

Dear Metro,

Thank you for your letter of endorsement of the Modified Locally Preferred Alternative (LPA) dated July 2022. The Modified LPA's adoption reflects a great accomplishment due to the hard work of regional elected officials, as well as local jurisdictional leadership over the past year. Not everyone got exactly what they wanted in the Modified LPA, but all got what is needed; a path forward to a new bridge that will keep our region connected for a century to come.

In addition to your endorsement, Metro attached 41 conditions. Between the eight jurisdictions endorsing the Modified LPA we received 175 conditions in total. The IBR team has reviewed in detail all conditions submitted. The majority of agency conditions were in harmony with others received and many were already included in the program. Responses to these conditions can be found in the document labeled *Attachment A*.

There were some conditions submitted that are contradictory to other agencies' conditions. Additionally, some conditions requested work or components not previously included in the program or have taken longer to adequately address. I have attached a list of five of Metro's conditions largely related to greenhouse gas (GHG)/vehicle miles traveled (VMT) and additional transit measures in Attachment B. We will continue to work with Metro staff to identify a regional approach to these items. Though ESG meetings and the IBR website will keep you apprised of our progress, I will send you another formal response reporting back on how we've successfully addressed the remaining conditions.

Rather than delay my response until every condition has been addressed, I wanted to communicate my gratitude for your endorsement and assure you that your conditions are, and will continue to be, examined. Thank you again for participation in the regional effort to replace the bridge and keep the economy of the region strong through an environmentally-sound and culturally-sensitive replacement structure.

Sincerely,



Greg Johnson
IBR Program Administrator

ATTACHMENT A

Agency Name	#	Condition	Response
Metro	5	Implement and operate variable rate tolling, along with improvements to transit and active transportation, in a manner that aims to reduce greenhouse gas emissions.	These are core elements of the IBR program. The program plans to include Travel Demand Management (TDM) tools coinciding with the opening of new robust transit opportunities and tolling implementation. The program will analyze a range of toll rates and recommend toll policies and rates to the transportation commissions based on input from partners and the community. Variable rate tolling is assumed.
Metro	6	The project should continue to apply the equity framework agreed upon by project partners and meaningfully engage equity priority communities throughout the IBRP to inform decision making and achieve equitable outcomes.	A core objective of the program's community engagement efforts is to prioritize interacting with equity-priority communities. The EAG will continue to advise on the development of equity performance measures, monitoring implementation of the equity framework, and the development of a Community Benefits Agreement (CBA). The various program disciplines have begun using the framework's accountability tool, which will demonstrate how equity is incorporated into key decisions and activities. Results will be shared periodically with program leadership and the EAG.
Metro	7	Develop Community Benefits Agreement(s) with the communities to mitigate for any potential adverse impacts to human health and improve multimodal access for communities in or near the project area.	The program has begun to develop the Community Benefits Agreement (CBA) framework, however potential impacts to the community and environment, and appropriate mitigation, will be analyzed through the SDEIS. Substantial improvements to multimodal access are occurring as part of the Modified LPA.
Metro	8	Commit to robust community engagement throughout all stages of the project, including design and construction.	The IBR program will continue to engage with communities throughout the next phase of the process. Including, but not limited to, online and in-person open houses, public meetings, community briefings, tabling events, community surveys, and direct stakeholder outreach. Input

Agency Name	#	Condition	Response
			gathered from the community and from advisory groups or future working groups will be documented and shared with the program team, reported on, and shared with the community in a way that demonstrates how feedback is shaping the program outcomes. Specific engagement points will occur in which the program will be seeking input on design refinements or other program decisions and will engage the community in two-way conversations and through surveys to gather input. All engagement opportunities will be accessible and transparent.
Metro	9	Evaluate and implement equitable outcomes using the performance measures developed by the IBRP Equity Advisory Group (EAG) to measure benefits and impacts to equity priority communities in the SEIS.	The Equity Advisory Group (EAG) is actively involved in all phases of the program helping to ensure the program continues to prioritize equity, including developing recommendations for equity-specific performance measures for the program. These performance measures will enable us to track our success toward meeting our six core equity objectives, which will include informing how and where strategies need to be modified. Additionally, part of the SDEIS will include both the Environmental Justice (EJ) analysis as well as an Equity Report. The Equity Report is broader in scope than the EJ analysis and will analyze transportation-related disparities. The mitigations will be identified through the SFEIS with the advisement of the EAG and ESG.
Metro	10	Under the purview of the EAG, implement contracting and workforce strategies that hire and train local minority-owned contractors and small businesses for both short-term and long-term jobs, using strategies that align with regional Construction Careers Pathways Program.	The program is in the process of assessing gaps between the existing workforce and the future workforce needs for successful project delivery. This will inform our workforce development partnerships and strategies we deploy, elements of which are likely to be included in a Community Workforce Agreement (CWA) and/or Community Benefits Agreement (CBA). The CWA Framework will consider the known resources in the region to

