IBR Draft SEIS - RECORD #2001 DETAIL

First Name :	William
Last Name :	Christina
Attachments :	DSEIS-2001_Christina_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2001 DETAIL

Submission Date :	11/14/2024
First Name :	William
Last Name :	Christina
Business/Organization/Agency :	

Submission Input :

How do we get to portland? The 205 bridge will be at a standstill for hours. You are foolish if you do not build the new bridge next to the existing bridge before you close it. You are going to cause gridlock 24 hours every day for years. Stupid idea.

IBR Draft SEIS - RECORD #2002 DETAIL

First Name :	Ken
Last Name :	Torre
Attachments :	DSEIS-2002_Torre_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2002 DETAIL

Submission Date :	11/14/2024
First Name :	Ken
Last Name :	Torre
Business/Organization/Agency :	

Submission Input :

The new bridge is a critical transportation route supporting hundreds of thousands users and is necessary for our economy. Supporting 100%.

IBR Draft SEIS - RECORD #2003 DETAIL

First Name :	Gary
Last Name :	Theodoriches
Attachments :	DSEIS-2003_Theodoriches_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2003 DETAIL

Submission Date :	11/14/2024
First Name :	Gary
Last Name :	Theodoriches
Business/Organization/Agency :	

Submission Input :

We need a third bridge first then rebuild I five bridge

IBR Draft SEIS - RECORD #2004 DETAIL

First Name :	AJ
Last Name :	Rogers
Attachments :	DSEIS-2004_Rogers_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #2004 DETAIL

Submission Date : 11/15/2024
First Name : AJ
Last Name : Rogers
Business/Organization/Agency :

Submission Input :

First Name:
AJ

Last Name:
Rogers

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

Topic Area:
Transportation

Comment:
I am providing this input about the future I5 bridge crossing the Columbia at the request of Chris Smith. I hope it will accomodate:
1) safe and efficient roadway for cars, trucks, pedestrians and bicycles
2) provision to automatically track and invoice bridge users with licensed vehicles similar to Washington State's toll system.

3) some form of webcam allowing people to see traffic and weather conditions at will

JCA comment #: 404

IBR Draft SEIS - RECORD #2005 DETAIL

First Name :	James
Last Name :	Wu
Attachments :	DSEIS-2005_Wu_Original.pdf (6 kb)

IBR Draft SEIS - RECORD #2005 DETAIL

Submission Date : 11/15/2024
First Name : James
Last Name : Wu
Business/Organization/Agency :

Submission Input :

First Name:
James

Last Name:
Wu

[redacted]

[redacted]

[redacted]

[redacted]

Topic Area:
Transportation

Comment:
I believe the current IBR plan to add an auxiliary lane in addition to the 3 lanes available in both directions is based on a model that has not been shown to be accurate. Real data shows that traffic is not increasing at a rate where adding another lane is necessary. In addition, the bottleneck for traffic tends to occur more south of the bridge, in Portland, compared to where the bridge is, so adding more car lanes to the bridge would not help congestion issues.

JCA comment #: 403

IBR Draft SEIS - RECORD #2006 DETAIL

First Name :	Katie
Last Name :	Kaput
Attachments :	DSEIS-2006_Kaput_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #2006 DETAIL

Submission Date : 11/15/2024
First Name : Katie
Last Name : Kaput
Business/Organization/Agency :

Submission Input :

First Name:
Katie

Last Name:
Kaput

[redacted]

[redacted]

[redacted]

[redacted]

Topic Area:
Transportation

Comment:
I live in Portland an an an all modes of transit user, including driving, transit, walking, bicycle… I am very opposed to the idea of more lanes (even as auxiliary lanes) being added to I5 and north Portland and downtown Vancouver both being damaged for decades to come by the IBR, all while failing to design the bridge in the correct way to integrate the bike paths and the transit connection. This is a bad choice for the future of these cities, and the induced demand that will erase supposed traffic benefits means it's also a bad choice for the planet more broadly and our climate goals.

JCA comment #: 402

IBR Draft SEIS - RECORD #2008 DETAIL

First Name :	Connor
Last Name :	Lennon
Attachments :	DSEIS-2008_Lennon_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #2008 DETAIL

Submission Date : 11/15/2024
First Name : Connor
Last Name : Lennon
Business/Organization/Agency :

Submission Input :

First Name:
Connor

Last Name:
Lennon

[redacted]

[redacted]

[redacted]

[redacted]

Topic Area:
Transportation

Comment:
I believe the ibr project as planned will increase the amount of vehicle miles traveled, and directly contribute to global warming. Not to mention the 8+ billion dollars used for the project would be better used to take care of our community and the people living in Portland. This project will effectively defund this we need by putting us in debt for a bridge instead of schools, addiction services, and affordable housing. Portland could cost effectively build a new bridge for less cost without expanding i5, demolishing homes and taking funding from elsewhere. Having a tunnel would allow for the water to be used by the people, instead of prioritizing cars. Put the people first.

JCA comment #: 400

IBR Draft SEIS - RECORD #2009 DETAIL

First Name :	Kevin
Last Name :	Keeney
Attachments :	DSEIS-2009_Keeney_Original.pdf (57 kb) image001.jpg (211 kb) Food Express Inc SEIS Letter.docx (49 kb)

IBR Draft SEIS - RECORD #2009 DETAIL

Submission Date :	11/15/2024
First Name :	Kevin
Last Name :	Keeney
Business/Organization/Agency :	FOOD EXPRESS, INC.
Attachments :	DSEIS-2009_Keeney_Original.pdf (45 kb)

Submission Input :

Please see attached.

FOOD EXPRESS, INC.
Kevin D Keeney
O (626) 574-9094 | C (661) 618-3248
41240 11th St W Ste B, Palmdale, CA 93551

www.foodexpressinc.com<http://www.foodexpressinc.com/>

From: kristen@iccbusiness.org <kristen@iccbusiness.org>
Sent: Wednesday, November 13, 2024 5:19 PM
Cc: ron@iccbusiness.org
Subject: 3 DAYS REMAINING - ICC Action Request: Letters Needed for IBR Draft SEIS

Business leaders -

Here's a midweek reminder that now is the time to add your voice. We need your help in contributing a letter of support for the Interstate Bridge Replacement Program. Details and instructions are included below in addition to a draft letter attached to this email for your use. As soon as we receive your letter, or get confirmation that you aren't planning to participate, we will remove you off of the reminder list.

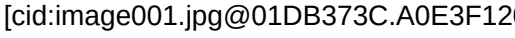
Please contact the ICC staff team with any questions.

With appreciation,

Kristen

-

Kristen Holl, Policy and Projects Coordinator
Identity Clark County<https://www.iccbusiness.org/>
360.695.4116



_____

From: kristen@iccbusiness.org<mailto:kristen@iccbusiness.org>
<kristen@iccbusiness.org<mailto:kristen@iccbusiness.org>>
Sent: Wednesday, November 6, 2024 10:28 AM
Cc: ron@iccbusiness.org<mailto:ron@iccbusiness.org> <ron@iccbusiness.org<mailto:ron@iccbusiness.org>>
Subject: ICC Action Request: Letters Needed for IBR Draft SEIS

Business leaders -

You're receiving this email because you previously contributed a letter of support for the Interstate Bridge Replacement Program, and we need your help again!

Background: We are in an open comment period for the Draft Supplemental EIS for the bridge replacement program, which is a step toward earning a federal Record of Decision to begin work next fall. ICC has continued to signal strong general support for the program without getting too granular in detail. Our voice becomes a healthy private sector counterbalance to critics who struggle to find room for negotiation and compromise. ICC's board recently received a presentation from program director Greg Johnson, and agreed to make a concerted effort to generate letters of support. This is similar to our prior efforts to support federal grants, where ICC investors and allies (including you!) produced 85 of the 125 letters submitted as attachments to federal grant applications which earned the project $2.1 billion. The process counts quantities of letters, making individual letters preferred over a single letter signed by many.

The entire document is 13,000 pages, and the summary alone is 62 pages. You can find a link (HERE<https://www.interstatebridge.org/updates-folder/supplemental-environmental-impact-statement/>) to the materials. The report presents options but many items such as bridge height will be resolved separate from this EIS document.

Here's what we request:

1. Utilize the simulated letter as a starting point and customize it as you wish. We recommend customizing, which allows personalization while maintaining several key themes moving past "form letters" which generally

are not well received.

2. Put the letter on your own stationery.

3. Submit your letter by November 15 to draftseis@interstatebridge.org<mailto:draftseis@interstatebridge.org> with the subject line "Draft SEIS public comment."

4. Email ICC a copy. We will collect letters and utilize them in advocacy efforts. (We'll also stop pestering you once we receive your letter!)

Please contact your ICC staff if you have any questions or seek help in customizing your letter.

Many thanks.

-
Ron Arp, President
Identity Clark County
ron@iccbusiness.org<mailto:ron@iccbusiness.org>

November 12, 2024

Program Administrator Greg Johnson
Interstate Bridge Replacement Program
500 Broadway St, Ste 200
Vancouver, WA 98660

Dear Program Administrator Johnson:

On behalf of Food Express, Inc., a Vancouver, WA based dry and liquid bulk food grade trucking company and it's 55 employees we offer our support for plans outlined in the Draft Supplemental EIS regarding replacing the I-5 bridge and improving its five-mile influence area.

Food Express is a for hire trucking company the specializes in transporting food grade dry and liquid bulk products throughout the Pacific Northwest. We make multiple trips per day in both directions between our Vancouver, WA terminal and destinations in Oregon. We also have several employees that utilized the I-5 bridge to commute to our Vancouver Terminal to start their workday.

Despite a very tight geographic configuration within a built environment, we support the comprehensive multi-modal program design that would accommodate an additional 66,000 person-trips and 32,000 vehicle-trips through the corridor each day by 2045, while reducing accidents and backups. The proposal makes improvements by adding safety shoulders, a dedicated public transit lane, active transportation and auxiliary merge lanes. It also makes river navigation safer and protects ecosystems through modern stormwater management.

We recommend pursuing a single-level fixed-span configuration with two auxiliary lanes, allowing for an overall more gradual grade and no traffic-stopping lift span which brings obvious improvements to congestion, accident reduction and climate.

We prefer the following:

- A second auxiliary lane wherever possible.
- Mitigation to support displaced or disrupted business during and after construction.
- A local user fee rate reflects existing tax burdens shouldered by commuters, freight and commerce, and is reduced or eliminated after construction bonds are paid.
- Consideration for workforce housing.
- Retention of C Street ramps for secondary access to downtown Vancouver.
- Commencing construction as soon as possible, given rising construction costs.

We appreciate the efforts of all involved in planning, design and funding of this critical transportation facility expected to last a century.

Sincerely,

FOOD EXPRESS, INC.
Kevin D Keeney
Kevin D Keeney
President

IBR Draft SEIS - RECORD #2010 DETAIL

First Name :	Pamela
Last Name :	Ferguson
Attachments :	DSEIS-2010_Ferguson_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #2010 DETAIL

Submission Date : 11/15/2024
First Name : Pamela
Last Name : Ferguson
Business/Organization/Agency :

Submission Input :

First Name:
Pamela

Last Name:
Ferguson

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

Topic Area:
Hayden Island Issues

Comment:
The IBR billboard on Hayden Island states "this bridge is so 1917" and implies that a new one should be built

as an update. The plan for the bridge replacement in the DSEIS seems to be so 2000! I was involved whole heartedly with the Columbia River Crossing planning when residents of the island were actively invited to participate in the process. This new IBR project has shunned Hayden Island residents and not connected at all. Yes, the Public Engagement calendar shows they have visited here 7 times in five years but most residents are in the dark and very suspect of the project. We don't trust the numbers, the theories, and the conclusions. Hayden Island will be severely impacted by construction, noise, vibration, and air pollution. There is loss of property value, loss of business, loss of employment. It is hard to find one good thing about this project! Let's get back to the billboard ... this bridge project seems "old" before it is even built. There is a lack of forward thinking, future planning, and exciting design. All bridge designs in the DSEIS are dull and boring and not grand enough for this iconic project. Let's start over and do better!,

JCA comment #: 399

IBR Draft SEIS - RECORD #2011 DETAIL

First Name :	Alexander
Last Name :	Bloch
Attachments :	DSEIS-2011_Bloch_Original.pdf (6 kb)

IBR Draft SEIS - RECORD #2011 DETAIL

Submission Date : 11/15/2024
First Name : Alexander
Last Name : Bloch
Business/Organization/Agency :

Submission Input :

First Name:
Alexander

Last Name:
Bloch

[redacted]

[redacted]

[redacted]

[redacted]

Topic Area:
Induced Demand

Comment:
The EIS assumes that reducing car idling will reduce emissions. That's plain wrong, since more cars using the bridge will create more emissions. The EIS must be rewritten to correct this error

JCA comment #: 398

IBR Draft SEIS - RECORD #2012 DETAIL

First Name :	Alexander
Last Name :	Bloch
Attachments :	DSEIS-2012_Bloch_Original.pdf (6 kb)

IBR Draft SEIS - RECORD #2012 DETAIL

Submission Date : 11/15/2024
First Name : Alexander
Last Name : Bloch
Business/Organization/Agency :

Submission Input :

First Name:
Alexander

Last Name:
Bloch

[redacted]

[redacted]

[redacted]

[redacted]

Topic Area:
Other

Comment:
I'll keep this one short, but I truly don't understand why this project needs to be so expensive. I understand that construction costs are high, but the current plan would be one of the most expensive infrastructure projects in history. But for what? Just to reduce the time it takes to get from Clark County to downtown Portland? The bridge isn't even the real bottleneck, that's the part of I-5 that goes through a heavily residential neighborhood. Once the IBR is built the only way to relive the resulting congestion will be to demolish hundreds of homes and further divide low income communities.

JCA comment #: 397

IBR Draft SEIS - RECORD #2013 DETAIL

First Name :	Alexander
Last Name :	Bloch
Attachments :	DSEIS-2013_Bloch_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #2013 DETAIL

Submission Date : 11/15/2024
First Name : Alexander
Last Name : Bloch
Business/Organization/Agency :

Submission Input :

First Name:
Alexander

Last Name:
Bloch

[redacted]

[redacted]

[redacted]

[redacted]

Topic Area:
Transportation

Comment:
I think that the IBR should consider the impact of tolling in it's traffic modelling. The current modeling doesn't take tolling into account as it predicts a massive and unrealistic increase in car trips over the next few decades, but studies (that I am not allowed to link to) show that using tolling to manage demand is one of the most effective ways to reduce traffic. Since the bridge is going to be tolled anyway as a way to fund construction, I think that the IBR should seriously consider it's impacts in traffic reduction. The current plan is to build the most expensive infrastructure project in Oregon's history by making a unnecessarily wide bridge. I think it's worth a shot to do a pilot tolling program on our current bridge to see how much it improves traffic. I think the results would be promising enough that we can reduce the width of the bridge and save a couple billion dollars

JCA comment #: 396

IBR Draft SEIS - RECORD #2014 DETAIL

First Name :	Alexander
Last Name :	Bloch
Attachments :	DSEIS-2014_Bloch_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #2014 DETAIL

Submission Date : 11/15/2024
First Name : Alexander
Last Name : Bloch
Business/Organization/Agency :

Submission Input :

First Name:
Alexander

Last Name:
Bloch

[redacted]

[redacted]

[redacted]

[redacted]

Topic Area:
Transportation

Comment:
I think the current plan treats active transportation user as an afterthought and needs to be reworked. While car users can go straight from downtown portland to downtown Vancouver, active transportation users have to go up a up a 100ft tall spiral and then navigate confusing and dangerous roads to get to the Vancouver / Williams corridor. I think the IBR should consider how it connects to the primary north south artery that active transportation users use.
In addition, I think that the bike path should be next to the light rail path. This will provide a buffer from traffic, allow easy access to the light rail stations on the way, and allow active transportation users to take an elevator if they are unable to navigate the 100ft spiral.

JCA comment #: 395

IBR Draft SEIS - RECORD #2015 DETAIL

First Name :	Noel
Last Name :	Bergren-Dizon
Attachments :	DSEIS-2015_Bergren-Dizon_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #2015 DETAIL

Submission Date : 11/15/2024
First Name : Noel
Last Name : Bergren-Dizon
Business/Organization/Agency :

Submission Input :

First Name:
Noel

Last Name:
Bergren-Dizon

[redacted]

[redacted]

[redacted]

[redacted]

Topic Area:
Transportation

Comment:
If the interstate bridge replacement is going to be as massive as planned, please ensure the following:
1) that the cycling/pedestrian path is adjacent to the light rail, so that passengers can get on bikes/scooters/etc. directly from the train.
2) that the cycling/pedestrian path remains elevated the way to the last transit station at Evergreen. No Vancouver dip!
3) that the cycling/pedestrian path is shaded it's entire length so that it's usable during the summer months.
Thx for listening!
-Noel B-D

JCA comment #: 394

IBR Draft SEIS - RECORD #2016 DETAIL

First Name :	Alexander
Last Name :	Bloch
Attachments :	DSEIS-2016_Bloch_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #2016 DETAIL

Submission Date : 11/15/2024
First Name : Alexander
Last Name : Bloch
Business/Organization/Agency :

Submission Input :

First Name:
Alexander

Last Name:
Bloch

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

Topic Area:
Transportation

Comment:
I think that the IBR should take into account the demand modelling in the Marshall report. The projections used in the EIS don't correctly model the actual increase in car traffic. The Marshall report shows that demand does not increase nearly as much as projected and that the IBR as planned is vastly over built compared to what demand is actually warranted

JCA comment #: 393

IBR Draft SEIS - RECORD #2017 DETAIL

First Name :	Mathias
Last Name :	Quackenbush
Attachments :	DSEIS-2017_Quackenbush_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #2017 DETAIL

Submission Date : 11/15/2024
First Name : Mathias
Last Name : Quackenbush
Business/Organization/Agency :

Submission Input :

First Name:
Mathias

Last Name:
Quackenbush

[redacted]

[redacted]

[redacted]

[redacted]

Topic Area:
Transportation

Comment:
Dear IBR leaders,

As somebody who was raised in Vancouver and now lives in Portland, I have a major stake in this project. As it stands now, the severity of traffic on both bridges is such that it's all but impossible to visit family on weeknights after work. With the current limits of public transit capacity including lack of rail or dedicated bus lanes, even those of us like me who want to avoid contributing to traffic by travelling via transit are restricted to the very slow pace of traffic, not to mention the time wasted by unnecessary bus transfers. For this reason, I am very excited about the planned additions of active transportation and transit infrastructure to the proposed new bridge!

Because of the documented phenomenon of Induced Demand, adding more freeway lanes and interchanges, as currently proposed, is a non-solution that not only dramatically inflate the cost of the project to taxpayers, but also will impose serious burdens in terms of air quality and bulldozed neighborhood (with associated loss of tax base) on both sides of the river, with likely very minimal if any benefit. This is not even to speak of the inappropriateness of encouraging so much additional driving while the impacts of climate emergency are manifesting all around us. For this reason, I am asking that you rightsize the IBR project, retaining public transit and active transportation infrastructure while scaling back the currently-obscene number of proposed additional lanes and freeway interchanges. Let's focus our resources on building a good bridge that helps people get across the river and prepares us for future transit expansions, including making sure there is capacity for four-car trains, heavy rail, and multiple Bus Rapid Transit lanes.

In order to maximize usability of the bridge for pedestrians and transit-riders, I would also ask that the design position transit lanes between single-occupancy vehicle lanes and the multi-use pathway to provide a buffer for safety. Here on the Oregon side, I hope the bridge includes easy connections to the Wiliams-Vancouver bike corridor. Above all, I hope the transit lanes/stations are easily and safely accessible from the multi-use pathway. We have the opportunity to lay the groundwork for a healthier, safer, and more climate-resilient way of crossing the Columbia. Please, be on the right side of history!

JCA comment #: 392

IBR Draft SEIS - RECORD #2018 DETAIL

First Name :	Robin
Last Name :	May
Attachments :	DSEIS-2018_May_Original.pdf (6 kb)

IBR Draft SEIS - RECORD #2018 DETAIL

Submission Date : 11/15/2024
First Name : Robin
Last Name : May
Business/Organization/Agency :

Submission Input :

First Name:
Robin

Last Name:
May

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

Topic Area:
Transportation

Comment:
Just build a bridge!! We have been delaying on this long enough. Time for pubic comment is over, build the damn bridge.

JCA comment #: 391

IBR Draft SEIS - RECORD #2019 DETAIL

First Name :	Dan
Last Name :	McFarling
Attachments :	DSEIS-2019_McFarling_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #2019 DETAIL

Submission Date : 11/15/2024
First Name : Dan
Last Name : McFarling
Business/Organization/Agency :

Submission Input :

First Name:
Dan

Last Name:
McFarling

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

Topic Area:
Transportation

Comment:
I OPPOSE the proposed IBR, a 1950s response to a 21st Century problem.
On June 7, 2006, a Memorandum from CRC Engineering Team stated "In the process of developing the River Crossing (RC) components and packaging them with the Roadway components, it has become apparent that those RC components that include a low-level moveable span should be removed from further consideration and not be included in alternative packaging … Movable spans are more costly in both initial and maintenance

and operations when compared to a fixed span."

This bad decision resulted in ODOT pursuing a costly, seemingly endless, almost comical (and impossible) effort to design a bridge high enough to comply with federal waterway navigation law, and an amazing series of gymnastic attempts to avoid conflict with aircraft approaching and departing the Pearson airfield. That effort failed. The proposed IBR does NOT comply.

When I and others met with District 13 US Coast Guard in Seattle more than a decade ago, it was clear that a fixed bridge design could NOT comply with federal waterway navigation law.

Once the June 7, 2006 decision was made, ODOT pushed forward – striving to "protect" the costly investments made in their original plans for a high bridge. Like the "gymnastics" designed to avoid conflict with aircraft, it was almost comical how ODOT attempted to sell their ill-designed project to the public by claiming that "seismic vulnerability" necessitated approval - as they elevated not only the bridge, but also costly rebuilds of I-5 and freeway interchanges to seismically vulnerable heights.

Lowering the bridge, interchanges and I-5 substantially lowers costs, expedites construction, and reduces adverse environmental impacts and seismic vulnerability. The low bridge option, rejected in 2006, would cost a fraction of the current ODOT proposal.

Furthermore, ODOT has never provided truthful analysis of an immersed tunnel option, but distorted and inflated the costs thereof.

We need to request outside consultants who are not beholden to ODOT to give honest consideration to (1) a low bridge option with a moveable span, (2) an immersed tunnel option, and (3) improvements to the existing BNSF railway bridge. Such evaluation needs to consider the how meaningful public transit alternatives and tolling would impact post pandemic, 21st century traffic.

[redacted]

JCA comment #: 390

IBR Draft SEIS - RECORD #2020 DETAIL

First Name :	Jim
Last Name :	Labbe
Attachments :	DSEIS-2020_Labbe_Original.pdf (140 kb) Screenshot-2024-11-14-at-6.41.24?PM.png (184 kb)

IBR Draft SEIS - RECORD #2020 DETAIL

Submission Date : 11/15/2024
First Name : Jim
Last Name : Labbe
Business/Organization/Agency :

Submission Input :

First Name:
Jim

Last Name:
Labbe

Business or Organization:
n/a

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

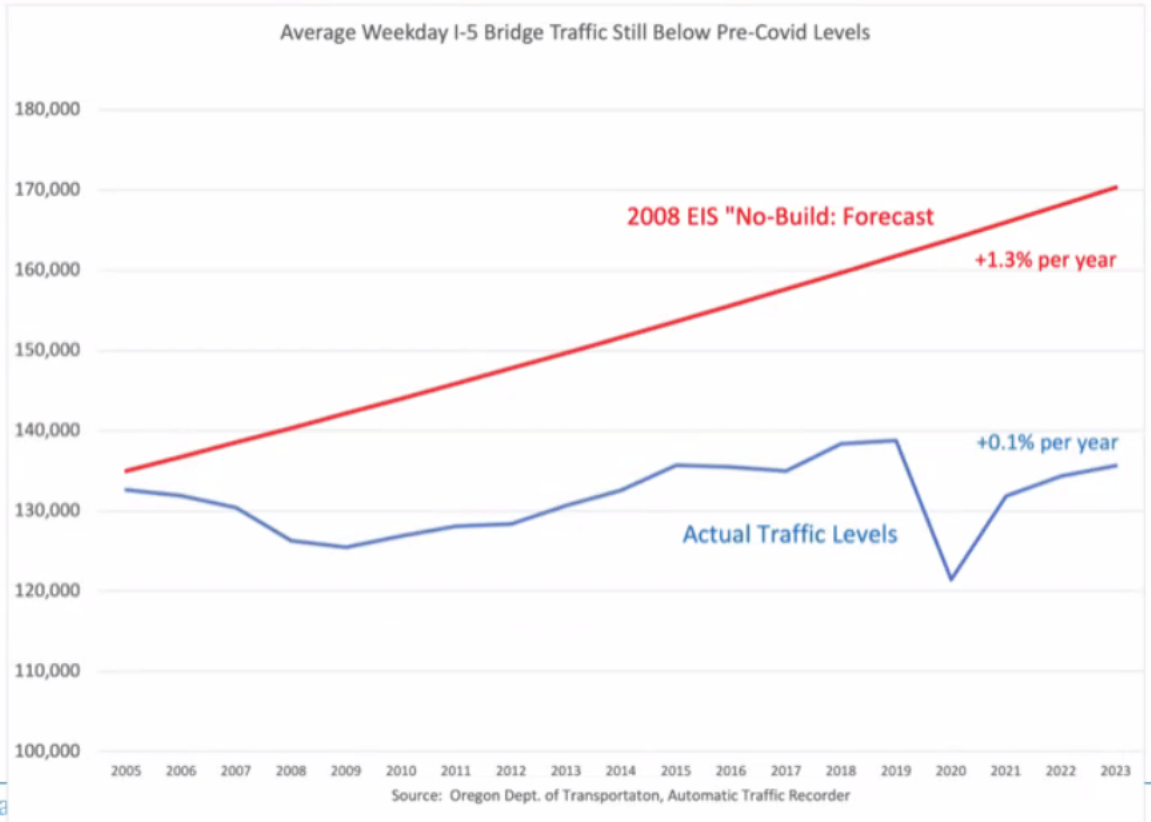
Topic Area:
Other

Comment:
I have seen compelling evidence in the Marshall Report that IBRP staff and engineers have and continue to

overestimate traffic and discount the impacts of induced demand, that you are basically proposing a bridge that will increase SOV trips and create increased congestion over time and space, including new bottlenecks immediately south of the project area. This is simply unacceptable and a colossal waste of limited public resources we need to address the climate crisis and build a more balanced, human scale, transportation system with significant modal share increases for active transportation and transit.

Attachment (maximum one):
Screenshot-2024-11-14-at-6.41.24?PM.png

JCA comment #: 389


Average Weekday I-5 Bridge Traffic Still Below Pre-Covid Levels
180,000
170,000
160,000
150,000
140,000
130,000
120,000
110,000
100,000
2008 EIS "No-Build: Forecast
+1.3% per year
+0.1% per year
Actual Traffic Levels
2005
2006
2007
2008
2009
2010
2011
2012
2013
2014
2015
2016
2017
2018
2019
2020
2021
2022
2023
Source: Oregon Dept. of Transportaton, Automatic Traffic Recorder

IBR Draft SEIS - RECORD #2021 DETAIL

First Name :	Justin
Last Name :	French
Attachments :	DSEIS-2021_French_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #2021 DETAIL

Submission Date : 11/15/2024
First Name : Justin
Last Name : French
Business/Organization/Agency :

Submission Input :

First Name:
Justin

Last Name:
French

[redacted]

[redacted]

[redacted]

[redacted]

Topic Area:
Energy

Comment:
Seems silly that this doesn't have anything for energy creation.
Kinetic plates- that many cars driving over... Use that energy.
Oh look all this wind creates by the traffic as they drive by... Let's follow some of the design principles of China and Japan and put the little wind turbines in between the things. Harness it and feed it to the Portland grid(not companies homes)
Oh look there's all this water that flows underneath the bridge.... Maybe just anchor small turbines into the support columns.
Or the rain water falling from bridge... And all the road gunk goes straight into river...
Why not just catch it off sides like big gutter and later small hydro electric fans and then filters and work your

way down so water falling from sky on project makes a bit of energy and gets filtered.
Oh look wlits windy at the top of the bridge... Maybe put some small and effective turbines on top and
It's unacceptable that in building a bridge this size there aren't any mentions of it generating energy for city.
Like how many of those gods awful-way to intense and bright lights are gonna be needed for this project... How are those getting energy?

Like this project is too old school, too much like every other city.
Portland has an opportunity to raise the bar with this project.
We can have the world look to us as an example of integrated innovation..... Or we can dump a bunch of money into the illthought out project only to have to do it again . And again and again.

JCA comment #: 388

IBR Draft SEIS - RECORD #2022 DETAIL

First Name :	Jim
Last Name :	Labbe
Attachments :	DSEIS-2022_Labbe_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #2022 DETAIL

Submission Date : 11/15/2024
First Name : Jim
Last Name : Labbe
Business/Organization/Agency :

Submission Input :

First Name:
Jim

Last Name:
Labbe

Business or Organization:
n/a

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

Topic Area:
Other

Comment:
This project needs to consider the exurban environmental impacts in Clark County as it will absolutely increase

development pressures on farm and forest lands since people will, at least temporarily, be able to commute from farther away. It is not enough to dismiss this concern by saying all land-use plans already factor in a new bridge. This bridge will increase development pressures and result in to lower density sprawl.

JCA comment #: 387

IBR Draft SEIS - RECORD #2023 DETAIL

First Name :	Tirilee
Last Name :	Cassel
Attachments :	DSEIS-2023_Cassel_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #2023 DETAIL

Submission Date : 11/15/2024
First Name : Tirilee
Last Name : Cassel
Business/Organization/Agency :

Submission Input :

First Name:
Tirilee

Last Name:
Cassel

[redacted]

[redacted]

[redacted]

[redacted]

Topic Area:
Air Quality

Comment:
As a nursing student, I've learned how air pollution from cars poses serious risks to our health. Emissions and particulate matter from tires contribute to asthma, heart disease, and even certain cancers. Expanding car infrastructure might seem like a solution to traffic, but in reality, it only encourages more cars on the road, worsening air quality and increasing these health risks, especially for communities living nearby. Instead of expanding highways, investing in cleaner public transportation and infrastructure that promotes walking, cycling, and accessibility for people with disabilities could help reduce pollution and improve community health. Help us nurses help our communities by building a bridge for better health outcomes. Adding car lanes will only cause harm to us and future generations. We can improve the health of communities by making active transportation more accessible for everyone, so let's ditch the idea of extra car lanes and build a better future.

JCA comment #: 386

IBR Draft SEIS - RECORD #2024 DETAIL

First Name :	Justin
Last Name :	French
Attachments :	DSEIS-2024_French_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #2024 DETAIL

Submission Date : 11/15/2024
First Name : Justin
Last Name : French
Business/Organization/Agency :

Submission Input :

First Name:
Justin

Last Name:
French

[redacted]

[redacted]

[redacted]

[redacted]

Topic Area:
Visual Quality

Comment:
This new bridge design is UGLY and inefficient.
The same amount of space could be utilized in a more elegant and ecologically conscious ways.
Why are you trying to make Portland, a haven city for artists and weirdos look like a bland block.
What happened to the flow and grace of architecture. Like whoever has been voting on these designs.... Maybe stop because it's bland, and predictable. I could go to any big city and see something just as bland and poorly excited. Maybe it's time to let Portland stand out in being able to pair elegance and function.
It just looks like.... Every other drab city scape.
Do better

JCA comment #: 385

IBR Draft SEIS - RECORD #2025 DETAIL

First Name :	Justin
Last Name :	French
Attachments :	DSEIS-2025_French_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #2025 DETAIL

Submission Date : 11/15/2024
First Name : Justin
Last Name : French
Business/Organization/Agency :

Submission Input :

First Name:
Justin

Last Name:
French

[redacted]

[redacted]

[redacted]

[redacted]

Topic Area:
Transportation

Comment:
Updating the bridge and corridor is important, and the design focuses to much on the cars and not enough on pedestrians and public transit systems.
The design looks like it's just going to make navigating in the city a NIGHTMARE while they build it and then even worse when they open it creating giant bottlenecks on either side.
Gross.
We don't need an expansion like this. Don't be like Dallas or Boston. Both of those places suck to drive through because of the dumb highway designs.
You would do better to look at designs from any of the college kids that actually live here.
Seems like this is a really poor design choice for the longevity of the city and the ease of gransportation

JCA comment #: 384

IBR Draft SEIS - RECORD #2026 DETAIL

First Name :	Tirilee
Last Name :	Cassel
Attachments :	DSEIS-2026_Cassel_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #2026 DETAIL

Submission Date : 11/15/2024
First Name : Tirilee
Last Name : Cassel
Business/Organization/Agency :

Submission Input :

First Name:
Tirilee

Last Name:
Cassel

[redacted]

[redacted]

[redacted]

[redacted]

Topic Area:
Neighborhoods and Equity

Comment:
Prioritizing expanding car infrastructure instead of multi-modal active transportation for this project will do more harm to the communities it aims to serve. I5 already has a racist history of displacing families and businesses in the Albina neighborhood in the 1950s. This area deserves relief from the damage that car infrastructure has inflicted, not more traffic and pollution through the neighborhood. The only way to remedy this is by prioritizing an equitable transportation system for all users. Not everyone has the physical or financial means to own and operate a motor vehicle, but everyone has the right to safely utilize the infrastructure we will spend hundreds of millions of dollars on. Please do not perpetuate the damage already done by constructing this freeway by expanding the car lanes while not prioritizing all other means of transportation. Design is for people, not cars!

JCA comment #: 383

IBR Draft SEIS - RECORD #2027 DETAIL

First Name :	Tegan
Last Name :	Valo
Attachments :	DSEIS-2027_Valo_Original.pdf (9 kb)

IBR Draft SEIS - RECORD #2027 DETAIL

Submission Date :	11/15/2024
First Name :	Tegan
Last Name :	Valo
Business/Organization/Agency :	B-Line Urban Delivery
Attachments :	DSEIS-2027_Valo_Original.pdf (8 kb)

Submission Input :

First Name:
Tegan

Last Name:
Valo

Business or Organization:
B-Line Urban Delivery

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
My name is Tegan Valo and I'm writing on behalf of B-Line Urban Delivery. We are a local cycle logistics company that specializes in reducing VMT by replacing truck trips with our fleet of electric trikes and bikes. In 2023 alone, we eliminated 334,614 miles of travel that would have otherwise been done on trucks and vans without our services. We believe that there are far better ways to reduce congestion than expanding vehicle capacity, which will only result in lanes filling up due to induced demand. The improvements to active transportation and the extension of light rail are appreciated, but we believe the resources going into expansion of lane capacity would be better spent elsewhere. Making the active transportation and public transportation facilities truly world class should be our top priority to reflect the progressive goals of our region. We know from decades of research that investing in those alternatives is the only way to lastingly alleviate congestion, and we can do so while keeping the budget far more manageable than with the project's current bloated scope. Any temporary improvements to mobility through the project area will only run into a congestion bottleneck further south anyways.

In particular, all new light rail facilities should be future-proofed for capacity by being compatible with four-car trains and future higher-order transit like heavy rail should be considered in the planning. Active transportation paths should be minimize out-of-direction travel and overly strenuous climbs, and feature easy and convenient connections to popular corridors such as N Williams/Vancouver.

B-Line knows from first-hand experience that with a little creativity and bravery, there are better ways to reduce VMT and create a more livable and pleasant community than adding more lanes. Thank you for your consideration.

JCA comment #: 382

IBR Draft SEIS - RECORD #2028 DETAIL

First Name :	Jack
Last Name :	Peasley-Lynch
Attachments :	DSEIS-2028_Peasley-Lynch_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #2028 DETAIL

Submission Date : 11/15/2024
First Name : Jack
Last Name : Peasley-Lynch
Business/Organization/Agency :

Submission Input :

First Name:
Jack

Last Name:
Peasley-Lynch

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

Topic Area:
Transportation

Comment:
The IBR's use to both transit riders and cyclists - and ESPECIALLY to those who, like I do, use a bike to make up for long distances between transit stops and destinations - will be severely degraded if the multi-use pathway and MAX tracks are on opposite sides of the bridge, and far more if the MAX stations and bike path are as high up in the air as they are currently planned to be. Access to Vancouver will be improved hugely by the changes recommended by the Just Crossing Alliance, and I implore Metro, ODOT, the cities of Portland

and Vancouver, and all other stakeholders to be as forward-thinking as those who ensured the 205 would include a bike path and busway decades ago.

JCA comment #: 381

IBR Draft SEIS - RECORD #2029 DETAIL

First Name :	Hugh
Last Name :	Donkin
Attachments :	DSEIS-2029_Donkin_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #2029 DETAIL

Submission Date : 11/15/2024
First Name : Hugh
Last Name : Donkin
Business/Organization/Agency :

Submission Input :

First Name:
Hugh

Last Name:
Donkin

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

Topic Area:
Transportation

Comment:
The bridge needs to be replaced, but it's disheartening to invest in something that increases car traffic and chokes out neighborhoods adjacent to the highway. We should have something that expands our rail and transit lines.

I live between I5 and the 43 and my neighborhood is dangerous because of highway traffic! I would love to see

this traffic reduced and the highways reduced or removed.

JCA comment #: 380

IBR Draft SEIS - RECORD #2030 DETAIL

First Name :	Ricky
Last Name :	Lind
Attachments :	DSEIS-2030_Lind_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2030 DETAIL

Submission Date :	11/15/2024
First Name :	Ricky
Last Name :	Lind
Business/Organization/Agency :	

Submission Input :

I'm 80 years old and can say this; I moved out of Portland during to the mismanagement of the city's funds. Lightrail was and is a failure of a project. It breeds crime in southeast Portland and we don't need it nor do we want it in Washington. Thr bridge needs 5 lanes and NO LIGHTRAIL. Or go the cheaper route and build a third bridge over by Washougal that connects to I84.

IBR Draft SEIS - RECORD #2031 DETAIL

First Name :	Jerry
Last Name :	Gordon
Attachments :	DSEIS-2031_Gordon_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2031 DETAIL

Submission Date :	11/15/2024
First Name :	Jerry
Last Name :	Gordon
Business/Organization/Agency :	

Submission Input :

Considering current traffic levels and what the future looks like between Portland and Vancouver it seems imperative that the new bridge design includes rail transportation between the two cities thus helping to reduce vehicle traffic.

IBR Draft SEIS - RECORD #2032 DETAIL

First Name :	Steven
Last Name :	Chen
Attachments :	DSEIS-2032_Chen_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2032 DETAIL

Submission Date :	11/15/2024
First Name :	Steven
Last Name :	Chen
Business/Organization/Agency :	

Submission Input :

Just wanted to voice my support for this project and the inclusion of light rail and improvements to public transit. While I believe tolls and other use taxes disproportionately impact lower income people, I also understand the bridge needs to be paid for somehow. Thank you for your work on this critical project!

IBR Draft SEIS - RECORD #2033 DETAIL

First Name :	Anna
Last Name :	DeFries
Attachments :	DSEIS-2033_DeFries_Original.pdf (4 kb)

IBR Draft SEIS - RECORD #2033 DETAIL

Submission Date : 11/15/2024
First Name : Anna
Last Name : DeFries
Business/Organization/Agency :

Submission Input :

As a society, we need to make our public transport better, for less of a reliance on cars in favor of higher density transit. We need to support thoughtful and efficient public transportation throughout the consideration of this bridge.

With the construction of this new bridge, we need to also make the bridge useful for those not driving. Currently, busses are treated as cars, why would anyone chose to ride them, other than the price of owning a car? They would not. At a minimum, we must have a bus on shoulder lane, where busses can go at least almost full speed or potentially a bus/HOV lane. The light rail connection to Vancouver, widening of the pedestrian and bike path, and bus on shoulder should be priorities in the building of this bridge. With better bus and light rail connection, the number of cars going across the bridge can be drastically reduced.

I support tolling the bridge, but it is also important that there is reasonable public transportation as an alternative to the toll. We want to encourage the use of high density transportation and as a way to avoid the toll.

A fixed span bridge is the only ideal case for transportation and the ONLY good option. It is unacceptable for all traffic, including light rail and buses, to be halted just for a ship to pass under the bridge. A movable span bridge is inefficient in terms of both time and cost, and it also requires significant maintenance. We need to build the bridge for the long term benefits, rather than a couple of large ships that rather seldom come by.

If a commercial ship of height greater than 116ft needs to get through, the company can move smaller amounts of freight on multiple ships at a higher cost to them. The military should also use smaller ships to get through or have procedures to remove antennas to get under the bridge. Though, if this is the most important matter, I would recommend that Pearson airport be closed or air traffic being directed differently to not have issues with the bridge.

If the Pearson airport is causing a height limitation, then it should be greatly considered that is stop all non-necessary, non-emergency traffic. For a small airport on a major interstate that is the main artery between North and South to stop a bridge from being built to a certain height for non-commerce use is terrible, no matter the historical significance. Private flights are special that only few can have and should not be considered for the masses. The bridge must be priority.

Bikes and pedestrians should be separated or at least delineated for safety of both groups.

One auxiliary in optimal. The most optimal road additions are adding the auxiliary lane to the bridge. All other roads just expand the mess of traffic. I DO NOT support 2 auxilary lanes at all. Two add very little return in terms of congestion relief, but add much required extra road maintenance, and overall cost, as well as expanding a highway, where the public transport should be top priority. Having fewer roads is much more

pleasant than during Portland and Vancouver into Los Angeles.

I do not support adding or expanding interchanges, especially ones that uproot businesses.

Widening lanes should be avoided. The lane width should be consistent with the speed limit rather than arbitrarily widened. Widening lanes makes travel more dangerous, as it encourages people to exceed the speed limit. The extra space only makes it easier and more comfortable for them to do so. Wider lanes also mean that there is more road to maintain, thus costs more.

I do not understand the implications of the C street ramps, so I cannot comment on it further.

For the new light rail stations in Vancouver, we should make sure that the stations are friendly for people walking or biking to the station, rather than just people driving to the station. Consider how pedestrians walking to the station interact with traffic, ensuring that they are not put at risk by cars. Make the station a welcome addition to the community, rather than just looming and ugly.

Rather than one park-and-ride per station, we should have one park and ride for the new stations. Though if that is not possible, we should still be choosing park-and-ride locations that are joint-use. We should try to reduce the number of park-and-rides and encourage better connections to the stations that do not require a car. One way to do this would be to connect current and new bike infrastructure to light rail stations. Additionally, we should improve biking and walking connections between businesses and light rail stations to make them more pleasant (increase visual quality), safe, and accessible, thereby encouraging greater use of light rail. Park and ride 1a seems acceptable as it does not have a footprint on current land, just over the interstate.

As technologies change over the years, make sure light rails and trains can be upgraded as needed in the future. At minimum, consider full automation, different train cars, frequency of service, and maximum speed. Think about what space would be required and implications if provisions were not made now. Would concrete need to be drilled? Could the concrete be drilled because of bridge implications? Leave extra space for this new technology in the plan, so it can be implemented in the future.

Figure 3.7-2 (p. 399) that shows some trails are “permanently effected.” We should keep as many trails as possible. The text seems to suggest that the trails will be realigned, which I hope is the case.

IBR Draft SEIS - RECORD #2034 DETAIL

First Name :	Ole
Last Name :	Helgerson
Attachments :	DSEIS-2034_Helgerson_Original.pdf (2 kb)

IBR Draft SEIS - RECORD #2034 DETAIL

Submission Date :	11/15/2024
First Name :	Ole
Last Name :	Helgerson
Business/Organization/Agency :	reitred

Submission Input :

Second submission. The first contained a http address. I was informed that it thus would not be accepted. The following revised comments are based on knowledge from a review analysis (Just Crossing Alliance: IBR Insights website). I have concluded that the draft EIS is significantly flawed in that it will create more social and economic cost than is necessary.

#Future traffic use is overestimated compared to actual use. Therefore; use more accurate estimates to minimize construction and social costs.
#The Rose quarter appears to be the N-S traffic bottle neck, not the Columbia crossing. Therefore: Focus on that bottleneck first.
The fact that increasing road capacity, e.g. adding extra lanes, leads to more traffic, same traffic densities and the samey-same bottle necks is not addressed. Therefore: Focus on non-construction ways of managing traffic
#Displacement (destruction) of homes and businesses is not presented forthrightly. Therefore: Be absolutely honest and up front in describing potential destruction and displacement of dwellings and other structures and the related economic costs.
#No reason given for the very long on ramp in Vancouver. Describe the rationale for this portion of the project including destruction of dwellings and other structures.
#The bridge design is not clear, a lift bridge would appear to be the best alternative. Therefore: present alternative designs in a table showing their positives and negatives viz air, river and land-based traffic.
#Full effects on aquatic biota do not seem to be adequately presented. Therefore: Present science base neutral assessments of effects of fish and other river biota.

I understand and agree with the seismic need to replace the existing bridge. I offer that could be lowered by adapting a design with a smaller foot print (lessened loss of existing homes and businesses, lessened carbon cost) which would serve future traffic needs and provide all-round energy and cost savings.

Recommendation: before proceeding, redo the analysis with more realistic data.

End of report. OTH

IBR Draft SEIS - RECORD #2035 DETAIL

First Name :	Brett
Last Name :	Setterfield
Attachments :	DSEIS-2035_Setterfield_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2035 DETAIL

Submission Date :	11/15/2024
First Name :	Brett
Last Name :	Setterfield
Business/Organization/Agency :	

Submission Input :

Make the bike/pedestrian facilities on the same side of the bridge as the MAX. Making that multimodal experience as seamless as possible is crucial. Plus, that huge spiral ramp is going to be a barrier for many people, when they could use the proposed elevator.

IBR Draft SEIS - RECORD #2036 DETAIL

First Name :	Scott
Last Name :	Johnson
Attachments :	DSEIS-2036_Johnson_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2036 DETAIL

Submission Date : 11/15/2024

First Name : Scott

Last Name : Johnson

Business/Organization/Agency :

Submission Input :

I do not support the initiative. Replacing a 6 lane bridge with a six lane bridge makes little sense unless viewed as a way to force light rail across the river to Vancouver. Also, the plan will not address the "Spill over" to MLK and interstate and those streets are largely accessed after the Columbia Blvd. exit. Your transit ridership assumptions are overstated. Even a 50% increase to current levels would barely result in pre 2020 levels. But the biggest issue is that if enacted, this bridge replacement will only move the "choke point" to the I5/405 intersection that already sees substantial traffic delays and accidents.

IBR Draft SEIS - RECORD #2037 DETAIL

First Name :	Edward
Last Name :	Gill
Attachments :	DSEIS-2037_Gill_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2037 DETAIL

Submission Date : 11/15/2024

First Name : Edward

Last Name : Gill

Business/Organization/Agency :

Submission Input :

I support either fixed bridge options (please avoid any lifts). I fully support the inclusion and extension of High Speed Transit rail to Vancouver to allow for future mobility options. I frequently cycle over the existing bridge, and recognize the need for full pedestrian / cycling paths thru the corridor. Cycling across bridge to Delta Park should be off-street protected, and without crossing traffic. Thanks.

IBR Draft SEIS - RECORD #2038 DETAIL

First Name :	Abby
Last Name :	Griffith
Attachments :	DSEIS-2038_Griffith_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2038 DETAIL

Submission Date :	11/15/2024
First Name :	Abby
Last Name :	Griffith
Business/Organization/Agency :	

Submission Input :

I strongly support the construction of a new interstate bridge with a designated transportation line. We should prioritize increasing transit actions including buses and light rail. As a disabled person who relies on public transportation, I often travel from Portland to Vancouver to visit family and go to doctors, and accessible transit would significantly improve my mobility and allow me to get around faster. This new bridge should be double-deck, which will benefit our community including individuals with disabilities, seniors, young people, and those who choose not to drive, to get around easier.

IBR Draft SEIS - RECORD #2039 DETAIL

First Name :	Karen
Last Name :	Dahl
Attachments :	DSEIS-2039_Dahl_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2039 DETAIL

Submission Date :	11/15/2024
First Name :	Karen
Last Name :	Dahl
Business/Organization/Agency :	

Submission Input :

I'm requesting an extension of the comment period--please keep the SEIS comment period open until March 1st. Thank you

IBR Draft SEIS - RECORD #2040 DETAIL

First Name :	John
Last Name :	Bilderback
Attachments :	DSEIS_2040_Bilderback_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2040 DETAIL

Submission Date : 11/15/2024

First Name : John

Last Name : Bilderback

Business/Organization/Agency :

Submission Input :

The real price tag is loosing jobs to Oregon. I suggest that the City, county and State of Washington , command that jobs be added here in the Vancouver area and forget those the commute concept. The real issue is that people commute to their jobs in Oregon.

Providing busses is foolish! people want the convince of their automobiles. Local buses, with ridership at an abysmal 4 to 5% level , a commuter train a capital investment that is out of reach. Better to bring business here and forgo the attempts to remove the people from their cars.

I believe the plan as stated is to expensive. Build a I-205 compliment bridge and make it 8 lanes for cars, not bicycles not trains and no busses.

IBR Draft SEIS - RECORD #2041 DETAIL

First Name :	J
Last Name :	T
Attachments :	DSEIS_2041_T_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2041 DETAIL

Submission Date : 11/15/2024

First Name : J

Last Name : T

Business/Organization/Agency :

Submission Input :

Upgrading a main transportation route to current seismic regulations is extremely important as is upgrading to current ADA regulations. It isn't clear whether current standards and regulations are adequate and whether the project is looking ahead to implement and use standards above the current minimums so that we are really planning for a long term solution.

IBR Draft SEIS - RECORD #2042 DETAIL

First Name :	Colleen
Last Name :	Bonin
Attachments :	DSEIS_2042_Bonin_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2042 DETAIL

Submission Date : 11/15/2024
First Name : Colleen
Last Name : Bonin
Business/Organization/Agency :

Submission Input :

I want a larger bridge to accommodate the huge volume of trucks and cars.
Tolls would be an unfair burden on commuters and limited-income seniors who have to cross the river for medical appointments. In an ideal world, a bypass PDX section could be a toll road option for through traffic.
I also support the inclusion of light rail and think the fear of PDX people coming via train to steal from Clark County is ridiculous.
Please reach out to more rural communities for education sessions and provision for questions and to allay fears.

IBR Draft SEIS - RECORD #2043 DETAIL

First Name :	Reuven
Last Name :	Jankovsky
Attachments :	DSEIS_2043_Jankovsky_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2043 DETAIL

Submission Date :	11/15/2024
First Name :	Reuven
Last Name :	Jankovsky
Business/Organization/Agency :	

Submission Input :

Light Rail has never turned a profit in any USA city please do not bring that Tax drain to curse our city.

IBR Draft SEIS - RECORD #2044 DETAIL

First Name :	Edward
Last Name :	Flynn
Attachments :	DSEIS_2044_Flynn_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2044 DETAIL

Submission Date :	11/15/2024
First Name :	Edward
Last Name :	Flynn
Business/Organization/Agency :	

Submission Input :

I think that whatever we do with the bridge , The funding needs to be fast-tracked and secured before the trump administration guts the funding for the project.

IBR Draft SEIS - RECORD #2045 DETAIL

First Name :	N/A
Last Name :	N/A
Attachments :	DSEIS_2045_NA_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2045 DETAIL

Submission Date :	11/15/2024
First Name :	N/A
Last Name :	N/A
Business/Organization/Agency :	

Submission Input :

I do not see that the option of demolishing and not replacing the bridge at all, and re-routing I-5 to the I-205 corridor, has been seriously considered. The light rail stations are poorly located and I do not see an option which maintains or reduces the current number of lanes on the bridge, which will increase traffic in my neighborhood.

IBR Draft SEIS - RECORD #2046 DETAIL

First Name :	Jeff
Last Name :	Kessenich
Attachments :	DSEIS_2046_Kessenich_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2046 DETAIL

Submission Date :	11/15/2024
First Name :	Jeff
Last Name :	Kessenich
Business/Organization/Agency :	na

Submission Input :

I strongly appose tolling and think the federal government isn't contributing sufficiently for a project the serves the entire west coast, from the Mexican border to the Canadian border.
I don't see the immediate need for light rail expansion. Eventually, yes. But it is so limited to the area in Vancouver served it is too much money to spend now.
I believe the design should include light rail, but the actual construction of the rail and infrastructure should be postponed to later years, and after additional federal money is found to support the construction. This would greatly reduce the need for tolling in the short term and also reduce the short-term construction impact on Vancouver.

IBR Draft SEIS - RECORD #2047 DETAIL

First Name :	andrey
Last Name :	nikolayev
Attachments :	DSEIS_2047_Nikolayev_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2047 DETAIL

Submission Date : 11/15/2024

First Name : andrey

Last Name : nikolayev

Business/Organization/Agency :

Submission Input :

please build with plan for future 100-yr growth locally and internationally. I feel 6 lanes are needed on south bound and 6 on north bound directions. Maybe look at Los Angeles infrastructure as example. If you build 4 lanes, which 1 lane more than existing than it is too little in short time. I like Marquam bridge in Portland - it is minimalistic in asthetics but functional in terms of using same footprint for both south/north directions. Yesterday it took me 2 hours to get from Portland downtown to Hazel Dell. 11/15/2024

IBR Draft SEIS - RECORD #2048 DETAIL

First Name :	Chris
Last Name :	Rasmussen
Attachments :	DSEIS_2048_Rasmussen_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2048 DETAIL

Submission Date :	11/15/2024
First Name :	Chris
Last Name :	Rasmussen
Business/Organization/Agency :	

Submission Input :

I seems to me if we are studying the environmental impact of a new crossing then tearing it down and replacing it is a destructive impact. We should be adding a crossing option for the Columbia River not deleting an option. A tunnel under Hayden Island, the river, downtown Vancouver coming up near SR500 would be an economical alternative and relieve traffic congestion and speed through vehicles.

IBR Draft SEIS - RECORD #2049 DETAIL

First Name :	Brody
Last Name :	Sargent
Attachments :	DSEIS_2049_Sargent_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2049 DETAIL

Submission Date :	11/15/2024
First Name :	Brody
Last Name :	Sargent
Business/Organization/Agency :	

Submission Input :

As a Vancouver resident and frequent I would not like to see an expensive freeway expansion that would endanger the charm of the Vancouver Waterfront. I would rather the project remain smaller focusing on a safe earthquake resident bridge and addition of multimedia transit options such as light rail.
I believe that induced demand for more vehicles will not help my commute but more transit options and income adjusted tolling will.

IBR Draft SEIS - RECORD #2050 DETAIL

First Name :	Todd
Last Name :	Bachmann
Attachments :	DSEIS_2050_Bachmann_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2050 DETAIL

Submission Date :	11/15/2024
First Name :	Todd
Last Name :	Bachmann
Business/Organization/Agency :	

Submission Input :

I've noticed in your models the multimodal bicycle and pedestrian lane design has pretty much one access point on the Washington side and one on the Oregon side. If you compare it to the car access to the highway, it's a huge difference with way more number of opportunities to for cards to access the crossing. Have you explored designing more access points for bicyclists and pedestrian to access the multimodal other than one entry point? It seems like that option would could add less dramatic climbs in addition to the current 3 turn roundabout on ramp in downtown Vancouver. And also help connect better to mass transit and make it more likely for people to take the pathway across the river.

IBR Draft SEIS - RECORD #2051 DETAIL

First Name :	Joe
Last Name :	Wilks
Attachments :	DSEIS_2051_Wilks_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2051 DETAIL

Submission Date :	11/15/2024
First Name :	Joe
Last Name :	Wilks
Business/Organization/Agency :	

Submission Input :

My recommendation is no light rail. It’s costs among other things out weigh the benefits

IBR Draft SEIS - RECORD #2052 DETAIL

First Name :	Rob
Last Name :	Reynolds
Attachments :	DSEIS_2052_Reynolds_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2052 DETAIL

Submission Date :	11/15/2024
First Name :	Rob
Last Name :	Reynolds
Business/Organization/Agency :	

Submission Input :

5 lanes each way. No light rail, no tolls.

IBR Draft SEIS - RECORD #2053 DETAIL

First Name :	Alice
Last Name :	Winczer
Attachments :	DSEIS_2053_Winczer_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2053 DETAIL

Submission Date :	11/15/2024
First Name :	Alice
Last Name :	Winczer
Business/Organization/Agency :	Winczer

Submission Input :

I am totally in favor of this I-5 bridge replacement plan.

IBR Draft SEIS - RECORD #2054 DETAIL

First Name :	Andy
Last Name :	Coffman
Attachments :	DSEIS_2054_Coffman_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2054 DETAIL

Submission Date :	11/15/2024
First Name :	Andy
Last Name :	Coffman
Business/Organization/Agency :	

Submission Input :

Build it. I honestly don't care what it is. You have an unimaginably fragile bridge that is going to fall into the water and cripple the region when it does. It is unconscionable that you have a drawbridge on an interstate. This thing is horse-and-buggy tech.

Vancouver: Stop fighting about "the crime train". Get some damn adults in the room and fix this.

IBR Draft SEIS - RECORD #2055 DETAIL

First Name :	Dashia
Last Name :	Kinsey Bey
Attachments :	DSEIS_2055_KinseyBey_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2055 DETAIL

Submission Date :	11/15/2024
First Name :	Dashia
Last Name :	Kinsey Bey
Business/Organization/Agency :	

Submission Input :

being able to receive this info via email would be more helpful than the chat.

IBR Draft SEIS - RECORD #2056 DETAIL

First Name :	Cassandra
Last Name :	Muilenburg
Attachments :	DSEIS_2056_Muilenburg_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2056 DETAIL

Submission Date :	11/15/2024
First Name :	Cassandra
Last Name :	Muilenburg
Business/Organization/Agency :	

Submission Input :

I live in the Eliot neighborhood, and I have seen and heard the legacy this freeway has had on the destruction and displacement of so many families. I do not believe there is a legitimate need to expand the freeway, and I enthusiastically support capping the freeway and reconnecting the neighborhood as the federal dollars are intended. Additionally, I believe that ODOT should honor their intentions of assigning this work of capping the freeway to minority contractors. There are many in the community that share this perspective.

IBR Draft SEIS - RECORD #2057 DETAIL

First Name :	Floranda
Last Name :	Berglund
Attachments :	DSEIS_2057_Berglund_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2057 DETAIL

Submission Date :	11/15/2024
First Name :	Floranda
Last Name :	Berglund
Business/Organization/Agency :	

Submission Input :

I travel to Washington state from Portland Oregon for work purposes and for personal reasons. It's important to improve the bridge to reduce travel time, if light rail can br provided to help with barriers to those who use public transportation

IBR Draft SEIS - RECORD #2058 DETAIL

First Name :	Honor
Last Name :	Jackson
Attachments :	DSEIS_2058_Jackson_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2058 DETAIL

Submission Date :	11/15/2024
First Name :	Honor
Last Name :	Jackson
Business/Organization/Agency :	

Submission Input :

I am excited about this project because I am a lifelong Portlander and spent about 4 years living in Vancouver so I would often daily use this bridge in my commute. Today, I use this bridge about 3 or 4 times a month on the weekends or in the evenings and often experience high traffic no matter the time of day. My concern or question is whether or not 4 lanes on each side of the bridge will be enough -- could we consider adding a 5th? I am thinking about the long-term growth of the PDX area as well as Vancouver and the new waterfront and I think adding a 5th lane on each side could help with the congestion of this bridge now and into the future. Also, I love the idea of adding the light rail and walking options to the bridge through each design. I greatly appreciate this forum to provide my input on this project -- thank you!

IBR Draft SEIS - RECORD #2059 DETAIL

First Name :	Dianna
Last Name :	Edenfield
Attachments :	DSEIS_2059_Edenfield_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2059 DETAIL

Submission Date :	11/15/2024
First Name :	Dianna
Last Name :	Edenfield
Business/Organization/Agency :	

Submission Input :

I believe all of the bridges need to be replaced and upgraded to be safe for everyone that travels and potential environmental hazards, including earthquake safe. I like the design of the 2nd bridge, one wide bridge going across with the light rail on the sides. I think that would carry alot more vehicles which would improve travel time. However, I think a double decker bridge is safer which eliminates head on collisions. I also like the double decker design as it doesn't cover as much as the river. We need to have our rivers getting light and air from the sky, not be covered by concrete and automobiles.

IBR Draft SEIS - RECORD #2060 DETAIL

First Name :	Adam
Last Name :	Caba
Attachments :	DSEIS_2060_Caba_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2060 DETAIL

Submission Date : 11/15/2024
First Name : Adam
Last Name : Caba
Business/Organization/Agency :

Submission Input :

I would like to see the single level finback design versus the opening bridge as a bridge that opens will stop traffic and also have increased potential for mechanical failures.
I would also encourage some environmental impact study due the fact there was a flood there many years ago that wiped out some indigenous people and there may be some issues with disturbing the land there,

IBR Draft SEIS - RECORD #2061 DETAIL

First Name :	Sydney
Last Name :	Sarachman
Attachments :	DSEIS_2061_Sarachman_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2061 DETAIL

Submission Date :	11/15/2024
First Name :	Sydney
Last Name :	Sarachman
Business/Organization/Agency :	OR

Submission Input :

I do not agree with the environmental impact this would cause. This plan should not move forward with the current environmental impact that's expected.

IBR Draft SEIS - RECORD #2062 DETAIL

First Name :	Emma
Last Name :	Share
Attachments :	DSEIS_2062_Share_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2062 DETAIL

Submission Date :	11/15/2024
First Name :	Emma
Last Name :	Share
Business/Organization/Agency :	

Submission Input :

Two car lanes in each direction, maximum! Keep it thin and close to ground level! Make the MAX stops and bus/rapid transit lanes at the same grade so they share lanes! Make the bike on-ramps sensible, accessible to the transit stops, and not so damn steep!

Don't contribute to the ongoing environmental torching of the planet and our region by kissing automobility's ass! Stop the vehicular madness! Road diet now! No more freeway expansions!

IBR Draft SEIS - RECORD #2063 DETAIL

First Name :	Chris
Last Name :	Vita
Attachments :	DSEIS_2063_Vita_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2063 DETAIL

Submission Date :	11/15/2024
First Name :	Chris
Last Name :	Vita
Business/Organization/Agency :	

Submission Input :

The proposed expansion of the bridge should prioritize sustainable transportation options rather than increasing the number of lanes. Research consistently shows that widening highways often leads to induced demand, where additional lanes encourage more driving, ultimately exacerbating congestion and pollution rather than alleviating it.

Instead, we should focus on equitable access to public transit and safe bike lanes. Investing in these alternatives will not only reduce traffic but also support climate goals, improve public health, and provide more affordable transportation options. Let’s seize this opportunity to design infrastructure that serves the needs of our future, not just our cars.

IBR Draft SEIS - RECORD #2064 DETAIL

First Name :	Zoran
Last Name :	Sekulic
Attachments :	DSEIS_2064_Sekulic_Original.pdf (2 kb)

IBR Draft SEIS - RECORD #2064 DETAIL

Submission Date : 11/15/2024
First Name : Zoran
Last Name : Sekulic
Business/Organization/Agency :

Submission Input :

Sorry if I mention anything you have already heard many times before.

I have read too many objectives, seen too many stakeholders and not enough priorities. This drives your design complexity, review complexity, time to completion, risk and cost. And of course, that makes environmental impact review more difficult.

The Portland Metro area needs a bridge that will reduce congestion and be earthquake resistant. The listed objectives seem confused. How can in “Purpose and Need” 1.3.1 b) public transportation be listed right after 1.3.1.a) traffic operations? 1.3.1 d) seismic stability is listed last. The seismic stability should have been listed as a strong second.

The analysis should have considered building a bridge with just one additional lane in each direction and good earthquake resistance. That’s it! No more, no less. Build it simpler and everything becomes easier.

Therefore the analysis should review the justification for the light rail. Take a good look at the WES line between Beaverton and Wilsonville. It runs almost empty all the time. Compare the projected traffic used to justify that light rail vs. real traffic today. MAX traffic is not growing. It is not a good solution for commuters because the vast majority still have to drive their cars to the MAX parking lots. That is what I had to do.

The analysis should also review the justification for the bicycle lanes. It is not just the lanes on the bridge, it is all the bicycle facilities and all the bicycle lanes on all the connections to the bridge.

I had many trips through Seattle and was impressed how they can change direction of some I-5 lanes north of the city. More lanes into the city in the morning and more lanes out of the city in the late afternoon. The analysis should consider such a feature as a significant benefit for any single bridge alternative.

One way to review the emphasis in the discussion is to perform a simple word search of some key words. In the “IBR Draft SEIS Chapter 2 – Description of Alternatives” there are 126 mentions of MAX, light rail and train, 73 mentions of bus, 8 mentions of trucks and 2 mentions of autos and cars. Does this sound like a balanced review of the alternatives for an Interstate Bridge? It was not!

The cost estimates for the bridge are very high. If you make it simpler it will be less expensive and it will be built quicker.

In conclusion, make the bridge with true Interstate Highway objectives. The traffic will move faster and the environmental impact will be much smaller and more predictable.

Than you for your considerations,

Zoran

IBR Draft SEIS - RECORD #2065 DETAIL

First Name :	Tyler
Last Name :	Sanders
Attachments :	DSEIS_2065_Sanders_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2065 DETAIL

Submission Date :	11/15/2024
First Name :	Tyler
Last Name :	Sanders
Business/Organization/Agency :	

Submission Input :

Transit should absolutely be the number one priority, as 1 car lane worth of transit has the ability to move an order of magnitude more people than the entire rest of the bridge, HEAVILY alleviating traffic from Vancouver to Portland.

The transit and biking provisions need to also be bundled together so people can easily make the bike to transit connection easily with this bridge

IBR Draft SEIS - RECORD #2066 DETAIL

First Name :	Ero
Last Name :	Gray
Attachments :	DSEIS_2066_Gray_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2066 DETAIL

Submission Date :	11/15/2024
First Name :	Ero
Last Name :	Gray
Business/Organization/Agency :	

Submission Input :

I’m very opposed to enabling more automobile traffic. Adding lanes will hurt us all in the long run. Let’s focus on transit and ped/bike use instead.

IBR Draft SEIS - RECORD #2067 DETAIL

First Name :	Vanessa
Last Name :	White
Attachments :	DSEIS_2067_White_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2067 DETAIL

Submission Date :	11/15/2024
First Name :	Vanessa
Last Name :	White
Business/Organization/Agency :	Just V Natural LLC

Submission Input :

I am wondering 1. how will cargo and Navy ships pass through if the bridge structure is as low as pictured. and 2nd, how will the bridge construction provide equality to undeserved and marginalized communities.

IBR Draft SEIS - RECORD #2068 DETAIL

First Name :	Jamie
Last Name :	Keiser
Attachments :	DSEIS_2068_Keiser_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2068 DETAIL

Submission Date :	11/15/2024
First Name :	Jamie
Last Name :	Keiser
Business/Organization/Agency :	

Submission Input :

I do not support any bridge that is 3 lanes as it will not solve the congestion issues. You have a chance to do something to improve traffic yet are not. 4 lanes each way is a must!!!!

IBR Draft SEIS - RECORD #2069 DETAIL

First Name :	Samuel
Last Name :	Yerke
Attachments :	DSEIS_2069_Yerke_Original.pdf (3 kb)

IBR Draft SEIS - RECORD #2069 DETAIL

Submission Date : 11/15/2024
First Name : Samuel
Last Name : Yerke
Business/Organization/Agency :

Submission Input :

I do not support the proposed solution for our bridge.

I commute across the bridge multiple times weekly for work. I do not believe the plan proposed represents the most fiscally, socially or environmentally prudent solution. ODOT in the process has been misleading with their modeling and use of data, making false projections about future automobile and trucking growth on the corridor.

The plan proposed aims to continue funneling billions of dollars into a strategy of induced demand, proven globally to be a waste. ODOT is acting irresponsibly as the stewards of many generations mobility.

The Just Alliances' views of right sizing the project and prioritizing active forms of transportation must be considered once this failed project is picked back up.

Here's to hoping all the people working hard on this project under their foolish leaders get the support they need to make our region a better place for everyone, not just drivers.

IBR Draft SEIS - RECORD #2070 DETAIL

First Name :	Gary
Last Name :	Lee
Attachments :	DSEIS_2070_Lee_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2070 DETAIL

Submission Date : 11/15/2024
First Name : Gary
Last Name : Lee
Business/Organization/Agency :

Submission Input :

I say no to this proposal.

The draft provided does not represent the future of mobility we need for this region!

We need to prioritize active transportation, transit over single occupancy automobiles.

The environmental impact is downplayed and modeling numbers for cars and trucks falsified to support ODOTs false claims about need for more lanes.

G

IBR Draft SEIS - RECORD #2071 DETAIL

First Name :	Gareth
Last Name :	Nevitt
Attachments :	DSEIS_2071_Nevitt_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2071 DETAIL

Submission Date :	11/15/2024
First Name :	Gareth
Last Name :	Nevitt
Business/Organization/Agency :	

Submission Input :

The bridge needs to include mass transit, especially light rail. Vancouver is a dormitory town for Portland and people need a clean, cheap, frequent way to commute from all parts of Vancouver to downtown Portland. There is no point in building a new bridge if it doesn't enable and encourage as many people as possible to use it in as many ways as possible.

IBR Draft SEIS - RECORD #2072 DETAIL

First Name :	Katelyn
Last Name :	Manning
Attachments :	DSEIS_2072_Manning_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2072 DETAIL

Submission Date :	11/16/2024
First Name :	Katelyn
Last Name :	Manning
Business/Organization/Agency :	

Submission Input :

No to a new bridge, especially if there is going to be a toll! We pay enough in taxes and other fees! If those don’t cover it then maybe a better look at the budget and see where cuts can be made rather than increasing the cost on the working class. My husband drives over the bridge for work and I can’t imagine having to constantly pay a toll just to get to and from work! This will have a negative impact on families. Not to mention that this doesn’t even improve the traffic in that area.

IBR Draft SEIS - RECORD #2073 DETAIL

First Name :	Katelyn
Last Name :	Carroll
Attachments :	DSEIS_2073_Carroll_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2073 DETAIL

Submission Date :	11/16/2024
First Name :	Katelyn
Last Name :	Carroll
Business/Organization/Agency :	

Submission Input :

I like the idea of expanding the yellow line and creating a better bridge.
However, I don't typically like toll bridges/roads because they are often confusing. If I want to go for a hike in Washington, then I don't want to be charged wild fees because I didn't understand which lane to drive in or I didn't download some bridge specific app ahead of time. Also, if friends and family are visiting from out of town, they don't know this bridge has a toll and they will get a ticket in the mail.

IBR Draft SEIS - RECORD #2074 DETAIL

First Name :	Dennis
Last Name :	Anderson
Attachments :	DSEIS_2074_Anderson_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2074 DETAIL

Submission Date :	11/16/2024
First Name :	Dennis
Last Name :	Anderson
Business/Organization/Agency :	LtCol USAF (ret) Captain Southwest Airlines (ret)

Submission Input :

No!!!!!!!

No tolls!!!!!!

NO LIGHT Rail How many times have you heard us say this

Build another bridge NOW!!!! Let the U.S. government fund the entire project.

All you do is put taxpayer dollars into the hands of special interest pockets!!!! $200 million plus dollars already into the project and NOTHING!!!!

Your present solution does NOTHING to solve the gridlock problem.

IBR Draft SEIS - RECORD #2075 DETAIL

First Name :	Lars
Last Name :	Petticord
Attachments :	DSEIS_2075_Petticord_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2075 DETAIL

Submission Date :	11/16/2024
First Name :	Lars
Last Name :	Petticord
Business/Organization/Agency :	11626 NE Everett St

Submission Input :

Please prioritize rail, light rail, cycling and pedestrian traffic to reduce fossil fuel demand

IBR Draft SEIS - RECORD #2076 DETAIL

First Name :	clark
Last Name :	caffall
Attachments :	DSEIS_2076_Caffall_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2076 DETAIL

Submission Date :	11/16/2024
First Name :	clark
Last Name :	caffall
Business/Organization/Agency :	combined forestry & marine services inc

Submission Input :

My comments originate with over 55 years of commercial navigational experience on the Columbia and Willamette Rivers. A fixed bridge option as proposed in the alternative designs would have a significant negative impact on commercial water transit operations. The Marine Transportation Industry has relied on the existing 178 foot lift span clearance since construction of the current bridge. Many times throughout my career, I have relied on that available vertical clearance for safe transit of the cargoes that I have been moving. Other Marine transportation providers with whom I have spoken have similar concerns pertaining to a fixed span alternative. There are ongoing discussions relative to marine transportation projects that would require vertical clearances greater than allowed in the proposed fixed span alternatives. The inability of these projects to move forward due to the limitation of safe marine transportation access could have a significant local negative economic impact. The bottom line is that marine transportation has worked with and depended on the current 178 foot vertical clearance. That standard needs to be maintained.

IBR Draft SEIS - RECORD #2077 DETAIL

First Name :	Erin Leigh
Last Name :	Zimman
Attachments :	DSEIS_2077_Zimman_Original.pdf (4 kb)

IBR Draft SEIS - RECORD #2077 DETAIL

Submission Date :	11/16/2024
First Name :	Erin Leigh
Last Name :	Zimman
Business/Organization/Agency :	

Submission Input :

The bike and pedestrian plan must be improved for both convenience to and from Vancouver as well as safety. Public transit modes need to closely connect. You can add every auxiliary lane you like but the reason why traffic is bad now is because drivers are breaking the law. Single-use vehicles are using the carpool lane with impunity and those coming from MLK are taking an illegal right turn to enter the I-5 ramp despite ample signage. Any plan must expand access to non-drivers and hold driver accountable with traffic cameras etc.

IBR Draft SEIS - RECORD #2078 DETAIL

First Name :	Peter
Last Name :	Boag
Attachments :	DSEIS_2078_Boag_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2078 DETAIL

Submission Date : 11/16/2024

First Name : Peter

Last Name : Boag

Business/Organization/Agency :

Submission Input :

I understand how "controversial" this bridge is, but this is the time to think about the future rather than bury ourselves in the past and present. I very much hope the bridge provides for mass transit. I am all in favor of light-rail and a more direct connection between Vancouver and Portland. It is such a pain to have to drive to Portland to catch Max. Sure, I do take the express bus from Vancouver to Portland, but light-rail would make this so much simpler. I also ride a bike and often cross the bridge with it now (which can be very annoying given the current configuration). I would love to see better access for bikes and pedestrians.

IBR Draft SEIS - RECORD #2079 DETAIL

First Name :	Fae
Last Name :	Whittin
Attachments :	DSEIS_2079_Whittin_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2079 DETAIL

Submission Date : 11/16/2024
First Name : Fae
Last Name : Whittin
Business/Organization/Agency :

Submission Input :

I think the current plan for the I5 bridge extension will waste resources on a bridge we don't actually need and won't fulfill local or regional transit goals.

The current plan states that road traffic is expected to increase by 35%, if that happens it means the region has failed it's climate goals. We should be focusing on smaller bridges designed to handle local traffic. If there were more small bridges that focused on multi-modal transit, I think it would reduce congestion on I5, allowing freight to move more freely while encouraging locals to use other modes (biking, walking, transit etc) when they need to cross. Recognizing the difference between local traffic between Portland and Vancouver and freight will be core to designing a bridge that can fulfill everyone's needs.

I hope the commission considers scrapping these plans before it costs Oregonians and Washingtonians more money and more wasted tax dollars on infrastructure that will not meet our needs. We need climate resilient and flexible transit infrastructure, this project is just continuing the same policies that have led us to our current problems. Please don't just add another lane, change your philosophy towards transportation.

IBR Draft SEIS - RECORD #2080 DETAIL

First Name :	Marc
Last Name :	Eddings
Attachments :	DSEIS_2080_Eddings_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2080 DETAIL

Submission Date :	11/16/2024
First Name :	Marc
Last Name :	Eddings
Business/Organization/Agency :	

Submission Input :

The bike lane and transit lines should be connected, not separated by a significant distance.

IBR Draft SEIS - RECORD #2081 DETAIL

First Name :	Hanna
Last Name :	Grishkevich
Attachments :	DSEIS_2081_Grishkevich_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2081 DETAIL

Submission Date :	11/16/2024
First Name :	Hanna
Last Name :	Grishkevich
Business/Organization/Agency :	

Submission Input :

There must be a study how many people actually use light rail/bus on this bridge for this bridge to be successful and serve its purpose- reduce congestion.

IBR Draft SEIS - RECORD #2082 DETAIL

First Name :	irina
Last Name :	briksa
Attachments :	DSEIS_2082_Briksa_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2082 DETAIL

Submission Date :	11/16/2024
First Name :	irina
Last Name :	briksa
Business/Organization/Agency :	

Submission Input :

Preferably bridge will be wide enough to avoid big traffic. Ideally with one specific lane for semi-trucks.

IBR Draft SEIS - RECORD #2083 DETAIL

First Name :	Oksana
Last Name :	Bell
Attachments :	DSEIS_2083_Bell_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2083 DETAIL

Submission Date :	11/16/2024
First Name :	Oksana
Last Name :	Bell
Business/Organization/Agency :	

Submission Input :

The bridge has to be safe for a pedestrian. Also, we need a bicycle line to be separated from pedestrian!

IBR Draft SEIS - RECORD #2084 DETAIL

First Name :	jANE
Last Name :	lANGE
Attachments :	DSEIS_2084_Lange_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2084 DETAIL

Submission Date : 11/16/2024

First Name : jANE

Last Name : lANGE

Business/Organization/Agency :

Submission Input :

very disappointed that you are putting all this money into a bridge primarily for cars. Please think about better bike lanes (that don't suddenly vanish at a scary junction!) and pedestrian access throughout the trimet area. I would like to cycle more but I'm afraid because there are so many big vehicles, and drivers don't give me enough space and don't seem to pay attention.

IBR Draft SEIS - RECORD #2085 DETAIL

First Name :	Svitlana
Last Name :	Shershun
Attachments :	DSEIS-2085_Shershun_Original.pdf (19 kb)

IBR Draft SEIS - RECORD #2085 DETAIL

Submission Date :	11/16/2024
First Name :	Svitlana
Last Name :	Shershun
Business/Organization/Agency :	

Submission Input :

Гибкость и ценовая категория. Больше удобств для граждан.

[English translation] Flexibility and price range. More amenities for citizens.

IBR Draft SEIS - RECORD #2086 DETAIL

First Name :	Nataliia
Last Name :	Eremina
Attachments :	DSEIS-2086_Eremina_Original.pdf (21 kb)

IBR Draft SEIS - RECORD #2086 DETAIL

Submission Date :	11/16/2024
First Name :	Nataliia
Last Name :	Eremina
Business/Organization/Agency :	

Submission Input :

Любые улучшения для уменьшения пробок . Сделать платный мост для тех кто заезжает с других штатов.

[English translation] Any improvements to reduce traffic congestion. Make a toll bridge for those coming in from other states.

IBR Draft SEIS - RECORD #2087 DETAIL

First Name :	randall
Last Name :	Friesen
Attachments :	DSEIS-2087_Friesen_Original.pdf (3 kb)

IBR Draft SEIS - RECORD #2087 DETAIL

Submission Date :	11/16/2024
First Name :	randall
Last Name :	Friesen
Business/Organization/Agency :	Columbia Pacific Building & Construction Trades Council

Submission Input :

SEIS Advisory Board Members,

I am writing to you today on behalf of over 20,000 Building Trades Union members in the Portland Metro and SW Washington areas, represented by The Columbia Pacific Building and Construction Trades Council (CPBCTC). The CPBCTC is comprised of 22 local area unions, 3 District Councils of Unions, and 14 International Union Organizations.

Building Trades Union members are the foundation of the construction industry in the region, building the schools, hospitals, and infrastructure that our communities rely on. We are committed to upholding the highest standards of workmanship, safety, fairness, and training opportunities.

The Interstate Bridge Replacement (IBR) is a critical infrastructure proposal that will trigger positive environmental change to all communities in the region. The new bridge will reduce greenhouse gas emissions along I-5 by improving traffic flow, easing congestion, and potentially enabling transit-oriented development. This will lead to lower fuel consumption and fewer vehicle emissions.

Additionally, the new bridge will particularly benefit the next generation of construction professionals who are currently middle school students. With an approximate 10-year timeframe, this project could and will employ thousands of workers and has the possibility and responsibility of providing family-wage jobs and unparalleled training opportunities through Building Trades State Registered Apprenticeship Programs. Over the past several years, State Registered Apprenticeship Programs have made concerted efforts to increase awareness to traditionally underserved communities, increasing opportunities for generational wealth and expanding the middle class. Access to these programs will provide a new base of workers with cutting edge skills related to green energy, giving further environmental benefits to the region.

One of the most effective tools to reach these goals is through collaborative efforts in conjunction with the use of Community Benefit Agreements (CBA) that benefit workers, and minority and women owned businesses that employ those workers. CBA requirements ensure access to family healthcare, family wages and benefits, and high training standards that are committed to safety and quality. Without these agreements there is no assurance all these important community benefits would be met creating a positive environmental impact.

Failing to replace the bridge would harm the communities it serves. Thousands of commuters face daily traffic congestion, impacting their lives and limiting family time.

Lastly, improved transit options will benefit underserved communities by providing better access to jobs, grocery stores, healthcare, and other essential services. Communities most affected by this project should be the ones to benefit the most.

Thank you for your time and consideration,

Randall Friesen
Executive Secretary-Treasurer

Columbia Pacific Building & Construction Trades Council

IBR Draft SEIS - RECORD #2088 DETAIL

First Name :	Ed
Last Name :	Brewer
Attachments :	DSEIS_2088_Brewer_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2088 DETAIL

Submission Date :	11/16/2024
First Name :	Ed
Last Name :	Brewer
Business/Organization/Agency :	

Submission Input :

Moving the crush of cars into Portland is not a solution, as we have previously proven, in many cities. Mass transit, with a hub in Washington, is the only viable long term solution.
A through traffic solution may be useful built to the west from Longview south past the city.

IBR Draft SEIS - RECORD #2089 DETAIL

First Name :	richard
Last Name :	rylander
Attachments :	DSEIS_2089_Rylander_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2089 DETAIL

Submission Date : 11/16/2024
First Name : richard
Last Name : rylander
Business/Organization/Agency :

Submission Input :

You are repeating the same mistakes from the last go round. Some people see the need for bridge replacement but only as part of a larger set of corrections. As pointed out ad nauseum, light rail has no place. Not enough lanes. Lack of traffic improvement on the I-5 corridor through portland. The lack of more bridges to deal with the expanding population. Indeed, the limit to 2 bridges places the populous at extreme risk from terrorist actions as well as natural disasters. Anyone in their right mind can see this. Additional bridges must be the first actions. Finally, the failure of your group to deal with the height requirements (again) shows you have an agenda of moving forward regardless of the facts and wishes of the people. Your group epitomizes the elite portion of our society disconnected from reality.

IBR Draft SEIS - RECORD #2090 DETAIL

First Name :	Jin
Last Name :	Park
Attachments :	DSEIS-2090_Park_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2090 DETAIL

Submission Date :	11/16/2024
First Name :	Jin
Last Name :	Park
Business/Organization/Agency :	

Submission Input :

This zoom session was very helpful to understand what state is planning on the bridge. Thanks!

IBR Draft SEIS - RECORD #2092 DETAIL

First Name :	Diana
Last Name :	Lamb
Attachments :	DSEIS-2092_Lamb_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2092 DETAIL

Submission Date :	11/16/2024
First Name :	Diana
Last Name :	Lamb
Business/Organization/Agency :	

Submission Input :

I would like you guys to make the most environmentally friendly way to build and maintain the bridge. I don't go across the bridge very often, so I just want it to help the planet as much as possible.

IBR Draft SEIS - RECORD #2093 DETAIL

First Name :	Josh
Last Name :	Pinkas
Attachments :	DEIS-2093_Pinkas_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2093 DETAIL

Submission Date :	11/16/2024
First Name :	Josh
Last Name :	Pinkas
Business/Organization/Agency :	

Submission Input :

Good Morning,

I often use the I-5 bridge when traveling to Seattle, Washington. I've noticed that traffic can often be extremely congested and delayed. During peak hours or when incidents occur. One major problem I believe is the lack of a shoulder. When there's an accident or breakdown, there's no space for vehicles to pull over, which can cause massive delays and leave drivers stuck for hours.

IBR Draft SEIS - RECORD #2094 DETAIL

First Name :	Julia
Last Name :	Yang
Attachments :	DSEIS-2094_Yang_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2094 DETAIL

Submission Date :	11/16/2024
First Name :	Julia
Last Name :	Yang
Business/Organization/Agency :	

Submission Input :

I live fairly far away, as I am from Corvallis, but I am interested in moving to the Portland area. I have friends who live in Vancouver, so I would be interested in going back and forth as I like. Reducing travel time is important, but the toll amount is also important. While speed is important, is it worth the toll amount? What is stopping me from taking local routes or taking public transportation instead? I would be interested in making sure that it is worth it to cross the bridge instead of taking alternative routes.

IBR Draft SEIS - RECORD #2095 DETAIL

First Name :	Eva
Last Name :	Hulse
Attachments :	DSEIS-2095_Hulse_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2095 DETAIL

Submission Date :	11/16/2024
First Name :	Eva
Last Name :	Hulse
Business/Organization/Agency :	

Submission Input :

Upgrading the bridge's seismic resilience and mass transit are essential and not without tradeoffs for the people who live and work next to the bridge. Please ensure that the people and businesses that are displaced are fairly compensated not just for property but also for the disruption to their lives, and that they are not left on their own to find new places to live and reopen their businesses.

IBR Draft SEIS - RECORD #2096 DETAIL

First Name :	Ling
Last Name :	Wen
Attachments :	DSEIS-2096_Wen_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2096 DETAIL

Submission Date :	11/16/2024
First Name :	Ling
Last Name :	Wen
Business/Organization/Agency :	

Submission Input :

[- I use the bridge multiple times a week for work. My primary concern is traffic jam and then toll.
- Prefer option #2 (single level, no bridge raise for big boat). Why do we even waste money to study option #1 and option #3 with bridge raise for big boat?
- Minimize the impact on the existing bridge during the construction of the new bridge

IBR Draft SEIS - RECORD #2097 DETAIL

First Name :	Michael
Last Name :	Connor
Attachments :	DSEIS-2097_Connor_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2097 DETAIL

Submission Date : 11/16/2024
First Name : Michael
Last Name : Connor
Business/Organization/Agency :

Submission Input :

Goals of project: light rail, shoulder lanes for buses, reduce the number vehicles..
Tolls on the drivers they want to reduce.
No tolls on light rail or buses. Using our money to bribe people to do what they would not do otherwise. The concept that the transit passengers, who pay for nothing, have privileges that the people who will pay for this have no such privilege.
Light rail drags crime wherever it goes. We do not what that happening on the North side of the river.
The goal is to diminish the drivers.Then how will they pay?
More printed dollars!
Repair Interstellar bridge as necessary.
Build another bridge that won’t have the difficulty for height limits. Simple.

IBR Draft SEIS - RECORD #2098 DETAIL

First Name :	Nonta
Last Name :	Gatitskaya
Attachments :	2098_DSEIS_Gatitskaya_original.pdf (88 kb)

IBR Draft SEIS - RECORD #2098 DETAIL

Submission Date : 11/16/2024
First Name : Nonta
Last Name : Gatitskaya
Business/Organization/Agency:

Submission Input :

Цена очень высока. Но я понимаю, что его нужно заменить. Добавление автобусных линий или легкорельсового транспорта сомнительно. Обычно я не вижу ни одного человека в автобусе, идущем из Портленда в Ванкувер. Любопытно, проводится ли ежедневное исследование, чтобы понять, насколько это необходимо. И если он действительно нужен и уменьшает пробки, то это должно стать приоритетом - удобные автобусные остановки, парковки и т.д.

[English translation]
The cost is very high, but I understand it needs to be replaced. Adding bus lines or light rail is questionable. I usually don’t see anyone on the bus going from Portland to Vancouver. I’m curious if daily studies are conducted to assess its necessity. And if it’s truly needed and reduces traffic congestion, it should become a priority—convenient bus stops, parking, etc.

IBR Draft SEIS - RECORD #2099 DETAIL

First Name :	Dan
Last Name :	Packard
Attachments :	DSEIS-2099_Packard_Original.pdf (2 kb)

IBR Draft SEIS - RECORD #2099 DETAIL

Submission Date : 11/16/2024
First Name : Dan
Last Name : Packard
Business/Organization/Agency :

Submission Input :

I have reviewed what I could of the lengthy Interstate Bridge Draft Environmental Statement and the numerous supplemental statements and videos.

I am concerned how the design of the bridge and thoroughfare impedes easy and non-cumbersome access to pedestrians and bicyclists while drastically expanding motor vehicle lanes and convenience, simultaneously destroying existing businesses, property and greenway sections along the route of the project.

The Interstate Bridge project adds four additional motor vehicle lanes (going from 10 to 14) to I-5 under Evergreen Blvd. in Vancouver, expanding the super wide ribbon of concrete by 28%! This removes more greenery and vegetation adjacent to the downtown Vancouver library and introduces more harmful air pollutants, tire byproducts and intrusive noise into the core of downtown Vancouver and the historic lush and beautiful Fort Vancouver areas.

The awkwardly designed bicycle/pedestrian access ramps in Vancouver and Hayden island spin active transportation users around in circles to reach the soaring height of the bridge pathway and rail stop, 100 feet in elevation, (10 stories tall) on the Vancouver side. This will be the tallest from ground to bridge height bike/ped crossing structure in the United States. The pathway crossing will have huge wind impacts, loud vehicle noise and scorching temperatures from the summer sun with no protective greenery or shading. The design discourages those that choose active transportation modes of walking, running and bicycling to cross the Columbia river.

The wider ribbon of motor vehicles lanes and concrete on Hayden island removes and displaces numerous thriving businesses, increases harmful air and noise pollution for island residents, elevates maintenance costs and contributes to a sad future of heavier congestion throughout the I-5 transportation corridor in Vancouver and Portland.

To those wanting to just get directly south to Portland, the south access bicycle / pedestrian points to North Portland seem to show a circuitous route of veering and detouring east or west. A much more difficult route than the direct line provided for motor vehicle traffic thru the corridor on the Interstate bridge sections.

In summary, the new Interstate Bridge crossing and associated roadway expansion negatively impacts human health and development in the region, expands motor vehicle use, increases noise and air pollution, multiplies construction and maintenance costs, adversely affects climate goals while providing meager advantages to active transportation modes of walking and bicycling.

The project needs to be drastically downsized to reflect accurate declining vehicle usage trends and enhanced for active and light rail users and anyone that lives and functions in the region.

IBR Draft SEIS - RECORD #2100 DETAIL

First Name :	Jeff
Last Name :	Robertson
Attachments :	DSEIS-2100_Robertson_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2100 DETAIL

Submission Date : 11/16/2024

First Name : Jeff

Last Name : Robertson

Business/Organization/Agency :

Submission Input :

After reviewing the Draft SEIS, and being a resident within the impact zone study (in Vancouver), I would like to strongly urge choosing an IBR design plan that does NOT include the "Westward Shift" option. The final plan should be one that creates the smallest impact to the established homes, businesses, and historic properties that make Vancouver what it is today. Too many historic buildings have been lost in Vancouver over the years due to lack of vision and redevelopment by the city, and every effort should be made to save (not displace) those that remain. And in that same vein, a park and ride option that won't displace any homes/businesses should also be the chosen option. So I would like to urge going with Waterfront Site 1 or Evergreen Site 2. Thank you for listening!

IBR Draft SEIS - RECORD #2101 DETAIL

First Name :	Martin
Last Name :	Pagel
Attachments :	DSEIS-2101_Pagel_Original.pdf (2 kb)

IBR Draft SEIS - RECORD #2101 DETAIL

Submission Date : 11/16/2024
First Name : Martin
Last Name : Pagel
Business/Organization/Agency :

Submission Input :

I’m concerned about feasibility of the proposed bridge and how a feasibility study for the ITT was obtained as I still think that a tunnel would be best for the river crossing.
The 3D videos animation is very deceptive as it only provides a bird's eye view which does neither give the public an impression of the enormity of the proposed structure, nor any sense of height. I’m concerned that most cyclists will not be able to scale the bridge, trucks will not be able to safely maneuver the curving crossing up and down a steep bridge in adverse weather and the transit stations will be very high in the air making access time-consuming.
The IBR funded an ITT study by WSP which Greg Johnson used to work at and who is considered as the main contractor for the bridge. That’s a blatant conflict of interest. The initial study had to be revised after excavation needs were vastly (double!) overstated after public outcry. The IBR published the revised 2023 version with revised estimates, but IBR still published and refers to the conclusion and cost estimates of the original (2021) version, again very deceptive. I believe even the revised estimates are too high as the tunnel could be shallower than proposed. IBR should get a proper study done by independent ITT experts. I’m sure they could optimize the approaches so that most of the existing road infrastructure could be reused rather than have to get rebuilt as proposed for the new bridge. The ITT would require less climbing than the proposed bridge making it a much better option for walking, biking and rolling but you may also consider keeping the existing bridge for walking/cycling.
I also understand that there has been a geotechnical study of the river bed which showed major challenges to drill the shafts. Why has IBR not made those public yet as part of the DEIS process?
Best
Martin Pagel
Seattle resident and transit blogger

IBR Draft SEIS - RECORD #2102 DETAIL

First Name :	Karina
Last Name :	Rutova
Attachments :	DSEIS-2102_Rutova_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2102 DETAIL

Submission Date : 11/16/2024

First Name : Karina

Last Name : Rutova

Business/Organization/Agency :

Submission Input :

To decrease traveling time between Portland and Vancouver all is needed is to widen I-5 in NE Portland area. Specifically between Interstate and Rosa Parks exits and extra lanes there. The bridge probably can be strenthen. Light rail is not needed because it will contribute to destroing homes and overflow of homeless population from Portland. As extra bridge requires extra land and it will destroy houses and businesses in Vancouver. It will affect livability in Vancouver. Toll will disproportionally impacts Washington residents traveling to Portland for work. They already taxed by Oregon without any representation and the toll will increase the burden on us. There are limited job opportunities for SW Washington residents living in Clark County, so many of us work in Portland. This project is too unecessary extensive and we will pay for it.

IBR Draft SEIS - RECORD #2103 DETAIL

First Name :	Holly
Last Name :	Williams
Attachments :	DSEIS-2103_Williams_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2103 DETAIL

Submission Date : 11/16/2024
First Name : Holly
Last Name : Williams
Business/Organization/Agency :

Submission Input :

One Auxiliary Lane Preferred
Living near I5, between Fourth Plain and Mill Plain, I read with interest the information presented on the cost/benefit of a second auxiliary lane. What I can see (or more correctly, surmise) is that the embankment between West Reserve St. and I5 would be removed in order to fit a second auxiliary lane. This embankment hosts a number of good-sized Douglas fir trees which add to sound abatement in the adjacent neighborhood. It is not at all clear how this tree loss is to be mitigated. The additional auxiliary lanes add about 15% more surface and structure to any bridge and roadway. How does the additional concrete, made of GHG producing concrete, and the likely permanent destruction of mature tree, help mitigate negative climate change? The increased width and visual impact of the bridge as it crosses Hayden Island conflicts with all the effort made to reduce the size. The construction cost of the additional lanes is likely to be very significant. And all this for a modelled reduction is congestion time of about 0.5%? (table 3.01-10). The benefits are too small, and the costs are too large.

IBR Draft SEIS - RECORD #2104 DETAIL

First Name :	Steve
Last Name :	Valenta
Attachments :	DSEIS-2104_Valenta_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2104 DETAIL

Submission Date :	11/16/2024
First Name :	Steve
Last Name :	Valenta
Business/Organization/Agency :	Mighty Bowl

Submission Input :

I support the current IBR proposals. Tolls were charged on both bridges at the time of build to help fund it, so why wouldn't we continue that form of funding as well. I support tolling. Roll the Glen Jackson bridge while you're at it to 1) help pay for the replacement of that bridge when the time comes and 2) discourage traffic attempting to avoid the new I-5 tolls.

IBR Draft SEIS - RECORD #2105 DETAIL

First Name :	Anthony
Last Name :	Magrogan
Attachments :	DSEIS-2105_Magrogan_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2105 DETAIL

Submission Date :	11/16/2024
First Name :	Anthony
Last Name :	Magrogan
Business/Organization/Agency :	

Submission Input :

Bike path and transit should be integrated, not separated by 1/2 mile.

IBR Draft SEIS - RECORD #2106 DETAIL

First Name :	Holly
Last Name :	Williams
Attachments :	DSEIS-2106_Williams_Original.pdf (2 kb)

IBR Draft SEIS - RECORD #2106 DETAIL

Submission Date : 11/16/2024
First Name : Holly
Last Name : Williams
Business/Organization/Agency :

Submission Input :

Approach to the Bridge on the Active Transportation Lane is Too Difficult
I5's current sidewalk, although miserable in so many aspects, is at least surprisingly level for a bridge which much clear river traffic. The sidewalk climbs about 25 ft in a distance of a little over 500 ft. (fig. 2-13). Although meeting the letter of the ADA law, I doubt that a wheelchair bound person finds a climb of 25 ft to be easy. The proposed plan increases the climb to well over 100 ft (fig. 2-14; gis.clark.wa.gov) over a distance of nearly a half mile (fig 2-23; gis.clark.wa.gov). This quadrupling of the climb seems to put the bridge out of range for the wheelchair bound – whether pushing oneself or someone else pushing. And it not the ascent only that is troubling. I'm told that trying to slow a wheelchair going down such a descent is terribly difficult and, were control lost, the consequences are dire. This approach design falls short in answering the stated objective of "improved mobility, accessibility, and connectivity, especially for lower income travelers, people with disabilities, …" [App D – p26]
Although grade / elevation changes are acknowledged as a barrier to current usage (App F, sec 3.1, Transportation Technical Report), neither the short trip conversion nor percent ridership inflation methods estimating the increase in active transportation include elevation gain as an explicit (negative) factor. What data exists which can quantify the utility of a replacement route which has both positive and negative features?
I suggest a multipronged approach to maximize the number of people who can access the multi-modal lanes. 1) routing the path, either on the west or the east side of I5, to the community connector at Evergreen Blvd for those who are accessing the bridge via bike or scooter from points north of the Waterfront. 2) Somehow connect the waterfront LRT station with its elevators to the multimodal lane and make sure the elevators are accessible to all users not just C-TRAN/Trimet and/or provide a dedicated elevator (big enough for several bikes) on the east side where the multimodal lane is. The maintenance objections to an elevator have been solved by many jurisdictions around the world. 3) Though the space constraints at the Waterfront are very challenging from a design point of view, a series of zig-zag less steep ramps seem better than a corkscrew, but will make the ascent even longer, thus the need to incorporate all 3 of these ideas (or perhaps just the first 2).

