

**From:** [steve.cook@bullivant.com](mailto:steve.cook@bullivant.com)  
**To:** [Columbia River Crossing](#)  
**CC:**  
**Subject:** Comment from CRC DraftEIS Comments Page  
**Date:** Thursday, May 29, 2008 11:41:41 AM  
**Attachments:**

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Home Zip Code: 97205  
 Work Zip Code: 97204



Person:

Person commutes in the travel area via:  
 Car or Truck

**P-0681-001**

1. In Support of the following bridge options:  
 Supplemental Bridge  
 Do Nothing
2. In Support of the following High Capacity Transit options:  
 Bus Rapid Transit between Vancouver and Portland  
 Light Rail between Vancouver and Portland
3. Support of Bus Rapid Transit or Light Rail by location:  
 Lincoln Terminus: No Opinion  
 Kiggins Bowl Terminus: No Opinion  
 Mill Plain (MOS) Terminus: No Opinion  
 Clark College (MOS) Terminus: No Opinion

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 Portland, or 97205

Comments:

**P-0681-002** I have serious reservations about what appear to be the leading proposals on the I-5

**P-0681-001**

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.

**P-0681-002**

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

- P-0681-002** bridge project. In particular, I am very skeptical of any proposal that would increase traffic capacity on the bridge:  
 -- Increasing capacity would likely just encourage more traffic, which is the last thing we should be doing. From what I've seen the problem is largely caused by people who have chosen to live in one state and commute to the other state, and if we increase the capacity of the bridge we're likely to encourage more such commuting. That could simply lead to the new, wider bridge becoming clogged when, once again, commuter traffic grows until it slows traffic.  
 -- I also don't want to encourage driving due to its contribution to global warming and air pollution.  
 -- As an Oregonian I am opposed to anything that further encourages people with jobs in Oregon to live in Washington (taking some of their taxes with them). A bridge with more capacity would do that.  
 -- As someone who seldom drives this route, I am opposed to spending the kind of money I've heard rebuilding the bridge would require (\$4 billion plus). There are other things I would rather see my taxes go toward.
- P-0681-003** -- As someone who now and then drives this route, I'm willing to put up with the congestion when I do.
- P-0681-004** -- Therefore, I prefer either the "No Build" alternative, or a much more modest project which would simply repair/renovate the existing bridges so that they would be safer. The summaries of the other proposals don't appeal to me because they all appear to involve additional traffic lanes.
- P-0681-005** -- The only other thing I would support would adding a light rail only bridge to provide a light rail alternative to driving (while not increasing auto traffic capacity) or building a new bridge with three traffic lanes only (no additional traffic lanes) plus light rail.
- P-0681-006** However, given Clark County's cool reaction to light rail so far, I'm not sure building a light rail bridge into Clark County would be a wise use of the dollars.
- P-0681-007** -- I agree with those who wonder whether rising gasoline prices are going to largely solve or reduce the congestion issue without building any new traffic lanes. It would be a shame to spend \$4 billion plus on a bigger bridge if it turned out that we would be driving less, and a bigger bridge would not be needed.
- P-0681-008** Therefore, I encourage the decision-makers to (1) slow down and not make a decision any time soon; (2) and reconsider what appear to be the leading alternatives.

-- Steve Cook

Portland, Oregon

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 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.

**P-0681-003**

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

**P-0681-004**

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. These technical evaluation criteria included, but were not limited to, traffic safety, congestion, traffic diversion onto local streets and I-205, regional vehicle miles travelled, transit ridership, regional economic impact, effects to neighborhoods, and protected species and habitats. 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, the PSC voted unanimously to recommend that the replacement bridges be constructed with 10 lanes and full shoulders. For more information regarding the number of lanes decision making process, see Chapter 2 (Section 2.7) of the FEIS.

The proposed new lanes are add/drop lanes (i.e., lanes that connect two or more interchanges), which are used to alleviate safety issues associated with the closely spaced interchanges in the project area, and

accommodate the 68 to 75% of traffic that enters and/or exits I-5 within two miles of the Columbia River.