Agency Name	#	Condition	Response
			<p>achieve equitable outcomes. We will consider leveraging local programs, including the Construction Careers Pathways Program, as much as possible. Specifically, we anticipate including requirements for a training program, as well as hiring local residents and members of equity-priority communities. The CBA will also include ambitious targets for contracting with minority- and woman- owned firms. The program will engage with the EAG while developing these agreements, as well as the program partners in development and implementation.</p>
Metro	11	<p>Work with local health agencies to develop a health impact assessment.</p>	<p>The program is currently planning to complete a Health Impact Assessment in 2023. A technical report in the SDEIS will also be analyzing potential impacts to human health in regard to air quality (mobile source air toxins, particulate matter, etc.).</p>
Metro	12	<p>To meet Metro Council's climate, safety, mobility, equity, and land use goals as identified in the 2018 Regional Transportation Plan and the 2040 Growth Concept, it is essential that variable rate tolling is implemented in conjunction with providing a range of transportation options with the goal of reducing driving.</p>	<p>Tolling is being recommended to both finance the program, as well as be used for congestion management. Variable rate tolling is assumed. The program will analyze a range of toll rates and recommend toll policies and rates to the transportation commissions based on input from partners and the community. The program includes improvements to transit, pedestrian/bicycle, and auto elements to provide for a range of transportation choices.</p>
Metro	13	<p>Implement variable rate tolling as soon as legally and practically permissible, in coordination with the Oregon Toll Program (Regional Mobility Pricing Project) in order to manage congestion and prevent diversion impacts, particularly to the I-205 corridor.</p>	<p>The program is in regular coordination with Oregon's Toll Program and will begin engaging with the commissions late this year or early next year and will likely meet regularly throughout 2023. The IBR program will not set the rates but can recommend early tolling to the states' transportation commissions, which is consistent with the program's Financial Plan.</p>

Agency Name	#	Condition	Response
Metro	14	Develop a variable rate tolling program that advances equity and climate goals.	It is the goal of the IBR program to have a variable rate tolling structure that is mindful of the program’s goals to raise revenue for the construction and operation of the facility, assists in congestion management, and advances the program’s commitment to equity and climate. The program plans to include TDM tools coinciding with the opening of new robust transit opportunities and tolling implementation. The program will coordinate with partners to identify TDM opportunities.
Metro	15	Develop a low-income program to address potential financial impacts of tolling on low-income persons.	The equity team has begun to engage the EAG around this topic, including learning about ODOT's low-income toll program. The program is committed to recommending a low-income toll program be part of the tolling plan as determined by the transportation commissions.
Metro	16	With implementation of tolling, provide and publicize a wide range of alternative transportation options including high-capacity transit with good connections to bus rapid transit and other bus lines, and improved bike and pedestrian facilities easily accessible to the project area; in addition, encourage other low-carbon modes of travel such as vanpooling.	The program plans to include TDM tools coinciding with the opening of new robust transit opportunities and tolling implementation. The program will coordinate with partners to identify TDM opportunities.
Metro	17	Conduct an investment grade analysis of the toll revenue.	An investment grade analysis will be completed as part of the Level 2 and Level 3 Traffic and Revenue Studies. The Level 2 Traffic and Revenue Study began in mid-2022 with the goal to complete it by mid-2023. The Level 2 Traffic and Revenue Study will test policies and multiple toll-rate scenarios and how they affect demand in the corridor in coordination with OTC and WSTC. The program anticipates completing an Investment Grade Traffic and Revenue Analysis (Level 3 Traffic and Revenue Study) in 2025, which is