IBR Draft SEIS - RECORD #2107 DETAIL

First Name :	Holly
Last Name :	Williams
Attachments :	DSEIS-2107_Williams_Original.pdf (2 kb)

IBR Draft SEIS - RECORD #2107 DETAIL

Submission Date : 11/16/2024
First Name : Holly
Last Name : Williams
Business/Organization/Agency :

Submission Input :

Width of the Active Transportation Path Neglects Motor-assisted Devices

In looking at the summary of the active transportation improvements, I see that there is no significant change from the plans offered by the CRC ("what's changed" pop-out box, p2-44). The invention and extraordinarily fast adoption of motor assisted wheeled devices (e-bikes, e-scooters, e-motorcycles, hover boards, etc.) has occurred since the CRC's path was developed. The inclusion of another speed regime has dramatic influence on the path's safety. The current proposal is a 25ft total width path (including what appears to be shoulders and center divider structures (p2-29, fig 2-18). Half the path (10 or so feet) is devoted to pedestrians and half to bikes (10 or so feet). My safety concern is that a bicycle climbs a 4-5% grade at well less than 10mph. An e-motorcycle will climb the same grade at better than 20mph – passing the bike. At the same time there can be oncoming descending traffic. It is extremely easy for a traditional bike or e-bike to reach 25-30mph on a 4-5% downslope. At the same time, more cautious riders will descend at something like 10-15mph. There is no level portion of the path. It is either uphill or downhill.

It strikes me that a 10ft wide path can safely handle any two of these four speed regimes. Three at once (e.g. a fast and slow ascender plus a fast descender) does not seem safe – especially when catering to "all ages and abilities" (p 3.01-42). When all four are found together seems a sure recipe for a serious accident. How wide must a path be to handle four lanes (fast, slow up; fast, slow down) of wheeled traffic safely? 10 ft for a pedestrian only lane seems unnecessarily generous (I am both a walker and a e-cyclist) especially if the multimodal lane is on the bottom deck. It will be very loud and not particularly conducive to a long stroll (think Fremont Bridge). That said, given the views of Mt Hood, many folks will want to give it a try!

IBR Draft SEIS - RECORD #2108 DETAIL

First Name :	Kyung
Last Name :	Park
Attachments :	DSEIS-2108_Park_Original.pdf (4 kb)

IBR Draft SEIS - RECORD #2108 DETAIL

Submission Date :	11/16/2024
First Name :	Kyung
Last Name :	Park
Business/Organization/Agency :	BridgeOne Insurance Inc

Submission Input :

I only using bridge when I go to WA. My concern is only traffic.

IBR Draft SEIS - RECORD #2109 DETAIL

First Name :	Jeffrey
Last Name :	Opp
Attachments :	DSEIS-2109_Opp_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2109 DETAIL

Submission Date :	11/16/2024
First Name :	Jeffrey
Last Name :	Opp
Business/Organization/Agency :	

Submission Input :

I strongly support the expansion of light rail and the improvements to active transit. I have lived in San Jose and using the combination of cycling and light rail open a number of doors for Mr because it allowed me to move efficiently throughout the city. Having these modes of transport included in the plan will be a great benefit to our community. The current infrastructure is less than adequate for getting into and out of Portland by bike. The badge has narrow lanes that get choked up by pedestrians. The paths leading to the bridge are interrupted by frequent intersections where you have to be very cautious of vehicle traffic. I’m looking forward to these improvements and a better connection to Portland where I work.

IBR Draft SEIS - RECORD #2110 DETAIL

First Name :	Megan
Last Name :	Eckman
Attachments :	DSEIS-2110_Eckman_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2110 DETAIL

Submission Date :	11/16/2024
First Name :	Megan
Last Name :	Eckman
Business/Organization/Agency :	

Submission Input :

I’m SO excited for this. Having lived in the Bay Area, I’m ready to take the light rail almost from my apartment right into Portland. I am also really looking forward to a safer and easier bike path across the river. I’m constantly shouting for people to step to one side on the bridge and that’s always a danger and a bother. Having easier bike routes will eliminate the tricky intersections on Hayden Island. Can’t wait!!!

IBR Draft SEIS - RECORD #2111 DETAIL

First Name :	Marian
Last Name :	Rhys
Attachments :	DSEIS-2111_Rhys_Original.pdf (9 kb)

IBR Draft SEIS - RECORD #2111 DETAIL

Submission Date :	11/16/2024
First Name :	Marian
Last Name :	Rhys
Business/Organization/Agency :	Association of Oregon Rail and Transit Advocates (AORTA)

Submission Input :

In January, 2000, the Oregon and Washington departments of transportation issued a joint report on the Interstate 5 corridor, titled “Portland/Vancouver I-5 Trade Corridor: Freight Feasibility and Needs Assessment.” The “Summary of Findings” in the Executive Summary of that report presented the following major points:

• Interstate 5 is the primary economic lifeline on the West Coast. The most economically significant segment of I-5 in the Portland/Vancouver region is in North Portland and Vancouver, where the freeway intersects with the Columbia River. Here, the interstate provides access to deep-water shipping, up-river barging, and two water-level transcontinental rail lines.

• Interstate 5 is currently the most congested segment of the regional freeway system in the Portland/Vancouver area. Without attention, future congestion in this important transportation corridor threatens the livability and economic promise of the Portland/Vancouver region.

• To maintain the economic competitiveness of the Portland/Vancouver region, and to maintain the high quality of life, this region needs to develop a Strategic Plan for managing demand in the I-5 Trade Corridor and making a balanced set of improvements in the corridor. To keep up with mobility needs in the corridor, there must be highway, transit, and freight and passenger rail improvements, along with demand management. No single strategy will solve the problems in the corridor. There is no silver bullet.

• Improvements in the corridor will be costly and most cannot be funded with existing transportation revenue. It is possible, however, to fund public improvements in the I-5 Trade Corridor with a combination of federal funds, tolling, and state funding from Oregon and Washington.

It is clear to me that the current Interstate Bridge Replacement Program does NOT adequately address these points. In fact, it contradicts the statement “No single strategy will solve the problems in the corridor. There is no silver bullet.” Quite the contrary; the IBR is presented as a silver bullet that will supposedly solve the complex transportation issues in this corridor. It will not.

Rather, what is needed is “to develop a Strategic Plan for managing demand … and making a balanced set of improvements in the corridor. … [T]here must be highway, transit, and freight and passenger rail improvements, along with demand management.” A single high-elevation freeway mega-bridge is not a balanced approach to this problem.

What is needed in this corridor includes improvements for not only private rubber-tire roadway vehicles, but also rail (both freight and passenger) and waterway navigation. Demand management is also a critical part of solving congestion in this corridor—reducing the number of vehicles crossing the river. Finally, greenhouse gas emission reduction has since emerged as a critical issue, further highlighting the need for a balanced approach to improving traffic movement.

Demand management—not even addressed in the current proposal—needs to be a fundamental part of this project. Reducing the number of rubber-tire vehicles traveling through this corridor could free up space for the critical commercial freight traffic so important to the economic vitality of our region. Private automobile traffic could be reduced with an effective public transit system and active transportation facilities. Even the volume of commercial truck traffic could be reduced, by shifting some freight to rail—a much more fuel-efficient and environmentally friendly mode of transportation.

The most egregious omission of the current IBR program is the lack of consideration of two alternative options:
- A lower bridge with a lift span
- An immersed tunnel

In addition to decreasing both the cost and the environmental destruction required by the project, either of these options would immensely improve the seismic safety of the river crossing. A 116-foot-high mega-bridge, on the other hand, would NOT be seismically safe, no matter how sturdily it is built; in fact, it might even be less safe than the current bridge, during an earthquake. It would also present a significant barrier to active transportation travelers, requiring them to negotiate a height equivalent to a six-story building. (It is noteworthy that none of the rendered views of the proposed bridge has shown a close-up from below, as viewed by a pedestrian, wheelchair user or bicyclist.)

Furthermore, improvements to the railroad bridge just downstream from the current I-5 bridge could reduce the number of lifts required for the highway bridge by ninety percent, by replacing the swing span in that bridge with a lift span closer to the center of the river. Such an improvement would benefit both highway bridge users and waterway traffic, and at a much lower cost than the proposed mega-bridge.

Even though the railroad bridge is privately owned by BNSF Railroad, it also functions as a public good, and a serious effort should be made, to negotiate with the bridge owner; public money is available for such improvements.

In short, the current IBR proposal (whose very name broadcasts the message that it focuses on only one small part of the transportation challenges in this corridor) is, to say the least, incomplete. This is a grave disservice to taxpayers, who must fund this project, to the commercial shippers who rely on this connection for their livelihoods, and to all travelers through this corridor.

I strongly urge the planners to take a broader look at this project, as our two states' departments of transportation did in 2000, and come back with a plan that is lower cost and less destructive to the physical and social environments, and that actually solves the problems with the current configuration. Our region, and future generations, deserve no less.

Marian Rhys, North Portland resident
[redacted]
[redacted]

IBR Draft SEIS - RECORD #2112 DETAIL

First Name :	Amy
Last Name :	Daileda
Attachments :	DSEIS-2112_Daileda_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2112 DETAIL

Submission Date :	11/16/2024
First Name :	Amy
Last Name :	Daileda
Business/Organization/Agency :	

Submission Input :

Hi, my main concerns are the environmental impacts, including air quality. I would want this project to have the least environmental impacts as possible, including with the materials used. Adding bike lanes, transit lanes and carpooling lanes/times would be great. Please do all you can to keep the air quality good as well. Can you add native plant landscaping around the bases of either side of the bridge plus around any associated parking lots? Also some art would be fabulous. Thank you.

IBR Draft SEIS - RECORD #2113 DETAIL

First Name :	Dan
Last Name :	Flores
Attachments :	DSEIS-2113_Flores_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2113 DETAIL

Submission Date :	11/16/2024
First Name :	Dan
Last Name :	Flores
Business/Organization/Agency :	retired

Submission Input :

the voter,s in Clark County voted light rail down every time it was on the ballet we voted it down. cause we don't want it!!! we will vote it down every time!!!!

IBR Draft SEIS - RECORD #2114 DETAIL

First Name :	Holly
Last Name :	McGuire
Attachments :	DSEIS-2114_McGuire_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2114 DETAIL

Submission Date :	11/16/2024
First Name :	Holly
Last Name :	McGuire
Business/Organization/Agency :	

Submission Input :

I support moving forward with the stacked LPA with two auxiliary lanes. it appears to offer the most benefits with only slightly higher impact. I appreciate the detailed and relatively accessible chart of impacts.

IBR Draft SEIS - RECORD #2115 DETAIL

First Name :	Paul
Last Name :	Sochacki
Attachments :	DSEIS-2115_Sochacki_Original.pdf (2 kb)

IBR Draft SEIS - RECORD #2115 DETAIL

Submission Date : 11/16/2024
First Name : Paul
Last Name : Sochacki
Business/Organization/Agency :

Submission Input :

As someone who often travels to Portland, as well as a former Vancouver-to-Portland transit and bike commuter for nearly 10 years, I'm excited to finally see a replacement for the I-5 bridge going forward.

In particular, I want to express my interest and approval in the SR14 Interchange Option B (Draft SEIS transportation technical report, p.870). This would eliminate the highway on-ramp from running through C Street, cutting through what is otherwise projected to be a high active-mobility area (pedestrians, cyclists, scooters, kickboards, etc.), as well as an artery for existing (and planned) mass transit routes. Having a constant stream of idling highway traffic pouring through an area with lots of outdoors dining, coffee shops, etc., is not ideal, either.

Looking at the display of IBR Park and rides (transportation technical report, Figure 1-23, p.61), I would also like to express disapproval of P&R2b -- if this space could better be used as housing, commerce, event area, etc., that would be ideal There will be a massive influx of foot-traffic from the Evergreen Station and Community Connector, so the less P&R space in the downtown the better -- especially in an area that's also going to be seeing more active mobility, as well.

Thank you all for the time spent evaluating these options for moving forward with the bridge replacement, and I look forward to this getting built.

Best regards,
Paul Sochacki
Rose Village Resident

IBR Draft SEIS - RECORD #2116 DETAIL

First Name :	Andrew
Last Name :	Lindstrom
Attachments :	DSEIS-2116_Lindstrom_Original.pdf (3 kb)

IBR Draft SEIS - RECORD #2116 DETAIL

Submission Date : 11/16/2024
First Name : Andrew
Last Name : Lindstrom
Business/Organization/Agency :

Submission Input :

My name is Andrew and I'm writing to you from Portland. I have a huge number of concerns with this project - too many to fit into a single comment - so will be submitting more than one. This first comment will cover my concerns with the MAX light rail station locations, and broader issues with the inadequacy of the transit provision for this project.

To be clear, I support extending the MAX Yellow line into Vancouver, but given the historical compromises that were required to get the line built (namely, that it was a local project in Portland after failing multiple ballot funding measures) mean that it's relatively slow. It functions well as a higher capacity mode, but being speed limited on Interstate Ave to 30 mph and having a lot of stops makes travel times far too slow to reasonably compete with driving. Simply extending the line into Vancouver is not likely to change this - though it will make public transit connections across the Columbia much easier by eliminating a transfer and the need to sit in bridge traffic. If our states are as serious about the climate crisis as they purport to be, spending a ton of money on what is essentially a freeway widening project with some transit provision tacked on after the fact is a poor choice.

The insistence on a high fixed-span bridge (which has yet to be cleared by the Coast Guard) means that providing a station at Vancouver's recently redeveloped waterfront will be the tallest rail transit station in the world (as measured from street level) at 100 feet. The current tallest station in the world (Smith-9th Streets on the New York Subway) is 88 feet above the street, and presents serious access problems.

This problem comes about purely as a result of the geometry of the bridge, and is only necessary because of the project's insistence on this high fixed span. Given that the project's purpose and need focuses specifically on the transit travel issues, it's inexcusable that the design of the bridge precludes a sane station at one of the critical future economic and social hubs of Clark County. There's a reason that very high elevated mass transit stations are rare - it's not conducive to a good passenger experience. Where other transit systems cross navigable waterways, they do so on movable spans (as the Chicago L's various crossings of the Chicago River, or the New York Subway's crossings of the Harlem River), in tunnels (in most of the world), or if they must be on high, fixed spans there are no stations located on or near the span (as is the case for New York Subway lines crossing the Manhattan or Williamsburg bridges, or for the PATCO crossing the Ben Franklin in Philadelphia). It is clear just from this design choice that the planners and engineers responsible for this project are designing a highway bridge (and series of interchanges) first, and retrofitting public transit onto it afterwards.

While a tunnel seems to me to be entirely practical, I understand this has been functionally ruled out. I won't comment further on that, though I do think it should be studied with more care. Given the clear and obvious issues the insistence on a high fixed span bridge presents to both river navigation, air traffic, and to any future rail transit stations, I see no reason why a movable span has been functionally ruled out. A lower but still higher than the existing bridges movable span would reduce bridge lifts, make for a better transit extension, and solve

all issues relating to river and aviation navigability. I understand that a movable span means occasional impacts to vehicular traffic, but the traffic issues on I5 (particularly northbound in the PM peak out of Portland) are not a result of the span being movable - they are a result of sprawling land use patterns in the broader metro area.

This analysis needs to seriously consider a movable span. It presents a much easier regulatory option, better transit design and a more pedestrian accessible bridge to boot.

IBR Draft SEIS - RECORD #2117 DETAIL

First Name :	Gemma
Last Name :	Duyck
Attachments :	DSEIS-2117_Duyck_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2117 DETAIL

Submission Date :	11/16/2024
First Name :	Gemma
Last Name :	Duyck
Business/Organization/Agency :	

Submission Input :

What are the pros cons for building the new bridges?

IBR Draft SEIS - RECORD #2118 DETAIL

First Name :	Gemma
Last Name :	Duyck
Attachments :	DSEIS-2118_Duyck_Original.pdf (4 kb)

IBR Draft SEIS - RECORD #2118 DETAIL

Submission Date :	11/16/2024
First Name :	Gemma
Last Name :	Duyck
Business/Organization/Agency :	

Submission Input :

I don't think the new bridge would be beneficial at this time because there is nothing wrong with the current bridge in my opinion.

IBR Draft SEIS - RECORD #2119 DETAIL

First Name :	Karin
Last Name :	Landsberg
Attachments :	DSEIS-2119_Landsberg_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #2119 DETAIL

Submission Date : 11/16/2024
First Name : Karin
Last Name : Landsberg
Business/Organization/Agency :

Submission Input :

Dear IBR Program,

Thank you for the opportunity to review and comment on the SDEIS. I have reviewed the Energy, Climate, and Air Quality chapters. These chapters provide a solid summary of the analyses that followed standard procedures, meet regulatory requirements, and support decision making. Thank you for this work!

I commend the program for recognizing that nature of these disciplines is that there is often little difference between the alternatives being considered at the time of NEPA; this project's results fit that pattern. I understand that some will want this project to provide changes that cannot be expected from one project. Greater reductions in greenhouse gas emissions must take into account the larger travel shed, land use patters, and vehicle electrification. We must continue efforts to reduce emissions beyond this and other individual projects.

I have reviewed three chapters and offer these comments for clarification and highlight some parts that I consider exceptionally well done.

Air Quality – Chapter 3.10

• 3.10-1 – I appreciate that the area has completed carbon monoxide maintenance requirements and that this project did not complete these analyses.

• 3.10-2 – In the table, emission changes between the CRC and Modified LPA are given in percentages, however the explanation notes other units. Because the changes are noted in percentages, other units are unnecessary and may be confusing to some.

• 3.10-4 – The MSAT description states that two MOVES models were run. It is not clear why two models were necessary. Were the OR and WA portions each run separately? Suggest simply stating that MOVES was run.

• 3.10-4 – The criteria pollutants description of attainment and maintenance are unclear. EPA designates any area that is meeting the air quality standards as "attainment." The term "maintenance" is used to refer to areas that were previously designated "nonattainment," now have air quality at meets the standard, have been redesignated as "attainment," AND that for the first 20 years of being redesignated as "attainment" are under the requirements of a maintenance plan. Areas that have always been in attainment do not have maintenance requirement plans and areas that have fulfilled the 20-year maintenance plan requirements are no longer considered maintenance areas.

• Table 3.10-2 – I appreciate the clear identification of sensitive receptors near the program area.

• Table 3.10.5 – In the final column, modified LPA difference from No Build, the percent differences are given in tenths. This gives the illusion of precision that is not inherent in the modeling. Recommend rounding to whole numbers.

• Table 3.10.5 – PM results. I am curious why PM2.5 is going down while PM10 is increasing. Is this due to brake and tire wear increasing with the increased VMT while PM from exhaust is declining? A brief description of the cause of these differing trends would be informative.

• 3.10-13 – Modified LPA section describes the application of conformity rules for construction in the Portland. I recommend stating, “these rules do not apply to areas like Portland and Vancouver…” to clarify that the rules also apply to Vancouver.

• 3.10-13 – Indirect effects. I appreciate the recognition the project is adding active and public transportation facilities as well as highway improvements and the role all of additions these play in regional transportation patterns and demands.

Energy – Chapter 3.12

• Table 3.12-1 – Two different units are given for the same result, BTU and mmBTU. Please clarify which units are appropriate.

• Table 3.12-1 – Total GHG emissions during operations. The units are MT, but of what? CO2 or CO2e?

• Table 3.12-2 – I appreciate the explanation that the effects of the various options are not meaningfully different.

• 3.12-10 – This section begins with a statement that OR and WA both have regulations and programs in place to reduce GHG emissions. I suggest adding a sentence regarding the states’ energy regulations. Yes, they are mostly the same thing, but as this is the energy chapter, it seems relevant to clearly mention energy.

Chapter 3.19 – Climate Change

• 3.19-1 – The last two paragraphs of the opening section do a fantastic job of setting the context for the project and the project GHG effects. Thank you.

• 3.19-2 – Last bullet of first bulleted list ends with “and increase monitoring.” Monitoring of what?

• 3.19-3 – Last row of table, Modified LPA column. GHG emissions reduction – for what area?

• 3.19-8 – Climate Commitment Act – suggest adding that the Legislature is investing funds from the credit sales in projects and programs to reduce emission. For transportation, these include public transportation, active transportation, and low carbon energy/fuels programs.

• 3.19-8 – CETA citation – There’s an RCW for that. Please cite it.

• 3.19-11 – I appreciate that the description of reducing operational emissions includes roadway pricing, as that is likely to be substantially more effected than other strategies to reduce emissions. Again, thank you for including this important element.

• 3.19-12 – The description of reducing construction emissions seems to miss several key areas for action – reducing emissions from construction equipment and reducing embodied emissions in materials. I believe these are touched on in other places, but this quick summary seems like a good place to highlight them.

• 3.19-12 – Community resilience bullet mentions that equity in processes is a priority, but this seems like a vague promise. If this is covered in more detail in another chapter, please add a reference here.

• 3.19-13 – The text states that there would be a reduction in the number of trips across the river and that there would be 12,500 new transit trips due to tolling. The reduction in trips, is that total trips, or vehicle trips? In other words, is the change just that 12,500 trips are moving from personal vehicles to transit, i.e., the bridge will have 12,500 vehicles crossing, but the same number of people?

• 3.19-13 – The paragraph above Active Transportation states that the Modified LPA would result in a small but measurable difference in energy and GHG emissions. Elsewhere, the text has, accurately describe the changes and statistically insignificant. It is my understanding that traffic data has an accuracy of /- 10% or so. Using traffic data with that level of uncertainty cannot lead to certainty in a 1% difference in emissions results. Suggest stating that the Modified LPA, “would likely result in small reductions in energy consumption and GHG emissions.”

• 3.19-14 – the use of “substantially lower” in describing No Build and “lower” in describing LPA is confusing. When saying that emissions are lower, be sure to say compared to what – existing conditions. Suggest consistent language across the board. Also suggest noting that the electrification of vehicles will be the driver of the largest portion of the emission reductions. The electrification of vehicles that will be using the project has nothing to do with the project and confuses the projects effects (or lack of effects) on emissions.

• 3.19-15 – Table. Portland Metro area – does that include Vancouver? If so, please indicate that.

• 3.19-16 – Operational emissions. The end of first paragraph links the reduction in emissions from switching to electric vehicles to how the grid is powered. The studies I’ve seen show that even with coal fired electricity, EVs produce less GHG emission than petroleum fueled vehicles. So, while a cleaner grid is important to reach zero emissions, reducing emissions with EVs will happen regardless of the power sources for the grid. It is important to clarify this so that people understand that there is benefit to electrifying vehicles before the grid is zero emission.

• 3.19-16 – Table, please add a note to define “fuel cycle emissions.” I expect that many people do not understand what this refers to.

• 3.19-16 – Table, Modified LPA difference from No Build – please round percentages, going out to the hundredths place gives a false sense of precision.

• 3.19-17 – Table. Going out to the hundredths place implies a level of precision that is not inherent in the analysis. Please round.

• 3.19-19 – I like the description of the next levels of analysis that could be done on materials and the reason why not included here. The program will continue to make decisions as the design is further developed.

• 3.19-20 – Last line of page – why 11 years of operation? That seems random. Is from the end of construction out to the design year?

• 3.19-22 – Long-term effects section states that the program would reduce emissions. The results in the table on the previous page shows an overall increase in emissions because construction emissions are larger than the operational reductions. That doesn't mean the project shouldn't be undertaken, but it is important to be clear about the effects.

Finally, thank you for the great work on this complex project. I look forward to seeing it move forward.

Best,

Karin Landsberg

IBR Draft SEIS - RECORD #2120 DETAIL

First Name :	Diane
Last Name :	Edenholm
Attachments :	DSEIS-2120_Edenholm_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2120 DETAIL

Submission Date :	11/16/2024
First Name :	Diane
Last Name :	Edenholm
Business/Organization/Agency :	

Submission Input :

I have lived in my neighborhood for 50 yrs, I have seen the destruction of North Portland with multifamily housing, and bad planning. I believe this is just another plan by people who dont drive the I5 DAILY.

IBR Draft SEIS - RECORD #2121 DETAIL

First Name :	Jon
Last Name :	Anderson
Attachments :	DSEIS-2121_Anderson_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2121 DETAIL

Submission Date :	11/16/2024
First Name :	Jon
Last Name :	Anderson
Business/Organization/Agency :	

Submission Input :

FULL STOP! CLARK COUNTY CITIZENS/VOTERS DO NOT WANT THIS PROJECT TO PROCEED AS LONG AS IT INCLUDES TOLLS, LIGHTRAIL FROM PORTLAND, AND NO 3RD BRIDGE! IT IS A GOV'T DEBACLE AWAITING TAX $ TO BAIL IT OUT AND PROVIDE NEGATIVE CONSEQUENCES!

IBR Draft SEIS - RECORD #2122 DETAIL

First Name :	Brian
Last Name :	mcdonald
Attachments :	DSEIS-2122_mcdonald_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2122 DETAIL

Submission Date :	11/16/2024
First Name :	Brian
Last Name :	mcdonald
Business/Organization/Agency :	self

Submission Input :

The proposed bridge has no character or historical significance. Can't you leave or add "The Towers" as a historical (cosmetic) look?

IBR Draft SEIS - RECORD #2123 DETAIL

First Name :	Shanon
Last Name :	Kuehl
Attachments :	DSEIS-2123_Kuehl_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2123 DETAIL

Submission Date :	11/16/2024
First Name :	Shanon
Last Name :	Kuehl
Business/Organization/Agency :	

Submission Input :

I would like to see four through lanes both North and South bound. The current proposed three through lanes likely will not accommodate current and future traffic.
Thank you

IBR Draft SEIS - RECORD #2124 DETAIL

First Name :	Megan
Last Name :	Swift
Attachments :	DSEIS-2124_Swift_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2124 DETAIL

Submission Date : 11/16/2024

First Name : Megan

Last Name : Swift

Business/Organization/Agency :

Submission Input :

Why can't Portland Transportation "bridge builders" get it through its thick skull that Southwest Washington doesn't want your damn light rail? Just replace the bridge. End of story. Save your studies for making a third bridge; for Christ's sakes there's seven-eight bridges in Portland. Why can't these 2 states figure out how to buy one more bridge, Interstate? Save our money for that. East Van., Camas, Washougal residents use Glenn Jackson, a bridge further East is indeed needed. Show the hands who actually ride light rail. It can't pay for itself! "Little suburb of Portland needs a safe way to get to work and Oregon has to add this and that and this and that and this and that and then you get your bridge, fu. SW WA will pay more, unfairly, no matter what. It's your closest work force. You already raid our paychecks. Shame on Oregon legislators. Shame on ODOT, PBOT, COP. Pay your share or don't spend it.

IBR Draft SEIS - RECORD #2125 DETAIL

First Name :	Mohammad
Last Name :	Khalid
Attachments :	DSEIS-2125_Khalid_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2125 DETAIL

Submission Date :	11/16/2024
First Name :	Mohammad
Last Name :	Khalid
Business/Organization/Agency :	

Submission Input :

I think it's important to upgrade the current bridge, but I am afraid it will create more problems for the next 15 years. Traffic is already bad with two bridges connecting Portland to Vancouver I can't imagine how it will be if this project was approved. I am against this project.

IBR Draft SEIS - RECORD #2126 DETAIL

First Name :	Hassan
Last Name :	Mohammed
Attachments :	DSEIS-2126_Mohammed_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2126 DETAIL

Submission Date :	11/16/2024
First Name :	Hassan
Last Name :	Mohammed
Business/Organization/Agency :	FHWA

Submission Input :

Support for seismic resilience and reduced congestion benefits.

Concerns about displacement impacts on residents and businesses.

Interest in tolling strategies and their effect on affordability.

Encouragement for transparency and public engagement throughout the project.

IBR Draft SEIS - RECORD #2127 DETAIL

First Name :	Paul
Last Name :	Leitman
Attachments :	DSEIS-2127_Leitman_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2127 DETAIL

Submission Date : 11/16/2024
First Name : Paul
Last Name : Leitman
Business/Organization/Agency :

Submission Input :

Thank you for the opportunity to comment. I'm happy to learn that the bridge will include a multi-use path on the bridge. This will provide an important connection between the communities in Vancouver and Portland, and allow for people the opportunity to walk/bike across the Columbia River. However, I'd like to encourage the project team to consider moving the multi-use path onto the same side of the bridge as the MAX light rail alignment.

Firstly, this provides an opportunity to use the MAX alignment as a buffer between the traffic lanes and the path. Freeways produce a lot of noise and can degrade the quality of the walking/biking experience.

Secondly, by positioning the multi-use path and MAX alignment on the same side of the bridge, you can maximize connectivity and multi-modal trips. As a frequent bike rider and transit user, I often take my bike onto MAX or the bus. Having a MAX station directly along the path provides better connection opportunities and gives people more choices. If they remain separated, you lose out on connectivity and the opportunity to capitalize on the access-to-transit benefits of the path.

IBR Draft SEIS - RECORD #2128 DETAIL

First Name :	Paul
Last Name :	Leitman
Attachments :	DSEIS-2128_Leitman_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2128 DETAIL

Submission Date : 11/16/2024
First Name : Paul
Last Name : Leitman
Business/Organization/Agency :

Submission Input :

Thank you for the opportunity to comment. I'm am excited for the future extension of the MAX Yellow Line into Vancouver. This is an important component of transportation between Portland and Vancouver and will be very beneficial to our communities.

I am writing to request the project team to think long-term. We know that the existing service is limited to two-car trains. But with a potential future downtown MAX tunnel, there may be opportunities to make trains longer in the future (up to three or four cars long).

When designing/building the new MAX stations, it would be great if the project team can ensure the design does not preclude making stations longer. It would be a shame to lock ourselves in to the two-car design at a time when we know there is a potential for a future downtown tunnel (even if it is not funded or designed at this time).

IBR Draft SEIS - RECORD #2129 DETAIL

First Name :	Paul
Last Name :	Leitman
Attachments :	DSEIS-2129_Leitman_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2129 DETAIL

Submission Date :	11/16/2024
First Name :	Paul
Last Name :	Leitman
Business/Organization/Agency :	

Submission Input :

Thank you for the opportunity to comment. I would like the project team to consider design treatments to protect the multi-use path along the bridge from weather, including rain or sun. Our region receives approximately 40 inches of rain each year, most of it falling between October and June. Providing a cover from the rain can be a supportive detail that ensures people walking or biking across the bridge can do so comfortably for nine months of the year.

During the other three months during the summer, we're experiencing increasing high temperatures. Protection from the sun will also be critical to reducing risk of intense heat for people walking or biking across the bridge.

IBR Draft SEIS - RECORD #2130 DETAIL

First Name :	Vancouver
Last Name :	Resident
Attachments :	DSEIS-2130_Resident_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2130 DETAIL

Submission Date :	11/16/2024
First Name :	Vancouver
Last Name :	Resident
Business/Organization/Agency :	

Submission Input :

I would like to see how extending light rail transit to existing C-TRAN park and ride lots at 99th Street Transit Center and Salmon Creek would impact transit travel times, vehicle travel times, hours of daily congestion, and persons crossing the Interstate Bridge each day via transit.

IBR Draft SEIS - RECORD #2131 DETAIL

First Name :	Jeff
Last Name :	Ramsey
Attachments :	DSEIS-2131_Ramsey_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2131 DETAIL

Submission Date :	11/16/2024
First Name :	Jeff
Last Name :	Ramsey
Business/Organization/Agency :	

Submission Input :

To consider: transit should be planned to accomodate future needs including 4 car trains and even high speed rail. Bike and pedestrian lanes should be aligned with and buffered by transit for safety. The spiral for bike/ped proposed for the north end is ridiculous and will impede users - extend to Evergreen instead. The traffic estimates that this analysis uses are patently incorrect, and at odds with all other regional transportation goals. It would seem that the IBR team is using these inflated estimates to justify a project that is out of scale with the need, including but not limited to the second auxiliary lane and all the other highway widening proposed miles from the bridge itself. This analysis and the scant visual depictions provided only show what an expensive tragedy is being proposed. IBR team should go back to the drawing board to propose a right-sized project focused narrowly on bridge replacement and transit and active transportation upgrades without extensive freeway expansion. Analysis should consider building a simple tunnel for cars and keeping the existing bridges for transit and active transportation.

IBR Draft SEIS - RECORD #2132 DETAIL

First Name :	Evan
Last Name :	Bilstrom
Attachments :	DSEIS-2132_Bilstrom_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2132 DETAIL

Submission Date :	11/17/2024
First Name :	Evan
Last Name :	Bilstrom
Business/Organization/Agency :	

Submission Input :

The new crossing must not include a lift span; must include light rail.

IBR Draft SEIS - RECORD #2133 DETAIL

First Name :	Amity
Last Name :	Givens
Attachments :	DSEIS-2133_Givens_Original.pdf (4 kb)

IBR Draft SEIS - RECORD #2133 DETAIL

Submission Date :	11/17/2024
First Name :	Amity
Last Name :	Givens
Business/Organization/Agency :	PCC Community College

Submission Input :

I often use the C street ramp and find it a convenient way to get to downtown Vancouver.

IBR Draft SEIS - RECORD #2134 DETAIL

First Name :	Thomas
Last Name :	Craig
Attachments :	DSEIS-2134_Craig_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2134 DETAIL

Submission Date :	11/17/2024
First Name :	Thomas
Last Name :	Craig
Business/Organization/Agency :	

Submission Input :

Right-size the IBR project! Consider real alternatives to the currently proposed mega-freeway expansion. Save money and promote more efficient mobility by not adding *any* new lanes. (Yes--'auxiliary' lanes would be new lanes.) Offer new transportation options that are not currently available (light rail, safe active transportation connections). But do not use the excuse of earthquake resilience to shackle future taxpayers with the maintenance of unsustainable infrastructure.

Both Oregon and Washington have dire needs to restore and improve their transportation infrastructure, and require billions of dollars to do that work--from restoring aging bridges to reconnecting communities split by freeways to building a basic grid of sidewalks in currently inaccessible areas. The IBR project as it is currently being pursued will prevent that work, not advance it. This is a waste of financial resources and a radical over prioritization of one particular type of commute (cross-state by car) at a time when both states must be seeking to enable the diversity of other types of mobility that desperately need more attention.

IBR Draft SEIS - RECORD #2135 DETAIL

First Name :	Doug
Last Name :	Roland
Attachments :	DSEIS-2135_Roland_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2135 DETAIL

Submission Date :	11/17/2024
First Name :	Doug
Last Name :	Roland
Business/Organization/Agency :	Pleasant Valley Electric

Submission Input :

we dont want a bridge with only 3 lanes each way, we want 5 lanes each way. we want no light rail at all, its ugly and old fashioned and is 40% of the cost of the bridge. build a monorail. we want a bridge thats high enough to fit all river traffic under it. if that cant be accomplished then build a new one in another place. dont be stupid.

IBR Draft SEIS - RECORD #2136 DETAIL

First Name :	Andrew
Last Name :	Queen
Attachments :	DSEIS-2136_Queen_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2136 DETAIL

Submission Date :	11/17/2024
First Name :	Andrew
Last Name :	Queen
Business/Organization/Agency :	

Submission Input :

This environmental impact statement fails to take induced demands into the equation. This bridge with new lanes will quickly fill with traffic as always. We've known for well over 50 years that more lanes don't reduce congestion. This bridge should be replaced and be earthquake ready but don't add more lanes. More lanes never fixes the problems. We should instead add a max line on the bridge as in this proposal, but no new lanes.

IBR Draft SEIS - RECORD #2137 DETAIL

First Name :	Remington
Last Name :	Evert
Attachments :	DSEIS-2137_Evert_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2137 DETAIL

Submission Date :	11/17/2024
First Name :	Remington
Last Name :	Evert
Business/Organization/Agency :	

Submission Input :

I read through the supplemental document regarding the feasibility of a tunnel and it is actually not shocking how little time went into fleshing out that document. It reeks of bare minimum effort as a true alternative option compared to what is on offer in the SEIS. A tunnel should have been given full consideration from the start especially given the known challenges to everyone regarding a new bridge (river traffic, air traffic, and rail traffic) that all are immediately avoided by a tunnel. This entire process, two rounds worth, explains why so many people regardless of political leaning are fed up with their governments. The proposed options for a new bridge are a boondoggle led by supposed experts who are lying about important details and using fictional data to try and support their preferred outcome. Build a tunnel or don't do anything at all.

IBR Draft SEIS - RECORD #2138 DETAIL

First Name :	laurie
Last Name :	benoit
Attachments :	DSEIS-2138_benoit_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2138 DETAIL

Submission Date :	11/17/2024
First Name :	laurie
Last Name :	benoit
Business/Organization/Agency :	

Submission Input :

Build a 3rd bridge somewhere West of Troutdale, Oregon that would go East of Vancouver, Washington that is a toll bridge. Keep the I -5 and 205 bridges, all are needed for transportation, light rail would be nice too.

IBR Draft SEIS - RECORD #2139 DETAIL

First Name :	Joshua
Last Name :	Hancock
Attachments :	DSEIS-2139_Hancock_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2139 DETAIL

Submission Date :	11/17/2024
First Name :	Joshua
Last Name :	Hancock
Business/Organization/Agency :	

Submission Input :

As someone who takes public transportation to work between Beaverton and Swan Island, I'm a strong advocate for increasing public transportation options to get to Vancouver. I believe increasing alternative modes to driving will be one of the major keys to reduce traffic congestion along this corridor, especially since current alternatives are lackluster. Alternative modes to driving will also be a key factor in reducing climate change impacts for the Portland metro area.

I think it's also important to stress that if these alternative modes (like biking, BRT, LRT) aren't taken seriously, they will be inconvenient and not convince drivers to switch to alternative modes, which will just increase traffic more until the bridge reaches capacity.

I'm looking forward to eventually move closer where I work into north Portland, where this project would allow me to either take LRT or bike over to Vancouver.

IBR Draft SEIS - RECORD #2140 DETAIL

First Name :	Jeff
Last Name :	Bjorn
Attachments :	DSEIS-2140_Bjorn_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2140 DETAIL

Submission Date :	11/17/2024
First Name :	Jeff
Last Name :	Bjorn
Business/Organization/Agency :	

Submission Input :

In general, the design looks much more functional than the current infrastructure.

Eliminating the exit from northbound I-5 onto Hayden Island should help northbound traffic flow.

It seems that moving the pedestrian / bicycle lanes closer to the light rail lanes could better facilitate connections between the two.

Thank you for your consideration.

IBR Draft SEIS - RECORD #2141 DETAIL

First Name :	RACHEL
Last Name :	SLOCUM
Attachments :	DSEIS-2141_SLOCUM_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2141 DETAIL

Submission Date : 11/17/2024
First Name : RACHEL
Last Name : SLOCUM
Business/Organization/Agency :

Submission Input :

Dear people:
I am a Portland resident who is bus and bike-dependent. I support the Just Crossing Alliance's proposals for the crossing:
1) Don't expand the freeway. We know that expansion results in more cars on the expanded road and will add to the already poor air quality of the area.
2) Integrate transit and the multi-use path so people can use both easily. Transit lanes should buffer people on the multi-use path. Connect the bridge to the Williams/Vancouver corridor.
3) Offer a low income toll discount
4) Plan to include Bus Rapid Transit, heavy rail and four car light rail that align with the downtown transit system

Thank you. Sincerely, Rachel Slocum

IBR Draft SEIS - RECORD #2142 DETAIL

First Name :	Cheri
Last Name :	Morey
Attachments :	DSEIS-2142_Morey_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2142 DETAIL

Submission Date : 11/17/2024
First Name : Cheri
Last Name : Morey
Business/Organization/Agency :

Submission Input :

I think it is a travesty that we continue to delay the expansion of the Interstate Bridge . This should have been complete a decade ago. We need to see vision and leadership to move forward with action and a product so that communities can be joined and commerce can flow. This is a generational issue that should rise above political debate. No choice will be perfect because culture and nature develop and change; therefore, compromise and action are needed now.
Thank you

IBR Draft SEIS - RECORD #2143 DETAIL

First Name :	Jane
Last Name :	Kim
Attachments :	DSEIS-2143_Kim_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2143 DETAIL

Submission Date : 11/17/2024

First Name : Jane

Last Name : Kim

Business/Organization/Agency :

Submission Input :

I live in N Portland and use the IBR to go to Vancouver and Vancouver Waterfront about 5 times a month. I avoid using the bridge after 2pm on weekdays because traffic seems to start then and even getting onto the I-5 from the N Interstate exit takes way too long. Therefore, I'm happy the new construction will help appease the current traffic issue. My concern, however, is the toll that'll be implemented. It's been nice to use the bridge free of charge, but once I'll have to pay a toll, I think I'll feel less inclined to take my family across the state border for dining & recreation and will resort to staying in the Portland area. I'm wondering if Portland/Vancouver residents will be able to enroll in some special program to help cut toll costs. My last concern is about possible worse traffic that can happen during the construction of the new bridge. Since its projected completion date is 2045, I'm wondering when the construction will start and how the traffic is anticipated to look. I say this because I'm imagining some construction work will have to take place during the day causing even slower traffic and that going on until 2045 seems very inconvenient for those using the bridge.

IBR Draft SEIS - RECORD #2144 DETAIL

First Name :	Zane
Last Name :	Nye-Badger
Attachments :	DSEIS-2144_Nye-Badger_Original.pdf (2 kb)

IBR Draft SEIS - RECORD #2144 DETAIL

Submission Date : 11/17/2024
First Name : Zane
Last Name : Nye-Badger
Business/Organization/Agency :

Submission Input :

Being raised around and immersed in the history of the current I-5 bridge, I understand the importance of replacing the structure. However, my concerns are also numerous. Reconstructing the bridge will create issues for boat traffic, it may also affect wildlife traversal such as the steelhead and salmon populations. Reconstructing the bridge will also have severe adverse effects on daily commuters unless another option is put in place first. My recommendation is to construct additional standalone bridges running parallel to the current structure to ease traffic flow. These standalone bridges only need to be a single-lane on either side with shoulders - that way when replacement of the main structure is underway traffic can still flow more or less unimpeded. Building a third standalone for the MAX line will also decrease the traffic on the existing bridge.

Finally, replacement of the current bridge will have a negative effect on the local populations' mental healths. It is important when replacing a landmark to pay homage to the original construction, preserving the original skyline as much as possible. Newer technology and construction methods can recreate a bridge similar to the existing one while still increasing capacity and resilience. People would be more willing to support a project like that than replacing a unique landmark with yet another grey slab of a bridge.

My ideal suggestion would be to construct another drawbridge much like the existing, but run two decks. The top deck would be relegated to motor vehicle traffic while the lower deck would be reserved for cyclists and pedestrians - with momento pieces on display on this lower deck as well as lookout sights. This would remove the need for pedestrians and cyclists to crowd the two tiny walkways on either side of the bridge and provide tourists an additional place to visit which could further fund the project instead of running tolls and additional taxes to fund the project.

IBR Draft SEIS - RECORD #2145 DETAIL

First Name :	Robert
Last Name :	Bullard
Attachments :	DSEIS-2145_Bullard_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2145 DETAIL

Submission Date : 11/17/2024
First Name : Robert
Last Name : Bullard
Business/Organization/Agency :

Submission Input :

The current proposals present three equally overpriced alternatives that will not solve the congestion issues facing Interstate commuters and freight haulers. The primary purpose of this bridge is to move people and freight. The way people do that is with their automobiles and trucks. Instead we have been presented with a transit funding boondoggle. This plan needs to be revised as follows:

1. Increase the number of traffic lanes from 3 in each direction to 4 or 5.
2. Eliminate funding for electric buses and light-rail.
3. Maintain bridge height to accommodate current river traffic and support the maritime industries that depend on access to the river.

This will decrease the price of the project and make it cost-efficient. The current plan is untenable.

IBR Draft SEIS - RECORD #2146 DETAIL

First Name :	James
Last Name :	Roop
Attachments :	DSEIS-2146_Roop_Original.pdf (2 kb)

IBR Draft SEIS - RECORD #2146 DETAIL

Submission Date :	11/17/2024
First Name :	James
Last Name :	Roop
Business/Organization/Agency :	Retired

Submission Input :

To Whom It May Concern,

In regard to any of the three bridge designs, I would strongly suggest, (and from my own experience in bicycle commuting across the Hawthorne Bridge for many years); that a separate and distinct bicycle lane be provided, in each direction, apart from any pedestrian walkway. This is for safety concerns for the situation when a bicyclist passes a pedestrian.

If bicycles and pedestrians are sharing the same "travel-way", then the bicycle lane should be clearly delineated, separate from the pedestrian walk-way. Furthermore, if the "travel-way" provided for pedestrians and bicyclists is very limited in width, then a "passing lane" for bicyclists should be outlined clearly in white or yellow paint, so as to provide a safe margin of distance when a bicyclist passes a pedestrian.

Additionally, signs should be posted at the entrance to the bridge, in each direction, stating that there is a "distinct passing lane" provided for bicyclists to pass pedestrians safely.

I speak from experience in using Portland's Hawthorne Bridge, (as stated earlier), as a bicyclist and having pedestrians walking too close to the passing bicycle, (even after verbal notification to the pedestrian), and near collisions narrowly avoided. Had a clear line been painted on the bridge's sidewalk, indicating the specific lane of travel for bicyclists, (and pedestrians), then the bridge's travel-way for both pedestrians and bicyclists would have been a much safer area for each group of travelers.

Thank you for hearing my concern about bicycle and foot travel on the new Oregon/Washington Interstate Bridge.

Respectfully submitted on 11-14-2024,

James R. Roop

IBR Draft SEIS - RECORD #2147 DETAIL

First Name :	Andrew
Last Name :	Peterson
Attachments :	DSEIS-2147_Peterson_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2147 DETAIL

Submission Date :	11/17/2024
First Name :	Andrew
Last Name :	Peterson
Business/Organization/Agency :	

Submission Input :

Why not just add another bridge near to help relieve congestion? Leaving the historic bridge in place that adds so much character to the town. It still is functional and repairable just add what is needed saving some money. Over wasting more money and taking away a historic land mark.

IBR Draft SEIS - RECORD #2148 DETAIL

First Name :	Baher
Last Name :	Butti
Attachments :	DSEIS-2148_Butti_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2148 DETAIL

Submission Date :	11/17/2024
First Name :	Baher
Last Name :	Butti
Business/Organization/Agency :	Iraqi society of Oregon

Submission Input :

I support renewal of the bridge with a fixed one level span. I recommend considering the rate of tolling for low income people like having discount.

IBR Draft SEIS - RECORD #2149 DETAIL

First Name :	Bryan
Last Name :	Swan
Attachments :	DSEIS-2149_Swan_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2149 DETAIL

Submission Date :	11/17/2024
First Name :	Bryan
Last Name :	Swan
Business/Organization/Agency :	

Submission Input :

Any new bridge should at least double the existing 3 traffic lanes. It also needs to be raised so a lift span is not required. Anything less and the new bridge will be obsolete before it's even built.

IBR Draft SEIS - RECORD #2150 DETAIL

First Name :	Shannon
Last Name :	D'aurora
Attachments :	DSEIS-2150_D'aurora_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2150 DETAIL

Submission Date :	11/17/2024
First Name :	Shannon
Last Name :	D'aurora
Business/Organization/Agency :	

Submission Input :

I only travel by bike or transit and I regularly travel between Portland and Vancouver. Please make the bridge friendly for multi-modal transportation! Please put the bike path and transit stations on the same side of the bridge and accept other recommendations put forth by street trust or bicycle transit alliance.

IBR Draft SEIS - RECORD #2151 DETAIL

First Name :	Theresa
Last Name :	Cibart
Attachments :	DSEIS-2151_Cibart_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2151 DETAIL

Submission Date :	11/17/2024
First Name :	Theresa
Last Name :	Cibart
Business/Organization/Agency :	

Submission Input :

As was clearly addressed in the last go around, most do not want light rail. Buses can be set up with direct routes. I am in favor of a Plan that does not include light rail and the crime that comes with it.

IBR Draft SEIS - RECORD #2152 DETAIL

First Name :	Robert
Last Name :	Link
Attachments :	DSEIS-2152_Link_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2152 DETAIL

Submission Date :	11/17/2024
First Name :	Robert
Last Name :	Link
Business/Organization/Agency :	Retired

Submission Input :

1.1 Trips include"bikes and walking.

1.3.2 no mention of bikes or walking.

Bike and walking exposure- Never an accident between vehicle and bikes or walkers. Most bike trails are along roadways with "exposure".

2.2.8 Tolling. Higher rates during peak times penalizes folks that have to go to work, etc.

No account billing will discourage one time visitors to the Vancouver waterfront or Hayden Island shoppers.

3.1.17 There is no mention of how the "estimated bike and pedestrian#" was determined.

3.19.7 "changes "could" shift from cars to bikes and walking". There is no basis for this. Washington visitors to Portland for shopping, concerts, etc and Oregon visitors to WA for dinner, concerts, etc will bike or walk when sheep fly.

3.23. Does not mention the discouraging effects of tolls.

IBR Draft SEIS - RECORD #2153 DETAIL

First Name :	Connor
Last Name :	Eden
Attachments :	DSEIS-2153_Eden_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2153 DETAIL

Submission Date :	11/17/2024
First Name :	Connor
Last Name :	Eden
Business/Organization/Agency :	

Submission Input :

We clearly need a new bridge. The current one isn't safe to drive on, or safe from earthquakes. In particular, exit 1 on the Washington side onto Highway 14 is very dangerous. We would like to see that addressed in the final design. We also would like a lightrail; it would increase foot traffic to downtown Vancouver and promote less car traffic. We're on the fence about tolls, but understand the need to pay for the bridge. We ask that the committee keep locals and low-income residents in mind when deciding on a final design over multinational business interests. Thank you.

IBR Draft SEIS - RECORD #2154 DETAIL

First Name :	Connor
Last Name :	Eden
Attachments :	DSEIS-2153_Eden_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2153 DETAIL

Submission Date :	11/17/2024
First Name :	Connor
Last Name :	Eden
Business/Organization/Agency :	

Submission Input :

We clearly need a new bridge. The current one isn't safe to drive on, or safe from earthquakes. In particular, exit 1 on the Washington side onto Highway 14 is very dangerous. We would like to see that addressed in the final design. We also would like a lightrail; it would increase foot traffic to downtown Vancouver and promote less car traffic. We're on the fence about tolls, but understand the need to pay for the bridge. We ask that the committee keep locals and low-income residents in mind when deciding on a final design over multinational business interests. Thank you.

IBR Draft SEIS - RECORD #2155 DETAIL

First Name :	Gillian
Last Name :	Stockwell
Attachments :	DSEIS-2155_Stockwell_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2155 DETAIL

Submission Date :	11/17/2024
First Name :	Gillian
Last Name :	Stockwell
Business/Organization/Agency :	Geico

Submission Input :

We clearly need a new bridge. The current one isn't safe to drive on, or safe from earthquakes. In particular, exit 1 on the Washington side onto Highway 14 is very dangerous. We would like to see that addressed in the final design. We also would like a lightrail; it would increase foot traffic to downtown Vancouver and promote less car traffic. We're on the fence about tolls, but understand the need to pay for the bridge. We ask that the committee keep locals and low-income residents in mind when deciding on a final design over multinational business interests. Thank you.

IBR Draft SEIS - RECORD #2156 DETAIL

First Name :	Anthony
Last Name :	Mann
Attachments :	DSEIS-2156_Mann_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2156 DETAIL

Submission Date : 11/17/2024

First Name : Anthony

Last Name : Mann

Business/Organization/Agency :

Submission Input :

I think the financial burden of tolls should be spread between all the vehicles that cross the river. This would take away the incentive to use the i205 bridge to get out of paying tolls and the increasing amount of traffic that would come with that. More people cross on i205 which means you would bring in double the money or would be able to cut the current preposed toll costs down. Personally I would like to have seen this tolling put into place to fund a third bridge but maybe that could be looked at for a future project.

IBR Draft SEIS - RECORD #2157 DETAIL

First Name :	Karen
Last Name :	Gibson
Attachments :	DSEIS-2157_Gibson_Original.pdf (2 kb)

IBR Draft SEIS - RECORD #2157 DETAIL

Submission Date : 11/17/2024
First Name : Karen
Last Name : Gibson
Business/Organization/Agency :

Submission Input :

The DSEIS makes public comment difficult for the community.

The DSEIS, as currently presented, creates a high bar for making informed comment within the required 60 day Public Comment period. The DSEIS should include an area/neighborhood all-encompassing view of the project that incorporates all the information for that area, which currently resides across multiple overview and technical reports. The current document is a definite disadvantage for the public, hindering Public Comment to the benefit of the project, and a disadvantage to the community that lives within the program area.

I want to see a DSEIS section/technical report by area/neighborhood, such as Uptown Vancouver/Arnada. It would be an all-encompassing view of the project, incorporating all the information for that area, which currently resides across multiple overview and technical reports. The current document is a definite disadvantage for the public, hindering Public Comment to the benefit of the project, and a disadvantage to the community that lives within the program area.

I want to see the architectural renderings of the new Fourth Plain overpass, the new braided access to Fourth Plain from southbound I-5 at 39th street; the new SR-500 interchange; and any/all new auxiliary lanes, all the new noise walls, both East and West, from 39th south to the new Bridge.

It is unacceptable that one must study across multiple technical reports to even grasp what will happen in their neighborhood. Neighborhoods in the program area cannot make informed ‘Public Comment’ if they don’t know what the proposed changes ‘look’ like. The project is at enough of a ‘stage’ to put the changes in print. The same can be done for visualizing said changes.

IBR Draft SEIS - RECORD #2158 DETAIL

First Name :	Lisa
Last Name :	Markham
Attachments :	DSEIS-2158_Markham_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2158 DETAIL

Submission Date :	11/17/2024
First Name :	Lisa
Last Name :	Markham
Business/Organization/Agency :	Citizen

Submission Input :

Light rail needs to be extended into Wa. Undertaking this huge project without plans for light rail would be a tragedy. We can't let our fear of crime determine our future transportation choices. We need to get a handle on crime and homelessness but move forward with light rail. The 2 states need similar property tax and home prices to allow more people to LIVE WHERE THEY WORK. We could avoid thousands of commuters and rush hour traffic jams and the ever increasing air pollution just by having similar laws that would create more housing options in Oregon so people no longer need to make grueling commutes. I like the idea of diverting north, south through traffic some how without slowing it down.

IBR Draft SEIS - RECORD #2159 DETAIL

First Name :	Nicolas
Last Name :	Cota
Attachments :	DSEIS-2159_Cota_Original.pdf (2 kb)

IBR Draft SEIS - RECORD #2159 DETAIL

Submission Date :	11/17/2024
First Name :	Nicolas
Last Name :	Cota
Business/Organization/Agency :	

Submission Input :

I bike across this bridge every month to run errands in Vancouver. As someone who doesn't have access to a car, I'm seriously concerned about the strategies the IBR has for people who can't drive. First and foremost: I'm concerned that the separation of the walking and biking path from the MAX tracks is a huge oversight. People who are walking/biking should be able to be within quick access of the MAX platforms where possible in case of emergencies. Combining MAX and walk/ped trails onto a single separate structure will also allow people to hop on or hop off transit quickly if they end up getting tired or need to complete a 'hybrid' transit-bike, or transit-walk trip. I also believe that isolating the bike-ped walkway creates serious security concerns if not integrated with transit.

I don't see much in conversation about how the project can be phased and constructed in components. The team's current strategy to lump the entire corridor together worries me that the only option to replace this bridge requires billions that unnecessarily expands and rebuild interchanges not related to the bridge replacement itself. I hope the team can better find ways to prioritize replacing the bridge first, and then developing designs for the full interchange reconstructions in later phases.

Lastly,

I also own a home that abuts I-5 in North Portland. I am worried that the increased capacity of the bridge only does more to increase the air pollution and exposure that me and my family experiences everyday. I have a 4-month old son. Every breath of diesel and fumes that I smell from his bedroom window worries me that all this project is doing is making his exposure worse, and increasing his risk to numerous health conditions related to air pollution as he gets older. As of last year: Out of the 20 residents that live on our single block that faces the I-5 sound wall in North Portland: Over half live with asthma. Most of them were diagnosed while living here.

IBR Draft SEIS - RECORD #2160 DETAIL

First Name :	Jay
Last Name :	Rood
Attachments :	DSEIS-2160_Rood_Original.pdf (32 kb)

IBR Draft SEIS - RECORD #2160 DETAIL

Submission Date :	11/17/2024
First Name :	Jay
Last Name :	Rood
Business/Organization/Agency :	Rood Art Works Northwest LLC

Submission Input :

Public Testimony for the IBR Draft Supplemental EIS – November 18, 2024
Submitted by Jay Rood and Evan Rood, Rood Art Works Northwest LLC.

[redacted]

Thank you for this opportunity to submit our comments on the IBR Program Draft Supplemental EIS (SEIS), September 20, 2024. Our interests in testimony stem from the effects that the IBR's Modified Locally Preferred Alternative (LPA) will have on Downtown Vancouver's Columbia River shore "Bridges Landing Zone" and specifically on the impacted Captain George Vancouver Monument (CGV Monument) and all its highly valued community resource elements, Including: Boat of Discovery Public Art/Sculpture, Monument Park Plaza, Wave Walls Plaza; Monument Interpretive and Dedication Panel, recreation Gateway/Trail head to the Columbia River Renaissance Trail and Discovery Historic Loop Trail and Landscape plantings. These resources require comprehensive and accurate Section 4(f) evaluation at the very least.

THE IMPACTED RESOURCE

The Captain George Vancouver Monument (CGV Monument) was dedicated on October 30, 1992, as the capstone of the City's namesake Bicentennial (200 year) Celebration (The Monument is now 32 years old – by the time the IBR Program is built it will be 45 to 50 years old). This significant historic marker, landmark and urban park space are not just valued by the local City of Vancouver community, but also more broadly at the statewide and national levels. The iconic Boat of Discovery sculpture, Concrete and Stone Columns, Steel boat and Monument Plaza/Park wave walls, paving and plantings can be found in online and print literature and infographics from the City of Vancouver's Cultural, Art and Culture Plans, Public Art inventory and Public Art walking maps, including in State Trail and Cultural interpretive programs, the National Park Service Discovery Loop Trail and the National Historic Marker and Library of Congress registrations. The CGV Monument/Park/Plaza and Boat of Discovery are also an integrated part of other recreational, historic, and interpretive resources/facilities, including: the Columbia River Renaissance Trail (Waterfront Trail) and Discovery Historic Loop Trail – both highly used recreational, interpretive and public access systems.

The CGV Monument/Park/Boat of Discovery/Plaza were designed, built and installed by Jay Rood, artist. Mr. Rood was selected in 1992 by the CGV Monument Committee – requiring the monument be designed for and located specifically in its (current) south Columbia Street/Columbia River edge location. Furthermore, these Park, trail and art facilities were funded by local, private and Rotary Club donations, City of Vancouver Capital Improvement Program resources, and State of Washington and National Park Services grants (federally funded Discovery Historic Loop Trail, 2008).

The Captain George Vancouver Monument/Park/Boat Discovery Public Art/Sculpture and associated recreational and interpretive trail and art elements are managed under the City of Vancouver's Parks,

Recreation and Cultural Services Department (VRPDC); Culture, Arts & Heritage Commission; and City of Vancouver Parks Facilities Maintenance. Both the CGV Monument and Renaissance Trail are within a Park (0.4 acres) and Public Right-of Way (Columbia Street and Columbia Way).

Impacted Resources Delineated/Confirmed in FEIS and in SEIS:
The authors have reviewed both the former CRC FEIS/ROD, 2011 and the current IBR Program SEIS, 2024 and have made a record of this review along with response notes – see Appendices: A - FEIS and B – SEIS records attached to this comment document.

In the FEIS – CRC LPA Effects:
There are three sets of impacted resources found within the FEIS that identify, describe and evaluate the CGV Monument/Park/Boat Discovery Public Art/Sculpture and associated recreational and interpretive trail and art elements.
1. Waterfront Park (CGV Monument/Boat of Discovery Monument/Waves Plaza); Community/Neighborhood Park; 0.4 acres (18,730); VCPRD; local, City, regional, state and federal funding (Via both the renaissance trail and Discovery Historic Loop Trail)- Waterfront Park was funded thru the Waterfront Renaissance project.

2. Waterfront Renaissance Trail (Columbia River Renaissance Trail); 450 linear feet within bridge impact zone; VCPRD; City of Vancouver, State of Washington (potential federal funding pass thru – requires investigation)

3. Discovery Historic Loop Trail: 2.8 miles - 450 Linear feet – (as part of Renaissance Trail and Waterfront Park); VCPRD/NPS; funding City of Vancouver and federal funding (part of 2008 Confluence Project) *.
*Note: Should have triggered Section 106, 6(f) of the National Historic Preservation Act of 1966, as amended – 16 U.S.C. 470f Evaluation but did not under 36 CFR Part 800 – Protection of Historic Properties.

In the IBR SEIS – IBR M LPA Effects:
There are three sets of impacted resources found within the SEIS that identify resources related to the CGV Monument/Park/Boat Discovery Public Art/Sculpture – BUT DO NOT INCLUDE OR STATE ANY ASSOCIATION, CONNECTION, OR IMPACT to these CGV Monument resources (with exception of trails citiation in Parks and Receation Technical section: Draft Section 4(f) Evaluation – 4-7).

1. Columbia River Renaissance Trail (renamed from Waterfront Renaissance Trail - FEIS) (part of Discovery Historic Loop Trail); Multiuse trail; Columbia Way; VPR& C; 5.0 Mile, 14-foot-wide multiuse paved trail starting at the intersection of Columbia Way and Columbia Street and traveling east to Marine Park and Wintler Park. – permanently displaces 1,000 linear feet –underneath new Columbia River Bridges (realigns along new Columbia Way); VCPRD; City of Vancouver, State of Washington (potential federal funding pass thru – requires investigation).

2. Discovery Historic Loop Trail “(includes portion of Waterfront Trail); Multiuse Trail and City sidewalks; Columbia River Waterfront, Fort Vancouver National Historic Site, Downton Vancouver; VPR&C/NPS; 2.3 miles trail on paved multiuse paths and local streets. - 450 Linear feet impacted – (as part of Renaissance Trail and

Waterfront Park); VCPRD/NPS; funding City of Vancouver and federal funding (part of 2008 Confluence Project) *.
*Note: Should have triggered Section 106, 6(f) Evaluation but did not.

3. Fort Vancouver National Historic Site; Includes a National Historic Site, Historic District; Between Columbia River and Mill Plain Boulevard; NPS; Waterfront Park**, which NPS manages as part of the Fort Vancouver NHS, includes passive recreation, and viewing opportunities for the Columbia River and is crossed by the Columbia River Renaissance Trail.
**Note: SEIS describes, Table 3.7-4, “Approximately 0.4 acres permanently acquired” -? What 0.4 acres? Why is acquisition needed?

WHAT’S AT STAKE - COMMENTS
We have reviewed both the CRC FEIS, 2011 and IBR Program SEIS, 2024 (see the review/record) for each in the Appendices A & B) and the following comments:

Central Concern
Although, the Captain George Vancouver Monument/Park & Boat of Discovery Public Art resources are evaluated in the CRC FEIS, they are OMITTED from the IBR Programs’ SEIS.

The Captain George Vancouver (CGV) Monument was recognized in the 2011 Final EIS (FEIS) as a City Park and cultural resource worthy of consideration for impact and mitigation – Parks and Recreation 4(f) Evaluation as part of any future CRC development. However, in the 2024 IBR Draft Supplemental EIS (DSEIS), the Monument and associated greater waterfront park is NOT identified and, as such, is subject to removal and demolition without the benefit of evaluation of and/or of mitigation associated with the IBR Program Modified LPA. The DSEIS also fails to note that the location of the CGV Monument is in a city right-of-way that contains a Vancouver City Park, the CGV Monument (.4 acres – 18,730 Square Feet). Located along Columbia Street on the west side of the Columbia River Bridge and part of the Columbia River Renaissance Trail (45°37.307 N, 122° 40.434 W).

More Detailed Description of Modified LPA Facilities
The IBR Program’s Locally Approved Alternative and the CRC Locally Approved Alternatives have very similar alignments and dimensional characteristics and associated impacts on CGV Monument, Boat of Discovery and Waterfront Park. Both are designed to the west of the existing I-5 Bridge and “land” diagonally over the City of Vancouver/Columbia Shore at Columbia Street and Columbia Way. A difference is the IBR proposal is an elevated set of structures going over the railroad berm- while the CRC proposal was to continue under the railway bridge.

The issue is, with both the FEIS and SEIS, that the LPA facilities: I-5 Bridges, Shared Use Ramp, Light Rail are not described with enough detail to adequately evaluate short-term/long-term effects and mitigation on this critical Downtown Vancouver (Subarea C) landing zone (where all these facilities converge on/over the Waterfront Park/CGV Monument resources). The SEIS evaluation requires much more specific definition of alignment, supporting structures, elevations, length of ramps, size/scale of columns; construction requirements

(demolition, utilities, staging access).

Especially impactful on the Waterfront Park/CGV Monument is the Shared Use Looped Ramp (again no detail on scale, elevation change, structure, landing points). An alternative to this facility should be developed – i.e....pedestrian, bicycle, and accessible facility associated with the light rail line and station be examined). This shared use facility has a large impact on the CGV Monument/Waterfront Park landing zone and estimate it will at a significant cost to construct and operate.

More Detailed Information Needed on Acquisitions, Easements, Displacements and Land Use Agreements
Both the FEIS (Exhibit 3.7-5; narrative, page 3-198; Table 3.7.3; Table 3.7-4; Exhibit 3.7-12; narrative, pages 3-207 to 3-208; Exhibit 5.2-4; Exhibit 5.3-1; Exhibit 5.3-9; and Exhibit 5.6.1) and SEIS (Table 3.7-1; Table 3.7-2; Table 3.7-2; Table 3.7.3; Table 3.7-4; narrative, pages 3.7-16; and figure 4-1 & 4-3) describe permanent use and acquisition or realignment of facilities in this IBR landing zone area, including Waterfront Park (0.4 acres), and realignment of Renaissance and Discovery Historic Loop Trails.

Need more specific information on short-term and long-term public right-of way/property acquisitions, transfers, easements, leases, displacement and other land use agreements and the basis for them. Evaluation should be based on fully understanding the complex pattern of properties and encumbrances in this important landing zone of IBR Program facilities (need full survey and property descriptions of existing conditions (boundaries to facilities, grades, trees…). Some specific ROW/Properties/Easements/Leases/Agreements requiring more detail:

- City of Vancouver Park(s)
- City of Vancouver Street Right-of-Way
- State of Washington DOT Right-of-Way
- Columbia River – Limits and jurisdictions
- BNSF Rail Line
- National Park Service – Fort Vancouver NHS & Waterfront Park
- Port of Vancouver – (Which is shown as planning a shoreline line access to the CGV Monument/Waterfront Park)
- Clark County
- Utilities – Gas, Water, Power, Storm drainage, Sewer
- Kirkland Development – (which is shown as expanded over Columbia Way Right-of-Way)
- Other public or private development not discovered

For these acquisitions, transfers, easements, leases, displacement and land use agreements there are very few descriptions as to why they need to occur or what undertakings drive these decisions? – This background will be needed to adequately assess any such acquisition, displacement or realignment effect.

CGV Monument Parkland: We see 0 .4 acres of parkland being permanently acquired in the FEIS (in 7 FEIS document locations) but nothing in the SEIS (with exception of Table 3.7-4 Comparison of Long-Term Effects on Parks and Recreation facilities from the Modified LPA Options Chart, pages 3.7-9 to 3.7.12, Fort Vancouver NHS: Approximately 0.4 acres permanently acquired (What property and where located? Acquired for what

reason?). The purpose of this 0.4 acres of parkland acquisition is not explained in any section – other than in a long-term effects context.

Waterfront Trail: abandonment/displacement of 450 linear feet of Renaissance Trail within the IBR landing zone (under the bridges along the shore) and realign along a new Columbia Way. Again, no description as to why no 4(F) effects.

Discovery Historic Loop Trail: abandonment/displacement of 450 linear feet of the Discovery Historic Loop Trail (associated with Waterfront Trail above) within the IBR landing zone (under the bridges along the shore) and realign along a new Columbia Way. Again, no description as to why no 4(F) effects.

Other: Port of Vancouver, Fort Vancouver National Historic Site (Waterfront Park) and private development (Kirkland Development) land use, property, access agreements have been prepared in some form: Provide all agreements, MOA/MOUs, that impact these CGV Monument/Park and associated trail resources for evaluation.

Need Confirmation in Both FEIS and SEIS that the Monument is a PARK:
While the original FEIS Record of Decision does provide recognition of the Monument as a City Park - as part of not only Vancouver Waterfront Park but also the Columbia River Renaissance Trail (Waterfront Renaissance Trail); as confirmed in the INTERSTATE 5 COLUMBIA RIVER CROSSING Parks and Recreation Technical Report for the Final Environmental Impact Statement, May 2011 – Exhibit 3-3 and 3-4. In addition, the FEIS designates impacted Waterfront Park (0.4 acres), the Waterfront Renaissance Trail, and Discovery Historic Loop Trail as Section 4(f) taking.

All Waterfront Park, Renaissance Trail and Discovery Historic Loop Trail resources are Recreation assets and Require Section 4(f) Evaluation:
In hugely confusing and stark contrast from the FEIS (includes Section 4(f) Evaluations – stating (f) use, impact and mitigation), the IBR Program DSEIS (Draft), is declaring that these Park and Trail resources are not recreation – but solely transportation and thus not subject to Section 4(f) evaluation* (Contradictory). This assertion is not well supported by either the findings of the FEIS but also of 32 years of historic use as park and recreation resources; City of Vancouver park and recreation programing and maintenance; and along with the many other regional, state and national recognition of these iconic recreational, cultural, view and art resources. Not to mention the hundreds of thousands of families, visitors, and tourists that use these facilities all year round.

As stated in Section 4(f), these resources would apply to a publicly owned, shared-use path or similar facility (or portion thereof) designated or functioning primarily for recreation…" (FHWA 2012). While considered in the CRC FEIS Section 4(f) Evaluation, because the affected portion of trail is located within public right of way that is a sidewalk and functions primarily for an active transportation purpose connecting to and between downtown Vancouver, the Vancouver waterfront, and several parks in the region, and the trail would remain as a sidewalk after construction, the Columbia River Renaissance Trail is not subject to Section 4(f) (Draft Section 4(f) Evaluation | 4-17)."

The confusion may rest with the fact that the Monument/Park is part of the Columbia Street/Columbia Way right-of-way! However, in the Draft Section 4(f) Evaluation | 4-5 Supplemental 4.1.5 Summary of 2011 Final EIS

Section 4(f) Findings Where details of the CRC Final Section 4(f) Evaluation for a given property are still relevant and accurate, they have been included to support the DEIS Section 4(f) Evaluation for the IBR Program.

Visual Arts Rights Act (VARA) – Rights Afforded Jay Rood Under the Act to Protect the Captain George Vancouver Monument/Sculpture
As the artist who created the CGV Monument / Boat of Discovery Sculpture, Mr. Rood and his work are entitled to protection under the Visual Artists Right Act (VARA) of 1990. Under VARA, Mr. Rood has the right to prevent any intentional distortion, mutilation, or other modification of the CGV Monument / Boat of Discovery Sculpture as well as its intentional destruction. Mr. Rood did not waive/has not waived his rights under VARA and has not provided his permission for any IBR Program facility impacts to his work. The IBR Program SEIS Evaluation needs to record this condition in its ongoing environmental analysis, record and determinations and identify a means, a role and a schedule for Mr. Roods inclusion into this IBR Program development process.

Mr. Rood believes, and can demonstrate, that the CGV Monument/ Boat of Discovery and related Renaissance/Discovery Historic Loop Trails can be:
1) Protected in-place with careful design and structuring of IBR bridge, light rail and shared use path structures (protect during construction); or
2) If construction and other infrastructure improvements require temporary displacement/removal/storage, then these resources can be/must be rebuilt in the same locations and manner.

This design and mitigation response can also make Port of Vancouver, Waterfront Renaissance Trail, new Columbia Way, Columbia Street and Main Street connections – all focused on the Columbia River shore while expanding/extending the world-class shoreline park to the west and east of this circulation, historic, recreational, orientation, interpretive “HUB” (a new Waterfront Park). But these actions must be more carefully examined, planned, designed and implemented for this extraordinary “landing/HUB” river edge, park and recreation landscape to be a viable public space with the CGV Monument at its center.

IBR SEIS Draft Document is Inadequate, Incomplete and Contradictory Document:
Within the DSEIS there are numerous conflicting resource identifications, lack of detailed mapping, inadequate descriptions of facility impact, lack of comprehensive acquisition accounting, and lack of underlying impacts definition and therefore of mitigation response.

Captain George Vancouver Monument/Plaza and Boat of Discovery Require Protection
These contradictions and conflicts between the FEIS and the IBR DSEIS should be reconciled, and the Monument and related resources be correctly protected through the various methods and means for protection in accordance with 23 CFR 774.13(f), and as per Question 15A of the Section 4(f) Policy Paper. The SEIS requires a more comprehensive evaluation of impacts and associated mitigation related to these park and recreation resources.

These comments are directed at the CRC FEIS, 2011, and IBR SEIS, 2024, only and do not constitute support for or approval of the IBR Program and its Modified Locally Approved Alternative.

Question: What is schedule for comment response and development of the Draft IBR Program FEIS?

Thank you!

Jay Rood Evan Rood

Rood Art Works Northwest LLC
[redacted]

APPENDIX A: CRC FEIS, 2011, REVIEW

2011 FEIS (Record of CGV Monument & Boat of Discovery)
The CRC FEIS extensively records, existing conditions, impacts and mitigation associated with the Captain George Vancouver Monument, Boat of Discovery, Waterfront Park; Wave Wall Plaza; Waterfront Renaissance Trail, Discovery History Loop Trail. The FEIS establishes this resource a Section 4(f) resource.

CHAPTER 3
Existing Conditions and Environmental Consequences
Parks & Recreation Section

3.7.2 -

Exhibit 3.7-1, Parks and Recreation Facilities in the CRC Main Project Area
Existing parks and recreation facilities, Map:
Waterfront Park (CGV Monument Park); Waterfront Renaissance Trail; and Discovery Historic Loop Trail page 3-191

Exhibit 3.7-2 Parks and Recreation Facilities – Location, Jurisdiction and Amenities –
Chart, Page 3-192

Waterfront Renaissance Trail (Part of Discovery Loop Trail); Multi-use trail; Section 4 (f) impact (Use); VCPRD; Columbia Way; 14 ft wide shared use concrete trail.

Waterfront Park; Community Park; Section 4(f) Impact (Use); Columbia Way; VCPRD; Recreational par shoreline, public plaza/view areas, Boat of Discovery Monument

Exhibit 3.75 – Long-term Effect 0n Parks and Recreation Resources (LPA) –
Chart, pages 3-197 & 3-198

Discovery Historic Loop Trail (includes portion of Waterfront Trail); .4 acre of parkland permanently impacted; realignment of up to 450 linear feet of trail (portion that overlaps the Waterfront Trail); LPA Section 4(f) impact – Use

Waterfront Renaissance Trail (part of Discovery Historic Loop Trail); Realignment of up to 450 Linear feet of trail underneath existing and new I-5 bridge landing (See Discovery Historic Loop Trail Above); LPA Section 4(f) impact – Use.

Waterfront Park: 0.4 acre of parkland permanently acquired; displacement of Waves Plaza and Boat of Discovery Monument; LPA Section 4(f) impact – Use.

Exhibit 3.7-6, Permanently Impacted Portion of Waterfront Park
Photo, page 3-198
Shows photo of Monument - looking south

Associated narrative, page 3-198 “Project effects on Vancouver’s Waterfront park are likely the most substantial of all park impacts, although these are not the largest property impact. The LPA would permanently acquire the entire portion of the park that falls west of I-5 for construction of the replacement bridges. This 0.4-acre portion of the park, seen in Exhibit 3-17-6, is the west end of Waterfront Park the Waterfront Renaissance Trail that extends along the Columbia River east of I-5. The construction of the bridges at this location would displace the Waves Plaza and Boat of Discovery Monument, as well as trees and plantings surrounding and within the plaza. The Area beneath the existing I-5 Bridges would be vacated by WSDOT after bridge demolition, and then transferred to the City to use as part of their Waterfront Park redevelopment. See description in Chapter5, Final 4(f) Evaluation.”

Impacts/Effects Narrative, Pages 3-199 - 3-201
Discusses bicycle and pedestrian connections – “…benefiting Waterfront Trail, Waterfront park…”; and highway noise impacts increased due to construction on Waterfront Trail and Waterfront Park areas.

3.7.5 Mitigation or Compensation

Exhibit 3.7-12, Waterfront Park and Trail Beneath Existing I-5 Bridges
Photo, Page 3-208

Associated narrative discussing long-term impacts mitigation: Page 3-207 - 3-208

“The acquisition of a portion or Waterfront Park and the displacement of the park improvements, including the Boat of Discovery Monument, Waves Plaza and other improvements, would be mitigated through a land transfer, relocation of Boat f Discovery Monument, and other improvements for the park as described in Chapter 5, Final Section 4(f) Evaluation. The project is coordinating with the City of Vancouver to utilize vacated state right-of-way beneath the existing I-5 bridge landings in Vancouver. Tiis area would be incorporated into the City’s planned expansion of Waterfront Park (Exhibit 3.7-12). In addition, WSDOT would provide the City with use of Portions of the land under the new bridge for park and recreation use. The project would also relocate and rebuild Waterfront Trail.

…mitigation for trees removed at Waterfront Park…impacted trees would be replanted in the same or similar

locations as the trees are removed depending on the location of the original tree in relationship to the new highway location…."

CHAPTER 5
Final Section 4(f) Evaluation

Exhibit 5.2-1, Summary Information about Section 4(f) Park and Recreation Resources in the Project Area, Chart, Page 5-5

Waterfront Renaissance Trail; Multi-use Trail (part of Discovery Historic Loop Trail); Columbia Way; COV & National Park Service; 4-mile-long multi-use trail along Vancouver Waterfront; connects to Fort Vancouver and Old Apple Tree Park via the Confluence Land Bridge.

Waterfront Park; Regional Park; Columbia Way, Vancouver, WA; COV/NPS; 5 acres; passive recreation and viewing; including Captain Vancouver Monument and IIchee Status and starting point of the Waterfront Renaissance Trail.

Exhibit 5.2-3, Section 4(f) Parks and Recreation Resources: Project Area
Map, Page 5-6
1 – Waterfront Renaissance Trail
2 - Waterfront Park

Exhibit 5.2-4, Section 4(f) Parks and Recreation Resources: Project Area
Map/Photo Insert, Page 5-8
1 and 2 – Waterfront Renaissance Trail and Waterfront Park
4(f) Use – Permanent acquisition of parkland (0.4 acres), displace Boat of Discovery Monument and plaza, realign 450 lineal feet of trail.

5.2.4 The Vancouver National Historic Reserve (VNHR)
Narrative, page 5.22

The following recreational and historic built environment resources or facilities are associated with the VNHR in part or in whole and are located near the CRC project improvements:

• Discovery History Loop Trail

5.3.3 Section 4(f) Uses by the Locally Preferred Alternatives

Exhibit 5.3-1, Use of Park and Recreation Section 4(f) Resources
Chart, Page 5-27

LPA A or B; Waterfront Renaissance Trail; Paved Multimodal public path; permanently realigns approximately 450 Linear feet of trail underneath existing and future proposed I-5 bridges. Based on CFR 774.17, a Section 4(f) use.

LPA A or B; Waterfront Park; Recreational Park shoreline and public plaza/view areas; Acquires .4 acres (18,730 sq. ft.) of park land; displaces plantings, waves plaza, and Boat of Discovery Monument. Based on CFR 774.17, a Section 4(f) use.

5.6.1 Factor (i) Ability to Mitigate Adverse Impacts to Section 4(f) Resources, Including Any Measures that Result in Benefits

The LPA (and Alternatives 2 and 3)
Narrative, Page 5-87

Other Section 4(f) mitigation measures incorporated into the LPA include the Following:

• Realign and rebuild Waterfront Trail in coordination with the City of Vancouver's on-going planning to redevelop and expand Waterfront Park.
• Provide improved access, use of right-of-way for ball courts and other recreational activities, site re-grading, vegetation and other improvements to help the City of Vancouver implement its proposed Waterfront redevelopment.

Exhibit 5.3-9, Waterfront Renaissance Trail and Waterfront Park
Map, Page 5-41
Map shows acquisition boundaries:

"Waterfront Park – As illustrated in Exhibit 5.3-9, the new I-5 bridges over the Columbia River would travel over the portion of Waterfront Park located on the west side of the existing I-5 bridges. This portion of the park, which is in the City of Vancouver right-of -way adjacent to Columbia Way, acts as the entrance to the larger Waterfront Park and Waterfront Renaissance Trail, and includes a plaza and public art. The project would permanently acquire this entire area, approximately 0.4 acres, and displace the Boat of Discovery Monument and Waves Plaza. This permanent property acquisition constates 9Percent of the 5-acre Waterfront Park and would constitute a Section 4(f) use."

"Waterfront Renaissance Trail (part of the Discovery Historic Loop Trail) – The Waterfront Renaissance Trail is located in Waterfront Park, Columbia Way on the Vancouver riverfront. As illustrated in Exhibit 5.3-9, approximately 450 feet of the trail would be realigned due to the construction of the new I-5 bridges and demolition of the existing bridges. This length of impacted trail constitutes less than 5 percent of the existing Waterfront Trail and would constitute a Section 4(f) use.

Access to this trail from I-5 - … The LPA would include a new multi-use path within the northbound I-5 bridge, which would connect to Waterfront Park and Trail via a looped path that would travel underneath the bridges..."

Interstate Bridge Replacement Program – Draft SEIS, September 20, 2024

The September 20, 2024, SEIS anlayis of the Preferred Locally Proposed Alternative does not address, evaluate or record any aspect of the Captain George Vancouver Monument, Boat of Discovery, Wave Wall Plaza or Waterfront Park that it is a part of - with the exception of the Waterfront Renaissance Trail.

Figure 3.3-3 Detail of Property Acquisitions in Downtown Vancouver
Does not Identify Waterfront Park
Entire area under/around bridge landing is shown as “Permanent Impact Footprint”? No delineation of park land acquisition (says 0)

5-12 – Summary – what are the effects of the Modified LPA

Table 4, Summary of Mitigation or Compensation for Community and Environmental Effects
Page S-36
Parks and Recreation
Long – Term Effects
There is NO description of effects on Waterfront park, George Vancouver Monument/Boat of Discovery.
Impacts on trees and landscape are discussed.

Visual Quality
Long – Term Effects
There is NO description of effects on Waterfront park, George Vancouver Monument/Boat of Discovery.
General Mitigation
Vancouver Downtown Landscape Unit
Not directed to Monument/Boat of Discovery – directs follow design guidelines; provide landscaping, public art, and other treatments

Section 4(f) Resources
Page S-59
Comply with CFR 774.17 (Which this SEIS is not)
States, “No program specific measures are proposed for long-term or temporary effects related to Section 4(f) resources beyond those prosed in Parks and Recreation” (see above – only trees and landscape)

2.2.4 Downtown Vancouver (Subarea C)
Highways, Interchanges and Local Roadways
Figure 2-23, Downtown Vancouver (Subarea C) and Narrative
Pages, 2-38, 2-39 Chapter 2
Map shows proposed IBR Program facilities: new I-5 bridges, light rail line/station and circular shared use path off of bridges to Columbia Street/Columbia Way. Does NOT show existing Waterfront Park (Captain George Vancouver Monument/boat of Discovery Sculpture Plaza/Park). Shows a realigned Columbia Way – but with no description
A light-rail station is described as 35’ - crossing over the BNSF railroad tracks – be 75’ above existing ground level – accessed by stairway(s) and elevator(s)

3.7 Parks and Recreation

Table 3.7-1. Comparison of CRC LPA Effects and IBR Modified LPA Effects
Chart, page 3.7-1

Total Acres of Park and recreation resources acquired:
CRC LPA – 4 Acres
IBR MLPA - .08 Acres
Reduction in total acres acquired is primarily the result of reduced impacts to Fort Vancouver National Historic Site, waterfront Park, Discover Historic Loop Trail and Clark College.

Note: There is NO mention of the CGV Monument, Boat of Discovery, Monument Park/Plaza….

Figure 3.7-1 Parks and Recreation facilities in the Study Area
Map, Page 3.7-3
Shows generalized locations of parks, including Waterfront Park, Waterfront Renaissance Trail and Discover History Loop trail

Table 3.7-2 – Parks and Recreation facilities – Location, Jurisdiction and Amenities
Chart, page 3.7-5

Columbia River Renaissance Trail (part of Discovery Historic Loop Trail); Multiuse trail; Columbia Way; VPR&C; 5.0 Mile, 14-foot-wide multiuse paved trail starting at the intersection of Columbia Way and Columbia Street and traveling east to Marine Park and Wintler Park.

Fort Vancouver National Historic Site; Includes a National Historic Site, Historic District; Between Columbia River and Mill Plain Boulevard; NPS; Waterfront Park, which NPS manages as part of the Fort Vancouver NHS, includes passive recreation, and viewing opportunities for the Columbia River and is crossed by the Columbia River Renaissance Trail.

Discovery Historic Loop Trail (includes portion of Waterfront Trail); Multiuse Trail and City sidewalks; Columbia River Waterfront, Fort Vancouver National Historic Site, Downton Vancouver; VPR&C/NPS; 2.3 miles trail on paved multiuse paths and local streets.

Note: There is NO mention of the CGV Monument, Boat of Discovery, Monument Park/Plaza….

Table 3.7.3 Long Term Benefits and Effects - MLPA
Chart, pages 3.7-7, 3.7-8

Columbia River Renaissance Trail (co extensive with Discovery Historic Loop Trail along affected portion).
• Realignment of up to 1,000 linear feet of the trail underneath new Columbia River bridges landing (see Discovery History Loop trail below).
• Traffic Noise to slightly decrease

Table 3.7-4 Comparison of Long-Term Effects on Parks and Recreation facilities from the Modified LPA Options
Chart, pages 3.7-9 to 3.7.12

Discovery Historic Loop Trail (includes portion of Columbia River Renaissance Trail):
• Realignment of up to 2,750 Linear feet of trail (1,000 linear feet overlaps with Columbia River Renaissance Trail)
• Improved Visitor experience from new and improved intersections, sidewalks and bicycle lanes in Downtown Vancouver portion

Fort Vancouver NHS.
• Approximately 0.4 acres permanently acquired (WHAT 0.4 ACRES ACQUIRED? – SEIS SAYS 0.0 ACRES ACQUIRED?)
• Traffic Noise could increase
• At waterfront Park, changes in in western and southern views due to new Columbia River bridges.

Narrative, Page 3.7-16
Columbia River Renaissance Trail
• Permanently realign 1,000 linear feet
• M LPA would include a multiuse path that would extend underneath the northbound Columbia River Bridge and connect directly to the trail along the realigned Columbia Way

Discovery Historic Loop Trail.
• Would permanently realign up to 2,750 Linear feet of trail (1,000 linear feet overlaps with Columbia River Renaissance Trail)

4. DRAFT SECTION 4(F) EVAULATION
4.2.1 Section 4(f) Park and Recreation Properties in the IBR Program Study Area

Table 4-1. Summary Information about Section 4(f) Park and Recreation Properties in the IBR Program Study Area
Chart, pages 4-8 to 4-10

The chart has no information regarding Waterfront Park, Captain George Vancouver Monument, Boat of Discovery, Wave Wall Plaza or any other related element.

It also does not describe any properties associated with the Columbia River Renaissance Trail, Discovery Historic Loop Trail or National Park Services Waterfront Park/Waterfront Renaissance Trail (along the

Columbia River – south of Columbia Way).

Figure 4-1, Section 4(f) Park and Recreation Properties: IBR Study Area
Map, page 4-11
Delineates IBR study area – but although the Waterfront Park, Captain George Vancouver Monument, Boat of Discovery, Wave Wall Plaza or any other related element sits within the study area – no designation is shown.

An inset map does designate the Waterfront Renaissance Trail as part of the Fort Vancouver National Historic Site boundary. Shown here but not delineated in Table 4-1.?

Figure 4-3. Section 4(f) Park and Recreation Properties: Fort Vancouver National Historic Site
Map, page 4-13

Shows graphically, that the renaissance trail thru the Waterfront Monument Park is realigned – now wholly along a new aligned Columbia Way connecting to Columbia Street and Port development to the west. Also, a circular looped pathway is shown off of the new IBR bridges connecting to Columbia Street/Columbia Way intersection.

Columbia River Renaissance Trail (Formerly referred to as Waterfront Renaissance Trail (? When did this change? By whom?)
Narrative, page 4-17
"The Columbia River Renaissance Trail is a 5-mile long, 14-foot-wide multiuse paved trail starting at the Intersection of Columbia Way and Columbia Street and extending east… Connects Vancouver Downtown to the Columbia River Waterfront… The Columbia River Renaissance Trail is a portion of Discovery Historic Loop Trail (NPS – Federally Funded?) and connects to the FVNHS. The portion of the trail in the study area is designated along the public sidewalk on the southside of Columbia Way. After construction is complete, the trail and Columbia Way would be realigned and reconstructed. The new constructed portion of trail would continue to be located in City of Vancouver right-of-way for Columbia Way.

In accordance with 23 CFR 774.13(f), and as per Question 15A of the Section 4(f) Policy Paper, "section 4(f) would apply to a publicly, shared use path or similar facility (or portion thereof designated or functioning primarily for recreation…" (FHWA 2012). While considered in the CRC Final 4(f) evaluation, because the affected portion of the trail is located within public right-of-way and functions primarily for an active transportation purpose connecting to and between downtown Vancouver, The Vancouver Waterfront, and several parks in the region, and the trail would remain as a sidewalk after construction, The Columbia Rover Renaissance Trail is not subject to Section 4(f)."

Discovery Historic Loop Trail
Narrative, page 4-17

"The Discovery Historic Loop Trail is a 2.9-mile trail that connects the Fort Vancouver NHS and VNHR with the Vancouver waterfront and downtown. The trail is located within and is a feature of the FVNHS Park for much of its extent. It also overlaps with the Columbia River Renaissance Trail; it is not counted as a separate

recreational property. The trail follows sidewalks on local streets in downtown Vancouver outside of FVNHS and Renaissance rail. While considered in the CRC Final Section 4(f) Evaluation, per 23 CFR 774.13 (F)(4), trails that are part of a local transportation system and function primarily for transportation, such as the Discovery Historic Loop Trai, are subject to Section 4(f) approval."

Figure 4-39. IBR Program Modified LPA Improvements in Relation to VNHR Historic District
Map, page 4-109

Shows again realigned Columbia River Renaissance Trail along a new Columbia Way and the development of looped pathway off of the bridges to the Columbia Street/Columbia Way intersection. No indication of a Waterfront Park/Monument Plaza connection.

IBR Draft SEIS - RECORD #2161 DETAIL

First Name :	William
Last Name :	Sobolewski
Attachments :	DSEIS-2161_Sobolewski_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2161 DETAIL

Submission Date :	11/17/2024
First Name :	William
Last Name :	Sobolewski
Business/Organization/Agency :	

Submission Input :

Keep the existing bridge in place..retrofit it for earthquakes..build a third bridge upstream

IBR Draft SEIS - RECORD #2162 DETAIL

First Name :	Janice
Last Name :	Christopherson
Attachments :	DSEIS-2162_Christopherson_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2162 DETAIL

Submission Date : 11/17/2024

First Name : Janice

Last Name : Christopherson

Business/Organization/Agency :

Submission Input :

While I don't doubt that the bridge needs to be at a minimum retrofitted due to its age; a new bridge is not the solution to traffic congestion on I-5 thru Vancouver and Portland. What would make more sense is a 3rd route across the Columbia River for traffic, especially truck traffic, that does not need to be in the Portland/Vancouver area. Also, tolling needs to be addressed. I don't have a problem with tolling on NEW construction but tolling on existing structures, such as I-205 is not acceptable.

IBR Draft SEIS - RECORD #2164 DETAIL

First Name :	Meagan
Last Name :	Hager
Attachments :	DSEIS-2164_Hager_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2164 DETAIL

Submission Date : 11/17/2024

First Name : Meagan

Last Name : Hager

Business/Organization/Agency :

Submission Input :

The IBR is an insufficient product. 1) It doesn't meet the Coast Guard's minimum deck height requirement for port traffic. The bridge should meet the minimum federal guidelines. 2) It doesn't reduce traffic congestion for the 75,000 Vancouver commuters every day, much less the commerce traffic in the I-5 corridor. I would like to see additional mitigation for vehicle traffic, such as additional lanes. 3) It is a bad deal for the tax payer, with the most expensive light rail addition in the world. Additional consideration should be made toward the cost/benefit of light rail. Will ridership fees pay for the use and maintenance of the rail and cars? 4) Washington has repeatedly voted down light rail to our Vancouver community, this is against the will of the people. Finally, additional consideration should be made toward the impact of tolls on low to middle-income families. The most expensive tolling option will cost these families $2,350 a year. Please consider whether the cost of this insufficient project is actually worth it. In my mind, no it is not.

IBR Draft SEIS - RECORD #2165 DETAIL

First Name :	Mariah
Last Name :	Linden
Attachments :	DSEIS-2165_Linden_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2165 DETAIL

Submission Date :	11/17/2024
First Name :	Mariah
Last Name :	Linden
Business/Organization/Agency :	N/A

Submission Input :

Don't waste more of our money that your organizations only miss use. No on Your bridge, No one your toles.

IBR Draft SEIS - RECORD #2166 DETAIL

First Name :	Karen
Last Name :	Gibson
Attachments :	DSEIS-2166_Gibson_Original.pdf (3 kb)

IBR Draft SEIS - RECORD #2166 DETAIL

Submission Date : 11/17/2024
First Name : Karen
Last Name : Gibson
Business/Organization/Agency :

Submission Input :

I am concerned about the impact on our property values and quality of life during construction of the IBR, .

The Interstate Bridge is very much in need of replacement. The first iteration, the CRC, failed, to the detriment of everyone. It was wise to restart the project, and wise to re-use as much of the previous work to speed the process along. The restart of this project has a direct impact on my home, my property values, and my quality of life.

We purchased our home well after the failed CRC, and well before the restart and IBR. Since the restart of IBR I have been vocal about needing real representation for all of us who live within the program area, and directly next to the freeway and where construction will occur.

I was informed by a representative of the Interstate Bridge Project that there is currently no official legal requirement to provide compensation for any impacts a homeowner may/could/would/will experience due to construction of IBR, if the property has not been identified for right-of-way acquisition (ROWA).

I was informed that my question regarding the impacts on homeowners not targeted for ROWA to property values and quality of life during construction of IBR will be logged as a public comment and that I will learn the outcomes in the Final Decision Environment Impact Statement FDEIS, slated for Fall 2025.

Homeowners, some for whom this project did not exist when they purchased their home, get to spend upwards of a year wondering what becomes of their lives, while pondering the impacts from the months-to-years of daily, ongoing, heavy construction occurring up to 100ft from their home, and the homeowner may get zero compensation, and incur any costs to prevent and/or address these impacts? Unacceptable!

Our financial health includes the property value of our home. What happens to property values once construction begins? What about families who must sell, and see their property value has dropped because of IBR? Situations such as this will be happening -to- homeowners, outside of their control.

What about property values due to the multiple impacts of anything from construction vibration, to toxic construction dust, due to heavy construction taking place daily right outside front doors? What of risk for loss of use from ongoing construction? Vibration from construction could cause foundation and structural damage. Contaminated and filthy toxic construction dust could get into homes, daily, and seep into everything in the home. Unable to open windows, use AC, do anything that pulls air into the home, in order to keep toxic dust from entering the home.

Trees and landscape will be covered in toxic dust. People will be unable to grow herbs and vegetables in their soil. People won't be able to use their homes for entertaining. The quality of life will go down. People are faced with years of living less than our best life experience due to the this project.

Then there is the costs of cleaning the inside air (air filters), and cleaning the entire home, inside and outside (power washing, cleaning services), replacing/addressing soil in gardens, containers, and raised beds; as well as loss of use due to construction - all because it was decided to restart the project.

I was told IBR will inform us via the Final Decision Environmental Impact Statement, slated for Fall 2025. Until then what plans are in place by IBR to have specific discussions with impacted neighborhoods and/or homeowners and get their input and buy-in, and actually layout a fully funded detailed plan that alleviates these concerns sooner rather than later?

IBR Draft SEIS - RECORD #2167 DETAIL

First Name :	Jessica
Last Name :	Vaughan
Attachments :	DSEIS-2167_Vaughan_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2167 DETAIL

Submission Date :	11/17/2024
First Name :	Jessica
Last Name :	Vaughan
Business/Organization/Agency :	

Submission Input :

Please do not expand the existing bridge and add more single car occupancy lanes - this never leads to alleviation of congestion (see case studies everywhere). Instead focus on light rail, bus, bike, and pedestrian use - this is the only way to reduce congestion and greenhouse gases. Think Tillicum crossing across I-5 that is dedicated to these other uses. Ever expanding rail increases ridership and access for many, while greatly reducing emissions - one of our city's key goals.

IBR Draft SEIS - RECORD #2168 DETAIL

First Name :	Peter
Last Name :	Banka
Attachments :	DSEIS-2168_Banka_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2168 DETAIL

Submission Date :	11/17/2024
First Name :	Peter
Last Name :	Banka
Business/Organization/Agency :	

Submission Input :

This project is too big and overreaching. Yes, we need a new bridge. No, we don't need all these expensive interchanges. Let's do the minimum required so that we don't all die from Cascadia and then move on with our lives. Ideally, we would expand light-rail and cycling to Washington, but our friends across the river hate us, so that's probably off the table. Let's just build a minimum bridge.

