](#);
CC: [Friends of Eugene Board of Directors](#);
Subject: Comments on Columbia River Crossing Draft EIS
Date: Tuesday, July 01, 2008 4:50:26 PM
Attachments:

Re: CRC DEIS COMMENTS

To: Columbia River Crossing
 c/o Heather Gundersen
 700 Washington Street, Suite 300
 Vancouver, WA 98660

Dear CRC Team et al.,

O-025-001 Thank you for the opportunity to comment on the draft environmental impact statement for the Columbia River Crossing project (CRC DEIS).

We have reviewed this document fully recognizing that our cities, state, region, nation, and indeed our planet are at a critical crossroads of change with regard to transportation planning. In one direction, the road continues the general tenor of analysis and hence the kind of conclusions seen in business as usual over the last half-century. In the other direction, the road-to-date less traveled, lies the substantive response to the threat and reality of anthropogenic climate change.

We fear that the CRC DEIS lies in the main direction. In terms of analysis, because of the fatally-incomplete review of impacts due to induced traffic related to land use changes, the current work is inadequate to properly authorize such a significant project at this time. In terms of conclusions, the preferred alternative represents an unacceptable misallocation of essential resources in a time of an unfolding crisis in transportation.

O-025-002 The State of Oregon has adopted goals by legislation for reducing greenhouse gas emissions to 10% below 1990 levels by 2020, and to 75% below 1990 levels by 2050. While the latest climate science suggests those goals are not stringent enough to prevent triggering disastrous climate switches, the adopted goals are sufficient for immediate planning purposes.

Transportation planning that projects to meet those adopted goals, as it is moral

O-025-001

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

O-025-002 imperative that the CRC DEIS must, will need to show assurance of high levels of vehicle miles traveled (VMT) reduction over time.

In fact, simple calculations using stabilization wedges as well as other approaches show that to project transportation sector compliance with greenhouse gas emission reduction goals, using currently-demonstrable or reasonably-expected technologies, VMT reductions on the order of 50% are required over the next 20 years or so.

This reality has two profound implications, which are difficult to avoid:

1) The only new large transportation projects which can be considered acceptable at present are those which are aimed directly at reducing VMT. This implies, for instance, that 90% or more of transportation funding needs to be allocated to low-emissions public transit for people and rail for freight, rather than conventional over-the-road vehicle capacity building.

2) Projects that are proposed primarily for congestion-reduction and capacity building are literally pointless. When we make the correct alternative investments to reduce VMT, we will see continuing and increasing drops in highway traffic levels - as we have in fact started to see already in 2008 over 2007 under the influence of higher gas prices.

Conservatively, each extra lane-mile added to a congested highway will increase emissions of carbon-dioxide, the main greenhouse gas, by more than 100,000 tons over 50 years, even assuming major improvements in vehicle fuel efficiency, as shown by the Sightline Institute and others (http://www.sightline.org/research/energy/res_pubs/climate-analysis-gge-new-lanes-10-07, <http://www.smartgrowthamerica.org/gcindex.html>).

O-025-003 A sprawl-inducing bridge expansion would increase regional VMT, at a time when all significant transportation investments must be concentrated on safely and economically reducing VMT.

How much more public resource must Oregon devote to going down the wrong path, before we turn to the new path - as we know we must? Will Portland go down in history as spending billions on one of the last horrible dinosaurs of the backward, unsustainable 20th Century approach to highway planning? Or will we go down in history as one of the first regions to act in accord with to our own knowledge and rhetoric, leading forward in this new millennium?

This is one dimension of the future for which the crystal ball is as easy to read as a mirror on the wall. We must stop now in building large new highway projects to support traffic increases that will not even be there - traffic increases that cannot be allowed to be there - traffic increases that we must indeed plan and build so as to eliminate.

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.

O-025-002

Regarding induced growth, see O-025-001. Regarding the Sightline Report, see B-048-008.

While there was no standard threshold or standardized methodology for estimating greenhouse gas 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. The DEIS, Chapter 3 (Section 3.19.8), 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 CRC project team was requested by the Metro Council and Portland City Council to 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

Now is the time to rise to the call of an epochal emergency.

Do the math; don't do the project.

Sincerely,

Kevin Matthews
President
Friends of Eugene
PO Box 1588
Eugene, OR 97440

--

Together it is within our reach:

<http://www.FriendsofEugene.org>

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, remains unchanged. Based on the 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 crossing, 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 GHG emissions. The CRC project embodies nearly all of the Governor's Climate Change Integration Group's recommendations for planning transportation projects to reduce greenhouse gas 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 greenhouse gas emissions compared to No-Build. This helps move greenhouse gas 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-025-003

Following the selection of the LPA in July of 2008, the CRC Project Sponsors Council (PSC) was developed to provide recommendations to the project on a variety of issues, including the number of add/drop lanes

over the river crossing. Over the course of several months, PSC was provided with operational characteristics and potential environmental impacts of 8-, 10-, and 12-lane options. In addition to the technical information, PSC received input from CRC advisory groups and reviewed public comment submitted to the project and obtained during two public Q&A sessions in January 2009 regarding the number of lanes decision, as well as hearings conducted by Portland City Council and by Metro Council. In August 2010, PSC voted unanimously to recommend 10 lanes for the replacement bridges. For more information regarding the number of lanes decision making process, see Chapter 2 (Section 2.7) of the FEIS.

In addition to decisions regarding the number of lanes, the CRC project is considering more than two dozen TDM/TSM strategies to include in the project. The project team will continue to support regional efforts aimed at reducing travel demand and improving system efficiency, including introducing variable tolling and adding high capacity transit. WSDOT has a very successful, and state-mandated, commute trip reduction program, which will provide CRC with access to state contacts and best practices for working with employers. Many other region-wide programs and strategies will be outside the control of the state transportation departments, though ODOT and WSDOT will continue to support activities aimed at reducing travel demand.