**P-0681-005**

A supplemental bridge that only includes improvements for transit and/or bicycles and pedestrians does not meet the CRC project's Purpose and Need. As described in Chapter 1 of the DEIS, the project's Purpose and Need "was developed by relying on previous planning studies, solicitation of public input, and coordination with stakeholder groups."

In addition to calling for improved bicycle, pedestrian and transit connectivity, the Purpose and Need also specifically states the need for improving highway freight mobility, travel safety and traffic operations, and the structural integrity of the existing bridges. These later needs would not be met by a supplemental bridge alternative that only provides for transit and/or bicycles and pedestrians.

**P-0681-006**

Light rail has been endorsed by every local Sponsoring Agency (Vancouver City Council, C-TRAN, RTC, Portland City Council, TriMet, and Metro), whose boards are comprised of the elected leadership of the region.

Annual light rail passenger trips crossing the I-5 bridge in 2030 are projected to be 6.1 million, with daily ridership around 18,700. The travel time for the morning commute by light rail between downtown Vancouver and Pioneer Square in downtown Portland will be approximately 34 minutes. Light rail would travel on a dedicated right-of-way, with more reliable travel times than auto drivers dealing with unpredictable road conditions, traffic congestion, and parking challenges.

The CRC project planning for light rail incorporates and supports the principles of the Vancouver's City Center Vision Plan. Downtown

Vancouver has seen recent growth in higher density mixed use projects from three to 12 stories in height. In addition, another 4,000 downtown condominiums are proposed or pending as part of new developments. The core of Vancouver has, along with many of the larger corridors such as Fourth Plain Blvd, medium to high density residential development and an urban mix of uses. Transit demand in these areas is quite high, and ridership will increase with the introduction of light rail.

Long-term operation and maintenance of the new light rail line will be funded through C-TRAN and TriMet. For its share of the operations and maintenance funding, C-TRAN plans on having a public vote.

**P-0681-007**

Significant increases in oil prices can have both short term and long term effects on travel behavior. In the short term, the options for responding to rising gas prices are more limited, and include driving less and/or changing from driving to walking, biking or transit for at least some trips. During recent increases in gasoline prices transit use increased and off-peak highway travel decreased. Peak period highway travel changed little.

Over the long term, there are more options for adjusting to changes in gasoline prices, besides changing driving behavior. Technological advances and legislative mandates can increase fuel efficiency standards in the long term. In turn, as older vehicles wear out, more consumers can replace them with more fuel efficient vehicles. Automobile manufacturers are developing and will continue to develop new vehicle and engine technologies that require much less, or even no, petroleum-based fuels. This trend is already happening as evidenced by the growing popularity of gasoline-electric hybrid and small electric vehicles.

**P-0681-008**

Extensive technical and public review and input has been included in all phases of the CRC project, from developing a purpose and need statement, screening a wide variety of alternatives, and developing a Draft and Final EIS. A supplemental draft is required if changes to alternatives after the draft are substantial and/ or if there are new significant impacts not previously discussed in the draft and/or there are changes in laws or regulations after the draft. The DEIS identified potential mitigation measures for all potentially significant as well as many non-significant impacts, and the FEIS further analyzes and develops mitigation measures and plans to a higher level of detail and refinement. CEQ NEPA regulations (40 CFR 1502.9(c)) do not require agencies to prepare a supplemental draft EIS just because an FEIS includes refined alternatives and additional information. Such changes are typical and expected in the planning process, and are consistent with CEQ and FHWA NEPA regulations. Between publication of the DEIS and FEIS, FTA and FHWA prepared three NEPA re-evaluations and a documented categorical exclusion (DCE) to complete changes in the project since the DEIS. The NEPA re-evaluations addressed the change in the project from: 1) the 17th Street transit alignment, 2) the composite deck truss bridge type, and 3) all other changes in design between the DEIS and the FEIS. The DCE addressed the impacts from the track work on the steel bridge.

Both agencies concluded from these evaluations that these changes and new information would not result in any significant environmental impacts that were not previously considered in the DEIS. For more information, see Appendix O of the FEIS.