IBR Draft SEIS - RECORD #2169 DETAIL

First Name :	Karen
Last Name :	Gibson
Attachments :	DSEIS-2169_Gibson_Original.pdf (2 kb)

IBR Draft SEIS - RECORD #2169 DETAIL

Submission Date : 11/17/2024
First Name : Karen
Last Name : Gibson
Business/Organization/Agency :

Submission Input :

I am concerned about the Construction Impacts of Noise Wall 8 on our neighborhood.

Noise Wall 8 is absolutely necessary for noise mitigation and should not be removed from the Final Decision Environmental Impact Statement.

I am concerned about the tear down of tree/landscape, old walls and fences to construct and install the new noise wall within 100 ft of our neighborhood streets and park. It is imperative that those most directly impacted are made well aware of what their daily lives will be like during the years of construction.

There is no detailed, combined, discussion on the impacts the neighborhood can expect to health, property, and soil from toxic dust. What information exists is spread across multiple technical reports, and do not take a holistic view of issues.

There are no design specifics - the type of wall, visual renderings of what the wall looks like in the neighborhood. There has been no education on noise wall technology and what options exist.

When construction begins there will be dust and noise all day long. Toxic construction dust spreading though the air and into neighborhood homes will prevent the community from having open windows, enjoying patios and front porches, preventing the use of air conditioning, clogging air filters.

Neighbors with asthma and respiratory conditions could experience more impacts, and other neighbors could acquire these conditions due to the construction dust.

Months of dust build-up on the exterior of homes, patios, porches - but no details on who pays for prevention and clean up. Toxic dust getting into the soil is not mentioned at all in the SDEIS - and that soil is used in neighborhood gardens to grow food.

Trees are the one thing that purifies air pollutants. Taking down all the trees and vegetation to build the noise wall removes the one thing that addresses the terrible air quality for neighborhoods next to the freeway, yet there is no details or discussions regarding steps to address this loss of tree-scape.

Taking early action to make design decisions that allows new trees to be planted well before construction, so they can add air purifying benefit now, and be ready to provide air purifying benefit after completion of the noise wall, should be considered - through direct discussions with impacted neighborhoods/homeowners living within the program area and next to noise wall locations.

IBR Draft SEIS - RECORD #2170 DETAIL

First Name :	Karen
Last Name :	Gibson
Attachments :	DSEIS-2170_Gibson_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2170 DETAIL

Submission Date : 11/17/2024
First Name : Karen
Last Name : Gibson
Business/Organization/Agency :

Submission Input :

I want Noise Wall 8 to work in harmony with the beauty of the PNW, and our neighborhood.

The noise wall should work in harmony with the beauty of the PNW. The project should consider designs such as making the noise wall a huge living wall - with such ideas as planters on the walls, with trees and other air purifying plants.

The wall should reflect the history of the Arnada Neighborhood, downtown Vancouver, and the Columbia River we live next to.

Not every new noise wall needs to be just a concrete slab.

IBR Draft SEIS - RECORD #2171 DETAIL

First Name :	Karen
Last Name :	Gibson
Attachments :	DSEIS-2171_Gibson_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2171 DETAIL

Submission Date : 11/17/2024
First Name : Karen
Last Name : Gibson
Business/Organization/Agency :

Submission Input :

I am concerned about the use of chemicals that might be used for ‘fugitive dust’ mitigation, as referred to in the Air Quality Technical Report, on our neighborhood and Noise Wall 8.

I am concerned about the use of chemicals that might be used for ‘fugitive dust’ mitigation, as referred to in the Air Quality Technical Report. There is no discussion about the impacts to the neighborhood from the use of these chemicals, neither short-term nor long-term impacts.

I want experts to explain in writing how these mitigation measures allow us to live safely in our home during months to years of construction occurring up to 100ft from our home. This information should be specific to our neighborhood, not a general overview.

I want to hear from and ask questions to health specialists who understand these chemicals and their impacts.

I read the types of chemicals used for ‘fugitive air’ - that toxic construction dust - mitigation. I want to understand how these chemicals impacts my health and what it does to our soils and surroundings. I want to know the trade-offs of using non-chemical solutions to address ‘fugitive dust’. I want to have input in whether chemicals are used as a mitigation measure for toxic construction dust.

IBR Draft SEIS - RECORD #2172 DETAIL

First Name :	Karen
Last Name :	Gibson
Attachments :	DSEIS-2172_Gibson_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2172 DETAIL

Submission Date : 11/17/2024
First Name : Karen
Last Name : Gibson
Business/Organization/Agency :

Submission Input :

I want to see the specific and funded plan for and increase in planted trees and landscaping surrounding the new noise wall 8 in our neighborhood. Trees, especially conifers, clean the air and should be used to create a ‘higher’ wall to capture the exhaust from car traffic that will be not reduced, and looks to increase, after completion of the project. I want IBR to begin planting the trees well sooner than construction begins so the trees can start benefitting now, and be ready when the new wall is completed.

IBR Draft SEIS - RECORD #2173 DETAIL

First Name :	Karen
Last Name :	Gibson
Attachments :	DSEIS-2173_Gibson_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2173 DETAIL

Submission Date : 11/17/2024
First Name : Karen
Last Name : Gibson
Business/Organization/Agency :

Submission Input :

I am concerned about the use of our Arnada neighborhood park during various phases of the IBR project.

I am concerned about limited use of the park, especially the playground, multiple times, either as a construction storage site, or when the overpass is rebuilt, and when the noise walls are built.

We will lose partial access to our local park for construction needs, and during noise wall construction, and any soil impacts from toxic construction dust, for months to years during construction. Many young children will not see ‘their park’ for several years. Having a new park to return to will be a benefit for years to come.

I want IBR to help in creating a reimagined Arnada park that offers play options for everyone, with a rebuilt gazebo, a rebuilt basketball area, and a beautiful new green space for play.

IBR Draft SEIS - RECORD #2174 DETAIL

First Name :	Karen
Last Name :	Gibson
Attachments :	DSEIS-2174_Gibson_Original.pdf (4 kb)

IBR Draft SEIS - RECORD #2174 DETAIL

Submission Date :	11/17/2024
First Name :	Karen
Last Name :	Gibson
Business/Organization/Agency :	

Submission Input :

I am concerned about the ability to use the Active Transportation multi-modal bridge walkway for those who are older or deal with health conditions.

There is no mention of an elevator up to the bridge walkway, but there is mention of an elevator for access to the proposed MAX stop at the Waterfront. Why does the community not benefit from riding up in an elevator (glass elevator?) to the Bridge Walkway?

I want elevator access to the top of the multi-modal active transportation ‘racetrack’ oval to access the bridge walkway. People with health conditions could find the elevation walk impossible to complete. This deny’s access for the disabled, the elderly, those who do not bike or ride scooters, and those who just don’t want to walk up that oval. It certainly does not meet any equity criteria.

IBR Draft SEIS - RECORD #2175 DETAIL

First Name :	Patricia
Last Name :	Neighbor
Attachments :	DSEIS-2175_Neighbor_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2175 DETAIL

Submission Date :	11/17/2024
First Name :	Patricia
Last Name :	Neighbor
Business/Organization/Agency :	

Submission Input :

The Vision and Values, under Community Livability, should include recognition- through the design of the project- of the historic ecological and community context- bringing the site into greater alignment with where it was before industrial development when integrated with the lives of the people who lived there. I support the development of active transportation facilities and bike parking that are safe, comfortable and attractive, designed to highlight the particular aesthetic qualities of the site including the westward view, and built in tandem with other transportation facilities. Facilities in Copenhagen provide examples.

IBR Draft SEIS - RECORD #2176 DETAIL

First Name :	Gillian
Last Name :	Wallis
Attachments :	DSEIS-2176_Wallis_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2176 DETAIL

Submission Date :	11/17/2024
First Name :	Gillian
Last Name :	Wallis
Business/Organization/Agency :	Columbia Fourth Building LLC

Submission Input :

I am writing in regards to the planned acquisition by the IBR of the Historic Lucky Lager building located at 215 W 4th Street in downtown Vancouver. In the recently published SEIS, the building is shown to be acquired (as one of three options) for a parking garage for light rail. The other two options for the garage are located on vacant or relatively vacant land nearby.

My husband and I purchased this building in 2007 and updated it into a modern office building. I urge the IBR not to tear down a historic building, fully occupied by six commercial tenants and about 80 employees, to build a parking garage. It is the height of absurdity to build any parking garages downtown, and even more absurd to choose to tear down a working, historic building instead of using vacant or near-vacant land instead.

During the last iteration of this project, the CRC also had our building listed for acquisition for a parking garage. Since that time there have been several large parking garages built in the nearby waterfront. Do we really need more parking garages downtown? We urge the IBR to act reasonably and take this building off of the SEIS acquisition list.

IBR Draft SEIS - RECORD #2177 DETAIL

First Name :	Mary Sue
Last Name :	Renfrow
Attachments :	DSEIS-2177_Renfrow_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2177 DETAIL

Submission Date :	11/17/2024
First Name :	Mary Sue
Last Name :	Renfrow
Business/Organization/Agency :	

Submission Input :

This is too big. Why is this project, in a warming climate, in a housing crisis, with the vast knowledge of how freeways negatively impact the health of the communities they travel through, focusing on moving more individual vehicles through at the expense of our neighborhoods? Why is there less planning for robust public transit in this model, when that is a goal of all the agencies feeding into this project?

This should be scrapped and we should be prioritizing a more efficient project with greater public transit enhancements, and active transportation before expanding a freeway. Bridgetown deserves better, safer bridges, not wider, polluting highways that sicken us all.

IBR Draft SEIS - RECORD #2178 DETAIL

First Name :	Joan
Last Name :	Nichols
Attachments :	DSEIS-2178_Nichols_Original.pdf (2 kb)

IBR Draft SEIS - RECORD #2178 DETAIL

Submission Date : 11/17/2024
First Name : Joan
Last Name : Nichols
Business/Organization/Agency :

Submission Input :

I am committed to a bridge replacement. I have scanned the Executive Summary and read in more detail certain portions of the summary including some of the appendixes.

We need to prioritize seismic safety, and traffic safety/ movement on the bridge, with one or two auxiliary lanes. Rapid transit train services, supported by incentives for its use, and safe and more healthy pedestrian, bicycle, and wheel chair routes should be another priority. (Credits toward tolls might be offered to those who use public transit, wheel, or walk across the bridge.)
Improvement of the water, air, and soil around this site is a particularly important consideration.
If a bridge with a movable portion design is chosen, maritime navigation should only be allowed during the night.
Imposition of tolls prior to the completion of the bridge, as well as after the bridge is completed, should be lifted at certain times of the 24 hours of the day, to those using public transit or their own power (walking or rolling) (through no increase in regular fare for bus or train riders), and at a reduced level prior to the bridge's completion.
Displaced businesses and homeowners should have priority access to any local, state, or federal monies devoted to business and housing access.
Environmental mitigations included in the report should be followed.
Personally, I would happily use the bicycle lanes and public transit, rather than my own vehicle as much as possible for trips from Vancouver to Hayden Island or Portland and beyond.

IBR Draft SEIS - RECORD #2179 DETAIL

First Name :	Mark
Last Name :	Knowles
Attachments :	DSEIS-2179_Knowles_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2179 DETAIL

Submission Date :	11/17/2024
First Name :	Mark
Last Name :	Knowles
Business/Organization/Agency :	

Submission Input :

NO CRIME RAIL! Clark County does not need or want the Tentacles of Portland Oregons Crime Rail Infesting our Community.

IBR Draft SEIS - RECORD #2180 DETAIL

First Name :	Bob
Last Name :	Cavanaugh
Attachments :	DSEIS-2180_Cavanaugh_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2180 DETAIL

Submission Date :	11/17/2024
First Name :	Bob
Last Name :	Cavanaugh
Business/Organization/Agency :	

Submission Input :

I would prefer the double deck option to give even more separation between vehicles and pedestrians.

IBR Draft SEIS - RECORD #2181 DETAIL

First Name :	Natalie
Last Name :	Richards
Attachments :	DSEIS-2181_Richards_Original.pdf (3 kb)

IBR Draft SEIS - RECORD #2181 DETAIL

Submission Date :	11/17/2024
First Name :	Natalie
Last Name :	Richards
Business/Organization/Agency :	Retired PE and PMP

Submission Input :

I did not have time to read 2575 pages but tried to delve into the summary and what I think are the critical issues. Thank you for this comprehensive Draft EIS:

1) Page 22- Please reference this height comparison page 148 "raised the maximum vertical navigation clearance of the bridge from 95 feet to 116 feet and a second in 2013 that evaluated a phased construction approach)." It took me until page 148 to understand the relevance of the height.

2) page 24 Please add the projected traffic volume the new bridge is being designed for. Is it 378,000? Truck volume 21000 to 24500?

3) page 25- can CTRANS quantify "substantially"?- "Travel times for public transit using general purpose lanes on I-5 in the Program area are expected to increase "substantially" by 2030".

4) Page 28- again reference pg 148- " 116 feet of vertical navigation clearance, and the movable-span configuration would provide 178 feet of vertical navigation clearance in the open position."

5) Page 30- will there be concurrent construction of the 6 new bridges? If so how?

6) Page 34-again add page 148 reference for perspective.

7) page 35 and page 50-"some current users would not be able to pass under the bridges due to height unless" What can not pass is not clear to the reader-fabricators Greenberry? Transco? Tow boats with barges holding wheat from Snake river area?

8) pg 36 "require more than 116 feet - Bridge height would exclude up to eight existing users" (see page ? for who is impacted?)

9) page 40-41 and 43-VTM and MSAT, EMF mean what?

10) Page 67 and page 333, 337- "Operate construction equipment from on top of floating barges." " A temporary construction navigation envelope (height and width of unobstructed clearance for navigation) would be maintained during construction with a minimum clearance of 72 feet (vertical) by 150 to 200 feet (horizontal). During times when these minimum clearances are in effect, vessels requiring more than 72 feet of vertical navigation clearance would be unable to pass under the bridges" "the IBR Program would conduct outreach to businesses in areas with high volumes of freight traffic to determine access and site circulation needs" How will existing river users navigate during construction barge construction operations? Will there be 2 week in advance notification? An application process to move through the site(s)? How do you avoid a river traffic jam?

11) page 155- vertical lift- when I searched for "cost estimate" I could only find the overall. I could not find the estimated cost per alternative. My hope is that the Vertical lift would not be implemented. But what would prevent it?

11.5) Page 158- please show the existing bridge 178 elevation in figure 2-22

12) Page 897-Figure 4-30-How come the survey resources are not at the proposed west shift bridge site? Also how much is the "west" shift in feet?

13) Starting at 1019- Appendix C- I find the naming convention hard to understand. The 1st drawing is of the Expo, 2nd- MLK, 3 N. Portland Harbor etc.. but you really have to search the tiny print to know where you are. And the sheet title does not tell you. page 1023- add Columbia River. Page 1027- is this 39th street and 500? Page 1028-9- Title of sheet discusses a west shift. How much west shift is there. Page 1046- Its hard to compare impacts- for example pages 1037 to 1048. A side by side comparison would help the reader. Or one

alternative impacts superimposed on the other.
General comments-a) I searched for Contractor screening- And only found Navigation safety and staging site. Has the contractor already been selected? If not, how is the contractor(s) being screened? selected?
b) is there geotechnical information for every proposed drill shaft/pier location? As I mentioned at the Clark College open house, I'm very concerned about the design build process and how the unknown risks would be addressed up front to avoid cost overruns which affect what the public would pay in tolling.

Natalie Richards, PE PMP

IBR Draft SEIS - RECORD #2182 DETAIL

First Name :	Mark
Last Name :	Fritzen
Attachments :	DSEIS-2182_Fritzen_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2182 DETAIL

Submission Date : 11/17/2024

First Name : Mark

Last Name : Fritzen

Business/Organization/Agency :

Submission Input :

Build a new bridge at a less busy area in the river. The costs of rebuilding I-5 will be exorbitant! It will be incredibly disruptive and it will cost several times the estimates and it take much longer to complete. Disrupting the river bed, animal habit and nearby environment, will be beyond your estimates!

IBR Draft SEIS - RECORD #2183 DETAIL

First Name :	Mike
Last Name :	Coleman
Attachments :	DSEIS-2183_Coleman_Original.pdf (2 kb)

IBR Draft SEIS - RECORD #2183 DETAIL

Submission Date : 11/17/2024
First Name : Mike
Last Name : Coleman
Business/Organization/Agency :

Submission Input :

Please choose to build two northbound auxiliary lanes on the new bridge. The “Bottlenecks and Speed Summary” (figures 4-9 through 4-16) tells the story. So does the Origin-Destination Patterns (figures 3-9 and 3-10).
The MLPA is barely any better than the No Build/Existing conditions scenario when it comes to serving freeway traffic. Why build a project that retains a bottleneck that can’t keep up with the I-405 bottleneck?
Without the two auxiliary lanes, the Portland neighborhoods along I-5 would continue to suffer the same impacts they have suffered for decades. Anything less than two auxiliary lanes would amount to perpetuating an injustice the neighborhoods have suffered ever since the freeway bottlenecks began. According to the arterials Screenline Analysis and the freeway Bottlenecks and Speed Summary, during all hours when the freeway is “red,” any future traffic increases will need to be served by the parallel neighborhood surface streets. (The screenline analysis only looks at peak hour volumes. The analysis should consider all the hours when the freeway is “red.)”
Per the Origin-Destination Patterns (figures 3-9 and 3-10), being a river crossing, the bridge needs to not only serve the freeway through traffic. It needs to effectively serve the immediate area where, without the river, a more complete roadway network would have been in place.
The immediate areas on both sides of the river need reasonable access across the river, access that the auxiliary lanes would provide.

Please solve the proposed Marine Drive interchange. Why propose an inadequate concept? Hard to understand such an inadequate design would be proposed. Even harder to understand why the draft SEIS does not address this glaring shortcoming more thoroughly.
Tables 4-32 and 4-33 conclude that the proposed interchange will perform more poorly than the No-Build option. The tables show the interchange will not meet standard during the am or pm peak hours. Surely these conditions will be occurring for multiple hours in the morning and afternoon.
Assuming a successful solution is developed, what if it has a negative ripple effect on the various EIS evaluation criteria? How do you get to a final EIS without another public review period?
The CRC solution included a follow up project to add an EB-to-NB flyover ramp. Why was it not even acknowledged and analyzed by the IBR team?

IBR Draft SEIS - RECORD #2184 DETAIL

First Name :	Maggie
Last Name :	Mogollones
Attachments :	DSEIS-2184_Mogollones_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2184 DETAIL

Submission Date :	11/17/2024
First Name :	Maggie
Last Name :	Mogollones
Business/Organization/Agency :	

Submission Input :

Una vez terminado el proyecto que es muy costoso me gustaría saber de que forma se van a mantener en un futuro estos puentes, es posible que tengamos que pagar un peaje cada vez que pasemos a Vancouver o Portland.

[English translation] Once the project is completed, which is very expensive, I would like to know how these bridges will be maintained in the future, is it possible that we will have to pay a toll every time we go to Vancouver or Portland?

IBR Draft SEIS - RECORD #2185 DETAIL

First Name :	Tatiana
Last Name :	Xenelis
Attachments :	DSEIS-2185_Xenelis_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2185 DETAIL

Submission Date :	11/17/2024
First Name :	Tatiana
Last Name :	Xenelis
Business/Organization/Agency :	licensed OR and WA Realtor

Submission Input :

Hello Interstate Bridge Replacement Staff - with limited understanding and knowledge of the project, I would like to see the Light Rail proposed stations on the plan built (Hayden Island, Vancouver Waterfront, and Evergreen). Park and Ride for light rail in a under-utilized downtown Vancouver area would be optimal . I would like to have a multi-use path as well for walking/biking. I would like to see limited to zero destruction of historic downtown Vancouver neighborhoods and buildings for the Ramps and Carparks. Retaining a C Street vehicular exit is also a priority as this is the main artery into the downtown/Waterfront area currently. thank you for your time and your work,

IBR Draft SEIS - RECORD #2186 DETAIL

First Name :	Paul
Last Name :	Hill
Attachments :	DSEIS-2186_Hill_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2186 DETAIL

Submission Date : 11/17/2024

First Name : Paul

Last Name : Hill

Business/Organization/Agency :

Submission Input :

I use the TriMet public transit system as much as I can as it provides a way for me to get where I need to go without the cost of gas, car maintenance and additional traffic. I also go to Vancouver every weekend, and unfortunately have no timely and feasible public transit option to get there. Even biking, which I've done a few times, is extremely difficult due to aging and outdated infrastructure. Adding pedestrian, bike and light rail options to the I5 Bridge would provide me and many others with the option to travel without adding to an already contested traffic area, as well as reduce climate impacts. Adding pedestrian, bike and light rail access is the equitable, safe and clean option.

IBR Draft SEIS - RECORD #2187 DETAIL

First Name :	Jennifer
Last Name :	Baker
Attachments :	DSEIS-2187_Baker_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2187 DETAIL

Submission Date : 11/17/2024
First Name : Jennifer
Last Name : Baker
Business/Organization/Agency :

Submission Input :

For success of light rail, planning should be in the works for a fast track schedule, that will find at least 1 train/hr not making every max stop. (Nonstop Evergreen to Courthouse Square— get creative, it can happen)

Garbage buildup in the vortex of the C Street exit on the Vancouver side could be mitigated with better off-ramp design (think about off the bridge design in the 40' westward domain egress in the direction of the movie theater). Right now, anyone paying attention when exiting in C. Street would think one is heading a to waste management facility versus the Main Street of a vibrant community. COV is doing a great job when the jurisdiction converts, but WSDOT cannot seem to keep up with the massive amounts of big and small garbage that accumulates. Perhaps design can help solve for the garbage dump aesthetic.

Lastly, the unintended consequence of traffic diverting to MLK/HWY 99 to avoid tolling should be mitigated in the tolling strategy.

Thank you for your consideration. :) It is a big project that will be an amazing legacy for our community!

IBR Draft SEIS - RECORD #2188 DETAIL

First Name :	Hassan
Last Name :	Mohammed
Attachments :	DSEIS-2188_Mohammed_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2188 DETAIL

Submission Date :	11/17/2024
First Name :	Hassan
Last Name :	Mohammed
Business/Organization/Agency :	FHWA

Submission Input :

Good luck ,

Support for seismic resilience and reduced congestion benefits.

Concerns about displacement impacts on residents and businesses.

Interest in tolling strategies and their effect on affordability.

Encouragement for transparency and public engagement throughout the project.

IBR Draft SEIS - RECORD #2189 DETAIL

First Name :	Capt Peter
Last Name :	Wilcox
Attachments :	DSEIS-2189_Wilcox_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2189 DETAIL

Submission Date :	11/17/2024
First Name :	Capt Peter
Last Name :	Wilcox
Business/Organization/Agency :	BNA

Submission Input :

There needs to be kayaker access off Bridgeton Road as part of the project!

IBR Draft SEIS - RECORD #2190 DETAIL

First Name :	Jane
Last Name :	Kim
Attachments :	DSEIS-2190_Kim_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2190 DETAIL

Submission Date : 11/17/2024

First Name : Jane

Last Name : Kim

Business/Organization/Agency :

Submission Input :

I live in N Portland and use the IBR to go to Vancouver and Vancouver Waterfront about 5 times a month. I avoid using the bridge after 2pm on weekdays because traffic seems to start then and even getting onto the I-5 from the N Interstate exit takes way too long. Therefore, I'm happy the new construction will help appease the current traffic issue. My concern, however, is the toll that'll be implemented. It's been nice to use the bridge free of charge, but once I'll have to pay a toll, I think I'll feel less inclined to take my family across the state border for dining & recreation and will resort to staying in the Portland area. I'm wondering if Portland/Vancouver residents will be able to enroll in some special program to help cut toll costs. My last concern is about possible worse traffic that can happen during the construction of the new bridge. Since its projected completion date is 2045, I'm wondering when the construction will start and how the traffic is anticipated to look. I say this because I'm imagining some construction work will have to take place during the day causing even slower traffic and that going on until 2045 seems very inconvenient for those using the bridge.

IBR Draft SEIS - RECORD #2191 DETAIL

First Name :	Gary
Last Name :	Bruley
Attachments :	DSEIS-2191_Bruley_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2191 DETAIL

Submission Date :	11/17/2024
First Name :	Gary
Last Name :	Bruley
Business/Organization/Agency :	Jakes ole' Place Farm

Submission Input :

Adding another bridge down river would be as logical and effective as the 205 bridge has proven to be. Let's put our planning to a much wiser cause and leave the structurally sound I-5 landmark alone.

IBR Draft SEIS - RECORD #2192 DETAIL

First Name :	Amanda
Last Name :	Owings
Attachments :	DSEIS-2192_Owings_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2192 DETAIL

Submission Date :	11/17/2024
First Name :	Amanda
Last Name :	Owings
Business/Organization/Agency :	Otak, Inc.

Submission Input :

I fully support the implementation of the Interstate Bridge Replacement Program as shown in the SEIS. This work was performed comprehensively and with copious public engagement. The preferred alternative provides the best option to relieve congestion, encourage active transportation, connect multiple communities, and give our region long-term stability for safe, continuous travel.

IBR Draft SEIS - RECORD #2193 DETAIL

First Name :	Shirley
Last Name :	Hoehne
Attachments :	DSEIS-2193_Hoehne_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2193 DETAIL

Submission Date :	11/17/2024
First Name :	Shirley
Last Name :	Hoehne
Business/Organization/Agency :	

Submission Input :

NO NO NO to bicycle lanes & Trimet coming into Vancouver!!! We need more vehicle lanes as there are so many transport trucks driving over that bridge daily. Clark County has enough crime; we do not want even more of Portland's crime coming in via Trimet. Trimet is a failing entity in Portland with ridership going down. Please don't bring it into Clark County so that we have to pay for Trimet also. Pedestrians and bicycles could have a lane like the I-205 bridge. No to tolls!

IBR Draft SEIS - RECORD #2194 DETAIL

First Name :	Nanis
Last Name :	Gilmore
Attachments :	DSEIS-2194_Gilmore_Original.pdf (2 kb)

IBR Draft SEIS - RECORD #2194 DETAIL

Submission Date :	11/17/2024
First Name :	Nanis
Last Name :	Gilmore
Business/Organization/Agency :	Residential

Submission Input :

Dear IBR program team:

I am a Vancouver community member living in the Hazel Dell neighborhood near Vancouver Lake. I have looked at many of the YouTube videos describing the proposed bridge with additional interchanges and routes for pedestrian and bike traffic onto and off the new bridge. It was not clear what route I would take to get to the Portland airport, traveling south on I-5 and then onto SR 14 traveling east. Currently there is an off ramp that connects to east bound SR 14 that is fairly simple to access. I assume that is being considered in the final plan.

Also, has there been any discussion of designating a truck lane for all of the semi-trucks that transport goods both south and north daily?

I support the addition of light rail extending into Vancouver from Portland but am concerned that a toll will negatively impact individuals and families who cross the bridge daily from Vancouver to work in Portland. I retired in 2020 due to a 1.5 hr drive time to my office in NE Portland (each way). I noted that the vast majority of the license plates going south from Vancouver in the morning were Washington plates and the same coming home in the evening. A tolling system would add a disproportionate cost to those individuals compared to those living in Portland and using the bridge infrequently.

Thank you for your consideration of my comments.

IBR Draft SEIS - RECORD #2195 DETAIL

First Name :	Kirk
Last Name :	VanGelder
Attachments :	DSEIS-2195_VanGelder_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2195 DETAIL

Submission Date :	11/17/2024
First Name :	Kirk
Last Name :	VanGelder
Business/Organization/Agency :	Automotive Training Specialties; LLC

Submission Input :

What has changed in the 10 plus years? First off, autonomous vehicles are now on the cusp of being viable. Due to criminal activity connected to Light rail, and pandemic fears of using mass transit, autonomous vehicles provide a MUCH better alternative at MUCH lower cost! I didn't see anything in the report about that.... BTW, WE THE PEOPLE (you know, the ones who hold veto power over .gov decisions) have SAID NO LIGHT RAIL THREE TIMES! And YET you won't listen! This is the kind of thing that brought on 1776! So STOP WITH LIGHT RAIL! Build a bridge WITHOUT it and WITHOUT TOLLS, and designed for cars, trucks, and busses period! Hang walking and bike lanes between the two spans or below a single span! ALSO, DO NOT ENCUMBER PEARSON AIRPORT, PORTLAND AIRPORT, or Columbia River Traffic!!!! Those are MUCH MORE CRITICAL to maintain as part of the plan than the completely stupid Light Rail portion! I am VERY TIRED of the CITIZENS BEING IGNORED! Full Stop!

IBR Draft SEIS - RECORD #2196 DETAIL

First Name :	Benjamin
Last Name :	Fryback
Attachments :	DSEIS-2196_Fryback_Original.pdf (2 kb)

IBR Draft SEIS - RECORD #2196 DETAIL

Submission Date : 11/17/2024
First Name : Benjamin
Last Name : Fryback
Business/Organization/Agency :

Submission Input :

I am very concerned about the size and scope of the Interstate Bridge replacement project, and how the project does so much more than replace the Interstate Bridge. As it is proposed, the project will widen and reconstruct I-5 and multiple interchanges in downtown Vancouver and North Portland. This to me, is not indicative of a project that has concern for the environment. The billions spent on freeway reconstruction and widening will not have a significant impact on travel times, and the level of service will not improve. This project's EIS relies on a substantial mode shift to make the climate commitments viable, whereas the project plans show this infrastructure to be merely tacked on. As project costs skyrocket, I am concerned about where the money for the redundant interchanges and auxiliary lanes in Washington and Oregon will come from.

Will we cut into ADA Program funding, and disenfranchise people with disabilities that need curb ramps to go about their daily lives? Will we cut into bridge retrofit funding, and jeopardize the connectivity of the rest of the state post-earthquake? Will we cut into the ODOT maintenance fund, and let our existing infrastructure slip further into disrepair? Will we cut back on the existing signal replacement cycle- which is already 100 years? Will we cut into active transportation funds, and cut projects that will add safe bike routes to schools, work, and grocery stores across the state? Will we cut into already hamstrung safety programs, and get a few new already at-capacity interchanges for the cost of the lives of countless people? Will we cut back on funding for public transportation, such as Amtrak Cascades, which is amid a record ridership surge? Will we cut back on programs that lessen the impact of projects like the IBR, to pay for it, and then rely on those now butchered programs to give it a good reputation?

This all seems wrong. As costs and the scope for this project continue to spiral out of control, the program needs to cut out the chaff, which includes additional collector-distributor and auxiliary lanes and interchange rebuilds, and take into account Oregon's legislatively-mandated VMT reduction targets. It's time we consider the needs of Oregonians who will be getting around in 2040, who are predominantly riders of buses, trains, and bicycles.

IBR Draft SEIS - RECORD #2197 DETAIL

First Name :	Don
Last Name :	Schaad
Attachments :	DSEIS-2197_Schaad_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2197 DETAIL

Submission Date :	11/17/2024
First Name :	Don
Last Name :	Schaad
Business/Organization/Agency :	

Submission Input :

Have you considered building a third bridge to allow I-5 traffic to continue their north/south journey separate from the existing I-5 bridge? This would keep truckers and those traveling on through the area from burdening access to our local Portland/Vancouver thoroughfares. Thus, relieving much of the congestion for local travelers.

IBR Draft SEIS - RECORD #2198 DETAIL

First Name :	Kyle
Last Name :	Mangino
Attachments :	DSEIS-2198_Mangino_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2198 DETAIL

Submission Date :	11/17/2024
First Name :	Kyle
Last Name :	Mangino
Business/Organization/Agency :	

Submission Input :

If light rail is to be allowed on the new bridge, it should be privately funded with absolutely no tolls in WA and OR for 8-10 miles on each side of the Interstate Bridge. Oregon can have tolls if they want anywhere else in OR.

IBR Draft SEIS - RECORD #2199 DETAIL

First Name :	Richard
Last Name :	Philbrook
Attachments :	DSEIS-2199_Philbrook_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2199 DETAIL

Submission Date :	11/17/2024
First Name :	Richard
Last Name :	Philbrook
Business/Organization/Agency :	

Submission Input :

Please don't make vehicle traffic any worse than it already is.

IBR Draft SEIS - RECORD #2200 DETAIL

First Name :	Robert
Last Name :	Lascelles
Attachments :	DSEIS-2200_Lascelles_Original.pdf (2 kb)

IBR Draft SEIS - RECORD #2200 DETAIL

Submission Date : 11/17/2024
First Name : Robert
Last Name : Lascelles
Business/Organization/Agency :

Submission Input :

The IBR Program team consists of a great many agencies whose primary interest is to maximize the potential benefits to their fiefdoms, which may not be fiscally prudent nor responsive. An outsized portion of the proposed improvement cost is for construction of less than two miles of light rail, which is the most expensive cost per user to provide the least flexible infrastructure.

Instead of fixed rail, construction of dedicated lanes for buses, ride share vans and the like, where usage can be evaluated and adjusted to include commercial truck toll usage, or HOV lanes if the bus traffic is found to be underperforming. There is no such option with a rail system. Transit ridership is way down, yet the agencies promoting their own agendas demand a hugely expensive extension of the light rail system, where there is no possible alternate use if the presumed ridership does not materialize.

Note also that the rail line will only serve very specific existing rail nodes. Bus routes can be modified at will to provide direct service in response to actual demand. Perhaps non-stop to Hillsboro, or to OHSU, or Gresham. The market will drive the bus routes, or the lack of bus routes, rather than forcing everyone to downtown Portland, whether or not that is their destination.

The IBR Team leadership needs to evaluate the most cost-effective means of getting the bridge replaced, which might mitigate the need for tolling that the public does not support, especially given the report that a majority of the tolling cost is for collection of the tolls!

IBR Draft SEIS - RECORD #2201 DETAIL

First Name :	Robert
Last Name :	Wallis
Attachments :	DSEIS-2201_Wallis_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2201 DETAIL

Submission Date : 11/17/2024
First Name : Robert
Last Name : Wallis
Business/Organization/Agency :

Submission Input :

Over the past week, a growing number of people have become aware of the “frontage road” claim that was the focal point of the IBR team’s efforts to convince the public and their elected officials that the immersed tube tunnel option was not feasible. I only recently became aware that this claim was refuted by the IBR team’s own engineering staff. I commented on this previously and included an engineering report that I prepared to illuminate that deceit and the implications.

There has been insufficient time for the public to absorb the shocking truth articulated in that report. Please extend the comment period to allow the public to comment on this very critical issue.

It is most unfortunate that the IBR team attempted to deceive the public on a critical item of information. It would be make matters worse if you fail to extend the comment period.

IBR Draft SEIS - RECORD #2202 DETAIL

First Name :	Alyssa
Last Name :	Hursh
Attachments :	DSEIS-2202_Hursh_Original.pdf (2 kb)

IBR Draft SEIS - RECORD #2202 DETAIL

Submission Date :	11/17/2024
First Name :	Alyssa
Last Name :	Hursh
Business/Organization/Agency :	

Submission Input :

There's no livable future that doesn't involve public and active transportation, so it's critical that this new bridge gets these two things right. Today, biking across the existing bridge is a harrowing experience. If you put the pedestrian, bike, and transit infrastructure on the lower level, they will always feel "less than." But pedestrians, cyclists, and transit takers are not "less than" vehicle drivers. We're just as important as car drivers, and we deserve a safe and pleasant Columbia crossing. After all, it's our tax dollars at work, too.

That lower level is going be so cold and so noisy. Go stand on the lower deck of the Fremont or Marquam bridges for a few minutes. It does not feel safe or welcoming. You won't want to be there. If you build a double-decker bridge, relegate the cars to the lower deck and put public and active transit on top with the views and the sunshine. Better yet, build a car-only bridge and a public and active transit bridge. All of the proposals already involve two bridges anyway!

By adding lanes to the new crossing, you're making it clear that you're willing to induce new car demand. We've tried solving stop-and-go traffic by adding new lanes for decades. We already have all the data we need to prove how this approach turns out. Design to induce public and active transportation demand instead! Imagine a future where you yourself want to walk across this bridge! You can do it! A different future is possible, we just have to make it so.

IBR Draft SEIS - RECORD #2203 DETAIL

First Name :	Rob
Last Name :	Vaughn
Attachments :	DSEIS-2203_Vaughn_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2203 DETAIL

Submission Date :	11/17/2024
First Name :	Rob
Last Name :	Vaughn
Business/Organization/Agency :	

Submission Input :

I support the build, specifically the 2 auxiliary lanes option, to reduce congestion and travel time.

IBR Draft SEIS - RECORD #2204 DETAIL

First Name :	Person
Last Name :	Person
Attachments :	DSEIS-2204_Person_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2204 DETAIL

Submission Date :	11/17/2024
First Name :	Person
Last Name :	Person
Business/Organization/Agency :	

Submission Input :

I would like to know how 2045 transit ridership and vehicle travel times would change if light rail transit was extended to Clark College and/or SR 500.

IBR Draft SEIS - RECORD #2205 DETAIL

First Name :	Cindy
Last Name :	Taylor
Attachments :	DSEIS-2205_Taylor_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2205 DETAIL

Submission Date :	11/17/2024
First Name :	Cindy
Last Name :	Taylor
Business/Organization/Agency :	

Submission Input :

Don’t do it!

IBR Draft SEIS - RECORD #2206 DETAIL

First Name :	Clay
Last Name :	Funkhouser
Attachments :	DSEIS-2206_Funkhouser_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2206 DETAIL

Submission Date :	11/17/2024
First Name :	Clay
Last Name :	Funkhouser
Business/Organization/Agency :	

Submission Input :

The case for the Columbia Crossing project was that there was a one out of 3 chance of the area experiencing an 8 magnitude earthquake in the next 50 years. The current bridge would be destroyed. Yet I'm not seeing anything about the planned robustness of the new bridge. Will it be designed to survive an 8 magnitude earthquake?

The IBR statement doesn't sound very strong: "Design structures to comply with federal, state, and city building seismic codes and standards and apply advancements in earthquake science and construction materials and updates in the conceptual model." Is the IBR team targeting the 8 magnitude earthquake a lesser standard?

IBR Draft SEIS - RECORD #2207 DETAIL

First Name :	Vicki
Last Name :	Nakashima
Attachments :	DSEIS-2207_Nakashima_Original.pdf (2 kb)

IBR Draft SEIS - RECORD #2207 DETAIL

Submission Date :	11/17/2024
First Name :	Vicki
Last Name :	Nakashima
Business/Organization/Agency :	SW WA resident/IBR Equity Advisor/Community Benefits Advisory/Founding Leader of Partners in Diversity serving Oregon & SW WA

Submission Input :

I have served on the IBR Equity Advisory and Community Benefits Groups for over 1.5 years. Also indirectly involved with input on CRC and former ODOT Civil Rights manager. I am committed to helping the IBR team avoid mistakes and enhance opportunities that led to past racist impacts of major infrastructure projects in displacing the communities of color in Oregon and SW WA. A major example was caused by policies that excluded black and other POC from living or owning property in Portland. The Vanport Flood was caused by Portland's racist policies that kept Black, Asian and others from living in north Portland. The practice shaped the ability of minorities to own property and easily get displaced to less desirable locations in the Portland area. We are still trying to rectify this inequity in the future of Portland. The relocation of the poor and more diverse home and business owners continues in Portland to this day with the gentrification of Albina and the inner NE and North Portland residents unable to afford housing in N/NE Portland. We need to be diligent in protecting historically underrepresented residents and owners being targeted for relocation to less desireable neighborhoods. The impact on the minority community will result in racial inequities in environmental policy and practices in the future.

IBR Draft SEIS - RECORD #2208 DETAIL

First Name :	Sophie
Last Name :	Rosenberg
Attachments :	DSEIS-2208_Rosenberg_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2208 DETAIL

Submission Date :	11/17/2024
First Name :	Sophie
Last Name :	Rosenberg
Business/Organization/Agency :	

Submission Input :

It's shocking to learn that the program started 20 years ago and it is still under review and provision! It looks like a very exhaustive study and analysis has been done. I just hope that we wrap up and start the construction sooner. Also, I was wondering if there is any lesson we learnt from this experience that we can apply for future programs of this nature so that they can be done more efficiently and effectively.

IBR Draft SEIS - RECORD #2209 DETAIL

First Name :	Jamela
Last Name :	Oribello
Attachments :	DSEIS-2209_Oribello_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2209 DETAIL

Submission Date :	11/17/2024
First Name :	Jamela
Last Name :	Oribello
Business/Organization/Agency :	N/A

Submission Input :

Regarding the Interstate Bridge, It's great to see how the changes are going to be helpful to the community especially those people like us that are traveling through it to get to Washington for events or business. The addition of the double deck design with the light rails would be the best thing for the bridge, I think its be helpful for people who doesn't drive and take trains to travel. I would also think that its gonna bring more people to travel to washington and use the bridge since it one of the goal is to also build a community.

IBR Draft SEIS - RECORD #2210 DETAIL

First Name :	Mitchell
Last Name :	HuffMenne
Attachments :	DSEIS-2210_HuffMenne_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2210 DETAIL

Submission Date :	11/17/2024
First Name :	Mitchell
Last Name :	HuffMenne
Business/Organization/Agency :	

Submission Input :

Please add lighting throughout the multi-use path, separation from freeway traffic by placing the transit line between the multi-use path and the roadway, and building/planting natural and human-made shade. The multi-use path should be next to the MAX line, not on opposite sides of the bridge as it is currently designed. This will make it easier to switch between transit, bicycling, and pedestrian modes, and improve comfort for users of active transportation.

IBR Draft SEIS - RECORD #2211 DETAIL

First Name :	ALBERT
Last Name :	LEPAGE
Attachments :	DSEIS-2211_Lepage_Original.pdf (3 kb)

IBR Draft SEIS - RECORD #2211 DETAIL

Submission Date : 11/17/2024
First Name : ALBERT
Last Name : LEPAGE
Business/Organization/Agency :

Submission Input :

I am writing to provide input regarding the Interstate Bridge Replacement project and to advocate for strong measures to protect, preserve, and restore biodiversity in the affected ecosystems. The Interstate Bridge Ecosystems Technical Report outlines critical habitats and species that could be adversely impacted by this project. It is essential that we take proactive steps to ensure the health of our local ecosystems throughout all phases of construction.

Recommendations for Biodiversity Protection

Before Construction:

1. Comprehensive Environmental Assessments: Conduct thorough assessments to identify all sensitive habitats and species in the project area. This should include both aquatic and terrestrial ecosystems.

2. Native Landscaping Plans: Replace traditional green grass lawns with native plant landscaping around the bridge. This will enhance biodiversity by providing habitat for local wildlife and reducing maintenance needs.

3. Stakeholder Engagement: Involve local communities and stakeholders in planning discussions to incorporate their knowledge and values regarding local biodiversity.

During Construction:

1. Erosion Control Measures: Implement effective erosion and sediment control practices to prevent runoff into aquatic habitats. This includes silt fences, sediment basins, and regular monitoring of water quality.

2. Timing Restrictions: Schedule construction activities to avoid critical periods for wildlife, particularly during fish spawning seasons or migratory periods for birds.

3. Wildlife Monitoring Programs: Establish monitoring programs to track wildlife activity in the area during construction. This will help identify any disturbances or negative impacts early on.

After Construction:

1. Habitat Restoration Initiatives: Commit to restoring any disturbed habitats post-construction using native species that support local wildlife populations.

2. Implement Native Landscaping: Utilize native plant species that are well-adapted to the local environment, which will thrive with less maintenance and water input compared to non-native grass.

3. Long-term Ecological Monitoring: Implement long-term monitoring programs to assess the health of ecosystems affected by the project. Adaptive management strategies should be employed to address any emerging issues.

4. Community Education Programs: Develop educational initiatives that inform the public about local ecosystems and promote stewardship of these natural resources.

The Interstate Bridge Replacement project presents an opportunity not only for infrastructure improvement but also for enhancing our commitment to environmental stewardship. By prioritizing biodiversity protection through these recommendations, we can ensure that our natural heritage is preserved for future generations while meeting transportation needs.

Thank you for considering these recommendations as part of the planning process for the Interstate Bridge Replacement project.

Respectfully,

Albert J. LePage, M.Ed. Science, B.S. Biology
Member, Society for Conservation Biology

IBR Draft SEIS - RECORD #2212 DETAIL

First Name :	Sean
Last Name :	Emery
Attachments :	DSEIS-2212_Emery_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2212 DETAIL

Submission Date :	11/17/2024
First Name :	Sean
Last Name :	Emery
Business/Organization/Agency :	

Submission Input :

No light rail. Downtown Vancouver has been doing great right now, and the last thing the city needs is a light rail station to funnel in all of Portland's homeless. There's been sexual assaults, racial harassment, drug trafficking, gang activity, and multiple shooting at Max line stations throughout the years. Why on earth would we ever allow a blight like that in Vancouver?

This is a deal-breaker for me. Take light rail out of the new bridge.

IBR Draft SEIS - RECORD #2213 DETAIL

First Name :	Noah
Last Name :	Lynch
Attachments :	DSEIS-2213_Lynch_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2213 DETAIL

Submission Date : 11/17/2024
First Name : Noah
Last Name : Lynch
Business/Organization/Agency :

Submission Input :

Please listen to the Just Crossing Alliance and right-size this project. This should not be about freeway expansion as study after study has proven induced demand to be real and expanding freeway capacity does not improve travel times and definitely does not improve our ever-worsening climate. Please also listen to them and make the transit and active transportation elements as attractive as possible, this means keeping them on the same side of the bridge and closer to the ground in order to make connections as easy as can be. Our region deserves the absolute best out of this once-in-a-generation multi-billion dollar project. Please do the right thing and listen to the vast number citizens who are asking for a bridge that works best for EVERYONE. Once again, this is supposed to be a bridge project, not a bloated freeway expansion project. Please take us to a greener future instead of dragging us back into a car-dependent, exhaust-choked past.

IBR Draft SEIS - RECORD #2214 DETAIL

First Name :	Alaina
Last Name :	Tran
Attachments :	DSEIS-2214_Tran_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2214 DETAIL

Submission Date :	11/17/2024
First Name :	Alaina
Last Name :	Tran
Business/Organization/Agency :	

Submission Input :

I think we should ensure safety on the bridge and I-5 because many bridges become unstable after a while so there should be extra support so it doesn’t collapse.

IBR Draft SEIS - RECORD #2215 DETAIL

First Name :	Ryan
Last Name :	Petrea
Attachments :	DSEIS-2215_Petrea_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2215 DETAIL

Submission Date :	11/17/2024
First Name :	Ryan
Last Name :	Petrea
Business/Organization/Agency :	

Submission Input :

I think this is a total waste of taxpayers dollars! This money needs to go to making more bridges to alleviate traffic. Nobody wants to wait in traffic for HOURS to and from Portland /Vancouver. Alleviating congestion should be priority number 1 since both Vancouver and Portland businesses would greatly benefit when people can easily commute and shop! I know as a consumer over 50% of the time I stay home due to traffic congestion.

IBR Draft SEIS - RECORD #2216 DETAIL

First Name :	Jan
Last Name :	Campbell
Attachments :	DSEIS-2216_Campbell_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2216 DETAIL

Submission Date :	11/17/2024
First Name :	Jan
Last Name :	Campbell
Business/Organization/Agency :	

Submission Input :

I Would like to know the process for the selection of the final design.
I'm concerned about the width of the pedestrian walkway across the bridges
How does one get more involved in the design, and are people with disabilities represented on the on-going committees?

IBR Draft SEIS - RECORD #2217 DETAIL

First Name :	cynthia
Last Name :	hurtado
Attachments :	DSEIS-2217_Hurtado_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2217 DETAIL

Submission Date : 11/17/2024
First Name : cynthia
Last Name : hurtado
Business/Organization/Agency :

Submission Input :

I am not opposed to reasonable tolls with a sunset upon completion of funding. Not permanent tolling. A focus on pedestrian, bicycle and light rail is an expensive folly that should be minimized. As a frequent traveler across the i-5 bridge over many years, I have had plenty of opportunities to observe the minimal traffic of pedestrians and bicycles across both the i-5 and Glen Jackson bridge, as well as the light ridership on Met light rail in Portland. Do not saddle taxpayers with high costs that deliver a poor return on investment. Also, please recognize that motor vehicle traffic (both ICE and electric) need significant expansion to prevent this project from being an expensive failure.

Sincerely,

Cyndy Hurtado

IBR Draft SEIS - RECORD #2218 DETAIL

First Name :	R A
Last Name :	Fontes
Attachments :	DSEIS-2218_Fontes_Original.pdf (5 kb)

IBR Draft SEIS - RECORD #2218 DETAIL

Submission Date :	11/17/2024
First Name :	R A
Last Name :	Fontes
Business/Organization/Agency :	N/A

Submission Input :

Please Don't Put Light Rail On The I-5 Replacement Bridge:
TriMet Is In Serious Long-Term Trouble — More Light Rail Will Only Make It Worse

[redacted] [redacted] November 17, 2024

The 2011 EIS is hopelessly out of date regarding public transit.
Transit ridership peaked nationally in 2014, TriMet in 2012, and C-TRAN no later than 1999.
Sources: FTA, National Transit Database (NTD), 2023 National Summaries and Trends, page 105
TriMet, "TriMet Service and Ridership Information" (aka Annual Performance Report, (APR)
C-TRAN, Annual Comprehensive Financial Report, 2023-1999
C-TRAN eliminated or combined several of its interstate routes and now has only three using the I-5 bridge.
Sources: Clark County Today (.com), July 16, 2021, "C-TRAN proposes permanent cuts…"
C-TRAN system map
Portland's CBD, like many others, has seen a huge increase in office vacancies, and the city is taking steps to convert at least some of that space to residential.
Technological change offers more and more alternatives to transit:
Telecommuting is not going away.
Carpooling - now with internet-based matchups available - is outpacing transit.
Source: US Census Bureau, American Community Survey, Table S0801
Autonomous vehicle technology promises to replace transit for many riders while cutting costs proportionately much more for buses than rail services.
C-TRAN's current schedule does not support the EIS conclusions:
Outside of commute hours, C-TRAN's regular 105 bus takes less time between downtown Vancouver and downtown Portland than Max does just between the Expo Center and downtown.
The 105X takes as little as 29 minutes between C-TRAN's 99th Street Transit Center and downtown Portland with no trip scheduled for more than 47 minutes.
There is not enough demand to warrant C-TRAN service into downtown Portland on weekends
TriMet's light rail system has never provided cost effective transportation.

Dividing passenger miles by vehicle revenue miles shown in the APR gives pre-covid MAX loads averaging about 45 passengers in 2019. (less than 27 in FY2024) This number is not significant in itself, but strongly suggests that we'd save scores of millions of dollars annually in operations costs alone if MAX were BRT instead of light rail. TriMet's September 2024 Monthly Performance Report (full edition - available from TriMet), shows light rail trains costing several times as much per hour to run as buses. Our 60' buses have maximum capacities of 80 passengers and should cost very little more to operate than the 40' buses, based on the FX2 Spring 2024 Route Ridership Report. So to be cost effective, MAX needs to average at least three and a half times as many passengers through the various lines' maximum load sections as the district would feel comfortable carrying on those buses. It doesn't and never did.

It's heresy among light rail advocates, but with proper design, BRT offers far better service than MAX. Buses can easily go around problems, offer transfer-free off-guideway service, and higher frequency. With station bypass capability, buses offer faster trips and higher capacity. BRT should be far more resilient in the event of disaster. But the BRT alternatives we've been offered have been so heavily compromised that no one in their right mind would ever choose them.

The net effect is that rail transit in the TriMet district is about denying transportation, not providing it.

Given current developments, the future appears limited for TriMet and bleak for MAX

Covid may be an anomaly but it's also a catalyst and a harbinger. Will telecommuting truly revert to pre-covid levels? How about telemedicine and delivery? The economy is booming: TriMet offers bonuses to new drivers and people worry about inflation. So where are transit riders? What exactly has to happen before ridership gets back up to previous levels?

The world is moving on; developers are not waiting for TriMet. They are offering us more and more alternatives to transit. As mentioned earlier, one to watch is vehicle automation. We can now get rides in Phoenix, San Francisco, and a few other cities in AVs without backup drivers on public roads and in traffic. Since driver costs are a big part of ride hailing services expenses, what will happen with AVs? Bus and light rail car manufacturers are also developing AVs. Since driver expenses are proportionately much higher for buses than MAX, bus AV operating costs should be so low that it will be mathematically impossible for light rail to be cost-effective even if we continue to disregard rail's high capital costs.

If transit is to have an important role in the MSA's future, we need to plan for the 21st century and not the 19th.

IBR Draft SEIS - RECORD #2219 DETAIL

First Name :	allen
Last Name :	hurtado
Attachments :	DSEIS-2219_Hurtado_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2219 DETAIL

Submission Date : 11/17/2024

First Name : allen

Last Name : hurtado

Business/Organization/Agency :

Submission Input :

The emphasis on pedestrian, bicycle and light rail traffic across the the proposed i-5 bridge replacement is a strategy that misses the mark by minimizing the real need for increased vehicle traffic capacity. Tolling should be stipulated to end upon completion of funding. An easily-verifiable study will confirm that the need for light rail, bicycle and foot traffic is a poor investment that will see less use than desired. Please plan for a useful future with increased vehicle traffic capacity. Also please provide for adequate ship traffic clearance without bridge closures.

IBR Draft SEIS - RECORD #2220 DETAIL

First Name :	Scott
Last Name :	Barlow
Attachments :	DSEIS-2220_Barlow_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2220 DETAIL

Submission Date :	11/17/2024
First Name :	Scott
Last Name :	Barlow
Business/Organization/Agency :	

Submission Input :

Adding more lanes increases supply, which increases demand, and then we are back where we started. Look at Huston. Light rail takes cars off the road. If what you want to do is relieve traffic congestion, bring light rail into Vancouver, or as far north as you can get it.

IBR Draft SEIS - RECORD #2221 DETAIL

First Name :	Leon
Last Name :	Laptook
Attachments :	DSEIS-2221_Laptook_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2221 DETAIL

Submission Date :	11/17/2024
First Name :	Leon
Last Name :	Laptook
Business/Organization/Agency :	

Submission Input :

The 100 ft half mile spiral bike/ walk way is nonsensical, impracticable and will create a potentially dangerous environment. Bikes and pedestrians should be able be adjacent to the light rail.

IBR Draft SEIS - RECORD #2222 DETAIL

First Name :	Enrich
Last Name :	Sillem
Attachments :	DSEIS-2222_Sillem_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2222 DETAIL

Submission Date :	11/17/2024
First Name :	Enrich
Last Name :	Sillem
Business/Organization/Agency :	

Submission Input :

As a regular commuter on the Interstate bridge; I find this project very resourceful. In my opinion this project will help reduce the hazzle for daily commuters and anyone traveling/commuting on this bridge from Washington to Oregon and from Oregon to Washington. It'll reduce traffic Jam, Provide more lanes, and more spaces for commuters.

IBR Draft SEIS - RECORD #2223 DETAIL

First Name :	Andrew
Last Name :	Crilley
Attachments :	DSEIS-2223_Crilley_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2223 DETAIL

Submission Date :	11/17/2024
First Name :	Andrew
Last Name :	Crilley
Business/Organization/Agency :	

Submission Input :

I live in the wonderful historic building at 7th and C St, and I am NOT in favor of eliminating the the existing C street ramps, which would leave my fellow tenants and myself without a home that many of us love and some of us could not move from without great disruption to their lives.

IBR Draft SEIS - RECORD #2224 DETAIL

First Name :	THAO
Last Name :	PHAN
Attachments :	DSEIS-2224_Phan_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2224 DETAIL

Submission Date :	11/17/2024
First Name :	THAO
Last Name :	PHAN
Business/Organization/Agency :	

Submission Input :

I am happy to hear about this project. I like the two levels of the bridge which is amazing. I prefer there are a public transit and people can expand community access. That is a good way to save money and save the environment. Additionally, I do not worry about congestion.

I hope people will enjoy to use the public transportation more and more tourists will use it as well. Thank you so much

IBR Draft SEIS - RECORD #2225 DETAIL

First Name :	Nicholas
Last Name :	Ferraro
Attachments :	DSEIS-2225_Ferraro_Original.pdf (3 kb)

IBR Draft SEIS - RECORD #2225 DETAIL

Submission Date : 11/17/2024
First Name : Nicholas
Last Name : Ferraro
Business/Organization/Agency :

Submission Input :

Hello, I live in [redacted] at the Normandy. This apartment has been a huge opportunity for me. I need to be in this neighborhood and I need to be able to afford rent. This apartment is one of the last affordable housing opportunities in this area. If the Normandy is adversely affected by the bridge replacement then I will not have the resources to continue to live in this area. I probably wont be able to afford rent anywhere in the city and I will need to find an alternative to being housed.... This will effect my work as an educator and as a member of this community. I hope that if the Normandy is torn down then there will at least be some program to provide comparable rental units at the same price so that we wont be forced to relocate. Many of the tenants in the Normandy have been here for years and rely on this housing. I understand the need for a new, modern bridge that can withstand the effects of the impending catastrophic earthquake.... But this is a historic property with immense value to the community and it deserves an alternative.

IBR Draft SEIS - RECORD #2226 DETAIL

First Name :	Neva
Last Name :	Halle
Attachments :	DSEIS-2226_Halle_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2226 DETAIL

Submission Date : 11/17/2024
First Name : Neva
Last Name : Halle
Business/Organization/Agency :

Submission Input :

The proposed plan is too expensive and will not provide Vancouver with any measurable results! There will be the same number of lanes which are already too crowded! Plus the addition of light will only compound the amount of crime in Vancouver! This is a lose ~ lose agenda! Gives us a break! No one who lives here in Vancouver or SW Washington has voted for this! I feel that it is being forced up us. If you come up with a legitimate plan, I will back you! However, this is just plain foolishness and a total waste of time and money!
I feel that a third bridge for the interstate trucking business will alleviate the traffic jams with a lot less money.
We don't want to be conjoined with Portland!

IBR Draft SEIS - RECORD #2227 DETAIL

First Name :	W
Last Name :	Jackson
Attachments :	DSEIS-2227_Jackson_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2227 DETAIL

Submission Date : 11/17/2024

First Name : W

Last Name : Jackson

Business/Organization/Agency :

Submission Input :

The IBR Plan seems unrealistic:
It has little public support.
Why does it need to include light rail when citizens in OR and WA have voted down this option because it tends to bring crime to our communities?
The tolling options are too expensive for low-income families and those experiencing physical challenges.
Buses seem to be a better public transportation option because they take riders nearer their final destinations, whereas light rail goes station-to-station.
Our current fiscal situation seems to make this Plan a less practical option.
We trust we will not be stuck with this boondoggle because it's the one the planners want, no matter what taxpayers prefer.
Ridership on public transportation has not increased because of increases in remote work. People are not traveling as much as they did in the past; this plan seems to not have accounted for that shift.
Thank you for accepting public comments. I appreciate the chance to give input.
-

IBR Draft SEIS - RECORD #2228 DETAIL

First Name :	Jane
Last Name :	Kool
Attachments :	DSEIS-2228_Kool_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2228 DETAIL

Submission Date :	11/17/2024
First Name :	Jane
Last Name :	Kool
Business/Organization/Agency :	

Submission Input :

i find this project very meaningful because it’s going to help reduce traffic congestion

IBR Draft SEIS - RECORD #2229 DETAIL

First Name :	Angela
Last Name :	Kelley
Attachments :	DSEIS-2229_Kelley_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2229 DETAIL

Submission Date :	11/17/2024
First Name :	Angela
Last Name :	Kelley
Business/Organization/Agency :	

Submission Input :

I do not support the elimination of the existing C st ramps! This plan would destroy one of the last affordable apartment buildings in Vancouver displacing dozens of people, many who may not be able to afford anything else in the area. There are other options to upgrade the bridge, I beg you to pick another option.

IBR Draft SEIS - RECORD #2230 DETAIL

First Name :	William
Last Name :	Sturman
Attachments :	DSEIS-2230_Sturman_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2230 DETAIL

Submission Date :	11/17/2024
First Name :	William
Last Name :	Sturman
Business/Organization/Agency :	

Submission Input :

I do not support the plan which would eliminate the C Street ramps, as this involves the destruction of the Normandy Apartments. Normandy is a fairly affordable building in an area that desperately needs it, and it is an interesting old building with character, another thing that is in diminishing supply. If this building was demolished, it would be a loss both for the residents who are displaced, and for the community as a whole.

IBR Draft SEIS - RECORD #2231 DETAIL

First Name :	Scott
Last Name :	VanGelder
Attachments :	DSEIS-2231_VanGelder_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2231 DETAIL

Submission Date :	11/17/2024
First Name :	Scott
Last Name :	VanGelder
Business/Organization/Agency :	

Submission Input :

Please don't include lightrail to the new I-5 Bridge. We don't want all of Portlands problems coming to Vancouver. Vancouver residents have voted against lightrail to Portland multiple times. Please honor the wishes of the residents. Also having a replacement bridge that has more than the existing 3 lanes is manditory.

IBR Draft SEIS - RECORD #2232 DETAIL

First Name :	LEN
Last Name :	PHAM
Attachments :	DSEIS-2232_Pham_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2232 DETAIL

Submission Date : 11/17/2024

First Name : LEN

Last Name : PHAM

Business/Organization/Agency :

Submission Input :

I like the single -level movable bridge which will has the clear vision when crossing the bridge and I can see both cities very well. There will be more lanes for bikes and people can walk and more public transportation. We need a security system when people feel safe and comfortable when walking or riding bikes. I hope we will have some tourist boats agencies to grow in the future along with the new bridge. Thank you

IBR Draft SEIS - RECORD #2233 DETAIL

First Name :	Patricia
Last Name :	Hunter
Attachments :	DSEIS-2233_Hunter_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2233 DETAIL

Submission Date : 11/18/2024

First Name : Patricia

Last Name : Hunter

Business/Organization/Agency :

Submission Input :

I ask that you take very seriously public input into this Bridge Project. I STRONGLY request there be NO LIGHT RAIL (LRT). I believe the demand for this is not there (bus transport is still functional) Has there been a cost analysis for this? Mass transit ridership is down, how much is C-Tran given Federal Funds? Ridership in down 50% Why add more debt with a Light Rail that the public is too afraid to take because of the crime on LRT in Portland? Second, The bridge must allow big ships to pass so business upstream can continue and the State does not have to buy them off. This is crazy use of our taxes. Thirdly, NO TOLLS. Manage our taxes better, get accurate and competitive bids and don't allow overrides. Period. Government must be accountable. The Public is smart, Uber and Lyft and Robo Taxies are the future, not Mass Transit.

IBR Draft SEIS - RECORD #2234 DETAIL

First Name :	HUE
Last Name :	DIEP
Attachments :	DSEIS-2234_Diep_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2234 DETAIL

Submission Date : 11/18/2024

First Name : HUE

Last Name : DIEP

Business/Organization/Agency :

Submission Input :

In general, I like this project which can reduce the congestion so far and it will bring the great economy for both states, WA and OR. I am happy that there will be auxiliary lanes which reduce crashes, congestion and improve safety for transportation. We hope this bridge will be well-constructed to deal with the earthquake and will be completed soon. We will have a new vison about I5 bridge and be proud of it when it will be recalled. Thank you.

IBR Draft SEIS - RECORD #2235 DETAIL

First Name :	angad
Last Name :	Singh
Attachments :	DSEIS-2235_Singh_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2235 DETAIL

Submission Date :	11/18/2024
First Name :	angad
Last Name :	Singh
Business/Organization/Agency :	

Submission Input :

The bridge must include rail.

IBR Draft SEIS - RECORD #2236 DETAIL

First Name :	Asha
Last Name :	Hassan
Attachments :	DSEIS-2236_Hassan_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2236 DETAIL

Submission Date :	11/18/2024
First Name :	Asha
Last Name :	Hassan
Business/Organization/Agency :	

Submission Input :

I can’t wait to see the new bridge and enjoy our new city with family friends .

IBR Draft SEIS - RECORD #2237 DETAIL

First Name :	Neyrus
Last Name :	Ali
Attachments :	DSEIS-2237_Ali_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2237 DETAIL

Submission Date :	11/18/2024
First Name :	Neyrus
Last Name :	Ali
Business/Organization/Agency :	

Submission Input :

You guys are doing a wonderful job rebuilding our city

IBR Draft SEIS - RECORD #2238 DETAIL

First Name :	Sharifa
Last Name :	Mohamed
Attachments :	DSEIS-2238_Mohamed_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2238 DETAIL

Submission Date :	11/18/2024
First Name :	Sharifa
Last Name :	Mohamed
Business/Organization/Agency :	

Submission Input :

Good job city of Portland

IBR Draft SEIS - RECORD #2239 DETAIL

First Name :	Khadija
Last Name :	Shareef
Attachments :	DSEIS-2239_Shareef_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2239 DETAIL

Submission Date :	11/18/2024
First Name :	Khadija
Last Name :	Shareef
Business/Organization/Agency :	

Submission Input :

Thank you for making our city a safer one .

IBR Draft SEIS - RECORD #2240 DETAIL

First Name :	Sacdiya
Last Name :	Hassan
Attachments :	DSEIS_2240_Hassan_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2240 DETAIL

Submission Date :	11/18/2024
First Name :	Sacdiya
Last Name :	Hassan
Business/Organization/Agency :	

Submission Input :

Please add a big walkway as well,for runners or people who want to just take a night walk to enjoy the view .

IBR Draft SEIS - RECORD #2241 DETAIL

First Name :	Asha
Last Name :	Hassan
Attachments :	DSEIS_2241_Hassan_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2241 DETAIL

Submission Date :	11/18/2024
First Name :	Asha
Last Name :	Hassan
Business/Organization/Agency :	

Submission Input :

Thank you for rebuilding our city.i hope to see all the bridges rebuilt to withstand major earthquakes.

IBR Draft SEIS - RECORD #2242 DETAIL

First Name :	Henry
Last Name :	Hendrix
Attachments :	DSEIS_2242_Hendrix_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2242 DETAIL

Submission Date : 11/18/2024

First Name : Henry

Last Name : Hendrix

Business/Organization/Agency :

Submission Input :

Respectfully, the IBRP is missing the mark with regard to the needs of the common working people of vancouver and portland. As an every-day bridge user, I see very clearly the need for a replacement. However, the replacement ought to be better than existing. For the common person, this means more emphasis on vehicle traffic and less on other means of transportation. Without the addition of any lanes for commuters, trucks, and errand-runners, I cannot see how the planned replacement bridge serves the needs of the largest user group. Please consider taking a less virtuous approach when assessing how the new bridge will actually be used and design something accordingly. Vehicle tolls will be paying for a large portion of this bridge project and for that reason vehicle use should be the primary focus.

IBR Draft SEIS - RECORD #2243 DETAIL

First Name :	Wendy
Last Name :	Byrne
Attachments :	DSEIS_2243_Byrne_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2243 DETAIL

Submission Date :	11/18/2024
First Name :	Wendy
Last Name :	Byrne
Business/Organization/Agency :	

Submission Input :

Take this opportunity to include safe, connected, useful and inviting lanes for active transportation and walking with this bridge replacement. People on e-bikes and scooters, and on foot, deserve to cross this bridge with dignity and safety. Be mindful of transit connections. Do everything you can to be certain that driving in a car or truck is not the only way to move a person across this bridge safely and efficiently.

IBR Draft SEIS - RECORD #2245 DETAIL

First Name :	Elly
Last Name :	Blue
Attachments :	DSEIS_2245_Blue_Original.pdf (2 kb)

IBR Draft SEIS - RECORD #2245 DETAIL

Submission Date : 11/18/2024
First Name : Elly
Last Name : Blue
Business/Organization/Agency :

Submission Input :

I'm a resident and business owner with a dozen employees in Portland, and have some professional expertise in transportation economics from my time as a transportation reporter and author.

I strongly encourage revisiting traffic count projections for accuracy, based on updated trends. We should be using established, flexible, robust, and equity-informed congestion pricing best practices to manage the demand for driving and parking space on Portland's streets. Increasing capacity without these measures is only going to worsen our traffic crisis on the bridge and off as well as traffic safety in both states, and will cost all involved government entities far more over the long run in internal and external costs. We should reconsider the effect that adding capacity for more cars and more driving trips will have on air and water pollution in communities and waterways surrounding the freeway.

In addition, keeping bike, walking, and transit access separated by the span of the bridge will significantly limit access and the ability to make multi-modal trips over the bridge, as well as disincentivizing non-car trips by increasing the distance that needs to be traveled by bike and on foot. I would like to see further studies that project non-car usage of bridges with the proposed types of facilities. I would like to see the analysis consider the savings to public health (not to mention the infrastructure savings, eg on road wear and parking) of incentivizing non-car trips, and the economic equity and job access impacts of doing so.

IBR Draft SEIS - RECORD #2246 DETAIL

First Name :	Mark
Last Name :	Retzlaff
Attachments :	DSEIS-2246_Retzlaff_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2246 DETAIL

Submission Date : 11/18/2024
First Name : Mark
Last Name : Retzlaff
Business/Organization/Agency :

Submission Input :

I support a replacement, but I believe the additional lanes and ramps are fundamentally unserious response to climate change and transportation equity. We simply cannot expect to reduce congestion and vehicle miles travelled (carbon emissions) by adding lanes. Unless it is expensive in terms of money, time, and convenience to travel across the bridge, people will continue to think nothing of buying houses in Washington and travelling to Oregon.

The only solution to reducing travel in polluting cars (and all of their externalized social costs -- health impacts, traffic deaths, road maintenance) is to make car travel more costly than the alternative. We know that you could reduce congestion by simply tolling cars across the bridge (with higher tolls at peak travel times, and means-tested discounts for low-income folks). With the freeway cleared, buses can travel freely. All of a sudden, there is a viable transit option.

Please rethink this. Make it cheaper, smaller footprint, use tolling to discourage single-occupancy vehicles, and make transit competitive with driving.

IBR Draft SEIS - RECORD #2247 DETAIL

First Name :	John
Last Name :	Lestina
Attachments :	DSEIS_2247_Lestina_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2247 DETAIL

Submission Date : 11/18/2024
First Name : John
Last Name : Lestina
Business/Organization/Agency :

Submission Input :

To reduce future air pollution, it is absolutely necessary that the number of general traffic lanes be reduced, not increased. Any model suggesting otherwise is known to be poor quality, and was selected for its bias.

While I commend the inclusion of Light Rail & Multiuse infrastructure, we need to induce the demand to use that, rather than the car lanes, by reducing the number of general purpose travel lanes.

Suggesting air pollution is reduced by adding more lanes is professional malpractice.

IBR Draft SEIS - RECORD #2248 DETAIL

First Name :	Ken
Last Name :	Smith
Attachments :	DSEIS-2248_Smith_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2248 DETAIL

Submission Date :	11/18/2024
First Name :	Ken
Last Name :	Smith
Business/Organization/Agency :	

Submission Input :

Executive summary, modified LPA - this bridge replacement program is critically needed, not only to replace structurally deficient bridges, but to connect the metro communities with a complete intermodal transportation system. Vehicular, transit and pedestrian rolling. The full build out will alleviate the congestion as the studies have shown. Further, the program will bring much needed opportunities for local worker and businesses to benefit from the work. We are in favor of this program.

IBR Draft SEIS - RECORD #2249 DETAIL

First Name :	Ken
Last Name :	Smith
Attachments :	DSEIS-2249_Smith_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2249 DETAIL

Submission Date :	11/18/2024
First Name :	Ken
Last Name :	Smith
Business/Organization/Agency :	

Submission Input :

Executive summary S-30 Navigation - a lift span should be avoided. Stay on the path of the fixed span.

IBR Draft SEIS - RECORD #2250 DETAIL

First Name :	Ken
Last Name :	Smith
Attachments :	DSEIS-2250_Smith_Original.pdf (3 kb)

IBR Draft SEIS - RECORD #2250 DETAIL

Submission Date : 11/18/2024
First Name : Ken
Last Name : Smith
Business/Organization/Agency :

Submission Input :

Executive summary S-8 community engagement - throughout the public meetings with industry, it has been brought forth the program intends to use Project Labor Agreements (PLA's) with local labor (Unions). Further it appears the Program and the Unions would develop the PLA's without contractor involvement. Please note PLA's not only prevent non-union firm participation, they also impact union firm's as their previously agreed to Master Labor Agreement work rules will potentially change. This is the real impact to the program as this will add cost $ to the program. This is a real impact as noted by CA Gov Gavin Newsome as he vetoed Senate Bill 984. PLAs typically increase project costs by 12% to 20%, sometimes more. In fact, in Los Angeles, a study by the RAND Corporation found that the PLA requirement mandated by the Los Angeles City Council on Proposition HHH, a voter-approved plan to build 10,000 units of affordable housing, increased project costs by 14.5%. We are against their use for this program.

See the article below.

https://www.vtca.org/news/vtca-advocacy-california-governor-vetoes-project-labor-agreements

One of America's most progressive governors agrees: PLA's drive up construction costs, which diverts funding from other priorities.

Advocates for fair and open competition on public construction projects have long argued, with the support of nearly all available academic research, that Project Labor Agreements ("PLAs") increase the cost of public infrastructure.

On September 29, 2024, California Governor Gavin Newsom (D), one of the most progressive Governors in the United States, vetoed Senate Bill 984, which would have mandated between 4-6 total PLAs across two different state agencies. His principal reason for vetoing the legislation was the costs imposed by the PLA mandate.

In his veto letter, Governor Newsom expressed concern that the PLA cost inflation would divert funds away from essential government services. He noted that "the new requirements proposed in this bill could result in additional cost pressures that were not accounted for in this year's budget."

The Governor's concerns about cost increases are well founded. PLAs typically increase project costs by 12% to 20%, sometimes more. In fact, in Los Angeles, a study by the RAND Corporation found that the PLA requirement mandated by the Los Angeles City Council on Proposition HHH, a voter-approved plan to build 10,000 units of affordable housing, increased project costs by 14.5%.

RAND's detailed analysis concluded that the decision to place a PLA on Proposition HHH cost taxpayers an extra $141 million and prevented 800 units of affordable housing from being built.

Think about that. Over 800 families in Los Angeles were denied an affordable housing option because the L.A. City Council caved to politically active construction unions and mandated a PLA on the project.

IBR Draft SEIS - RECORD #2251 DETAIL

First Name :	Roger
Last Name :	Hale
Attachments :	DSEIS_2251_Hale_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2251 DETAIL

Submission Date :	11/18/2024
First Name :	Roger
Last Name :	Hale
Business/Organization/Agency :	

Submission Input :

To say that I am disappointed in the design of this bridge is a major understatement. I spent years crossing this bridge to get to work in Portland and the congestion was horrible. The design presented is going to do almost nothing to improve that. The design needs to be changed to reduce the amount of congestion on the bridge.

IBR Draft SEIS - RECORD #2252 DETAIL

First Name :	Vanessa
Last Name :	White
Attachments :	DSEIS_2252_White_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2252 DETAIL

Submission Date :	11/15/2024
First Name :	Vanessa
Last Name :	White
Business/Organization/Agency :	

Submission Input :

I wonder how shipping cargo will be able to pass through if the bridge is set so low, also does the tide ever rise high enough to present a concern?

IBR Draft SEIS - RECORD #2253 DETAIL

First Name :	Mark
Last Name :	Christopher
Attachments :	DSEIS_2253_Christopher_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2253 DETAIL

Submission Date :	11/18/2024
First Name :	Mark
Last Name :	Christopher
Business/Organization/Agency :	

Submission Input :

I am opposed to bringing light rail to clark county

IBR Draft SEIS - RECORD #2254 DETAIL

First Name :	Barbara
Last Name :	Neidig
Attachments :	DSEIS_2254_Neidig_Original.pdf (2 kb)

IBR Draft SEIS - RECORD #2254 DETAIL

Submission Date : 11/15/2024
First Name : Barbara
Last Name : Neidig
Business/Organization/Agency :

Submission Input :

As a longtime resident, bridge and the years of construction will affect us:
Maximum efficiency of traffic flow at the Marine Drive Interchange is necessary to improve any of the current situation.
Project elements that encourage freight traffic on Marine Drive east of the interchange are damaging to our neighborhood.
Local access between Bridgeton, East Columbia, Kenton and Hayden Island that avoids interacting with I-5 or its feeder routes and maintains access to our two shopping centers is beneficial to all four communities.
Marine Drive between I5 and 33rd Drive is to be considered a residential feeder route. EB freight traffic should be kept entirely on MLK Blvd. and Vancouver Way, diverted to Columbia Blvd and Lombard Street, the preferred freight route. In doing this several projects are possible:
Remove the exit ramp at EB MLK and Union Ct. Access from Marine Drive to Union Court should remain in place.
Add an exit ramp at SB MLK and Walker St. for efficient access to Vancouver Way.
NE 6th Dr. becomes the primary commuter access to the residential parts of East Columbia and Bridgeton.
Upgrade NE 6th Dr. with sidewalks for safety.
The intersection at 6th Dr, Faloma Rd, and Marine Dr. has long been a dangerous one. Implement the existing PBOT plan for a roundabout.
Implement the existing PBOT plan for a T-intersection at Bridgeton Rd. and Marine Drive. Including a flashing crosswalk.
Traffic light is a must at Marine Drive and 33rd Drive.

When will the Coast Guard comment on the height of proposed bridge. Their requirement for commercial and recreational water traffic must be followed.

IBR Draft SEIS - RECORD #2255 DETAIL

First Name :	Rollin
Last Name :	Scoggins
Attachments :	DSEIS_2255_Scoggins_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2255 DETAIL

Submission Date :	11/16/2024
First Name :	Rollin
Last Name :	Scoggins
Business/Organization/Agency :	

Submission Input :

We need to stop the theft

IBR Draft SEIS - RECORD #2256 DETAIL

First Name :	CARL
Last Name :	SINGMASTER
Attachments :	DSEIS_2256_Singmaster_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2256 DETAIL

Submission Date :	11/16/2024
First Name :	CARL
Last Name :	SINGMASTER
Business/Organization/Agency :	

Submission Input :

The inclusion of light rail to the bridge adds excessive cost and height limitations to the bridge. Using the light rail corridor instead for ElectricBus/HOV lanes will further improve vehicle throughput and lower emissions impact. Bus routes have destinations that can be altered to provide the best service as future needs and demand change. Express buses can serve multiple destinations on either side. Furthermore any reliance on tolling is reduced by lowering the bridge cost substantially.

IBR Draft SEIS - RECORD #2257 DETAIL

First Name :	Jay
Last Name :	Mehl
Attachments :	DSEIS_2257_Mehl_Original.pdf (3 kb)

IBR Draft SEIS - RECORD #2257 DETAIL

Submission Date : 11/17/2024
First Name : Jay
Last Name : Mehl
Business/Organization/Agency :

Submission Input :

While the Modified LPA for the Columbia River Crossing (CRC) represents a significant effort to update infrastructure in the region, there are several areas where the proposal raises concerns and warrants reevaluation:

1. **Environmental Impact and Navigation Challenges**
The three proposed bridge configurations, including options for fixed and movable spans, may not adequately address environmental and navigation concerns. The relocation of the primary navigation channel and the proposed vertical clearances, even at 178 feet in the movable-span configuration, may not fully accommodate all river traffic needs. This could have long-term impacts on commercial shipping and local industries that depend on uninterrupted river access. Additionally, the environmental impacts of relocating the navigation channel and removing the existing bridge spans may not be fully understood or mitigated.

2. **Cost and Funding Issues**
The scale of the Modified LPA, including the construction of new bridges, light rail transit (LRT) extensions, and improvements to interchanges and local streets, entails significant financial risk. Variable-rate tolling as a financing tool could disproportionately burden commuters and local businesses, particularly those with no viable alternative to crossing the river. Questions remain about whether the projected revenue from tolling can sustainably cover the costs of construction, maintenance, and unforeseen overruns. I object wholeheartedly to any crossing tolls.

3. **Local Displacement and Community Impact**
The proposal to shift the I-5 mainline westward in downtown Vancouver and reconfigure local streets could result in the displacement of businesses and residents. Eliminating the existing C Street ramps may disrupt traffic patterns and accessibility in downtown Vancouver, impacting local economic activity and community connectivity. The broader implications for affected communities deserve further scrutiny to ensure equitable outcomes.

4. **Transit Efficiency and Accessibility**
Although the inclusion of a light rail extension and improvements for bus transit aim to enhance mobility, questions remain about whether these investments will generate sufficient ridership to justify their cost. Moreover, the proposed park-and-ride facilities may not effectively address first- and last-mile connectivity, potentially limiting the utility of the transit options for many users. Historically, the introduction of light rail systems has often been associated with concerns about increased criminal activity and a decline in property values in nearby neighborhoods. For this reason, I strongly oppose including the construction of light rail as part of the bridge project and expanding it into Vancouver.

5. **Potential Overemphasis on Road Capacity**
While the addition of auxiliary lanes and interchange improvements may inadvertently encourage greater

reliance on car travel rather than promoting a sustainable shift to public transit or active transportation, it is important to recognize the value of these enhancements in accommodating future traffic growth. Expanding lane capacity to GREATER than 3 lanes could help address long-term transportation demands and reduce bottlenecks, balancing immediate needs with broader sustainability goals.

6. **Coordination and Stakeholder Inclusion**
While the Modified LPA claims to have been developed in coordination with federal, tribal, regional, and local partners, concerns persist about the level of meaningful engagement with all stakeholders, including underrepresented communities. It is essential to ensure that the decision-making process reflects a diverse range of perspectives and adequately addresses the concerns of all affected groups.

Thank you for your consideration.

IBR Draft SEIS - RECORD #2258 DETAIL

First Name :	Tobias
Last Name :	Eidem
Attachments :	DSEIS_2258_Eidem_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2258 DETAIL

Submission Date :	11/17/2024
First Name :	Tobias
Last Name :	Eidem
Business/Organization/Agency :	

Submission Input :

I oppose tolls and I oppose light rail.

IBR Draft SEIS - RECORD #2259 DETAIL

First Name :	Tobias
Last Name :	Eidem
Attachments :	DSEIS_2259_Eidem_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2259 DETAIL

Submission Date :	11/17/2024
First Name :	Tobias
Last Name :	Eidem
Business/Organization/Agency :	

Submission Input :

I oppsose tolls, and I oppose light rail.

IBR Draft SEIS - RECORD #2260 DETAIL

First Name :	Greg
Last Name :	Nuber
Attachments :	DSEIS_2260_Nuber_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2260 DETAIL

Submission Date :	11/17/2024
First Name :	Greg
Last Name :	Nuber
Business/Organization/Agency :	

Submission Input :

After all the time n money, how will this with the over crowding of the bridge? Improve traffic in the area?

IBR Draft SEIS - RECORD #2261 DETAIL

First Name :	Shirley
Last Name :	Hoehne
Attachments :	DSEIS_2261_Hoehne_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2261 DETAIL

Submission Date : 11/17/2024

First Name : Shirley

Last Name : Hoehne

Business/Organization/Agency :

Submission Input :

NO NO NO to bicycle lanes & Trimet coming into Vancouver!!! We need more vehicle lanes as there are so many transport trucks driving over that bridge daily. Clark County has enough crime; we do not want even more of Portland's crime coming in via Trimet. Trimet is a failing entity in Portland with ridership going down. Please don't bring it into Clark County so that we have to pay for Trimet also. Pedestrians and bicycles could have a lane like the I-205 bridge. No to tolls!

IBR Draft SEIS - RECORD #2262 DETAIL

First Name :	Sara
Last Name :	Himmelman
Attachments :	DSEIS_2262_Himmelman_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2262 DETAIL

Submission Date :	11/17/2024
First Name :	Sara
Last Name :	Himmelman
Business/Organization/Agency :	

Submission Input :

Build the bridge. Prioritize light rail and bicycle lanes. Minimize environmental impact during construction.

IBR Draft SEIS - RECORD #2263 DETAIL

First Name :	Andrew
Last Name :	Crilley
Attachments :	DSEIS_2263_Crilley_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2263 DETAIL

Submission Date :	11/17/2024
First Name :	Andrew
Last Name :	Crilley
Business/Organization/Agency :	

Submission Input :

I live in the wonderful historic building at 7th and C St, and I am NOT in favor of eliminating the the existing C street ramps, which would leave my fellow tenants and myself without a home that many of us love and some of us could not move from without great disruption to their lives.

IBR Draft SEIS - RECORD #2264 DETAIL

First Name :	Alex
Last Name :	Kosnett
Attachments :	DSEIS_2264_Kosnett_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2264 DETAIL

Submission Date :	11/17/2024
First Name :	Alex
Last Name :	Kosnett
Business/Organization/Agency :	

Submission Input :

I’m concerned that this project is not sufficiently promoting automobile alternatives in its design. More must be done to streamline the user experience of transitioning between transit and active transportation. Prioritize the connection between transit and bike paths; the least this project could do would be to prepare the community for healthier and more accessible mobility. Projects such as the Vancouver Land Bridge show that infrastructure can be healing and effective; please do more to make this structure an asset by considering the ease of use of these connections.

IBR Draft SEIS - RECORD #2265 DETAIL

First Name :	Shirley
Last Name :	Hoehne
Attachments :	DSEIS_2265_Hoehne_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2265 DETAIL

Submission Date :	11/18/2024
First Name :	Shirley
Last Name :	Hoehne
Business/Organization/Agency :	

Submission Input :

We need more lanes for vehicular traffic. There are so many big transport trucks moving over the existing bridge daily. Dump the idea of a bike lane & just put in a pedestrian lane in the center like I-205. NO, NO, NO to transit coming over from d

IBR Draft SEIS - RECORD #2266 DETAIL

First Name :	NA
Last Name :	NA
Attachments :	DSEIS_2266_NA_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2266 DETAIL

Submission Date :	11/15/2024
First Name :	NA
Last Name :	NA
Business/Organization/Agency :	

Submission Input :

NO LIGHT RAIL

IBR Draft SEIS - RECORD #2267 DETAIL

First Name :	NA
Last Name :	NA
Attachments :	DSEIS_2267_NA_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2267 DETAIL

Submission Date : 11/15/2024

First Name : NA

Last Name : NA

Business/Organization/Agency :

Submission Input :

I applaud the fact that we may finally be replacing a 100+ year old bridge; however, I have some concerns. My wife and I are in our late seventies, on limited income. We live in Washougal and have medical issues which frequently require us to see specialists in Portland. Any tolls would be a serious burden on us. I-5 is NATIONAL infrastructure, which supports and is necessary for national as well as international commerce that benefits the entire country. It is particularly onerous to place the burden of financing this national asset on the local population, since the bulk of use benefits the nation at large. Please consider us when assigning tolls.

IBR Draft SEIS - RECORD #2268 DETAIL

First Name :	Phillip
Last Name :	Taggart
Attachments :	DSEIS_2268_Taggart_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2268 DETAIL

Submission Date :	11/15/2024
First Name :	Phillip
Last Name :	Taggart
Business/Organization/Agency :	

Submission Input :

Why does portland oregon continue to add the light rail to the project knowing Vancouver, WA has voted it down numerous time.

IBR Draft SEIS - RECORD #2269 DETAIL

First Name :	Carolyn
Last Name :	Riddle
Attachments :	DSEIS_2269_Riddle_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2269 DETAIL

Submission Date :	11/15/2024
First Name :	Carolyn
Last Name :	Riddle
Business/Organization/Agency :	

Submission Input :

I support this plan whole heartedly. Crossing the I5 bridge on weekdays is both harrowing at times and always exhausting. The old bridge is a wonder of engineering for its time, but it's amazing that it hasn't collapsed by now. How long will it continue to be safe, even without earthquakes? I congratulate Sen. Murray and Rep. Perez on pushing for this transportation improvement. I also support having a bullet train option. It will not only help alleviate traffic, but provide alternative transportation for those who don't drive.

IBR Draft SEIS - RECORD #2270 DETAIL

First Name :	NA
Last Name :	NA
Attachments :	DSEIS_2270_NA_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2270 DETAIL

Submission Date : 11/15/2024

First Name : NA

Last Name : NA

Business/Organization/Agency :

Submission Input :

This will do nothing but move residents out of the state. Tolls, taxes, it's too much. It won't reduce traffic if it's built for bicycles. Traffic will remain the same. Light rail is just another name for the crime train. Have you not learned from the Portland light rail? Count me in as one of the citizens who will move out of state. You do nothing to reduce crime and now this will only add to it.

IBR Draft SEIS - RECORD #2271 DETAIL

First Name :	NA
Last Name :	NA
Attachments :	DSEIS_2271_NA_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2271 DETAIL

Submission Date : 11/16/2024

First Name : NA

Last Name : NA

Business/Organization/Agency :

Submission Input :

We The People are already taxed too much, this is going to put an undue burden on hard working Americans in Washington and Oregon. DO NOT PUT TOLLS IN PLACE!

IBR Draft SEIS - RECORD #2272 DETAIL

First Name :	Nita
Last Name :	Sisco
Attachments :	DSEIS_2272_Sisco_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2272 DETAIL

Submission Date :	11/16/2024
First Name :	Nita
Last Name :	Sisco
Business/Organization/Agency :	

Submission Input :

Absolutely NO tolls for bridges

IBR Draft SEIS - RECORD #2273 DETAIL

First Name :	Laurie
Last Name :	Ewert
Attachments :	DSEIS_2273_Ewert_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2273 DETAIL

Submission Date :	11/16/2024
First Name :	Laurie
Last Name :	Ewert
Business/Organization/Agency :	

Submission Input :

We have lived on Hayden Island for over 30 years. This will have a HUGE impact on our daily lives. We need to have a way on and off the island that is not so impacted by rush hour traffic, but more than that.... a toll would be a major economic burden to our households. Living "on top of" a toll bridge penalizes our daily life activities. Much of what we do, including our church and other family members (children) are on the Vancouver side of the river.

IBR Draft SEIS - RECORD #2274 DETAIL

First Name :	Karen
Last Name :	Wilson
Attachments :	DSEIS_2274_Wilson_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2274 DETAIL

Submission Date :	11/18/2024
First Name :	Karen
Last Name :	Wilson
Business/Organization/Agency :	Vancouver

Submission Input :

This new bridge will last over 100 years, hopefully. It is critical that the design is asthetically pleasing. It would be an error to select the most budget-friendly over a more attractive option. Think to the future.

IBR Draft SEIS - RECORD #2275 DETAIL

First Name :	NA
Last Name :	NA
Attachments :	DSEIS_2275_NA_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2275 DETAIL

Submission Date : 11/16/2024

First Name : NA

Last Name : NA

Business/Organization/Agency :

Submission Input :

No tolls. No light rail. Stop trying to take more of the peoples money. Stop trying to invite more of the portland crime in to Vancouver. You have already shown that all of you waste and misuse tax payer money like crazy. stop the financial bleed you have created.

IBR Draft SEIS - RECORD #2276 DETAIL

First Name :	NA
Last Name :	NA
Attachments :	DSEIS_2276_NA_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2276 DETAIL

Submission Date : 11/16/2024

First Name : NA

Last Name : NA

Business/Organization/Agency :

Submission Input :

Light rail transit (LRT) is superior to the long-term maintenance of roadways and bus rapid transit (BRT), when you factor in the costs of repairing asphalt, replacing tires and batteries on electric busses. Maintainance of track and power lines is far more economical and environmentally-friendly.

Placement of pedestrian and cycling elements in also key, they need to be in close proximity to mixed-use development.

IBR Draft SEIS - RECORD #2277 DETAIL

First Name :	Julie
Last Name :	Kuni
Attachments :	DSEIS_2277_Kuni_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2277 DETAIL

Submission Date : 11/17/2024
First Name : Julie
Last Name : Kuni
Business/Organization/Agency :

Submission Input :

I feel like this is just another boondoggle like the last bridge replacement was. You need to add more lanes, and lots of them! There is just simply too much traffic going north/south on that artery. You all are not looking at this for the future. Double bridge, 6-8 lanes each direction, dedicated carpool lane should be a minimum.
Part two nobody is going to ride your crime rail. It's a trolley to nowhere! Have you tried to get from Vancouver to Intel, to Nike? It will take you three hours and six buses. No sane person is going to do this. The crime rail is not going to get people taking mass transit because it doesn't get you anywhere you need to be in a timely fashion. This is not New York. And because of your demand to have the crime rail, you can't get the bridge high enough to not have bridge lifts. Lifts cause a ton of problems on our freeway. You have not solved any of the problems plaguing this crossing, which is what the bigger problem actually is.

IBR Draft SEIS - RECORD #2278 DETAIL

First Name :	Seth
Last Name :	Holland
Attachments :	DSEIS_2278_Holland_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2278 DETAIL

Submission Date : 11/18/2024

First Name : Seth

Last Name : Holland

Business/Organization/Agency :

Submission Input :

Whatever bridge solution is selected is going to shape the development of the region for the next hundred years at least. Portland and Vancouver commuters are going to be impacted every single day by the decisions we make now. The people who built this bridge as it stands built it with horse buggies in mind. We mustnt fall for the same shortsightedness and build a bridge with tomorrow in mind. It must be multimodal. It must emphasize public transit. It must be built with pedestrian access. This could either be an expensive but ultimately horizontal move or it could vastly improve the quality of life for both cities. It would be a tragedy if squabbles about short term ramifications prevented us from seizing this chance to create something truly transformative that will be felt long after we are gone.

IBR Draft SEIS - RECORD #2279 DETAIL

First Name :	Rob
Last Name :	Neyer
Attachments :	DSEIS_2279_Neyer_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2279 DETAIL

Submission Date :	11/17/2024
First Name :	Rob
Last Name :	Neyer
Business/Organization/Agency :	

Submission Input :

I firmly support a "right-sizing" of the IBR, as the current plan is modeled on demonstrably inaccurate traffic projections. As is, the footprint is too large and does not prioritize biking and mass transit. I will NOT support the IBR until the traffic projections are revised in line with historical numbers and projected trends.

IBR Draft SEIS - RECORD #2280 DETAIL

First Name :	Tom
Last Name :	Reilly
Attachments :	DSEIS_2280_Reilly_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2280 DETAIL

Submission Date :	11/18/2024
First Name :	Tom
Last Name :	Reilly
Business/Organization/Agency :	

Submission Input :

Prefer the single span fixed bridge with added lanes. This bridge needed replacement 40 years ago. Lets get all the bridge we can afford. The added expense and hassle for raising the bridge is costly, ugly, unnecessary. BackoffCoasf Guard,support the fixed bridge. We would love to see this done in our lifetime!

IBR Draft SEIS - RECORD #2281 DETAIL

First Name :	Birgit
Last Name :	Koehler
Attachments :	DSEIS_2281_Koehler_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2281 DETAIL

Submission Date :	11/18/2024
First Name :	Birgit
Last Name :	Koehler
Business/Organization/Agency :	

Submission Input :

I know how difficult it is to balance multiple needs for a major project. I want to advocate for one of the “smaller” needs in scale but not small in importance: bicycle.

I have bike commuted for 40 years, and have biked from Portland to Hayden Island. The bike route across the slough is pretty good, but access to the bridge section through Delta Park is a serious safety concern. Bikes have to share the road with cars and trucks where the road parallels I-5. Also, there are some nicely designed sections of bike trails that are now frequently adjacent to homeless camps creating safety concerns especially for solo bicyclists and female bicyclists.

I look forward to the improved access and safety for active transportation users, and hope that includes the access both north and south of the bridge itself. There is much need for improvement in the current arrangement.

IBR Draft SEIS - RECORD #2282 DETAIL

First Name :	Pam
Last Name :	Vetter
Attachments :	DSEIS_2282_Vetter_Original.pdf (6 kb)

IBR Draft SEIS - RECORD #2282 DETAIL

Submission Date : 11/18/2024

First Name : Pam

Last Name : Vetter

Business/Organization/Agency :

Submission Input :

Hello, My home is in the neiborhood affected by the IBR. My property is listed as TCE. I'm wondering if my house would qualify for section 106? The address is [redacted]. It looks like about 128 sf of my yard will be used. I have a few questions in regards to that. Thanks Pam. V

IBR Draft SEIS - RECORD #2283 DETAIL

First Name :	Lawrence
Last Name :	Cheever
Attachments :	DSEIS-2283_Cheever_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #2283 DETAIL

Submission Date : 11/17/2024
First Name : Lawrence
Last Name : Cheever
Business/Organization/Agency :

Submission Input :

First Name:
Lawrence

Last Name:
Cheever

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Hayden Island Issues

Comment:
The $7-12 billion cost is outrageous, while doing little to solve I-5 traffic congestion at the I-5 bridge. The massive bridge will inevitably experience massive cost overruns, causing a redirection of funding meant for social programs.
Bridge tolls at $3-$15 each way, will impose a heavy and daily financial burden on all adjacent communities.
The 18-lane interchange planned for Hayden Island will create a very wide ugly swath of multiple pavement lanes across prime retail property, and a navigational nightmare for the visiting public and islanders.
The bridge's 15-year construction period will create a huge loss of quality of life, income, & property values for Hayden Island and adjacent communities.
An Independent Engineering Commission should investigate & evaluate the option of more suitable, far less

costly, and considerably more environmentally friendly "Immersed Tunnel"! If it was selected for a similar project in Vancouver BC, then why not here?

JCA comment #: 540

IBR Draft SEIS - RECORD #2285 DETAIL

First Name :	Zach
Last Name :	Lesher
Attachments :	DSEIS-2285_Lesher_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #2285 DETAIL

Submission Date : 11/17/2024
First Name : Zach
Last Name : Lesher
Business/Organization/Agency :

Submission Input :

First Name:
Zach

Last Name:
Lesher

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Ecosystems

Comment:
Increasing throughput for motor vehicles will increase the runoff of tire particulate matter into our rivers, which have been known to cause mass salmon die-offs. We should right-size the bridge to ensure that we aren't worsening this situation.

JCA comment #: 538

IBR Draft SEIS - RECORD #2287 DETAIL

First Name :	Zach
Last Name :	Lesher
Attachments :	DSEIS-2287_Lesher_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #2287 DETAIL

Submission Date : 11/17/2024
First Name : Zach
Last Name : Lesher
Business/Organization/Agency :

Submission Input :

First Name:
Zach

Last Name:
Lesher

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
We should double down on space-efficient transportation modes and phase out space-inefficient systems as much as possible. We should not build auxiliary lanes or new interchanges or ramps for this project, and instead future-proof the light rail by making sure to allow for four-car trains, in line with future plans for the light rail system.