Agency Name	#	Condition	Response
			needed for toll bond financing and must be completed close to the beginning of toll operations or prior to the financing, whichever comes first. The planned timing to conduct an investment grade analysis on the program is consistent with best practices. The community and program partners will have access to this information after it is developed.
Metro	18	The project should commit to exceptional bike and pedestrian facilities on the replacement bridge, bridge approaches, and throughout the bridge influence area that provide a desirable transportation option that accommodates current and attracts new bikers and walkers.	Creating improved active transportation facilities within the IBR program area is part of the program. The program will work with partners to make active transportation connections within the IBR program area.
Metro	19	Undertake additional design to provide high-quality, safe bike and pedestrian facilities across the bridges and connections to transit stops and neighborhoods throughout the bridge influence area.	Creating improved active transportation facilities within the IBR program area including connections to transit stops and neighborhoods is part of the program.
Metro	20	Design of active transportation facilities should adhere to ODOT's Blueprint for Urban Design principles.	The design team is following appropriate jurisdictional guidelines, including ODOT's Blueprint for Urban Design principles, based on the ownership, operation, and maintenance of the facility.
Metro	21	Mitigate for bike and pedestrian access impacts caused by construction, ensuring safe routes and connections for those modes are maintained.	All vehicle, bike, pedestrian, and transit impacts caused by construction will be analyzed, and a mitigation plan developed in a Transportation Management Plan. This Plan will be required to be included in the contract documents for construction. The program will work to make various modes, including active transportation and transit elements, accessible as soon as possible within the construction schedule, sequence, and staging. Thru-put of the existing

Agency Name	#	Condition	Response
			facility for active transportation will remain during construction.
Metro	22	Light rail must be included in the infrastructure package that goes to construction, acknowledging that the region may need to address future projected capacity limits of the light rail line. Transit ridership in the project area should be optimized to improve the transit network to meet the region's needs today and into the future.	Light rail received partner consensus as part of the Modified LPA and is moving forward for further study in the SDEIS. Light rail is part of the overall transit solution which also includes Express Bus service. Transit optimization is part of the current program workplan.
Metro	23	In addition to light rail, the project partners will work together to develop and refine all transit options in or near the project area, including connections between light rail, bus rapid transit, and bus service to meet the latent demand for transit service in and near the Bridge Influence Area.	The transit optimization study the program is currently undertaking analyzes the different transit options and modes of both C-TRAN and TriMet and how they can best provide comprehensive transit service, both within and through, the Bridge Influence Area.
Metro	24	Optimize bus routing and station locations on both sides of the river to provide excellent bus access to light rail, improve transit ridership, and reduce vehicle miles travelled.	The program will be working to support the optimization of bus routing and station locations in coordination with C-TRAN, TriMet, and Metro. The program will continue to work with partners and the community on transit design including the light rail alignment, station locations and design, and inclusion of bus service/connections.
Metro	25	Develop the high-capacity transit terminus in a manner that allows for future potential expansions.	The high-capacity transit (HCT) terminus is being designed so that future potential expansions of HCT are not precluded.
Metro	26	The bridge size, type, and aesthetics shall be right-sized to fit community needs and reflect regional and local community values and the historic and cultural importance of the Columbia River corridor.	The program will coordinate with partner agencies and the community as the program advances. ODOT and WSDOT use practical design principles on their projects coincidentally with direction provided in their respective Highway Design Manuals.

