



**From:** [christi@chaikana.org](mailto:christi@chaikana.org)  
**To:** [Columbia River Crossing](#)  
**CC:**  
**Subject:** Comment from CRC DraftEIS Comments Page  
**Date:** Tuesday, June 17, 2008 10:43:50 PM  
**Attachments:**

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Home Zip Code: 97217  
 Work Zip Code: 97217

Person:

Person commutes in the travel area via:

- P-1091-001**
1. In Support of the following bridge options:
  2. In Support of the following High Capacity Transit options:
  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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- P-1091-002**
- Comments:  
 NEPA regs at 1506.6 say that Agencies shall make diligent efforts to involve the public in preparing and implementing their NEPA procedures, which has frequently been pointed to in court to make the case that agencies needed to inform the public what their role is during scoping periods, public comment periods, etc. NEPA regulations (40 CFR 1503.3) say that the purpose of the public comment period after the draft is released is in order for the public and agencies to comment on the adequacy of your analysis. The

### **P-1091-001**

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-1091-002**

Since the project began, CRC has had a goal of engaging the public in meaningful and productive ways. Multiple methods have been used to meet this goal so as to address the needs of a wide variety of publics and the project decision-making process. Examples include workshops with facilitated small-group discussions, open houses where participants can talk one-on-one with staff, public hearings, presentations and discussion at community and neighborhood-sponsored meetings, and advisory group meetings where CRC seeks recommendations from a

- P-1091-002** public comment period on this Draft appears to be a vote regarding the alternatives. While I do appreciate your efforts to poll the public on their opinions at this stage, it appears that you're deflecting the true purpose of the role of the public comment period.
- (And by the way: NEPA regs at 1502.7 say that an EIS should normally be less than 150 pages and for proposals of unusual scope or complexity shall normally be less than 300 pages.)
- At the same time, you're doing a public poll but apparently only among the public who is interested enough to read the EIS and choose to comment, which isn't an adequate representation of the public. What purpose does this poll serve? Is the decision maker going to use this informal poll in their decision?
- P-1091-003** An analysis of the adequacy of DEIS would include such issues as:  
 \* A base assumption of this EIS appears to be that traffic will continue to increase. Given other issues such as rising gas prices, a shifting demographics in the population who seem to want to find other options to transport besides burning fossil fuels (irregardless of the price of gas), and a limit on parking spaces in downtown Portland, I don't agree with your base assumption, and think that you need to take a very close study as to whether traffic will really increase.
- P-1091-004** \* You fail to discuss carpool lanes.

citizen committee. These events and meetings have taken place at a variety of locations, days of the week and times of the day to meet the needs of the entire community. In addition to meeting with citizens directly, the CRC project has also used electronic surveys and opinion polling to gain more information on public attitudes and behaviors. None of the public involvement and surveying tools discussed above constitute a decision-making process, rather, they provide a dialogue through which the community can help inform project analysis and decisions while themselves gaining more project related technical information.

Regarding the length of the DEIS, the length was neccissitated by the level of detail it provided. The level of detail in the DEIS was intended to inform the public and other stakeholders with relevant information in order to understand the impacts and trade-offs associated with various alternatives. While some readers felt that the DEIS did not have enough detail, others felt that it was too long and detailed. For those who wanted more detail, the DEIS referred them to the technical reports that informed the analysis presented in the DEIS. These were made available on CD and on the project web site, as well as in hard copy. For those who felt that the DEIS was too detailed, an executive summary was distributed along with the DEIS and made available separately in hard copy and on the project web site. In addition to information available in the DEIS and technical reports, the CRC project made good faith efforts to provide additional information upon request.

### **P-1091-003**

Traffic forecasts reported in the DEIS and used to inform decisions on a locally preferred alternative were derived from adopted regional employment and population forecasts and state-of-the-art modeling and evaluation conducted by Metro, RTC and the project team, and reviewed by all project sponsor agencies as well as FTA and FHWA. In addition, an independent panel of traffic modeling experts was convened in

October 2008 to review the modeling methods and findings. These experts concluded that the project's approach to estimating future travel demand was reasonable and that it relied on accepted practices employed in metropolitan regions throughout the country. These findings are summarized in the "Columbia River Crossing Travel Demand Model Review Report" (November 25, 2008). This independent review confirmed the approach CRC modeling used to address multiple variables that can affect travel demand, including gasoline prices, tolling, travel demand measures and induced development.

**P-1091-004**

The CRC project does not include HOV lanes inside its five-mile project area. The CRC project team looked at HOV lanes and freight lanes, which are typically located on the inside freeway lane next to the barrier, as part of its technical analysis. Because about 70 percent of the vehicles enter and/or exit I-5 within the five-mile study area, access to and from a HOV lane or freight lane could create traffic operational problems by increasing lane changes (for example, HOVs entering the freeway and needing to merge all the way to the inside lane). The results of this analysis is described in more detail in section 3.1 of the DEIS. Regarding the existing HOV lanes located outside the project area, the CRC project does not propose any changes. These HOV lanes might effectively link to HOV lanes in the CRC area in the future, if employed as part of a larger regional plan. Should the region adopt and develop a larger HOV system, lanes within the bridge influence area could potentially be striped as part of that network.