JCA comment #: 536

IBR Draft SEIS - RECORD #2289 DETAIL

First Name :	Zach
Last Name :	Lesher
Attachments :	DSEIS-2289_Lesher_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #2289 DETAIL

Submission Date : 11/17/2024
First Name : Zach
Last Name : Lesher
Business/Organization/Agency :

Submission Input :

First Name:
Zach

Last Name:
Lesher

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Induced Demand

Comment:
The project as currently designed will lower the perceived cost of driving, which will result in higher auto traffic being funneled into the Portland region, at a time when our region is struggling to escape the trap of auto-dependence. We should not build the bridge to accommodate projected future auto traffic, especially when that projection is built on a modeling procedure that has historically inflated the number of vehicles that actually end up driving over the bridge to preposterous levels. Let's build for the world that we know we have to achieve, for

our climate and for the livability of future generations. Right-size this bridge and focus on transit capacity and minimizing impact on the surrounding communities.

JCA comment #: 534

IBR Draft SEIS - RECORD #2290 DETAIL

First Name :	Hannah
Last Name :	Rusnac
Attachments :	DSEIS_2290_Rusnac_Origional.pdf (8 kb)

IBR Draft SEIS - RECORD #2290 DETAIL

Submission Date : 11/17/2024
First Name : Hannah
Last Name : Rusnac
Business/Organization/Agency :

Submission Input :

First Name:
Hannah

Last Name:
Rusnac

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Induced Demand

Comment:
Hi, I'm concerned about the inaccuracy of the traffic studies used as justification for widening the freeway and increasing pollution. We know that increasing lanes does not decrease demand and leads to more pollution, more VMT. Right size the bridge, please. And offer improve alternative transit options.

JCA comment #: 533

IBR Draft SEIS - RECORD #2292 DETAIL

First Name :	Hannah
Last Name :	Rusnac
Attachments :	DSEIS_2292_Rusnac_Origional.pdf (8 kb)

IBR Draft SEIS - RECORD #2292 DETAIL

Submission Date : 11/17/2024
First Name : Hannah
Last Name : Rusnac
Business/Organization/Agency :

Submission Input :

First Name:
Hannah

Last Name:
Rusnac

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
Hi, I'm concerned about the new bridge design not prioritizing alternative transit modes. First, it should offer increased rail capacity, with the capability to have multiple lines. The bridge should be designed with the option to convert a section into high speed rail. We are making such a big investment, and high speed rail is a something we need to bring to Cascadia to meet our climate goals. Additionally, rail should be able to accommodate full passenger trains (even if high speed rail doesn't happen.) Stations should accommodate 4

car light rail trains. In terms of pedestrian/bike, this path should be shaded and adjacent to the train lines, instead of on the other side, to help shield from pollution and provide better connections. At the Vancouver side, bikes shouldn't have to use a 100 ft spiral. Rather, they should be able to continue straight for a connection.

JCA comment #: 532

IBR Draft SEIS - RECORD #2294 DETAIL

First Name :	Curt
Last Name :	Enderle
Attachments :	DSEIS_2294_Enderle_Origional.pdf (8 kb)

IBR Draft SEIS - RECORD #2294 DETAIL

Submission Date : 11/17/2024
First Name : Curt
Last Name : Enderle
Business/Organization/Agency :

Submission Input :

First Name:
Curt

Last Name:
Enderle

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Cumulative Effects

Comment:
It really is hard to know where to begin. Starting with a construction outline of a flawed, failed decades-old project so you didn't have to start over with your environmental review. Or rejecting early tolling as a way to manage demand for our roads. Or designing a Texas style 8/10/12 lane freeway, where surely one (or maybe two!!) extra merging lanes might help the flow. Or indifference to active transportation (walking and biking) by increasing distances and forcing the use of a harrowing 10 story circular ramp to connect to ground level. It's

ALL BAD. You had already made your decision of what you wanted to build and thought 7 miles of freeway expansion could all be bundled into a "seismic resilient bridge" bridge project. Not to mention you haven't figured out the funding for your bloated project. And if it is ever build, because Vancouver will certainly fight and complain and litigate about tolls, it will THEN be a monument to the hubris of late 20th/early 21st century freeway planning. Overdesigned, overbuilt and contributing to increased emissions which will destroy our quality of life. You have a chance to transform the region and look forward. But this project will "transform", with a giant grey hulk looming over the (currently) revitalized Vancouver waterfront and Hayden Island communities to save an average of a few minutes. What a waste of "planning". Please do not move forward with this project in the current form. Focus on solving an earthquake resilient bridge and be open with fresh eyes and a fresh construction boundary to ways to make things better for all users.

JCA comment #: 531

IBR Draft SEIS - RECORD #2296 DETAIL

First Name :	Mark
Last Name :	Linehan
Attachments :	DSEIS_2296_Linehan_Origional.pdf (8 kb)

IBR Draft SEIS - RECORD #2296 DETAIL

Submission Date : 11/17/2024
First Name : Mark
Last Name : Linehan
Business/Organization/Agency :

Submission Input :

First Name:
Mark

Last Name:
Linehan

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
I'm a bicyclist who sometimes rides across the existing I-5 bridge. I am concerned that the new bike and walking path design will be a significant obstacle to "active transportation" across the new bridge because of its height at the Vancouver side. 100 feet is a very large elevation to climb, and the 4.5% grade will be challenging for many walkers and bicyclists. I suggest providing an elevator and extending the path so that it can have a longer/gentler grade.
Placing the path on the western side of the bridge would be ever better. Situated on the outside of the transit tracks, the path could share elevators with the transit system; allow walkers and cyclists to convert to/from transit users; and buffer the path from the highway noise. It could extend along the transit route further into north Vancouver, eliminating the need for the huge spiral path.

JCA comment #: 530

IBR Draft SEIS - RECORD #2298 DETAIL

First Name :	Anna
Last Name :	Sandys
Attachments :	DSEIS_2298_Sandys_Origional.pdf (7 kb)

IBR Draft SEIS - RECORD #2298 DETAIL

Submission Date : 11/17/2024
First Name : Anna
Last Name : Sandys
Business/Organization/Agency :

Submission Input :

First Name:
Anna

Last Name:
Sandys

Business or Organization:
Anna Sandys Violins

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
The active transportation lanes should be on the same side as the train with access to elevators

JCA comment #: 529

IBR Draft SEIS - RECORD #2300 DETAIL

First Name :	Jacob
Last Name :	Rose
Attachments :	DSEIS_2300_Rose_Origional.pdf (8 kb)

IBR Draft SEIS - RECORD #2300 DETAIL

Submission Date : 11/17/2024
First Name : Jacob
Last Name : Rose
Business/Organization/Agency :

Submission Input :

First Name:
Jacob

Last Name:
Rose

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
It is crucial that the team consider connections between the neighborhoods that the bridge access will serve. I don’t know how many unused bike paths/lanes I’ve seen that simply aren’t used because they’re along a busy highway with no local connections. Crossing North Portland can feel like playing Frogger. I think it’s essential to provide common sense bike access between the Williams/Vancouver Ave area, the Kenton/Denver Ave area, and the bridge on-ramp for bike. If you make it easy, bikes will use it. If you don’t, people (including myself) will

point the bridge out to friends visiting Portland as the massive waste of tax dollars that it is. Try reaching the magnum opus of the Tilikum Bridge on your bike from Barbur Blvd, and you'll see what I mean…

JCA comment #: 528

IBR Draft SEIS - RECORD #2302 DETAIL

First Name :	suzanne
Last Name :	steffen
Attachments :	DSEIS_2302_Steffen_Origional.pdf (8 kb)

IBR Draft SEIS - RECORD #2302 DETAIL

Submission Date : 11/17/2024
First Name : suzanne
Last Name : steffen
Business/Organization/Agency :

Submission Input :

First Name:
suzanne

Last Name:
steffen

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
Ease of use for bicycle riders, pedestrians, & public transportation riders should be a top priority.
Public transportation & the multi-use path should be integrated together & next to each other.
Connections should be added to the Vancouver/Williams corridor and to the Kenton/Denver Ave. link.
The path in Vancouver should extend to Evergreen to prevent the need for using a 100-foot high spiral.
We need induced demand for public transportation, walking, & bicycling.

Side-by-side Integration: Transit and the multi-use path should be next to each other, for seamless transfers and ease of use. Path users should have convenient access to transit elevators, especially at elevated stations.
Noise and Safety: Positioning transit lanes as buffers between the multi-use path and vehicle lanes can reduce noise, debris, and enhance user safety.
Better Connections:
Vancouver: The path should extend to Evergreen to prevent the need for using a 100-foot high spiral.
Portland: Add connections to the popular Vancouver/Williams corridor in addition to the planned Kenton/Denver Ave. link.

JCA comment #: 527

IBR Draft SEIS - RECORD #2304 DETAIL

First Name :	Sabolch
Last Name :	Horvat
Attachments :	DSEIS_2304_Horvat_Origional.pdf (8 kb)

IBR Draft SEIS - RECORD #2304 DETAIL

Submission Date : 11/17/2024
First Name : Sabolch
Last Name : Horvat
Business/Organization/Agency :

Submission Input :

First Name:
Sabolch

Last Name:
Horvat

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
I oppose the Interstate Bridge Replacement (IBR) as currently proposed, because the proposed IBR is not the right size. I drive round trip across the Columbia River on the I-5 bridge about 50 times per year. I drive during the daytime on weekdays and weekends but not during peak traffic hours. I have rarely faced any delays.

I have many concerns about the oversized impact of the proposed new I-5 bridge, given that the traffic hour congestion should be relieved by adding dedicated public transportation lanes, lower-stress-and-convenient active transportation means, and other related means. Specifically, there has not been sufficient justification provided for a second auxiliary lane in the proposed IBR by the draft Supplemental Environmental Impact Statement (SEIS).

Furthermore, the assumptions used to suggest an amount of increased vehicle demand are faulty and presumably were made to justify the project rather than to inform the project in an unbiased manner. Specifically, in my professional opinion I disagree with the statement in the SEIS that “Daily traffic demand over the Interstate Bridge is projected to increase by more than 35% during the next 20 years,” due to insufficient evidence to lead to that claim. Additionally, I am offended that such a statement in the “Chapter 1 Purpose and Need” of the SEIS is not accompanied by a citation so that statistical analysis could be validated and so that scenarios utilizing the same data but different assumptions could be easily modeled.

That is to say, I agree with adding dedicated public transportation lanes to the new I-5 bridge design and providing safer and easier active transportation options. Reasonable non-vehicular lane options will reduce the vehicular demand. I strongly disagree about the need to add more vehicle lanes in the proposed design. Discussions around the total project cost, induced demand, climate change, and impact to the expanded area are but a few of many strong reasons to avoid building vehicle capacity that would be too large and not needed. Additionally, in my personal experience, there is no need.

JCA comment #: 526

IBR Draft SEIS - RECORD #2306 DETAIL

First Name :	Dick
Last Name :	Watts
Attachments :	DSEIS_2306_Watts_Origional.pdf (7 kb)

IBR Draft SEIS - RECORD #2306 DETAIL

Submission Date : 11/17/2024
First Name : Dick
Last Name : Watts
Business/Organization/Agency :

Submission Input :

First Name:
Dick

Last Name:
Watts

Business or Organization:
Retired

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Topic Area:
Transportation

Comment:
This proposal is incompatible with our collective aspirations for the kind of place we want to live in. Spending upwards of $7 billion to massively expand the bridge and the highways that feed it in both directions is an approach better suited for 20th century Texas than 21st century Oregon and Washington. The IBR team must go back to the drawing board and generate a design that will (1) sustain essential interstate connectivity in the face of an earthquake, (2) improve active and mass transit links between Portland and Vancouver, and (3) minimize impacts on our homes, communities, and budgets.

JCA comment #: 525

IBR Draft SEIS - RECORD #2308 DETAIL

First Name :	Fischer
Last Name :	Shaffer
Attachments :	DSEIS_2308_Shaffer_Origional.pdf (8 kb)

IBR Draft SEIS - RECORD #2308 DETAIL

Submission Date : 11/17/2024
First Name : Fischer
Last Name : Shaffer
Business/Organization/Agency :

Submission Input :

First Name:
Fischer

Last Name:
Shaffer

Business or Organization:
[redacted]

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Induced Demand

Comment:
Please listen to the science of induced demand. If you choose to ignore that, then think about what this money

could be used for instead, better schools and better public art. More accessible and frequent public transit that reduces then need for more asphalt. How much is the maintenance cost and has that money already been set aside?

JCA comment #: 524

IBR Draft SEIS - RECORD #2310 DETAIL

First Name :	KIMBERLY
Last Name :	WING
Attachments :	DSEIS_2310_Wing_Origional.pdf (8 kb)

IBR Draft SEIS - RECORD #2310 DETAIL

Submission Date : 11/17/2024
First Name : KIMBERLY
Last Name : WING
Business/Organization/Agency :

Submission Input :

First Name:
KIMBERLY

Last Name:
WING

Business or Organization:
Hayden Island Resident

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Hayden Island Issues

Comment:
We do need a new bridge, but it needs to be earthquake proof. Many of the residents that live on West Hayden

Island are low income, and are forced to do their grocery shopping in Vancouver because there isn't a grocery store I re on the island anymore. These residents cannot afford to pay a toll everything they need to buy food. Many of our Island businesses have already closed down as have many of the businesses in Delta Park. I believe this is due to both the homeless crisis and what this bridge is going to do to our neighborhood. We need a better plan.

JCA comment #: 523

IBR Draft SEIS - RECORD #2312 DETAIL

First Name :	Stephen
Last Name :	Docy
Attachments :	DSEIS-2312_Docy_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #2312 DETAIL

Submission Date : 11/17/2024
First Name : Stephen
Last Name : Docy
Business/Organization/Agency :

Submission Input :

First Name:
Stephen

Last Name:
Docy

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Climate Change

Comment:
This project will only lead to furthering the contribution of motor traffic to climate change through the expansion of the highway and the increased road traffic it would induce. While it does try to be more green in it's construction this pales in comparison to the pollution that will be emitted by commuters using this bridge. We should be working towards stronger public transit focuses with projects like this being designed for public transit first, not as a nice to have as long as it doesn't negatively affect motorists. To this end the project should focus

solely on redesigning the bridge, avoiding constructing interchanges or expanding the highway away from the bridge, as well as providing better access to public transit and cyclists, giving them the dedicated infrastructure they need to feel safe using the bridge.

JCA comment #: 522

IBR Draft SEIS - RECORD #2314 DETAIL

First Name :	Stephen
Last Name :	Docy
Attachments :	DSEIS_2314_Docy_Origional.pdf (8 kb)

IBR Draft SEIS - RECORD #2314 DETAIL

Submission Date : 11/17/2024
First Name : Stephen
Last Name : Docy
Business/Organization/Agency :

Submission Input :

First Name:
Stephen

Last Name:
Docy

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Induced Demand

Comment:
The project promises benefits to transportation including reduced congestion and better travel times however this focus is flawed as it does not account for induced demand at all and would not realistically improve congestion. We've seen time and time again that expanding roads won't solve traffic and will just cause an increase in the number of people who will drive, leaving congestion the same as before. The project doesn't acknowledge this correctly as it tries to say that the number of commuters wouldn't go up with expansions

which clearly goes against how induced demand works. Because of this I believe the project must instead be paired down to focus just on improving the bridge and adding public transit to it, and not focused on expanding and improving the highway beyond the bridge.

JCA comment #: 521

IBR Draft SEIS - RECORD #2316 DETAIL

First Name :	MICHAEL
Last Name :	SAPERSTEIN
Attachments :	DSEIS_2316_Saperstein_Origional.pdf (9 kb)

IBR Draft SEIS - RECORD #2316 DETAIL

Submission Date : 11/17/2024
First Name : MICHAEL
Last Name : SAPERSTEIN
Business/Organization/Agency :

Submission Input :

Good afternoon Ladies and Gentlemen,

We have been here before. I have lived in Northeast Portland, Oregon for a half century. I live between I-5 and I-205; closer to I-5. I-205 was a blessing however it did not relieve the traffic on the West side of I-5.

The St Johns Bridge has been reduced to two traffic lanes and two bike lanes and takes the brunt of all the 6 shipping terminal traffic. The bridge sways with just a simple TriMet bus on it. Not to mention all the heavy trucks crossing back and forth just to get to Hwy 30. On the other side of the industrial area there is the heavy traffic from the Marine Drive Industrial District which has thousands of cars trying to merge into I-5 North. The 5 pm rush hour has turned into a 1pm rush hour.

It's been 40 years now that Hayden Island and Jantzen Beach businesses were cut off completely with no more conveniences for Safeway, Target, Stanford's, Cracker Barrel, The Jantzen Beach Bowling Ally, The Jantzen Beach Ice Rink, The Jantzen Beach Mall, and all the other struggling businesses. MOST ARE GONE! Hayden meadows had the same result that ended with business closing, Chinese restaurant, Mexican restaurant, Dicks Sporting Goods, Walmart, and Shari's all closed. And believe me, it was not Covid 19 that did the permanent damage. It is the I-5 Freeway that is the cause for cutting North and Northeast Portland in two.

We must return all these jobs to our community. We must make access to Hayden Island and Hayden Meadows once again fluid. We must save Hayden Island and Hayden Meadows. Perhaps reparation's should be paid to the community through developing better access and advertising with digital billboards for a start.

The solution can not be more clear. A third bridge in a third location. Even spacing would dictate starting a new bridge from Above Kelly Point Park. It would be a triple river bridge. Starting above Kelly Point Park, joining Hwy 30 via crossing Multnomah Channel, Willamette River, above East Sauvie Island, and crossing the Columbia River to connect to I-5 some 8 to 10 miles beyond the wide curve of freeway and the merge from I-205. That is a short cut for 100s of thousands! Connecting Cornelius Pass at Hwy 30 would also be an option resulting in a great increase in traffic fluidity. The result would also mean a shorter distance traveled: Traveling less miles will save gas, energy, road wear, road maintenance, and time for everyone. The North and Northeast Portland Community would once again be opened for business, leisure, and touring. Remember; Who wants to stop for anything when you are stuck in traffic just trying to get home.

Who should have a say? All registered voters in Oregon and Washington. It would also be a courtesy to include all indigenous tribes from each state. This might result in a historical name like "The Bridge Of The Gods". I like it!

It would free up Hayden Island, Hayden Meadows, St. Johns and the St. Johns Bridge, Lombard Street, Columbia Blvd., and Marine Drive. Not to mention saving miles and time and money for everyone. So let's skip

replacing the I-5 Bridge for now or until we have TWO other bridges to pick up the slack on either side.

I would love to read this letter at your next public meeting.
Thank you very much,

Michael Saperstein

[redacted]

IBR Draft SEIS - RECORD #2317 DETAIL

First Name :	Matthew
Last Name :	Tuckerbaum
Attachments :	P_NW-Comment-IBR-Draft-SEIS-.pdf (545 kb)

To: Interstate Bridge Replacement Program
From: Matt Tuckerbaum, Board Member, Portland: Neighbors Welcome
Aaron Brown, Board President, Portland: Neighbors Welcome
Date: 17 November 2024
Re: Comment on Draft Supplemental EIS

Portland: Neighbors Welcome is an all-volunteer pro-housing advocacy group, focused on advancing policies that will let every present and future Portlander find and keep a safe, stable home they can afford. We advocate for land use, abundant housing, and transportation policies that will make Portland a fairer and more sustainable city.

In accordance with this perspective, Portland: Neighbors Welcome is a member of the Just Crossing Alliance and firmly supports the recommendations outlined in their submitted testimony[1]. We strongly urge the Interstate Bridge Project to act on the feedback provided by residents and community organizations to right-size this project and realign the design to connect and improve active and mass transit options.

We agree that this important interstate connection should be seismically resilient, but the project has strayed far beyond that remit to become a five-mile highway widening project that poses enormous risks to the Portland region's urban fabric, finances, environment, and quality of life. Specifically, the project as currently designed will:

- Supercharge auto-intensive development throughout the region
- Undermine progress towards co-locating homes, jobs, and commerce in complete communities
- Destroy existing homes and make others unbearable in the midst of a housing shortage
- Absorb financial, physical, and labor resources that would be better dedicated to new housing and active and mass transit projects
- Saddle the Portland Metro region with expensive long-term infrastructure that pollutes our neighborhoods and undermines our climate goals

This proposal is completely out of step with the way that our region operates, and it is incompatible with our collective aspirations for the kind of place we want to live in. **Spending upwards of $7 billion to massively expand the bridge and the highways that feed it in both directions is an approach better suited for 20th century Texas than 21st century Oregon and Washington.** The IBR team must go back to the drawing board and generate a design that will (1) sustain essential interstate connectivity in the face of an earthquake, (2)

[1]The Just Crossing Alliance testimony is available here:
https://justcrossing.org/wp-content/uploads/2024/11/JCA-Overview-DSEIS-Comment-Letter.pdf

improve active and mass transit links between Portland and Vancouver, and (3) minimize impacts on our homes, communities, and budgets.

If we were to task the IBR team with at least a moment of reflection, we would offer the following thoughts:

- **Recognize that transportation and land use are connected:** It is impossible for a road construction project to solve congestion, so the IBR project should do only what it was tasked with and let state and regional planning and transit authorities find ways to rebalance our development and transportation patterns.
- **Homes, Not Highways:** Understand the most pressing needs of our region and make them better - not worse. There is no issue more relevant than the need for more homes, so it is unacceptable for the IBR to propose destroying homes to make way for a highway expansion. *The Columbian* reported in October that the IBR proposes to bulldoze 43 homes in Vancouver to make way for additional freeway right-of-way[2]. That practice should have been left behind long ago, and should never be entertained again, let alone in our current housing shortage.
- **Steward our scarce public resources effectively.** Right-sizing this project must consider both its physical size and the financial toll - both immediate and ongoing. This project as currently designed is completely disproportionate in scope to the need, and that mismatch is even more glaring when it is examined in relation to the other needs of the area. Pare it back and be celebrated for accomplishing what is needed as efficiently as possible.
- **Discrepancies in the traffic projection data are alarming.** Portland: Neighbors Welcome is disturbed by the findings commissioned by the Just Crossing Alliance and published in *Willamette Week* that indicate that the IBR planning team has manipulated the traffic projections used to justify this entire $7 billion highway project[3]. Any decision on building infrastructure - particularly on this scale - must be based on quantitatively sound and rigorous reasoning. It is deeply concerning that a basic analysis of IBR's traffic projections reveal numerous significant inaccuracies.
- **Think about the experiences of humans who cannot or will not drive.** Placing a transit station eight stories above ground level, without any connection to active modes, with little to no separation from a highway, makes clear that this team lacks the expertise necessary to develop a critical infrastructure project in a region where at least 30% of people do not drive. Additionally, expanding the highway right up to existing buildings that house people and businesses will subject people to incredibly harmful levels of noise and pollution. Recognize the impacts of everything you propose. We support the

[2]"43 residential units, 33 businesses in Washington and Oregon could be hit by I-5 Bridge replacement" *The Columbian.* October 1 2024:
https://www.columbian.com/news/2024/oct/01/43-residential-units-33-businesses-in-washington-and-oregon-could-be-hit-by-i-5-bridge-replacement/
[3]"Expert Says Traffic Modeling for Interstate Bridge Replacement Is Wrong" *Willamette Week*. November 11, 2024
https://www.wweek.com/news/2024/11/11/expert-says-traffic-modeling-for-interstate-bridge-replacement-is-wrong/

policy recommendations put forth by the Just Crossing Alliance to improve the active and public transportation components of the project[4].

The crossing that the IBR Program delivers will shape our region for decades to come. We need a better plan for a right-sized bridge replacement as soon as possible, so that we get the resilient crossing we need, instead of being stuck with an enormous, burdensome bridge that will exacerbate our biggest problems, while robbing Oregon and Washington of the resources we need to invest in solutions to our housing, transportation, and climate crises.

[4] That letter is available here: https://justcrossing.org/wp-content/uploads/2024/11/Just-Crossing-Alliance-Active-Transportation-Vision.pdf

IBR Draft SEIS - RECORD #2319 DETAIL

First Name :	Carver
Last Name :	Oblander
Attachments :	DSEIS_2319_Oblander_Origional.pdf (8 kb)

IBR Draft SEIS - RECORD #2319 DETAIL

Submission Date : 11/17/2024
First Name : Carver
Last Name : Oblander
Business/Organization/Agency :

Submission Input :

First Name:
Carver

Last Name:
Oblander

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
As a regular bike commuter, I am worried about the active transportation considerations in this project as proposed. People utilizing more active modes of transportation is vital to the health and environmental goals of our region. However, attempting to use this bridge for active transportation when climbing up 100 foot spirals, dodging traffic, and trying to ignore the roaring traffic inches away will inherently limit the appeal, not to mention compromise people's safety.

Limiting the need to climb, buffering the multi-use path with transit lanes, and prioritizing the convenience and safety of more vulnerable bridge users will encourage more active uses of the bridge. In turn, this will help achieve the climate goals of the project and our region, whilst also simply making it a bridge that people will be

more happy to use. Please don't let active transportation be an afterthought for this project.

JCA comment #: 519

IBR Draft SEIS - RECORD #2321 DETAIL

First Name :	Aaron
Last Name :	Gable
Attachments :	DSEIS_2321_Gable_Origional.pdf (8 kb)

IBR Draft SEIS - RECORD #2321 DETAIL

Submission Date : 11/17/2024
First Name : Aaron
Last Name : Gable
Business/Organization/Agency :

Submission Input :

First Name:
Aaron

Last Name:
Gable

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
This bridge cannot be a cars-first, all others as an afterthought affair. Our car-centric culture is killing our environment, and we need to build infrastructure that both plans for a less car-centric future, and helps move us in that direction.

Towards that end:
- Fully half the bridge should be dedicated to walking, biking, and public transit, to create a space where people feel comfortable commuting away from the crush of cars.
- All non-car infrastructure should be grouped/clustered together: walking on the outside, then cycling, then transit, then finally cars. This gives people moving the slowest the best views of our beautiful river.

- The bridge should be a destination. People should *enjoy* moving across it, not just tolerate it. That means shade, benches, and viewpoints: places to rest as walkers and bikers make their way across and appreciate the view.
- The bridge should be easy to access. Ease of access for walkers, bikers, and transit riders should be the highest priority; cars can travel further out of their way to ensure that slower-moving modes of transport have the easiest -- least out-of-the-way, shortest detour, most beautiful -- access routes.

JCA comment #: 518

IBR Draft SEIS - RECORD #2323 DETAIL

First Name :	Carver
Last Name :	Oblander
Attachments :	DSEIS_2323_Oblander_Origional.pdf (8 kb)

IBR Draft SEIS - RECORD #2323 DETAIL

Submission Date : 11/17/2024
First Name : Carver
Last Name : Oblander
Business/Organization/Agency :

Submission Input :

First Name:
Carver

Last Name:
Oblander

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Induced Demand

Comment:
I am deeply concerned that this project is becoming an expensive boondoggle. While the need for a bridge replacement is obvious, the project as proposed seems to contain significant expenses that do not appear to have justification. Dramatically expanding this highway with multiple additional lanes makes this a much larger and more expensive project than simply a replacement.

Recent independent analysis has shown flaws in the data currently being used to justify the size of the project. Worst of all, that analysis indicates that this won't even actually reduce congestion due to bottlenecks in other places. This is poor stewardship of limited taxpayer dollars. It would be throwing away good money for a more expensive project, with a larger, more destructive footprint, while bringing zero benefits to the people. Please

right-size this project to a more reasonable and true replacement, not a massive expansion.

JCA comment #: 517

IBR Draft SEIS - RECORD #2325 DETAIL

First Name :	Tom
Last Name :	Howe
Attachments :	DSEIS_2325_Howe_Origional.pdf (6 kb)

IBR Draft SEIS - RECORD #2325 DETAIL

Submission Date : 11/17/2024
First Name : Tom
Last Name : Howe
Business/Organization/Agency :

Submission Input :

First Name:
Tom

Last Name:
Howe

Email:
[redacted]

Topic Area:
Land Use and Economy

Comment:
Adding auxiliary lanes will waste land - build the bridge only.

JCA comment #: 516

IBR Draft SEIS - RECORD #2327 DETAIL

First Name :	Deborah
Last Name :	Scott
Attachments :	DSEIS_2323_Scott_Original.pdf (353 kb)

IBR Draft SEIS - RECORD #2327 DETAIL

Submission Date :	11/17/2024
First Name :	Deborah
Last Name :	Scott
Business/Organization/Agency :	
Attachments :	West Side Mulituse Path.pdf (351 kb)

Submission Input :

IBR Team,

Please see my comments on the Draft SEIS (West Side multiuse path).

Deb Scott

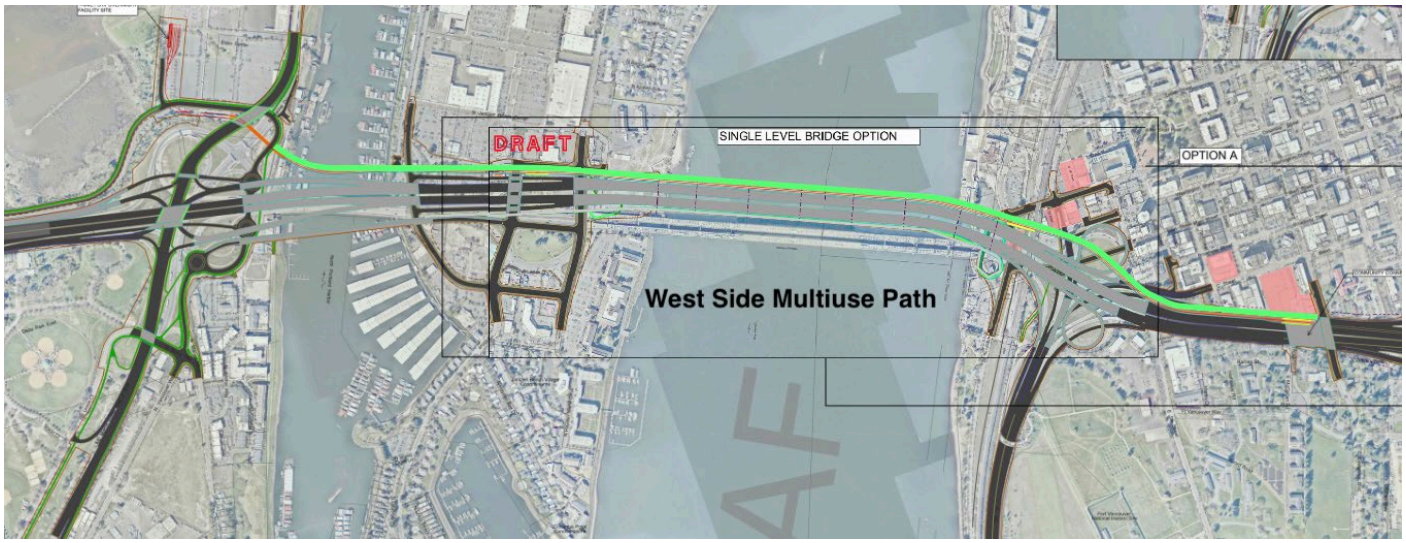
[redacted]

Comments on Studying Building Both the Multiuse Path and the Light Rail Line on the West Side of the South Bound Main Bridge

The IBR proposes building the light rail line on the south bound main bridge and the multiuse path on the north bound main bridge span. The IBR proposal makes each system separate from each other. The IBR proposal makes connections between these two systems difficult and inefficient for transit and active transportation users.

The IBR proposal has stairs and elevators providing connections for transit users, but the stairs and elevators are not usable for users of the multiuse path. The multiuse path has ramp connections for users that are not usable for transit riders. Though these two systems are parallel to each other, but they are entirely separated systems. These systems do not connect easily even though active transportation users want to connect to transit.

I believe additional study is needed to connect these two systems together. People who are not driving to their destination, a goal of the IBR, will often use several modes to reach their destination. Users may ride their bikes to a light rail station, place their bikes on the train in storage specially design for bikes on the light rail train, then ride their bikes for the final leg of their trip. The IBR design of entirely separate light rail and multiuse path makes these blended trips difficult.



One idea that needs to be studied more is to build the multiuse path next to the light rail alignment on the south bound main bridge. Compared to the multiuse path on the east side of the main bridge, the multiuse path on the west side next to the light rail alignment better meets the purpose and needs statement for the IBR to (b) improve connectivity, reliability, travel times, and operations of public transportation modal alternatives in the Program area. The west side alignment provides the following improvements:

- Seamless transition: Users should easily switch between transit and active transportation at any station, with no grade changes or distance barriers.
- Shared elevator access: Allowing active transportation users to share transit station elevators eliminates the need for additional infrastructure, making the design more efficient and accessible.

- Creates redundant ways to connect to both transit and multiuse path: If the elevator is not working, users can use the ramp or stairs. Users not able to negotiate going up the long ramps can use the elevator. Bike users who get a flat tire on the multiuse path can connect to the light rail station and still get to their destination.
- Provides eyes on the path: Transit operators and passengers provide a continuous presence, reducing the isolation felt on a multiuse path and enhancing safety and comfort.
- Better emergency egress: The multiuse path should double as an emergency exit route for the transit way, supporting user safety during unexpected events.
- Inclusive design principles: These principles ensure the accessibility and usability of both transit and active transportation facilities for individuals of all abilities.
- By building the multiuse path on the west side of the light rail trackway provides greater separation from vehicle noise and would offer a more pleasant experience for active transportation users compared to a multiuse path on the east side immediately next to vehicle travel.
- If the multiuse path was built next to the light rail line on the light rail bridge crossing North Portland Harbor, then the multiuse path connection to the 40-Mile Loop would be direct rather than out of direction when the multiuse path is on the local Harbor Bridge.

Regarding Views: There is a good view of Mt Hood if the multiuse path in on the east side of the north bound main bridge, however there is a good view to the west too. Additionally, a quality view of North Portland Harbor and Mt Hood views could be experienced on the local harbor bridge, but the IBR proposes the multiuse path on the west side of that local Harbor Bridge. The IBR also shows a sidewalk on the east side of the local Harbor Bridge. We propose that the side walk on the east side of the Local Harbor Bridge be as wide as possible and include wide spots for stopping on the route to rest and appreciate one of the region's best view of North Portland Harbor.

View East from Local Harbor Bridge

Thank you,
Deborah (Deb) Scott
[redacted]

IBR Draft SEIS - RECORD #2328 DETAIL

First Name :	Deborah
Last Name :	Scott
Attachments :	DSEIS_2328_Scott_Original.pdf (250 kb)

IBR Draft SEIS - RECORD #2328 DETAIL

Submission Date :	11/17/2024
First Name :	Deborah
Last Name :	Scott
Business/Organization/Agency :	
Attachments :	The Vancouver Dip.pdf (247 kb)

Submission Input :

IBR Team,

Please see my comments on the Draft SEIS (the Vancouver Dip).

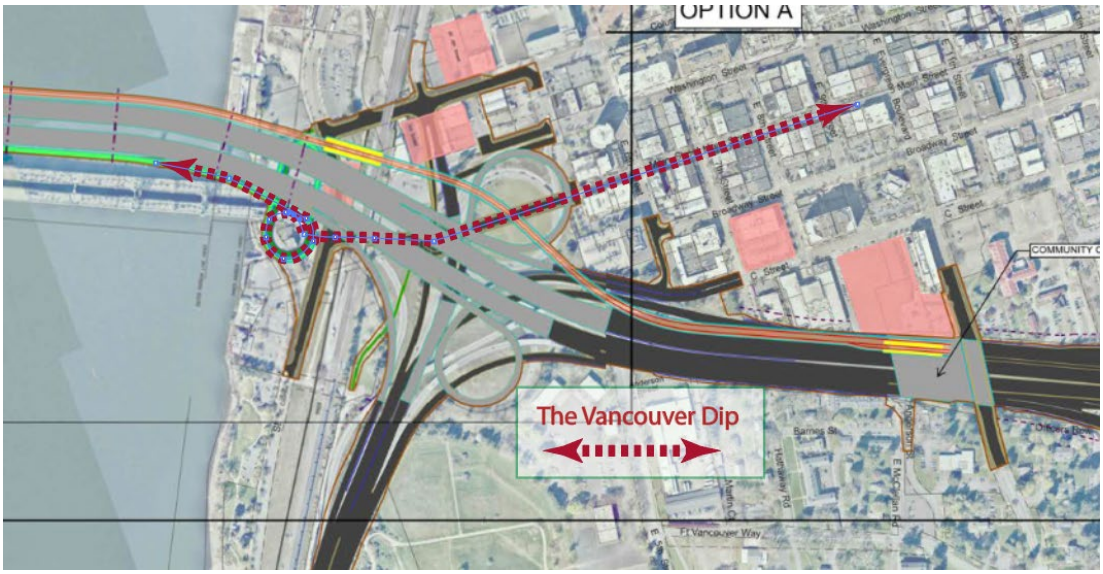
Deb Scott

[redacted]

Comments on the out of direction way active transportation Users Connect to the Multi-Use Path on the Vancouver shoreline: The Vancouver Dip.

If you are traveling by active transportation from central Vancouver, you must first travel down grade to the Vancouver shoreline, then travel up the long spiral ramp to connect to the main bridge multi use path. People who have been studying the IBR ideas often referred to this as the Vancouver Dip.

This is a significant barrier that will discourage use of active transportation due to the extra effort needed to travel down grade from central Vancouver to the shoreline, then up a long ramp to go south on the multiuse path. Northbound travel by active transportation users would experience the same Vancouver Dip in reverse.



The Vancouver Dip does not meet the IBR purpose and need to; (b) improve connectivity, reliability, travel times, and operations of public transportation modal alternatives in the Program area.

To better meet the purpose and need, additional study is needed to see if the multiuse path could be extended to the next light rail station, which is proposed to be a transit hub for Vancouver. This transit hub brings together the new light rail line extension and several BRT lines. Adding a direct connection to the multiuse path at this transit hub would encourage active users and facilitate active transportation users using both transit and biking efficiently for their complete non-auto trip. This would eliminate the Vancouver Dip.

One idea that needs additional study that would alleviate the disconnection between transit and active transportation users is to place the multi-use path and the transit line next to each other on the west side of the southbound main bridge. This idea of the west side multiuse path will be discussed more in a separate comment.

Thank you,

Deborah (Deb) Scott
[redacted]

IBR Draft SEIS - RECORD #2329 DETAIL

First Name :	Deborah
Last Name :	Scott
Attachments :	DSEIS_2329_Scott_Original.pdf (509 kb)

IBR Draft SEIS - RECORD #2329 DETAIL

Submission Date :	11/17/2024
First Name :	Deborah
Last Name :	Scott
Business/Organization/Agency :	
Attachments :	The 40 Mile Loop Connections.pdf (506 kb)

Submission Input :

IBR Team,

Please see my comments on the Draft SEIS (40 Mile Loop connections).

Deb Scott

[redacted]

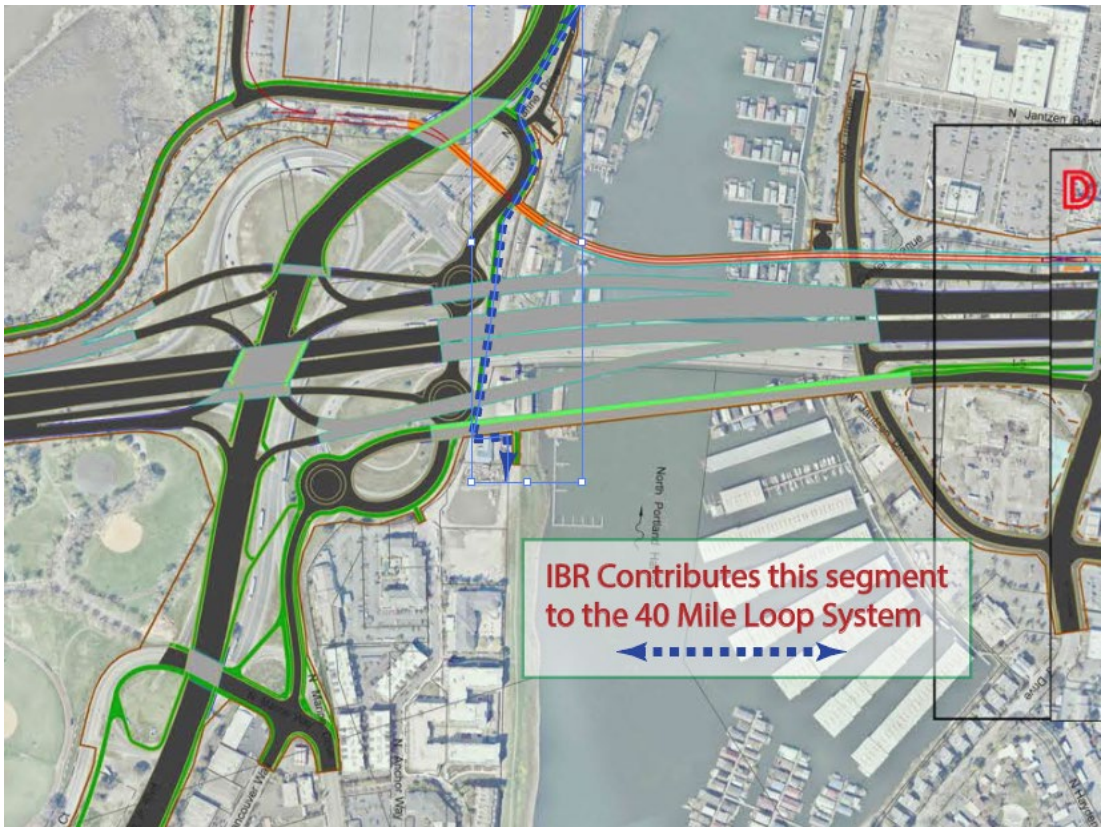
Comments on IBR Multi-Use path Connections to the 40-Mile Loop East/West Corridor

The 40-Mile Loop is a comprehensive regional trail system forming a central hub that connects nearly all other regional trails and parks within Multnomah County. The Loop alignment has been planned and incorporated into regional land use frameworks for over 40 years. While the trail alignment for the 40-Mile Loop has long been established, certain easements remain unacquired, and some portions of the trail are yet to be constructed.

The adopted alignment of the 40-Mile Loop passes through the area impacted by the Interstate Bridge Replacement (IBR) project. While the IBR project provides several benefits to the 40-Mile Loop, I believe additional study is warranted to make the proposed trails safer and more usable.

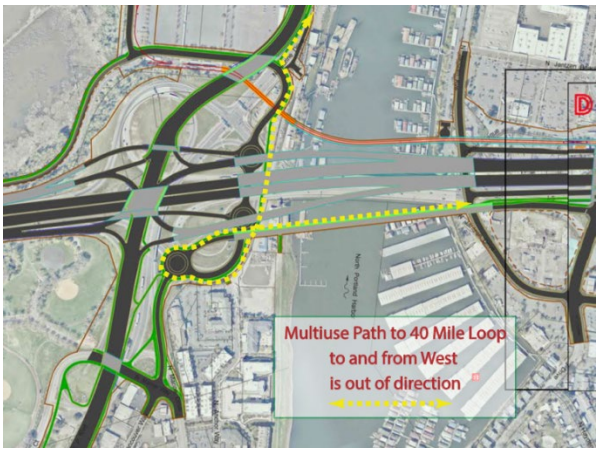
IBR Positive Contributions to the 40-Mile Loop Trail

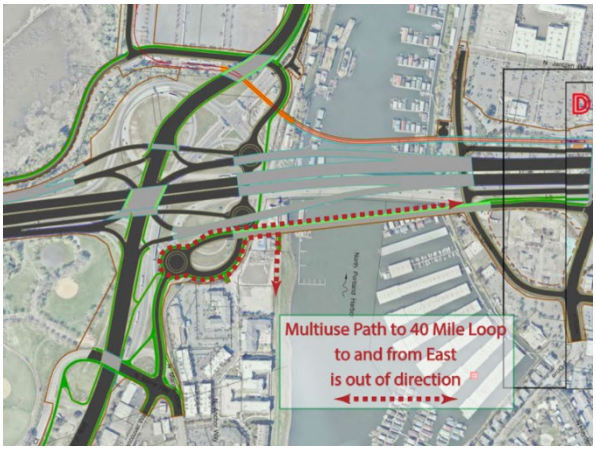
The IBR project will construct the segment of the 40-Mile Loop within the project area. This new trail segment will provide a safe, separated trail connecting the existing 40-Mile Loop trail located west of the proposed bridges through the project area, under the many new IBR bridges emanating from mainland Portland. After crossing under the local Harbor Bridge, the east most bridge proposed, the IBR will stub out the trail to the east for a future connection to the Bridgeton Trails segment of the 40-Mile Loop. This is a good trail addition to the 40-Mile Loop and appreciated by the 40-Mile Loop Land Trust Board.



Concerns with the Proposed Connection of 40-Mile Loop to the multiuse path on the local Harbor Bridge

However, the proposed trail connections from the multiuse path on the local Harbor Bridge to the new 40-Mile Loop segment is not optimal. The proposed design requires users to travel out of their way, navigating a traffic circle and crossing vehicle lanes to reach both the eastbound and the westbound trail connection. This routing is neither convenient nor efficient and could discourage its use.





Request for Further Study of better East and West Connections to the 40-Mile Loop

I strongly recommend that alternative design options be considered to provide a more direct, connection to and from the east and west to the local Harbor Bridge multiuse path.

Possible additional study include:

1) Creating a direct connection from the east stub of the Bridgeton Trail to the sidewalk on the east side of the local Harbor Bridge. This direct connection would make it easier and more appealing for cyclists and pedestrians to cross the Harbor Bridge, while also offering a scenic route with views of North Portland Harbor and Mt Hood.
2) Additionally, I request that the sidewalk on the east side of the local Harbor Bridge be designed to be as wide as possible, with areas to rest and enjoy the views, further enhancing the experience for users.
3) Study more direct trail connections from the local Harbor Bridge multi use path to both the east and the west that do not involve routes around the Marine Drive traffic circles and crossing travel lanes.
4) Study routing the IBR entire multiuse path on the west side of the bridges rather than the east side. If the multiuse path was located on the light rail bridge on the west side, the east and west connection would be straight forward and direct. The west side multiuse path is discussed more in a separate comment.

5) Lastly, I have submitted a separate comment on ways the IBR could facilitate more just a stub for the east side connection to the Bridgeton Trail segment of the 40 Mile Loop.

Thank you,

Deborah (Deb) Scott
Treasurer
40 Mile Loop Land Trust Board
[redacted]

IBR Draft SEIS - RECORD #2330 DETAIL

First Name :	Deborah
Last Name :	Scott
Attachments :	DSEIS_2330_Scott_Original.pdf (198 kb)

IBR Draft SEIS - RECORD #2330 DETAIL

Submission Date :	11/17/2024
First Name :	Deborah
Last Name :	Scott
Business/Organization/Agency :	
Attachments :	Synergies Empowered by the IBR.pdf (260 kb)

Submission Input :

IBR Team,

Please see my comments on the Draft SEIS (synergies).

Deb Scott

[redacted]
[redacted]

Synergies Empowered by the IBR

Coordinate synergies between improvements by the IBR and other large public and private projects being constructed at the same time. This synergy coordinated by the Cities of Portland and Vancouver could create public amenities greater than any of the individual projects could provide on their own.

Example: **Create Bridgeton Trail Segment of the 40-Mile Loop**

1) IBR road system requires acquisition of property to build the new Harbor bridges. That property under the new bridges finally puts into public ownership a key missing trail segment of the 40-Mile Loop.
2) At the same time as the IBR, the Army Corp of Engineers is upgrading the adjacent levee. The improved levee will be higher in elevation and finished with a compacted gravel maintenance road.
3) That key trail segment is also located in an existing Portland urban renewal district. The urban renewal district has already designed the finished trail, amenities and connections to local walkways. The urban renewal district had set aside funds to do the finish work once the trail easements were acquired.
4) By completing this trail segment, hundreds of residential units in Bridgeton (neighborhood) have a direct, protected and safe way to walk and roll to the Expo Light Rail Station. This enhances ridership numbers for the IBR light rail and FTA funding requests.

The City of Portland can coordinate these projects together. Work IBR is already planning to do can create a synergy that builds a key piece of trail infrastructure greater than any one project could do on their own.

This is just one example of possible synergies empowered through the IBR.
There are other synergies for Hayden Island, Vancouver Waterfront, and Historic Reserve.

Thank you,

Deborah (Deb) Scott
[redacted]

IBR Draft SEIS - RECORD #2331 DETAIL

First Name :	Deborah
Last Name :	Scott
Attachments :	DSEIS_2331_Scott_Original.pdf (504 kb)

IBR Draft SEIS - RECORD #2331 DETAIL

Submission Date :	11/17/2024
First Name :	Deborah
Last Name :	Scott
Business/Organization/Agency :	
Attachments :	Separating Freight & Bike Travel.pdf (501 kb)

Submission Input :

IBR Team,

Please see my comments on the Draft SEIS (separate freight and bike travel).

Deb Scott

[redacted]
[redacted]

Separating Freight and Bike Travel on the Marine Drive Interchange and On-Ramps

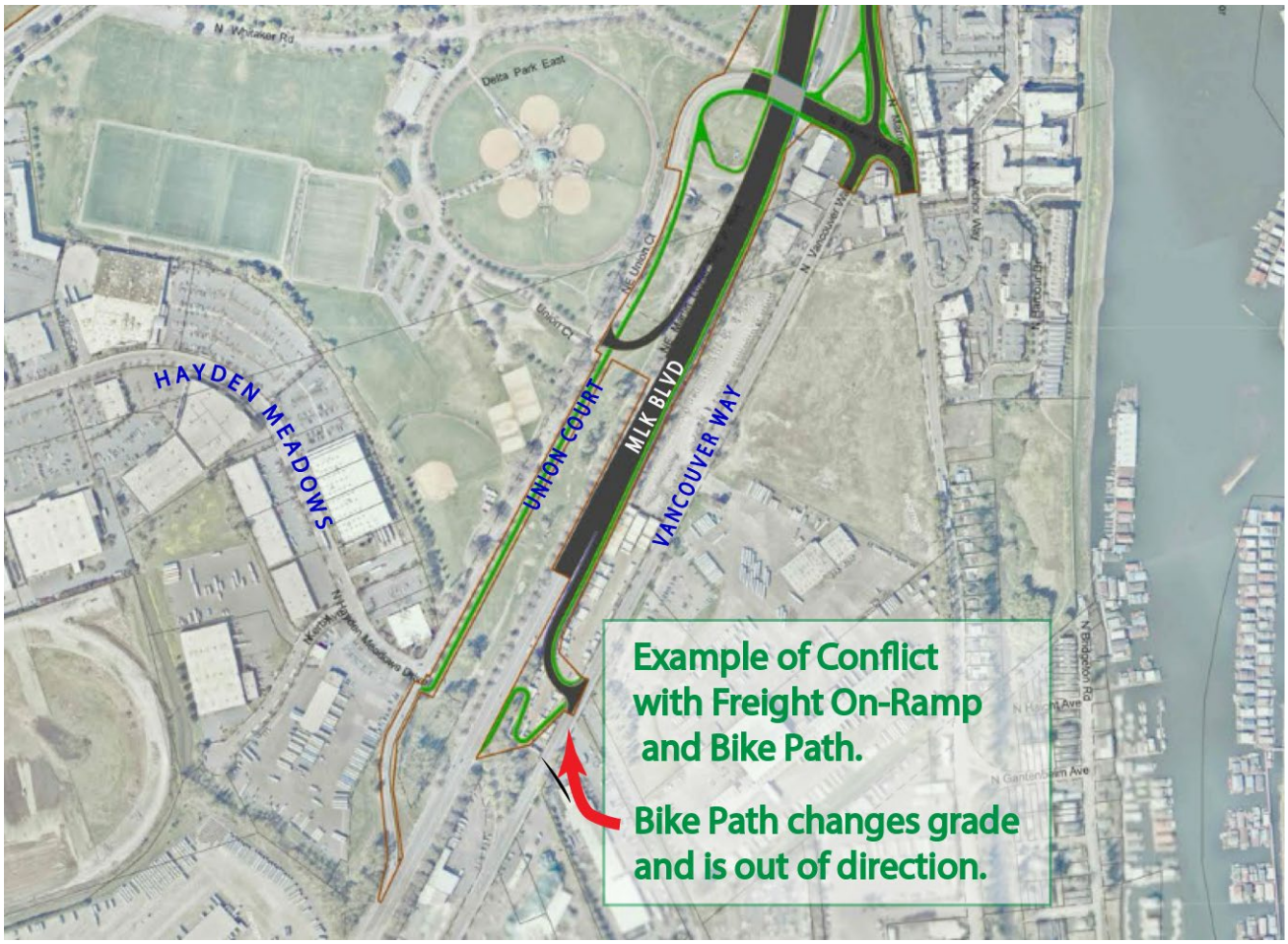
One important purpose and need of the IBR is to (c) improve highway freight mobility and address interstate travel and commerce needs in the Program area.

Another important purpose and need is to (b) improve connectivity, reliability, travel times, and operations of public transportation modal alternatives in the Program area.

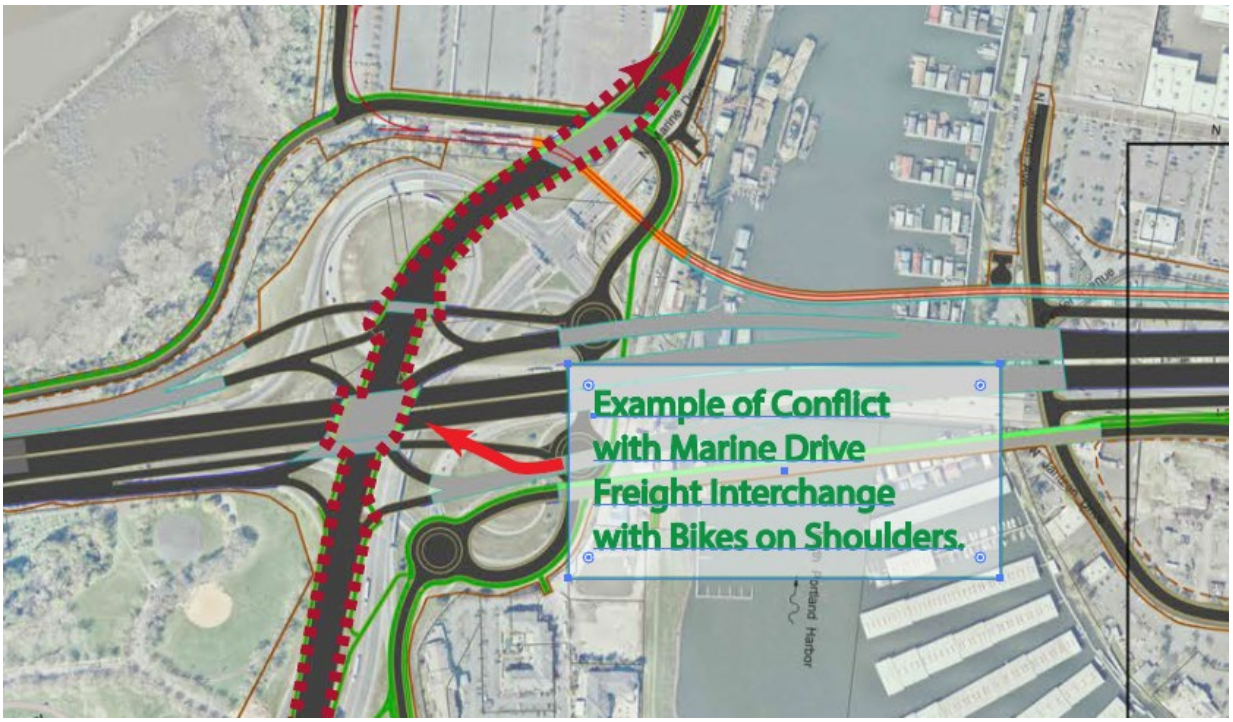
A way to meet the purpose and needs of both freight users and active transportation users is to build active transportation routes physically separated from Freight routes as much as possible. Maximizing this separation is key to creating efficient Freight routes while creating safer, more attractive, and therefore more heavily used walking, rolling, and biking routes.

Examples of Conflicts between Freight and Active Transportation users.

The proposed IBR design for the ramp from Vancouver Way to MLK North poses significant conflict between freight and bikes, as the proposed bike route travels changes grade along a switch back, crosses a major freight intersection and climbs a grade up along a freight-heavy on-ramp.



Another example of possible freight-bike conflict is in the Marine Drive Interchange. Here IBR proposes to build a complete bike lanes and pedestrian sidewalk on both sides of the interchange.



Even if the IBR is required by State law to provide bike and pedestrian facilities on the Marine Drive interchange, we recommend additional study on improving two aspects of these improvements:

1) Any facilities for bike and ped that must be built on Marine Drive needs to be built in a way that separates bike and ped travel from freight as much as possible using techniques such as barriers and raised bike roadways.

2) To discourage any active transportation users from crossing the Marine Drive interchange, also build alternative routes that go around the Marine Drive Interchange rather than through the interchange. This separate bike ped system needs be so well design that it becomes the preferred route. Current IBR design has the MLK active user connection provided partially along MLK shoulders and partially on separated trails. To become the preferred route, an active transportation route that is not reliant of MLK shoulders need to be developed. This separated preferred corridor needs to conveniently link to each of the existing regional bike corridors.

Complete separation creates safety for both the people that are walking, biking and rolling in this area, but also makes it safer and more efficient for freight users who don't have to worry about negotiating on ramps with curves and with grade changes while watching out for bike users traveling the exact same routes.

This separation better meets 3 parts of the purpose and needs statement of the IBR: (a) improve travel safety and traffic operations on the I-5 river crossing and associated interchanges; (b) improve connectivity, reliability, travel times, and operations of public transportation modal alternatives in the Program area; and (c) improve highway freight mobility and address interstate travel and commerce needs in the Program area.

Given the Marine Drive interchange is usually described as the **most heavily used freight corridor in Oregon**, we encourage the IBR to work with the active transportation users in combination with the freight users **together rather than separately** to refine designs that efficiently moves freight users through the Marine Drive interchange and active transportation users around the interchange.

Thank you,

Deborah (Deb) Scott
[redacted]

IBR Draft SEIS - RECORD #2332 DETAIL

First Name :	Deborah
Last Name :	Scott
Attachments :	DSEIS_2332_Scott_Original.pdf (451 kb)

IBR Draft SEIS - RECORD #2332 DETAIL

Submission Date :	11/17/2024
First Name :	Deborah
Last Name :	Scott
Business/Organization/Agency :	
Attachments :	MLK Undercrossing.pdf (450 kb)

Submission Input :

IBR Team,

Please see my comments on the Draft SEIS (MLK undercrossing).

Deb Scott

[redacted]

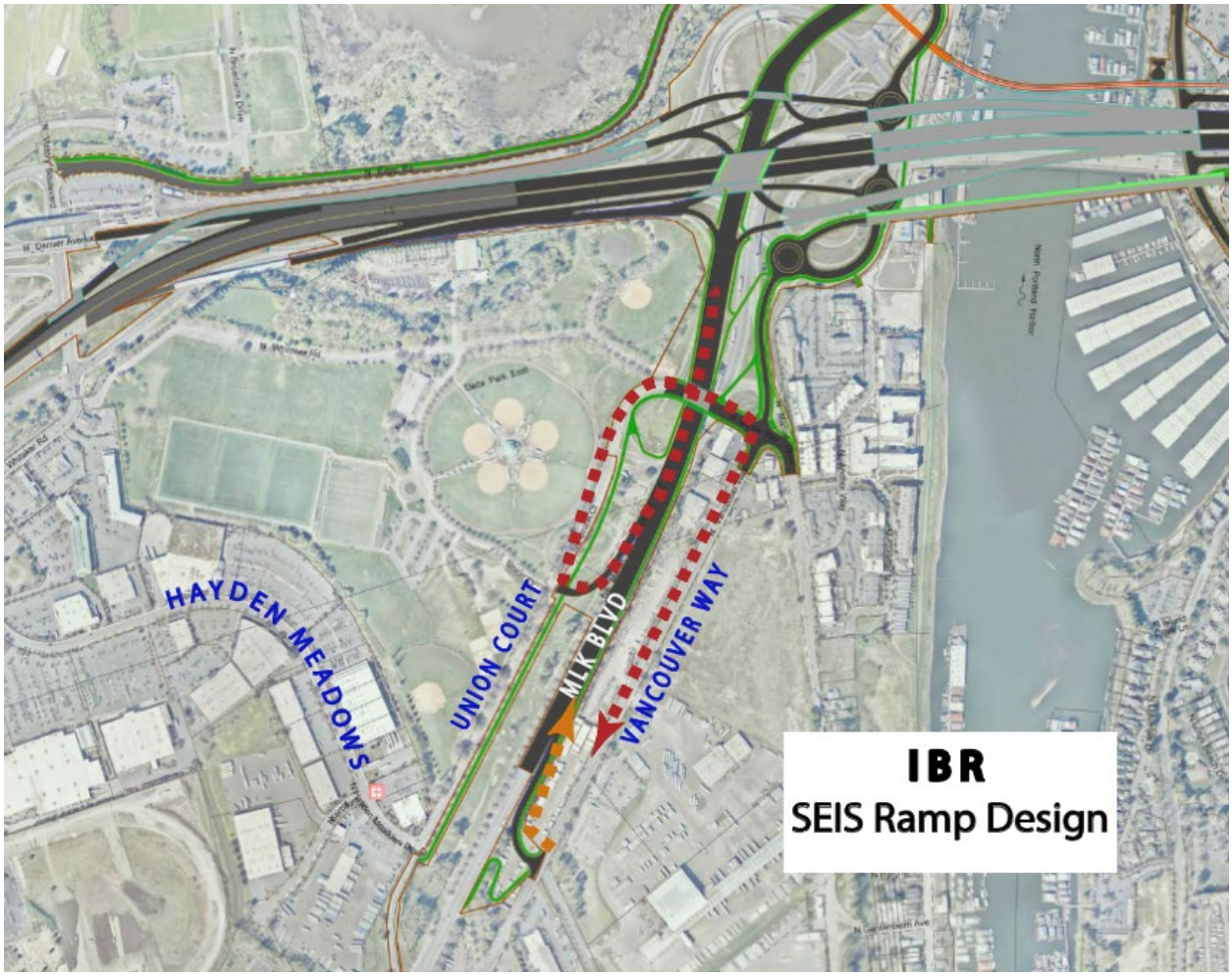
The MLK Undercrossing and Complete Interchange
Better Freight & Neighborhood Access Ramps for the IBR

Initial Proposed Design for MLK Access Ramps

The Interstate Bridge Replacement (IBR) proposes a Martin Luther King (MLK) on-ramp and off-ramp design that meets very minimal requirements:

1) These ramps replace the existing ramp connections.
2) These ramps merge vehicles onto MLK further away from the Marine Drive single point intersection improving the merge/weave problems with the current intersection.

But this minimal ramp design does not align with other important goals for Portland, including efficient regional freight movement, recreational park safety, and understandable way finding.



Problems with the proposed MLK ramp design

1) The proposed ramp design creates out of direction travel.
2) The proposed design is confusing to navigate. A traveler will take the off-ramp to leave the Marine Drive / MLK interchange, but not clearly see how to get back onto the Marine Drive / MLK interchange. There is the same way finding confusion in reverse

3) The proposed MLK off-ramp conflicts with Delta Park's primary recreational entrance. Since this a major Freight travel ramp, this ramp should not conflict with the major access to a major recreational area.
4) The proposed MLK ramp encourages freight movement to use East Marine Drive for access when the Freight Master Plan wants freight travel to use Columbia Blvd to MLK for freight access rather than East Marine Drive, which is a local neighborhood roadway.

Proposal - MLK Undercrossing and Complete Intersection

There is a better design to meet all of IBR requirements while also meeting broader Portland's freight, neighborhood, and parks planning goals.

This new ramp design proposes an undercrossing under MLK connecting Hayden Meadows Drive to Vancouver Way. This new MLK undercrossing combined with slightly relocated MLK on-ramps and off-ramps has the following advantages:

1) The complete MLK Intersection minimizes out of direction travel.
2) The complete MLK intersection removes Freight users from the main Delta Park Entrance.
3) This design would be easier to navigate. It is more understandable for freight and other users just how to get on and off MLK and the access the Marine Drive Interchange.

4) The new undercrossing meets the purpose and need of the IBR: (a) improve travel safety and traffic operations on the I-5 river crossing and associated interchanges; (c) improve highway freight mobility and address interstate travel and commerce needs in the program. The MLK undercrossing designs meets the purpose and needs better than the minimal IBR ramp design.
5) Lastly, the MLK undercrossing provides a new way to access the Hayden Meadows Drive commercial shopping area. This new access could help off-set the removal of the direct access to Hayden Meadows that exist today from the current Marine Drive intersection to I-5 South to Interstate Ave off ramp. This existing off ramp connection from Marine Drive south bound on-ramp to Interstate Ave was removed to provide for the new braided ramp from Marine Drive to I-5. This Interstate Avenue ramp connection from I-5 still exits if someone is on the main line of I-5. However Marine Drive travelers on the local Portland system wanting to access Interstate Ave in the IBR proposed design would have to travel through the three new Marine Drive traffic circles, then to Expo Road then connect to Interstate Avenue. The MLK undercrossing design would create another more direct way to get to Hayden Meadows Drive and Interstate Avenue.

IBR's Response to Building the MLK Undercrossing

Have Portland Fund This – Not the IBR
This undercrossing has been proposed to the IBR early in the design process. IBR has stated that a MLK undercrossing might be nice to have but that the undercrossing should be something that City of Portland funds later.

A complete MLK undercrossing and ramp design is more appropriate to be included in the IBR funding package. This undercrossing improves freight connections for this intersection described as Oregon's most important freight interchange. The MLK undercrossing excels at meeting the IBR purpose and need (c) **improve highway freight mobility**.

IBR building a minimally acceptable ramp design and suggest the local city come back later and rebuild the preferred connection is not good public policy. The cost of the undercrossing would be an exceptionally large funding request for Portland. The undercrossing is more appropriate to be funded in the budget for a project that describes itself as building a bridge to meet the needs for the next 100 years.

Please study the MLK undercrossing and full interchange design.
Involve the freight community, residents, PBOT, and PP&R. Let's work together to refine a ramp and undercrossing design that excels at meeting Section C of the Purpose and Need of the IBR to improve freight mobility.

Thank you,

Deborah (Deb) Scott
[redacted]

IBR Draft SEIS - RECORD #2333 DETAIL

First Name :	Deborah
Last Name :	Scott
Attachments :	DSEIS-2333_Scott_Original.pdf (430 kb) Marine_Drive_Bike_Lanes.pdf (269 kb)

IBR Draft SEIS - RECORD #2333 DETAIL

Submission Date :	11/17/2024
First Name :	Deborah
Last Name :	Scott
Business/Organization/Agency :	
Attachments :	Marine Drive Bike Lanes.pdf (269 kb)

Submission Input :

IBR Team,

Please see my comments on the Draft SEIS (Marine Drive bike lanes).

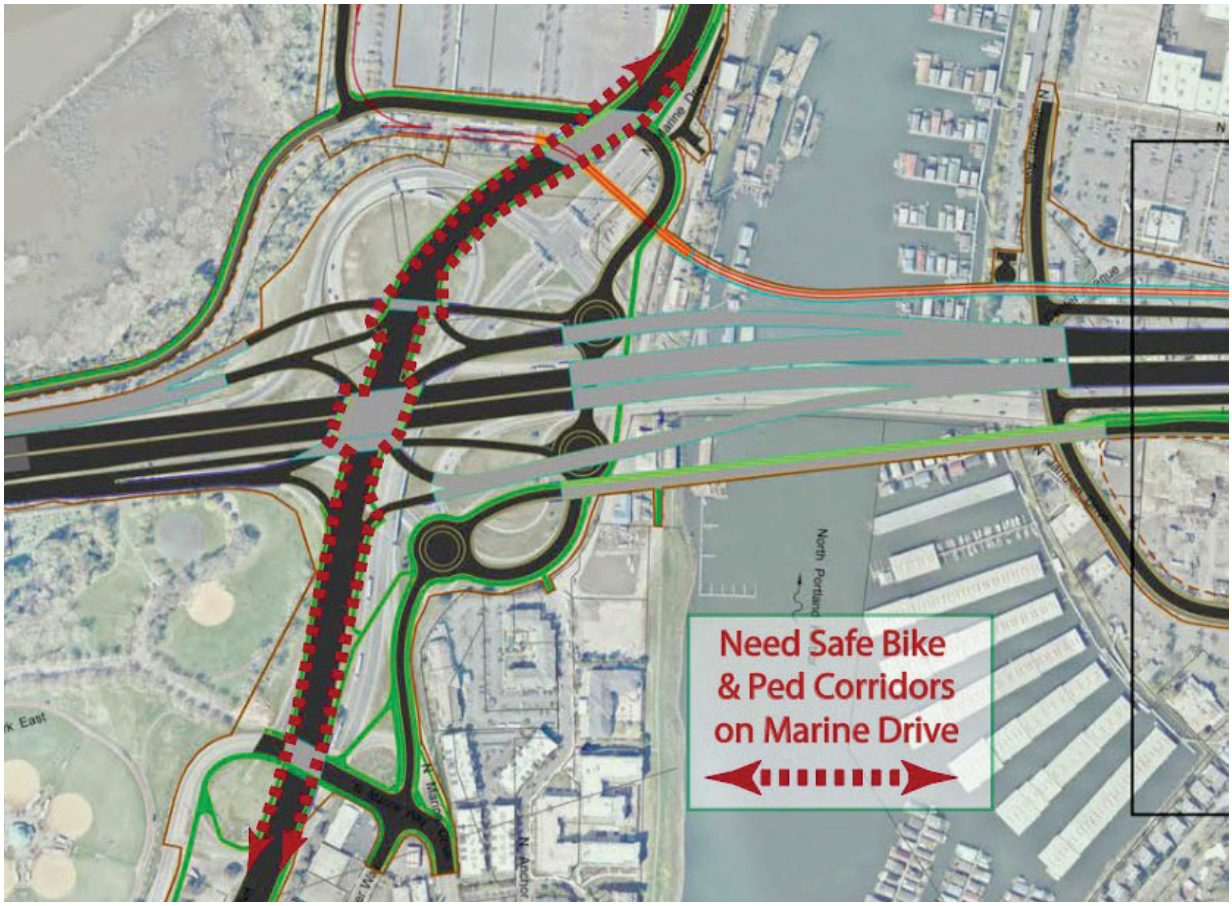
Deb Scott

[redacted]

Comments on Freight and Bike Conflicts on the Marine Drive Single Point Interchange

The IBR proposed design for bike lanes through the Marine Drive single point interchange presents a major conflict between bike and freight movements. As the Marine Drive interchange is one of the most important freight interchanges in the State of Oregon, we request that these pathways for active transportation be built separated from freight movements to provide safe passage for active transportation users.

This meets the purpose and needs of the IBR to (b) improve connectivity, reliability, travel times, and operations of public transportation modal alternatives in the Program area and (c) improve highway freight mobility and address interstate travel and commerce needs in the Program area.



Please study how these corridors could be built separated from the vehicle travel lanes using barriers or raised active transportation pathways. In addition, the IBR should study how to use the new technologies of sensors that detect active transportation user approaching intersections crossings. These advanced sensors triggers traffic signals, so that users crossing through many these intersections does not have to individually press a button at each crossing and wait for the signal to change one crossing at a time.

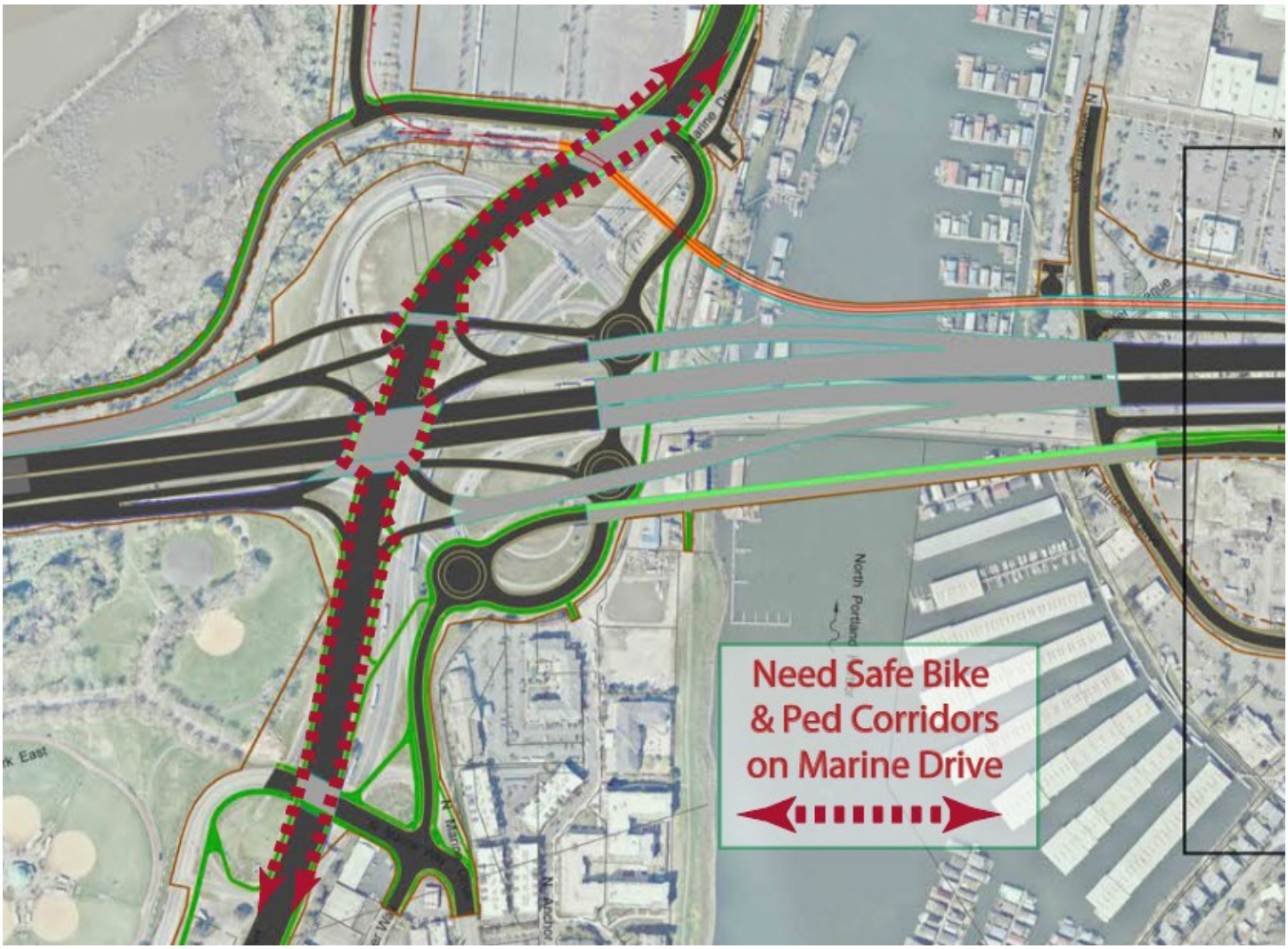
Thank you,

Deborah (Deb) Scott
[redacted]

Comments on Freight and Bike Conflicts on the Marine Drive Single Point Interchange

The IBR proposed design for bike lanes through the Marine Drive single point interchange presents a major conflict between bike and freight movements. As the Marine Drive interchange is one of the most important freight interchanges in the State of Oregon, we request that these pathways for active transportation be built separated from freight movements to provide safe passage for active transportation users.

This meets the purpose and needs of the IBR to (b) improve connectivity, reliability, travel times, and operations of public transportation modal alternatives in the Program area and (c) improve highway freight mobility and address interstate travel and commerce needs in the Program area.



Please study how these corridors could be built separated from the vehicle travel lanes using barriers or raised active transportation pathways. In addition, the IBR should study how to use the new technologies of sensors that detect active transportation user approaching intersections crossings. These advanced sensors triggers traffic signals, so that users crossing through many these intersections does not have to individually press a button at each crossing and wait for the signal to change one crossing at a time.

Thank you,

Deborah (Deb) Scott
4731 SW Admiral St, Portland, OR 97221
dscottnw@comcast.ne

IBR Draft SEIS - RECORD #2334 DETAIL

First Name :	Deborah
Last Name :	Scott
Attachments :	DSEIS_2334_Scott_Origional.pdf (266 kb) Comments_on_Cork_Screw_Ramps.pdf (264 kb)

IBR Draft SEIS - RECORD #2334 DETAIL

Submission Date :	11/17/2024
First Name :	Deborah
Last Name :	Scott
Business/Organization/Agency :	
Attachments :	Comments_on_Cork_Screw_Ramps.pdf (264 kb)

Submission Input :

IBR Team,

Please see my comments on the Draft SEIS (corkscrew ramps).

Deb Scott

[redacted]

Comments on Separating the Multiuse Path Corkscrew Ramps & Light Rail Stations Stair / Elevators

The IBR proposes building the light rail line on the south bound main bridge. The Vancouver shoreline light rail station is approximately 100' in elevation above the ground and is access through stairs and elevators.

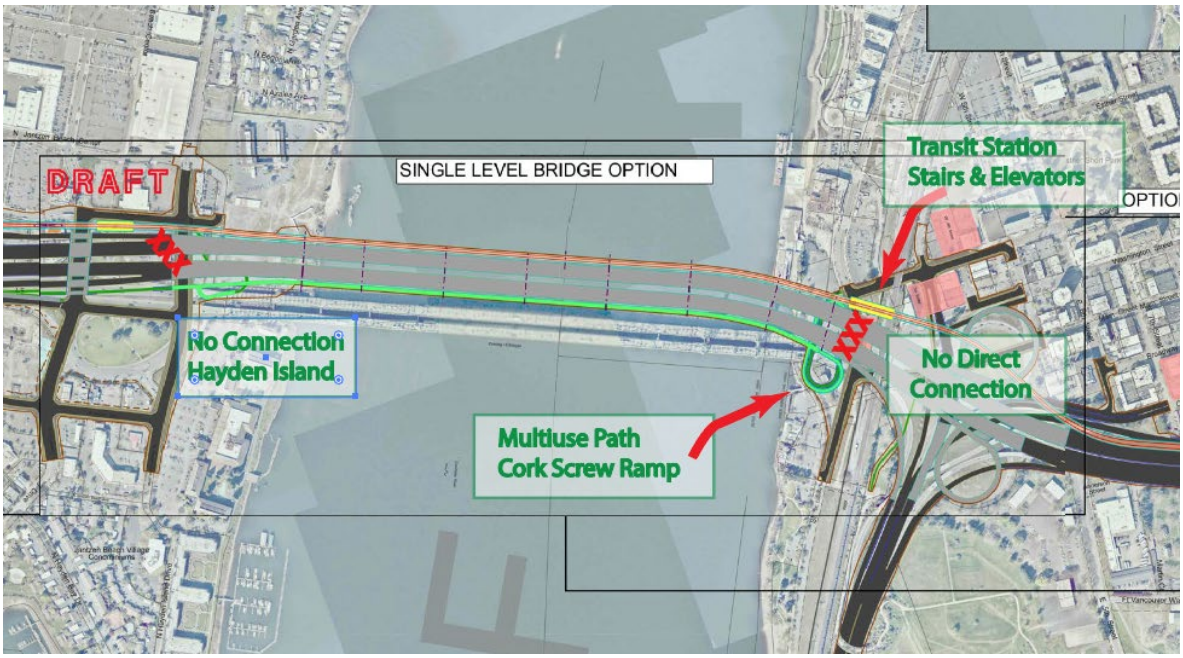
The multiuse path is built on the north bound main bridge span. The end point of the multiuse path on the Vancouver shoreline is approximately 100' in elevation above the ground and is access by a corkscrew ramp of approximately ½ mile in length.

Though the Vancouver shoreline light rail station and the end point of the multiuse trail are adjacent to each other and are both 100' in elevation above the ground, the access systems for each are entirely separate from each other. The stairs and elevators for transit users are not usable for users of the multiuse path. The ramp connection for multiuse path users that are not usable for transit riders.

The Hayden Island light rail station and Oregon side of the main bridge multiuse path has the same disconnection, though the elevation is less at about 35' above ground.

People who are not driving to their destination, a goal of the IBR, will often use several modes to reach their destination. Users may ride their bikes to a light rail station, place their bikes on the train in storage specially design for bikes on the light rail train, then ride their bikes for the final leg of their trip. The IBR design of entirely separate light rail and multiuse path access makes these blended trips difficult.

I believe additional study is needed to connect these two systems together.



Thank you

Deborah (Deb) Scott
[redacted]

Comments on Separating the Multiuse Path Corkscrew Ramps & Light Rail Stations Stair / Elevators

The IBR proposes building the light rail line on the south bound main bridge. The Vancouver shoreline light rail station is approximately 100' in elevation above the ground and is access through stairs and elevators.

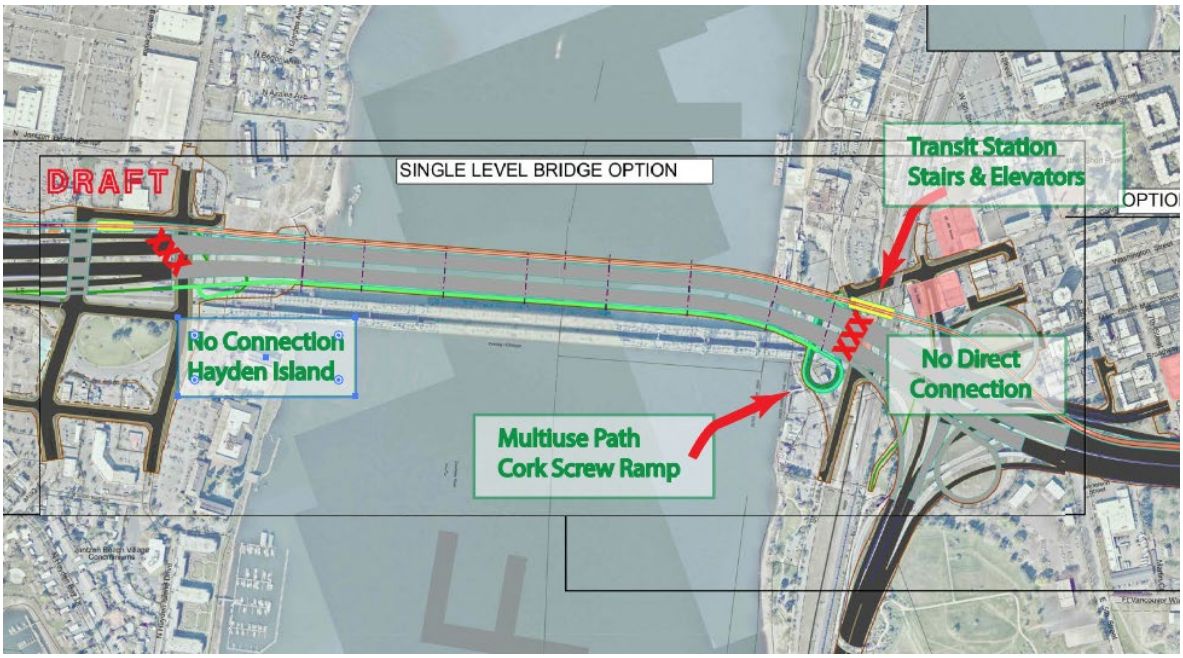
The multiuse path is built on the north bound main bridge span. The end point of the multiuse path on the Vancouver shoreline is approximately 100' in elevation above the ground and is access by a corkscrew ramp of approximately ½ mile in length.

Though the Vancouver shoreline light rail station and the end point of the multiuse trail are adjacent to each other and are both 100' in elevation above the ground, the access systems for each are entirely separate from each other. The stairs and elevators for transit users are not usable for users of the multiuse path. The ramp connection for multiuse path users that are not usable for transit riders.

The Hayden Island light rail station and Oregon side of the main bridge multiuse path has the same disconnection, though the elevation is less at about 35' above ground.

People who are not driving to their destination, a goal of the IBR, will often use several modes to reach their destination. Users may ride their bikes to a light rail station, place their bikes on the train in storage specially design for bikes on the light rail train, then ride their bikes for the final leg of their trip. The IBR design of entirely separate light rail and multiuse path access makes these blended trips difficult.

I believe additional study is needed to connect these two systems together.



Thank you

Deborah (Deb) Scott
4731 SW Admiral Street, Portland, OR 97221
dscottnw@comcast.net

IBR Draft SEIS - RECORD #2335 DETAIL

First Name :	Deborah
Last Name :	Scott
Attachments :	DSEIS-2335_Scott_Original.pdf (176 kb) Comments_Bridge_Architecture.pdf (174 kb)

IBR Draft SEIS - RECORD #2335 DETAIL

Submission Date :	11/17/2024
First Name :	Deborah
Last Name :	Scott
Business/Organization/Agency :	
Attachments :	Comments_Bridge_Architecture.pdf (174 kb)

Submission Input :

IBR Team,

Please see my comments on the Draft SEIS (bridge architecture).

Deb Scott

[redacted]
[redacted]

Comments on the Importance of the
Architectural Design of the New Bridges

Once the project decides whether the main bridges are going to be a single level bridges, stack style bridges or lift style bridges, the IBR project will develop the aesthetic characteristics of the final bridges.

We request that once the bridge configuration is determined the IBR will hold a public process on the final architectural design of not only the main bridges but the entire bridge corridor. This process could be modeled after similar processes that Portland has done in the past for Tilikum Crossing and the new Burnside Bridge. These processes were both led by national design experts in collaboration with local design experts, the project engineers and members of the public to recommend a final bridge architecture to the region's leaders.

We believe the aesthetics of these bridges matter, and that they are an important inspiration that helps move the project forward. The architectural style of the bridges creates a gateway to both Oregon and Washington. The view of the bridges from the Vancouver shoreline and Hayden Island are important to the future developments in those areas.

Should the IBR select the stack bridges as the best option, that bridge structure, even though it is a basic truss, can be executed with finesse. Remember the bridges crossing North Portland Harbor could have architectural significance as well. Imagine driving over the harbor between twin cable-stayed bridges on each side, one beautiful structure holding up the light rail bridge, and its twin holding up the local Harbor bridge.

Even a flat bridge can have architectural significance. How the constraints of the project are resolved in the hands of a talented bridge architect become the bridge's unique beauty.

The region is investing a lot into these bridges that will be part of our environment for a long time. Let's build something we are proud to leave to future generations.

Thank you

Deborah (Deb) Scott
[redacted]

Comments on the Importance of the
Architectural Design of the New Bridges

Once the project decides whether the main bridges are going to be a single level bridges, stack style bridges or lift style bridges, the IBR project will develop the aesthetic characteristics of the final bridges.

We request that once the bridge configuration is determined the IBR will hold a public process on the final architectural design of not only the main bridges but the entire bridge corridor. This process could be modeled after similar processes that Portland has done in the past for Tilikum Crossing and the new Burnside Bridge. These processes were both led by national design experts in collaboration with local design experts, the project engineers and members of the public to recommend a final bridge architecture to the region's leaders.

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Even a flat bridge can have architectural significance. How the constraints of the project are resolved in the hands of a talented bridge architect become the bridge's unique beauty.

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Thank you

Deborah (Deb) Scott
4731 SW Admiral Street, Portland, OR 97221
dscottnw@comcast.net

IBR Draft SEIS - RECORD #2336 DETAIL

First Name :	Mark
Last Name :	Astor
Attachments :	DSEIS_2336_Aster_Origional.pdf (6 kb)

IBR Draft SEIS - RECORD #2336 DETAIL

Submission Date :	11/17/2024
First Name :	Mark
Last Name :	Astor
Business/Organization/Agency :	

Submission Input :

IBR Team,

Please see my comments on the Draft SEIS (synergies).

Mark Astor
[redacted]
[redacted]

IBR Draft SEIS - RECORD #2337 DETAIL

First Name :	Velda
Last Name :	Altig
Attachments :	DSEIS_2337_Altig_Origional.pdf (1 kb)

IBR Draft SEIS - RECORD #2337 DETAIL

Submission Date :	11/17/2024
First Name :	Velda
Last Name :	Altig
Business/Organization/Agency :	

Submission Input :

When considering design, would like to see mass transportation (Max Line) be a part of the bridge plan and structure.

It would seem very short sighted to construct a new bridge without it.

Thank you.

A concerned citizen:

Velda Altig

IBR Draft SEIS - RECORD #2338 DETAIL

First Name :	Mark
Last Name :	Astor
Attachments :	DSEIS_2338_Astor_Origional.pdf (353 kb) MultiUsePath.pdf (351 kb)

IBR Draft SEIS - RECORD #2338 DETAIL

Submission Date :	11/17/2024
First Name :	Mark
Last Name :	Astor
Business/Organization/Agency :	
Attachments :	MultiUsePath.pdf (351 kb)

Submission Input :

IBR Team,

Please see my comments on the Draft SEIS (westside multiloop path).

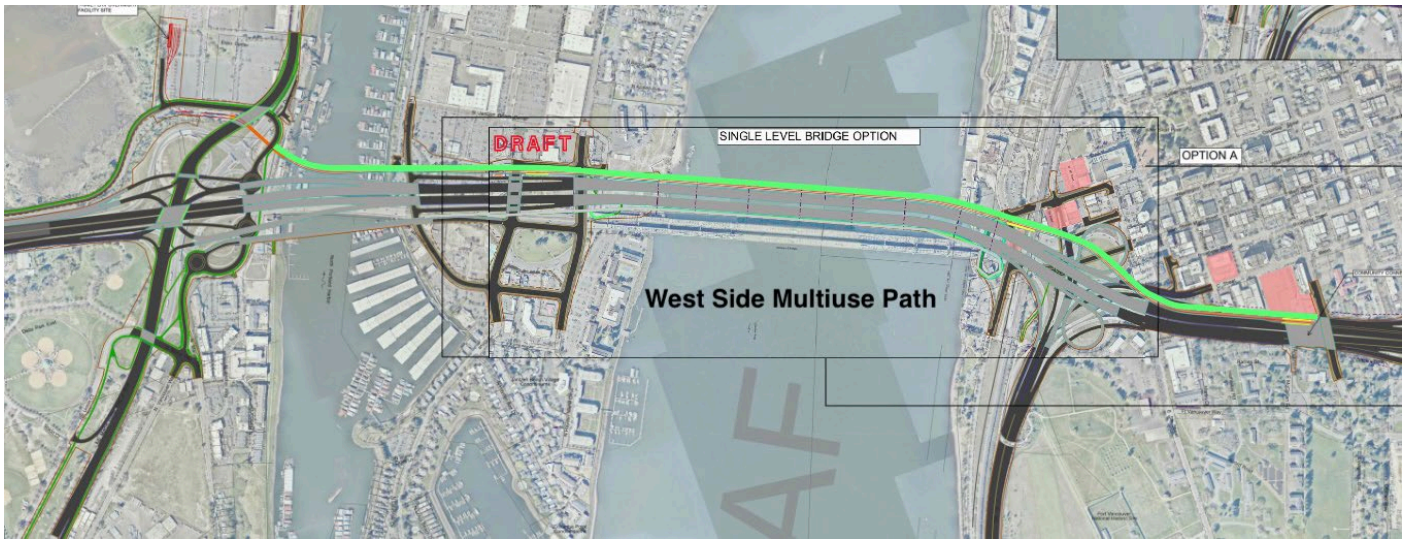
Mark Astor
[redacted]
[redacted]

Comments on Studying Building Both the Multiuse Path and the Light Rail Line on the West Side of the South Bound Main Bridge

The IBR proposes building the light rail line on the south bound main bridge and the multiuse path on the north bound main bridge span. The IBR proposal makes each system separate from each other. The IBR proposal makes connections between these two systems difficult and inefficient for transit and active transportation users.

The IBR proposal has stairs and elevators providing connections for transit users, but the stairs and elevators are not usable for users of the multiuse path. The multiuse path has ramp connections for users that are not usable for transit riders. Though these two systems are parallel to each other, but they are entirely separated systems. These systems do not connect easily even though active transportation users want to connect to transit.

I believe additional study is needed to connect these two systems together. People who are not driving to their destination, a goal of the IBR, will often use several modes to reach their destination. Users may ride their bikes to a light rail station, place their bikes on the train in storage specially design for bikes on the light rail train, then ride their bikes for the final leg of their trip. The IBR design of entirely separate light rail and multiuse path makes these blended trips difficult.



One idea that needs to be studied more is to build the multiuse path next to the light rail alignment on the south bound main bridge. Compared to the multiuse path on the east side of the main bridge, the multiuse path on the west side next to the light rail alignment better meets the purpose and needs statement for the IBR to (b) improve connectivity, reliability, travel times, and operations of public transportation modal alternatives in the Program area. The west side alignment provides the following improvements:

- Seamless transition: Users should easily switch between transit and active transportation at any station, with no grade changes or distance barriers.
- Shared elevator access: Allowing active transportation users to share transit station elevators eliminates the need for additional infrastructure, making the design more efficient and accessible.

- Creates redundant ways to connect to both transit and multiuse path: If the elevator is not working, users can use the ramp or stairs. Users not able to negotiate going up the long ramps can use the elevator. Bike users who get a flat tire on the multiuse path can connect to the light rail station and still get to their destination.
- Provides eyes on the path: Transit operators and passengers provide a continuous presence, reducing the isolation felt on a multiuse path and enhancing safety and comfort.
- Better emergency egress: The multiuse path should double as an emergency exit route for the transit way, supporting user safety during unexpected events.
- Inclusive design principles: These principles ensure the accessibility and usability of both transit and active transportation facilities for individuals of all abilities.
- By building the multiuse path on the west side of the light rail trackway provides greater separation from vehicle noise and would offer a more pleasant experience for active transportation users compared to a multiuse path on the east side immediately next to vehicle travel.
- If the multiuse path was built next to the light rail line on the light rail bridge crossing North Portland Harbor, then the multiuse path connection to the 40-Mile Loop would be direct rather than out of direction when the multiuse path is on the local Harbor Bridge.

Regarding Views: There is a good view of Mt Hood if the multiuse path in on the east side of the north bound main bridge, however there is a good view to the west too. Additionally, a quality view of North Portland Harbor and Mt Hood views could be experienced on the local harbor bridge, but the IBR proposes the multiuse path on the west side of that local Harbor Bridge. The IBR also shows a sidewalk on the east side of the local Harbor Bridge. We propose that the side walk on the east side of the Local Harbor Bridge be as wide as possible and include wide spots for stopping on the route to rest and appreciate one of the region's best view of North Portland Harbor.

View East from Local Harbor Bridge

Thank you,
Mark Astor
[redacted]

Comments on Studying Building Both the Multiuse Path and the Light Rail Line on the West Side of the South Bound Main Bridge

The IBR proposes building the light rail line on the south bound main bridge and the multiuse path on the north bound main bridge span. The IBR proposal makes each system separate from each other. The IBR proposal makes connections between these two systems difficult and inefficient for transit and active transportation users.

The IBR proposal has stairs and elevators providing connections for transit users, but the stairs and elevators are not usable for users of the multiuse path. The multiuse path has ramp connections for users that are not usable for transit riders. Though these two systems are parallel to each other, but they are entirely separated systems. These systems do not connect easily even though active transportation users want to connect to transit.

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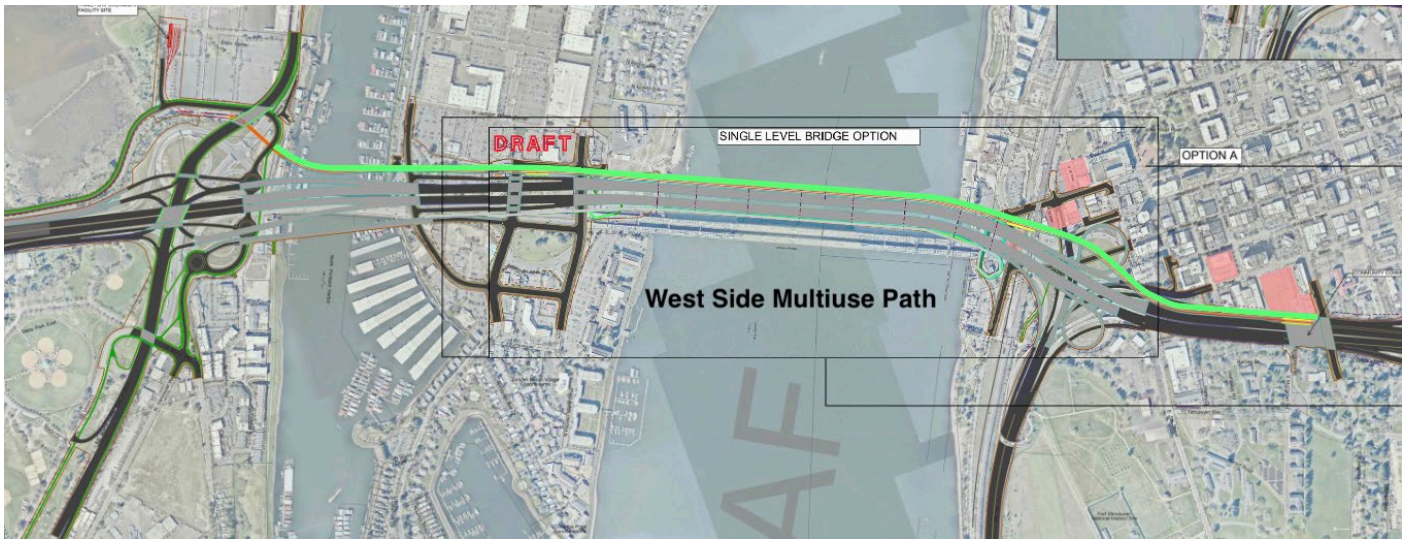

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View East from Local Harbor Bridge

Thank you,
Mark Astor
4731 SW Admiral Street, Portland, OR 97221
ascotnw@comcast.net

IBR Draft SEIS - RECORD #2339 DETAIL

First Name :	Mark
Last Name :	Astor
Attachments :	DSEIS_2339_Astor_Origional.pdf (250 kb) VancouverDip.pdf (247 kb)

IBR Draft SEIS - RECORD #2339 DETAIL

Submission Date :	11/17/2024
First Name :	Mark
Last Name :	Astor
Business/Organization/Agency :	
Attachments :	VancouverDip.pdf (247 kb)

Submission Input :

IBR Team,

Please see my comments on the Draft SEIS (the Vancouver Dip).