Agency Name	#	Condition	Response
Metro	27	Limit the design of the bridge to a total of three through lanes and one auxiliary lane in each direction.	The Modified LPA currently includes one auxiliary lane in each direction on the I-5 bridge. The program received conflicting points of view regarding the preference of number of auxiliary lanes in partner conditions. Therefore, the IBR program will analyze both one and two auxiliary lanes in each direction on the I-5 bridge and impacts will be documented in the SDEIS. Transportation performance measures that will be documented in the Transportation Technical Report will include freeway level of service, volume to capacity ratio, hours of congestion, and vehicular travel times. Other environmental discipline reports will document impacts of the one and two auxiliary lane options. Auxiliary lane performance results will be shared with program committees, groups, partners, and the community as part of the SDEIS process.
Metro	29	In design, use outcome-based, practical design principles to minimize negative impacts to communities and mitigate for traffic noise on the bridge.	ODOT and WSDOT use practical design principles on their projects coincidentally with direction provided in their respective Highway Design Manuals. The IBR program will identify noise impacts and follow ODOT and WSDOT policies that meet FHWA and FTA guidelines to mitigate traffic noise if applicable.
Metro	30	Design an architecturally attractive bridge that reflects community values and the historical significance of the bridge within the given legal and engineering constraints.	The communities on both sides of the river will be included in development of urban design and architectural guidance. The bridge architecture cannot supersede the needs for safe and reasonable accommodation of the traveling public within the budgetary constraints of the program, but every effort will be made to reflect the desires of the community in aesthetic style, representation of historic and interpretive artifacts and landscape elements while minimizing harm to existing landscaping, archeological and cultural resources.

Agency Name	#	Condition	Response
Metro	31	Engage the public to inform the aesthetics of the bridge, including artwork and other cultural elements.	The communities on both sides of the river will be included in development of urban design and architectural guidance. This is also assumed to be part of the workplan for CAG and EAG.
Metro	32	Allow for efficient movement of freight, especially to and from the Port of Portland and the Port of Vancouver.	Prioritizing freight mobility is part of the program's Purpose and Need. The program is committed to preserving and enhancing freight access and movement through the corridor.
Metro	33	After the LPA endorsement, Metro Council expects transparency and agency partnerships in the development of a financial plan that will support the project.	The IBR program team is working on updating the Financial Plan with an updated cost estimate reflecting the Modified LPA as well as updated capital sources of funds. Ongoing updates to the program's Financial Plan will be provided to partner agencies and available to the public.
Metro	34	The IBR project team will provide frequent updates on the IBR financial plan to Metro Council, including an updated Conceptual Financial Plan by the end of 2022, a Financial Plan by March 2023, and a revised cost estimate at 30% design. The Financial Plan shall include all improvements in the BIA, including local improvements.	The IBR program team is working on updating the Financial Plan with an updated cost estimate reflecting the Modified LPA as well as updated capital sources of funds. The Financial Plan update is scheduled to be completed in Q1 of 2023. Ongoing updates to the program's Financial Plan will be provided to partner agencies and available to the public. Local improvements will be included to the degree that the program is responsible for their funding and construction.
Metro	35	In a joint work session with JPACT and Metro Council, the Washington Department of Transportation will provide a presentation on the Cost Estimate Validation Process (CEVP) development, independent review, assumptions, and use. The IBR project team will provide a presentation on the cost estimate for the project with an overview of risk.	The first CEVP process is currently beginning to gather data for the program's evaluation. When the work is completed the IBR and CEVP teams will brief partners on the methodologies and results. Over the course of the program, CEVP updates will also be provided.

Agency Name	#	Condition	Response
Metro	36	Develop a financial plan that indicates the level of federal, state, and local sources of revenue.	The IBR program team is working on updating the Financial Plan with an updated cost estimate reflecting the Modified LPA as well as updated capital sources of funds. Ongoing updates to the program's Financial Plan will be provided to partner agencies and available to the public.
Metro	37	The financial plan should include assumptions about how funding from variable rate tolling will be used and implemented with the Oregon Toll Program, including an estimate of the duration of bond repayment. An analysis of the application of the Oregon Toll Program's Low Income Toll Study will be included.	The IBR program is working on a Level 2 Toll, Traffic & Revenue Analysis, the outputs of which will be included in the Financial Plan update. The Financial Plan will document assumptions associated with the range of toll funding that may be available to support the program, as well as the expenses associated with tolling. As is required by Oregon law, the IBR program will evaluate a low-income toll program. Ultimately, toll rates will be set jointly by the Oregon Transportation Commission and the Washington State Transportation Commission.
Metro	38	The financial plan must balance revenue generation and demand management, including project capital and operating costs, sources of revenue, and impact to the funds required for other potential expenditures in the region.	Tolling is being recommended to both finance the program, as well as be used for congestion management. Toll policies and rates will be set by the states' transportation commissions. Tolls will provide a sustainable source of revenues for paying for the IBR program's operations and maintenance as well as periodic capital repair and replacement costs that would otherwise require a different source of funds. A Financial Plan will be updated as the program progresses and will be available to the public as well as program partners. The program plans to include TDM tools coinciding with the opening of new robust transit opportunities and tolling implementation. The program will coordinate with partners to identify TDM opportunities.
Metro	39	The financial plan shall take into account the maintenance and operations needs of transit.	The Financial Plan update will account for the operations and maintenance of the light rail extension. The program will work with the state