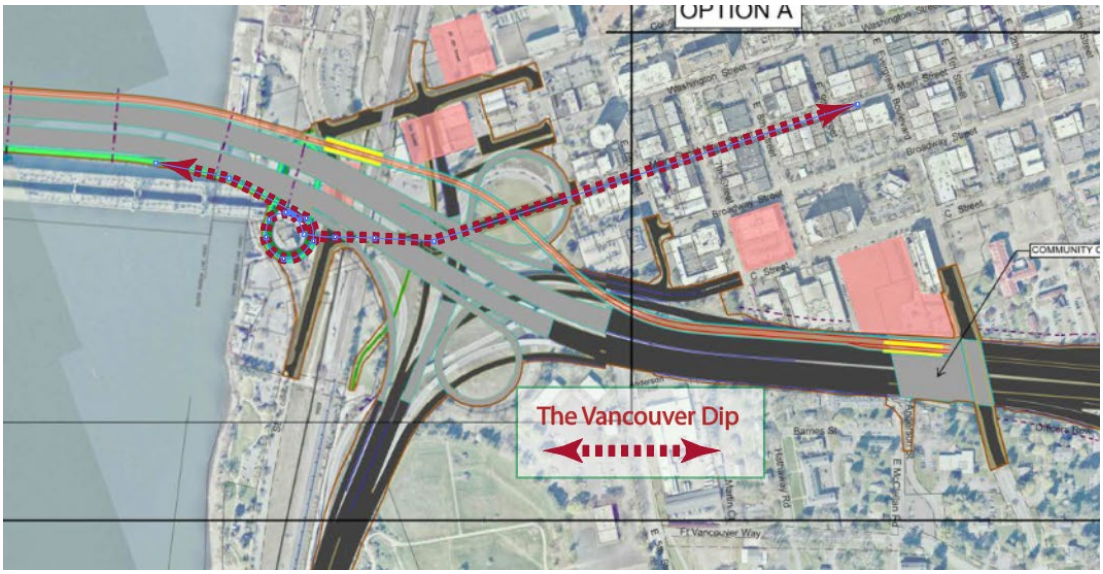
Mark Astor

[redacted]
[redacted]

Comments on the out of direction way active transportation Users Connect to the Multi-Use Path on the Vancouver shoreline: The Vancouver Dip.

If you are traveling by active transportation from central Vancouver, you must first travel down grade to the Vancouver shoreline, then travel up the long spiral ramp to connect to the main bridge multi use path. People who have been studying the IBR ideas often referred to this as the Vancouver Dip.

This is a significant barrier that will discourage use of active transportation due to the extra effort needed to travel down grade from central Vancouver to the shoreline, then up a long ramp to go south on the multiuse path. Northbound travel by active transportation users would experience the same Vancouver Dip in reverse.



The Vancouver Dip does not meet the IBR purpose and need to; (b) improve connectivity, reliability, travel times, and operations of public transportation modal alternatives in the Program area.

To better meet the purpose and need, additional study is needed to see if the multiuse path could be extended to the next light rail station, which is proposed to be a transit hub for Vancouver. This transit hub brings together the new light rail line extension and several BRT lines. Adding a direct connection to the multiuse path at this transit hub would encourage active users and facilitate active transportation users using both transit and biking efficiently for their complete non-auto trip. This would eliminate the Vancouver Dip.

One idea that needs additional study that would alleviate the disconnection between transit and active transportation users is to place the multi-use path and the transit line next to each other on the west side of the southbound main bridge. This idea of the west side multiuse path will be discussed more in a separate comment.

Thank you,

Mark Astor
[redacted]

Comments on the out of direction way active transportation Users Connect to the Multi-Use Path on the Vancouver shoreline: The Vancouver Dip.

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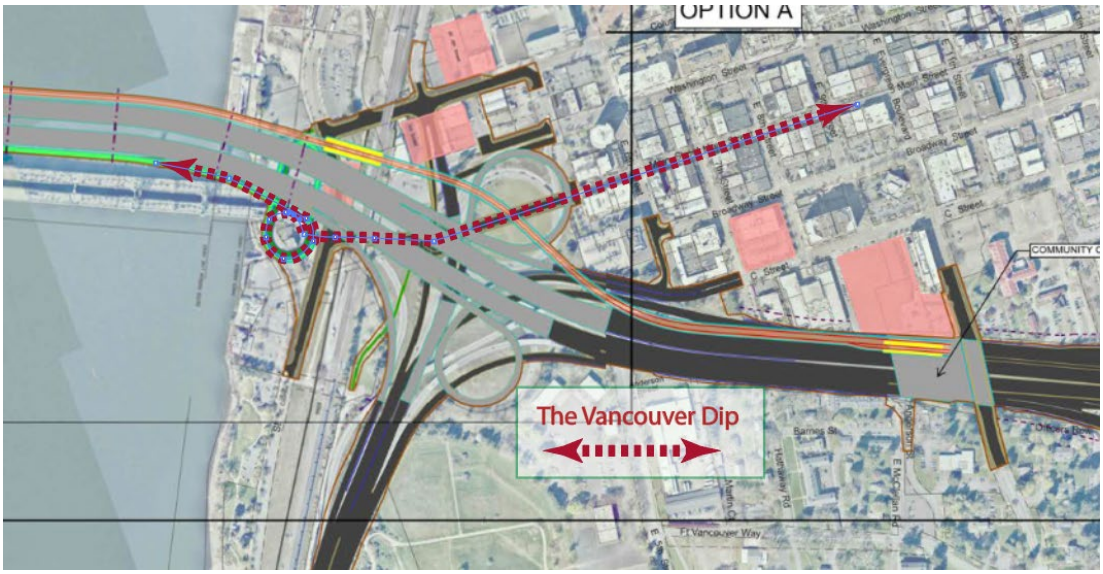

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Thank you,

Mark Astor
4731 SW Admiral Street, Portland, OR, 97221
ascotnw@comcast.net

IBR Draft SEIS - RECORD #2340 DETAIL

First Name :	Mark
Last Name :	Astor
Attachments :	DSEIS-2340_Astor_Original.pdf (504 kb)

IBR Draft SEIS - RECORD #2340 DETAIL

Submission Date :	11/17/2024
First Name :	Mark
Last Name :	Astor
Business/Organization/Agency :	
Attachments :	The 40 Mile Loop Connections_.pdf (505 kb)

Submission Input :

IBR Team,

Please see my comments on the Draft SEIS (40 Mile Loop connections).

Comments on IBR Multi-Use path Connections to the 40-Mile Loop East/West Corridor
The 40-Mile Loop is a comprehensive regional trail system forming a central hub that connects nearly all other regional trails and parks within Multnomah County. The Loop alignment has been planned and incorporated into regional land use frameworks for over 40 years. While the trail alignment for the 40-Mile Loop has long been established, certain easements remain unacquired, and some portions of the trail are yet to be constructed.

The adopted alignment of the 40-Mile Loop passes through the area impacted by the Interstate Bridge Replacement (IBR) project. While the IBR project provides several benefits to the 40-Mile Loop, I believe additional study is warranted to make the proposed trails safer and more usable. IBR Positive Contributions to the 40-Mile Loop Trail. The IBR project will construct the segment of the 40-Mile Loop within the project area. This new trail segment will provide a safe, separated trail connecting the existing 40-Mile Loop trail located west of the proposed bridges through the project area, under the many new IBR bridges emanating from mainland Portland.

After crossing under the local Harbor Bridge, the east most bridge proposed, the
IBR will stub out the trail to the east for a future connection to the Bridgeton Trails segment of the 40-Mile Loop. This is a good trail addition to the 40-Mile Loop.
Concerns with the Proposed Connection of 40-Mile Loop to the multiuse path on the local Harbor Bridge. However, the proposed trail connections from the multiuse path on the local Harbor Bridge to the new 40-Mile Loop segment is not optimal. The proposed design requires users to travel out of their way, navigating a traffic circle and crossing vehicle lanes to reach both the eastbound and the westbound trail connection. This routing is neither convenient nor efficient and could discourage its use.

Request for Further Study of better East and West Connections to the 40-Mile Loop
I strongly recommend that alternative design options be considered to provide a more direct, connection to and from the east and west to the local Harbor Bridge multiuse path. Possible additional study include:
1) Creating a direct connection from the east stub of the Bridgeton Trail to the sidewalk on the east side of the local Harbor Bridge. This direct connection would make it easier and more appealing for cyclists and pedestrians to cross the Harbor Bridge, while also offering a scenic route with views of North Portland Harbor and Mt Hood.
2) Additionally, I request that the sidewalk on the east side of the local Harbor Bridge be designed to be as wide

as possible, with areas to rest and enjoy the views, further enhancing the experience for users.
3) Study more direct trail connections from the local Harbor Bridge multi use path to both the east and the west that do not involve routes around the Marine Drive traffic circles and crossing travel lanes.
4) Study routing the IBR entire multiuse path on the west side of the bridges rather than the east side. If the multiuse path was located on the light rail bridge on the west side, the east and west connection would be straight forward and direct. The west side multiuse path is discussed more in a separate comment.
5) Lastly, I have submitted a separate comment on ways the IBR could facilitate more just a stub for the east side connection to the Bridgeton Trail segment of the 40-Mile Loop.

Mark Astor
[redacted]
[redacted]

Comments on IBR Multi-Use path Connections to the 40-Mile Loop East/West Corridor

The 40-Mile Loop is a comprehensive regional trail system forming a central hub that connects nearly all other regional trails and parks within Multnomah County. The Loop alignment has been planned and incorporated into regional land use frameworks for over 40 years. While the trail alignment for the 40-Mile Loop has long been established, certain easements remain unacquired, and some portions of the trail are yet to be constructed.

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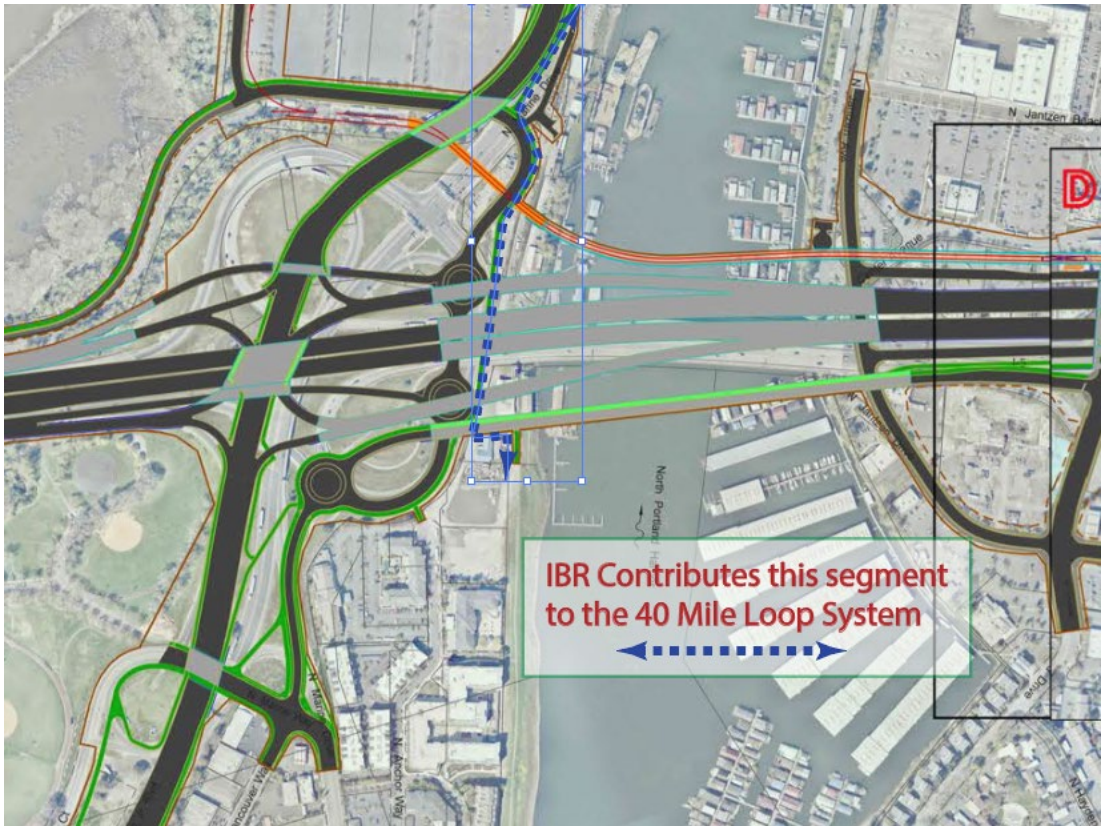
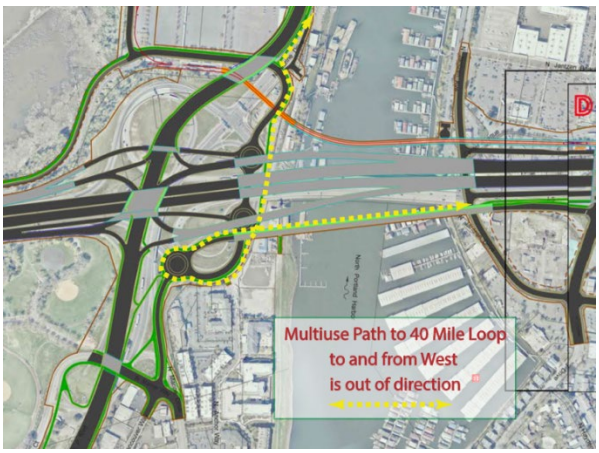
IBR Positive Contributions to the 40-Mile Loop Trail

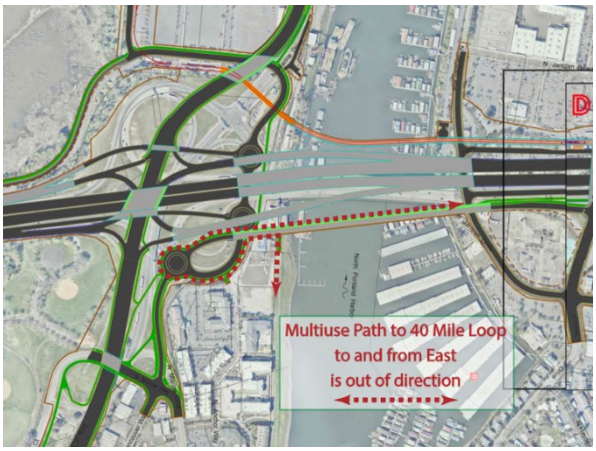
The IBR project will construct the segment of the 40-Mile Loop within the project area. This new trail segment will provide a safe, separated trail connecting the existing 40-Mile Loop trail located west of the proposed bridges through the project area, under the many new IBR bridges emanating from mainland Portland. After crossing under the local Harbor Bridge, the east most bridge proposed, the IBR will stub out the trail to the east for a future connection to the Bridgeton Trails segment of the 40-Mile Loop. This is a good trail addition to the 40-Mile Loop.



Concerns with the Proposed Connection of 40-Mile Loop to the multiuse path on the local Harbor Bridge

However, the proposed trail connections from the multiuse path on the local Harbor Bridge to the new 40-Mile Loop segment is not optimal. The proposed design requires users to travel out of their way, navigating a traffic circle and crossing vehicle lanes to reach both the eastbound and the westbound trail connection. This routing is neither convenient nor efficient and could discourage its use.





Request for Further Study of better East and West Connections to the 40-Mile Loop

I strongly recommend that alternative design options be considered to provide a more direct, connection to and from the east and west to the local Harbor Bridge multiuse path.

Possible additional study include:

1) Creating a direct connection from the east stub of the Bridgeton Trail to the sidewalk on the east side of the local Harbor Bridge. This direct connection would make it easier and more appealing for cyclists and pedestrians to cross the Harbor Bridge, while also offering a scenic route with views of North Portland Harbor and Mt Hood.
2) Additionally, I request that the sidewalk on the east side of the local Harbor Bridge be designed to be as wide as possible, with areas to rest and enjoy the views, further enhancing the experience for users.
3) Study more direct trail connections from the local Harbor Bridge multi use path to both the east and the west that do not involve routes around the Marine Drive traffic circles and crossing travel lanes.
4) Study routing the IBR entire multiuse path on the west side of the bridges rather than the east side. If the multiuse path was located on the light rail bridge on the west side, the east and west connection would be straight forward and direct. The west side multiuse path is discussed more in a separate comment.

5) Lastly, I have submitted a separate comment on ways the IBR could facilitate more just a stub for the east side connection to the Bridgeton Trail segment of the 40-Mile Loop.

Thank you,

Mark Astor
[redacted]

IBR Draft SEIS - RECORD #2341 DETAIL

First Name :	Mark
Last Name :	Astor
Attachments :	DSEIS-2341_Astor_Original.pdf (500 kb)

IBR Draft SEIS - RECORD #2341 DETAIL

Submission Date :	11/17/2024
First Name :	Mark
Last Name :	Astor
Business/Organization/Agency :	
Attachments :	Separating Freight & Bike Travel_.pdf (501 kb)

Submission Input :

IBR Team,

Please see my comments on the Draft SEIS (separating freight and bikes).

Separating Freight and Bike Travel on the Marine Drive Interchange and On-Ramps
One important purpose and need of the IBR is to (c) improve highway freight mobility and address interstate travel and commerce needs in the Program area.

Another important purpose and need is to (b) improve connectivity, reliability, travel times, and operations of public transportation modal alternatives in the Program area. A way to meet the purpose and needs of both freight users and active transportation users is to build active transportation routes physically separated from Freight routes as much as possible. Maximizing this separation is key to creating efficient Freight routes while creating safer, more attractive, and therefore more heavily used walking, rolling, and biking routes. Examples of Conflicts between Freight and Active Transportation users. The proposed IBR design for the ramp from Vancouver Way to MLK North poses significant conflict between freight and bikes, as the proposed bike route travels changes grade along a switch back,
crosses a major freight intersection and climbs a grade up along a freight-heavy on-ramp.

Another example of possible freight-bike conflict is in the Marine Drive Interchange. Here IBR proposes to build a complete bike lanes and pedestrian sidewalk on both sides of the interchange. Even if the IBR is required by State law to provide bike and pedestrian facilities on the Marine Drive interchange, we recommend additional study on improving two aspects of these improvements:

1) Any facilities for bike and ped that must be built on Marine Drive needs to be built in a way that separates bike and ped travel from freight as much as possible using techniques such as barriers and raised bike roadways.
2) To discourage any active transportation users from crossing the Marine Drive interchange, also build alternative routes that go around the Marine Drive Interchange rather than through the interchange. This separate bike ped system needs be so well design that it becomes the preferred route. Current IBR design has the MLK active user connection provided partially along MLK shoulders and partially on separated trails. To become the preferred route, an active transportation route that is not reliant of MLK shoulders need to be developed.

This separated preferred corridor needs to conveniently link to each of the existing regional bike corridors. Complete separation creates safety for both the people that are walking, biking and rolling in this area, but also makes it safer and more efficient for freight users who don’t have to worry about negotiating on ramps with

curves and with grade changes while watching out for bike users traveling the exact same routes. This separation better meets 3 parts of the purpose and needs statement of the IBR: (a) improve travel safety and traffic operations on the I-5 river crossing and associated interchanges; (b) improve connectivity, reliability, travel times, and operations of public transportation modal alternatives in the Program area; and (c) improve highway freight mobility and address interstate travel and commerce needs in the Program area. Given the Marine Drive interchange is usually described as the most heavily used freight corridor in Oregon, we encourage the IBR to work with the active transportation users in combination with the freight users together rather than separately to refine designs that efficiently moves freight users through the Marine Drive interchange and active transportation users around the interchange.

Mark Astor
[redacted]

Separating Freight and Bike Travel on the Marine Drive Interchange and On-Ramps

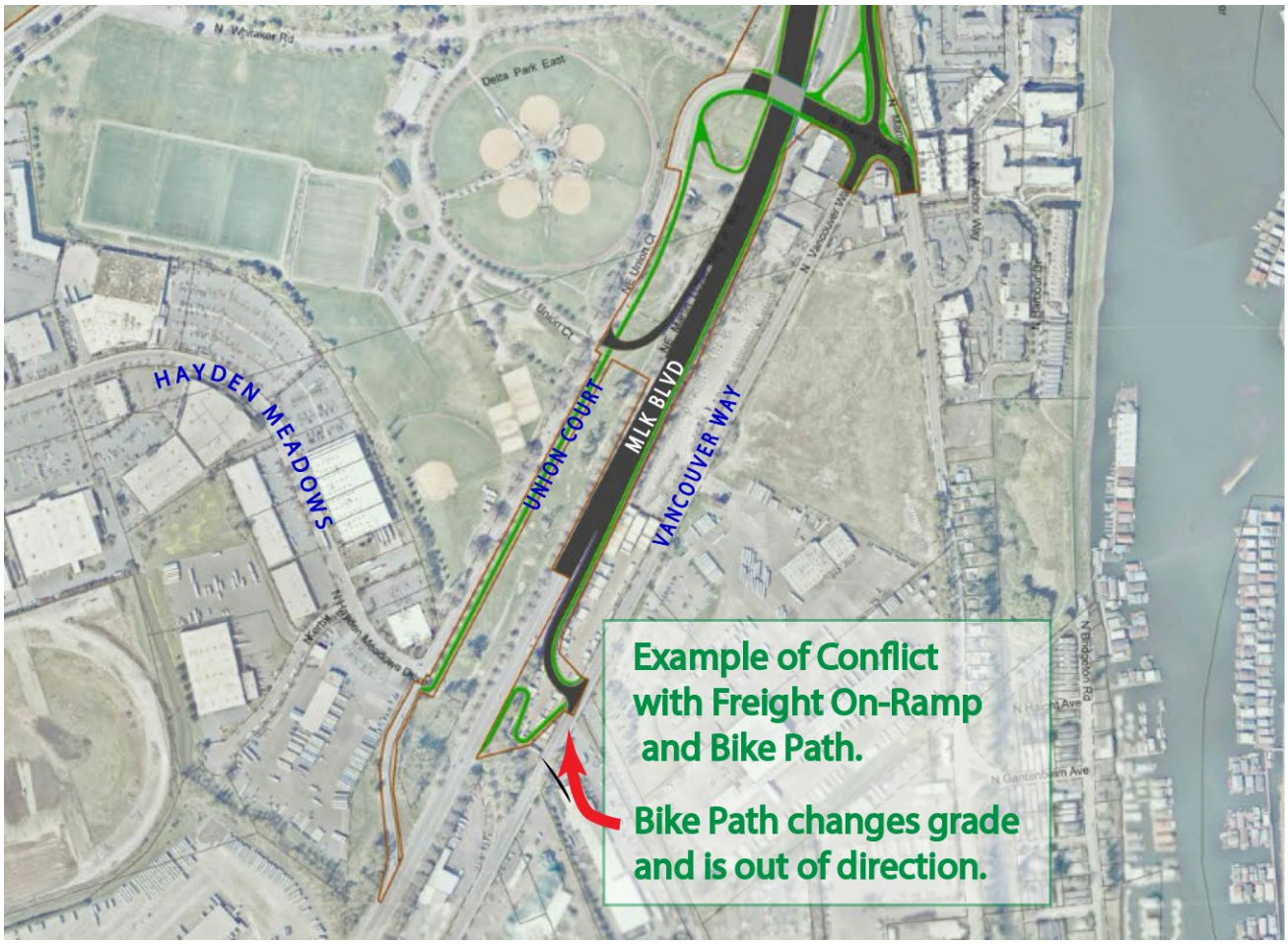
One important purpose and need of the IBR is to (c) improve highway freight mobility and address interstate travel and commerce needs in the Program area.

Another important purpose and need is to (b) improve connectivity, reliability, travel times, and operations of public transportation modal alternatives in the Program area.

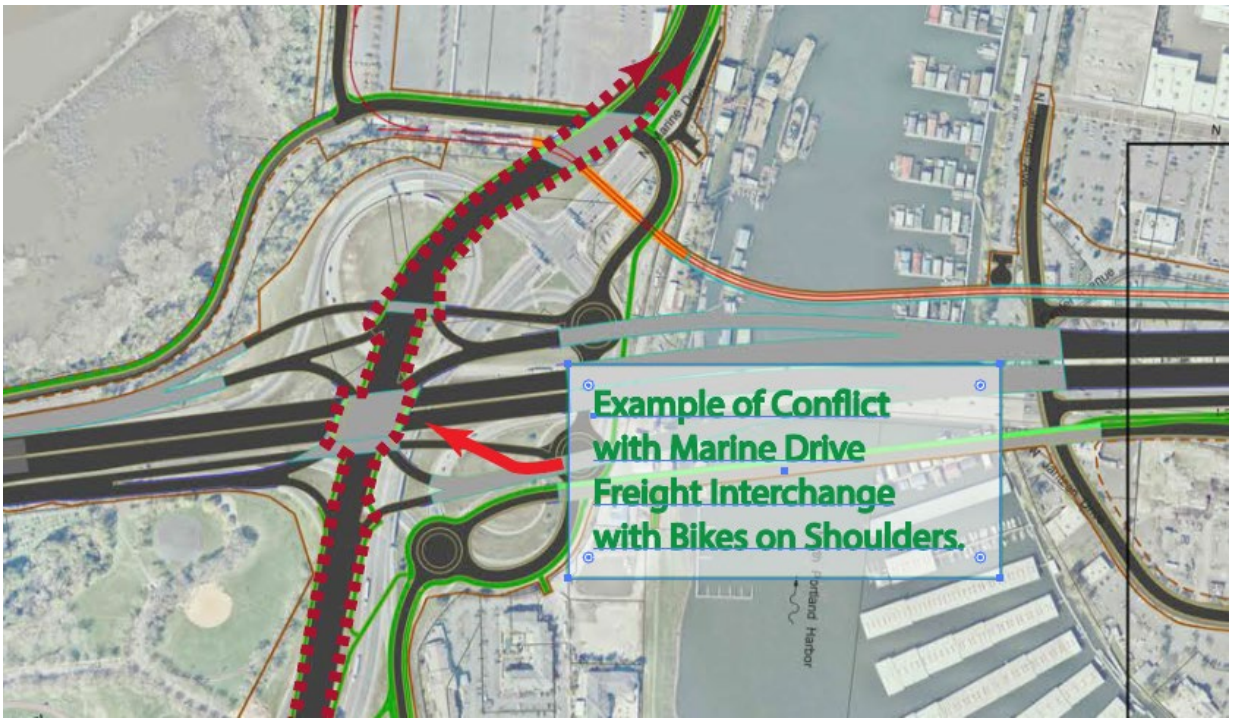
A way to meet the purpose and needs of both freight users and active transportation users is to build active transportation routes physically separated from Freight routes as much as possible. Maximizing this separation is key to creating efficient Freight routes while creating safer, more attractive, and therefore more heavily used walking, rolling, and biking routes.

Examples of Conflicts between Freight and Active Transportation users.

The proposed IBR design for the ramp from Vancouver Way to MLK North poses significant conflict between freight and bikes, as the proposed bike route travels changes grade along a switch back, crosses a major freight intersection and climbs a grade up along a freight-heavy on-ramp.



Another example of possible freight-bike conflict is in the Marine Drive Interchange. Here IBR proposes to build a complete bike lanes and pedestrian sidewalk on both sides of the interchange.



Even if the IBR is required by State law to provide bike and pedestrian facilities on the Marine Drive interchange, we recommend additional study on improving two aspects of these improvements:

1) Any facilities for bike and ped that must be built on Marine Drive needs to be built in a way that separates bike and ped travel from freight as much as possible using techniques such as barriers and raised bike roadways.

2) To discourage any active transportation users from crossing the Marine Drive interchange, also build alternative routes that go around the Marine Drive Interchange rather than through the interchange. This separate bike ped system needs be so well design that it becomes the preferred route. Current IBR design has the MLK active user connection provided partially along MLK shoulders and partially on separated trails. To become the preferred route, an active transportation route that is not reliant of MLK shoulders need to be developed. This separated preferred corridor needs to conveniently link to each of the existing regional bike corridors.

Complete separation creates safety for both the people that are walking, biking and rolling in this area, but also makes it safer and more efficient for freight users who don't have to worry about negotiating on ramps with curves and with grade changes while watching out for bike users traveling the exact same routes.

This separation better meets 3 parts of the purpose and needs statement of the IBR: (a) improve travel safety and traffic operations on the I-5 river crossing and associated interchanges; (b) improve connectivity, reliability, travel times, and operations of public transportation modal alternatives in the Program area; and (c) improve highway freight mobility and address interstate travel and commerce needs in the Program area.

Given the Marine Drive interchange is usually described as the **most heavily used freight corridor in Oregon**, we encourage the IBR to work with the active transportation users in combination with the freight users **together rather than separately** to refine designs that efficiently moves freight users through the Marine Drive interchange and active transportation users around the interchange.

Thank you,

Mark Astor
[redacted]

IBR Draft SEIS - RECORD #2342 DETAIL

First Name :	Mark
Last Name :	Astor
Attachments :	DSEIS-2342_Astor_Original.pdf (450 kb)

IBR Draft SEIS - RECORD #2342 DETAIL

Submission Date :	11/17/2024
First Name :	Mark
Last Name :	Astor
Business/Organization/Agency :	
Attachments :	MLK Undercrossing_.pdf (450 kb)

Submission Input :

IBR Team,

Please see my comments on the Draft SEIS (MKL undercrossing).

The MLK Undercrossing and Complete Interchange Better Freight & Neighborhood Access Ramps for the IBR Initial Proposed Design for MLK Access Ramps. The Interstate Bridge Replacement (IBR) proposes a Martin Luther King (MLK) on-ramp and off-ramp design that meets very minimal requirements:
1) These ramps replace the existing ramp connections.
2) These ramps merge vehicles onto MLK further away from the Marine Drive single point intersection improving the merge/weave problems with the current intersection.
But this minimal ramp design does not align with other important goals for Portland, including efficient regional freight movement, recreational park safety, and understandable way finding.

Problems with the proposed MLK ramp design
1) The proposed ramp design creates out of direction travel.
2) The proposed design is confusing to navigate. A traveler will take the off-ramp to leave the Marine Drive / MLK interchange, but not clearly see how to get back onto the Marine Drive / MLK interchange. There is the same way finding confusion in reverse
3) The proposed MLK off-ramp conflicts with Delta Park's primary recreational entrance. Since this a major Freight travel ramp, this ramp should not conflict with the major access to a major recreational area.
4) The proposed MLK ramp encourages freight movement to use East Marine Drive for access when the Freight Master Plan wants freight travel to use Columbia Blvd to MLK for freight access rather than East Marine Drive, which is a local neighborhood roadway.

Proposal - MLK Undercrossing and Complete Intersection.
There is a better design to meet all of IBR requirements while also meeting broader Portland's freight, neighborhood, and parks planning goals. This new ramp design proposes an undercrossing under MLK connecting Hayden Meadows Drive to Vancouver Way. This new MLK undercrossing combined with slightly relocated MLK on-ramps and off-ramps has the following advantages:
1) The complete MLK Intersection minimizes out of direction travel.
2) The complete MLK intersection removes Freight users from the main Delta Park Entrance.
3) This design would be easier to navigate. It is more understandable for freight and other users just how to get on and off MLK and the access the Marine Drive Interchange.
4) The new undercrossing meets the purpose and need of the IBR: (a) improve travel safety and traffic operations on the I-5 river crossing and associated interchanges; (c) improve highway freight mobility and address interstate travel and commerce needs in the program. The MLK undercrossing designs meets the

purpose and needs better than the minimal IBR ramp design.
5) Lastly, the MLK undercrossing provides a new way to access the Hayden Meadows Drive commercial shopping area. This new access could help off-set the removal of the direct access to Hayden Meadows that exist today from the current Marine Drive intersection to I-5 South to Interstate Ave off ramp. This existing off ramp connection from Marine Drive south bound on-ramp to Interstate Ave was removed to provide for the new braided ramp from Marine Drive to I-5. This Interstate Avenue ramp connection from I-5 still exits if someone is on the main line of I-5. However Marine Drive travelers on the local Portland system wanting to access Interstate Ave in the IBR proposed design would have to travel through the three new Marine Drive traffic circles, then to Expo Road then connect to Interstate Avenue. The MLK undercrossing design would create another more direct way to get to Hayden Meadows Drive and Interstate Avenue.

IBR's Response to Building the MLK Undercrossing: Have Portland Fund This – Not the IBR. This undercrossing has been proposed to the IBR early in the design process. IBR has stated that a MLK undercrossing might be nice to have but that the undercrossing should be something that City of Portland funds later.

A complete MLK undercrossing and ramp design is more appropriate to be included in the IBR funding package. This undercrossing improves freight connections for this intersection described as Oregon's most important freight interchange. The MLK undercrossing excels at meeting the IBR purpose and need (c) improve highway freight mobility. IBR building a minimally acceptable ramp design and suggest the local city come back later and rebuild the preferred connection is not good public policy.

The cost of the undercrossing would be an exceptionally large funding request for Portland. The undercrossing is more appropriate to be funded in the budget for a project that describes itself as building a bridge to meet the needs for the next 100 years.

Please study the MLK undercrossing and full interchange design. Involve the freight community, residents, PBOT, and PP&R. Let's work together to refine a ramp and
undercrossing design that excels at meeting Section C of the Purpose and Need of the IBR to improve freight mobility.

Thank you,

Mark Astor
[redacted]
[redacted]

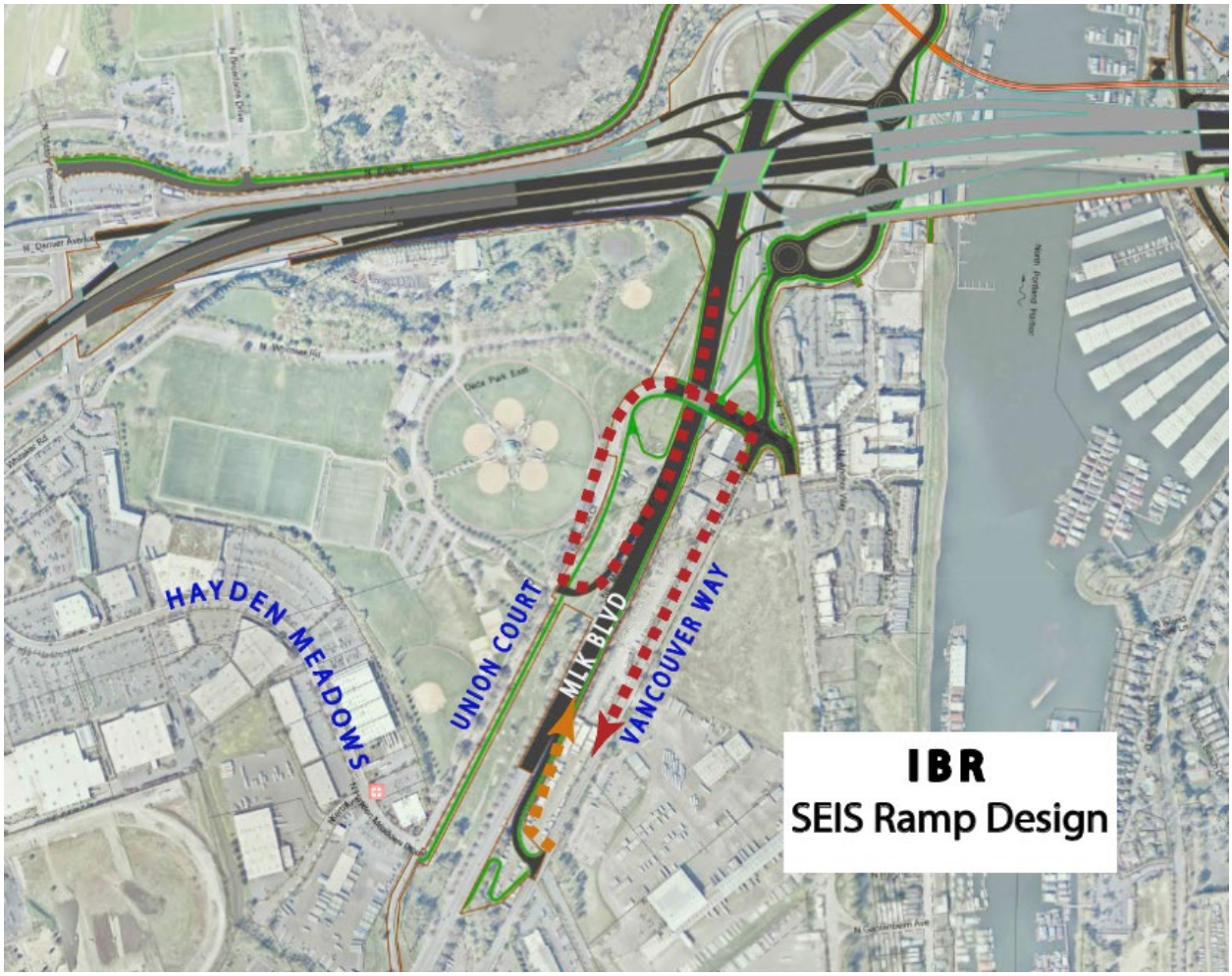
The MLK Undercrossing and Complete Interchange
Better Freight & Neighborhood Access Ramps for the IBR

Initial Proposed Design for MLK Access Ramps

The Interstate Bridge Replacement (IBR) proposes a Martin Luther King (MLK) on-ramp and off-ramp design that meets very minimal requirements:

1) These ramps replace the existing ramp connections.
2) These ramps merge vehicles onto MLK further away from the Marine Drive single point intersection improving the merge/weave problems with the current intersection.

But this minimal ramp design does not align with other important goals for Portland, including efficient regional freight movement, recreational park safety, and understandable way finding.



Problems with the proposed MLK ramp design

1) The proposed ramp design creates out of direction travel.
2) The proposed design is confusing to navigate. A traveler will take the off-ramp to leave the Marine Drive / MLK interchange, but not clearly see how to get back onto the Marine Drive / MLK interchange. There is the same way finding confusion in reverse

3) The proposed MLK off-ramp conflicts with Delta Park's primary recreational entrance. Since this a major Freight travel ramp, this ramp should not conflict with the major access to a major recreational area.
4) The proposed MLK ramp encourages freight movement to use East Marine Drive for access when the Freight Master Plan wants freight travel to use Columbia Blvd to MLK for freight access rather than East Marine Drive, which is a local neighborhood roadway.

Proposal - MLK Undercrossing and Complete Intersection

There is a better design to meet all of IBR requirements while also meeting broader Portland's freight, neighborhood, and parks planning goals.

This new ramp design proposes an undercrossing under MLK connecting Hayden Meadows Drive to Vancouver Way. This new MLK undercrossing combined with slightly relocated MLK on-ramps and off-ramps has the following advantages:

1) The complete MLK Intersection minimizes out of direction travel.
2) The complete MLK intersection removes Freight users from the main Delta Park Entrance.
3) This design would be easier to navigate. It is more understandable for freight and other users just how to get on and off MLK and the access the Marine Drive Interchange.

4) The new undercrossing meets the purpose and need of the IBR: (a) improve travel safety and traffic operations on the I-5 river crossing and associated interchanges; (c) improve highway freight mobility and address interstate travel and commerce needs in the program. The MLK undercrossing designs meets the purpose and needs better than the minimal IBR ramp design.
5) Lastly, the MLK undercrossing provides a new way to access the Hayden Meadows Drive commercial shopping area. This new access could help off-set the removal of the direct access to Hayden Meadows that exist today from the current Marine Drive intersection to I-5 South to Interstate Ave off ramp. This existing off ramp connection from Marine Drive south bound on-ramp to Interstate Ave was removed to provide for the new braided ramp from Marine Drive to I-5. This Interstate Avenue ramp connection from I-5 still exits if someone is on the main line of I-5. However Marine Drive travelers on the local Portland system wanting to access Interstate Ave in the IBR proposed design would have to travel through the three new Marine Drive traffic circles, then to Expo Road then connect to Interstate Avenue. The MLK undercrossing design would create another more direct way to get to Hayden Meadows Drive and Interstate Avenue.

IBR's Response to Building the MLK Undercrossing

Have Portland Fund This – Not the IBR
This undercrossing has been proposed to the IBR early in the design process. IBR has stated that a MLK undercrossing might be nice to have but that the undercrossing should be something that City of Portland funds later.

A complete MLK undercrossing and ramp design is more appropriate to be included in the IBR funding package. This undercrossing improves freight connections for this intersection described as Oregon's most important freight interchange. The MLK undercrossing excels at meeting the IBR purpose and need (c) **improve highway freight mobility**.

IBR building a minimally acceptable ramp design and suggest the local city come back later and rebuild the preferred connection is not good public policy. The cost of the undercrossing would be an exceptionally large funding request for Portland. The undercrossing is more appropriate to be funded in the budget for a project that describes itself as building a bridge to meet the needs for the next 100 years.

Please study the MLK undercrossing and full interchange design.
Involve the freight community, residents, PBOT, and PP&R. Let's work together to refine a ramp and undercrossing design that excels at meeting Section C of the Purpose and Need of the IBR to improve freight mobility.

Thank you,

Mark Astor
[redacted]

IBR Draft SEIS - RECORD #2343 DETAIL

First Name :	Mark
Last Name :	Astor
Attachments :	DSEIS-2343_Astor_Original.pdf (266 kb)

IBR Draft SEIS - RECORD #2343 DETAIL

Submission Date :	11/17/2024
First Name :	Mark
Last Name :	Astor
Business/Organization/Agency :	
Attachments :	Marine Drive Bike Lanes_.pdf (269 kb)

Submission Input :

IBR Team,

Please see my comments on the Draft SEIS (Marine Drive bike lane).

Comments on Freight and Bike Conflicts on the Marine Drive Single Point Interchange
The IBR proposed design for bike lanes through the Marine Drive single point interchange presents a major conflict between bike and freight movements. As the Marine Drive interchange is one of the most important freight interchanges in the State of Oregon, we request that these pathways for active transportation be built separated from freight movements to provide safe passage for active transportation users. This meets the purpose and needs of the IBR to (b) improve connectivity, reliability, travel times, and operations of public transportation modal alternatives in the Program area and (c) improve highway freight mobility and address interstate travel and commerce needs in the Program area. Please study how these corridors could be built separated from the vehicle travel lanes using barriers or raised
active transportation pathways.

In addition, the IBR should study how to use the new technologies of sensors
that detect active transportation user approaching intersections crossings. These advanced sensors trigger traffic signals, so that users crossing through many these intersections does not have to individually press a button at each crossing and wait for the signal to change one crossing at a time.

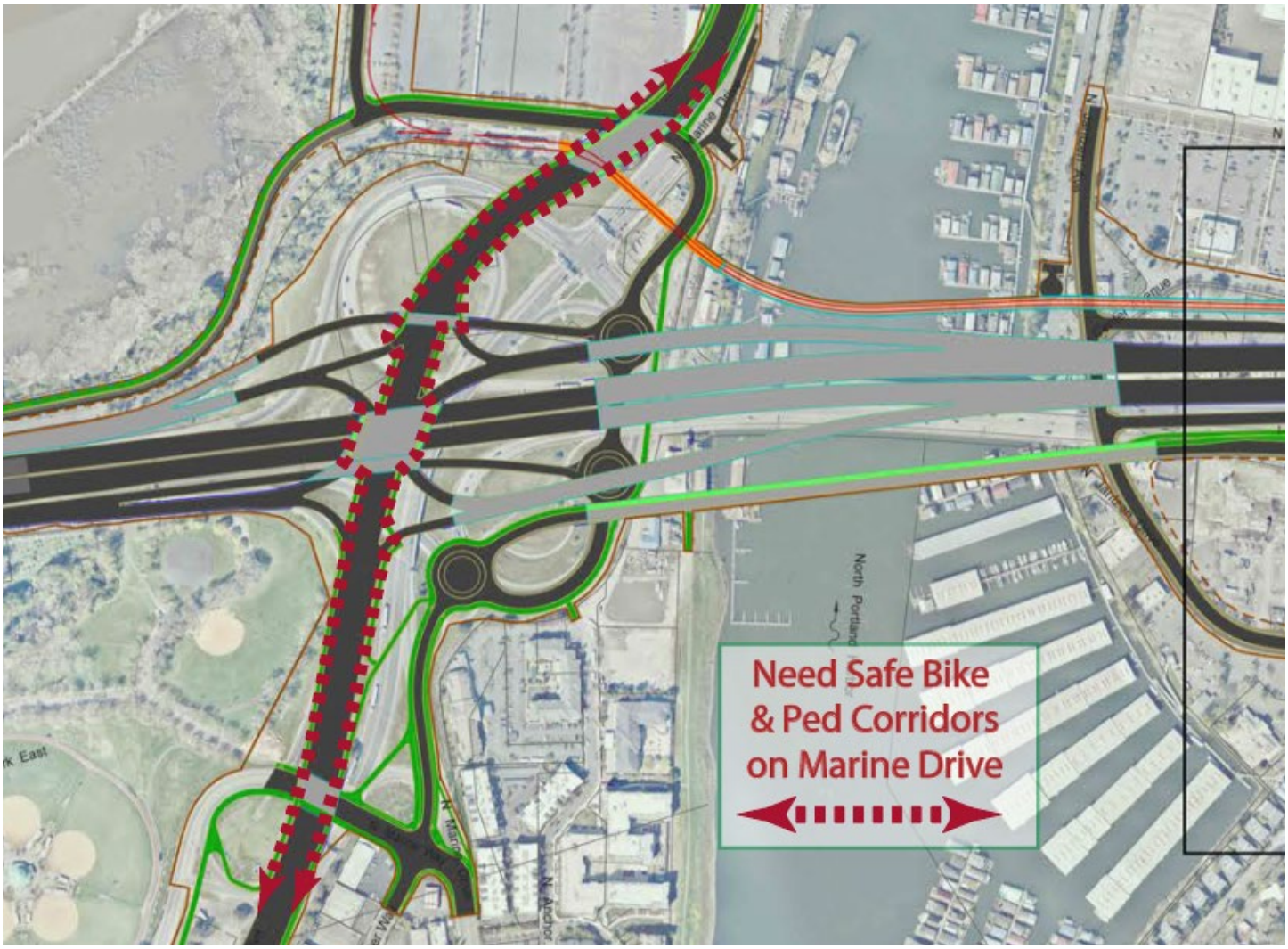
Thank you,

Mark Astor
[redacted]

Comments on Freight and Bike Conflicts on the Marine Drive Single Point Interchange

The IBR proposed design for bike lanes through the Marine Drive single point interchange presents a major conflict between bike and freight movements. As the Marine Drive interchange is one of the most important freight interchanges in the State of Oregon, we request that these pathways for active transportation be built separated from freight movements to provide safe passage for active transportation users.

This meets the purpose and needs of the IBR to (b) improve connectivity, reliability, travel times, and operations of public transportation modal alternatives in the Program area and (c) improve highway freight mobility and address interstate travel and commerce needs in the Program area.



Please study how these corridors could be built separated from the vehicle travel lanes using barriers or raised active transportation pathways. In addition, the IBR should study how to use the new technologies of sensors that detect active transportation user approaching intersections crossings. These advanced sensors triggers traffic signals, so that users crossing through many these intersections does not have to individually press a button at each crossing and wait for the signal to change one crossing at a time.

Thank you,

Mark Astor
[redacted]

IBR Draft SEIS - RECORD #2344 DETAIL

First Name :	Mark
Last Name :	Astor
Attachments :	DSEIS-2344_Astor_Original.pdf (259 kb)

IBR Draft SEIS - RECORD #2344 DETAIL

Submission Date :	11/17/2024
First Name :	Mark
Last Name :	Astor
Business/Organization/Agency :	
Attachments :	Comments on Cork Screw Ramps_.pdf (263 kb)

Submission Input :

IBR Team,

Please see my comments on the Draft SEIS (corkscrew ramps).

Comments on Separating the Multiuse Path Corkscrew Ramps & Light Rail Stations Stair / Elevators: The IBR proposes building the light rail line on the south bound main bridge. The Vancouver shoreline light rail station is approximately 100’ in elevation above the ground and is access through stairs and elevators. The multiuse path is built on the north bound main bridge span. The end point of the multiuse path on the Vancouver shoreline is approximately 100’ in elevation above the ground and is access by a corkscrew ramp of approximately ½ mile in length.

Though the Vancouver shoreline light rail station and the end point of the multiuse trail are adjacent to each other and are both 100’ in elevation above the ground, the access systems for each are entirely separate from each other. The stairs and elevators for transit users are not usable for users of the multiuse path. The ramp connection for multiuse path users that are not usable for transit riders. The Hayden Island light rail station and Oregon side of the main bridge multiuse path has the same disconnection, though the elevation is less at about 35’ above ground.
People who are not driving to their destination, a goal of the IBR, will often use several modes to reach their destination. Users may ride their bikes to a light rail station, place their bikes on the train in storage specially design for bikes on the light rail train, then ride their bikes for the final leg of their trip.

The IBR design of entirely separate light rail and multiuse path access makes these blended trips difficult. I believe additional study is needed to connect these two systems together.

Thank you

Mark Astor
[redacted]

Comments on Separating the Multiuse Path Corkscrew Ramps & Light Rail Stations Stair / Elevators

The IBR proposes building the light rail line on the south bound main bridge. The Vancouver shoreline light rail station is approximately 100' in elevation above the ground and is access through stairs and elevators.

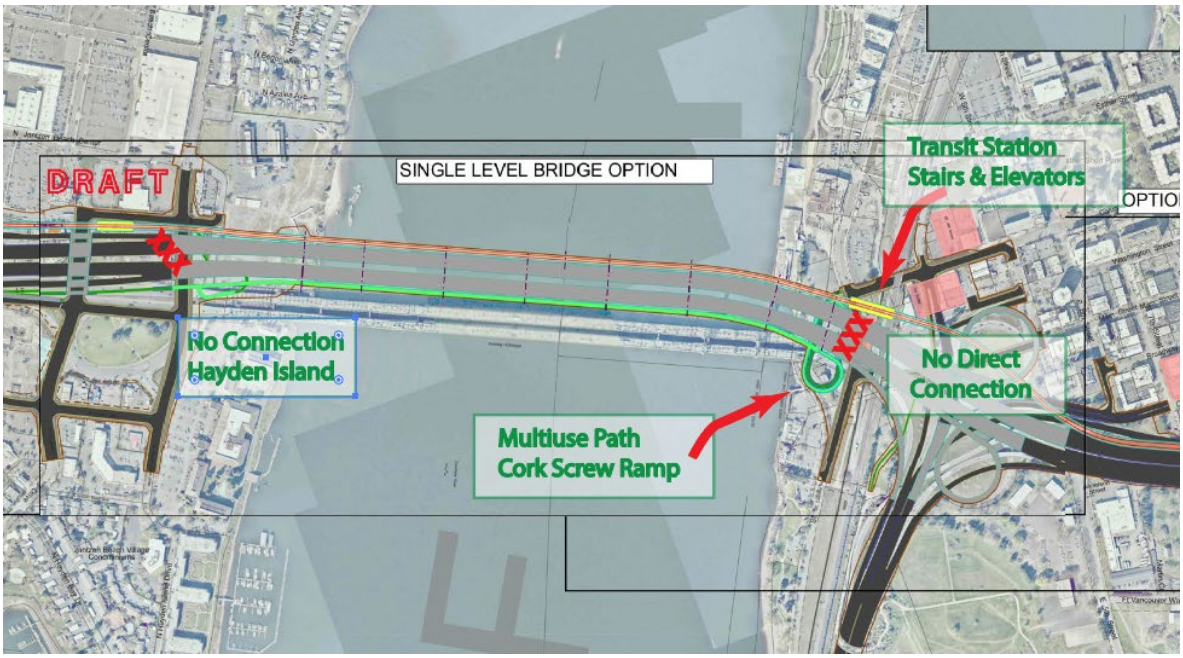
The multiuse path is built on the north bound main bridge span. The end point of the multiuse path on the Vancouver shoreline is approximately 100' in elevation above the ground and is access by a corkscrew ramp of approximately ½ mile in length.

Though the Vancouver shoreline light rail station and the end point of the multiuse trail are adjacent to each other and are both 100' in elevation above the ground, the access systems for each are entirely separate from each other. The stairs and elevators for transit users are not usable for users of the multiuse path. The ramp connection for multiuse path users that are not usable for transit riders.

The Hayden Island light rail station and Oregon side of the main bridge multiuse path has the same disconnection, though the elevation is less at about 35' above ground.

People who are not driving to their destination, a goal of the IBR, will often use several modes to reach their destination. Users may ride their bikes to a light rail station, place their bikes on the train in storage specially design for bikes on the light rail train, then ride their bikes for the final leg of their trip. The IBR design of entirely separate light rail and multiuse path access makes these blended trips difficult.

I believe additional study is needed to connect these two systems together.



Thank you

Mark Astor

[redacted]

IBR Draft SEIS - RECORD #2345 DETAIL

First Name :	Mark
Last Name :	Astor
Attachments :	DSEIS-2345_Astor_Original.pdf (171 kb)

IBR Draft SEIS - RECORD #2345 DETAIL

Submission Date :	11/17/2024
First Name :	Mark
Last Name :	Astor
Business/Organization/Agency :	
Attachments :	Comments Bridge Architecture_.pdf (174 kb)

Submission Input :

IBR Team,

Please see my comments on the Draft SEIS (bridge architecture).

Comments on the Importance of the Architectural Design of the New Bridges:
Once the project decides whether the main bridges are going to be a single level bridges, stack style bridges or lift style bridges, the IBR project will develop the aesthetic characteristics of the final bridges.

We request that once the bridge configuration is determined the IBR will hold a public process on the final architectural design of not only the main bridges but the entire bridge corridor. This process could be modeled after similar processes that Portland has done in the past for Tilikum Crossing and the new Burnside Bridge. These processes were both led by national design experts in collaboration with local design experts, the project engineers and members of the public to recommend a final bridge architecture to the region's leaders.

We believe the aesthetics of these bridges matter, and that they are an important inspiration that helps move the project forward. The architectural style of the bridges creates a gateway to both Oregon and Washington. The view of the bridges from the Vancouver shoreline and Hayden Island are important to the future developments in those areas. Should the IBR select the stack bridges as the best option, that bridge structure, even though it is a basic truss, can be executed with finesse. Remember the bridges crossing North Portland Harbor could have architectural significance as well. Imagine driving over the harbor between twin cable-stayed bridges on each side, one beautiful structure holding up the light rail bridge, and its twin holding up the local Harbor bridge. Even a flat bridge can have architectural significance. How the constraints of the project are resolved in the hands of a talented bridge architect become the bridge's unique beauty. The region is investing a lot into these bridges that will be part of our environment for a long time. Let's build something we are proud to leave to future generations.

Thank you

Mark Astor
[redacted]

Comments on the Importance of the
Architectural Design of the New Bridges

Once the project decides whether the main bridges are going to be a single level bridges, stack style bridges or lift style bridges, the IBR project will develop the aesthetic characteristics of the final bridges.

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Even a flat bridge can have architectural significance. How the constraints of the project are resolved in the hands of a talented bridge architect become the bridge's unique beauty.

The region is investing a lot into these bridges that will be part of our environment for a long time. Let's build something we are proud to leave to future generations.

Thank you

Mark Astor
[redacted]

IBR Draft SEIS - RECORD #2346 DETAIL

First Name :	Helena
Last Name :	Birecki
Attachments :	DSEIS-2346_Birecki_Original.pdf (5 kb)

IBR Draft SEIS - RECORD #2346 DETAIL

Submission Date : 11/17/2024
First Name : Helena
Last Name : Birecki
Business/Organization/Agency :

Submission Input :

First Name:
Helena

Last Name:
Birecki

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Environmental Justice

Comment:
Thank you for the opportunity to comment on the I-5 Bridge Replacement. The plan needs a rethink:

Freeway expansion is bad for the climate, bad for public health, bad for environmental justice, and Is Not Useful for mitigating traffic congestion, especially in the case of the I-5 bridge.
According to Smart Mobility President Norman Marshall's Review of the IBR Project's DSEIS -- https://justcrossing.org/wp-content/uploads/2024/10/Marshall_SDEIS_Modeling_Review_October2024.pdf -- the width of the bridge is not even the current cause of congestion! Southbound, the main congestion appears to be at N. Lombard St, and northbound, the slowest traffic is just south of N. Marine Drive. Neither is addressed by the Bridge Replacement Plan. When freeways are widened within cities, the environmental

injustice and displacement that occurs is unconscionable. The congestion problem will only be solved with strategies that promote travel in modes other than the automobile.

Any Bridge Replacement should be designed with public health, pollution reduction, and environmental justice with mode shift to active and public transportation as the guiding principles. New construction has its own embodied carbon and pollution burdens and should be carefully tailored to reduce impact and concrete tonnage. New roads and bridges should be designed to reduce the need for car and truck crossings and those related pollution and noise burdens. Any new I-5 Bridge construction should motivate and make it easy for people to cross the river on public transit and/or, on foot, bicycle, or other personal mobility devices.

The current IBR project design is oversized, overburdening, and makes it difficult for people to choose sustainable modes of transportation. In Oregon and Washington, we pride ourselves on climate and environmental justice goals.

IBR Project designers-- revise the plan so that our children and grandchildren can be proud of us.

JCA comment #: 515

IBR Draft SEIS - RECORD #2348 DETAIL

First Name :	Jamers
Last Name :	De Ste Croix
Attachments :	DSEIS-2348_DeSteCroix_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #2348 DETAIL

Submission Date : 11/17/2024
First Name : Jamers
Last Name : De Ste Croix
Business/Organization/Agency :

Submission Input :

First Name:
Jamers

Last Name:
De Ste Croix

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
I would like to see a delay in this project of at least 6 months. I've seen no definitive specifications on this project, only generalized claims as to its location and final form. Until those issues are clearly spelled out, I cannot support this project.

I reside on Hayden island right in the (specifically undefined) pathway of this proposed abstraction.

JCA comment #: 514

IBR Draft SEIS - RECORD #2350 DETAIL

First Name :	Helena
Last Name :	Birecki
Attachments :	DSEIS-2350_Birecki_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #2350 DETAIL

Submission Date : 11/17/2024
First Name : Helena
Last Name : Birecki
Business/Organization/Agency :

Submission Input :

First Name:
Helena

Last Name:
Birecki

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
The Interstate Bridge Replacement needs a more sensible connection between active transportation and public transit access. I've commuted by bike + public transit much of my life, and a half mile loop plus a hundred foot climb to the MAX proposed for the Vancouver side could be a dealbreaker even for me. Imagine, you need to get to work on time, the elevator's broken or slow that day, and you miss your train. Imagine, you're coming home from work, and it's 100 degrees outside, and you have to go down only to come back up in the heat. Oregon and Washington pride themselves on building active transportation and healthy communities and this plan goes 100% in the opposite direction. Please reconsider in line with the Just Crossing Alliance's Active Transportation and Transit vision https://justcrossing.org/wp-content/uploads/2024/11/Just-Crossing-Alliance-Active-Transportation-Vision.pdf.

JCA comment #: 513

IBR Draft SEIS - RECORD #2352 DETAIL

First Name :	Unknown
Last Name :	Grasshopper
Attachments :	DSEIS-2352_Grasshopper_Original.pdf (7 kb) grasshopper_+15037560536_11_17_2024_015794452.mp3 (223 kb)

IBR Draft SEIS - RECORD #2352 DETAIL

Submission Date :	11/17/2024
First Name :	Unknown
Last Name :	Grasshopper
Business/Organization/Agency :	
Attachments :	DSEIS_2352_Grasshopper_Original.pdf (1 kb)

Submission Input :

New Grasshopper Voicemail

Caller: [redacted]
Extension: 701 - SEIS - English Translation
Grasshopper #: (866) 427-7347
Timestamp: 11/16/2024 5:57:51 PM (UTC-08:00) Pacific Time (US & Canada)

Read Your Voicemail

"Hi, I think that the draft SEIS is very problematic. I don't think it adequately addresses problems related to water pollution and groundwater, air pollution, wildlife, the Columbia Slough and climate change and all kinds of pollutants and so I think it needs to be examined and redrafted. Thank you very much."
Play this voicemail on your mobile phone or online

Sign in to your account

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Love Grasshopper? Tell a Friend & spread the word!

IBR Draft SEIS - RECORD #2353 DETAIL

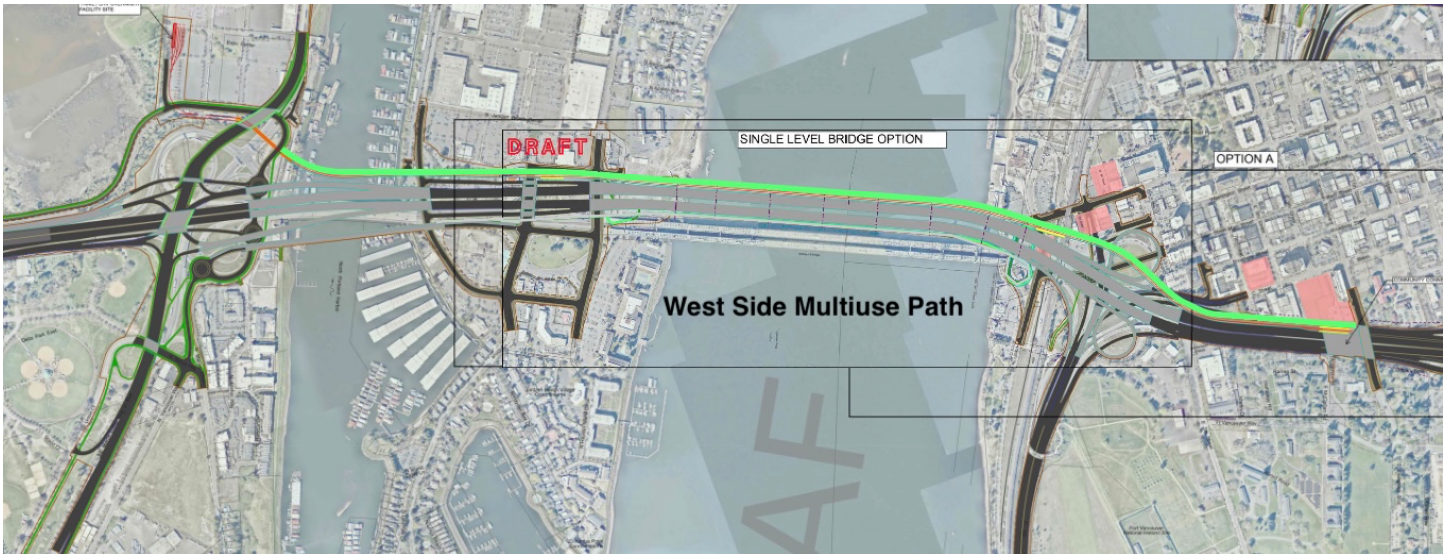
First Name :	Deb
Last Name :	Scott
Attachments :	West_Side_Mulituse_Path.pdf (2 mb)

Comments on Studying building both the multi-use path and the light rail line on the west side of the south bound main bridge

The IBR proposes building the light rail line on the south bound main bridge and the multiuse path on the north bound main bridge span. The IBR proposal makes each system separate from each other. The IBR proposal makes connections between these two systems difficult and inefficient for transit and active transportation users.

The IBR proposal has stairs and elevators providing connections for transit users but the stairs and elevators are not usable for users of the multi-use path. The multi-use path has ramp connections for users that are not usable for transit riders. Though these two systems are parallel to each other, but they are entirely separated systems. These systems do not connect easily even though active transportation users want to connect to transit.

We believe additional study is needed to connect these two systems together. People who are not driving to their destination, a goal of the IBR, will often use several modes to reach their destination. Users may ride their bikes to a light rail station, place their bikes on the train in storage specially design for bikes on the light rail train, then ride their bikes for the final leg of their trip. The IBR design of entirely separate light rail and multiuse path makes these blended trips difficult.



One idea that needs to be studied more is to build the multiuse path next to the light rail alignment on the south bound main bridge. Compared to the multiuse path on the east side of the main bridge, the multiuse path on the west side next to the light rail alignment better meets the purpose and needs statement for the IBR to (b) improve connectivity, reliability, travel times, and operations of public transportation modal alternatives in the Program area. The west side alignment provides the following improvements:

• Seamless Transition: Users should easily switch between transit and active transportation at any station, with no grade changes or distance barriers.

• Shared Elevator Access: Allowing active transportation users to share transit station elevators eliminates the need for additional infrastructure, making the design more efficient and accessible.

• Creates reductant ways to connect to both transit and multiuse path: If the elevator is not working, users can use the ramp or stairs. User not able to negotiate going up the long ramps can use the elevator. Bike users who get a flat tire on the multiuse path can connect to the light rail station and still get to their destination.

• Provides Eyes on the Path: Transit operators and passengers provide a continuous presence, reducing the isolation felt on a multi-use path and enhancing safety and comfort.

• Better Emergency Egress: The multi-use path should double as an emergency exit route for the transit way, supporting user safety during unexpected events.

• Inclusive Design Principles: These principles ensure the accessibility and usability of both transit and active transportation facilities for individuals of all abilities.

• By building the multiuse path on the west side of the light rail trackway provides greater separation from vehicle noise and would offer a more pleasant experience for active transportation users compared to a multiuse path on the east side immediately next to vehicle travel.

• If the multiuse path was built next to the light rail line on the light rail bridge crossing North Portland Harbor, then the multiuse path connection to the 40 Mile loops would be direct rather than out of direction when the multiuse path is on the local Harbor Bridge.

Regarding Views: There is a good view of Mt Hood if the multiuse path in on the east side of the north bound main bridge, however there is a good view to the west too. Additionally, a quality view of North Portland Harbor and Mt Hood views could be experienced on the local harbor bridge, but the IBR proposes the multiuse path on the west side of that local Harbor Bridge. The IBR also shows a side walk on the east side of the local Harbor Bridge. We propose that the side walk on the east side of the Local Harbor Bridge be as wide as possible and include wide spots for stopping on the route to rest and appreciate one of the region's best view of North Portland Harbor.

View East from Local Harbor Bridge

Thank you
40 Mile Loop Land Trust
Approved by 40 Mile Loop Board on 11/11/2024

IBR Draft SEIS - RECORD #2354 DETAIL

First Name :	Tom
Last Name :	Howe
Attachments :	DSEIS-2354_Howe_Original.pdf (6 kb)

IBR Draft SEIS - RECORD #2354 DETAIL

Submission Date : 11/17/2024
First Name : Tom
Last Name : Howe
Business/Organization/Agency :

Submission Input :

First Name:
Tom

Last Name:
Howe

Email:
[redacted]

Topic Area:
Parks and Recreation

Comment:
Need a calm way for pedestrians and cyclists to get across the river for the parks on the other side.

JCA comment #: 512

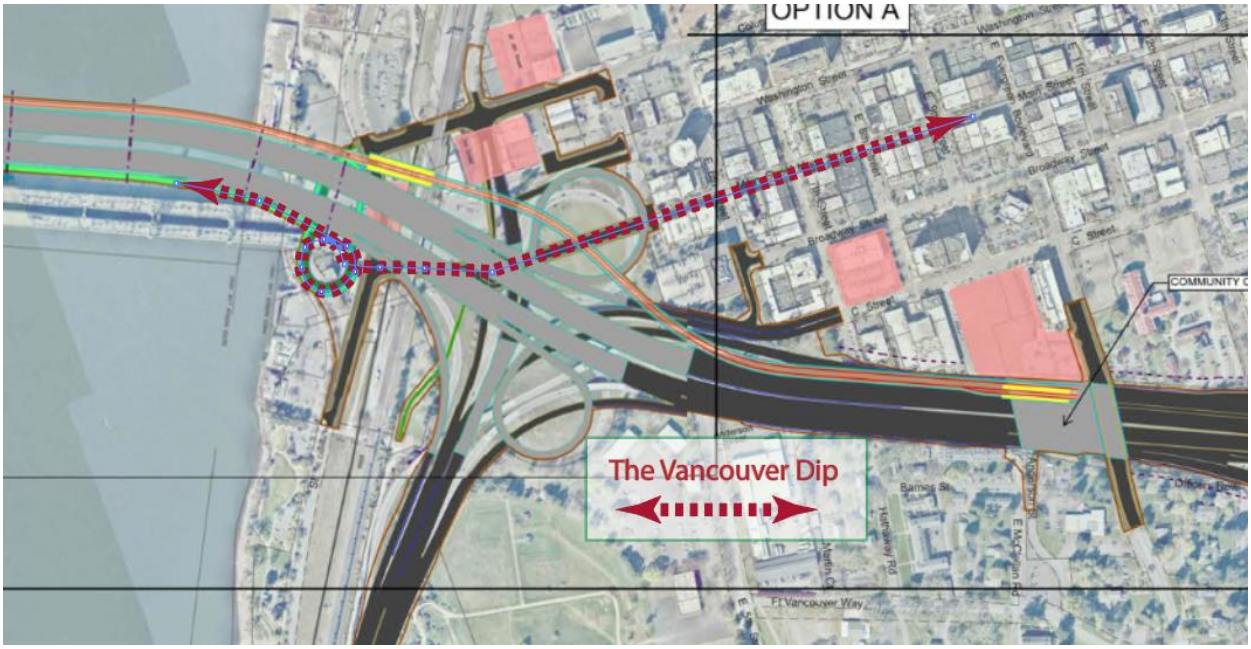
IBR Draft SEIS - RECORD #2356 DETAIL

First Name :	Deb
Last Name :	Scott
Attachments :	The_Vancouver_Dip.pdf (205 kb)

Comments on the out of direction way active transportation users connect to the Multi-Use Path on the Vancouver shoreline.
The Vancouver Dip.

If you are traveling by active transportation from central Vancouver, you must first travel down grade to the Vancouver shoreline, then travel up the long spiral ramp to connect to the main bridge multi use path. We call this the Vancouver Dip.

This is a significant barrier that will discourage use of active transportation due to the extra effort needed to travel down grade from central Vancouver to the shoreline, then up a long ramp to go south on the multiuse path. Northbound travel by active transportation user would experience the same Vancouver Dip in reverse.



The Vancouver Dip does not meet the IBR purpose and need to; (b) improve connectivity, reliability, travel times, and operations of public transportation modal alternatives in the Program area.

To better meet the purpose and need, additional study is needed to see if the multiuse path could be extended to the next light rail station which is proposed to be a transit hub for Vancouver. This transit hub brings together the new light rail line extension and several BRT lines together. Adding a direct connection to the multiuse path at this transit hub would encourage active users and facilitate active transportation users using both transit and biking efficiently for their complete non-auto trip. This would eliminate the Vancouver Dip.

One idea that needs additional study that would alleviate the disconnection between transit and active transportation users is to place the multi-use path and the transit line next to each other on the west side of the southbound main bridge. This idea of the west side multiuse path will be discussed more in a separate comment.

Thank you
40 Mile Loop Land Trust
Approved by 40 Mile Loop Board on 11/12/24

IBR Draft SEIS - RECORD #2357 DETAIL

First Name :	Deb
Last Name :	Scott
Attachments :	The_40_Mile_Loop_Connections.pdf (361 kb)

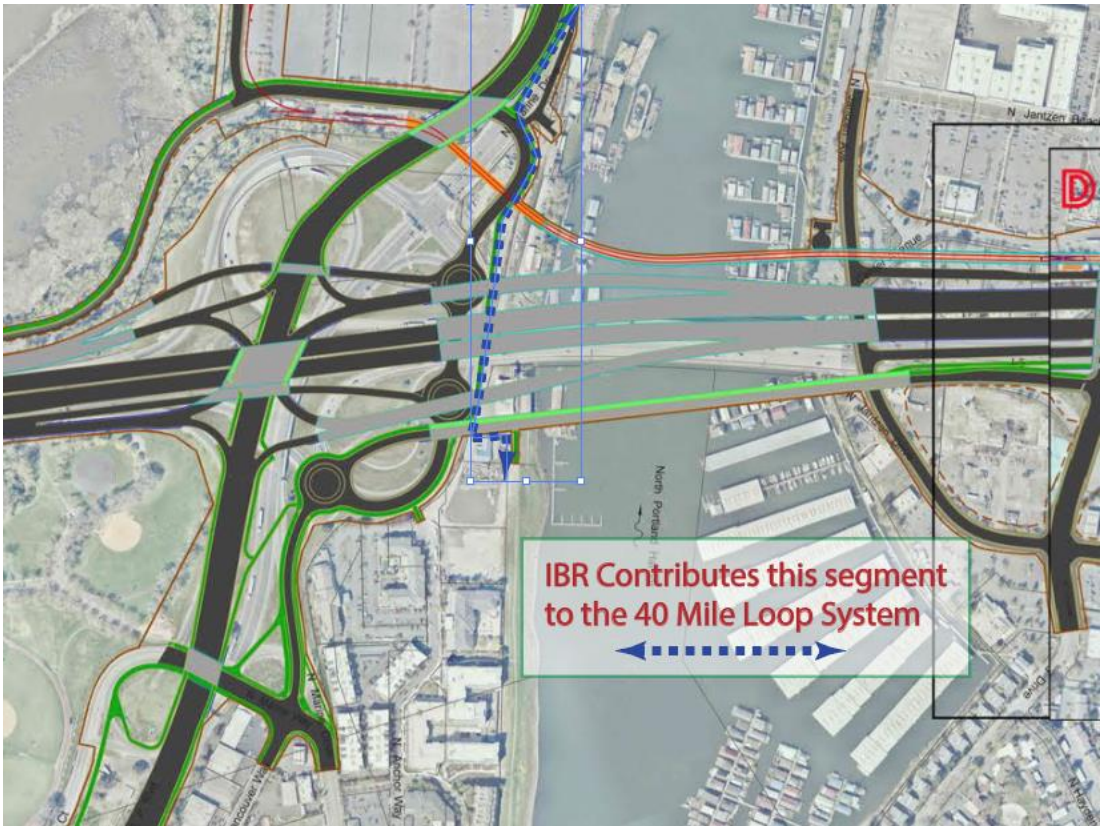
Comments on IBR Multi-Use path connections to the 40-Mile Loop East/West Corridor

The 40-Mile Loop is a comprehensive regional trail system forming a central Hub that connects nearly all other regional trails and parks within Multnomah County. The Loop alignment, which has been planned and incorporated into regional land use frameworks for over 40 years. While the trail alignment for the 40-Mile Loop has long been established, certain easements remain unacquired, and some portions of the trail are yet to be constructed.

The adopted alignment of the 40-Mile Loop passes through the area impacted by the Interstate Bridge Replacement (IBR) project. While the IBR project provides several benefits to the 40-Mile Loop, we believe additional study is warranted to make the proposed trails safer and more usable.

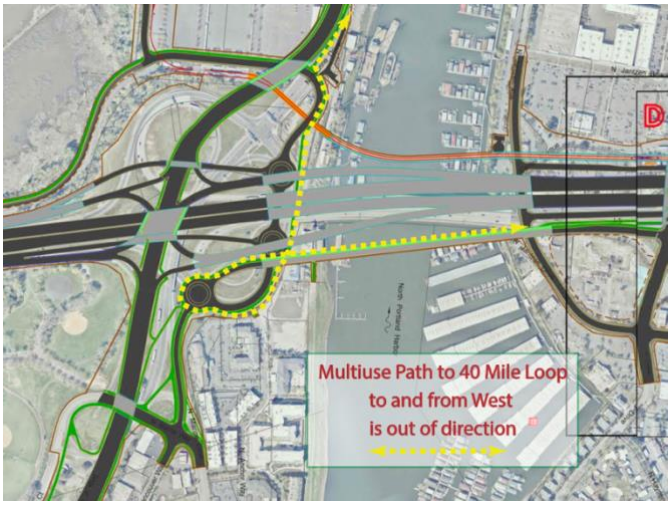
IBR Positive Contributions to the 40-Mile Loop Trail

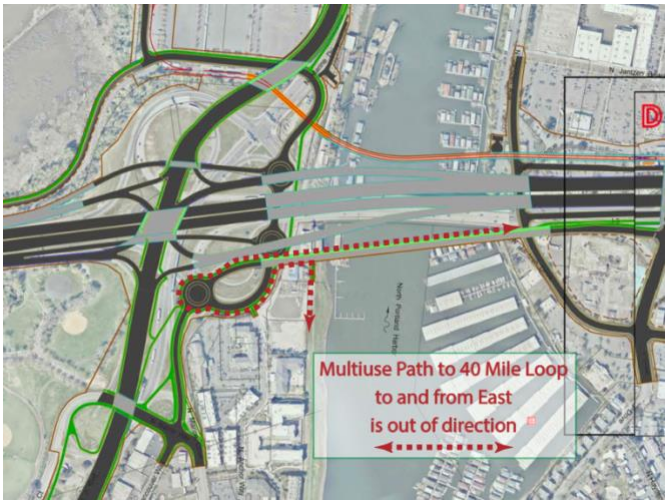
The IBR project will construct the segment of the 40-Mile Loop within the project area. This new trail segment will provide a safe, separated trail connecting the existing 40-Mile Loop trail located west of the proposed bridges through the project area, under the many new IBR bridges emanating from mainland Portland. After crossing under the local Harbor Bridge, the east most bridge proposed, the IBR will stub out the Trail to the East for a future connection to the Bridgeton Trails segment of the 40 Mile Loop. This is a good trail addition to the 40 Mile Loop and appreciated by the 40 Mile Loop Land Trust board.



Concerns with the Proposed Connection of 40 Mile Loop to the multiuse path on the local Harbor Bridge.

However, the proposed trail connections from the multiuse path on the local Harbor Bridge to the new 40-Mile Loop segment is not optimal. The proposed design requires users to travel out of their way, navigating a traffic circle and crossing vehicle lanes to reach both the eastbound and the westbound trail connection. This routing is neither convenient nor efficient and could discourage its use.





Request for Further Study of better East and West Connections to the 40 Mile Loop

We strongly recommend that alternative design options be considered to provide a more direct, connection to and from the east and west to the local Harbor Bridge multiuse path.

Possible additional study include:

1) Creating a direct connection from the East stub of the Bridgeton Trail to the sidewalk on the east side of the local Harbor Bridge. This direct connection would make it easier and more appealing for cyclists and pedestrians to cross the Harbor Bridge, while also offering a scenic route with views of North Portland Harbor and Mt Hood.
2) Additionally, we request that the sidewalk on the east side of the local Harbor Bridge be designed to be as wide as possible, with areas to rest and enjoy the views, further enhancing the experience for users.
3) Study more direct trail connections from the local Harbor Bridge multi use path to both the east and the west that do not involve routes around the Marine Drive traffic circles and crossing travel lanes.
4) Study routing the IBR entire multiuse path on the west side of the bridges rather than the east side. If the multiuse path was located on the light rail bridge on the west side, the east and west connection would be straight forward and direct. The west side multi use path is discussed more in a separate comment.
5) Lastly, we have a separate comment on ways the IBR could facilitate more just a stub for the east side connection to the Bridgeton Trail segment of the 40 Mile Loop.

Thank you
40 Mile Loop Land Trust
Approved by 40 Mile Loop Board on 11/12/24

IBR Draft SEIS - RECORD #2358 DETAIL

First Name :	Deb
Last Name :	Scott
Attachments :	Synergies_Empowered_by_the_IBR.pdf (224 kb)

Synergies Empowered by the IBR

Coordinate synergies between improvements by the IBR and other large public and private projects being constructed at the same time. This synergy coordinated by the Cities of Portland and Vancouver could create public amenities greater than any of the individual projects could provide on their own.

Example: **Create Bridgeton Trail Segment of the 40 Mile Loop**

1) IBR Road system requires acquisition of property in order to build the new Harbor Bridges. That property under the new bridges finally puts into public ownership a key missing trail segment of the 40 Mile Loop.
2) At the same time as the IBR, the Army Corp of Engineers is upgrading the adjacent levee. The improved levee will be higher in elevation and finished with a compacted gravel maintenance road.
3) That key trail segment is also located in an existing Portland urban renewal district. The urban renewal district has already designed the finished trail, amenities and connections to local walkways. The urban renewal district had set aside funds to do the finish work once the trail easements were acquired.
4) By completing this Trail segment, Hundreds of residential units in Bridgeton have a direct, protected and safe way to walk and roll to the Expo Light Rail Station. This enhances ridership numbers for the IBR Light Rail and FTA funding requests.

The City of Portland can coordinate these projects together. Work IBR is already planning to do can create a synergy that builds a key piece of Trail infrastructure greater than any one project could do on their own.

This is just one example of possible synergies empowered through the IBR.
There are other synergies for Hayden Island, Vancouver Waterfront and Historic Reserve.

Thank You
40 Mile Loop Land Trust
Approved by 40 Mile Loop Board on 11/11/2024

IBR Draft SEIS - RECORD #2359 DETAIL

First Name :	Tom
Last Name :	Howe
Attachments :	DSEIS-2359_Howe_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #2359 DETAIL

Submission Date : 11/17/2024
First Name : Tom
Last Name : Howe
Business/Organization/Agency :

Submission Input :

First Name:
Tom

Last Name:
Howe

Email:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Induced Demand

Comment:
Adding More lanes will just increase SOVs and traffic will be right up where it was before.

JCA comment #: 511

IBR Draft SEIS - RECORD #2361 DETAIL

First Name :	Deb
Last Name :	Scott
Attachments :	Separating_Freight__Bike_Travel.pdf (413 kb)

Separating Freight and Bike Travel
on the Marine Drive Interchange and On-Ramps

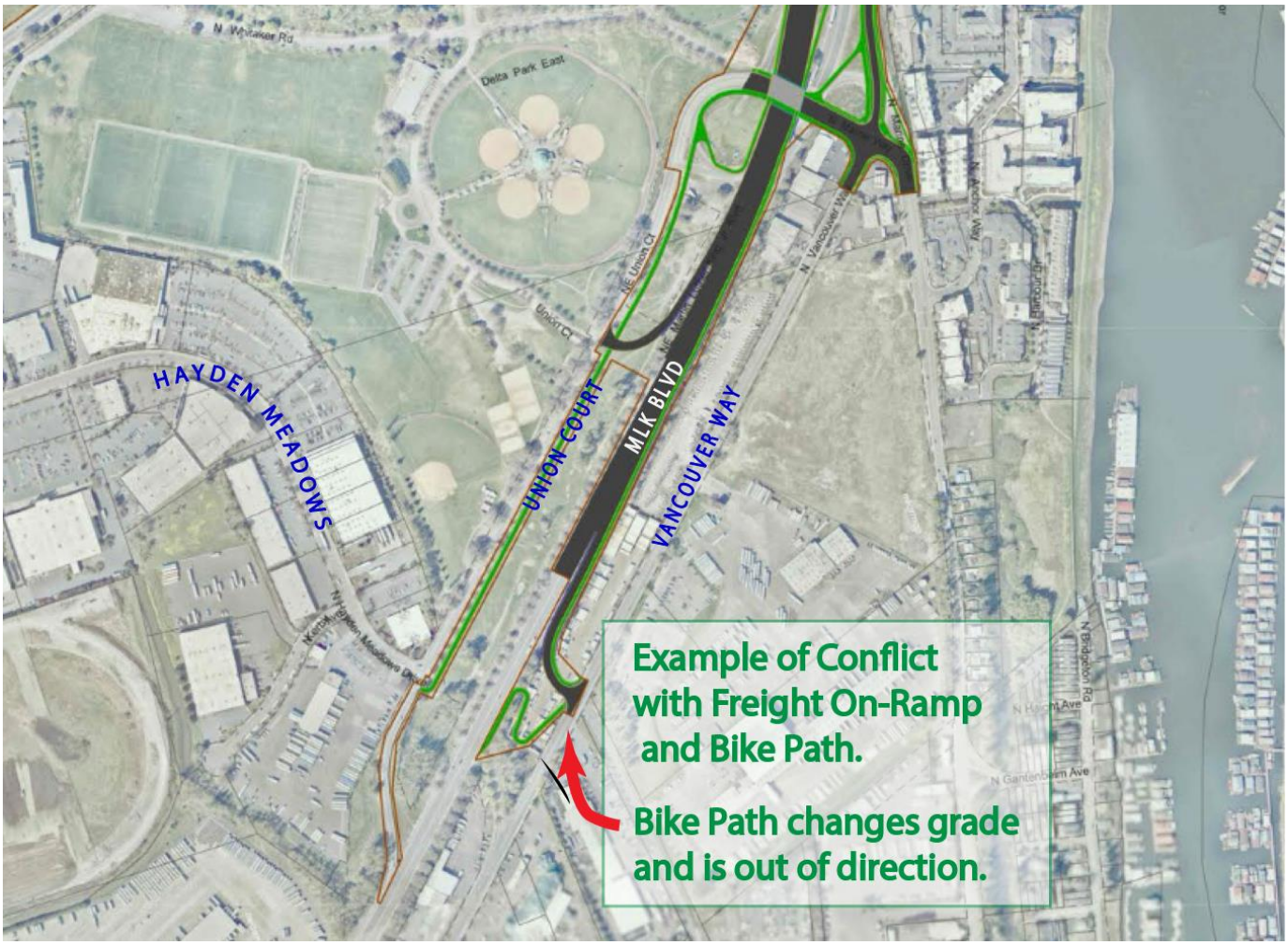
One important purpose and need of the IBR is to (c) improve highway freight mobility and address interstate travel and commerce needs in the Program area.

Another important purpose and need is to (b) improve connectivity, reliability, travel times, and operations of public transportation modal alternatives in the Program area.

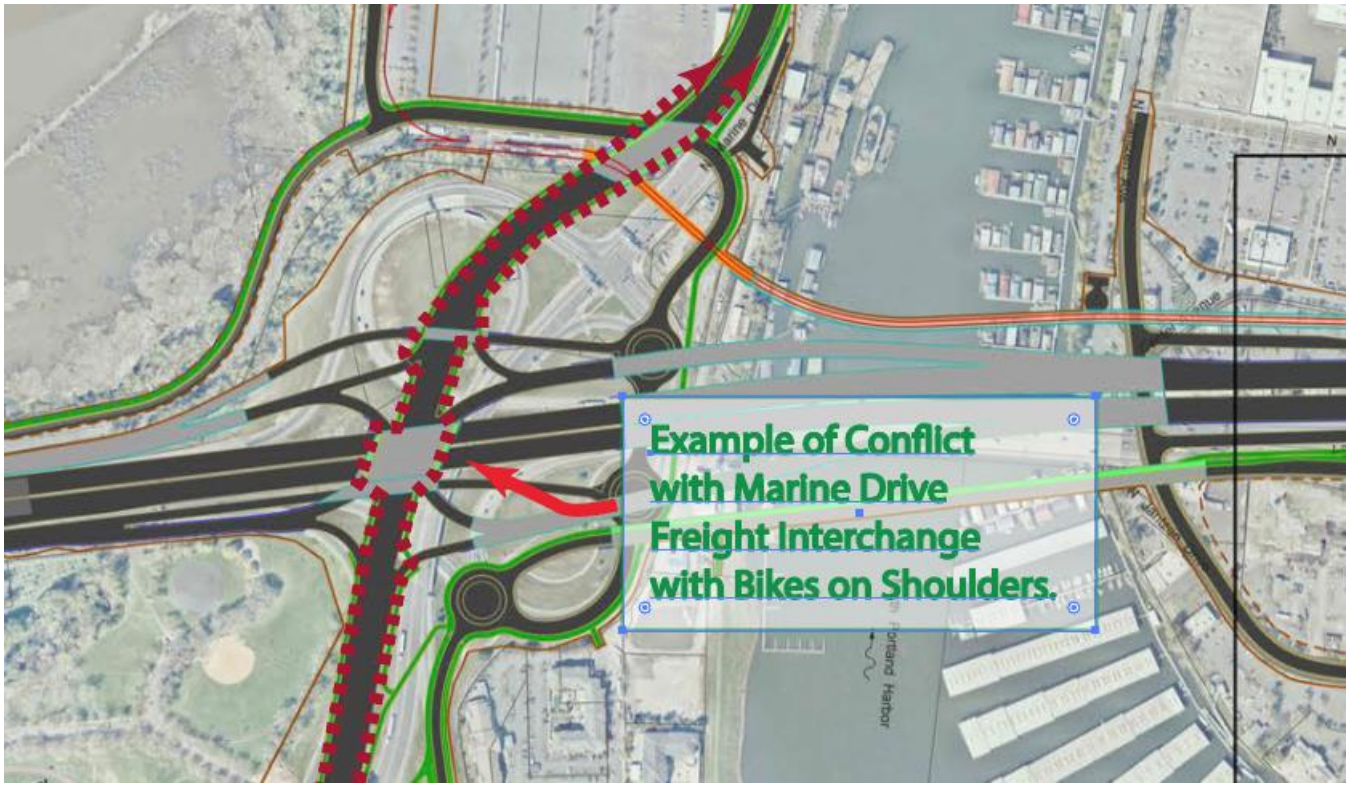
A way to meet the purpose and needs of both Freight Users and Active Transportation Users is to build active transportation routes physically separated from Freight routes as much as possible. Maximizing this separation is key to creating efficient Freight routes while creating safer, more attractive, and therefore more heavily used walking, rolling, and biking routes.

Examples of Conflicts between Freight and Active Transportation users.

The proposed IBR design for the ramp from Vancouver Way to MLK North poses significant conflict between Freight and Bikes, as the proposed Bike route travels changes grade along a switch back, crosses a major Freight intersection and climbs a grade up along a freight-heavy on-ramp.



Another example of possible Freight-Bike conflict is in the Marine Drive Interchange. Here IBR proposes to build a complete bike lanes and pedestrian sidewalk on both sides of the Interchange.



Even if the IBR is required by State Law to provide bike and pedestrian facilities on the Marine Drive interchange, we recommend additional study on improving two aspects of these improvements:

1) Any facilities for bike and ped that must be built on Marine Drive needs to be built in a way that separates bike and ped travel from Freight as much as possible using techniques such as barriers, and raised bike roadways.

2) To discourage any active transportation users from crossing the Marine Drive interchange, also build alternative routes that go around the Marine Drive Interchange rather than through the interchange. This separate bike ped system needs be so well design that it becomes the preferred route. Current IBR design has the MLK active user connection provided partially along MLK shoulders and partially on separated trails. To become the preferred route, an active transportation route that is not reliant of MLK shoulders need to be developed. This separated preferred corridor needs to conveniently link to each of the existing regional bike corridors.

Complete separation creates safety for both the people that are walking, biking and rolling in this area, but also makes it safer and more efficient for Freight Users who don't have to worry about negotiating on ramps with curves and with grade changes while watching out for bike users traveling the exact same routes.

This separation better meets 3 parts of the purpose and needs statement of the IBR; (a) improve travel safety and traffic operations on the I-5 river crossing and associated interchanges; (b) improve connectivity, reliability,

travel times, and operations of public transportation modal alternatives in the Program area; (c) improve highway freight mobility and address interstate travel and commerce needs in the Program area.

Given the Marine Drive interchange is usually described as the **most heavily used Freight corridor in Oregon**, we encourage the IBR to work with the Active Transportation Users in combination with the Freight Users **together rather than separately** to refine designs that efficiently moves Freight Users through the Marine Drive Interchange and Active Transportation Users around the Interchange.

Thank you
40 Mile Loop Land Trust
Approved by 40 Mile Loop Board on 11/12/24

IBR Draft SEIS - RECORD #2362 DETAIL

First Name :	Barbara
Last Name :	Miller
Attachments :	DSEIS-2362_Miller_Original.pdf (674 kb) West_Side_Mulituse_Path (1).pdf (671 kb)

IBR Draft SEIS - RECORD #2362 DETAIL

Submission Date :	11/17/2024
First Name :	Barbara
Last Name :	Miller
Business/Organization/Agency :	
Attachments :	West_Side_Mulituse_Path (1).pdf (671 kb)

Submission Input :

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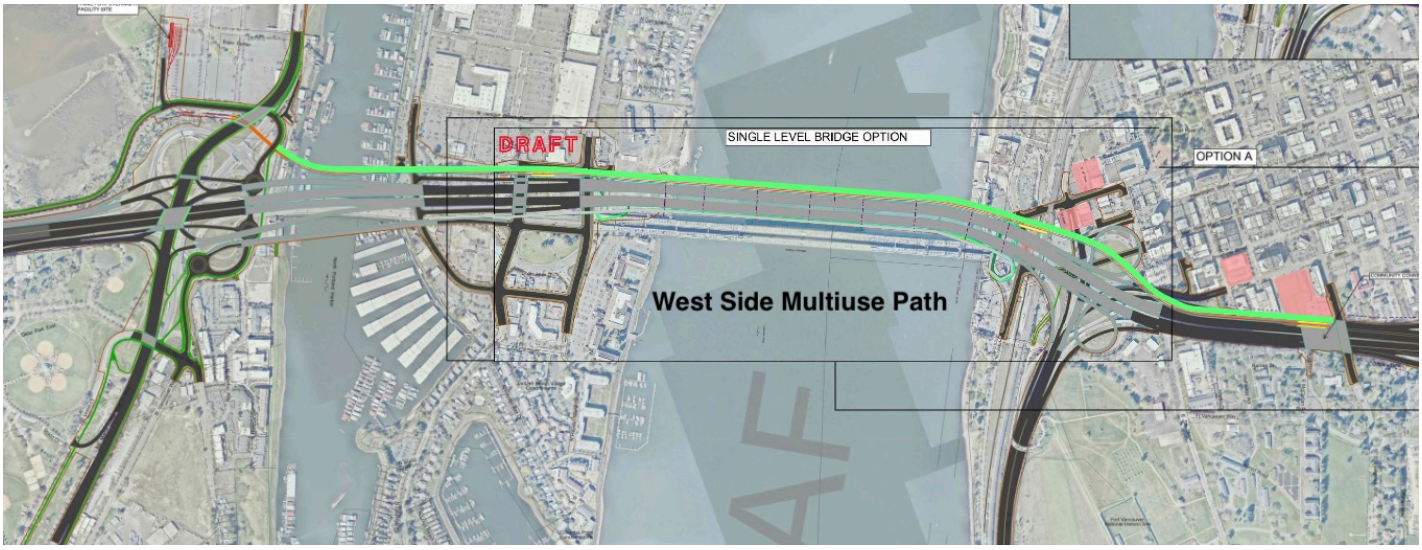
Draft SEIS Public Comment

Comments on Studying building both the multi-use path and the light rail line on the west side of the south bound main bridge

The IBR proposes building the light rail line on the south bound main bridge and the multiuse path on the north bound main bridge span. The IBR proposal makes each system separate from each other. The IBR proposal makes connections between these two systems difficult and inefficient for transit and active transportation users.

The IBR proposal has stairs and elevators providing connections for transit users but the stairs and elevators are not usable for users of the multi-use path. The multi-use path has ramp connections for users that are not usable for transit riders. Though these two systems are parallel to each other, but they are entirely separated systems. These systems do not connect easily even though active transportation users want to connect to transit.

We believe additional study is needed to connect these two systems together. People who are not driving to their destination, a goal of the IBR, will often use several modes to reach their destination. Users may ride their bikes to a light rail station, place their bikes on the train in storage specially design for bikes on the light rail train, then ride their bikes for the final leg of their trip. The IBR design of entirely separate light rail and multiuse path makes these blended trips difficult.



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- Seamless Transition: Users should easily switch between transit and active transportation at any station, with no grade changes or distance barriers.
- Shared Elevator Access: Allowing active transportation users to share transit station elevators eliminates the need for additional infrastructure, making the design more efficient and accessible.

• Creates reductant ways to connect to both transit and multiuse path: If the elevator is not working, users can use the ramp or stairs. User not able to negotiate going up the long ramps can use the elevator. Bike users who get a flat tire on the multiuse path can connect to the light rail station and still get to their destination.

• Provides Eyes on the Path: Transit operators and passengers provide a continuous presence, reducing the isolation felt on a multi-use path and enhancing safety and comfort.

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• Inclusive Design Principles: These principles ensure the accessibility and usability of both transit and active transportation facilities for individuals of all abilities.

• By building the multiuse path on the west side of the light rail trackway provides greater separation from vehicle noise and would offer a more pleasant experience for active transportation users compared to a multiuse path on the east side immediately next to vehicle travel.

• If the multiuse path was built next to the light rail line on the light rail bridge crossing North Portland Harbor, then the multiuse path connection to the 40 Mile loops would be direct rather than out of direction when the multiuse path is on the local Harbor Bridge.

Regarding Views: There is a good view of Mt Hood if the multiuse path in on the east side of the north bound main bridge, however there is a good view to the west too. Additionally, a quality view of North Portland Harbor and Mt Hood views could be experienced on the local harbor bridge, but the IBR proposes the multiuse path on the west side of that local Harbor Bridge. The IBR also shows a side walk on the east side of the local Harbor Bridge. We propose that the side walk on the east side of the Local Harbor Bridge be as wide as possible and include wide spots for stopping on the route to rest and appreciate one of the region's best view of North Portland Harbor.

View East from Local Harbor Bridge

Thank you!

Barbara J. Miller
[redacted]

Draft SEIS Public Comment

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The IBR proposes building the light rail line on the south bound main bridge and the multiuse path on the north bound main bridge span. The IBR proposal makes each system separate from each other. The IBR proposal makes connections between these two systems difficult and inefficient for transit and active transportation users.

The IBR proposal has stairs and elevators providing connections for transit users but the stairs and elevators are not usable for users of the multi-use path. The multi-use path has ramp connections for users that are not usable for transit riders. Though these two systems are parallel to each other, but they are entirely separated systems. These systems do not connect easily even though active transportation users want to connect to transit.

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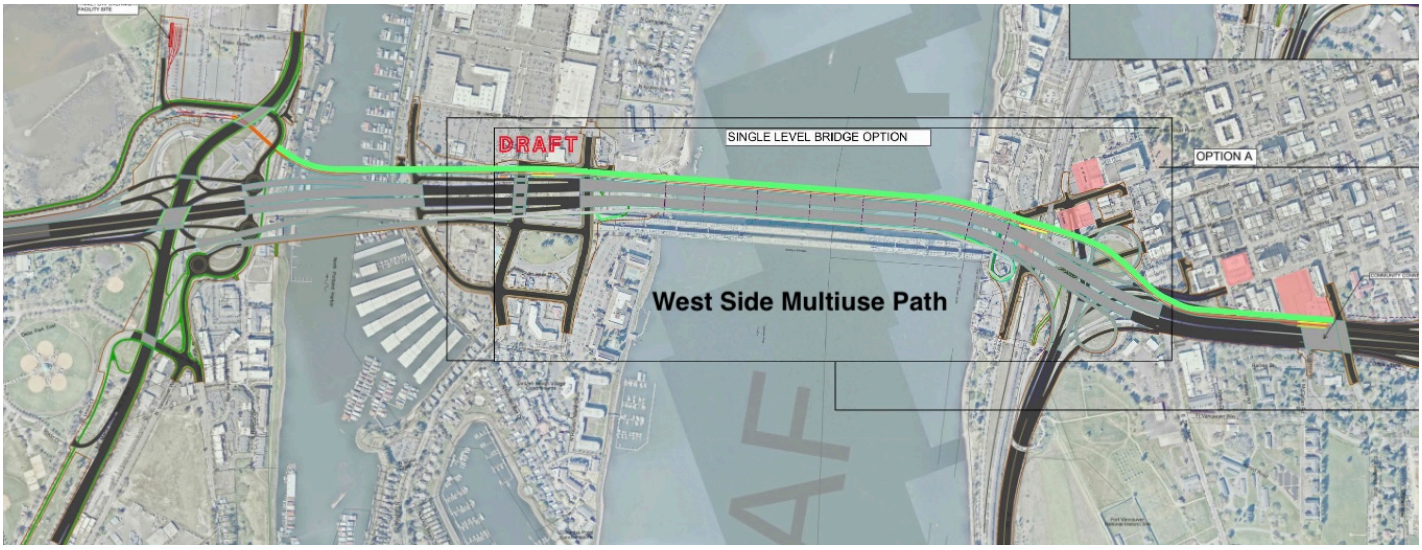

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View East from
Local Harbor Bridge

Thank you!

Barbara J. Miller
531 N Bridgeton Road, Slip 39
Portland, Oregon 97217

IBR Draft SEIS - RECORD #2363 DETAIL

First Name :	Barbara
Last Name :	Miller
Attachments :	DSEIS-2363_Miller_Original.pdf (3 mb) The_40_Mile_Loop_Connections.pdf (3 mb)

IBR Draft SEIS - RECORD #2363 DETAIL

Submission Date :	11/17/2024
First Name :	Barbara
Last Name :	Miller
Business/Organization/Agency :	
Attachments :	The_40_Mile_Loop_Connections.pdf (3 mb)

Submission Input :

cannot read message

Draft SEIS Public Comment

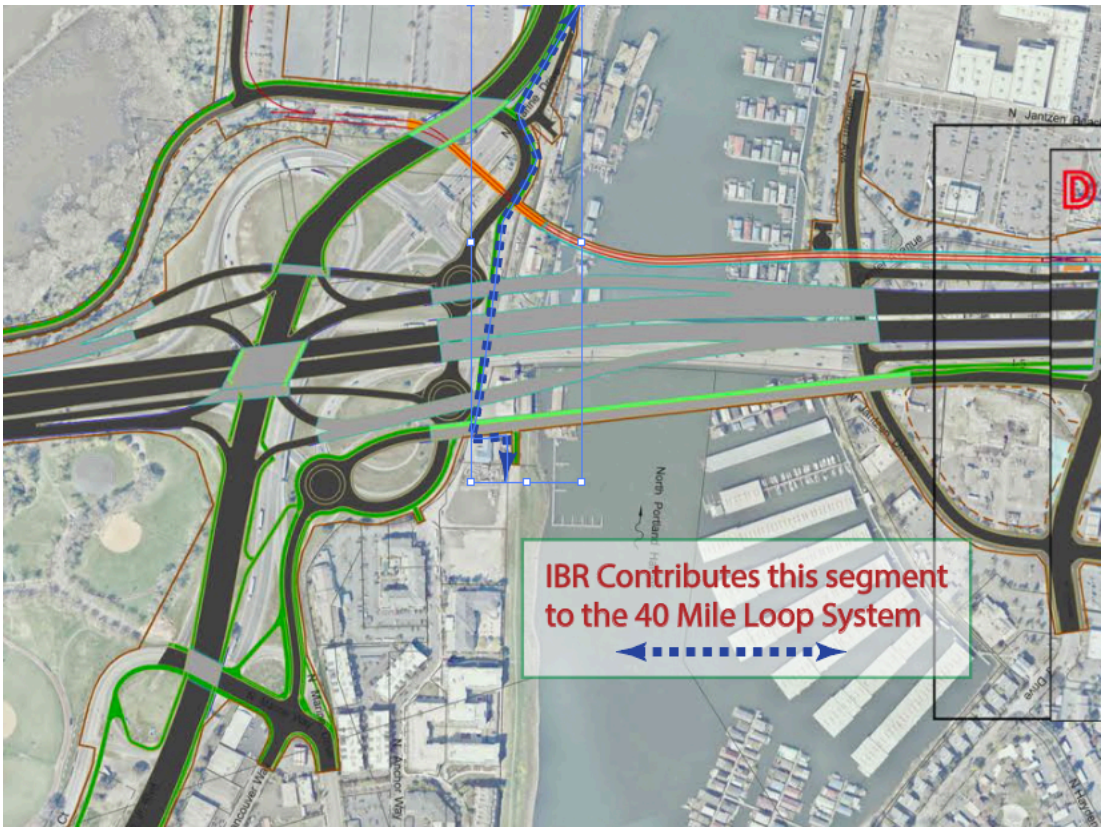
Comments on IBR Multi-Use path connections to the 40-Mile Loop East/West Corridor

The 40-Mile Loop is a comprehensive regional trail system forming a central Hub that connects nearly all other regional trails and parks within Multnomah County. The Loop alignment, which has been planned and incorporated into regional land use frameworks for over 40 years. While the trail alignment for the 40-Mile Loop has long been established, certain easements remain unacquired, and some portions of the trail are yet to be constructed.

The adopted alignment of the 40-Mile Loop passes through the area impacted by the Interstate Bridge Replacement (IBR) project. While the IBR project provides several benefits to the 40-Mile Loop, we believe additional study is warranted to make the proposed trails safer and more usable.

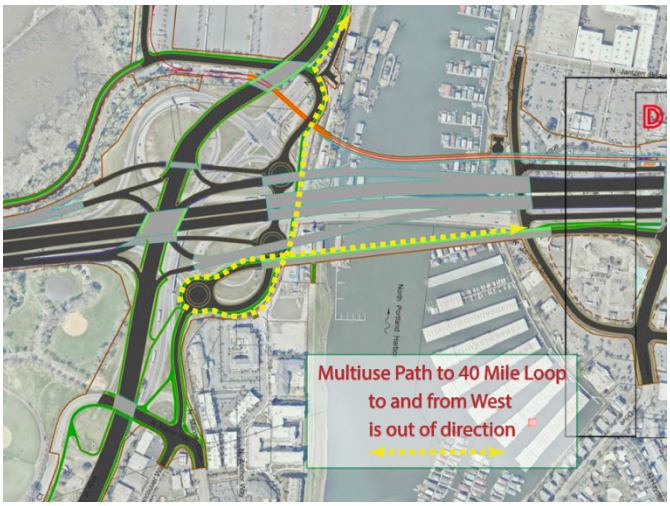
IBR Positive Contributions to the 40-Mile Loop Trail

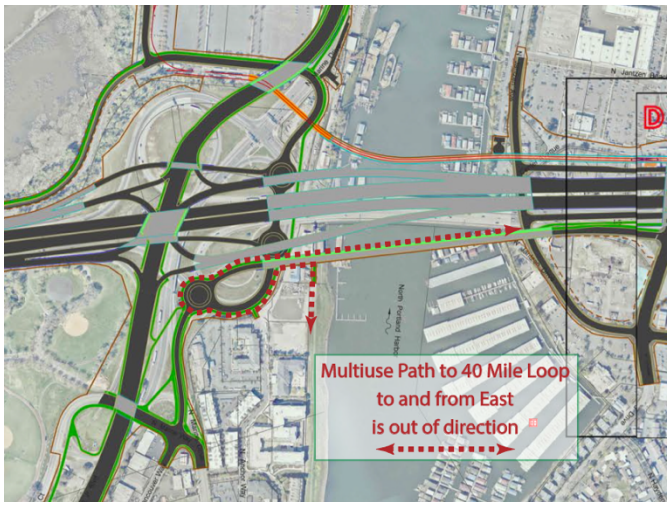
The IBR project will construct the segment of the 40-Mile Loop within the project area. This new trail segment will provide a safe, separated trail connecting the existing 40-Mile Loop trail located west of the proposed bridges through the project area, under the many new IBR bridges emanating from mainland Portland. After crossing under the local Harbor Bridge, the east most bridge proposed, the IBR will stub out the Trail to the East for a future connection to the Bridgeton Trails segment of the 40 Mile Loop. This is a good trail addition to the 40 Mile Loop and appreciated by the 40 Mile Loop Land Trust board.



Concerns with the Proposed Connection of 40 Mile Loop to the multiuse path on the local Harbor Bridge.

However, the proposed trail connections from the multiuse path on the local Harbor Bridge to the new 40-Mile Loop segment is not optimal. The proposed design requires users to travel out of their way, navigating a traffic circle and crossing vehicle lanes to reach both the eastbound and the westbound trail connection. This routing is neither convenient nor efficient and could discourage its use.





Request for Further Study of better East and West Connections to the 40 Mile Loop

We strongly recommend that alternative design options be considered to provide a more direct, connection to and from the east and west to the local Harbor Bridge multiuse path.

Possible additional study include:

1) Creating a direct connection from the East stub of the Bridgeton Trail to the sidewalk on the east side of the local Harbor Bridge. This direct connection would make it easier and more appealing for cyclists and pedestrians to cross the Harbor Bridge, while also offering a scenic route with views of North Portland Harbor and Mt Hood.
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3) Study more direct trail connections from the local Harbor Bridge multi use path to both the east and the west that do not involve routes around the Marine Drive traffic circles and crossing travel lanes.
4) Study routing the IBR entire multiuse path on the west side of the bridges rather than the east side. If the multiuse path was located on the light rail bridge on the west side, the east and west connection would be straight forward and direct. The west side multi use path is discussed more in a separate comment.
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Thank you!

Barbara J. Miller
[redacted]

Draft SEIS Public Comment

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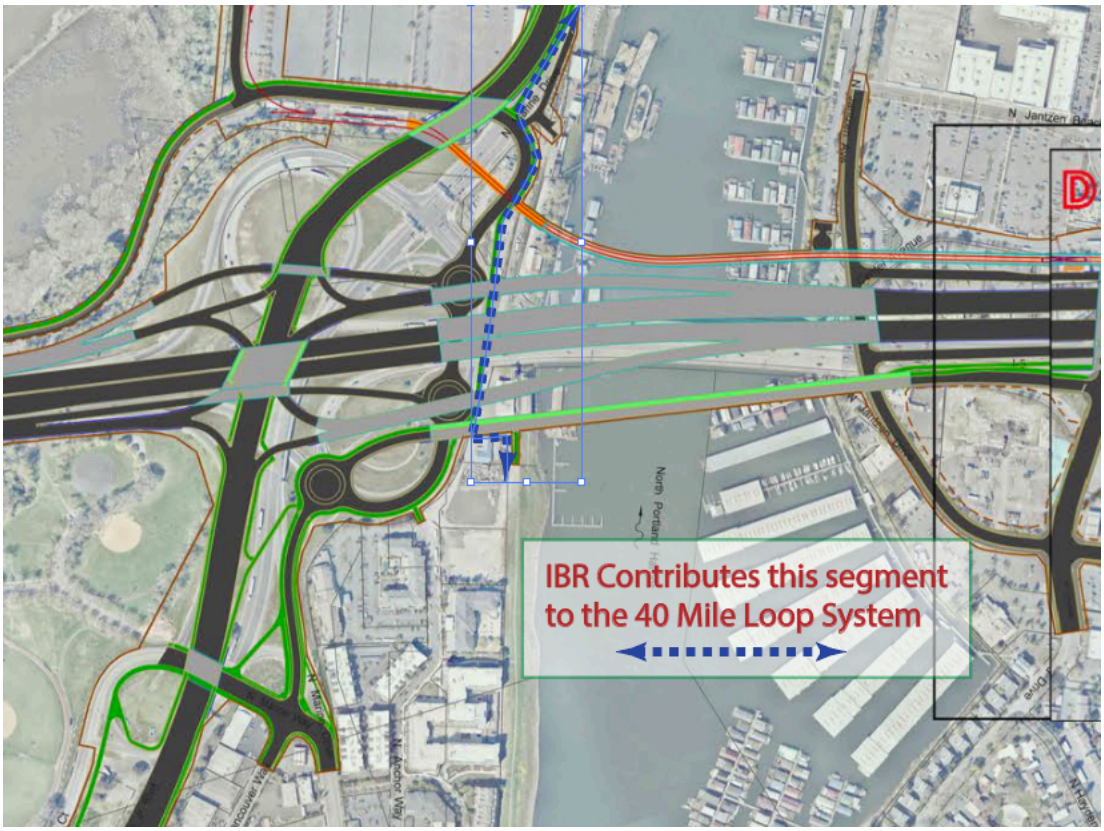
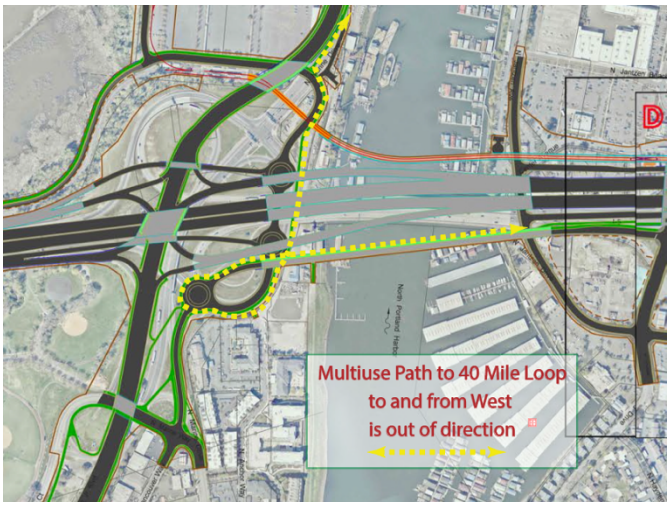
IBR Positive Contributions to the 40-Mile Loop Trail

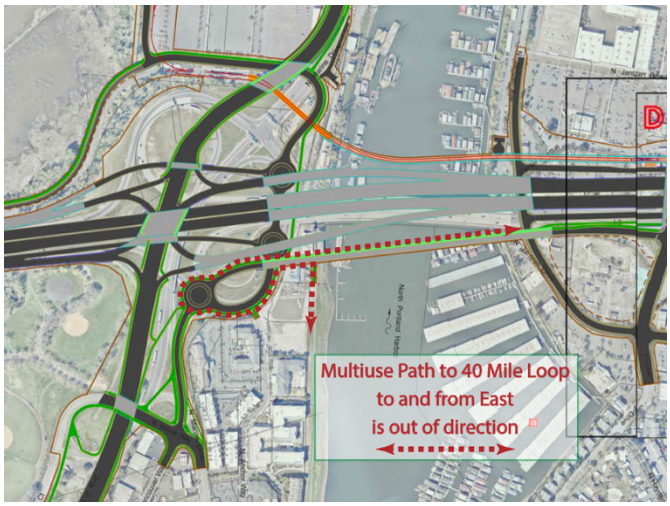
The IBR project will construct the segment of the 40-Mile Loop within the project area. This new trail segment will provide a safe, separated trail connecting the existing 40-Mile Loop trail located west of the proposed bridges through the project area, under the many new IBR bridges emanating from mainland Portland. After crossing under the local Harbor Bridge, the east most bridge proposed, the IBR will stub out the Trail to the East for a future connection to the Bridgeton Trails segment of the 40 Mile Loop. This is a good trail addition to the 40 Mile Loop and appreciated by the 40 Mile Loop Land Trust board.



Concerns with the Proposed Connection of 40 Mile Loop to the multiuse path on the local Harbor Bridge.

However, the proposed trail connections from the multiuse path on the local Harbor Bridge to the new 40-Mile Loop segment is not optimal. The proposed design requires users to travel out of their way, navigating a traffic circle and crossing vehicle lanes to reach both the eastbound and the westbound trail connection. This routing is neither convenient nor efficient and could discourage its use.





Request for Further Study of better East and West Connections to the 40 Mile Loop

We strongly recommend that alternative design options be considered to provide a more direct, connection to and from the east and west to the local Harbor Bridge multiuse path.

Possible additional study include:

1) Creating a direct connection from the East stub of the Bridgeton Trail to the sidewalk on the east side of the local Harbor Bridge. This direct connection would make it easier and more appealing for cyclists and pedestrians to cross the Harbor Bridge, while also offering a scenic route with views of North Portland Harbor and Mt Hood.
2) Additionally, we request that the sidewalk on the east side of the local Harbor Bridge be designed to be as wide as possible, with areas to rest and enjoy the views, further enhancing the experience for users.
3) Study more direct trail connections from the local Harbor Bridge multi use path to both the east and the west that do not involve routes around the Marine Drive traffic circles and crossing travel lanes.
4) Study routing the IBR entire multiuse path on the west side of the bridges rather than the east side. If the multiuse path was located on the light rail bridge on the west side, the east and west connection would be straight forward and direct. The west side multi use path is discussed more in a separate comment.
5) Lastly, we have a separate comment on ways the IBR could facilitate more just a stub for the east side connection to the Bridgeton Trail segment of the 40 Mile Loop.

Thank you!

Barbara J. Miller
531 N Bridgeton Road, Slip 39
Portland, Oregon 97217

IBR Draft SEIS - RECORD #2364 DETAIL

First Name :	Barbara
Last Name :	Miller
Attachments :	DSEIS-2364_Miller_Original.pdf (813 kb) Synergies_Empowered_by_the_IBR.pdf (812 kb)

IBR Draft SEIS - RECORD #2364 DETAIL

Submission Date :	11/17/2024
First Name :	Barbara
Last Name :	Miller
Business/Organization/Agency :	
Attachments :	Synergies_Empowered_by_the_IBR.pdf (812 kb)

Submission Input :

cannot read message

Draft SEIS Public Comment

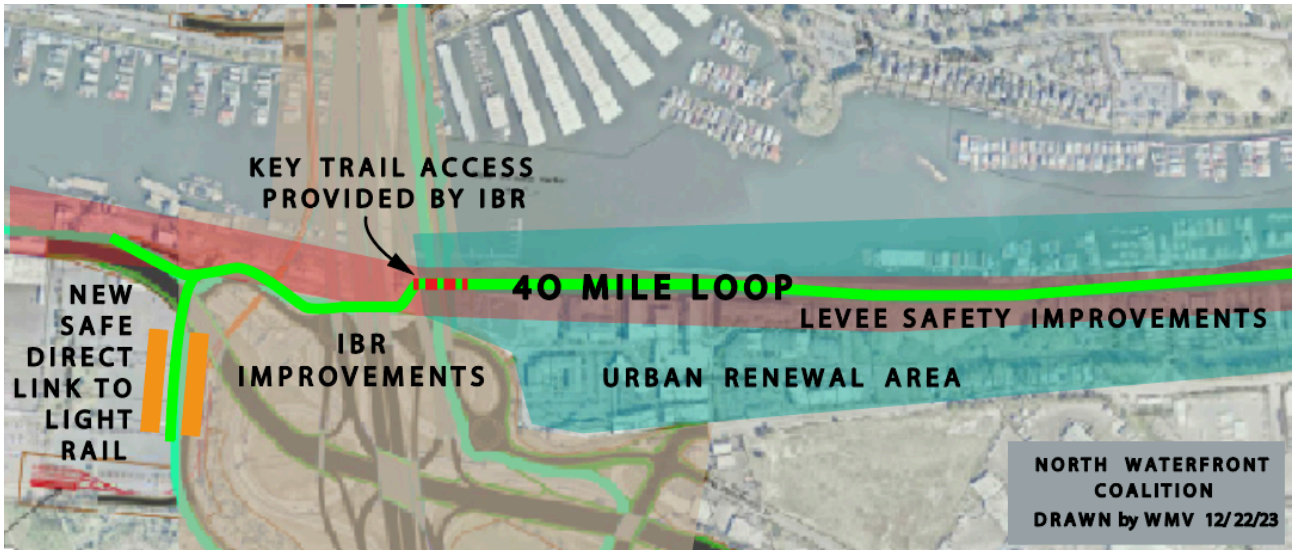
Synergies Empowered by the IBR

Coordinate synergies between improvements by the IBR and other large public and private projects being constructed at the same time. This synergy coordinated by the Cities of Portland and Vancouver could create public amenities greater than any of the individual projects could provide on their own.

Example: **Create Bridgeton Trail Segment of the 40 Mile Loop**

1) IBR Road system requires acquisition of property in order to build the new Harbor Bridges. That property under the new bridges finally puts into public ownership a key missing trail segment of the 40 Mile Loop.
2) At the same time as the IBR, the Army Corp of Engineers is upgrading the adjacent levee. The improved levee will be higher in elevation and finished with a compacted gravel maintenance road.
3) That key trail segment is also located in an existing Portland urban renewal district. The urban renewal district has already designed the finished trail, amenities and connections to local walkways. The urban renewal district had set aside funds to do the finish work once the trail easements were acquired.
4) By completing this Trail segment, Hundreds of residential units in Bridgeton have a direct, protected and safe way to walk and roll to the Expo Light Rail Station. This enhances ridership numbers for the IBR Light Rail and FTA funding requests.

The City of Portland can coordinate these projects together. Work IBR is already planning to do can create a synergy that builds a key piece of Trail infrastructure greater than any one project could do on their own.



This is just one example of possible synergies empowered through the IBR.
There are other synergies for Hayden Island, Vancouver Waterfront and Historic Reserve.

Thank you!

Barbara J. Miller
[redacted]

Draft SEIS Public Comment

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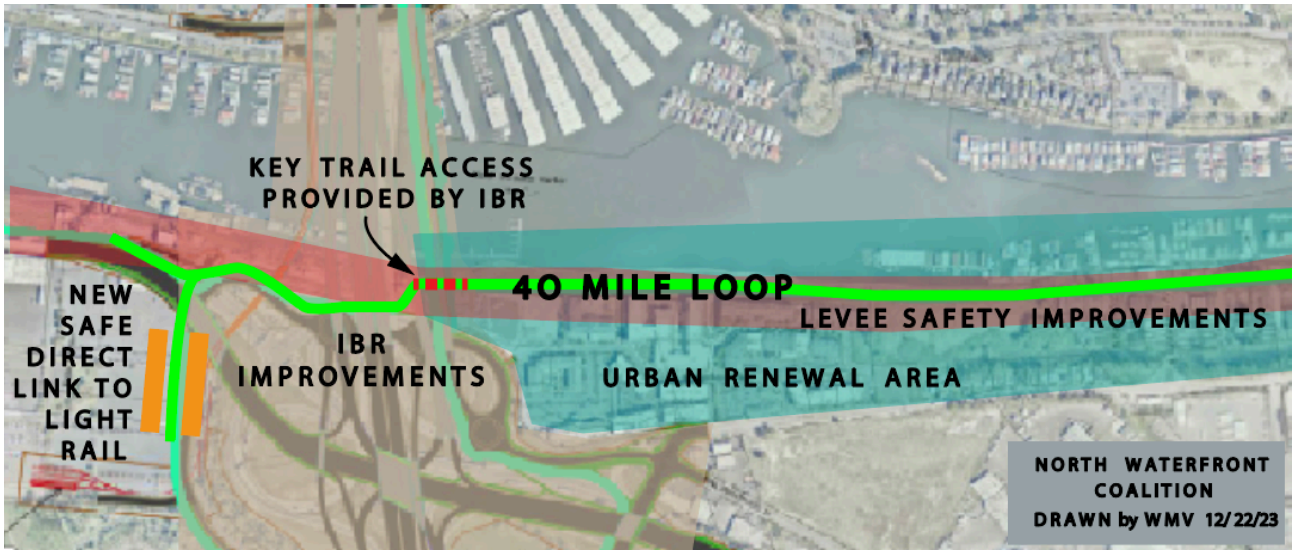

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Barbara J. Miller
531 N Bridgeton Road, Slip 39
Portland, Oregon 97217

IBR Draft SEIS - RECORD #2365 DETAIL

First Name :	Deb
Last Name :	Scott
Attachments :	MLK_Undercrossing.pdf (370 kb)

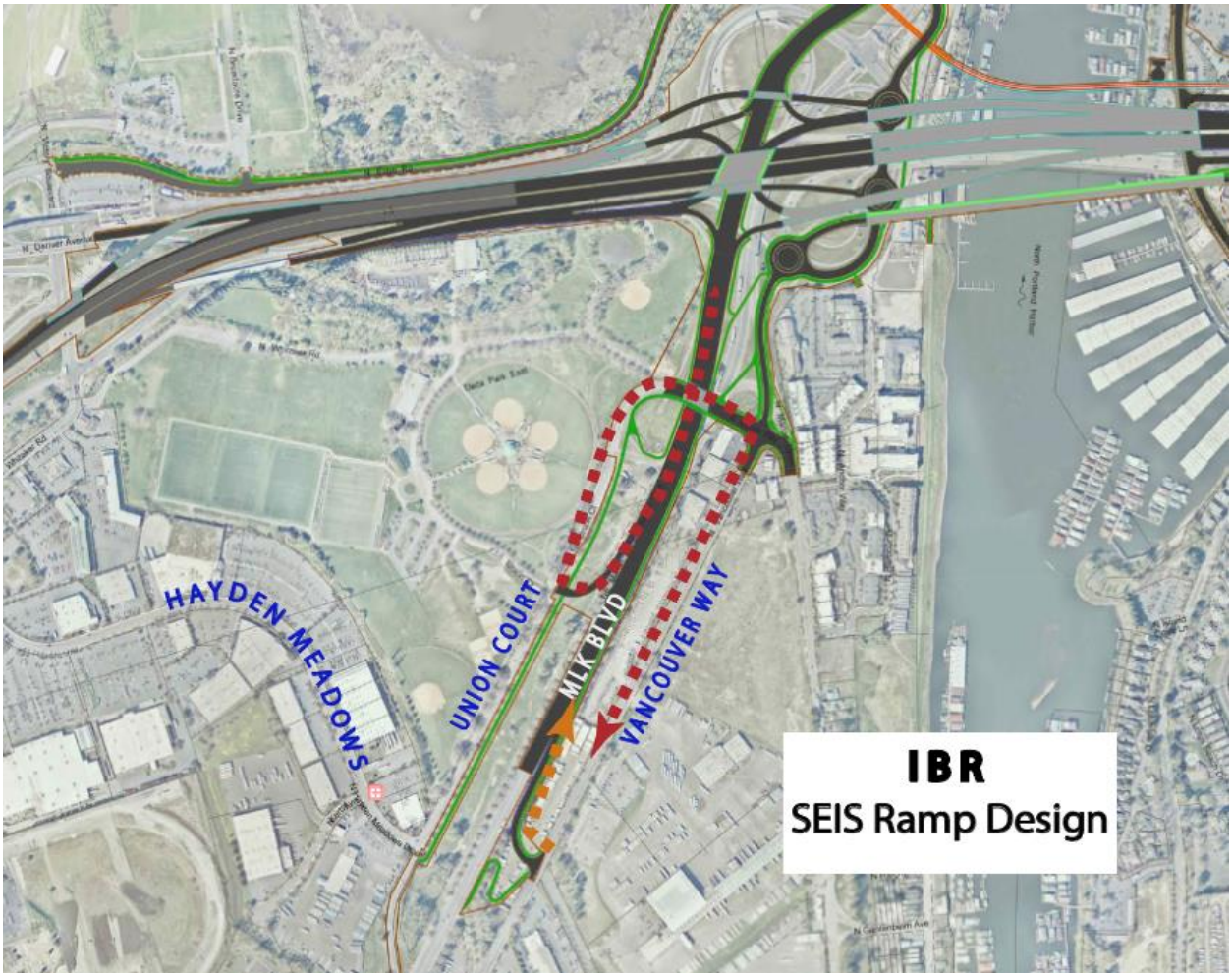
The MLK Undercrossing and Complete Interchange
Better Freight & Neighborhood Access Ramps for the IBR

Initial Proposed Design for MLK Access Ramps.

The Interstate Bridge Replacement (IBR) proposes a Martin Luther King (MLK) on-ramp and off-ramp design that meets very minimal requirements:

1) These ramps replace the existing ramp connections.
2) These ramps merge vehicles onto MLK further away from the Marine Drive single point intersection improving the merge/weave problems with the current intersection.

But this minimal ramp design does not excel with other important goals for Portland including efficient regional freight movement, recreational park safety and understandable way finding.



Problems with the proposed MLK ramp design

1) The proposed ramp design creates out of direction travel.
2) The proposed design is confusing to navigate. A traveler will take the off-ramp to leave the Marine Drive / MLK interchange, but not clearly see how to get back onto the Marine Drive / MLK interchange. There is the same way finding confusion in reverse

3) The proposed MLK off-ramp conflicts with Delta Park's primary recreational entrance. Since this a major Freight travel ramp, this ramp should not conflict with the major access to a major recreational area.
4) The proposed MLK ramp encourages Freight movement to use East Marine Drive for access when the Freight Master plan wants freight travel to use Columbia Blvd to MLK for Freight Access rather than East Marine Drive which is a local neighborhood roadway.

Proposal - MLK Undercrossing and Complete Intersection
There is a better design to meet all of IBR requirements while also meeting broader Portland Freight, Neighborhood and Parks planning goals.

This new ramp design proposes an undercrossing under MLK connecting Hayden Meadows Drive to Vancouver Way. This new MLK undercrossing combined with slightly relocated MLK on-ramps and off-ramps has the following advantages:

1) The Complete MLK Intersection minimizes out of direction travel.
2) The complete MLK intersection removes Freight users from the main Delta Park Entrance.
3) This design would be easier to navigate. It is more understandable for Freight and other users just how to get on and off MLK and the access the Marine Drive Interchange.

4) The new undercrossing meets the purpose and need of the IBR : (a) improve travel safety and traffic operations on the I-5 river crossing **and associated interchanges**; (c) **improve highway freight mobility** and address interstate travel and commerce needs in the Program. The MLK Undercrossing designs meets the purpose and needs better than the minimal IBR ramp design.
5) Lastly the MLK undercrossing provides a new way to access the Hayden Meadows Drive commercial shopping area. This new access could help off-set the removal of the direct access to Hayden Meadows that exist today from the current Marine Drive intersection to I-5 South to Interstate Ave off ramp. This existing off ramp connection from Marine Drive south bound on-ramp to Interstate Ave was removed to provide for the new Braided Ramp from Marine Drive to I-5. This Interstate Ave ramp connection from I-5 still exits if someone is on the main line of I-5. However Marine Drive travelers on the local Portland system wanting to access Interstate Ave in the IBR proposed design would have to travel through the three new Marine Drive traffic circles, then to Expo Road then connect to Interstate Ave. The MLK undercrossing design would create another more direct way to get to Hayden Meadows Drive and Interstate Ave.

IBR's Response to building the MLK Undercrossing

Have Portland Fund This – Not the IBR
This undercrossing has been proposed to the IBR early in the design process. IBR has stated that a MLK undercrossing might be nice to have but that the undercrossing should be something that City of Portland funds later.

A complete MLK Undercrossing and ramp design is more appropriate to be included in the IBR funding package. This undercrossing improves Freight connections for this intersection described as Oregon's Most Important Freight Interchange. The MLK Undercrossing excels at meeting the IBR purpose and need (c) **improve highway freight mobility**.

Rather than the IBR build a minimally acceptable ramp design and suggest the local city come back later and rebuild the preferred connection is not good public policy. The cost of the undercrossing would be an exceptionally large funding request for Portland. The Undercrossing is more appropriate to be funded in the budget for a project that describes itself as building a bridge to meet the needs for the next 100 years.

Please study the MLK undercrossing and full interchange design.
Involve the Freight Community, the local residents, Portland Transportation and Portland Parks. Let's work together to refine a ramp and undercrossing design that excels at meeting section C of the purpose and need of the IBR to improve freight mobility.

Thank you,
40 Mile Loop Land Trust
Approved by 40 Mile Loop Board on 11/11/2024

IBR Draft SEIS - RECORD #2366 DETAIL

First Name :	Barbara
Last Name :	Miller
Attachments :	DSEIS-2366_Miller_Original.pdf (4 mb) Separating_Freight__Bike_Travel.pdf (4 mb)

IBR Draft SEIS - RECORD #2366 DETAIL

Submission Date :	11/17/2024
First Name :	Barbara
Last Name :	Miller
Business/Organization/Agency :	
Attachments :	Separating_Freight__Bike_Travel.pdf (4 mb)

Submission Input :

cannot read message

Draft SEIS Public Comment

Separating Freight and Bike Travel
on the Marine Drive Interchange and On-Ramps

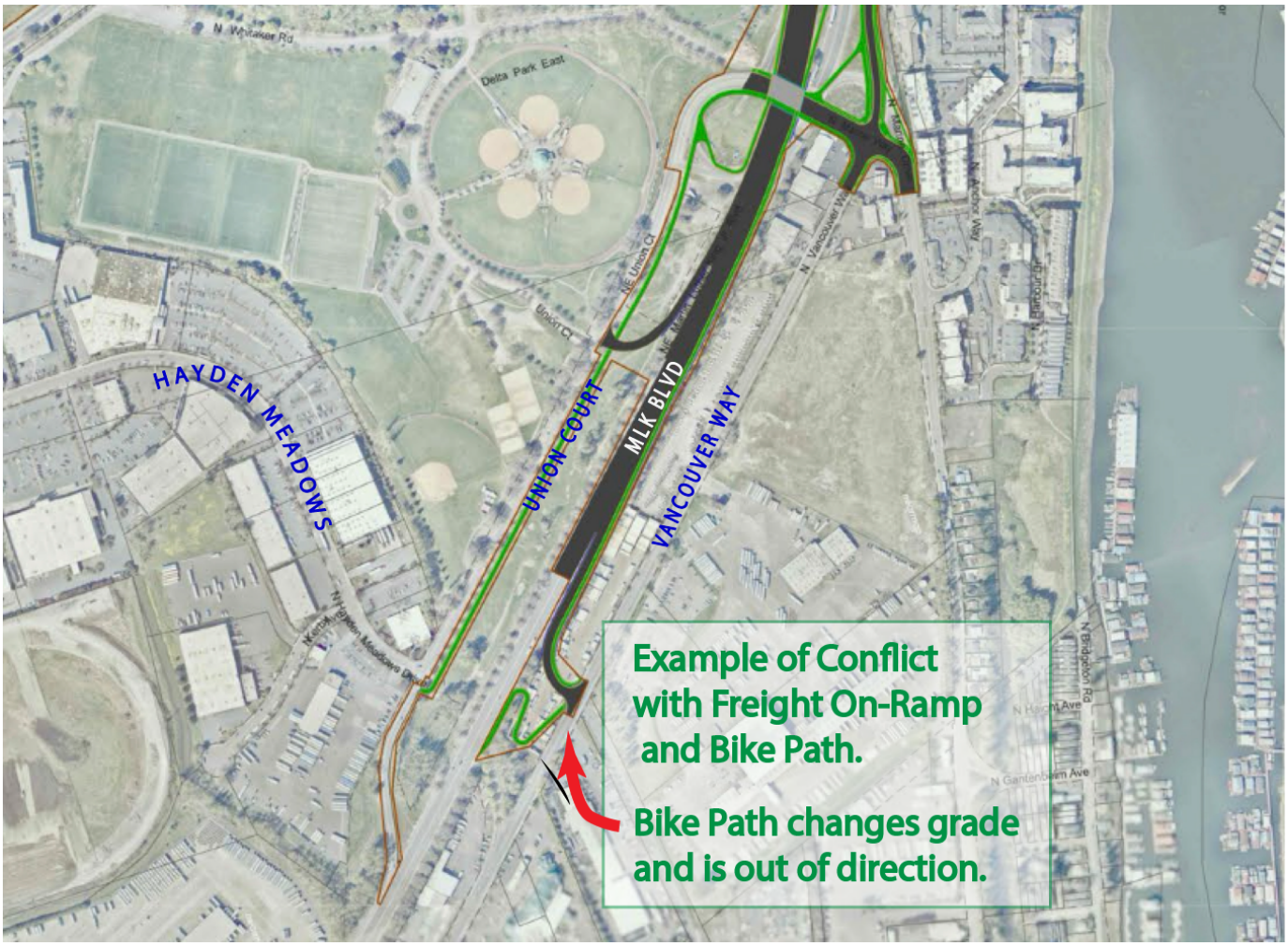
One important purpose and need of the IBR is to (c) improve highway freight mobility and address interstate travel and commerce needs in the Program area.

Another important purpose and need is to (b) improve connectivity, reliability, travel times, and operations of public transportation modal alternatives in the Program area.

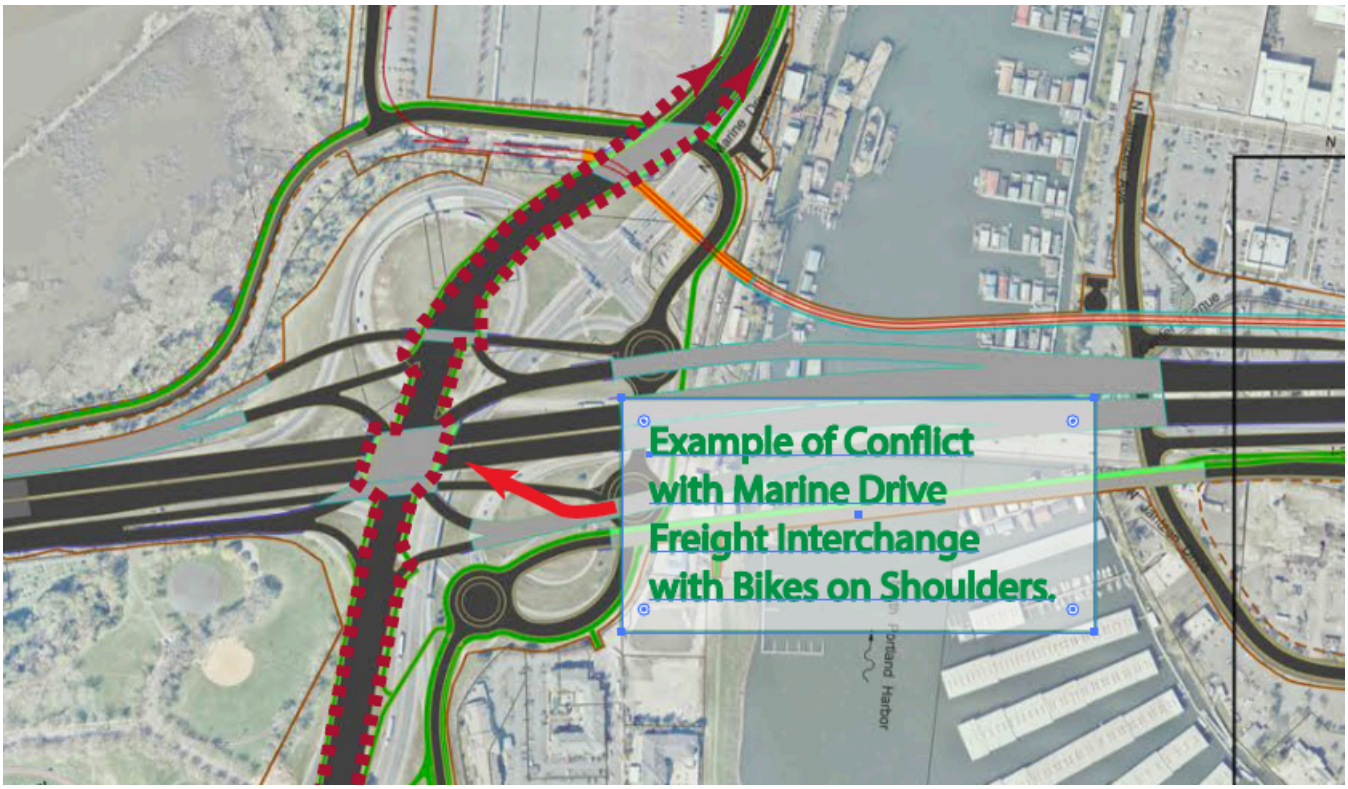
A way to meet the purpose and needs of both Freight Users and Active Transportation Users is to build active transportation routes physically separated from Freight routes as much as possible. Maximizing this separation is key to creating efficient Freight routes while creating safer, more attractive, and therefore more heavily used walking, rolling, and biking routes.

Examples of Conflicts between Freight and Active Transportation users.

The proposed IBR design for the ramp from Vancouver Way to MLK North poses significant conflict between Freight and Bikes, as the proposed Bike route travels changes grade along a switch back, crosses a major Freight intersection and climbs a grade up along a freight-heavy on-ramp.



Another example of possible Freight-Bike conflict is in the Marine Drive Interchange. Here IBR proposes to build a complete bike lanes and pedestrian sidewalk on both sides of the Interchange.



Even if the IBR is required by State Law to provide bike and pedestrian facilities on the Marine Drive interchange, we recommend additional study on improving two aspects of these improvements:

1) Any facilities for bike and ped that must be built on Marine Drive needs to be built in a way that separates bike and ped travel from Freight as much as possible using techniques such as barriers, and raised bike roadways.

2) To discourage any active transportation users from crossing the Marine Drive interchange, also build alternative routes that go around the Marine Drive Interchange rather than through the interchange. This separate bike ped system needs be so well design that it becomes the preferred route. Current IBR design has the MLK active user connection provided partially along MLK shoulders and partially on separated trails. To become the preferred route, an active transportation route that is not reliant of MLK shoulders need to be developed. This separated preferred corridor needs to conveniently link to each of the existing regional bike corridors.

Complete separation creates safety for both the people that are walking, biking and rolling in this area, but also makes it safer and more efficient for Freight Users who don't have to worry about negotiating on ramps with curves and with grade changes while watching out for bike users traveling the exact same routes.

This separation better meets 3 parts of the purpose and needs statement of the IBR; (a) improve travel safety and traffic operations on the I-5 river crossing and associated interchanges; (b) improve connectivity, reliability,

travel times, and operations of public transportation modal alternatives in the Program area; (c) improve highway freight mobility and address interstate travel and commerce needs in the Program area.

Given the Marine Drive interchange is usually described as the **most heavily used Freight corridor in Oregon**, we encourage the IBR to work with the Active Transportation Users in combination with the Freight Users **together rather than separately** to refine designs that efficiently moves Freight Users through the Marine Drive Interchange and Active Transportation Users around the Interchange.

Thank you!

Barbara J. Miller
[redacted]

Draft SEIS Public Comment

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on the Marine Drive Interchange and On-Ramps

One important purpose and need of the IBR is to (c) improve highway freight mobility and address interstate travel and commerce needs in the Program area.

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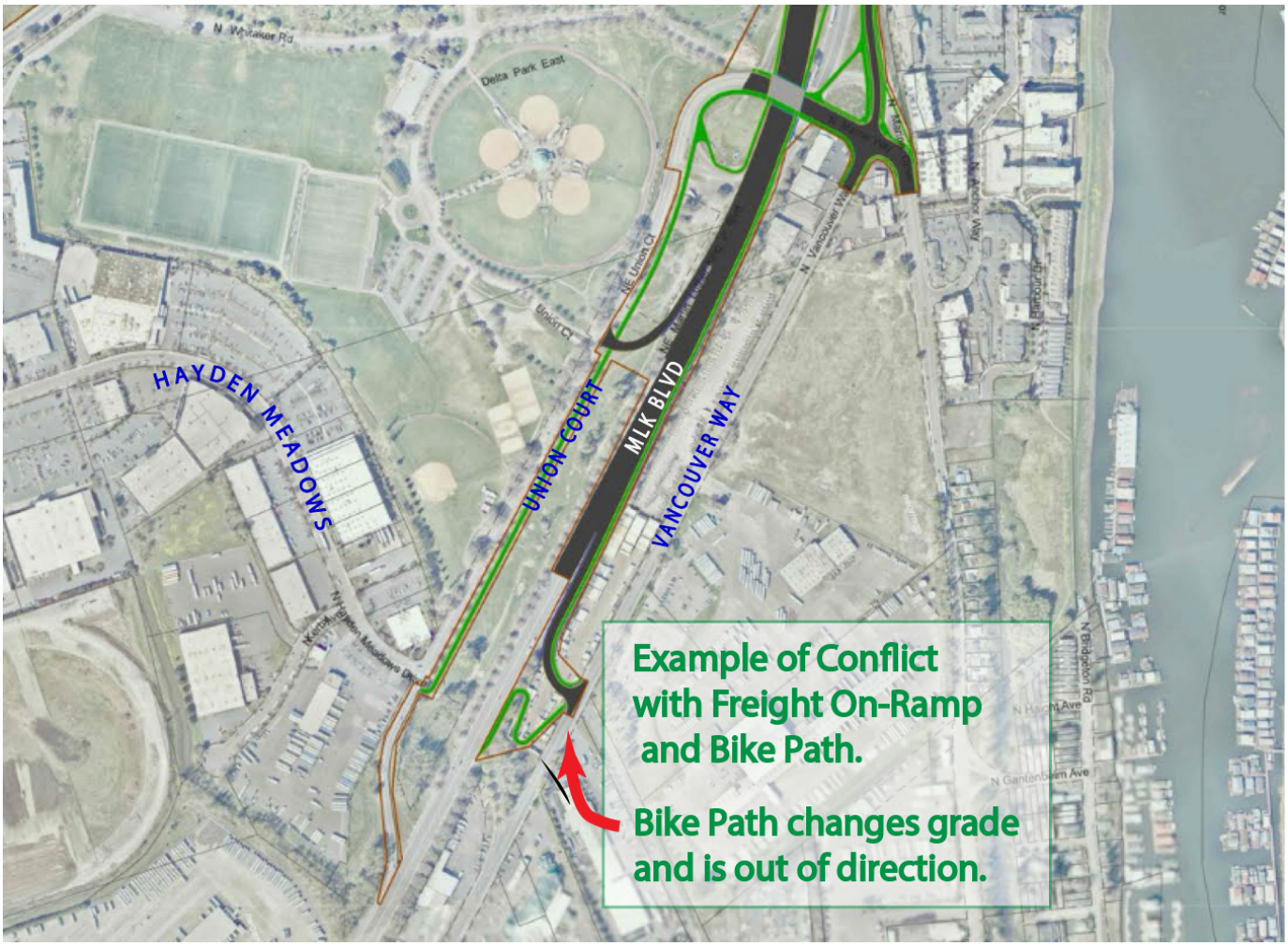

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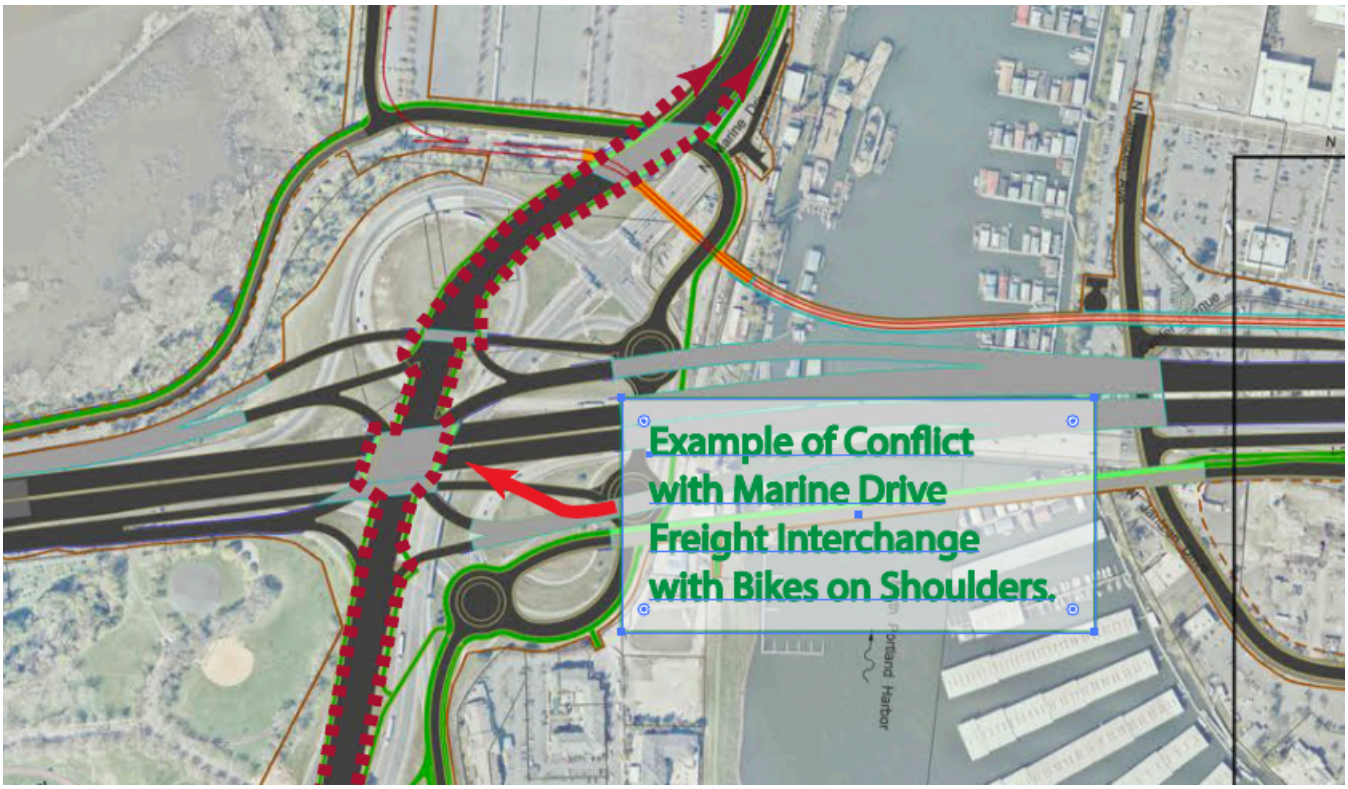

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Thank you!

Barbara J. Miller
531 N Bridgeton Road, Slip 39
Portland, Oregon 97217

IBR Draft SEIS - RECORD #2367 DETAIL

First Name :	Emily
Last Name :	Polanshek
Attachments :	DSEIS_2367_Polanshek_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #2367 DETAIL

Submission Date : 11/17/2024
First Name : Emily
Last Name : Polanshek
Business/Organization/Agency :

Submission Input :

First Name:
Emily

Last Name:
Polanshek

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Climate Change

Comment:
My personal interests, which I hope coincide with yours, are to protect the health and wellbeing of my own grandchildren and all children whether alive now or yet to be born.
The IBR project should be forward-thinking and in keeping with projections based on climate science. Oregon has goals to lower carbon pollution. Transportation is a major contributor. Have the planning and designs for the IBR project taken these into account in a serious way?

To me, doing so means the bridge replacement design should prioritize public transit and multi-modal forms of transportation over freeway expansion. Doing so will also protect the health of families living in close proximity to the miles of freeway expansion in current design options.
In sum, I am in favor of recommendations to scale back the size, scope and cost of this project. Let’s replace the existing Interstate bridge by making it safe, user-friendly and accessible to all who need to use it. Let’s make the new bridge adaptable to a future in which one person per car is no longer the most desirable – or only - way to get around.

JCA comment #: 510

IBR Draft SEIS - RECORD #2368 DETAIL

First Name :	Barbara
Last Name :	Miller
Attachments :	DSEIS-2368_Miller_Original.pdf (3 mb) MLK_Undercrossing.pdf (3 mb)

IBR Draft SEIS - RECORD #2368 DETAIL

Submission Date :	11/17/2024
First Name :	Barbara
Last Name :	Miller
Business/Organization/Agency :	
Attachments :	MLK_Undercrossing.pdf (3 mb)

Submission Input :

cannot read message

Draft SEIS public comment

The MLK Undercrossing and Complete Interchange — Better Freight & Neighborhood Access Ramps for the IBR

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The Interstate Bridge Replacement (IBR) proposes a Martin Luther King (MLK) on-ramp and off-ramp design that meets very minimal requirements:

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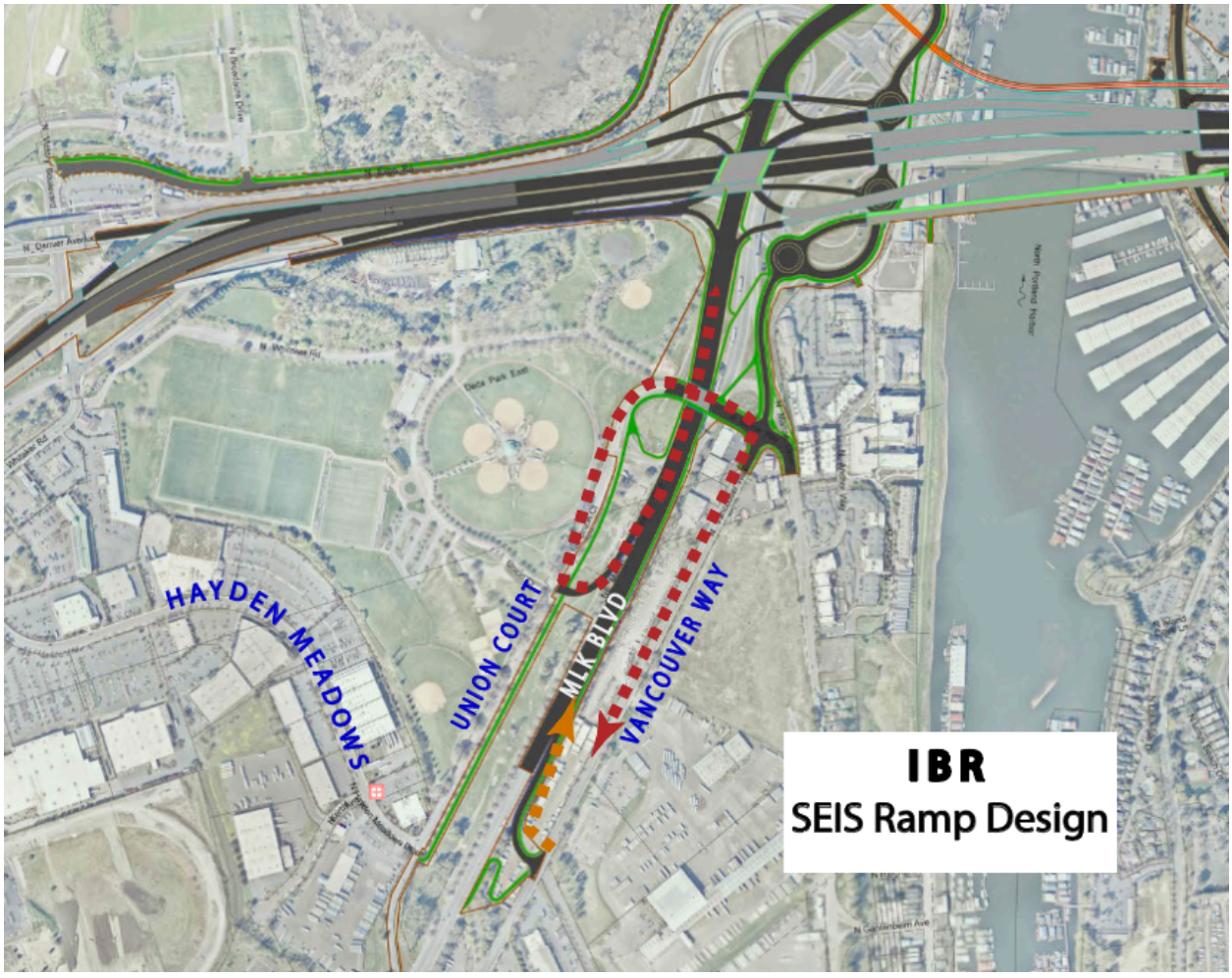

Problems with the proposed MLK ramp design

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Thank you!

Barbara J. Miller
[redacted]

[redacted]

Draft SEIS public comment

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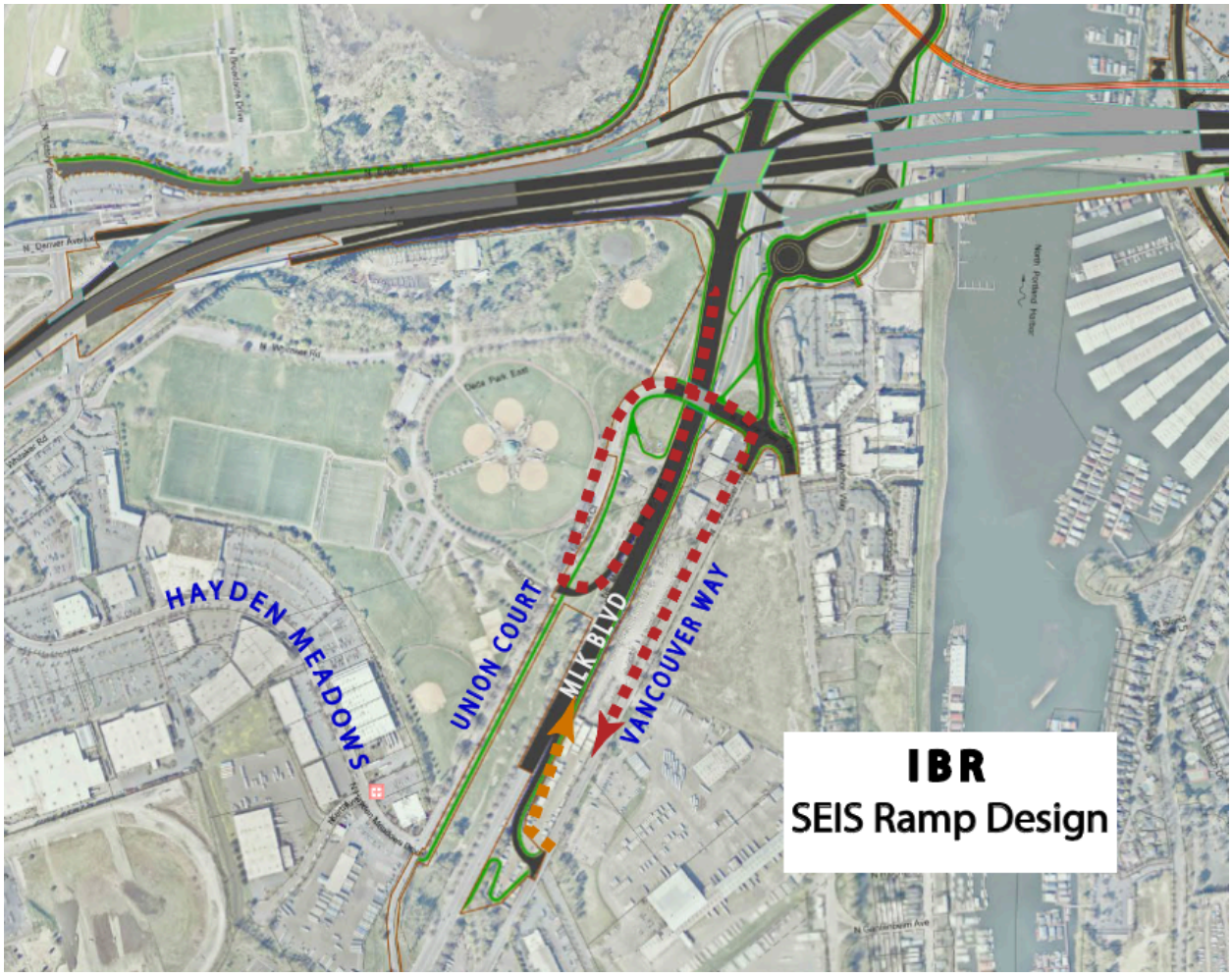

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3) This design would be easier to navigate. It is more understandable for Freight and other users just how to get on and off MLK and access the Marine Drive Interchange.
4) The new undercrossing meets the purpose and needs of the IBR : (a) improve travel safety and traffic operations on the I-5 river crossing **and associated interchanges**; (c) **improve highway freight mobility** and address interstate travel and commerce needs in the Program. The MLK Undercrossing designs meets the purpose and needs better than the minimal IBR ramp design.
5) Lastly the MLK undercrossing provides a new way to access the Hayden Meadows Drive commercial shopping area. This new access could help offset the removal of the direct access to Hayden Meadows that exist today from the current Marine Drive intersection to I-5 South to Interstate Ave off ramp. This existing off ramp connection from Marine Drive south bound on-ramp to Interstate Ave was removed to provide for the new Braided Ramp from Marine Drive to I-5. This Interstate Ave ramp connection from I-5 still exits if someone is on the main line of I-5. However Marine Drive travelers on the local Portland system wanting to access Interstate Ave in the IBR proposed design would have to travel through the three new Marine Drive traffic circles, then to Expo Road then connect to Interstate Ave. The MLK undercrossing design would create another more direct way to get to Hayden Meadows Drive and Interstate Ave.

IBR's Response to building the MLK Undercrossing

Have Portland Fund This – Not the IBR
This undercrossing has been proposed to the IBR early in the design process. IBR has stated that a MLK undercrossing might be nice to have but that the undercrossing should be something that City of Portland funds later.

A complete MLK Undercrossing and ramp design is more appropriate to be included in the IBR funding package. This undercrossing improves Freight connections for this intersection described as Oregon's Most Important Freight Interchange. The MLK Undercrossing excels at meeting the IBR purpose and need (c) **improve highway freight mobility**.

Rather than the IBR build a minimally acceptable ramp design and suggest the local city come back later and rebuild the preferred connection is not good public policy. The cost of the undercrossing would be an exceptionally large funding request for Portland. The Undercrossing is more appropriate to be funded in the budget for a project that describes itself as building a bridge to meet the needs for the next 100 years.

Please study the MLK undercrossing and full interchange design.
Involve the Freight Community, local residents, Portland Transportation, and Portland Parks. Let's work together to refine a ramp and undercrossing design that excels at meeting section C of the purpose and need of the IBR to improve freight mobility.

Thank you!

Barbara J. Miller
531 N Bridgeton Road, Slip 39

Portland, Oregon 97217

IBR Draft SEIS - RECORD #2370 DETAIL

First Name :	40
Last Name :	Mile Loop Land Trust
Attachments :	DSEIS-2370_MileLoopLandTrust_Original.pdf (197 kb)

IBR Draft SEIS - RECORD #2370 DETAIL

Submission Date :	11/17/2024
First Name :	40
Last Name :	Mile Loop Land Trust
Business/Organization/Agency :	40 Mile Loop Land Trust
Attachments :	Marine Drive Bike Lanes.pdf (201 kb)

Submission Input :

Hello IBR Team,

Enclosed is a public comment on the IBR Draft SEIS for your review and records, re: Marine Drive Bike Lanes.

Thank you,

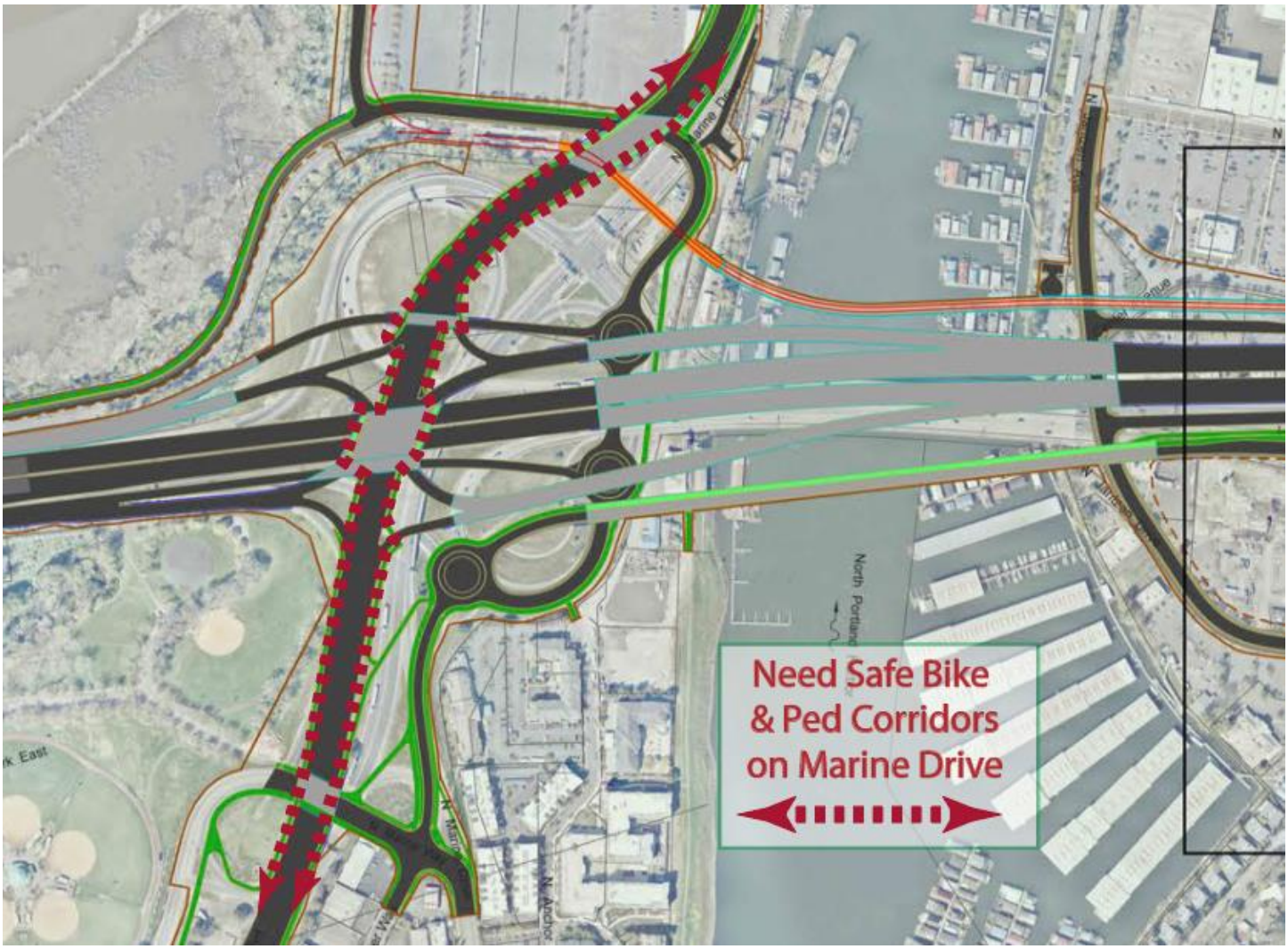
Deb Scott
Treasurer
40 Mile Loop Land Trust

[redacted] (used on our Board's Secretary of State filing)
Mailing address: 4[redacted]
[redacted]
www.40mileloop.org
Email:[redacted]

Comments on Freight and Bike conflicts on the Marine Drive Single Point Interchange

The IBR proposed design for Bike lanes through the Marine Drive Single Point Interchange presents a major conflict between bike and Freight movements. As the Marine Drive interchange is considered to be one of the most important Freight Interchanges in the State of Oregon, we request that these pathways for active transportation be built separated from Freight movements to provide safe passage for active transportartion users.

This meets the purpose and needs of the IBR to (b) improve connectivity, reliability, travel times, and operations of public transportation modal alternatives in the Program area and(c) improve highway freight mobility and address interstate travel and commerce needs in the Program area.



Please study how these corridors could be built separated from the vehicle travel lanes using barriers or raised active transportation path ways. In addition, the IBR should study how to use the new technologies of sensors that detect active transportation user approaching intersections crossings. These advanced sensors triggers traffic signals, so that users crossing through many these intersections does not have to individually press a button at each crossing and wait for the signal to change one crossing at a time.

Thank you
40 Mile Loop Land Trust
Approved by 40 Mile Loop Board on 11/12/24

IBR Draft SEIS - RECORD #2371 DETAIL

First Name :	Barbara
Last Name :	Miller
Attachments :	DSEIS-2371_Miller_Original.pdf (205 kb)

IBR Draft SEIS - RECORD #2371 DETAIL

Submission Date :	11/17/2024
First Name :	Barbara
Last Name :	Miller
Business/Organization/Agency :	
Attachments :	Marine Drive Bike Lanes.pdf (1 mb)

Submission Input :

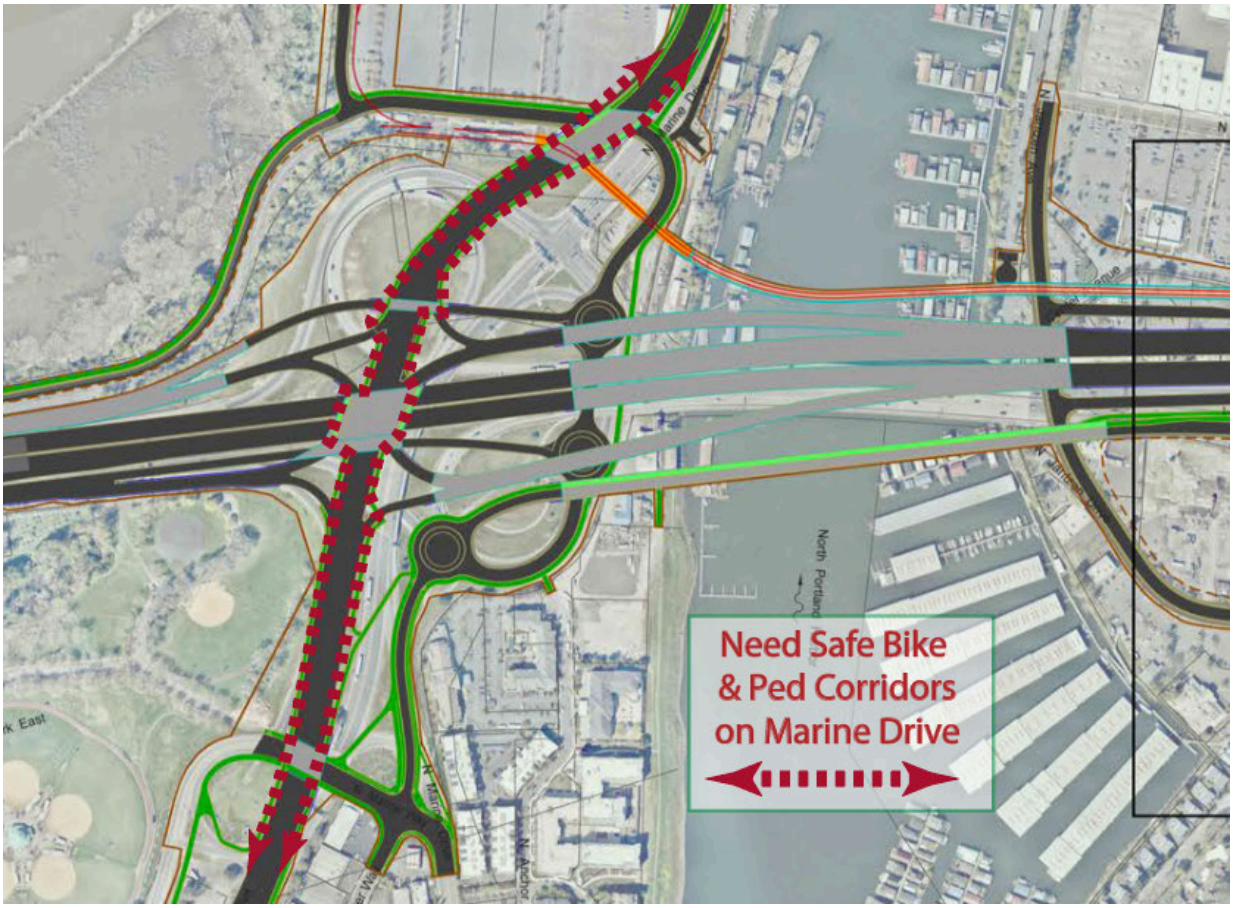
cannot read message

Draft SEIS public comment

Comments on Freight and Bike conflicts on the Marine Drive Single Point Interchange

The IBR proposed design for bike lanes through the Marine Drive Single Point Interchange presents a major conflict between **bike** and **freight** movements. As the Marine Drive interchange is considered to be one of the most important **freight** Interchanges in the State of Oregon, I request that these pathways for active transportation be built separated from **freight** movements to provide safe passage for active transportation users.

This meets the purpose and needs of the IBR to (b) improve connectivity, reliability, travel times, and operations of public transportation modal alternatives in the Program area and (c) improve highway freight mobility and address interstate travel and commerce needs in the Program area.



Please study how these corridors could be built separated from the vehicle travel lanes using barriers or raised active transportation pathways. In addition, the IBR should study how to use the new technologies of sensors that detect active transportation user approaching intersections crossings. These advanced sensors trigger traffic signals, so that users crossing through many of these intersections do not have to individually press a button at each crossing and wait for the signal to change, one crossing at a time.

Thank you!

Barbara J. Miller
[redacted]

IBR Draft SEIS - RECORD #2372 DETAIL

First Name :	Barbara
Last Name :	Miller
Attachments :	DSEIS-2372_Miller_Original.pdf (651 kb)

IBR Draft SEIS - RECORD #2372 DETAIL

Submission Date :	11/17/2024
First Name :	Barbara
Last Name :	Miller
Business/Organization/Agency :	
Attachments :	Comments Bridge Architecture.pdf (658 kb)

Submission Input :

cannot read message

Draft SEIS public comment

Comments on the Importance of the Architectural Design of the new Bridges

Once the project decides whether the main bridges are going to be single level bridges, stack-style bridges or lift-style bridges, the IBR project will develop the aesthetic characteristics of the final bridges.

I request that, once the bridge configuration is determined, the IBR will hold a public process on the final architectural design of not only the main bridges but the entire bridge corridor. This process could be modeled after similar processes that Portland has done in the past for Tilikum Crossing and the new Burnside Bridge. Both of these processes were led by National Design Experts in collaboration with Local Design Experts, the project engineers, and members of the public to recommend a final bridge architecture to the region's leaders.

I believe the aesthetics of these bridges matter, and that they are an important inspiration that helps move the project forward. The architectural style of the bridges creates a gateway to both Oregon and Washington. The view of the bridges from the Vancouver shoreline and Hayden Island are important to the future developments in those areas.

Should the IBR select the stack bridges as the best option, that bridge structure, even though it is a basic truss, can be executed with finesse. Remember the bridges crossing North Portland Harbor could have architectural significance as well. Imagine driving over the Harbor between twin cable-stayed bridges on each side, one beautiful structure holding up the light rail bridge, and its twin holding up the local Harbor bridge.

The region is investing a lot into these bridges that will be part of our environment for a long time. Let's build something we are proud to leave to our children and our children's children.

Thank you!

Barbara J. Miller
[redacted]

IBR Draft SEIS - RECORD #2373 DETAIL

First Name :	40
Last Name :	Mile Loop Land Trust
Attachments :	DSEIS-2373_40MileLoopLandTrust_Original.pdf (212 kb)

IBR Draft SEIS - RECORD #2373 DETAIL

Submission Date :	11/17/2024
First Name :	40
Last Name :	Mile Loop Land Trust
Business/Organization/Agency :	40 Mile Loop Land Trust
Attachments :	Comments on Cork Screw Ramps.pdf (216 kb)

Submission Input :

Hello IBR Team,

Enclosed is a public comment on the IBR Draft SEIS for your review and records, re: Cork Screw Ramps.

Thank you,

Deb Scott
Treasurer
40 Mile Loop Land Trust

[redacted] (used on our Board's Secretary of State filing)
Mailing address: [redacted]
[redacted]
www.40mileloop.org
Email: [redacted]

Comments on the separation of the Multiuse Path Cork Screw Ramps and Light Rail Stations Stair and Elevators

The IBR proposes building the light rail line on the south bound main bridge. The Vancouver shoreline light Rail Station is approximately 100' in elevation above the ground and is access through stairs and elevators.

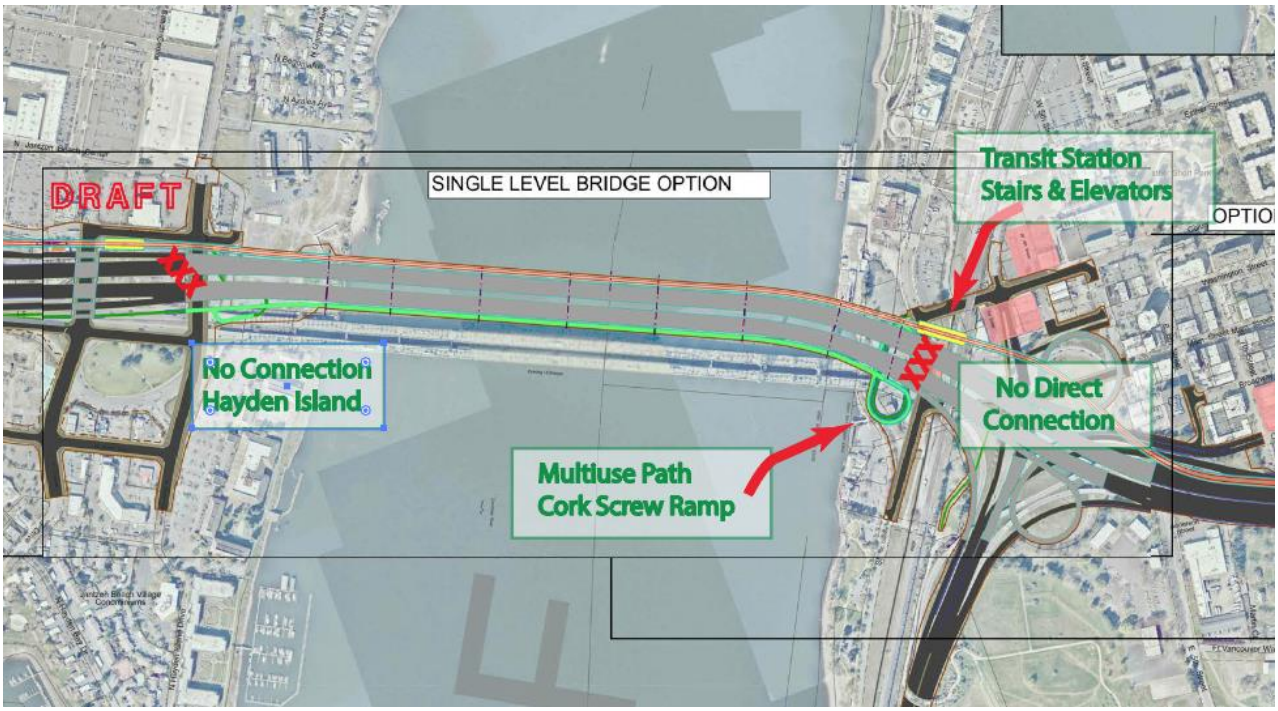
The multiuse path is built on the north bound main bridge span. The end point of the multiuse path on the Vancouver shoreline is approximately 100' in elevation above the ground and is access by a cork screw ramp of approx. ½ mile in length.

Though the Vancouver shoreline Light Rail Station and the end point of the Multiuse Trail are adjacent to each other and are both 100' in elevation above the ground, the access systems for each are entirely separate from each other. The stairs and elevators for transit users are not usable for users of the multiuse path. The ramp connection for multiuse path users that are not usable for transit riders.

The Hayden Island light rail station and Oregon side of the main bridge multiuse path has the same disconnection, though the elevation is less at about 35' above ground.

People who are not driving to their destination, a goal of the IBR, will often use several modes to reach their destination. Users may ride their bikes to a light rail station, place their bikes on the train in storage specially design for bikes on the light rail train, then ride their bikes for the final leg of their trip. The IBR design of entirely separate light rail and multiuse path access makes these blended trips difficult.

We believe additional study is needed to connect these two systems together.



Thank you
40 Mile Loop Land Trust
Approved by 40 Mile Loop Board on 11/11/2024

IBR Draft SEIS - RECORD #2374 DETAIL

First Name :	40
Last Name :	Mile Loop Land Trust
Attachments :	DSEIS-2374_MileLoopLandTrust_Original.pdf (134 kb)

IBR Draft SEIS - RECORD #2374 DETAIL

Submission Date :	11/17/2024
First Name :	40
Last Name :	Mile Loop Land Trust
Business/Organization/Agency :	
Attachments :	Comments Bridge Architecture.pdf (139 kb)

Submission Input :

Hello IBR Team,

Enclosed is a Draft SEIS public comment for your review and records,
Bridge Architecture.

Thank you,

Deb Scott
Treasurer
40 Mile Loop Land Trust

[redacted] (used on our Board's
Secretary of State filing)
Mailing address: [redacted]
[redacted]
www.40mileloop.org
info@40mileloop.org

Comments on the Importance of the Architectural Design of the new Bridges.

Once the project decides whether the main bridges are going to be a single level bridges, stack style bridges or lift style bridges, the IBR project will develop the aesthetic characteristics of the final Bridges.

We request that once the bridge configuration is determined the IBR will hold a public process on the final architectural design of not only the main bridges but the entire bridge corridor. This process could be modeled after similar processes that Portland has done in the past for Tilikum Crossing and the new Burnside Bridge. Both of these processes were led by National Design Experts in collaboration with Local Design Experts, the project engineers and members of the public to recommend a final bridge architecture to the region's leaders.

We believe the aesthetics of these bridges matter, and that they are an important inspiration that helps move the project forward. The architectural style of the bridges creates a gateway to both Oregon and Washington. The view of the bridges from the Vancouver shoreline and Hayden Island are important to the future developments in those areas.

Should the IBR select the stack bridges as the best option, that bridge structure, even though it is a basic truss, can be executed with finesse. Remember the bridges crossing North Portland Harbor could have architectural significance as well. Imagine driving over the Harbor between twin cable-stayed bridges on each side, one beautiful structure holding up the light rail bridge, and its twin holding up the local Harbor bridge.

Even a flat bridge can have architectural significance. How the constraints of the project are resolved in the hands of a talented Bridge Architect become the Bridge's unique beauty.

The region is investing a lot into these bridges that will be part of our environment for a long time. Let's build something we are proud to leave to our children and our children's children.

Thank you
40 Mile Loop Land Trust
Approved by 40 Mile Loop Board on 11/12/24

IBR Draft SEIS - RECORD #2375 DETAIL

First Name :	Nicholas
Last Name :	Peeters
Attachments :	DSEIS-2375_Peeters_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #2375 DETAIL

Submission Date : 11/17/2024
First Name : Nicholas
Last Name : Peeters
Business/Organization/Agency :

Submission Input :

First Name:
Nicholas

Last Name:
Peeters

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
Hi,
Portland resident and cyclist here that would like to comment on the IBR Draft SEIS because the design proposed for active transportation - cycling and pedestrian use specifically - seems likely to discourage rather than encourage those modes of use.
My main concerns are:
- The giant 10 story spiral off ramp for cyclists and pedestrians on the Vancouver end. That would seem like a terrible pedestrian or riding experience - and the mere thought of having to navigate will discourage it's use. Isn't there an option for an elevator or to extend the exit further north towards the Northern end of Vancouver which is at higher elevation?

- The positioning of the bike/pedestrian lane adjacent to car traffic lanes. As an occasional cyclist user of the existing bridge I can tell you that proximity to traffic while riding sucks. As a former Brooklyn New York resident I bike commuted daily to downtown Manhattan for years over the Brooklyn and Williamsburg bridges and they both provided much better isolation from traffic to what is being proposed here. A better option would be positioning the bike/pedestrian lane next to the light rail allowing the light rail to act as a buffer from the cars. That would also encourage multimodal use by making transferring between the light rail and walking or cycling much easier.
Thanks,
Nick Peeters

JCA comment #: 509

IBR Draft SEIS - RECORD #2377 DETAIL

First Name :	Garlynn
Last Name :	Woodsong
Attachments :	DSEIS-2377_Woodsong_Original.pdf (273 kb)

IBR Draft SEIS - RECORD #2377 DETAIL

Submission Date :	11/17/2024
First Name :	Garlynn
Last Name :	Woodsong
Business/Organization/Agency :	PLACE Initiative
Attachments :	IBR_Comment_Letter_PLACE_Initiative_Nov_16_2024.pdf (274 kb)

Submission Input :

First Name:
Garlynn

Last Name:
Woodsong

Business or Organization:
PLACE Initiative

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Climate Change

Comment:
To whom it may concern,

PLACE Initiative is a national nonprofit that works to provide solutions to the climate and social justice crises using place-based, community-driven programs centered around responsible land use planning to prevent urban sprawl and combat systemic inequities. Comprised of planners, geographers, designers, and climate adaptation professionals, we at PI know that the built environment cannot be ignored within the discussion of climate change, and we envision a world where conservation of open space, efficient use of natural resources, and reduction of carbon emissions are as important to the planning of cities and towns as is fiscal growth.

In our analysis of why transit, bicycle, and pedestrian projects appear to be stalled across Oregon, the preliminary findings are that most of the available money (as a percentage of total transportation spending impacting the state) and bandwidth (in terms of state and regional planning capacity) is being diverted to freeway expansion projects, including the Interstate Bridge Replacement (IBR) project. If these were big, transformational investment projects that would usher in a brighter future for residents, that would be one thing. However, multiple independent analyses indicate that all of these freeway expansion projects are unnecessary, and largely are a complete waste of taxpayer dollars, committed without an adequate examination of the opportunity costs of not using those same dollars to instead expand bicycle, pedestrian, and transit infrastructure across the state (and across state lines).

For instance, the Just Crossing Alliance (JCA) has released (available at: https://justcrossing.org/2024/10/23/independent-traffic-modeling-analysis-garbage-in-garbage-out/) an independent assessment of IBR traffic modeling, conducted by our colleague, national transportation modeling expert Norman Marshall, president of Smart Mobility. Mr. Marshall specializes in analyzing the relationships between the built environment and travel behavior, and doing planning that coordinates multi-modal transportation with land use and community needs. A key finding of the report is that the Draft Supplement Environmental Impact Statement (DSEIS) forecasts more traffic in the corridor in the no-build scenario than is physically possible (a similar error in the CRC EIS has been confirmed by historical data). JCA members reacted to the information noting that if the no-build forecast is invalid, then all the environmental analysis in the DSEIS is without basis! Other conclusions of the Marshall report include that:

The Interstate bridge is not the I-5 bottleneck in either direction

Widening the bridge would do nothing to improve I-5 congestion, and could make it worse, because expanded bridge capacity will funnel even more tra?c into the actual, unresolved bottlenecks.

Congestion to the south “meters” traffic on the bridge during peak periods, and traffic cannot grow without road expansion to the south

Metro’s regional Kate model, relied on in the DSEIS, significantly overestimates peak period traffic today, and

forecasts impossible traffic growth in the future

The DSEIS modeling is useless for understanding future tra?c conditions because it overstates future tra?c growth and fails to account for capacity limitations.

This impossible traffic growth forecast is the basis for the DSEIS traffic metrics, i.e., garbage in – garbage out

Higher speed AND higher throughput are possible, without expansion, through better ramp metering, and/or system-wide tolling

Implementing system-wide tolling on I-5 would actually address the I-5 congestion that the IBR project falsely claims to address. ODOT's Regional Mobility Pricing Project analysis (September 11, 2023) found that system-wide tolling would improve speeds, and increase throughput.

Transit investments could help address I-5 congestion, but the SDEIS models are not reliable in evaluating transit alternatives.

The JCA has also released an "Active Transportation and Transit Vision" report (https://justcrossing.org/wp-content/uploads/2024/11/Just-Crossing-Alliance-Active-Transportation-Vision.pdf), which further suggests that:

"The Climate section of the DSEIS makes it clear that ambient temperatures around the bridge will frequently exceed 100°F in summer months. Factoring in heat island effects, this will make the active transportation path unusable unless the multi-use path is shaded. Shading with plantings could additionally act as "the lungs of the bridge" helping with air quality." We would concur, and suggest trees be planted on both sides of the multi-use path, so it is shaded in both morning and afternoon hours. The tree root structures on the bridge could also be used to help absorb bridge runoff and pre-treat it before it leaves the bridge structure.

"On the Washington side, the multi-use path stops at the waterfront. This does not match the need and leaves us with a challenging spiral path ascending/descending more than 100 feet. It also puts travelers from northern parts of Vancouver in the challenging position of traveling downhill through the city, then having to gain that elevation back on the ramp system. The Active Transportation Working Group has identified this as "the Vancouver dip." Instead, the multi-use path should continue north, at least to the "community connector" at Evergreen and most appropriately to the northern extent of the project area." This lack of attention to the details of how non-auto users might interact with the new structures is indicative of a lack of professional competency amongst the bridge team, amongst their myopic focus on constructing new facilities for cars, at all costs. Shame on the project team.

"On the Oregon side, while the connection to the Kenton neighborhood appears reasonably robust, the connections to the MLK corridor area will leave active transportation users in no-man's land. Securing a complete, safe and comfortable connection to the popular Vancouver/Williams corridor is a priority. The Active Transportation Working Group has also identified a lack of connections to the 40-mile loop and we look forward to additional detailed connectivity suggestions in their comments." We concur completely. A project of this size

must result in net benefits for all; ignoring important connections for bicycles and pedestrians is just further proof of the incompetency of all involved with the state DOTs running this project.

In a separate comment letter, the JCA further recommends (https://justcrossing.org/wp-content/uploads/2024/11/JCA-Overview-DSEIS-Comment-Letter.pdf) that:

“The multi-use path must be positioned adjacent to the transit way to allow seamless transfers between modes and to make the transit elevators available to path users. In this configuration transit would also serve to buffer path users from the noise, debris and other impacts of the auto lanes. The path should also be shaded to protect users in the much hotter summer months the DSEIS anticipates.” We concur.

“An additional conclusion of the independent Marshall report was that even before constructing an IBR project current travel times could be reduced by a combination of better ramp metering and a corridor-wide pricing plan to manage demand including some form of the Regional Mobility Pricing Project previously proposed for the Oregon section of I-5. Such a policy would bolster transit demand, manage other bottlenecks in the corridor and decrease the need for additional auto lane capacity, helping right-size the project.” We concur.

“Transit benefits will flow disproportionately to white, non-Hispanic residents and the burdens of noise and tolls will be disproportionately borne by low-income and equity priority communities. We must do better.” We concur. This project will perpetuate inequitable outcomes, doubling down on a history of inequity in this region that is rooted in white supremacy. There is no reasonable justification for such a project.

We have grave concerns about how much of this project is related to widening the freeway and its approach structures and ramps on the Washington side of the river; we would much prefer to see the scope of this project limited to the bridge itself, and not include these other freeway-widening elements that have contributed to more than a doubling in costs to replace the bridge. We still believe that the Common Sense Crossing approach, of retrofitting the existing bridge, then building a new, parallel span just for light rail, bikes, pedestrians, and local access traffic to and from Hayden Island, would result in an overall lower-cost project and, in combination with tolls and pricing, could deliver more congestion relief benefits for less cost. We continue to object to the obscenely large price tag of this un-needed bridge mega-project. We concur with the JCA’s, who find that “this project is not, as advertised, a bridge replacement but rather a five mile freeway widening.”

We therefore recommend that this project be shelved for the foreseeable future. Instead, we recommend that the relevant transportation agencies coordinate to undertake the following actions:

Undertake work to drill new pilings and retrofit the existing bridges so they could withstand a major earthquake

Implement variable-rate pricing in the corridor for the purpose of managing congestion

Use toll proceeds to pay for the construction of a new, local-access-only bridge that supports light rail, bicycles, and pedestrians, connecting from Vancouver to Hayden Island, and another bridge with a similar cross-section from Hayden Island on into Portland

Also use toll proceeds to increase transit frequencies on the Amtrak Cascades line, including new commuter rail service from Vancouver into Portland, with trains running at least once every 15 minutes during peak hours

Use toll proceeds to purchase the railroad ROW from Seattle to Portland, allowing for the ROW to be electrified, to add tracks, and to manage rail operations to balance new high-frequency rail commuter operations with freight rail movements

Use toll proceeds to construct new bicycle paths connecting to and from the bridge at Vancouver, Hayden Island, and Oregon.

Then, once these actions are complete, it could be possible that the time will be right in 2045 or 2050 to resume work on this bridge replacement project, if further analysis at that time continues to show a need for a new facility.

Until that time, this project should be canceled, and all employees who worked on it should be let go and given the freedom to seek other employment opportunities. There have been sufficient professional mistakes made on this project that nobody who worked on it, and did not object strenuously, should be ever allowed to work on a similar transportation project or for a transportation agency again.

Sincerely yours,

Garlynn G. Woodsong

Executive Director

PLACE Initiative

[redacted]

[redacted]

[redacted]

Attachment (maximum one):

IBR_Comment_Letter_PLACE_Initiative_Nov_16_2024.pdf

JCA comment #: 508

PLACE INITIATIVE

Proactive Leadership Advocating for Climate & Equity

November 16, 2024

To whom it may concern,

PLACE Initiative is a national nonprofit that works to provide solutions to the climate and social justice crises using place-based, community-driven programs centered around responsible land use planning to prevent urban sprawl and combat systemic inequities. Comprised of planners, geographers, designers, and climate adaptation professionals, we at PI know that the built environment cannot be ignored within the discussion of climate change, and we envision a world where conservation of open space, efficient use of natural resources, and reduction of carbon emissions are as important to the planning of cities and towns as is fiscal growth.

In our analysis of why transit, bicycle, and pedestrian projects appear to be stalled across Oregon, the preliminary findings are that most of the available money (as a percentage of total transportation spending impacting the state) and bandwidth (in terms of state and regional planning capacity) is being diverted to freeway expansion projects, including the Interstate Bridge Replacement (IBR) project. If these were big, transformational investment projects that would usher in a brighter future for residents, that would be one thing. However, multiple independent analyses indicate that all of these freeway expansion projects are unnecessary, and largely are a complete waste of taxpayer dollars, committed without an adequate examination of the opportunity costs of not using those same dollars to instead expand bicycle, pedestrian, and transit infrastructure across the state (and across state lines).

For instance, the Just Crossing Alliance (JCA) has released (available at: https://justcrossing.org/2024/10/23/independent-traffic-modeling-analysis-garbage-in-garbage-out/) an independent assessment of IBR traffic modeling, conducted by our colleague, national transportation modeling expert Norman Marshall, president of Smart Mobility. Mr. Marshall specializes in analyzing the relationships between the built environment and travel behavior, and doing planning that coordinates multi-modal transportation with land use and community needs. A key finding of the report is that the Draft Supplement Environmental Impact Statement (DSEIS) forecasts more traffic in the corridor in the no-build scenario than is physically possible (a similar error in the CRC EIS has been confirmed by historical data). JCA members reacted to the information noting that if the no-build forecast is invalid, then all the environmental analysis in the DSEIS is without basis! Other conclusions of the Marshall report include that:

- The Interstate bridge is not the I-5 bottleneck in either direction
- Widening the bridge would do nothing to improve I-5 congestion, and could make it worse, because expanded bridge capacity will funnel even more traffic into the actual, unresolved bottlenecks.
- Congestion to the south “meters” traffic on the bridge during peak periods, and traffic cannot grow without road expansion to the south
- Metro’s regional Kate model, relied on in the DSEIS, significantly overestimates peak period traffic today, and forecasts impossible traffic growth in the future

- The DSEIS modeling is useless for understanding future traffic conditions because it overstates future traffic growth and fails to account for capacity limitations.
- This impossible traffic growth forecast is the basis for the DSEIS traffic metrics, i.e., garbage in – garbage out
- Higher speed AND higher throughput are possible, without expansion, through better ramp metering, and/or system-wide tolling
- Implementing system-wide tolling on I-5 would actually address the I-5 congestion that the IBR project falsely claims to address. ODOT's Regional Mobility Pricing Project analysis (September 11, 2023) found that system-wide tolling would improve speeds, and increase throughput.
- Transit investments could help address I-5 congestion, but the SDEIS models are not reliable in evaluating transit alternatives.

The JCA has also released an "Active Transportation and Transit Vision" report (https://justcrossing.org/wp-content/uploads/2024/11/Just-Crossing-Alliance-Active-Transportation-Vision.pdf), which further suggests that:

- "The Climate section of the DSEIS makes it clear that ambient temperatures around the bridge will frequently exceed 100°F in summer months. Factoring in heat island effects, this will make the active transportation path unusable unless the multi-use path is shaded. Shading with plantings could additionally act as "the lungs of the bridge" helping with air quality." We would concur, and suggest trees be planted on both sides of the multi-use path, so it is shaded in both morning and afternoon hours. The tree root structures on the bridge could also be used to help absorb bridge runoff and pre-treat it before it leaves the bridge structure.
- "On the Washington side, the multi-use path stops at the waterfront. This does not match the need and leaves us with a challenging spiral path ascending/descending more than 100 feet. It also puts travelers from northern parts of Vancouver in the challenging position of traveling downhill through the city, then having to gain that elevation back on the ramp system. The Active Transportation Working Group has identified this as "the Vancouver dip." Instead, the multi-use path should continue north, at least to the "community connector" at Evergreen and most appropriately to the northern extent of the project area." This lack of attention to the details of how non-auto users might interact with the new structures is indicative of a lack of professional competency amongst the bridge team, amongst their myopic focus on constructing new facilities for cars, at all costs. Shame on the project team.
- "On the Oregon side, while the connection to the Kenton neighborhood appears reasonably robust, the connections to the MLK corridor area will leave active transportation users in no-man's land. Securing a complete, safe and comfortable connection to the popular Vancouver/Williams corridor is a priority. The Active Transportation Working Group has also identified a lack of connections to the 40-mile loop and we look forward to additional detailed connectivity suggestions in their comments." We concur completely. A project of this size must result in net benefits for all; ignoring important connections for bicycles and pedestrians is just further proof of the incompetency of all involved with the state DOTs running this project.

In a separate comment letter, the JCA further recommends (https://justcrossing.org/wp-content/uploads/2024/11/JCA-Overview-DSEIS-Comment-Letter.pdf) that:

- "The multi-use path must be positioned adjacent to the transit way to allow seamless transfers between modes and to make the transit elevators available to path users. In this configuration transit would also serve to buffer path users from the noise, debris and other impacts of the auto lanes. The path should also be shaded to protect users in the much hotter summer months the DSEIS anticipates." We concur.
- "An additional conclusion of the independent Marshall report was that even before constructing an IBR project current travel times could be reduced by a combination of better ramp metering and a corridor-wide pricing plan to manage demand including some form of the Regional Mobility Pricing Project previously proposed for the Oregon section of I-5. Such a policy would bolster transit demand, manage other bottlenecks in the corridor and decrease the need for additional auto lane capacity, helping right-size the project." We concur.
- "Transit benefits will flow disproportionately to white, non-Hispanic residents and the burdens of noise and tolls will be disproportionately borne by low-income and equity priority communities. We must do better." We concur. This project will perpetuate inequitable outcomes, doubling down on a history of inequity in this region that is rooted in white supremacy. There is no reasonable justification for such a project.