Agency Name	#	Condition	Response
			and local partners to identify available sources of ongoing funding for the light rail extension.
Metro	40	Continue a robust public engagement process for input to inform the SEIS. Continue to engage the Community Advisory Committee (CAG), EAG, and Executive Steering Group (ESG), and demonstrate how committee feedback is incorporated into project efforts, timelines, and milestones. Consider a public bridge-naming process.	The IBR program will continue to engage with communities throughout the next phase of the process. Including, but not limited to, online and in-person open houses, public meetings, community briefings, tabling events, community surveys, and direct stakeholder outreach. Input gathered from the community and from advisory groups or future working groups will be documented and shared with the program team, reported on, and shared with the community in a way that demonstrates how feedback is shaping the program outcomes. Specific engagement points will occur in which the program will be seeking input on design refinements or other program decisions and will engage the community in two-way conversations and through surveys to gather input. All engagement opportunities will be accessible and transparent.
Metro	41	As a project partner, Metro Council expects to be involved in: (1) Development and completion of the SEIS and all NEPA-related activities; (2) Project design, including, but not limited to: examining ways to provide efficient solutions that meet safety, transportation, equity and climate goals, including consistency with Oregon and Washington’s statutory reduction goals for GHG emissions; (3) Development of tolling policies, revenue allocation, and toll-rate setting for the IBRP; and (4) Development of the Community Benefit Agreement.	Metro is a NEPA Joint-Lead Agency and will be involved throughout the development of the SEIS and other NEPA compliance activities. Metro will also be involved in project design, including, but not limited to: examining ways to provide efficient solutions that meet safety, transportation, equity and climate goals, including consistency with Oregon and Washington’s statutory reduction goals for GHG emissions; and development of the Community Benefit Agreement. The states’ transportation commissions will be responsible for toll rates and policies for the IBR program. Toll revenue allocation will be jointly determined by the two states.

ATTACHMENT B

Agency Name	#	Condition
Metro	1	The IBR program must demonstrate how, with comprehensive variable-rate tolling intentionally designed to manage congestion and repay construction costs and with visionary improvements in transit and active transportation options, it achieves at least a proportionate contribution to the State of Oregon’s greenhouse gas (GHG) goals that call for the state to reduce its GHG emissions (1) at least 45 percent below 1990 emissions levels by 2035; and (2) at least 80 percent below 1990 emissions levels by 2050. The construction of the bridge should use methods that provide the greatest level of sustainability possible.
Metro	2	To create baselines, determine the hourly average vehicle miles traveled (VMT) across the bridge in 2022 by mode and use evidence-based methodologies to estimate the GHG by hour in the project area.
Metro	3	Prepare an in-depth analysis of the operations of the bridge, especially as they relate to GHG and the potential for increased vehicle miles traveled through induced automobile demand. The results of the analysis, which should include assumptions regarding tolling consistent with the Oregon Toll Program, must be prominently displayed in the SEIS.
Metro	4	Implement a plan with current best practices to reduce GHG during the construction of the bridge, including the use of low-carbon materials and adherence to the Oregon Clean Air Construction Program during the construction phase of the project.
Metro	28	Minimize the width of the shoulders to address needs for transit and emergency use only. Shoulders must not be restriped and/or used to expand travel capacity except during construction or maintenance or for Bus on Shoulder.