We have grave concerns about how much of this project is related to widening the freeway and its approach structures and ramps on the Washington side of the river; we would much prefer to see the scope of this project limited to the bridge itself, and not include these other freeway-widening elements that have contributed to more than a doubling in costs to replace the bridge. We still believe that the Common Sense Crossing approach, of retrofitting the existing bridge, then building a new, parallel span just for light rail, bikes, pedestrians, and local access traffic to and from Hayden Island, would result in an overall lower-cost project and, in combination with tolls and pricing, could deliver more congestion relief benefits for less cost. We continue to object to the obscenely large price tag of this un-needed bridge mega-project. We concur with the JCA's, who find that "this project is not, as advertised, a bridge replacement but rather a five mile freeway widening."

We therefore recommend that this project be shelved for the foreseeable future. Instead, we recommend that the relevant transportation agencies coordinate to undertake the following actions:

- Undertake work to drill new pilings and retrofit the existing bridges so they could withstand a major earthquake
- Implement variable-rate pricing in the corridor for the purpose of managing congestion
- Use toll proceeds to pay for the construction of a new, local-access-only bridge that supports light rail, bicycles, and pedestrians, connecting from Vancouver to Hayden Island, and another bridge with a similar cross-section from Hayden Island on into Portland

- Also use toll proceeds to increase transit frequencies on the Amtrak Cascades line, including new commuter rail service from Vancouver into Portland, with trains running at least once every 15 minutes during peak hours
- Use toll proceeds to purchase the railroad ROW from Seattle to Portland, allowing for the ROW to be electrified, to add tracks, and to manage rail operations to balance new high-frequency rail commuter operations with freight rail movements
- Use toll proceeds to construct new bicycle paths connecting to and from the bridge at Vancouver, Hayden Island, and Oregon.

Then, once these actions are complete, it could be possible that the time will be right in 2045 or 2050 to resume work on this bridge replacement project, if further analysis at that time continues to show a need for a new facility.

Until that time, this project should be canceled, and all employees who worked on it should be let go and given the freedom to seek other employment opportunities. There have been sufficient professional mistakes made on this project that nobody who worked on it, and did not object strenuously, should be ever allowed to work on a similar transportation project or for a transportation agency again.

Sincerely yours,

Garlynn G. Woodsong
Executive Director
PLACE Initiative
[redacted]

IBR Draft SEIS - RECORD #2379 DETAIL

First Name :	Aaron
Last Name :	Brown
Attachments :	DSEIS_2379_Brown_Original.pdf (3 mb) ExpertSaysTrafficModelingforInterstateBridgeReplacementIsWrong.pdf (3 mb)

IBR Draft SEIS - RECORD #2379 DETAIL

Submission Date :	11/17/2024
First Name :	Aaron
Last Name :	Brown
Business/Organization/Agency :	
Attachments :	Expert-Says-Traffic-Modeling-for-Interstate-Bridge-Replacement-Is-Wrong.pdf (3 mb)

Submission Input :

First Name:
Aaron

Last Name:
Brown

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Induced Demand

Comment:
I'm appalled by the gamesmanship and data manipulation of traffic projections undertaken by the IBR's planning team, as uncovered by the independent consultants hired by the Just Crossing Alliance and covered in Willamette Week. Our two states desperately need a seismically-sound, multimodal crossing to connect these two communities, and it's disturbing to read the brazen dishonesty baked into the clearly inaccurate traffic projections on which this entire $7 billion highway project is based. To move forward with this project as currently designed based on obviously flawed and inaccurate data would be in direct defiance of federal law and any coherent attempts at accountable, transparency governance. The largest public works project in the

and any coherent attempts at accountable, transparency governance. The largest public works project in the history of the Pacific Northwest has been artificially bloated by self-interested consultants, and this oversized bridge project is simply too large, too polluting, and too expensive for the communities of Portland and Vancouver to absorb. I support the approach of right-sizing this bridge and inclusion of transit as articulated in the positions of the Just Crossing Alliance and No More Freeways

Attachment (maximum one):
Expert-Says-Traffic-Modeling-for-Interstate-Bridge-Replacement-Is-Wrong.pdf

JCA comment #: 507

WILLAMETTE WEEK

Expert Says Traffic Modeling for Interstate Bridge Replacement Is Wrong

**The bi-state bridge project is t
studied investment whose cos**

Expand

Traffic on the Interstate 5 Bridge. (Henry Cromett)

By Nigel Jaquiss

November 11, 2024 at 7:13 pm PST

A new examination of the assumptions underlying the proposed Interstate Bridge between Portland and Vancouver says the project relies on bogus numbers.

The new study was commissione
wants to reduce the freeway con
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and pedestrian improvements.

"The traffic modeling the whole

based on is a work of fiction," says Chris Smith of the Portland group No More Freeways, which is part of the Just Crossing Alliance.

Norman Marshall, president of Smart Mobility Inc., a Vermont traffic consulting firm, says the rationale for building a new, wider bridge (estimated cost: $5 billion to $7.5 billion)—that it will relieve congestion—is simply wrong.

"The congestion is caused by bottlenecks to the south—at North Lombard in the southbound a.m. peak and at Victory Boulevard in the p.m. northbound peak," Marshall wrote in his report. "And there is no possibility that widening the bridge can address those problems."

Greg Johnson, program administrator for the bridge replacement, which is a joint venture between the Oregon and Washington transportation departments, says Marshall's criticism misses the mark.

Readers Respond to Oregon's Population Decline, and other... ×

"The Interstate Bridge replacem
regional transportation network
will reduce congestion and impr
we cannot solve the region's cor
outside of the program area, but

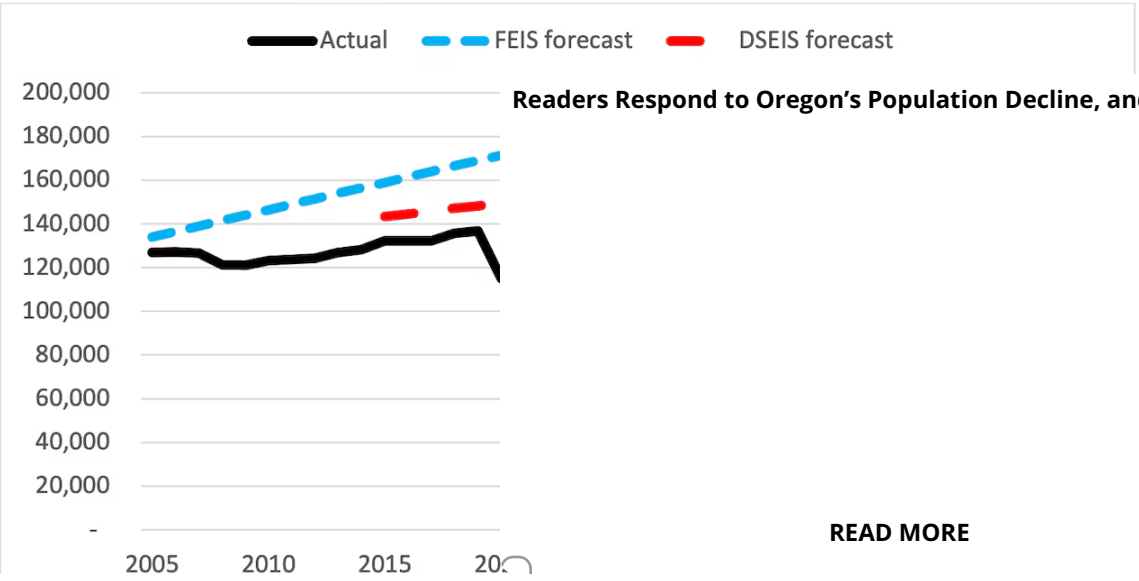
READ MORE

efficient. Design improvements, multimodal investments, including extension of light rail and express bus enhancements, safety shoulders throughout the IBR Program area, variable rate tolling, and the addition of an auxiliary lane across the bridge to enhance ramp-to-ramp connections will help improve the flow of traffic both on the bridge and throughout the IBR 5-mile program corridor."

Marshall's report says the draft supplemental environmental impact statement, a federally required document meant to take a comprehensive look at the costs and benefits of the project, relied on old numbers and an outdated forecasting model. He provided a couple of examples of how the methodology underlying the project has previously produced inaccurate forecasts of traffic volumes.

Here's a snapshot of how previous projections have overestimated daily traffic on the I-5 bridge.

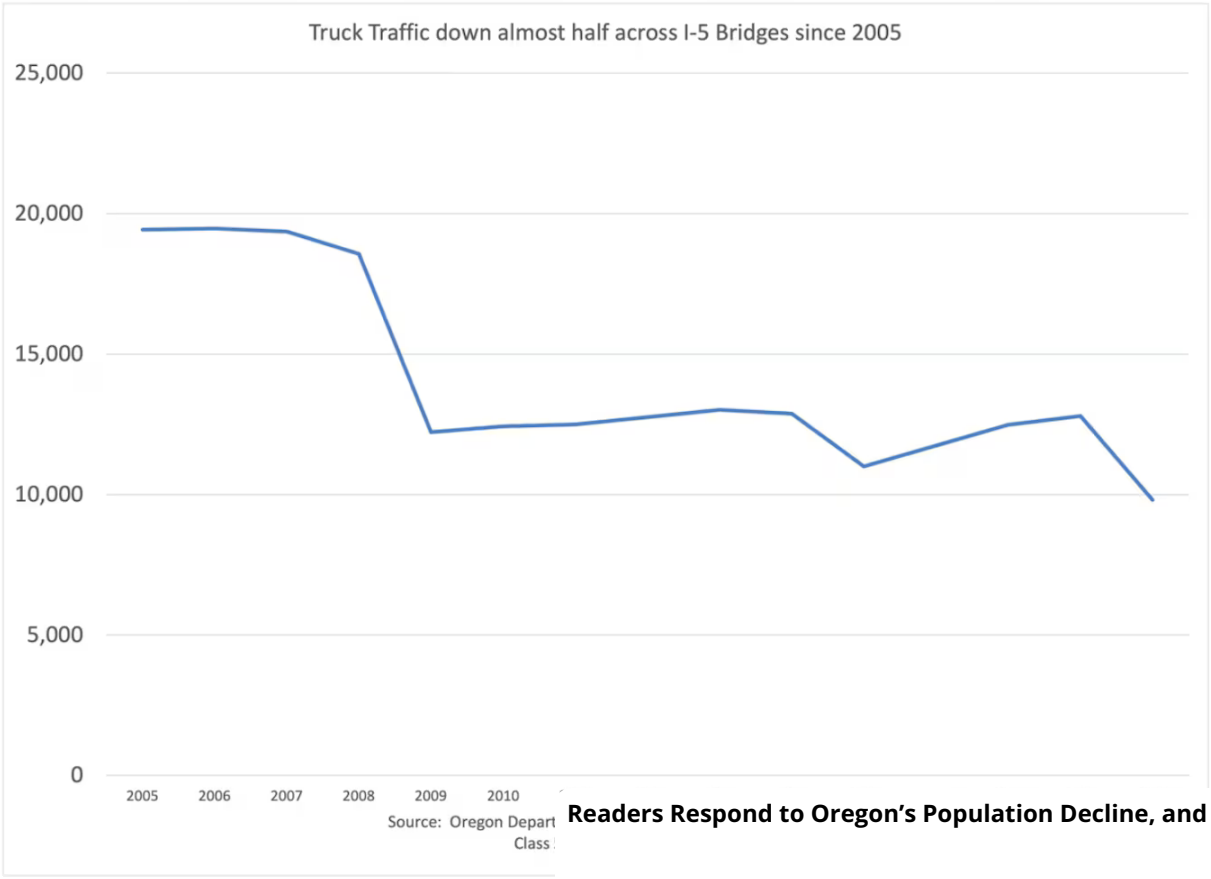
Figure 12: Average Weekday Bridge Traffic and FEIS and DSEIS Forecasts



Forecast traffic exceeds actual traffic.

And although truck traffic moves essential goods across the bridge and is hampered by congestion, Oregon Department of Transportation data included in Marshall's report shows truck traffic is down over the past 20 years. City Observatory first reported the truck data.

Figure 14: Daily Class 5-13 Truck Traffic on I-5 Bridges (ODOT Traffic Count data)



Truck volume declines over time.

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The IBR program's Johnson acknowledges the draft supplemental environmental report relies on old numbers and a static model from the regional government Metro, but he says his colleagues have augmented that model with additional analysis.

"Traffic modeling presented in the draft supplemental environmental impact statement is based on the most current information available when IBR started modeling work to support the draft SEIS: the 2018 Regional Transportation Plan jointly developed and adopted by both Metro and the Southwest Washington Regional Transportation Council," Johnson says.

"The IBR program conducted analysis and modeling in addition to the Metro regional travel demand model to produce future traffic forecasts in the program area," Johnson a
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Metro spokesman Nick Christensen defends his agency's work, adding that it believes a bridge replacement is necessary.

"The model results we provided to IBR are from a model that looks at travel patterns at a regional level—it estimates the number of daily trips across the Columbia River on both bridges. The 'dynamic' model Mr. Marshall cites is a supplement to, not a component of, regional models like Metro's. IBR did not ask Metro for any data beyond the output from the regional 'static' model we provided," Christensen says.

"We think our model performs well when estimating transportation choices at a regional level—the basis for a lot of decisions on large projects, like the proposal to replace our 107-year-old drawbridge over the Columbia River."

So what's the solution? Marshall says the highway departments should focus on using cheaper tools, such as ramp meters or tolls, to manage traffic more efficiently. (Gov. Tir
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reduce traffic on Interstates 5 ar
a live option.)

"The ramp meter system can be

impractical to rely solely on ramp metering," Marshall's report says. "Variable tolling certainly can achieve uninterrupted flow on I-5," the report concludes. "The sum of the monetary value of the resulting time savings would be far greater than the out-of-pocket toll expenses, and equity issues could be addressed through investments in non-auto travel modes and with targeted rebates."

The IPR program is taking public comment on the draft supplemental environmental impact statement through Nov. 18. To make a comment, click here.

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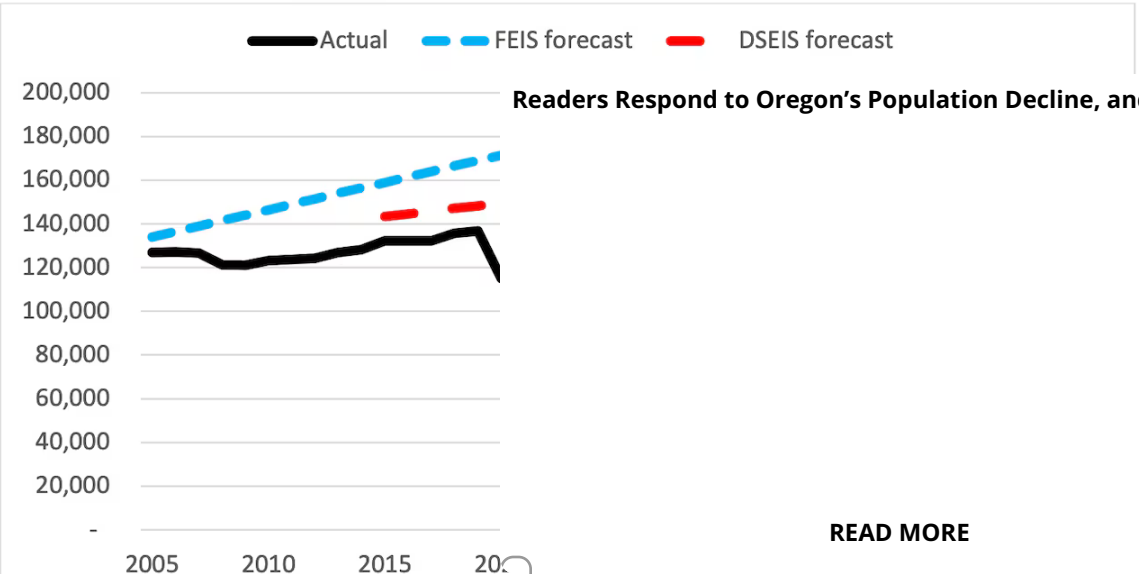

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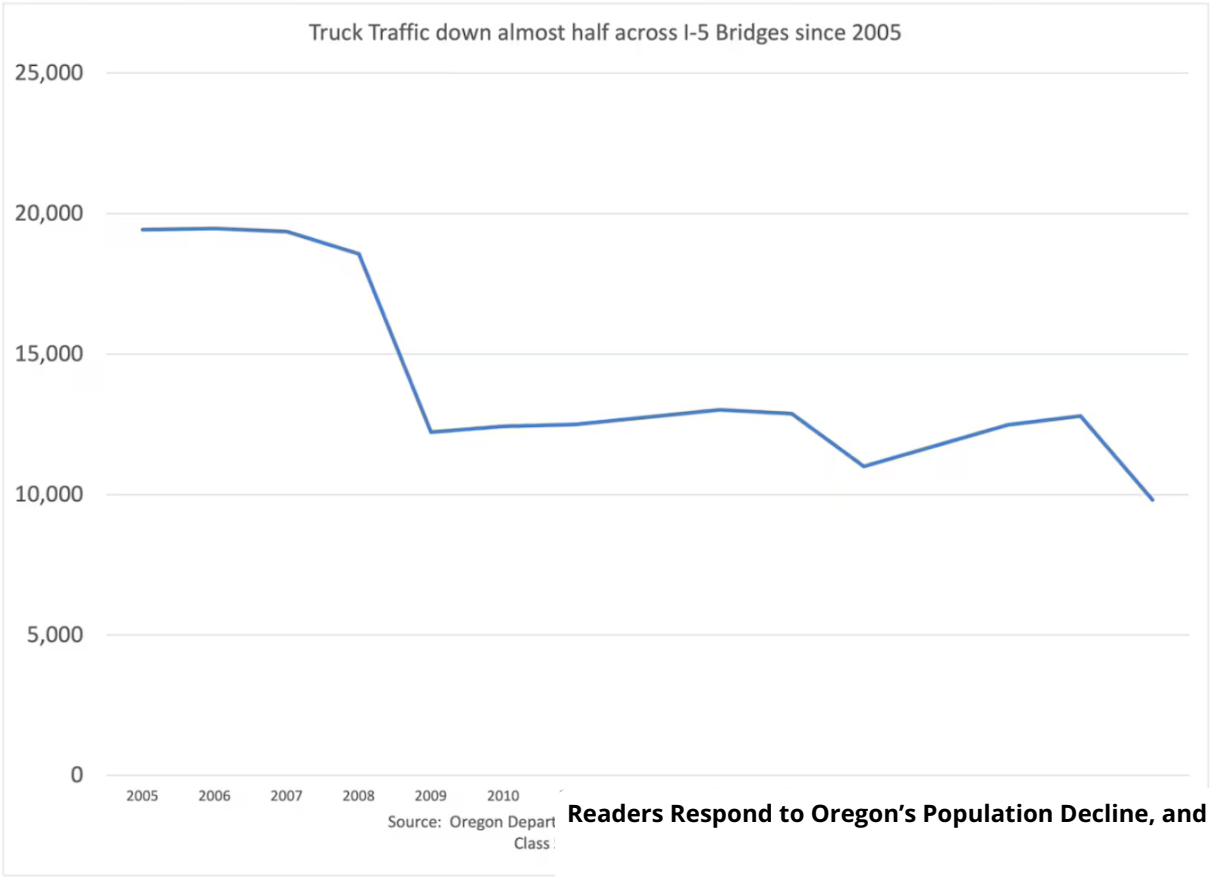

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IBR Draft SEIS - RECORD #2381 DETAIL

First Name :	Waymire
Last Name :	Chris
Attachments :	DSEIS_2381_Chris_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #2381 DETAIL

Submission Date : 11/17/2024
First Name : Waymire
Last Name : Chris
Business/Organization/Agency :

Submission Input :

First Name:
Waymire

Last Name:
Chris

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
I cannot express how wrong this project proposal is. The size of this project, both in dollars and geographic footprint, is to much. Right size this and don't make Hayden Island look like on large freeway interchange.

JCA comment #: 506

IBR Draft SEIS - RECORD #2383 DETAIL

First Name :	Jacob
Last Name :	Hoffman-Andrews
Attachments :	DSEIS_2383_Hoffman-Andrews_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #2383 DETAIL

Submission Date : 11/16/2024
First Name : Jacob
Last Name : Hoffman-Andrews
Business/Organization/Agency :

Submission Input :

First Name:
Jacob

Last Name:
Hoffman-Andrews

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
I rely on bikes and transit as my only means of transportation. I often combine the two in multimodal trips - biking to a transit station, taking transit, and biking to my final destination. When I travel between Portland and Vancouver, I bike. One of the most important things I think about when planning a bike ride is how direct the route is, and how much elevation gain there is. The current design incorporates an unnecessarily long, and mandatory, 1/2 mile loop to descend to the waterfront on the Vancouver side. For people whose final destination is further up the hill, this represents a big loss of elevation - and momentum - that has to be earned back later. That extra climbing can be very discouraging to a bike trip.

Instead, the walking and biking path should be on the same side as the MAX line, so that they can share

infrastructure and access. In particular, the MAX elevators should be usable to access the bike path, and it should be easy to bike directly to the MAX stations. Putting the path and the MAX line on the same side also means that an elevator can be used to access the waterfront, while the path continues at elevation all the way to Evergreen, making for a much more pleasant trip without unnecessary dips..

Putting the path and the MAX line provides another crucial benefit: it provides a buffer so that the path is not directly next to high speed, noisy, stinky traffic. I've biked on the I-205 path a number of times, and the extreme proximity to traffic is a huge disincentive to making the trip. By the time I reach the other end of the bridge I usually have some temporary hearing loss from the traffic noise.

Ideally both the path and the MAX line should be on the East side of the bridge, with the path on the easternmost side. This provides walkers and bikers with beautiful views of Mt. Hood and the Columbia River, and could make the Interstate Bridge a tourist attraction like the Golden Gate Bridge.

JCA comment #: 505

IBR Draft SEIS - RECORD #2384 DETAIL

First Name :	Allyse
Last Name :	Heartwell
Attachments :	DSEIS_2384_Heartwell_Original.pdf (6 kb)

IBR Draft SEIS - RECORD #2384 DETAIL

Submission Date : 11/16/2024
First Name : Allyse
Last Name : Heartwell
Business/Organization/Agency :

Submission Input :

First Name:
Allyse

Last Name:
Heartwell

Email:
[redacted]

US States:
[redacted]

Topic Area:
Transportation

Comment:
I bike from Portland to Vancouver, and it's important to me that the new bridge is safe and practical to use. I'd like the multiuse path to be on the same side of the bridge as the light rail, so people can use the transit elevators to access either the multiuse path or the transit station. I'd like to see the path on the Vancouver side remain elevated as far as the last MAX stop, to avoid bikes having to dip down a half mile ramp to the waterfront if that's not their destination.

JCA comment #: 504

IBR Draft SEIS - RECORD #2385 DETAIL

First Name :	Susan
Last Name :	Rogers
Attachments :	DSEIS_2385_Rogers_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #2385 DETAIL

Submission Date : 11/16/2024
First Name : Susan
Last Name : Rogers
Business/Organization/Agency :

Submission Input :

First Name:
Susan

Last Name:
Rogers

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Hayden Island Issues

Comment:
I live on Hayden island. I would like more focus on retaining and supporting businesses on Hayden island. More free spaces, less concrete.

JCA comment #: 503

IBR Draft SEIS - RECORD #2386 DETAIL

First Name :	sher
Last Name :	shepps
Attachments :	DSEIS_2386_Shepps_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #2386 DETAIL

Submission Date : 11/16/2024
First Name : sher
Last Name : shepps
Business/Organization/Agency :

Submission Input :

First Name:
sher

Last Name:
shepps

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
The present design if much larger than it needs to be - which will only add more cars. We need to be moving toward more rapid transit. Additionally tolling needs to occur with reduced rates for residents of Hayden Island.

JCA comment #: 502

IBR Draft SEIS - RECORD #2387 DETAIL

First Name :	Jeff
Last Name :	Rey
Attachments :	CommentsonCorkScrewRamps_JR_Resized.pdf (363 kb)

Comments on the separation of the Multiuse Path Cork Screw Ramps and Light Rail Stations Stair and Elevators

The IBR proposes building the light rail line on the south bound main bridge. The Vancouver shoreline light Rail Station is approximately 100' in elevation above the ground and is access through stairs and elevators.

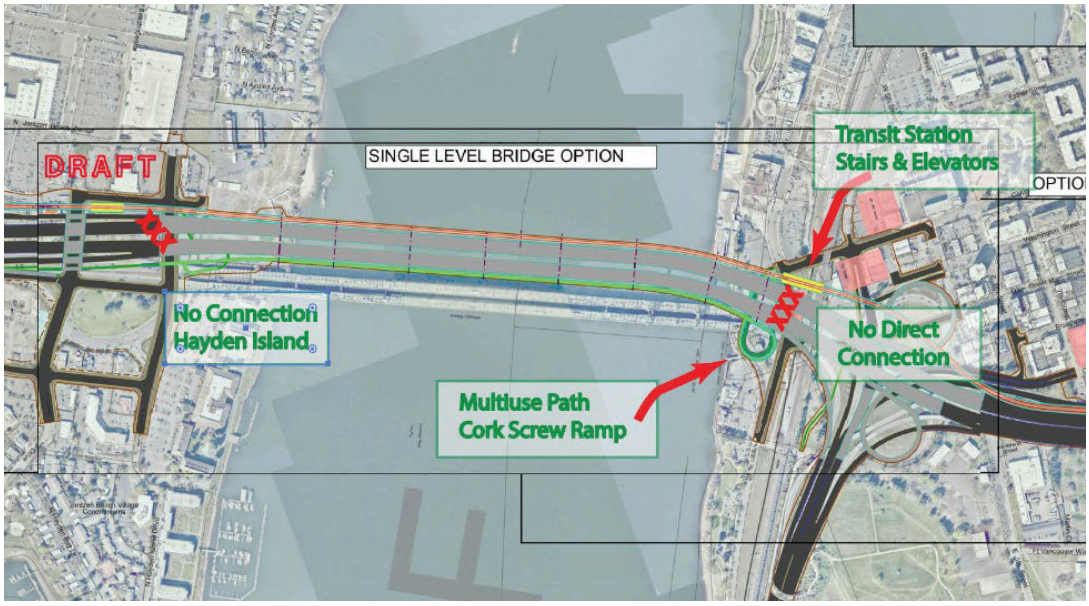
The multiuse path is built on the north bound main bridge span. The end point of the multiuse path on the Vancouver shoreline is approximately 100' in elevation above the ground and is access by a cork screw ramp of approx. ½ mile in length.

Though the Vancouver shoreline Light Rail Station and the end point of the Multiuse Trail are adjacent to each other and are both 100' in elevation above the ground, the access systems for each are entirely separate from each other. The stairs and elevators for transit users are not usable for users of the multiuse path. The ramp connection for multiuse path users that are not usable for transit riders.

The Hayden Island light rail station and Oregon side of the main bridge multiuse path has the same disconnection, though the elevation is less at about 35' above ground.

People who are not driving to their destination, a goal of the IBR, will often use several modes to reach their destination. Users may ride their bikes to a light rail station, place their bikes on the train in storage specially design for bikes on the light rail train, then ride their bikes for the final leg of their trip. The IBR design of entirely separate light rail and multiuse path access makes these blended trips difficult.

We believe additional study is needed to connect these two systems together.



Thank you
Jeff Reynoldson

IBR Draft SEIS - RECORD #2388 DETAIL

First Name :	Jeff
Last Name :	Rey
Attachments :	DSEIS-2388_Rey_Original.pdf (166 kb)

IBR Draft SEIS - RECORD #2388 DETAIL

Submission Date :	11/16/2024
First Name :	Jeff
Last Name :	Rey
Business/Organization/Agency :	
Attachments :	Comments-Bridge-Architecture JR.pdf (170 kb)

Submission Input :

Draft SEIS public comment

Jeff Reynoldson

[redacted]

[redacted]

Comments on the Importance of the Architectural Design of the new Bridges.

Once the project decides whether the main bridges are going to be a single level bridges, stack style bridges or lift style bridges, the IBR project will develop the aesthetic characteristics of the final Bridges.

We request that once the bridge configuration is determined the IBR will hold a public process on the final architectural design of not only the main bridges but the entire bridge corridor. This process could be modeled after similar processes that Portland has done in the past for Tilikum Crossing and the new Burnside Bridge. Both of these processes were led by National Design Experts in collaboration with Local Design Experts, the project engineers and members of the public to recommend a final bridge architecture to the region's leaders.

We believe the aesthetics of these bridges matter, and that they are an important inspiration that helps move the project forward. The architectural style of the bridges creates a gateway to both Oregon and Washington. The view of the bridges from the Vancouver shoreline and Hayden Island are important to the future developments in those areas.

Should the IBR select the stack bridges as the best option, that bridge structure, even though it is a basic truss, can be executed with finesse. Remember the bridges crossing North Portland Harbor could have architectural significance as well. Imagine driving over the Harbor between twin cable-stayed bridges on each side, one beautiful structure holding up the light rail bridge, and its twin holding up the local Harbor bridge.

Even a flat bridge can have architectural significance. How the constraints of the project are resolved in the hands of a talented Bridge Architect become the Bridge's unique beauty.

The region is investing a lot into these bridges that will be part of our environment for a long time. Let's build something we are proud to leave to our children and our children's children.

Thank you
Jeff Reynoldson

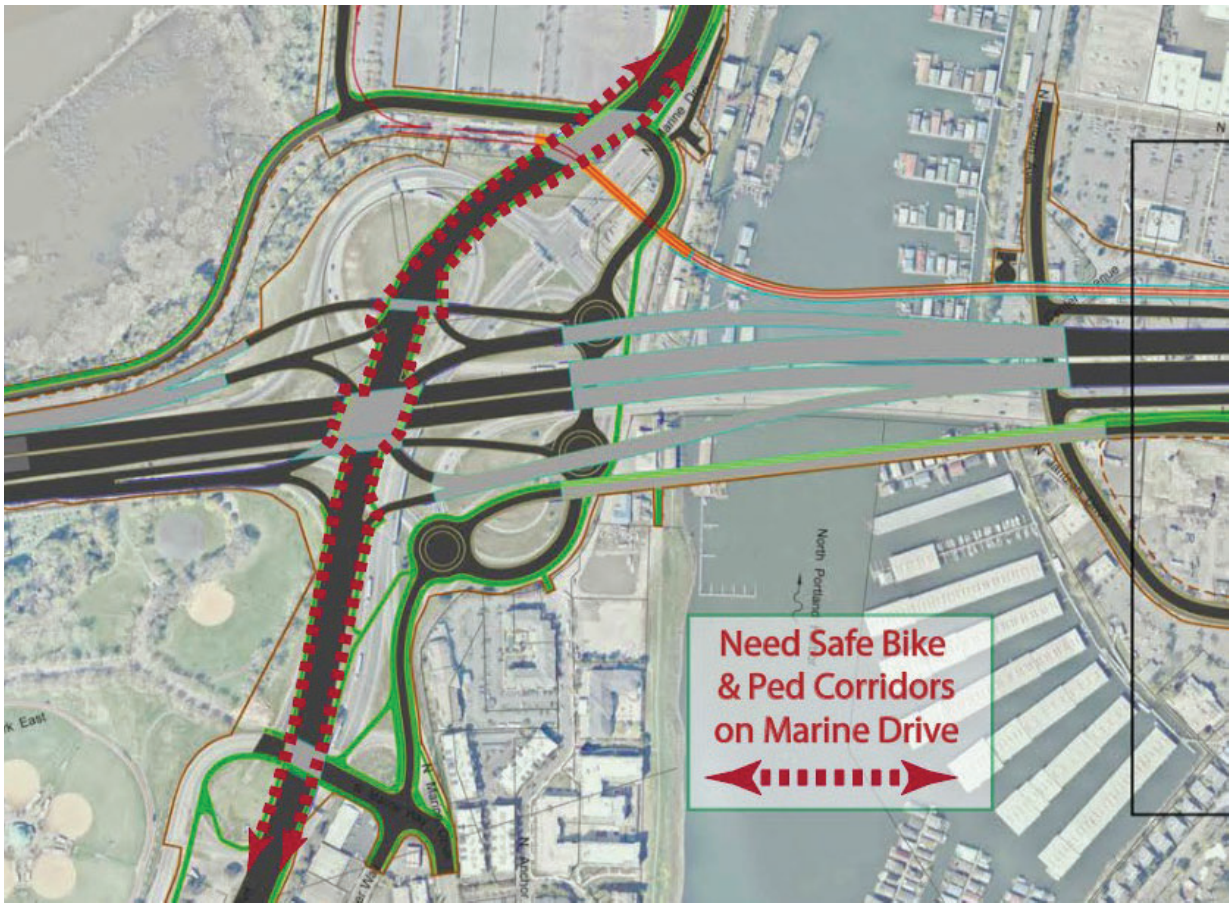
IBR Draft SEIS - RECORD #2389 DETAIL

First Name :	Jeff
Last Name :	Rey
Attachments :	130937_MarineDriveBikeLanes_JR_Resize.pdf (364 kb) MarineDriveBikeLanes_JR.pdf (268 kb)

Comments on Freight and Bike conflicts on the Marine Drive Single Point Interchange

The IBR proposed design for Bike lanes through the Marine Drive Single Point Interchange presents a major conflict between bike and Freight movements. As the Marine Drive interchange is considered to be one of the most important Freight Interchanges in the State of Oregon, we request that these pathways for active transportation be built separated from Freight movements to provide safe passage for active transportartion users.

This meets the purpose and needs of the IBR to (b) improve connectivity, reliability, travel times, and operations of public transportation modal alternatives in the Program area and(c) improve highway freight mobility and address interstate travel and commerce needs in the Program area.



Please study how these corridors could be built separated from the vehicle travel lanes using barriers or raised active transportation path ways. In addition, the IBR should study how to use the new technologies of sensors that detect active transportation user approaching intersections crossings. These advanced sensors triggers traffic signals, so that users crossing through many these intersections does not have to individually press a button at each crossing and wait for the signal to change one crossing at a time.

Thank you
Jeff Reynoldson

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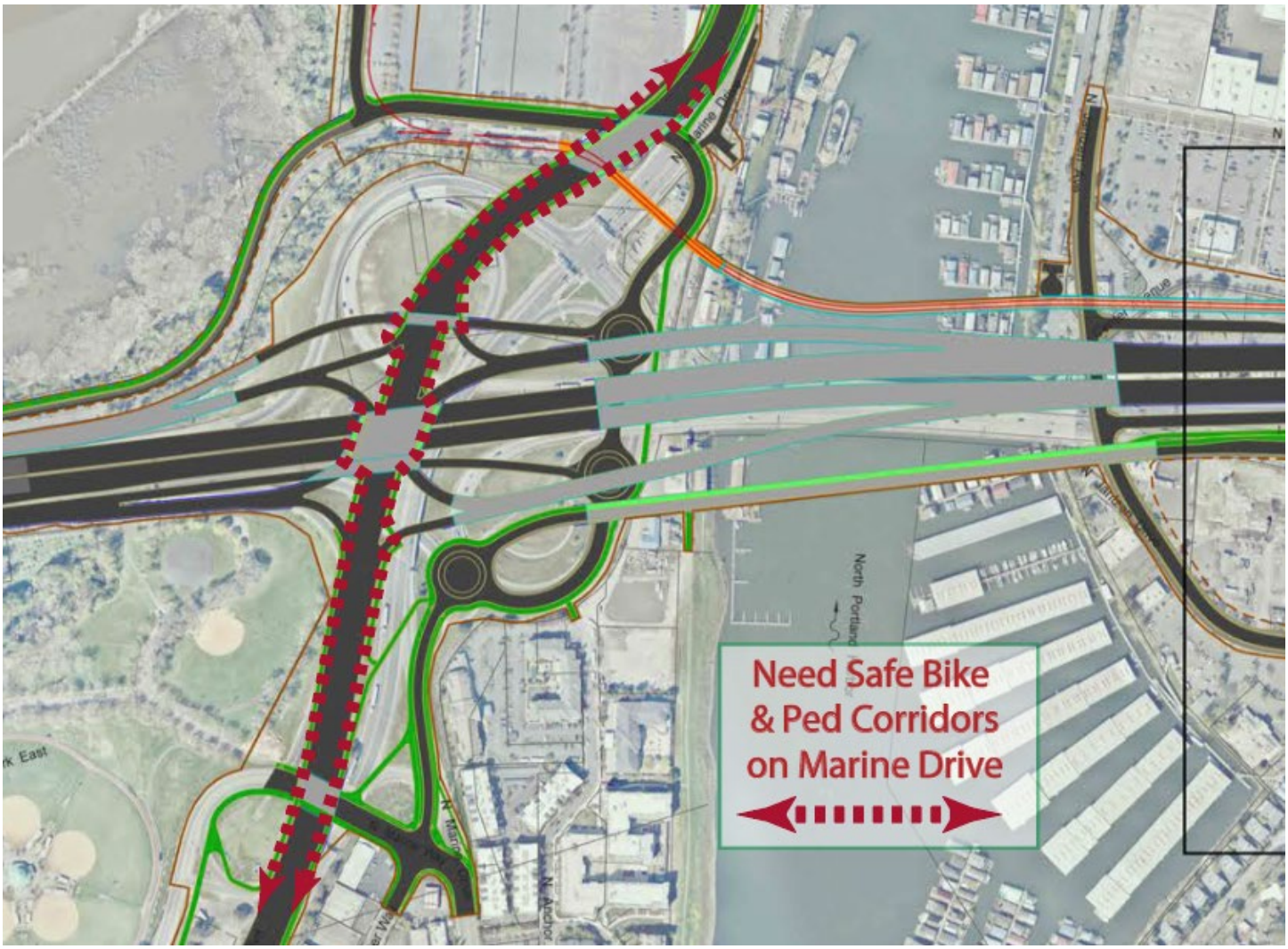
This meets the purpose and needs of the IBR to (b) improve connectivity, reliability, travel times, and operations of public transportation modal alternatives in the Program area and(c) improve highway freight mobility and address interstate travel and commerce needs in the Program area.



Please study how these corridors could be built separated from the vehicle travel lanes using barriers or raised active transportation path ways. In addition, the IBR should study how to use the new technologies of sensors that detect active transportation user approaching intersections crossings. These advanced sensors triggers traffic signals, so that users crossing through many these intersections does not have to individually press a button at each crossing and wait for the signal to change one crossing at a time.

Thank you
Jeff Reynoldson

IBR Draft SEIS - RECORD #2390 DETAIL

First Name :	Jeff
Last Name :	Rey
Attachments :	DSEIS-2390_Rey_Original.pdf (447 kb)

IBR Draft SEIS - RECORD #2390 DETAIL

Submission Date :	11/16/2024
First Name :	Jeff
Last Name :	Rey
Business/Organization/Agency :	
Attachments :	MLK-Undercrossing JR.pdf (450 kb)

Submission Input :

Draft SEIS public comment

Jeff Reynoldson

[redacted]

[redacted]

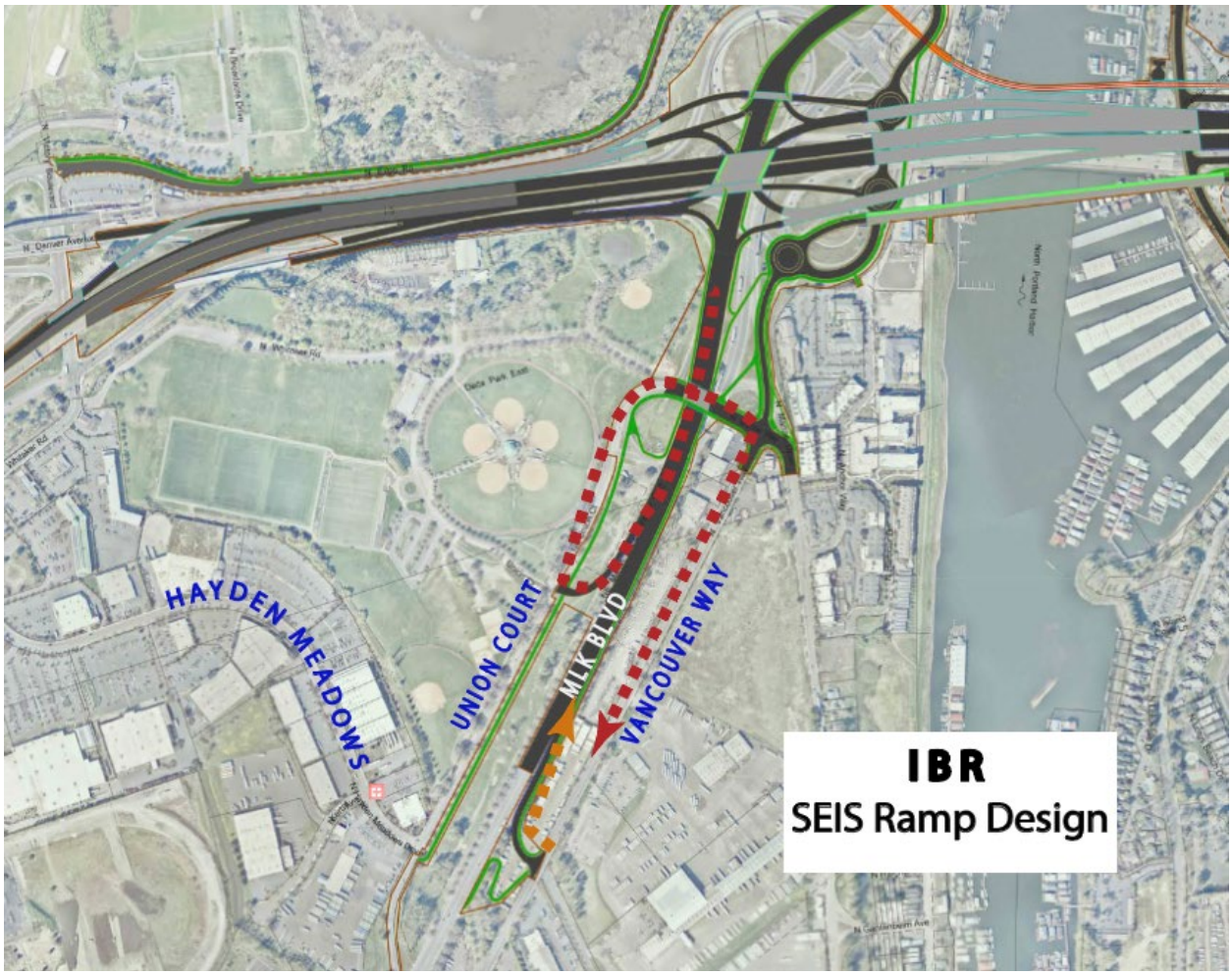
The MLK Undercrossing and Complete Interchange
Better Freight & Neighborhood Access Ramps for the IBR

Initial Proposed Design for MLK Access Ramps.

The Interstate Bridge Replacement (IBR) proposes a Martin Luther King (MLK) on-ramp and off-ramp design that meets very minimal requirements:

1) These ramps replace the existing ramp connections.
2) These ramps merge vehicles onto MLK further away from the Marine Drive single point intersection improving the merge/weave problems with the current intersection.

But this minimal ramp design does not excel with other important goals for Portland including efficient regional freight movement, recreational park safety and understandable way finding.



Problems with the proposed MLK ramp design

1) The proposed ramp design creates out of direction travel.
2) The proposed design is confusing to navigate. A traveler will take the off-ramp to leave the Marine Drive / MLK interchange, but not clearly see how to get back onto the Marine Drive / MLK interchange. There is the same way finding confusion in reverse

3) The proposed MLK off-ramp conflicts with Delta Park's primary recreational entrance. Since this a major Freight travel ramp, this ramp should not conflict with the major access to a major recreational area.
4) The proposed MLK ramp encourages Freight movement to use East Marine Drive for access when the Freight Master plan wants freight travel to use Columbia Blvd to MLK for Freight Access rather than East Marine Drive which is a local neighborhood roadway.

Proposal - MLK Undercrossing and Complete Intersection

There is a better design to meet all of IBR requirements while also meeting broader Portland Freight, Neighborhood and Parks planning goals.

This new ramp design proposes an undercrossing under MLK connecting Hayden Meadows Drive to Vancouver Way. This new MLK undercrossing combined with slightly relocated MLK on-ramps and off-ramps has the following advantages:

1) The Complete MLK Intersection minimizes out of direction travel.
2) The complete MLK intersection removes Freight users from the main Delta Park Entrance.
3) This design would be easier to navigate. It is more understandable for Freight and other users just how to get on and off MLK and the access the Marine Drive Interchange.

4) The new undercrossing meets the purpose and need of the IBR : (a) improve travel safety and traffic operations on the I-5 river crossing **and associated interchanges**; (c) **improve highway freight mobility** and address interstate travel and commerce needs in the Program. The MLK Undercrossing designs meets the purpose and needs better than the minimal IBR ramp design.
5) Lastly the MLK undercrossing provides a new way to access the Hayden Meadows Drive commercial shopping area. This new access could help off-set the removal of the direct access to Hayden Meadows that exist today from the current Marine Drive intersection to I-5 South to Interstate Ave off ramp. This existing off ramp connection from Marine Drive south bound on-ramp to Interstate Ave was removed to provide for the new Braided Ramp from Marine Drive to I-5. This Interstate Ave ramp connection from I-5 still exits if someone is on the main line of I-5. However Marine Drive travelers on the local Portland system wanting to access Interstate Ave in the IBR proposed design would have to travel through the three new Marine Drive traffic circles, then to Expo Road then connect to Interstate Ave. The MLK undercrossing design would create another more direct way to get to Hayden Meadows Drive and Interstate Ave.

IBR's Response to building the MLK Undercrossing

Have Portland Fund This – Not the IBR
This undercrossing has been proposed to the IBR early in the design process. IBR has stated that a MLK undercrossing might be nice to have but that the undercrossing should be something that City of Portland funds later.

A complete MLK Undercrossing and ramp design is more appropriate to be included in the IBR funding package. This undercrossing improves Freight connections for this intersection described as Oregon's Most Important Freight Interchange. The MLK Undercrossing excels at meeting the IBR purpose and need (c) **improve highway freight mobility**.

Rather than the IBR build a minimally acceptable ramp design and suggest the local city come back later and rebuild the preferred connection is not good public policy. The cost of the undercrossing would be an exceptionally large funding request for Portland. The Undercrossing is more appropriate to be funded in the budget for a project that describes itself as building a bridge to meet the needs for the next 100 years.

Please study the MLK undercrossing and full interchange design.
Involve the Freight Community, the local residents, Portland Transportation and Portland Parks.
Let's work together to refine a ramp and undercrossing design that excels at meeting section C of the purpose and need of the IBR to improve freight mobility.

Thank you
Jeff Reynoldson

IBR Draft SEIS - RECORD #2391 DETAIL

First Name :	Jeff
Last Name :	Rey
Attachments :	DSEIS-2391_Rey_Original.pdf (496 kb)

IBR Draft SEIS - RECORD #2391 DETAIL

Submission Date :	11/16/2024
First Name :	Jeff
Last Name :	Rey
Business/Organization/Agency :	
Attachments :	Separating-Freight-Bike-Travel JR.pdf (500 kb)

Submission Input :

Draft SEIS public comment

Jeff Reynoldson

[redacted]

[redacted]

Separating Freight and Bike Travel
on the Marine Drive Interchange and On-Ramps

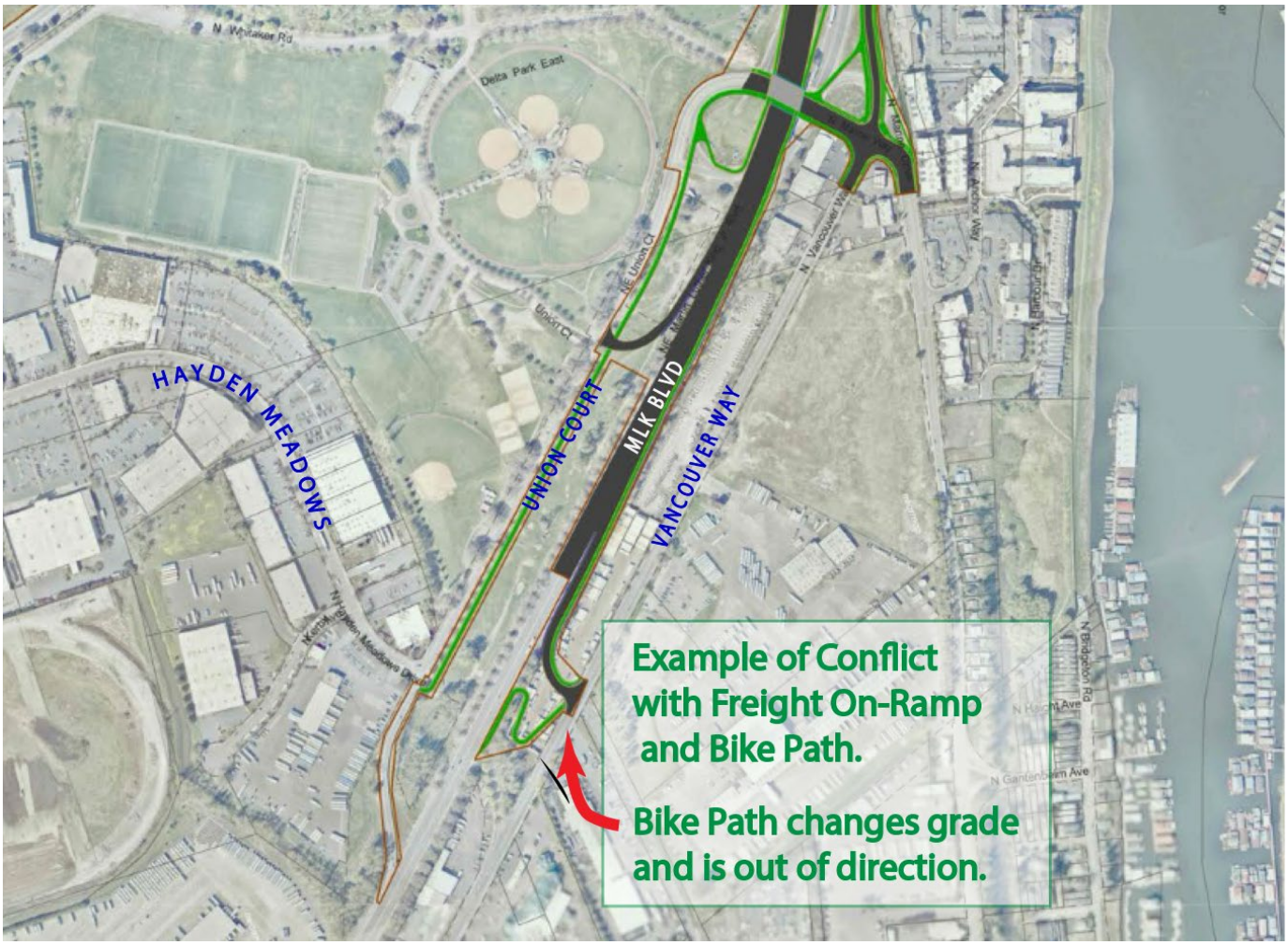
One important purpose and need of the IBR is to (c)improve highway freight mobility and address interstate travel and commerce needs in the Program area.

Another important purpose and need is to (b) improve connectivity, reliability, travel times, and operations of public transportation modal alternatives in the Program area.

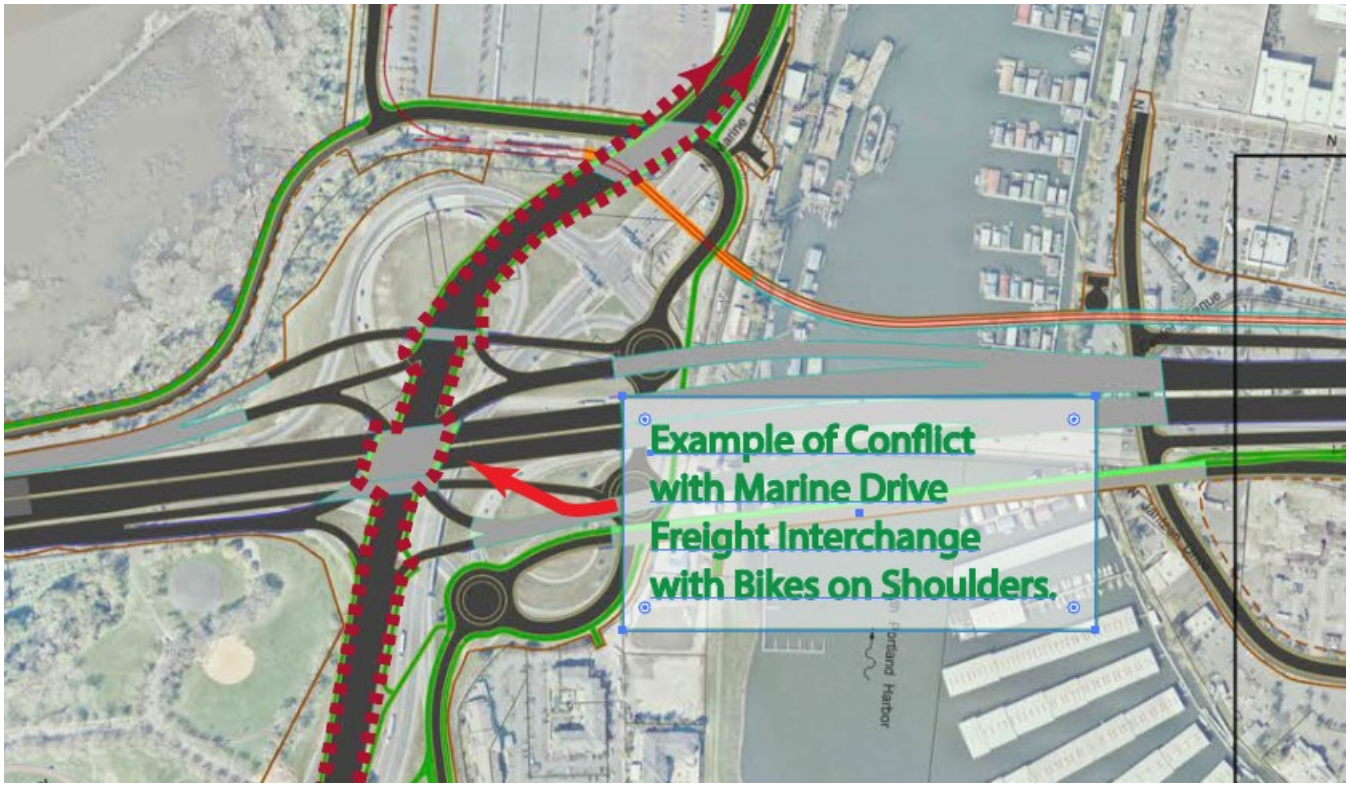
A way to meet the purpose and needs of both Freight Users and Active Transportation Users is to build active transportation routes physically separated from Freight routes as much as possible. Maximizing this separation is key to creating efficient Freight routes while creating safer, more attractive, and therefore more heavily used walking, rolling, and biking routes.

Examples of Conflicts between Freight and Active Transportation users.

The proposed IBR design for the ramp from Vancouver Way to MLK North poses significant conflict between Freight and Bikes, as the proposed Bike route travels changes grade along a switch back, crosses a major Freight intersection and climbs a grade up along a freight-heavy on-ramp.



Another example of possible Freight-Bike conflict is in the Marine Drive Interchange. Here IBR proposes to build a complete bike lanes and pedestrian sidewalk on both sides of the Interchange.



Even if the IBR is required by State Law to provide bike and pedestrian facilities on the Marine Drive interchange, we recommend additional study on improving two aspects of these improvements:

1) Any facilities for bike and ped that must be built on Marine Drive needs to be built in a way that separates bike and ped travel from Freight as much as possible using techniques such as barriers, and raised bike roadways.

2) To discourage any active transportation users from crossing the Marine Drive interchange, also build alternative routes that go around the Marine Drive Interchange rather than through the interchange. This separate bike ped system needs be so well design that it becomes the preferred route. Current IBR design has the MLK active user connection provided partially along MLK shoulders and partially on separated trails. To become the preferred route, an active transportation route that is not reliant of MLK shoulders need to be developed. This separated preferred corridor needs to conveniently link to each of the existing regional bike corridors.

Complete separation creates safety for both the people that are walking, biking and rolling in this area, but also makes it safer and more efficient for Freight Users who don't have to worry about negotiating on ramps with curves and with grade changes while watching out for bike users traveling the exact same routes.

This separation better meets 3 parts of the purpose and needs statement of the IBR; (a) improve travel safety and traffic operations on the I-5 river crossing and associated interchanges; (b) improve connectivity, reliability,

travel times, and operations of public transportation modal alternatives in the Program area; (c) improve highway freight mobility and address interstate travel and commerce needs in the Program area.

Given the Marine Drive interchange is usually described as the **most heavily used Freight corridor in Oregon**, we encourage the IBR to work with the Active Transportation Users in combination with the Freight Users **together rather than separately** to refine designs that efficiently moves Freight Users through the Marine Drive Interchange and Active Transportation Users around the Interchange.

Thank you
Jeff Reynoldson

IBR Draft SEIS - RECORD #2392 DETAIL

First Name :	Jeff
Last Name :	Rey
Attachments :	DSEIS-2392_Rey_Original.pdf (214 kb)

IBR Draft SEIS - RECORD #2392 DETAIL

Submission Date :	11/16/2024
First Name :	Jeff
Last Name :	Rey
Business/Organization/Agency :	
Attachments :	Synergies-Empowered-by-the-IBR JR.pdf (214 kb)

Submission Input :

Draft SEIS public comment

Jeff Reynoldson

[redacted]

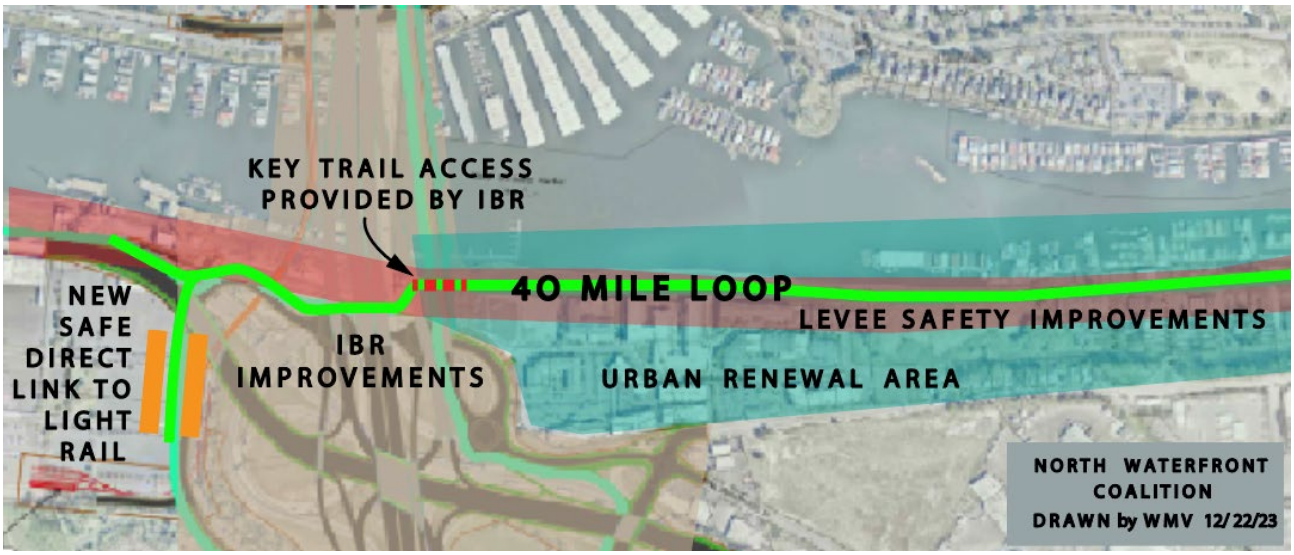
Synergies Empowered by the IBR

Coordinate synergies between improvements by the IBR and other large public and private projects being constructed at the same time. This synergy coordinated by the Cities of Portland and Vancouver could create public amenities greater than any of the individual projects could provide on their own.

Example: **Create Bridgeton Trail Segment of the 40 Mile Loop**

1) IBR Road system requires acquisition of property in order to build the new Harbor Bridges. That property under the new bridges finally puts into public ownership a key missing trail segment of the 40 Mile Loop.
2) At the same time as the IBR, the Army Corp of Engineers is upgrading the adjacent levee. The improved levee will be higher in elevation and finished with a compacted gravel maintenance road.
3) That key trail segment is also located in an existing Portland urban renewal district. The urban renewal district has already designed the finished trail, amenities and connections to local walkways. The urban renewal district had set aside funds to do the finish work once the trail easements were acquired.
4) By completing this Trail segment, Hundreds of residential units in Bridgeton have a direct, protected and safe way to walk and roll to the Expo Light Rail Station. This enhances ridership numbers for the IBR Light Rail and FTA funding requests.

The City of Portland can coordinate these projects together. Work IBR is already planning to do can create a synergy that builds a key piece of Trail infrastructure greater than any one project could do on their own.



This is just one example of possible synergies empowered through the IBR.
There are other synergies for Hayden Island, Vancouver Waterfront and Historic Reserve.

Thank You
Jeff Reynoldson

IBR Draft SEIS - RECORD #2393 DETAIL

First Name :	Jeff
Last Name :	Rey
Attachments :	DSEIS-2393_Rey_Original.pdf (563 kb)

IBR Draft SEIS - RECORD #2393 DETAIL

Submission Date :	11/16/2024
First Name :	Jeff
Last Name :	Rey
Business/Organization/Agency :	
Attachments :	The-40-Mile-Loop-Connections JR.pdf (561 kb)

Submission Input :

Draft SEIS public comment

Jeff Reynoldson

[redacted]

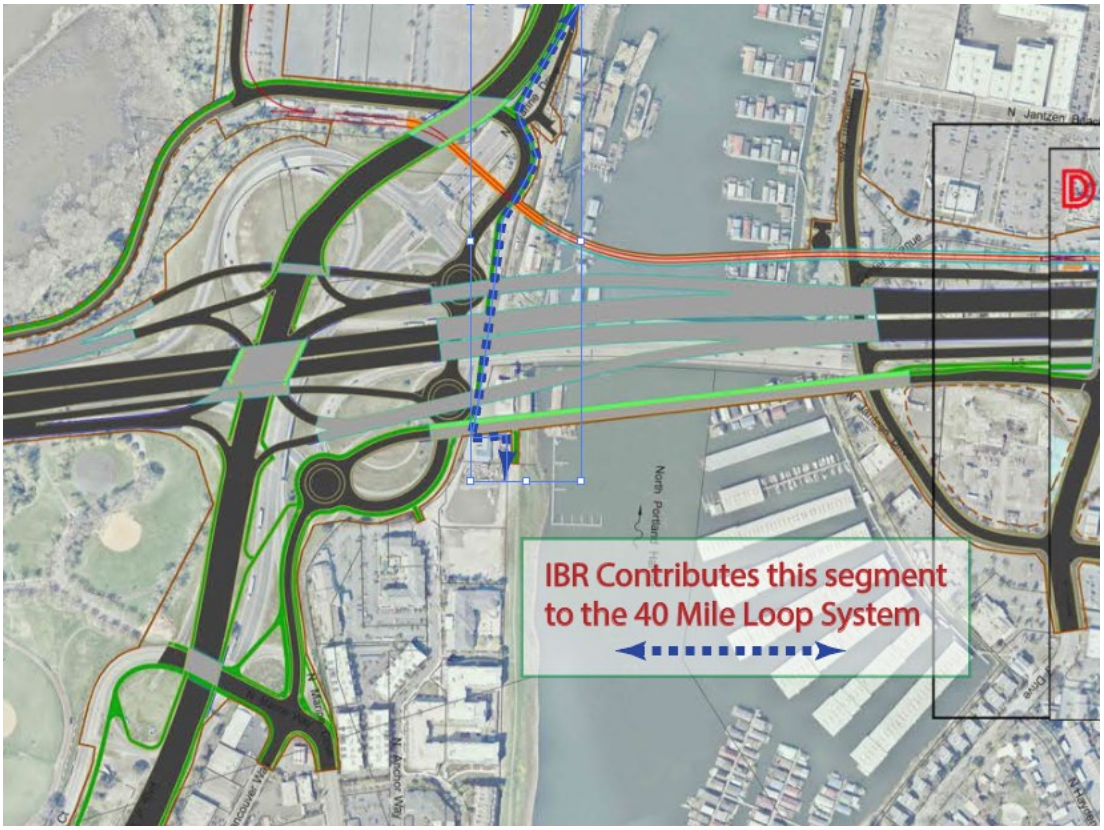
Comments on IBR Multi-Use path connections
to the 40-Mile Loop East/West Corridor

The 40-Mile Loop is a comprehensive regional trail system forming a central Hub that connects nearly all other regional trails and parks within Multnomah County. The Loop alignment has been planned and incorporated into regional land use frameworks for over 40 years. While the trail alignment for the 40-Mile Loop has long been established, certain easements remain unacquired, and some portions of the trail are yet to be constructed.

The adopted alignment of the 40-Mile Loop passes through the area impacted by the Interstate Bridge Replacement (IBR) project. While the IBR project provides several benefits to the 40-Mile Loop, we believe additional study is warranted to make the proposed trails safer and more usable.

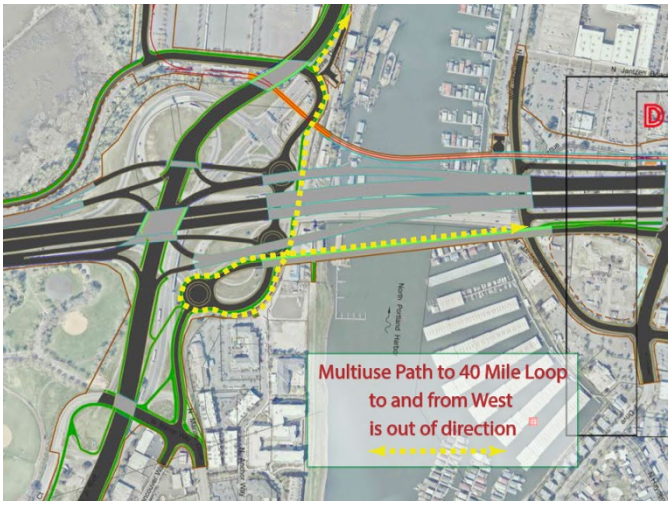
IBR Positive Contributions to the 40-Mile Loop Trail

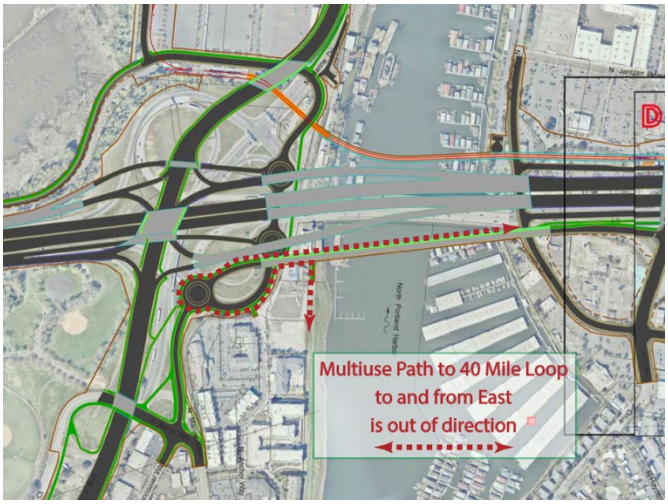
The IBR project will construct the segment of the 40-Mile Loop within the project area. This new trail segment will provide a safe, separated trail connecting the existing 40-Mile Loop trail located west of the proposed bridges through the project area, under the many new IBR bridges emanating from mainland Portland. After crossing under the local Harbor Bridge, the east most bridge proposed, the IBR will stub out the Trail to the East for a future connection to the Bridgeton Trails segment of the 40 Mile Loop. This is a good trail addition to the 40 Mile Loop and appreciated by the 40 Mile Loop Land Trust board.



Concerns with the Proposed Connection of 40 Mile Loop to the multiuse path on the local Harbor Bridge.

However, the proposed trail connections from the multiuse path on the local Harbor Bridge to the new 40-Mile Loop segment is not optimal. The proposed design requires users to travel out of their way, navigating a traffic circle and crossing vehicle lanes to reach both the eastbound and the westbound trail connection. This routing is neither convenient nor efficient and could discourage its use.





Request for Further Study of better East and West Connections to the 40 Mile Loop

We strongly recommend that alternative design options be considered to provide a more direct, connection to and from the east and west to the local Harbor Bridge multiuse path.

Possible additional study include:

1) Creating a direct connection from the East stub of the Bridgeton Trail to the sidewalk on the east side of the local Harbor Bridge. This direct connection would make it easier and more appealing for cyclists and pedestrians to cross the Harbor Bridge, while also offering a scenic route with views of North Portland Harbor and Mt Hood.
2) Additionally, we request that the sidewalk on the east side of the local Harbor Bridge be designed to be as wide as possible, with areas to rest and enjoy the views, further enhancing the experience for users.
3) Study more direct trail connections from the local Harbor Bridge multi use path to both the east and the west that do not involve routes around the Marine Drive traffic circles and crossing travel lanes.
4) Study routing the IBR entire multiuse path on the west side of the bridges rather than the east side. If the multiuse path was located on the light rail bridge on the west side, the east and west connection would be straight forward and direct. The west side multi use path is discussed more in a separate comment.
5) Lastly, we have a separate comment on ways the IBR could facilitate more just a stub for the east side connection to the Bridgeton Trail segment of the 40 Mile Loop.

Thank you
Jeff Reynoldson

IBR Draft SEIS - RECORD #2394 DETAIL

First Name :	Jeff
Last Name :	Reynoldson
Attachments :	DSEIS-2394_Rey_Original.pdf (245 kb)

IBR Draft SEIS - RECORD #2394 DETAIL

Submission Date :	11/16/2024
First Name :	Jeff
Last Name :	Rey
Business/Organization/Agency :	
Attachments :	The-Vancouver-Dip JR.pdf (244 kb)

Submission Input :

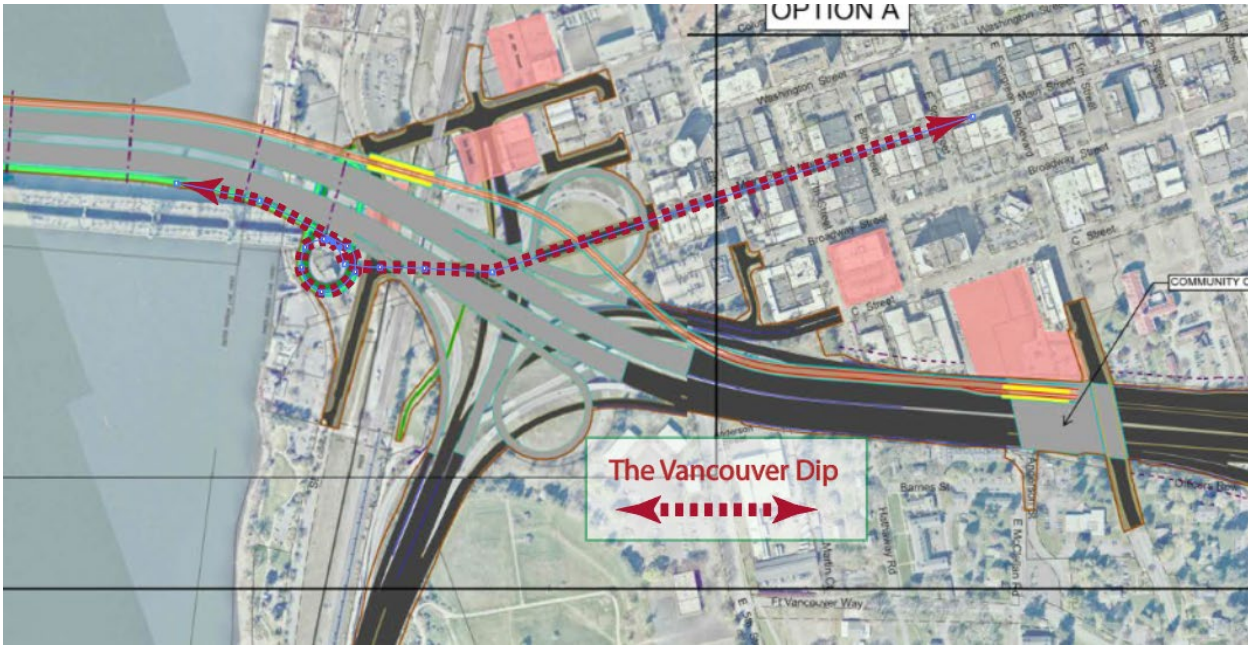
See attached comments to the Draft SEIS public comment

Jeff Reynoldson

Comments on the out of direction way active transportation users connect to the Multi-Use Path on the Vancouver shoreline.
The Vancouver Dip.

If you are traveling by active transportation from central Vancouver, you must first travel down grade to the Vancouver shoreline, then travel up the long spiral ramp to connect to the main bridge multi use path. We call this the Vancouver Dip.

This is a significant barrier that will discourage use of active transportation due to the extra effort needed to travel down grade from central Vancouver to the shoreline, then up a long ramp to go south on the multiuse path. Northbound travel by active transportation user would experience the same Vancouver Dip in reverse.



The Vancouver Dip does not meet the IBR purpose and need to; (b) improve connectivity, reliability, travel times, and operations of public transportation modal alternatives in the Program area.

To better meet the purpose and need, additional study is needed to see if the multiuse path could be extended to the next light rail station which is proposed to be a transit hub for Vancouver. This transit hub brings together the new light rail line extension and several BRT lines together. Adding a direct connection to the multiuse path at this transit hub would encourage active users and facilitate active transportation users using both transit and biking efficiently for their complete non-auto trip. This would eliminate the Vancouver Dip.

One idea that needs additional study that would alleviate the disconnection between transit and active transportation users is to place the multi-use path and the transit line next to each other on the west side of the southbound main bridge. This idea of the west side multiuse path will be discussed more in a separate comment.

Thank you
Jeff Reynoldson

IBR Draft SEIS - RECORD #2395 DETAIL

First Name :	Jeff
Last Name :	Rey
Attachments :	DSEIS-2395_Rey_Original.pdf (332 kb)

IBR Draft SEIS - RECORD #2395 DETAIL

Submission Date :	11/16/2024
First Name :	Jeff
Last Name :	Rey
Business/Organization/Agency :	
Attachments :	West-Side-Mulituse-Path JR.pdf (331 kb)

Submission Input :

See attached comments to the Draft SEIS public comment

Jeff Reynoldson

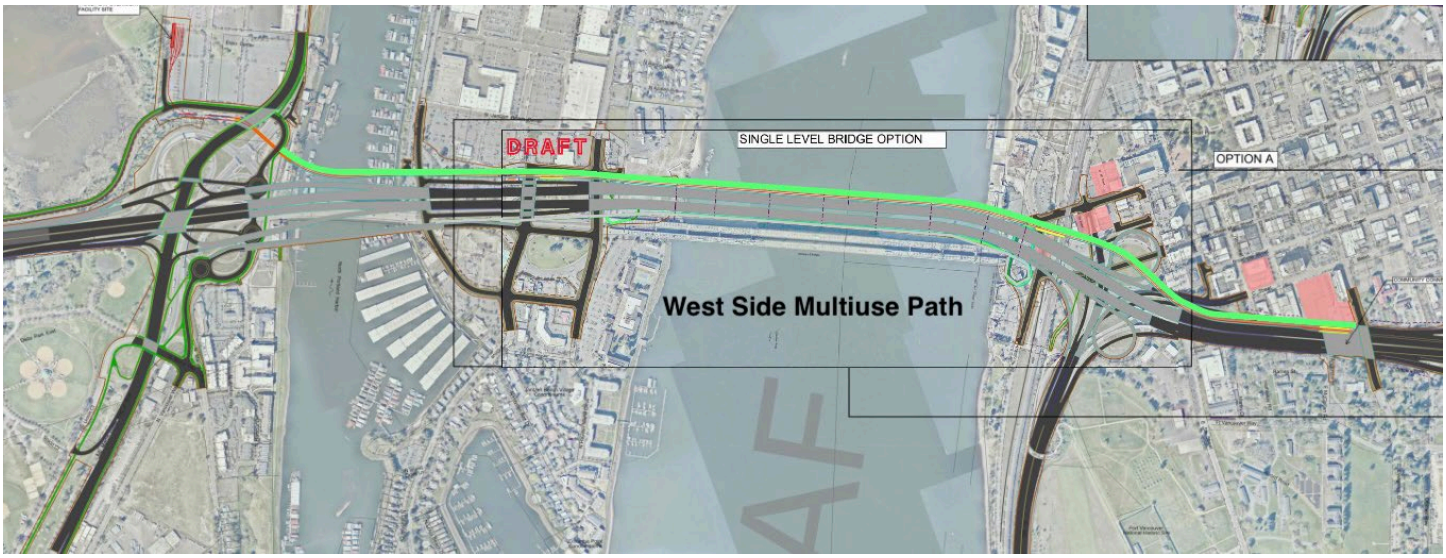
[redacted]

Comments on Studying building both the multi-use path and the light rail line on the west side of the south bound main bridge

The IBR proposes building the light rail line on the south bound main bridge and the multiuse path on the north bound main bridge span. The IBR proposal makes each system separate from each other. The IBR proposal makes connections between these two systems difficult and inefficient for transit and active transportation users.

The IBR proposal has stairs and elevators providing connections for transit users but the stairs and elevators are not usable for users of the multi-use path. The multi-use path has ramp connections for users that are not usable for transit riders. Though these two systems are parallel to each other, but they are entirely separated systems. These systems do not connect easily even though active transportation users want to connect to transit.

We believe additional study is needed to connect these two systems together. People who are not driving to their destination, a goal of the IBR, will often use several modes to reach their destination. Users may ride their bikes to a light rail station, place their bikes on the train in storage specially design for bikes on the light rail train, then ride their bikes for the final leg of their trip. The IBR design of entirely separate light rail and multiuse path makes these blended trips difficult.



One idea that needs to be studied more is to build the multiuse path next to the light rail alignment on the south bound main bridge. Compared to the multiuse path on the east side of the main bridge, the multiuse path on the west side next to the light rail alignment better meets the purpose and needs statement for the IBR to (b) improve connectivity, reliability, travel times, and operations of public transportation modal alternatives in the Program area. The west side alignment provides the following improvements:

• Seamless Transition: Users should easily switch between transit and active transportation at any station, with no grade changes or distance barriers.

• Shared Elevator Access: Allowing active transportation users to share transit station elevators eliminates the need for additional infrastructure, making the design more efficient and accessible.

• Creates reductant ways to connect to both transit and multiuse path: If the elevator is not working, users can use the ramp or stairs. User not able to negotiate going up the long ramps can use the elevator. Bike users who get a flat tire on the multiuse path can connect to the light rail station and still get to their destination.

• Provides Eyes on the Path: Transit operators and passengers provide a continuous presence, reducing the isolation felt on a multi-use path and enhancing safety and comfort.

• Better Emergency Egress: The multi-use path should double as an emergency exit route for the transit way, supporting user safety during unexpected events.

• Inclusive Design Principles: These principles ensure the accessibility and usability of both transit and active transportation facilities for individuals of all abilities.

• By building the multiuse path on the west side of the light rail trackway provides greater separation from vehicle noise and would offer a more pleasant experience for active transportation users compared to a multiuse path on the east side immediately next to vehicle travel.

• If the multiuse path was built next to the light rail line on the light rail bridge crossing North Portland Harbor, then the multiuse path connection to the 40 Mile loops would be direct rather than out of direction when the multiuse path is on the local Harbor Bridge.

Regarding Views: There is a good view of Mt Hood if the multiuse path in on the east side of the north bound main bridge, however there is a good view to the west too. Additionally, a quality view of North Portland Harbor and Mt Hood views could be experienced on the local harbor bridge, but the IBR proposes the multiuse path on the west side of that local Harbor Bridge. The IBR also shows a side walk on the east side of the local Harbor Bridge. We propose that the side walk on the east side of the Local Harbor Bridge be as wide as possible and include wide spots for stopping on the route to rest and appreciate one of the region's best view of North Portland Harbor.

View East from Local Harbor Bridge

Thank you,
Jeff Reynoldson

IBR Draft SEIS - RECORD #2396 DETAIL

First Name :	Laura
Last Name :	Lou
Attachments :	DSEIS-2396_Lou_Original.pdf (171 kb)

IBR Draft SEIS - RECORD #2396 DETAIL

Submission Date :	11/16/2024
First Name :	Laura
Last Name :	Lou
Business/Organization/Agency :	
Attachments :	Comments-Bridge-ArchitectureLR.pdf (170 kb)

Submission Input :

Draft SEIS public comment

Laura Reynoldson

[redacted]

Comments on the Importance of the Architectural Design of the new Bridges.

Once the project decides whether the main bridges are going to be a single level bridges, stack style bridges or lift style bridges, the IBR project will develop the aesthetic characteristics of the final Bridges.

We request that once the bridge configuration is determined the IBR will hold a public process on the final architectural design of not only the main bridges but the entire bridge corridor. This process could be modeled after similar processes that Portland has done in the past for Tilikum Crossing and the new Burnside Bridge. Both of these processes were led by National Design Experts in collaboration with Local Design Experts, the project engineers and members of the public to recommend a final bridge architecture to the region's leaders.

We believe the aesthetics of these bridges matter, and that they are an important inspiration that helps move the project forward. The architectural style of the bridges creates a gateway to both Oregon and Washington. The view of the bridges from the Vancouver shoreline and Hayden Island are important to the future developments in those areas.

Should the IBR select the stack bridges as the best option, that bridge structure, even though it is a basic truss, can be executed with finesse. Remember the bridges crossing North Portland Harbor could have architectural significance as well. Imagine driving over the Harbor between twin cable-stayed bridges on each side, one beautiful structure holding up the light rail bridge, and its twin holding up the local Harbor bridge.

Even a flat bridge can have architectural significance. How the constraints of the project are resolved in the hands of a talented Bridge Architect become the Bridge's unique beauty.

The region is investing a lot into these bridges that will be part of our environment for a long time. Let's build something we are proud to leave to our children and our children's children.

Thank you
Laura Reynoldson

IBR Draft SEIS - RECORD #2397 DETAIL

First Name :	Laura
Last Name :	Reynoldson
Attachments :	DSEIS-2397_Lou_Original.pdf (260 kb)

IBR Draft SEIS - RECORD #2397 DETAIL

Submission Date :	11/16/2024
First Name :	Laura
Last Name :	Lou
Business/Organization/Agency :	
Attachments :	Comments-on-Cork-Screw-Ramps LR.pdf (259 kb)

Submission Input :

Draft SEIS public comment

Laura Reynoldson

[redacted]

[redacted]

Comments on the separation of the Multiuse Path Cork Screw Ramps and Light Rail Stations Stair and Elevators

The IBR proposes building the light rail line on the south bound main bridge. The Vancouver shoreline light Rail Station is approximately 100' in elevation above the ground and is access through stairs and elevators.

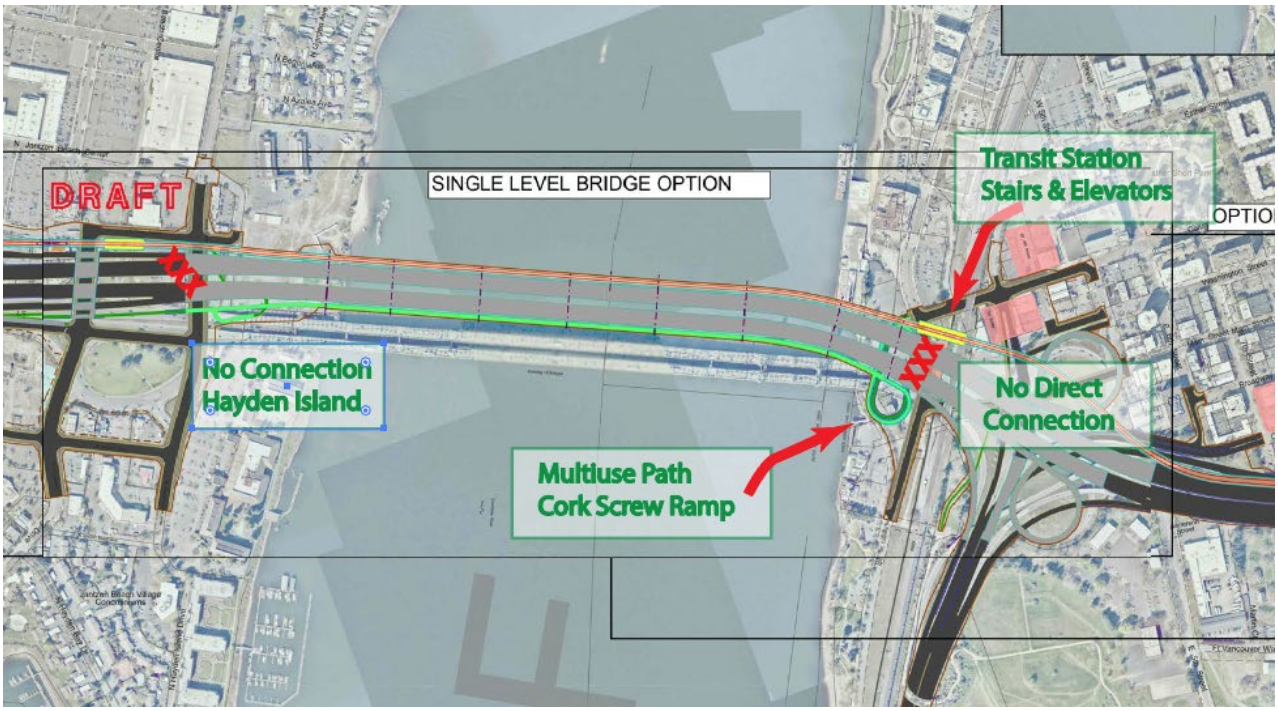
The multiuse path is built on the north bound main bridge span. The end point of the multiuse path on the Vancouver shoreline is approximately 100' in elevation above the ground and is access by a cork screw ramp of approx. ½ mile in length.

Though the Vancouver shoreline Light Rail Station and the end point of the Multiuse Trail are adjacent to each other and are both 100' in elevation above the ground, the access systems for each are entirely separate from each other. The stairs and elevators for transit users are not usable for users of the multiuse path. The ramp connection for multiuse path users that are not usable for transit riders.

The Hayden Island light rail station and Oregon side of the main bridge multiuse path has the same disconnection, though the elevation is less at about 35' above ground.

People who are not driving to their destination, a goal of the IBR, will often use several modes to reach their destination. Users may ride their bikes to a light rail station, place their bikes on the train in storage specially design for bikes on the light rail train, then ride their bikes for the final leg of their trip. The IBR design of entirely separate light rail and multiuse path access makes these blended trips difficult.

We believe additional study is needed to connect these two systems together.



Thank you
Laura Reynoldson

IBR Draft SEIS - RECORD #2398 DETAIL

First Name :	Laura
Last Name :	Lou
Attachments :	DSEIS-2398_Lou_Original.pdf (269 kb)

IBR Draft SEIS - RECORD #2398 DETAIL

Submission Date :	11/16/2024
First Name :	Laura
Last Name :	Lou
Business/Organization/Agency :	
Attachments :	Marine-Drive-Bike-Lanes LR.pdf (268 kb)

Submission Input :

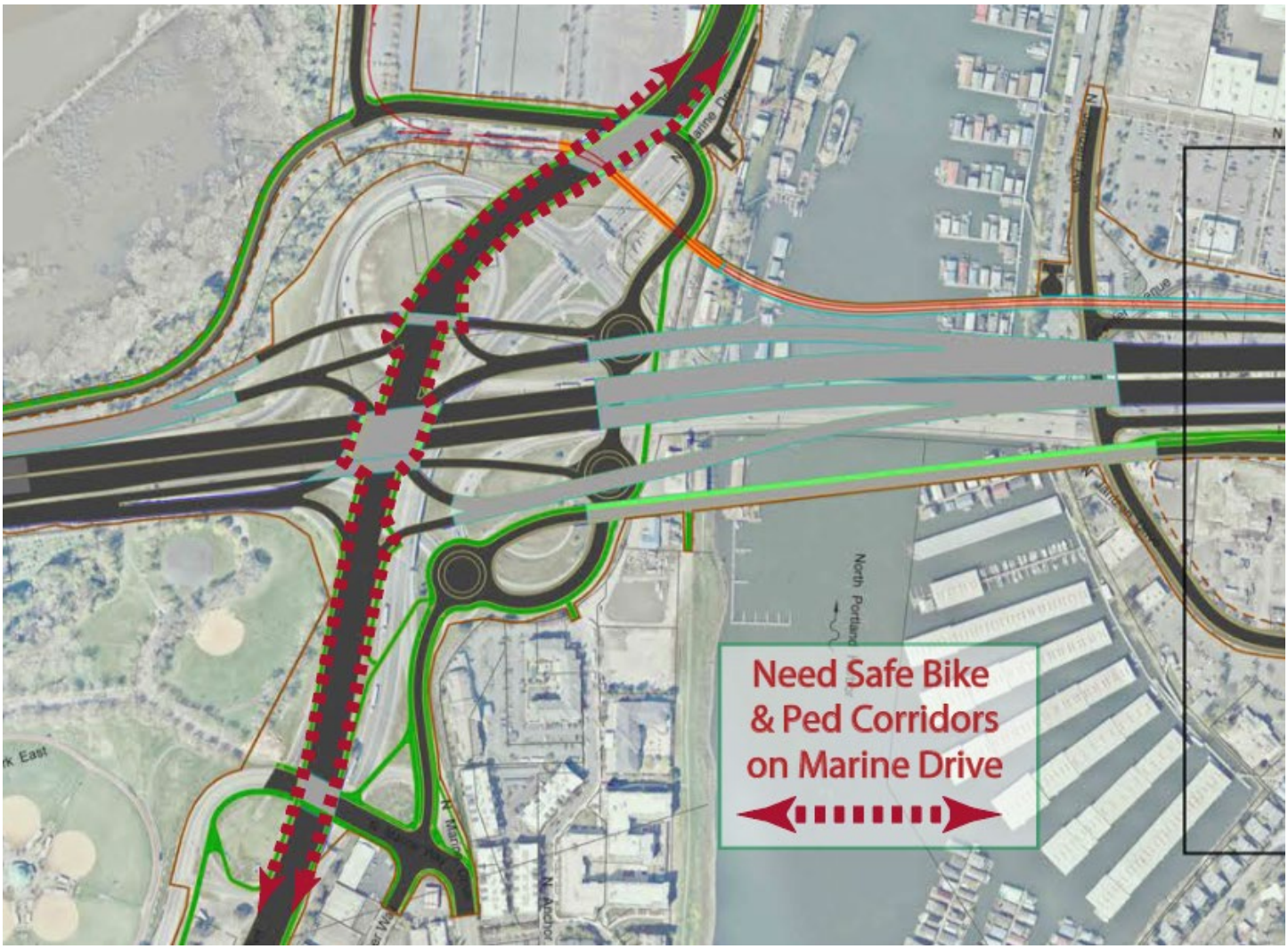
Draft SEIS public comment

Laura Reynoldson

Comments on Freight and Bike conflicts on the Marine Drive Single Point Interchange

The IBR proposed design for Bike lanes through the Marine Drive Single Point Interchange presents a major conflict between bike and Freight movements. As the Marine Drive interchange is considered to be one of the most important Freight Interchanges in the State of Oregon, we request that these pathways for active transportation be built separated from Freight movements to provide safe passage for active transportartion users.

This meets the purpose and needs of the IBR to (b) improve connectivity, reliability, travel times, and operations of public transportation modal alternatives in the Program area and(c) improve highway freight mobility and address interstate travel and commerce needs in the Program area.



Please study how these corridors could be built separated from the vehicle travel lanes using barriers or raised active transportation path ways. In addition, the IBR should study how to use the new technologies of sensors that detect active transportation user approaching intersections crossings. These advanced sensors triggers traffic signals, so that users crossing through many these intersections does not have to individually press a button at each crossing and wait for the signal to change one crossing at a time.

Thank you
Laura Reynoldson

IBR Draft SEIS - RECORD #2399 DETAIL

First Name :	Laura
Last Name :	Lou
Attachments :	DSEIS-2399_Lou_Original.pdf (451 kb)

IBR Draft SEIS - RECORD #2399 DETAIL

Submission Date :	11/16/2024
First Name :	Laura
Last Name :	Lou
Business/Organization/Agency :	
Attachments :	MLK-Undercrossing LR.pdf (450 kb)

Submission Input :

Draft SEIS public comment

Laura Reynoldson

[redacted]

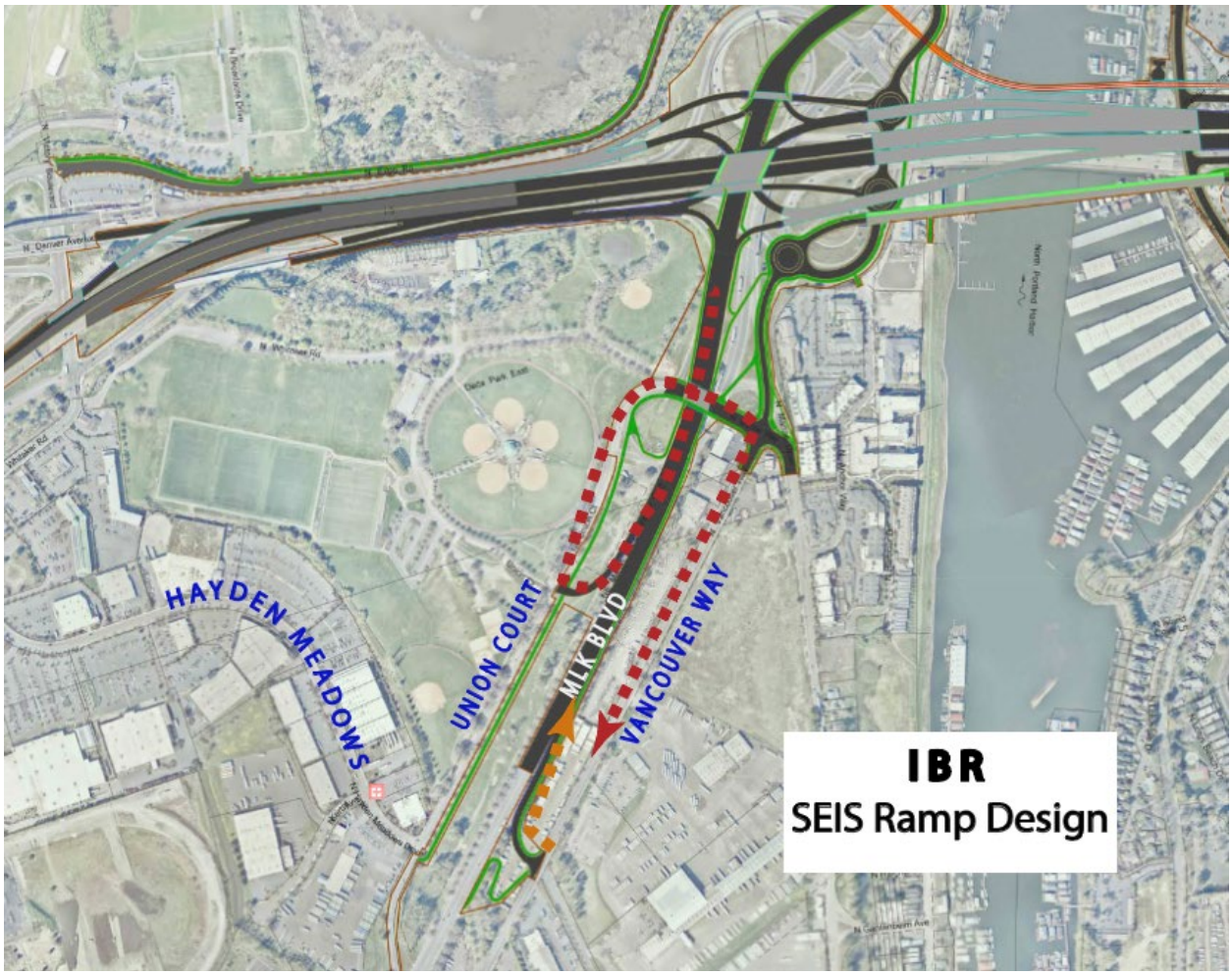
The MLK Undercrossing and Complete Interchange
Better Freight & Neighborhood Access Ramps for the IBR

Initial Proposed Design for MLK Access Ramps.

The Interstate Bridge Replacement (IBR) proposes a Martin Luther King (MLK) on-ramp and off-ramp design that meets very minimal requirements:

1) These ramps replace the existing ramp connections.
2) These ramps merge vehicles onto MLK further away from the Marine Drive single point intersection improving the merge/weave problems with the current intersection.

But this minimal ramp design does not excel with other important goals for Portland including efficient regional freight movement, recreational park safety and understandable way finding.



Problems with the proposed MLK ramp design

1) The proposed ramp design creates out of direction travel.
2) The proposed design is confusing to navigate. A traveler will take the off-ramp to leave the Marine Drive / MLK interchange, but not clearly see how to get back onto the Marine Drive / MLK interchange. There is the same way finding confusion in reverse

3) The proposed MLK off-ramp conflicts with Delta Park's primary recreational entrance. Since this a major Freight travel ramp, this ramp should not conflict with the major access to a major recreational area.
4) The proposed MLK ramp encourages Freight movement to use East Marine Drive for access when the Freight Master plan wants freight travel to use Columbia Blvd to MLK for Freight Access rather than East Marine Drive which is a local neighborhood roadway.

Proposal - MLK Undercrossing and Complete Intersection

There is a better design to meet all of IBR requirements while also meeting broader Portland Freight, Neighborhood and Parks planning goals.

This new ramp design proposes an undercrossing under MLK connecting Hayden Meadows Drive to Vancouver Way. This new MLK undercrossing combined with slightly relocated MLK on-ramps and off-ramps has the following advantages:

1) The Complete MLK Intersection minimizes out of direction travel.
2) The complete MLK intersection removes Freight users from the main Delta Park Entrance.
3) This design would be easier to navigate. It is more understandable for Freight and other users just how to get on and off MLK and the access the Marine Drive Interchange.

4) The new undercrossing meets the purpose and need of the IBR : (a) improve travel safety and traffic operations on the I-5 river crossing **and associated interchanges**; (c) **improve highway freight mobility** and address interstate travel and commerce needs in the Program. The MLK Undercrossing designs meets the purpose and needs better than the minimal IBR ramp design.
5) Lastly the MLK undercrossing provides a new way to access the Hayden Meadows Drive commercial shopping area. This new access could help off-set the removal of the direct access to Hayden Meadows that exist today from the current Marine Drive intersection to I-5 South to Interstate Ave off ramp. This existing off ramp connection from Marine Drive south bound on-ramp to Interstate Ave was removed to provide for the new Braided Ramp from Marine Drive to I-5. This Interstate Ave ramp connection from I-5 still exits if someone is on the main line of I-5. However Marine Drive travelers on the local Portland system wanting to access Interstate Ave in the IBR proposed design would have to travel through the three new Marine Drive traffic circles, then to Expo Road then connect to Interstate Ave. The MLK undercrossing design would create another more direct way to get to Hayden Meadows Drive and Interstate Ave.

IBR's Response to building the MLK Undercrossing

Have Portland Fund This – Not the IBR
This undercrossing has been proposed to the IBR early in the design process. IBR has stated that a MLK undercrossing might be nice to have but that the undercrossing should be something that City of Portland funds later.

A complete MLK Undercrossing and ramp design is more appropriate to be included in the IBR funding package. This undercrossing improves Freight connections for this intersection described as Oregon's Most Important Freight Interchange. The MLK Undercrossing excels at meeting the IBR purpose and need (c) **improve highway freight mobility**.

Rather than the IBR build a minimally acceptable ramp design and suggest the local city come back later and rebuild the preferred connection is not good public policy. The cost of the undercrossing would be an exceptionally large funding request for Portland. The Undercrossing is more appropriate to be funded in the budget for a project that describes itself as building a bridge to meet the needs for the next 100 years.

Please study the MLK undercrossing and full interchange design.
Involve the Freight Community, the local residents, Portland Transportation and Portland Parks.
Let's work together to refine a ramp and undercrossing design that excels at meeting section C of the purpose and need of the IBR to improve freight mobility.

Thank you
Laura Reynoldson

IBR Draft SEIS - RECORD #2400 DETAIL

First Name :	Laura
Last Name :	Lou
Attachments :	DSEIS-2400_Lou_Original.pdf (502 kb)

IBR Draft SEIS - RECORD #2400 DETAIL

Submission Date :	11/16/2024
First Name :	Laura
Last Name :	Lou
Business/Organization/Agency :	
Attachments :	Separating-Freight-Bike-Travel LR.pdf (500 kb)

Submission Input :

Draft SEIS public comment

Laura Reynoldson

[redacted]

Separating Freight and Bike Travel
on the Marine Drive Interchange and On-Ramps

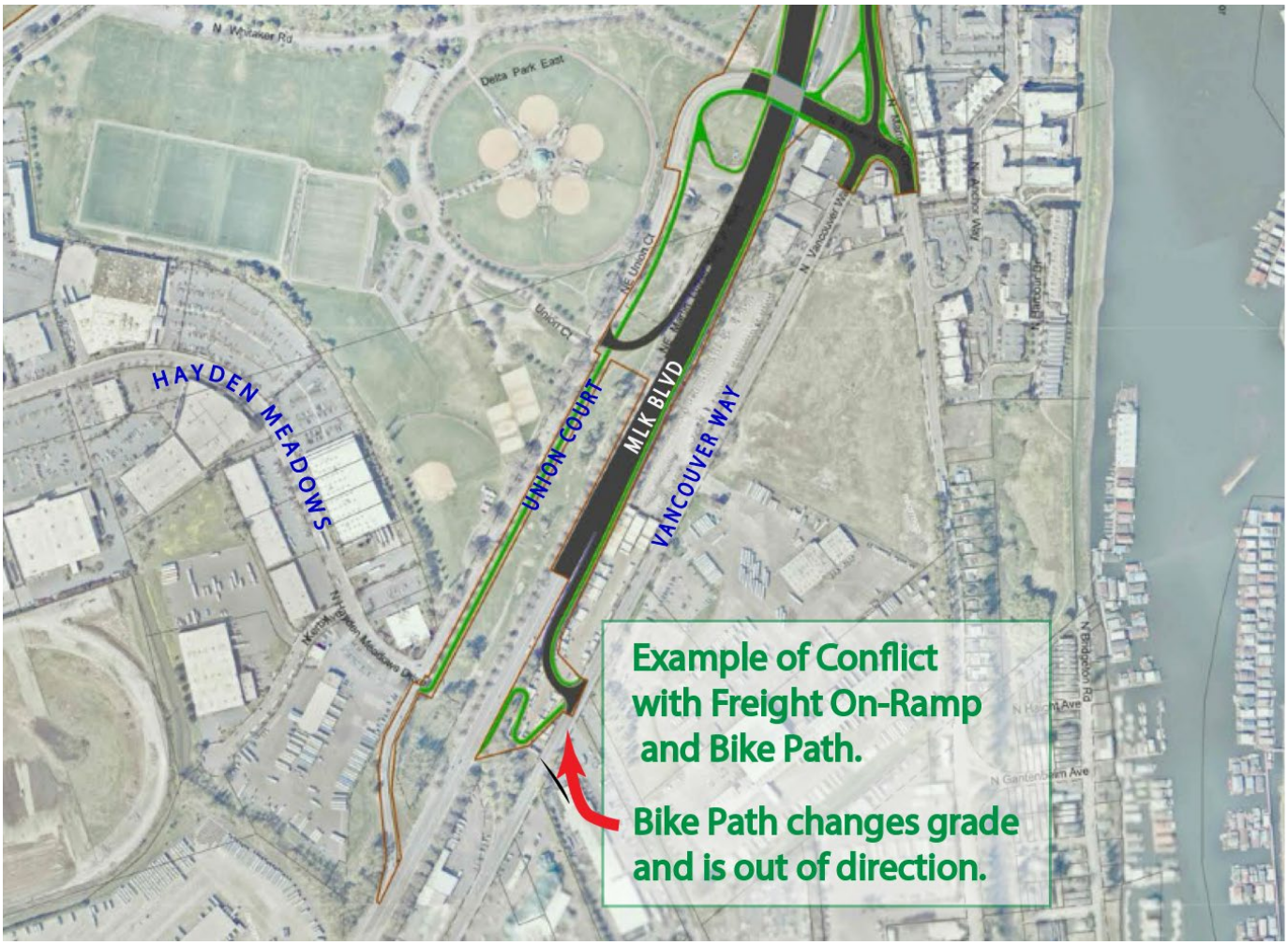
One important purpose and need of the IBR is to (c)improve highway freight mobility and address interstate travel and commerce needs in the Program area.

Another important purpose and need is to (b) improve connectivity, reliability, travel times, and operations of public transportation modal alternatives in the Program area.

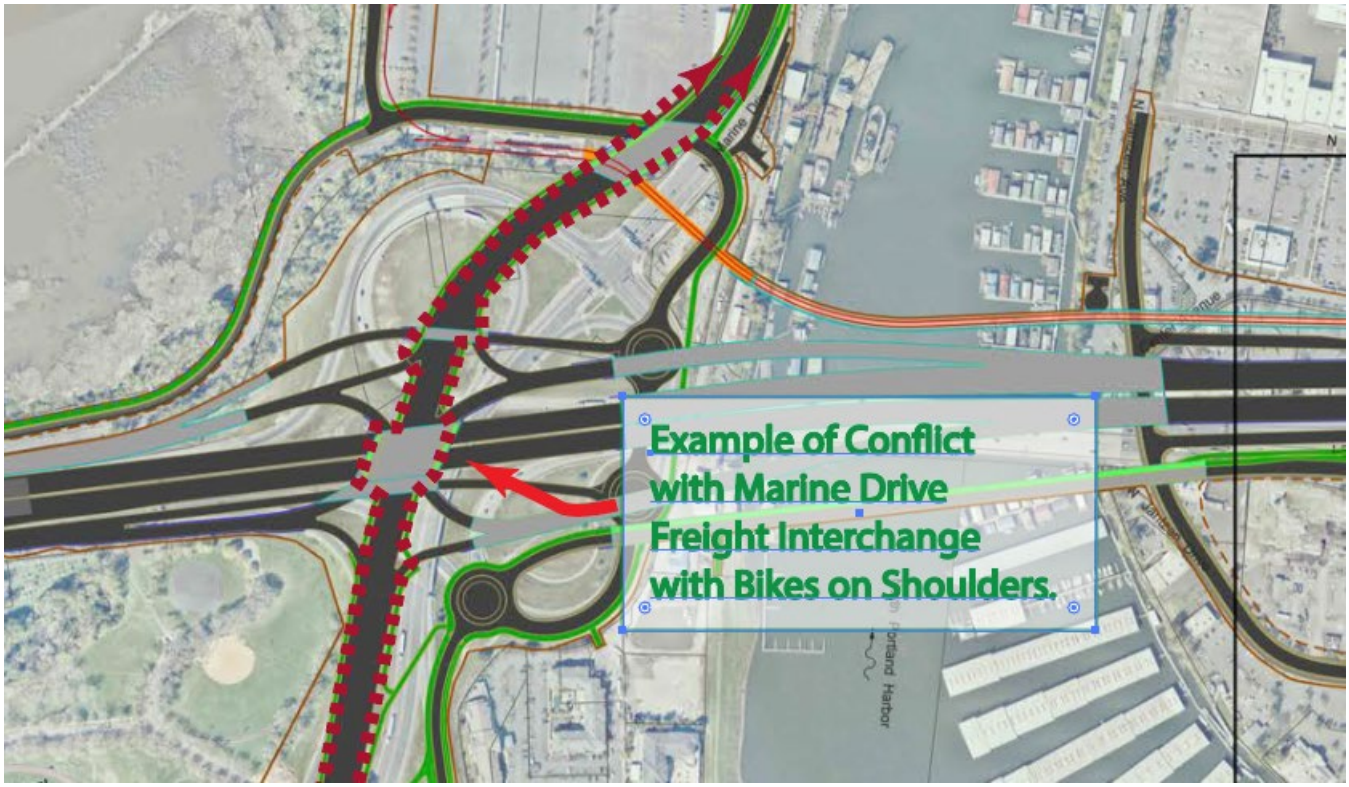
A way to meet the purpose and needs of both Freight Users and Active Transportation Users is to build active transportation routes physically separated from Freight routes as much as possible. Maximizing this separation is key to creating efficient Freight routes while creating safer, more attractive, and therefore more heavily used walking, rolling, and biking routes.

Examples of Conflicts between Freight and Active Transportation users.

The proposed IBR design for the ramp from Vancouver Way to MLK North poses significant conflict between Freight and Bikes, as the proposed Bike route travels changes grade along a switch back, crosses a major Freight intersection and climbs a grade up along a freight-heavy on-ramp.



Another example of possible Freight-Bike conflict is in the Marine Drive Interchange. Here IBR proposes to build a complete bike lanes and pedestrian sidewalk on both sides of the Interchange.



Even if the IBR is required by State Law to provide bike and pedestrian facilities on the Marine Drive interchange, we recommend additional study on improving two aspects of these improvements:

1) Any facilities for bike and ped that must be built on Marine Drive needs to be built in a way that separates bike and ped travel from Freight as much as possible using techniques such as barriers, and raised bike roadways.

2) To discourage any active transportation users from crossing the Marine Drive interchange, also build alternative routes that go around the Marine Drive Interchange rather than through the interchange. This separate bike ped system needs be so well design that it becomes the preferred route. Current IBR design has the MLK active user connection provided partially along MLK shoulders and partially on separated trails. To become the preferred route, an active transportation route that is not reliant of MLK shoulders need to be developed. This separated preferred corridor needs to conveniently link to each of the existing regional bike corridors.

Complete separation creates safety for both the people that are walking, biking and rolling in this area, but also makes it safer and more efficient for Freight Users who don't have to worry about negotiating on ramps with curves and with grade changes while watching out for bike users traveling the exact same routes.

This separation better meets 3 parts of the purpose and needs statement of the IBR; (a) improve travel safety and traffic operations on the I-5 river crossing and associated interchanges; (b) improve connectivity, reliability,

travel times, and operations of public transportation modal alternatives in the Program area; (c) improve highway freight mobility and address interstate travel and commerce needs in the Program area.

Given the Marine Drive interchange is usually described as the **most heavily used Freight corridor in Oregon**, we encourage the IBR to work with the Active Transportation Users in combination with the Freight Users **together rather than separately** to refine designs that efficiently moves Freight Users through the Marine Drive Interchange and Active Transportation Users around the Interchange.

Thank you
Laura Reynoldson

IBR Draft SEIS - RECORD #2401 DETAIL

First Name :	Laura
Last Name :	Lou
Attachments :	DSEIS-2401_Lou_Original.pdf (214 kb)

IBR Draft SEIS - RECORD #2401 DETAIL

Submission Date :	11/16/2024
First Name :	Laura
Last Name :	Lou
Business/Organization/Agency :	
Attachments :	Synergies-Empowered-by-the-IBR LR.pdf (214 kb)

Submission Input :

Draft SEIS public comment

Laura Reynoldson

[redacted]

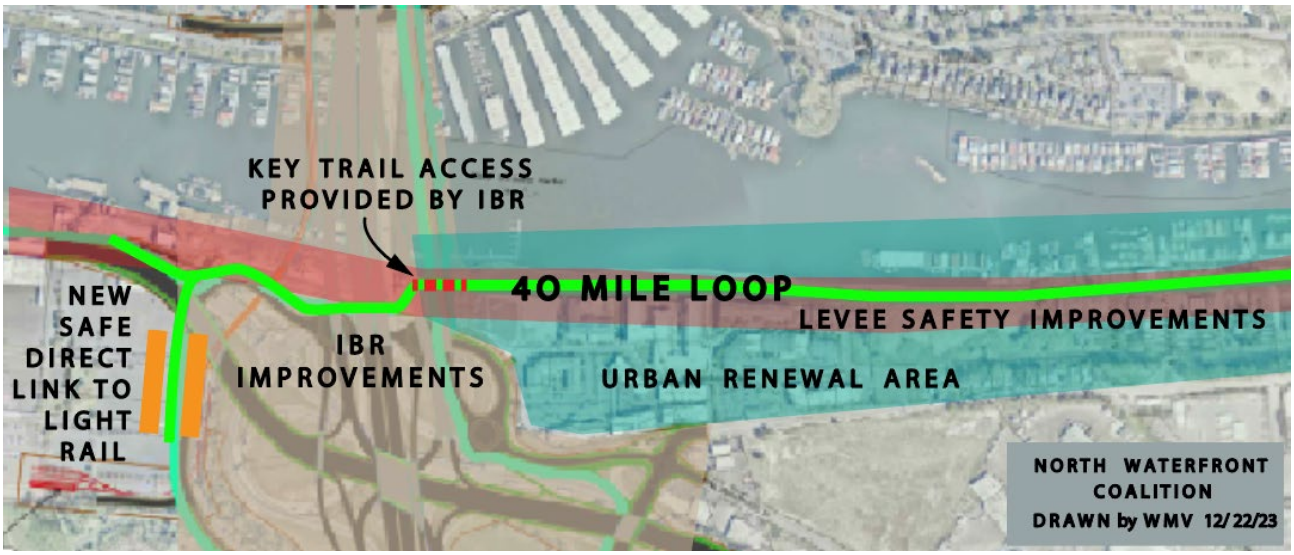
Synergies Empowered by the IBR

Coordinate synergies between improvements by the IBR and other large public and private projects being constructed at the same time. This synergy coordinated by the Cities of Portland and Vancouver could create public amenities greater than any of the individual projects could provide on their own.

Example: **Create Bridgeton Trail Segment of the 40 Mile Loop**

1) IBR Road system requires acquisition of property in order to build the new Harbor Bridges. That property under the new bridges finally puts into public ownership a key missing trail segment of the 40 Mile Loop.
2) At the same time as the IBR, the Army Corp of Engineers is upgrading the adjacent levee. The improved levee will be higher in elevation and finished with a compacted gravel maintenance road.
3) That key trail segment is also located in an existing Portland urban renewal district. The urban renewal district has already designed the finished trail, amenities and connections to local walkways. The urban renewal district had set aside funds to do the finish work once the trail easements were acquired.
4) By completing this Trail segment, Hundreds of residential units in Bridgeton have a direct, protected and safe way to walk and roll to the Expo Light Rail Station. This enhances ridership numbers for the IBR Light Rail and FTA funding requests.

The City of Portland can coordinate these projects together. Work IBR is already planning to do can create a synergy that builds a key piece of Trail infrastructure greater than any one project could do on their own.



This is just one example of possible synergies empowered through the IBR.
There are other synergies for Hayden Island, Vancouver Waterfront and Historic Reserve.

Thank You
Laura Reynoldson

IBR Draft SEIS - RECORD #2402 DETAIL

First Name :	Laura
Last Name :	Lou
Attachments :	DSEIS-2402_Lou_Original.pdf (563 kb)

IBR Draft SEIS - RECORD #2402 DETAIL

Submission Date :	11/16/2024
First Name :	Laura
Last Name :	Lou
Business/Organization/Agency :	
Attachments :	The-40-Mile-Loop-Connections LR.pdf (561 kb)

Submission Input :

Draft SEIS public comment

Laura Reynoldson

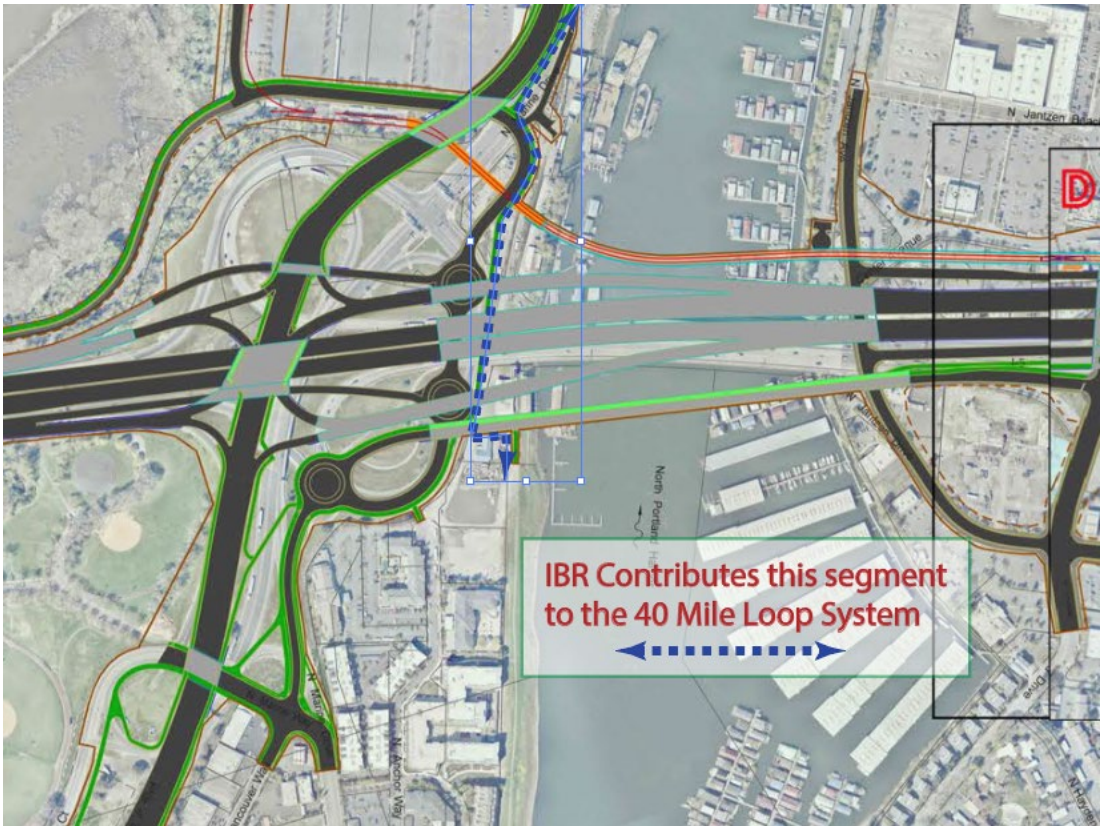
Comments on IBR Multi-Use path connections
to the 40-Mile Loop East/West Corridor

The 40-Mile Loop is a comprehensive regional trail system forming a central Hub that connects nearly all other regional trails and parks within Multnomah County. The Loop alignment has been planned and incorporated into regional land use frameworks for over 40 years. While the trail alignment for the 40-Mile Loop has long been established, certain easements remain unacquired, and some portions of the trail are yet to be constructed.

The adopted alignment of the 40-Mile Loop passes through the area impacted by the Interstate Bridge Replacement (IBR) project. While the IBR project provides several benefits to the 40-Mile Loop, we believe additional study is warranted to make the proposed trails safer and more usable.

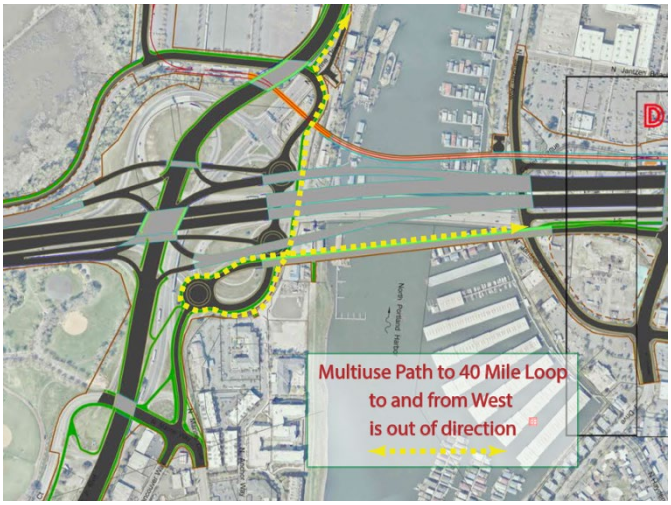
IBR Positive Contributions to the 40-Mile Loop Trail

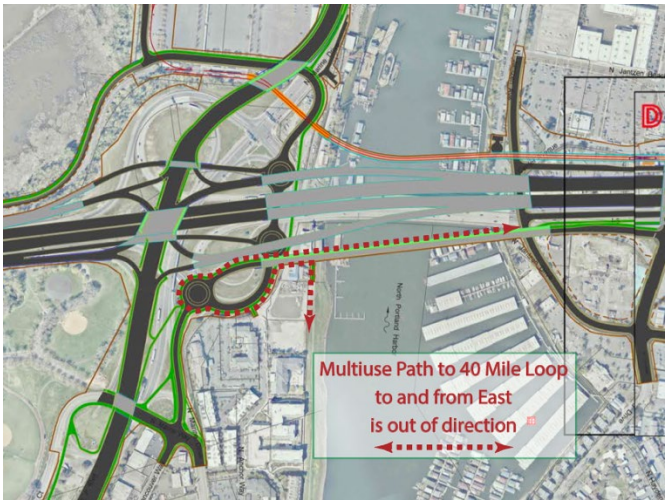
The IBR project will construct the segment of the 40-Mile Loop within the project area. This new trail segment will provide a safe, separated trail connecting the existing 40-Mile Loop trail located west of the proposed bridges through the project area, under the many new IBR bridges emanating from mainland Portland. After crossing under the local Harbor Bridge, the east most bridge proposed, the IBR will stub out the Trail to the East for a future connection to the Bridgeton Trails segment of the 40 Mile Loop. This is a good trail addition to the 40 Mile Loop and appreciated by the 40 Mile Loop Land Trust board.



Concerns with the Proposed Connection of 40 Mile Loop to the multiuse path on the local Harbor Bridge.

However, the proposed trail connections from the multiuse path on the local Harbor Bridge to the new 40-Mile Loop segment is not optimal. The proposed design requires users to travel out of their way, navigating a traffic circle and crossing vehicle lanes to reach both the eastbound and the westbound trail connection. This routing is neither convenient nor efficient and could discourage its use.





Request for Further Study of better East and West Connections to the 40 Mile Loop

We strongly recommend that alternative design options be considered to provide a more direct, connection to and from the east and west to the local Harbor Bridge multiuse path.

Possible additional study include:

1) Creating a direct connection from the East stub of the Bridgeton Trail to the sidewalk on the east side of the local Harbor Bridge. This direct connection would make it easier and more appealing for cyclists and pedestrians to cross the Harbor Bridge, while also offering a scenic route with views of North Portland Harbor and Mt Hood.
2) Additionally, we request that the sidewalk on the east side of the local Harbor Bridge be designed to be as wide as possible, with areas to rest and enjoy the views, further enhancing the experience for users.
3) Study more direct trail connections from the local Harbor Bridge multi use path to both the east and the west that do not involve routes around the Marine Drive traffic circles and crossing travel lanes.
4) Study routing the IBR entire multiuse path on the west side of the bridges rather than the east side. If the multiuse path was located on the light rail bridge on the west side, the east and west connection would be straight forward and direct. The west side multi use path is discussed more in a separate comment.
5) Lastly, we have a separate comment on ways the IBR could facilitate more just a stub for the east side connection to the Bridgeton Trail segment of the 40 Mile Loop.

Thank you
Laura Reynoldson

IBR Draft SEIS - RECORD #2403 DETAIL

First Name :	Timothy
Last Name :	Wood
Attachments :	DSEIS-2403_Wood_Original.pdf (6 kb)

IBR Draft SEIS - RECORD #2403 DETAIL

Submission Date :	11/16/2024
First Name :	Timothy
Last Name :	Wood
Business/Organization/Agency :	

Submission Input :

Hi there,

Portland resident here [redacted] I have a couple thoughts.

- This bridge must have light rail. Otherwise I'll advocate that Oregon pulls funding (I'm not influential I'll just write my reps. Thought I'd share my thoughts, though.) because there's no benefit for Oregon. If SW WA wants a new bridge they have to accept they're part of the region.

- Just build the damn bridge. I'm so exhausted by how many committees and public comment periods and environmental review elements I hear about with respect to this project. It's been decades. Quit giving space and attention to activists whose entire goal is further delay. This project gets more expensive by the month. Build something or stop trying. Either way I'm good.

Thanks,

Tim Wood

IBR Draft SEIS - RECORD #2404 DETAIL

First Name :	Laura
Last Name :	Reynoldson
Attachments :	DSEIS-2404_Lou_Original.pdf (245 kb)

IBR Draft SEIS - RECORD #2404 DETAIL

Submission Date :	11/16/2024
First Name :	Laura
Last Name :	Lou
Business/Organization/Agency :	
Attachments :	The-Vancouver-Dip LR.pdf (244 kb)

Submission Input :

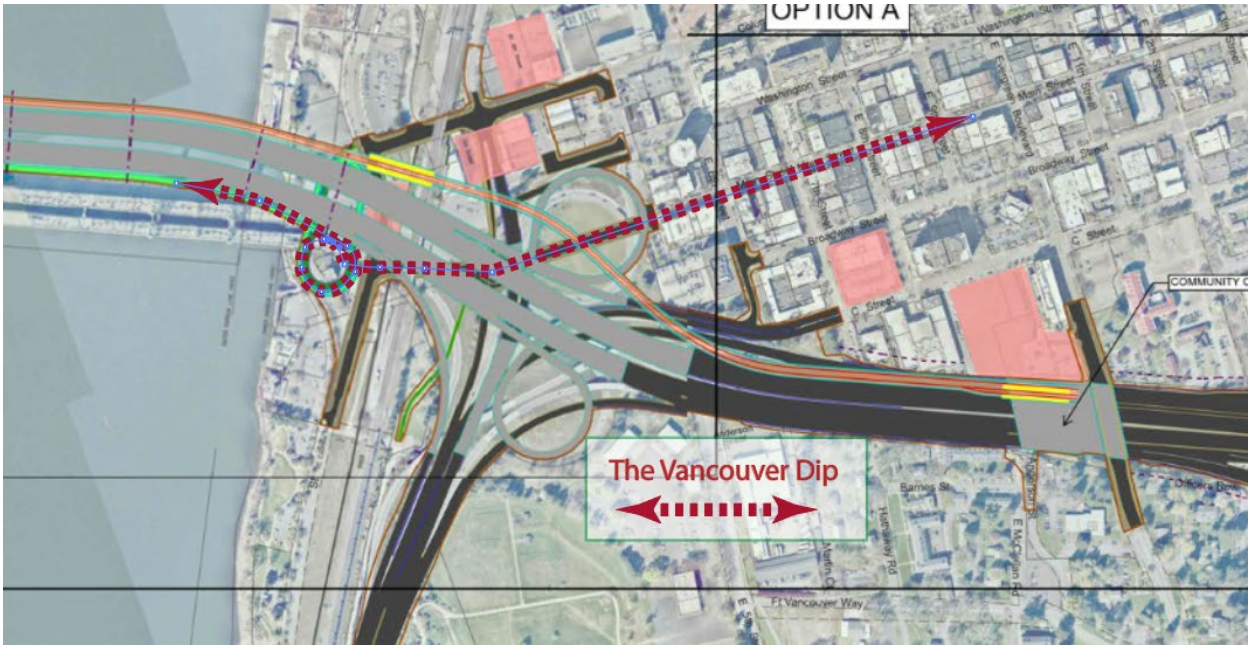
Draft SEIS public comment

Laura Reynoldson

Comments on the out of direction way active transportation users connect to the Multi-Use Path on the Vancouver shoreline.
The Vancouver Dip.

If you are traveling by active transportation from central Vancouver, you must first travel down grade to the Vancouver shoreline, then travel up the long spiral ramp to connect to the main bridge multi use path. We call this the Vancouver Dip.

This is a significant barrier that will discourage use of active transportation due to the extra effort needed to travel down grade from central Vancouver to the shoreline, then up a long ramp to go south on the multiuse path. Northbound travel by active transportation user would experience the same Vancouver Dip in reverse.



The Vancouver Dip does not meet the IBR purpose and need to; (b) improve connectivity, reliability, travel times, and operations of public transportation modal alternatives in the Program area.

To better meet the purpose and need, additional study is needed to see if the multiuse path could be extended to the next light rail station which is proposed to be a transit hub for Vancouver. This transit hub brings together the new light rail line extension and several BRT lines together. Adding a direct connection to the multiuse path at this transit hub would encourage active users and facilitate active transportation users using both transit and biking efficiently for their complete non-auto trip. This would eliminate the Vancouver Dip.

One idea that needs additional study that would alleviate the disconnection between transit and active transportation users is to place the multi-use path and the transit line next to each other on the west side of the southbound main bridge. This idea of the west side multiuse path will be discussed more in a separate comment.

Thank you
Laura Reynoldson

IBR Draft SEIS - RECORD #2405 DETAIL

First Name :	Laura
Last Name :	Lou
Attachments :	DSEIS-2405_Lou_Original.pdf (332 kb)

IBR Draft SEIS - RECORD #2405 DETAIL

Submission Date :	11/16/2024
First Name :	Laura
Last Name :	Lou
Business/Organization/Agency :	
Attachments :	West-Side-Mulituse-Path LR.pdf (331 kb)

Submission Input :

Draft SEIS public comment

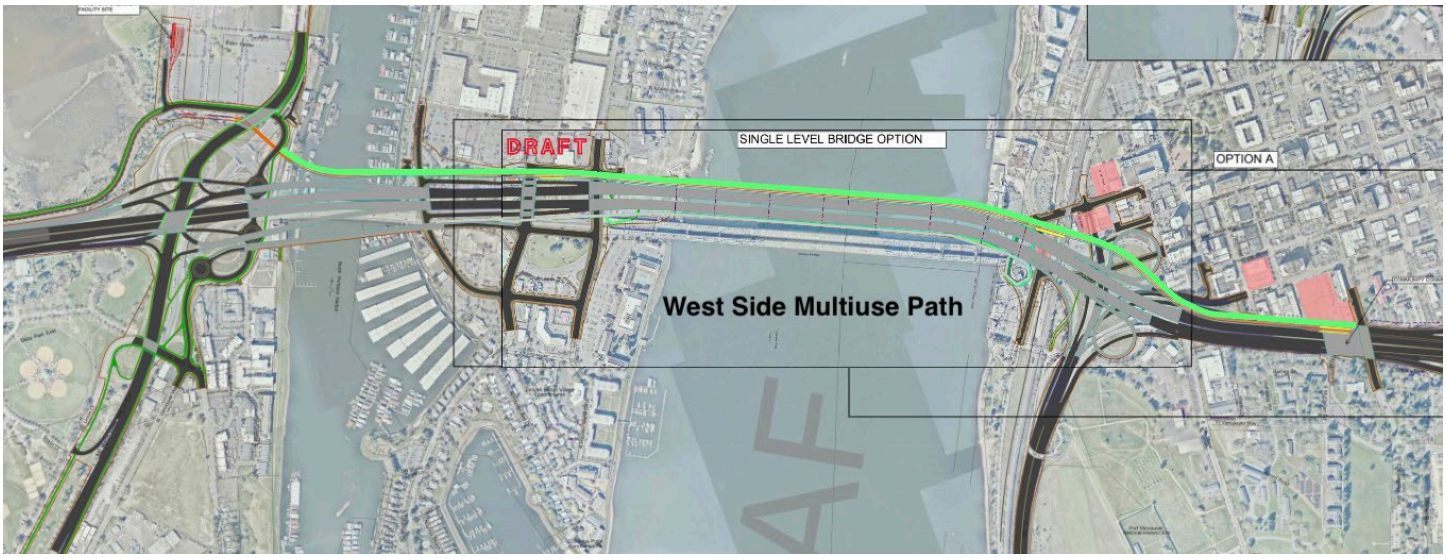
Laura Reynoldson

Comments on Studying building both the multi-use path and the light rail line on the west side of the south bound main bridge

The IBR proposes building the light rail line on the south bound main bridge and the multiuse path on the north bound main bridge span. The IBR proposal makes each system separate from each other. The IBR proposal makes connections between these two systems difficult and inefficient for transit and active transportation users.

The IBR proposal has stairs and elevators providing connections for transit users but the stairs and elevators are not usable for users of the multi-use path. The multi-use path has ramp connections for users that are not usable for transit riders. Though these two systems are parallel to each other, but they are entirely separated systems. These systems do not connect easily even though active transportation users want to connect to transit.

We believe additional study is needed to connect these two systems together. People who are not driving to their destination, a goal of the IBR, will often use several modes to reach their destination. Users may ride their bikes to a light rail station, place their bikes on the train in storage specially design for bikes on the light rail train, then ride their bikes for the final leg of their trip. The IBR design of entirely separate light rail and multiuse path makes these blended trips difficult.



One idea that needs to be studied more is to build the multiuse path next to the light rail alignment on the south bound main bridge. Compared to the multiuse path on the east side of the main bridge, the multiuse path on the west side next to the light rail alignment better meets the purpose and needs statement for the IBR to (b) improve connectivity, reliability, travel times, and operations of public transportation modal alternatives in the Program area. The west side alignment provides the following improvements:

• Seamless Transition: Users should easily switch between transit and active transportation at any station, with no grade changes or distance barriers.

• Shared Elevator Access: Allowing active transportation users to share transit station elevators eliminates the need for additional infrastructure, making the design more efficient and accessible.

• Creates reductant ways to connect to both transit and multiuse path: If the elevator is not working, users can use the ramp or stairs. User not able to negotiate going up the long ramps can use the elevator. Bike users who get a flat tire on the multiuse path can connect to the light rail station and still get to their destination.

• Provides Eyes on the Path: Transit operators and passengers provide a continuous presence, reducing the isolation felt on a multi-use path and enhancing safety and comfort.

• Better Emergency Egress: The multi-use path should double as an emergency exit route for the transit way, supporting user safety during unexpected events.

• Inclusive Design Principles: These principles ensure the accessibility and usability of both transit and active transportation facilities for individuals of all abilities.

• By building the multiuse path on the west side of the light rail trackway provides greater separation from vehicle noise and would offer a more pleasant experience for active transportation users compared to a multiuse path on the east side immediately next to vehicle travel.

• If the multiuse path was built next to the light rail line on the light rail bridge crossing North Portland Harbor, then the multiuse path connection to the 40 Mile loops would be direct rather than out of direction when the multiuse path is on the local Harbor Bridge.

Regarding Views: There is a good view of Mt Hood if the multiuse path in on the east side of the north bound main bridge, however there is a good view to the west too. Additionally, a quality view of North Portland Harbor and Mt Hood views could be experienced on the local harbor bridge, but the IBR proposes the multiuse path on the west side of that local Harbor Bridge. The IBR also shows a side walk on the east side of the local Harbor Bridge. We propose that the side walk on the east side of the Local Harbor Bridge be as wide as possible and include wide spots for stopping on the route to rest and appreciate one of the region's best view of North Portland Harbor.

View East from Local Harbor Bridge

Thank you,
Laura Reynoldson

IBR Draft SEIS - RECORD #2406 DETAIL

First Name :	Scott
Last Name :	Kelly
Attachments :	DSEIS-2406_Kelly_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #2406 DETAIL

Submission Date : 11/16/2024
First Name : Scott
Last Name : Kelly
Business/Organization/Agency :

Submission Input :

First Name:
Scott

Last Name:
Kelly

Email:
[redacted]

Topic Area:
Transportation

Comment:
I regularly bicycle across the existing I-5 bridge over the Columbia River. It is loud, debris-laden, and results in poor air quality for anyone outside a car or truck. The proposed IBR bike/ped path is barely an improvement over the current situation. The proposed path is directly adjacent to the northbound traffic lanes, which will continue to be agonizingly noisy. The proximity to traffic lanes will also continue to cause active users (bicyclists and pedestrians) to be exposed to motor vehicle exhaust for the entire length of the crossing. In addition, the proposed path will accumulate garbage thrown or blown from vehicles, vehicle parts, glass, and other debris.

We have two examples of similar bike/ped facilities in the area: the Glen Jackson bridge and the NE Pedestrian Trail along I-84 east of NE 122nd Ave. Both of these off-road paths are extremely unpleasant and unsafe to use due to the noise, poor air quality, and debris. Rather than encouraging people to use active transportation to cross the river, the proposed IBR plan will do the opposite; encourage people to use their car. It's hard to imagine anyone walking or bicycling across the proposed bridge for pleasure with the proposed alignment.

In addition to the poor location of the bike/ped path, the elevation gains at Hayden Island and in Vancouver will be formidable challenges for many potential users, adding unnecessary out-of-direction travel to reach the other side. The long spiral ramps will also be dangerous to descend during wet or icy conditions. The bike/ped route should be at no greater slope and length than the LRT route.

A much better configuration would be to align the bike/ped path on the west side of the proposed LRT route, and extend at least to the Expo Station on the Portland side and to the Evergreen Station on the Vancouver

side. To make this a true multi-modal facility, the bike/ped path should have access to the proposed elevators and platforms for the Hayden Island LRT Station and the Waterfront LRT Station, allowing travelers the flexibility to walk, bicycle, or use the LRT for all or part of their trip.

JCA comment #: 501

IBR Draft SEIS - RECORD #2407 DETAIL

First Name :	Marian
Last Name :	Rhys
Attachments :	DSEIS2407_Rhys_Original_redone.pdf (100 kb)

Public comment on the Interstate Bridge Replacement Program
November 2024

In January, 2000, the Oregon and Washington departments of transportation issued a joint report on the Interstate 5 corridor, titled "Portland/Vancouver I-5 Trade Corridor: Freight Feasibility and Needs Assessment." The "Summary of Findings" in the Executive Summary of that report presented the following major points:

- Interstate 5 is the primary economic lifeline on the West Coast. The most economically significant segment of I-5 in the Portland/Vancouver region is in North Portland and Vancouver, where the freeway intersects with the Columbia River. Here, the interstate provides access to deep-water shipping, up-river barging, and two water-level transcontinental rail lines.

- Interstate 5 is currently the most congested segment of the regional freeway system in the Portland/Vancouver area. Without attention, future congestion in this important transportation corridor threatens the livability and economic promise of the Portland/Vancouver region.

- To maintain the economic competitiveness of the Portland/Vancouver region, and to maintain the high quality of life, this region needs to develop a Strategic Plan for managing demand in the I-5 Trade Corridor and making a balanced set of improvements in the corridor. To keep up with mobility needs in the corridor, there must be highway, transit, and freight and passenger rail improvements, along with demand management. No single strategy will solve the problems in the corridor. There is no silver bullet.

- Improvements in the corridor will be costly and most cannot be funded with existing transportation revenue. It is possible, however, to fund public improvements in the I-5 Trade Corridor with a combination of federal funds, tolling, and state funding from Oregon and Washington.

It is clear to me that the current Interstate Bridge Replacement Program does ***NOT*** adequately address these points. In fact, it contradicts the statement "No single strategy will solve the problems in the corridor. There is no silver bullet." Quite the contrary; the IBR is presented as a silver bullet that will supposedly solve the complex transportation issues in this corridor. It will not.

Rather, what is needed is "to develop a Strategic Plan for managing demand … and making a balanced set of improvements in the corridor. … [T]here must be highway, transit, and freight and passenger rail improvements, along with demand management." A single high-elevation freeway mega-bridge is not a balanced approach to this problem.

What is needed in this corridor includes improvements for not only private rubber-tire roadway vehicles, but also rail (both freight and passenger) and waterway navigation. Demand management is also a critical part of solving congestion in this corridor—reducing the number of vehicles crossing the river. Finally, greenhouse gas emission reduction has since emerged as a critical issue, further highlighting the need for a balanced approach to improving traffic movement.
Demand management—not even addressed in the current proposal—needs to be a fundamental part of this project. Reducing the number of rubber-tire vehicles traveling through this corridor could free up space for the critical commercial freight traffic so important to the economic vitality of our region. Private automobile traffic could be reduced with an effective public transit system and active

transportation facilities. Even the volume of commercial truck traffic could be reduced, by shifting some freight to rail—a much more fuel-efficient and environmentally friendly mode of transportation.

The most egregious omission of the current IBR program is the lack of consideration of two alternative options:

- A lower bridge with a lift span
- An immersed tunnel

In addition to decreasing both the cost and the environmental destruction required by the project, either of these options would immensely improve the seismic safety of the river crossing. A 116-foot-high mega-bridge, on the other hand, would ***NOT*** be seismically safe, no matter how sturdily it is built; in fact, it might even be less safe than the current bridge, during an earthquake. It would also present a significant barrier to active transportation travelers, requiring them to negotiate a height equivalent to a six-story building. (It is noteworthy that none of the rendered views of the proposed bridge has shown a close-up from below, as viewed by a pedestrian, wheelchair user or bicyclist.)

Furthermore, improvements to the railroad bridge just downstream from the current I-5 bridge could reduce the number of lifts required for the highway bridge by ninety percent, by replacing the swing span in that bridge with a lift span closer to the center of the river. Such an improvement would benefit both highway bridge users and waterway traffic, and at a much lower cost than the proposed mega-bridge.

Even though the railroad bridge is privately owned by BNSF Railroad, it also functions as a public good, and a serious effort should be made, to negotiate with the bridge owner; public money is available for such improvements.

In short, the current IBR proposal (whose very name broadcasts the message that it focuses on only one small part of the transportation challenges in this corridor) is, to say the least, incomplete. This is a grave disservice to taxpayers, who must fund this project, to the commercial shippers who rely on this connection for their livelihoods, and to all travelers through this corridor.

I strongly urge the planners to take a broader look at this project, as our two states' departments of transportation did in 2000, and come back with a plan that is lower cost and less destructive to the physical and social environments, and that actually solves the problems with the current configuration. Our region, and future generations, deserve no less.

Marian Rhys, [redacted]

IBR Draft SEIS - RECORD #2408 DETAIL

First Name :	Bradley
Last Name :	Perkins
Attachments :	DSEIS-2408_Perkins_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #2408 DETAIL

Submission Date : 11/16/2024
First Name : Bradley
Last Name : Perkins
Business/Organization/Agency :

Submission Input :

First Name:
Bradley

Last Name:
Perkins

Business or Organization:
Cascadia High Speed Rail, LLC

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
The bipartisan approved Infrastructure Investment Jobs Act (IIJA) provides a strong platform for investment in

Cascadia High Speed Rail which has concluded multiple studies including a corridor plan by a concept plan technical expert. A part of the IIJA is the TIFIA funding program, which requires that infrastructure projects costing more than $750 milliaon to include the study of a private sector alternative if it reduces costs, which our CHSR Corridor Concept Plan clearly does. FWHA has also created multi-modal "MEGA" and "INFRA" funding programs for alternatives such as high-speed rail that can complement the I-5 Columbia River Crossing Project by satisying signicant environmental problems and equity goals. These funding programs and the National Environmental Protection Act require that major transportation projects must meet important CO2 reduction and equity goals inorder to qualify for funding. Cascadia High Speed Rail, LLC studies have proven that we can meet these goals by reducing 30% of the congestion on I-5, whereas the IBR Program cannot. We are open to meet and discuss how we can work together in partnership. CHSR, LLC has corridor plans near I-5, BNSF, and Hwy. 217 to a new Columbia River Bridge Crossing west of the BNSF Bridge for CHSR, BNSF, and vehicles. For multiple reasons a new I-5 Bridge is not feasible. CHSR, LLC has also developed plans for dual underground tunnels, one on each side of the existing I-5 Bridge showing connections to all existing entrances and exits. Each tunnel would be double stacked, four lanes per tunnel, eight lanes total and cost less than a monolithic bridge.

JCA comment #: 499

IBR Draft SEIS - RECORD #2409 DETAIL

First Name :	N/A
Last Name :	N/A
Attachments :	DSEIS-2409_NA_Original.pdf (6 kb) grasshopper_+15033484670_11_16_2024_223644082.mp3 (95 kb)

IBR Draft SEIS - RECORD #2409 DETAIL

Submission Date : 11/16/2024
First Name : N/A
Last Name : N/A
Business/Organization/Agency :

Submission Input :

New Grasshopper Voicemail

Caller: [redacted]
Extension: 701 - SEIS - English Translation
Grasshopper #: (866) 427-7347
Timestamp: 11/16/2024 2:36:09 PM (UTC-08:00) Pacific Time (US & Canada)

Read Your Voicemail"All drafts need to have no tolls, no light rail, and no more added crime from Portland.Let's make sure that there's at least five lanes on each side, so a 10-lane bridge.Again, no tolls, no light rail.All of that is more Portland ****.Let's keep Portland out of Vancouver.Have a great day.Bye now."
Play this voicemail on your mobile phone or online

Sign in to your account

Find us on Twitter & Facebook

Love Grasshopper? Tell a Friend & spread the word!

IBR Draft SEIS - RECORD #2410 DETAIL

First Name :	Chris
Last Name :	Eykamp
Attachments :	DSEIS-2410_Eykamp_Original.pdf (11 kb)

IBR Draft SEIS - RECORD #2410 DETAIL

Submission Date : 11/16/2024
First Name : Chris
Last Name : Eykamp
Business/Organization/Agency :

Submission Input :

First Name:
Chris

Last Name:
Eykamp

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
Funding Risk

* The Draft SEIS assumes that the Program will be funded through a combination of federal, state, and local sources, as well as tolls. However, the document does not provide a detailed funding plan or discuss the potential for cost overruns, which we know occur in almost all projects of this size and complexity. The document should include a fully developed funding plan and identify strategies for mitigating financial risks in the event of cost overruns or other unforseen events.

Bicycle Access

* The Draft SEIS acknowledges that "most survey respondents (72 percent) identified improving travel times as a top priority" when considering the river crossing, but does not adequately address concerns about bicycle and pedestrian access. While the document mentions a separated shared-use path (SUP) on the river crossing, it should provide more detail on how the Program will ensure safe and convenient bicycle and pedestrian access throughout the corridor.

* The Draft SEIS states that the shared-use path will meet Americans with Disabilities Act standards, meaning a grade less than or equal to 5%. However, the fixed-span bridge configurations would place the shared-use path at a height of 116 feet. This height would necessitate a long, steep climb for cyclists, potentially discouraging bicycle use and creating accessibility challenges for some users. The Program should consider options for reducing the grade further, such as a longer, less steep path or a bicycle elevator.

* The Draft SEIS states that the IBR Program has committed to providing the same or greater vertical clearance for the Oregon Slough Bridge than is currently offered. This would result in a minimum vertical clearance of 35 feet. This height raises similar concerns about accessibility for cyclists and pedestrians. The Program should explore design options that minimize the grade on both the Oregon Slough and Columbia River crossings to ensure that the SUP is accessible to all users.

* The Draft SEIS fails to adequately address the potential for bridge openings to disrupt bicycle and pedestrian traffic on the single-level movable-span configuration. The document mentions the possibility of limiting openings to nighttime hours, but this may not be feasible or desirable. The Program should provide a more detailed analysis of the potential impacts of bridge openings on bicycle and pedestrian traffic and develop mitigation measures to minimize these impacts.

Climate Issues

* While the Draft SEIS discusses the project's climate framework, including a goal of reducing greenhouse gas emissions, it does not adequately address the potential for induced demand to increase emissions. Induced demand can lead to more vehicles on the road, offsetting any emissions reductions achieved through improved vehicle efficiency or mode shift. The Program should explicitly address induced demand in its climate analysis and explore strategies to mitigate its impact.

* The Draft SEIS does not adequately account for the potential for induced demand, which is the phenomenon of increased traffic volume in response to increased roadway capacity. If planners believe there will be no induced demand, that assumption should be made explicit and be fully justified. Otherwise, a range of scenarios for induced demand should be included in the modeling and analysis.

* The Draft SEIS acknowledges the need for climate change adaptation, particularly in light of sea-level rise and more frequent extreme weather events. However, it should provide more specific details on how the project will be designed and constructed to withstand these challenges. This should include considerations such as the selection of durable materials, the design of stormwater management systems, and the elevation of critical infrastructure.

* The Draft SEIS should expa Andnd its discussion of embodied carbon, which refers to the emissions associated with the production, transportation, and installation of construction materials. The document mentions the use of low-carbon concrete and asphalt as a potential mitigation measure, but should provide a more comprehensive assessment of the project's embodied carbon footprint. This assessment should include an inventory of materials used and an analysis of strategies to reduce embodied carbon, such as material reuse and the selection of low-impact materials.

Lack of Smaller, Less Impactful Options in the IBR Program

There is limited discussion of smaller, less impactful alternatives, potentially raising concerns about a lack of comprehensive consideration for minimizing the program's footprint and its associated consequences.

Project documents consistently emphasize options that involve substantial construction and modification of existing infrastructure. For example, the primary bridge replacement options involve either a double-deck or single-level fixed-span bridge, both requiring significant alterations to the surrounding roadway network.

Alternative options are quickly dismissed as inadequate for addressing the program's stated Purpose and Need, which emphasizes improving traffic flow and accommodating future growth. This raises the question of whether a broader range of alternatives, potentially incorporating elements of TSM/TDM or focusing on more localized improvements, were adequately explored.

The emphasis on capacity expansion, often linked to the concept of induced demand, might overshadow the potential for implementing demand management strategies to moderate traffic growth and reduce the need for large-scale infrastructure projects.

There is limited discussion of whether smaller-scale, less impactful improvements, such as targeted intersection upgrades, signal optimization, or pedestrian/bicycle infrastructure enhancements could effectively address some of the program's objectives without resorting to large-scale interventions.

There is also limited analysis about whether a simple bridge replacement without the capacity expansion and associated highway work could be acceptable when linked to user fees or other TDM strategies.

The lack of emphasis on smaller, less impactful options suggests a potential for overlooking community concerns regarding construction disruptions, property acquisitions, and environmental impacts. By primarily focusing on large-scale interventions, the program might miss opportunities to address specific community needs through more tailored and localized solutions.

The current emphasis on large-scale interventions raises the need for a more thorough exploration of smaller, less impactful options to ensure that the program's final decisions align with principles of sustainability and community engagement.

JCA comment #: 498

IBR Draft SEIS - RECORD #2411 DETAIL

First Name :	Scott
Last Name :	Kelly
Attachments :	DSEIS-2411_Kelly_Original.pdf (6 kb)

IBR Draft SEIS - RECORD #2411 DETAIL

Submission Date : 11/16/2024
First Name : Scott
Last Name : Kelly
Business/Organization/Agency :

Submission Input :

First Name:
Scott

Last Name:
Kelly

Email:
[redacted]

Topic Area:
Induced Demand

Comment:
I have reviewed the SDEIS and the Marshall Report which concludes that the traffic modeling used in the SDEIS doesn't accurately project future traffic. I believe the traffic modeling used in the SDEIS will result in over-building the bridge, unnecessary costs, increased traffic demand, and increased carbon emissions. These results are counter to both Oregon and Washington climate impact goals and policies. I strongly urge the IBR team to revisit and revise the traffic modeling for the project to address these deficiencies.

JCA comment #: 497

IBR Draft SEIS - RECORD #2412 DETAIL

First Name :	lynn
Last Name :	handlin
Attachments :	DSEIS-2412_Handlin_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #2412 DETAIL

Submission Date : 11/16/2024
First Name : lynn
Last Name : handlin
Business/Organization/Agency :

Submission Input :

First Name:
lynn

Last Name:
handlin

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
THE IBR must be streamlined. There needs to be much better mass transit. It needs to be far more pedestrian and bike friendly. We need a bridge replacement, not a bridge replacement that includes extensive freeway expansion. Widening the freeway may reduce congestion for a brief while but as you all know, due to induced demand that relief will be short lived. And, why are you considering widening the freeway to shorten the commute for some people by a a few minutes at the expense of our children's livable future? Why are shorter

commute times, in the short term, more important than lower emissions and fewer traffic deaths? We need a streamlined IBR, not the proposed overpriced, oversized project.

JCA comment #: 496

IBR Draft SEIS - RECORD #2413 DETAIL

First Name :	Sam
Last Name :	Friedenberg
Attachments :	DSEIS-2413_Friedenberg_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #2413 DETAIL

Submission Date : 11/16/2024
First Name : Sam
Last Name : Friedenberg
Business/Organization/Agency :

Submission Input :

First Name:
Sam

Last Name:
Friedenberg

Business or Organization:
None

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
Friends:

Both the Columbia Crossing and current IBR iterations strike me as largely devoid of common sense. Particular issues are:

1. The new bridge and connected egress and exit ramps stand as massive monuments to concrete. Wide, many, enormous, winding and more. I would suggest fewer, shorter and simpler entrance and exit points.

2. Pedestrian and bicycle ways need to be physically separate from vehicle and rail lanes, on the side and not in the middle (as with the Glenn Jackson bridge) and with lower access grades.

3. There should be no more than four lanes in each direction. Do not tag on wide and multiple lane access roads. There is no denying that the more lanes you had the more traffic you bring, reducing travel time. Please do not ignore induce traffic models.

4. Any compromise to use and convenience of light rail or buses should be discarded. We need to promote these forms of transportation and not prioritize automobiles.

Thank you,

Sam Friedenberg
NE Portland

Thank you.

JCA comment #: 495

IBR Draft SEIS - RECORD #2414 DETAIL

First Name :	Pablo
Last Name :	Martos
Attachments :	DSEIS-2414_Martos_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #2414 DETAIL

Submission Date : 11/16/2024
First Name : Pablo
Last Name : Martos
Business/Organization/Agency :

Submission Input :

First Name:
Pablo

Last Name:
Martos

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Climate Change

Comment:
We need to emphasize public transit and the Multi-Use pathway. We need to induce demand for non-automobile crossing. Climate change is an existential threat, and even if everybody could afford to replace their standard internal combustion engines with electrical vehicles, there are still a million other pollution problems from automobiles, including brake dust, drippings of Grease, tire wear particles and the resulting Urban runoff mortality syndrome for coho salmon, not to mention all of the externalities and problems and costs that result

from the urban sprawl and other infrastructure built around oversized single occupancy vehicles.

In emphasizing Transit and multi-use paths, Transit and the multi-use path should be next to each other, with the transit between vehicles and non-vehicle users, for seamless transfers, ease of use, and safety. Path users should have convenient access to transit elevators, especially at elevated stations.

JCA comment #: 494

IBR Draft SEIS - RECORD #2415 DETAIL

First Name :	Max
Last Name :	Ramsey
Attachments :	DSEIS-2415_Ramsey_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #2415 DETAIL

Submission Date : 11/16/2024
First Name : Max
Last Name : Ramsey
Business/Organization/Agency :

Submission Input :

First Name:
Max

Last Name:
Ramsey

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
ADD VEHICLE TOLLING:
Tolls will inevitably suppress demand for driving, encourage more transit usage and cycling alternatives (if their routes are safe and not overly inconvenient).
- TOLL CHARGES PRICED TO COVER MAINTENANCE AND FUND REDUCED-FARE TRANSIT PROGRAMS.
- Multi-use PATH USERS DO NOT PAY TOLLS.
- IMPLEMENT DISCOUNT PROGRAMS to ensure equity. Starting day one of tolling, have a LOW-INCOME DISCOUNT program (database built including out-of-state programs), and LOCAL-RESIDENT DISCOUNT (eg., homeowners or renters who live within 0.5 miles of freeway, issued a discount card).

JCA comment #: 493

IBR Draft SEIS - RECORD #2416 DETAIL

First Name :	Max
Last Name :	Ramsey
Attachments :	DSEIS-2416_Ramsey_Original.pdf (10 kb)

IBR Draft SEIS - RECORD #2416 DETAIL

Submission Date : 11/16/2024
First Name : Max
Last Name : Ramsey
Business/Organization/Agency :

Submission Input :

First Name:
Max

Last Name:
Ramsey

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Induced Demand

Comment:
Firstly, i personally vote NO to the FREEWAY EXPANSION part of this project The committees (Portland and Vancouver together) HAVE DONE NOTHING TO DATE, TO ACTIVELY REDUCE EXISTING TRAFFIC VOLUME!

Please GO BACK TO THE PROJECT DRAWING BOARD and this time, PRIORITIZE TRANSIT & CYCLING ENHANCEMENTS WITH ONLY THE BRIDGE-REPLACEMENT, no lane expansions.

The #1 priority should be FOCUS ON REDUCING PERSONAL-USE VEHICLE VOLUMES!

Allowing for increased traffic, under any scenario, poses serious health risks for many living within several miles and exacerbates negative outcomes for our sister cities and states overall. Reducing volume, simply reduces the negative Health Concerns of local residents.

You can achieve the goals by:

A) MAKING TRANSIT MORE CONVENIENT & AFFORDABLE, THAN DRIVING.

- BUILD SPEEDRAIL or have four-car Max trains
- Allow for multi-lane Bus Rapid Transit
- Prices need to be kept affordable! (cheaper than the cost of gas/parking). Fund price reductions by other State or federal programs.
- Create marketing campaigns around Low-Income prices and employer reimbursement programs.
- Get creative with promotions, like “7 day free Commuter trials” and ways to encourage usage by free rides on special days, such as getting Vancouverits to “First Thursday Free Day” or Portlanders to go to “Vancouver Days” as ideas.

B) DESIGNING SAFE and CONVENIENT CYCLING/PEDESTRIAN MULTI-USE PATH, prioritizing the convenience, safety and NOISE PROTECTIONS, over vehicles.

- TRANSIT & MULTI-USE PATH should be next to each other — not separated by a half-mile ramp and 10+ freeway lanes.
- POSITION DESIGNATED TRANSIT LANES TO BUFFER PATH. This will reduce noise, debris, and enhance user safety. (The 205 multi-use path is the Worst example, pebbles being flung by tires at 60-70 miles per hour, hitting cyclists as they ride in the middle. Whoever designed that should have to live there for a month! Its horrible horrible horrible, go watch Youtube video!)
* CONVENIENT ACCESS TO TRANSIT ELEVATORS, especially at elevated stations… making extra consideration for Disabled.
* PATH WIDTH AND TURNS ACCOMMODATE THE GROWING LARGER CARGO BIKE COMMUNITY. These types of bikes truly can keep cars off the road and should be given higher priority than a car.
* On VANCOUVER SIDE: The path should extend to Evergreen, to prevent the need for using a ridiculous 100-foot high spiral… again, not designed by someone who cycles. WHAT WERE YOU THINKING?!!!
* On PORTLAND SIDE: Add bullard protected greenway connections to the N.Vancouver/Williams corridor, in addition to the planned Kenton/Denver link.

C) ADDING VEHICLE TOLLING:
Tolls will inevitably suppress demand for driving, encourage more transit usage and cycling alternatives (if their routes are safe and not overly inconvenient).
- PRICED TO COVER MAINTENANCE AND FUND REDUCED FARE TRANSIT PROGRAMS.
- Multi-use PATH USERS DO NOT PAY TOLLS.
- IMPLEMENT DISCOUNT PROGRAMS to ensure equity. Starting day one of tolling, have a LOW-INCOME DISCOUNT program (database built including out-of-state programs), and LOCAL-RESIDENT DISCOUNT (eg., homeowners or renters who live within 0.5 miles of freeway, issued a discount card).

JCA comment #: 492

IBR Draft SEIS - RECORD #2417 DETAIL

First Name :	Max
Last Name :	Ramsey
Attachments :	DSEIS-2417_Ramsey_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #2417 DETAIL

Submission Date : 11/16/2024
First Name : Max
Last Name : Ramsey
Business/Organization/Agency :

Submission Input :

First Name:
Max

Last Name:
Ramsey

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Ecosystems

Comment:
We need an ENVIRONMENTAL IMPACT STATEMENT (SDEIS) using INDUCED DEMAND TRAFFIC MODELING, so the environmental (and health) impact assessment is BASED ON FUTURE TRAFFIC, not existing.

JCA comment #: 491

IBR Draft SEIS - RECORD #2418 DETAIL

First Name :	Max
Last Name :	Ramsey
Attachments :	DSEIS-2418_Ramsey_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #2418 DETAIL

Submission Date : 11/16/2024
First Name : Max
Last Name : Ramsey
Business/Organization/Agency :

Submission Input :

First Name:
Max

Last Name:
Ramsey

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Noise and Vibration

Comment:
- POSITION DESIGNATED TRANSIT LANES TO BUFFER MULTI-USE PATH. This will reduce noise, debris, and enhance user safety.

(The 205 multi-use path is the Worst example, not only by the lane position but how pebbles are flung by tires at 60-70 miles per hour, hitting cyclists as they ride. Whoever designed that should have to live there for a month! Its horrible horrible horrible, go watch Youtube video!)

JCA comment #: 490

IBR Draft SEIS - RECORD #2419 DETAIL

First Name :	Max
Last Name :	Ramsey
Attachments :	DSEIS-2419_Ramsey_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #2419 DETAIL

Submission Date : 11/16/2024
First Name : Max
Last Name : Ramsey
Business/Organization/Agency :

Submission Input :

First Name:
Max

Last Name:
Ramsey

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Air Quality

Comment:
I have asthma, live within 1/2 mile of 1-5 and already suffer when the wind stops blowing. Allowing for increased traffic, under any scenario, poses serious health risks for many living within several miles of both our sister cities. Reducing volume, is key to improving air quality, and reducing the negative Health impact of local residents.

Please get a BETTER ENVIRONMENTAL IMPACT STATEMENT (SDEIS) done, using INDUCED DEMAND TRAFFIC MODELING, so the health impact assessment is BASED ON FUTURE TRAFFIC, not existing.

We need to NOT expand the lanes, but instead focus on improving transit and cycling so people have better

reasons to stop driving.

JCA comment #: 489

IBR Draft SEIS - RECORD #2420 DETAIL

First Name :	Max
Last Name :	Ramsey
Attachments :	DSEIS-2420_Ramsey_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #2420 DETAIL

Submission Date : 11/16/2024
First Name : Max
Last Name : Ramsey
Business/Organization/Agency :

Submission Input :

First Name:
Max

Last Name:
Ramsey

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Neighborhoods and Equity

Comment:
Please GO BACK TO THE PROJECT DRAWING BOARD and this time, prioritize improving transit and path enhancements WITH ONLY THE BRIDGE-REPLACEMENT, no lane expansions.

Because if you do build more lanes, you need to HIGHLY COMPENSATE miles and miles of nearby residents who live within a mile of the freeway, for their health impact. Portland has gone far too long with impacting this community. It's time to pay up big!

JCA comment #: 488

IBR Draft SEIS - RECORD #2421 DETAIL

First Name :	Max
Last Name :	Ramsey
Attachments :	DSEIS-2421_Ramsey_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #2421 DETAIL

Submission Date : 11/16/2024
First Name : Max
Last Name : Ramsey
Business/Organization/Agency :

Submission Input :

First Name:
Max

Last Name:
Ramsey

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Other

Comment:
DESIGNING SAFE and CONVENIENT MULTI-USE PATH, prioritizing the convenience, safety and NOISE PROTECTIONS of pedestrians and cyclists, over vehicles.
- Multi-use PATH USERS DO NOT PAY TOLLS.
- Design TRANSIT & MULTI-USE PATH next to each other — not separated by a half-mile ramp and 10+ freeway lanes.
- POSITION DESIGNATED TRANSIT LANES TO BUFFER PATH. This will reduce noise, debris, and enhance user safety. (The 205 multi-use path is the Worst example, pebbles being flung by tires at 60-70 miles per hour, hitting cyclists as they ride in the middle. Whoever designed that should have to live there for a month! Its horrible horrible horrible, go watch Youtube video!)

* CONVENIENT ACCESS TO TRANSIT ELEVATORS, especially at elevated stations…
* Make EXTRA CONSIDERATION FOR DISABLED with pathways, route and turns. It should be MORE convenient. Do not make them push their wheelchairs further, just to make it more convenient for cars! Dont make them ride into the street, to go up on ramp.
* WIDER PATHS AND TURNS to accommodate disabled and growing community of LARGER CARGO BIKES. These types of bikes truly replace the need to drive cars, and should be given higher priority than a car.
* On VANCOUVER SIDE: The path should extend to Evergreen, to prevent the need for using a ridiculous 100-foot high spiral… again, not designed by someone who cycles. WHAT WERE YOU THINKING?!!!
* On PORTLAND SIDE: Add bullard protected greenway connections to the N.Vancouver/Williams corridor, in addition to the planned Kenton/Denver link.

JCA comment #: 487

IBR Draft SEIS - RECORD #2422 DETAIL

First Name :	Max
Last Name :	Ramsey
Attachments :	DSEIS-2422_Ramsey_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #2422 DETAIL

Submission Date : 11/16/2024
First Name : Max
Last Name : Ramsey
Business/Organization/Agency :

Submission Input :

First Name:
Max

Last Name:
Ramsey

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Public Services and Utilities

Comment:
FIND FUNDING - TO MAKE TRANSIT FASTER, MORE CONVENIENT & AFFORDABLE, THAN DRIVING.
- BUILD SPEEDRAIL or have four-car MAX trains, to get more people to places faster than car traffic.
- Allow for a multi-lane Bus Rapid Transit
- Bridge Tolls fund supplemental pricing so transit prices are kept affordable! It must be cheaper than the cost of gas/parking.
- Make taking transit less confusing, especially with transfers. Make ticketing & pricing for Train, Bus, and Streetcar aligned under one pricing model. No longer should there be three tickets to transfer from the bus to Max to streetcar; it should be one ticket.
- Create marketing campaigns around Low-Income prices and employer reimbursement programs.

- Get creative with promotions, like “7 day free Commuter trials” and ways to encourage usage by free rides on special days, such as getting Vancouverits to “First Thursday Free Day” or Portlanders to go to “Vancouver Days” as ideas.

JCA comment #: 486

IBR Draft SEIS - RECORD #2423 DETAIL

First Name :	Blake
Last Name :	Goud
Attachments :	DSEIS-2423_Goud_Original.pdf (9 kb)

IBR Draft SEIS - RECORD #2423 DETAIL

Submission Date : 11/16/2024
First Name : Blake
Last Name : Goud
Business/Organization/Agency :

Submission Input :

First Name:
Blake

Last Name:
Goud

Business or Organization:

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Cumulative Effects

Comment:
The project as it is currently designed is ill conceived from multiple angles. These include:

- By overestimating demand growth since the conception of the project, it has been designed to expand the highway too much.
- Economic modeling frequently underestimates the price elasticity of demand which means much of the demand management can be accomplished by tolling alone on a bridge or tunnel the same size as today.
- The Coast Guard is unlikely to accede to the plans for a fixed span bridge without enough height. However reaching that height with the planned widening will blight Hayden Island and Vancouver's downtown and emerging waterfront area.
- The plans for light rail on the opposite side of the highway from bike and walk facilities will disadvantage those users unnecessarily since they are complementary (multi-modal doesn't mean taking a long winding ramp down, crossing under a highway and then taking an elevator back up).
- The existing project dtaff are hopelessly conflicted and unable to overcome their private interests (conflicts of interest related for example to past and potential future employment with contractors regardless of whether the project is built that cannot be mitigated purely by disclosure of these conflicts).
- This project will never be funded the way it is designed and ultimately that is likely to come at the cost of the parts of the project that are aligned with Oregon and Washington's climate targets.

This project does far more than replace a bridge. It is a 5 mile widening of a highway that has been demonstrated to not address congestion because of other bottlenecks and induced demand. It will adversely impact adjacent neighborhoods in 2 states as well as contributing to climate.

The bridge needs to be replaced but we should maintain existing structures for walk, bike and transit and go with an immersed tunnel for private vehicles the same dimensions as today and tolling to improve land use allocation and speed up approval by the Coast Guard before costs escalate further.

JCA comment #: 485

IBR Draft SEIS - RECORD #2424 DETAIL

First Name :	Sarah
Last Name :	Palmer
Attachments :	DSEIS-2424_Palmer_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2424 DETAIL

Submission Date :	11/18/2024
First Name :	Sarah
Last Name :	Palmer
Business/Organization/Agency :	

Submission Input :

I opposed the proposed new exit that would displace multiple residents and businesses. The apartment complex there is one of the most affordable housing options in Vancouver. Demolishing that area for a new ramp would disproportionately affect people who would struggle to get other housing in this area.

IBR Draft SEIS - RECORD #2425 DETAIL

First Name :	Alison
Last Name :	Buttafuoco
Attachments :	DSEIS-2425_Buttafuoco_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #2425 DETAIL

Submission Date : 11/16/2024
First Name : Alison
Last Name : Buttafuoco
Business/Organization/Agency :

Submission Input :

First Name:
Alison

Last Name:
Buttafuoco

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Neighborhoods and Equity

Comment:
The MLPA SEIS draws on traffic models that have failed to predict today's conditions, let alone future demand, and is therefore unrealistic and inappropriate for decision-making. A new, improved SEIS is required. The project's emphasis on handling increased auto/truck traffic is counter to our community's interests, such as our stated climate goals, right to clean air, and need for improved public transit and active transportation to Hayden Island and across the Columbia River. The MLPA risks worsening health outcomes for the already overburdened diverse, lower-income neighborhoods of North Portland. Personally, I cannot afford additional days where the outdoor air is unsafe for sensitive persons to breathe. An equitable solution is necessary.

JCA comment #: 484

IBR Draft SEIS - RECORD #2426 DETAIL

First Name :	Lisa
Last Name :	Caballero
Attachments :	DSEIS-2426_Caballero_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #2426 DETAIL

Submission Date : 11/16/2024
First Name : Lisa
Last Name : Caballero
Business/Organization/Agency :

Submission Input :

First Name:
Lisa

Last Name:
Caballero

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
To whom it may concern,
I just finished reading the Smart Mobility review of the Interstate Bridge Replacement Project DSEIS.
The review is easy-to-understand and thoroughly demonstrates that the IBR DSEIS relies on invalid traffic modeling which 1) mis-assigns the bridge as the cause of I-5 congestion, 2) uses Metro's outdated "static traffic assignment" methodology which wildly overstates future traffic growth (the logical errors of this method are

apparent to even this non-expert) and 3), makes a strong case that I-5 already has the capacity to carry more throughput and suggests auditing the existing ramp metering system to see why it does such a poor job.
In short, the review completely undercuts the justification for this bridge-widening project. I’m angry that IBR has gotten as far along as it has with only this simplistic and erroneous data to support it.
Please right-size this project. Replace the existing bridge with a structure which can better survive an earthquake, and then just stop.

JCA comment #: 483

IBR Draft SEIS - RECORD #2427 DETAIL

First Name :	Adam
Last Name :	Keehn
Attachments :	DSEIS-2427_Keehn_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #2427 DETAIL

Submission Date : 11/16/2024
First Name : Adam
Last Name : Keehn
Business/Organization/Agency :

Submission Input :

First Name:
Adam

Last Name:
Keehn

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
Please ensure excellent user access and a positive transportation experience for people walking, biking, and rolling - We need a bridge that welcomes everyone—walking, biking, and rolling and accessing public transit—by ensuring seamless, accessible pathways without extra distance or difficult grades. By integrating open views, rest areas, and close transit access, the bridge can become a safe, enjoyable route for all.
We need to emphasize the need for protective barriers, well-lit routes, and comfortable features like shading

and rain protection, creating a welcoming space for everyone. A commitment to inclusive design prioritizes the safety and comfort of all ages, abilities, and backgrounds, especially underserved and vulnerable groups.
We want a climate-resilient bridge that supports active and public transportation, reducing reliance on cars and cutting emissions long-term. An environmentally friendly design promotes cleaner, healthier spaces, with natural buffers and materials that help protect public health and the environment.
We can’t afford to continue subsidizing driving above walking, biking, rolling, and using transit. When we advocate for a bridge design that maximizes value with adaptable features, we are supporting future needs without costly retrofits. By building with durable, cost-effective materials and enhancing local access, the bridge can become a sustainable, high-value investment for local businesses, job access, and community development.

JCA comment #: 482

IBR Draft SEIS - RECORD #2428 DETAIL

First Name :	Alison
Last Name :	Buttafuoco
Attachments :	DSEIS-2428_Buttafuoco_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #2428 DETAIL

Submission Date : 11/16/2024
First Name : Alison
Last Name : Buttafuoco
Business/Organization/Agency :

Submission Input :

First Name:
Alison

Last Name:
Buttafuoco

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Induced Demand

Comment:
The proposed bridge width will allow for even more auto lanes than stated, inducing demand and worsening traffic bottlenecks such as that in the Overlook area of North Portland (I-5 / I-405 interchange). A design that is challenging or deterrent to active transportation, combined with no improvement in express-bus travel time, will result in more auto traffic and unmet climate goals. This fails to serve our community's priorities. The proposal is not a bridge replacement but extremely oversized, off-target mega-highway.

JCA comment #: 481

IBR Draft SEIS - RECORD #2429 DETAIL

First Name :	Rachel
Last Name :	Schmerge
Attachments :	DSEIS-2429_Schmerge_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #2429 DETAIL

Submission Date : 11/16/2024
First Name : Rachel
Last Name : Schmerge
Business/Organization/Agency :

Submission Input :

First Name:
Rachel

Last Name:
Schmerge

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
I'd imperative that the planning committee ensures the biking and walking path on the I-5 expansion bridge is thoughtfully designed to maximize accessibility and multimodal connectivity. Specifically, I urge that the biking and walking path be placed on the same side as the transit facilities. This will allow for seamless integration with public transit, making it easier for commuters to combine biking, walking, and transit options. Additionally, I recommend that the path remain elevated all the way to the last transit station at Evergreen Boulevard. This

design will enhance safety, efficiency, and usability for all non-motorized travelers.

JCA comment #: 480

IBR Draft SEIS - RECORD #2430 DETAIL

First Name :	Alison
Last Name :	Buttafuoco
Attachments :	DSEIS-2430_Buttafuoco_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #2430 DETAIL

Submission Date : 11/16/2024
First Name : Alison
Last Name : Buttafuoco
Business/Organization/Agency :

Submission Input :

First Name:
Alison

Last Name:
Buttafuoco

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
The IBR as currently proposed is not a "replacement" but a maximized autos-first megaproject. As designed, it will add vehicle lanes unnecessary for slow predicted growth. The skewed prioritization of autos is clear in the poor facilities proposed for transit and active transportation. Particularly problematic are:
- Extremely elevated transit stations. Elevator outages will leave active transportation users stranded, a particular risk for children, elders, and people with disabilities.
- Lack of direct connection between transit stations and multiuse paths.
- Long grades and 100-foot-rise spiral ramp will challenge and deter some bicyclists and pedestrians.
- Multiuse path users should have easy access to elevators in the proposed design.
- Multiuse path and connections remain difficult and confusing, not meaningfully improved over current

conditions despite proposed improvements to wayfinding.
- Proposal fails to improve express-bus travel times.
IBR must be right-sized to meet climate goals and reflect our community’s priorities.

JCA comment #: 479

IBR Draft SEIS - RECORD #2431 DETAIL

First Name :	Todd
Last Name :	Henion
Attachments :	DSEIS-2431_Henion_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #2431 DETAIL

Submission Date : 11/16/2024
First Name : Todd
Last Name : Henion
Business/Organization/Agency :

Submission Input :

First Name:
Todd

Last Name:
Henion

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
Please use ALL the provided studies and focus your efforts on guiding the region toward less driving, not more. Anything else is violating the climate pledges and science you must use as guidance.
Thank you.

JCA comment #: 478

IBR Draft SEIS - RECORD #2432 DETAIL

First Name :	Tom
Last Name :	Ford
Attachments :	DSEIS-2432_Ford_Original.pdf (9 kb)

IBR Draft SEIS - RECORD #2432 DETAIL

Submission Date : 11/16/2024
First Name : Tom
Last Name : Ford
Business/Organization/Agency :

Submission Input :

First Name:
Tom

Last Name:
Ford

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
My comments are primarily focused on tolling and related impacts.
Our family feels that tolling would put unfair and unsustainable burden on Hayden Island residents. We've only lived on the island two years and have already become de facto Vancouver residents consuming more and more goods and services in WA than our home state. As I often say " its almost like we don't live in Portland anymore, except for the property taxes". Besides obvious logistical advantages, Vancouver is more

convenient, cleaner and safer than Portland!
On average, we travel by car to Vancouver 5 days a week for:
Grocery Store- Fred Meyer on HWY 14
Dentist
Healthcare appointments
Restaurants and bars in downtown
Beauty/Nail spa
Planet Fitness
Examples of basic things Hayden Island lacks
Restaurants
Full service Grocery Store
Drycleaner
Florist
Gym/health club
Barber Shop
Pet/Doggie daycare
Mail shipping service, IE UPS Store
The two lists nearly mirror each other ironically
Our family also uses SR 14 for a better /safer route to the airport and Costco and other items in on the east side of Portland. Our daughter works at the airport and often uses the I5 bridge and SR 14.
Given the dearth of services on Hayden Island, we feel like we have little choice but to either go south into Portland or go north to Vancouver and most of the time we go north! For the goods and services we continue to travel to Portland for, we often face 30-45 minute travel time home, even from local North Portland locations in the 97217 zip code!
Currently, my wife commutes to Swan Island and I work from home however if the the time comes to change employers or lease office space, locations in Vancouver would be much more practical and convenient than Portland. This begs the question; how fair is it for people to pay tolls to gain access to life-sustaining jobs if there are no other alternatives to paying?
In short, tolling puts Hayden Island residents between a rock and hard place with few choices but PAY or MOVE. I continue to have hopes that Hayden Island will one day have more goods and services allowing residents to “stay local” but best case that’s years from now after the replacement bridge is completed. Until that day comes (if ever) Hayden Island residents should be EXEMPT from tolls!
As far as mass transit is concerned, focus on bus, NOT trains to lower costs and promote flexibility. Adding 1/3 higher cost to the bridge for a feature few will use is foolhardy and doesn't serve the public interest.
Best regards,
Tom Ford

JCA comment #: 477

IBR Draft SEIS - RECORD #2433 DETAIL

First Name :	Daniel
Last Name :	Tomicek
Attachments :	DSEIS-2433_Tomicek_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #2433 DETAIL

Submission Date : 11/16/2024
First Name : Daniel
Last Name : Tomicek
Business/Organization/Agency :

Submission Input :

First Name:
Daniel

Last Name:
Tomicek

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
We need to emphasize the need for protective barriers, well-lit routes, and comfortable features like shading for the hotter days with climate change, and rain protection, creating a welcoming space for everyone. A commitment to inclusive design prioritizes the safety and comfort of all ages, abilities, and backgrounds, especially underserved and vulnerable groups. This project is going to shape the next 100 years of transportation in the region. Keep in mind the future where we will be with less cars, more people using transit

and micro-mobility. Please prioritise easy access to any light rail, no giant elevators. And people make it easy for people to walk/bike over without these giant loops.

JCA comment #: 476

IBR Draft SEIS - RECORD #2434 DETAIL

First Name :	James
Last Name :	Gilboy
Attachments :	DSEIS-2434_Gilboy_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #2434 DETAIL

Submission Date : 11/16/2024
First Name : James
Last Name : Gilboy
Business/Organization/Agency :

Submission Input :

First Name:
James

Last Name:
Gilboy

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
Highways are a blight on any urban setting and a relic of obsolete city planning from decades past. No highway through the city should be expanded, only means of public transit or bicycle/pedestrian infrastructure should be invested in. Highways belong at the edges of city, not cutting through their centers like a knife. Don’t let Portland turn into Milwaukee with a hastily expanded highway that ruins neighborhoods and takes an incalculable toll on the local environment.

JCA comment #: 475

IBR Draft SEIS - RECORD #2435 DETAIL

First Name :	Eric
Last Name :	Gold
Attachments :	DSEIS-2435_Gold_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #2435 DETAIL

Submission Date : 11/16/2024
First Name : Eric
Last Name : Gold
Business/Organization/Agency :

Submission Input :

First Name:
Eric

Last Name:
Gold

Business or Organization:
none

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Air Quality

Comment:
We need a new Supplemental Environmental Impact Statement (SDEIS). More car traffic means negative

impacts on the health of people in North Portland. These impacts will disproportionally impact marginalized and working class people.

JCA comment #: 474

IBR Draft SEIS - RECORD #2436 DETAIL

First Name :	Jason
Last Name :	Boursier
Attachments :	DSEIS-2436_Boursier_Original.pdf (765 kb)

IBR Draft SEIS - RECORD #2436 DETAIL

Submission Date :	11/16/2024
First Name :	Jason
Last Name :	Boursier
Business/Organization/Agency :	
Attachments :	Bridge-Replacement.pdf (756 kb)

Submission Input :

First Name:
Jason

Last Name:
Boursier

Business or Organization:
Blue Edgewater

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Hayden Island Issues

Comment:
To Whom It May Concern,

As a resident and business owner on Hayden Island, I am deeply concerned about the proposed I-5 bridge

design and the devastating impact it will have on our community. I live and work here, and I see firsthand how this project will affect the people around me—especially our elderly neighbors, who will bear the brunt of the disruption without seeing much benefit.

The proposed bridge, estimated to cost between an enormous cost and a lengthy timeline, with significant tolls. Despite its massive scale, this project offers very little improvement to the traffic problems on I-5, while causing significant harm to the community.

Here are my key concerns:

Excessive Costs with Minimal Benefits: Spending such an enormous amount on this bridge is difficult to justify, especially when it provides so little relief for our traffic congestion, as indicated by my research and community meetings. It's hard to justify such a cost when the benefits for the community are so limited.

Economic Hardship for Residents: The tolls, that will add up quickly, will create a daily financial burden for everyone, especially our elderly residents who may live on fixed incomes. This added cost will make it harder for people to get to medical appointments, see family, or even go about their daily routines.

Environmental and Safety Risks: The proposed bridge height is significantly lower than the current drawbridge, which will restrict larger commercial vessels from accessing upstream communities. This will hurt businesses that rely on river access. On top of that, the design isn't built to withstand a major earthquake, which puts our entire community at risk—something we simply cannot afford, especially given our vulnerability to the Cascadia Subduction Zone.

Impact on Quality of Life: The proposed interchange for Hayden Island will pave over large parts of our community, creating an unsightly expanse of concrete that cuts through prime retail and residential areas. For elderly residents, this will make navigating the island much more difficult, and the noise and disruption from 15 years of construction will severely impact their quality of life. Property values will drop, businesses will struggle, and our community will be left to deal with the fallout.

Lack of Proper Public Input: The comment period was scheduled during the general election, which feels like a deliberate move to limit public input. We need more time—a much longer period—to properly review and discuss the implications of this project. Additionally, an independent evaluation of alternatives, such as an immersed tunnel, should be conducted. From what I have gathered, a tunnel could be a more practical, less disruptive, and environmentally friendly option.

The current plan feels rushed and doesn't take into account the real needs of the people who live here. We need a solution that not only addresses traffic issues but also protects the well-being of our community—especially our elderly residents who are among the most vulnerable.

Thank you for considering these concerns. I hope the committee will take the time to explore more thoughtful and community-focused alternatives.

Sincerely,

Jason Boursier
Resident and Local Business Employee, Hayden Island

Attachment (maximum one):
Bridge-Replacement.pdf

JCA comment #: 473

I am deeply concerned about the proposed I-5 bridge design
the devastating impact it will have on our community

Please don't ruin the elderly's last years from this misguided pro

IBR Draft SEIS - RECORD #2437 DETAIL

First Name :	Nick
Last Name :	Mediati
Attachments :	DSEIS-2437_Mediati_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #2437 DETAIL

Submission Date : 11/16/2024
First Name : Nick
Last Name : Mediati
Business/Organization/Agency :

Submission Input :

First Name:
Nick

Last Name:
Mediati

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
The proposed bridge as designed is an overbuilt abomination. We don't need more traffic lanes; we need a bridge that will meet the varied needs of our communities--including ample bike/ped infrastructure and light rail.

JCA comment #: 472

IBR Draft SEIS - RECORD #2438 DETAIL

First Name :	Stephen
Last Name :	Frankland
Attachments :	DSEIS-2438_Frankland_Original.pdf (9 kb)

IBR Draft SEIS - RECORD #2438 DETAIL

Submission Date : 11/16/2024
First Name : Stephen
Last Name : Frankland
Business/Organization/Agency :

Submission Input :

First Name:
Stephen

Last Name:
Frankland

Business or Organization:
Agwé Sailing LLC Dba Island Sailing

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Hayden Island Issues

Comment:
As a business owner on Hayden Island, I am deeply concerned about the proposed I-5 bridge design and the

significant impact it will have on our community. After attending the public meeting on October 24th, I have serious reservations about the current plan. The proposed bridge, estimated to cost between $7-12 billion and take 15 years to complete, will include tolls ranging from $3-$15 each way. Despite its massive scale, the project appears to offer minimal improvements to the traffic issues currently affecting I-5.

Here are the key concerns I would like to raise:

Excessive Costs with Limited Benefits: The proposed budget of $7-12 billion is an enormous expenditure, especially considering the limited impact it will have on reducing congestion on I-5. It is difficult to justify such a significant cost for minimal traffic relief.

Economic Burden on the Community: The planned tolls, ranging from $3-$15 each way, will place a considerable financial burden on local residents and businesses. These costs will have a direct impact on daily commuters, employees, and customers, ultimately affecting the economic health of our community.

Environmental and Safety Concerns: The proposed bridge height of 116 feet is 62 feet lower than the current drawbridge, which will restrict access for larger commercial vessels and negatively impact upstream communities. Additionally, the current design lacks sufficient resilience to withstand a major Cascadia Subduction Zone earthquake, which poses a serious safety risk.

Impact on Quality of Life and Business Operations: The proposed 18-lane interchange for Hayden Island will result in a wide, unattractive expanse of pavement that will disrupt prime retail areas, making the island less accessible and appealing for both residents and visitors. The construction period, estimated at 15 years, will significantly disrupt daily life, reduce property values, and negatively impact local businesses.

Insufficient Public Engagement: The limited public comment period, scheduled during the general election, does not provide adequate time for proper community input. I strongly urge an extension of at least 120 days to allow for thorough review and discussion. Furthermore, I recommend exploring alternative options, such as an immersed tunnel, which could be more cost-effective, environmentally friendly, and has been successfully implemented in similar projects.

I urge the committee to reconsider the current proposal and explore more practical and community-friendly alternatives. The current plan seems rushed and does not adequately address the needs or concerns of the residents and businesses on Hayden Island. We need a solution that balances infrastructure improvement with community well-being and economic stability.

Thank you for your attention to these important concerns.

Sincerely,
Stephen Frankland: Owner/Operator Island Sailing School and Club

JCA comment #: 471

IBR Draft SEIS - RECORD #2439 DETAIL

First Name :	Randall
Last Name :	Friesen
Attachments :	DSEIS-2439_Columbia_Pacific_Original_Resized.pdf (915 kb)

Columbia Pacific Building and Construction Trades Council

SEIS Advisory Board Members,

I am writing to you today on behalf of over 20,000 Building Trades Union members in the Portland Metro and SW Washington areas, represented by The Columbia Pacific Building and Construction Trades Council (CPBCTC). The CPBCTC is comprised of 22 local area unions, 3 District Councils of Unions, and 14 International Union Organizations.

Building Trades Union members are the foundation of the construction industry in the region, building the schools, hospitals, and infrastructure that our communities rely on. We are committed to upholding the highest standards of workmanship, safety, fairness, and training opportunities.

The Interstate Bridge Replacement (IBR) is a critical infrastructure proposal that will trigger positive environmental change to all communities in the region. The new bridge will reduce greenhouse gas emissions along I-5 by improving traffic flow, easing congestion, and potentially enabling transit-oriented development. This will lead to lower fuel consumption and fewer vehicle emissions.

Additionally, the new bridge will particularly benefit the next generation of construction professionals who are currently middle school students. With an approximate 10-year timeframe, this project could and will employ thousands of workers and has the possibility and responsibility of providing family-wage jobs and unparalleled training opportunities through Building Trades State Registered Apprenticeship Programs. Over the past several years, State Registered Apprenticeship Programs have made concerted efforts to increase awareness to traditionally underserved communities, increasing opportunities for generational wealth and expanding the middle class. Access to these programs will provide a new base of workers with cutting edge skills related to green energy, giving further environmental benefits to the region.

One of the most effective tools to reach these goals is through collaborative efforts in conjunction with the use of Community Benefit Agreements (CBA) that benefit workers, and minority and women owned businesses that employ those workers. CBA requirements ensure access to family healthcare, family wages and benefits, and high training standards that are committed to safety and quality. Without these agreements there is no assurance all these important community benefits would be met creating a positive environmental impact.

Failing to replace the bridge would harm the communities it serves. Thousands of commuters face daily traffic congestion, impacting their lives and limiting family time.

Lastly, improved transit options will benefit underserved communities by providing better access to jobs, grocery stores, healthcare, and other essential services. Communities most affected by this project should be the ones to benefit the most.

Thank you for your time and consideration,

Randall Friesen

Executive Secretary-Treasurer

Columbia Pacific Building & Construction Trades Council

1001 Molalla Avenue, Suite 207 • Oregon City, OR 97045 • PHONE: 503-774-0546 • FAX: 503-774-2816

IBR Draft SEIS - RECORD #2440 DETAIL

First Name :	Cindy
Last Name :	Anderson
Attachments :	DSEIS_2440_Anderson_Original.pdf (4 kb)

IBR Draft SEIS - RECORD #2440 DETAIL

Submission Date : 11/16/2024
First Name : Cindy
Last Name : Anderson
Business/Organization/Agency :

Submission Input :

First Name:
Cindy

Last Name:
Anderson

Business or Organization:
The Happy Mermaid

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
About the I-5 bridge project… I live and work in the area and use the bridge every day. I see how the bulk of the

problem is how it’s too hard to smoothly merge on! The two entrances at 307 and 308 are what backs the whole city up! All that’s needed is smart merging lanes. I don’t think it needs to be this monstrous! Coming south there’s the same issue with first merge on out of Washington. There’s not enough space and there’s too my h breaking and NOT zipping.

JCA comment #: 470

IBR Draft SEIS - RECORD #2441 DETAIL

First Name :	Sam
Last Name :	Hiller
Attachments :	DSEIS_2441_Hiller_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2441 DETAIL

Submission Date : 11/18/2024
First Name : Sam
Last Name : Hiller
Business/Organization/Agency :

Submission Input :

I'm very encouraged by the progress being made towards an earthquake-resistant and future-proofed interstate bridge. This project is vital for the future of both cities, and the overall wellbeing of the Pacific Northwest corridor.

As it is, the SEIS does a lot right! However, as a student and younger Portland resident, I care far more about the long term environmental impact of the project than I do about individual car transit times.

While some manner of increased capacity seems understandable, time and time again research has borne out that traffic rises to meet capacity, with the only solution being the improvement and provision of alternative modes of transit. I can't wait to ride the new expanded MAX Yellow, but I worry that the current SEIS will end in an all-too common issue with current MAX stops -- bad placement, with inconvenient (and by result, much less used) dropoff points for bikers and pedestrians.

A design with a similar overall structure, but with transit lanes placed closer to bike/walking path and a better connection to the street grid would be a huge and lasting improvement to the area. We're spending a ton on this project, so let's do it right the first time.

IBR Draft SEIS - RECORD #2442 DETAIL

First Name :	Katrina
Last Name :	Scotto di Carlo
Attachments :	DSEIS_2442_ScottdiCarlo_Original.pdf (4 kb)

IBR Draft SEIS - RECORD #2442 DETAIL

Submission Date : 11/16/2024
First Name : Katrina
Last Name : Scotto di Carlo
Business/Organization/Agency :

Submission Input :

First Name:
Katrina

Last Name:
Scotto di Carlo

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
I'd like to make a public comment about the interstate bridge project. In general, I would encourage the plan to be further *centered* around the experience of alternative transportation options (biking, walking, public transit riding).

Some specifics… the transit and the multi-use path should be next to each other, for seamless transfers and

ease of use. Path users should have convenient access to transit elevators, especially at elevated stations.

Positioning transit lanes as buffers between the multi-use path and vehicle lanes can reduce noise, debris, and enhance user safety.

Vancouver: The path should extend to Evergreen to prevent the need for using a 100-foot high spiral.

Portland: Add connections to the popular Vancouver/Williams corridor in addition to the planned Kenton/Denver Ave.

Thank you!

JCA comment #: 469

IBR Draft SEIS - RECORD #2443 DETAIL

First Name :	Emma
Last Name :	Nordlund
Attachments :	DSEIS_2443_Nordlund_Original.pdf (4 kb)

IBR Draft SEIS - RECORD #2443 DETAIL

Submission Date : 11/16/2024
First Name : Emma
Last Name : Nordlund
Business/Organization/Agency :

Submission Input :

First Name:
Emma

Last Name:
Nordlund

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
The elevation of the multi-use path crossing the Columbia River does not promote accessibility to those who cross the bridge via active transport at the Vancouver access point. The steep spiral design is a significant barrier and is ableist in design. If the multi-use path cannot be lowered, then robust, well-maintained elevators need to be made available as a primary, reliable option for active transportation users. This elevator could be shared with transit users, which would eliminate the need for additional infrastructure, making the design more

efficient and accessible to users of multiple transportation modes. Additionally, I would like to see the active transportation route extended north so that users would not have to descend to the waterfront and then climb back up to reach the city center. Ideally, the active transportation route should extend to the "community connector" at Evergreen station, or even further north to allow transit users a fair share of the project.

JCA comment #: 468

IBR Draft SEIS - RECORD #2444 DETAIL

First Name :	Pat
Last Name :	Kaczmarek
Attachments :	DSEIS_2444_Kaczmarek_Original.pdf (39 kb)

IBR Draft SEIS - RECORD #2444 DETAIL

Submission Date : 11/16/2024
First Name : Pat
Last Name : Kaczmarek
Business/Organization/Agency :

Submission Input :

First Name:
Pat

Last Name:
Kaczmarek

Business or Organization:
[redacted]

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Climate Change

Comment:

The bridge needs upgrades for earthquake resilience, but The SDEIS does not provide sufficient justification for a second auxiliary lane.

Prioritizing a streamlined project focused on bridge reinforcement, mass transit, and active transportation—without extensive freeway expansion—would be more beneficial and cost-effective.

Let's use limited resources for safety and the most efficient transportation options (ie. mass transit), not private vehicles.

JCA comment #: 467

IBR Draft SEIS - RECORD #2445 DETAIL

First Name :	Jennifer
Last Name :	Haberer
Attachments :	DSEIS-2445_Haberer_Original.pdf (7 kb) Blank-229.pages (291 kb)

IBR Draft SEIS - RECORD #2445 DETAIL

Submission Date : 11/16/2024
First Name : Jennifer
Last Name : Haberer
Business/Organization/Agency :

Submission Input :

First Name:
Jennifer

Last Name:
Haberer

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
Why I disagree with thr Interstate bridge!

Attachment (maximum one):

Blank-229.pages

JCA comment #: 466

IBR Draft SEIS - RECORD #2446 DETAIL

First Name :	alex
Last Name :	Gray
Attachments :	DSEIS_2446_Gray_Original.pdf (35 kb)

IBR Draft SEIS - RECORD #2446 DETAIL

Submission Date : 11/16/2024
First Name : alex
Last Name : Gray
Business/Organization/Agency :

Submission Input :

First Name:
alex

Last Name:
Gray

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Topic Area:
Transportation

Comment:
studies short expanding a freeway does not reduce traffic congestion, it makes it worse.

JCA comment #: 465

IBR Draft SEIS - RECORD #2447 DETAIL

First Name :	William
Last Name :	C Danielson
Attachments :	DSEIS_2447_Danielson_Original.pdf (4 kb)

IBR Draft SEIS - RECORD #2447 DETAIL

Submission Date : 11/16/2024
First Name : William
Last Name : C Danielson
Business/Organization/Agency :

Submission Input :

First Name:
William C

Last Name:
Danielson

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
We want the current I5 drawbridge to be left alone to STAND AS IS in favor of building the THIRD BRIDGE NOW proposal adjacent to the railroad bridge to the west of I5! The proposed new bridge is not the answer to any of our current desires, concerns, or problems, furthermore it will not be able to address any of them in the future. It will however bring an OCEAN WAVE of CRIME and DRUGS to Hayden Island and Vancouver. Please contact me for elaboration. (November 15, 2024)

JCA comment #: 464

IBR Draft SEIS - RECORD #2448 DETAIL

First Name :	Mike
Last Name :	Bomar
Attachments :	DSEIS-2448_Port of Vancouver_Original.pdf (716 kb) outlooksignature_ed0b0dec-9197-48af-93e2-4180bf855356.png (6 kb) linkedin32x32_3509051a-3291-4184-93a9-567900d2cef4.png (338 bytes) facebook32x32_cbab036d-7537-4a4f-95f0-a8e5928e60aa.png (5 kb) instagram32x32_1d3f79df-af18-4628-83fb-ed087d41abc2.png (611 bytes) youtube32x32_bfb02d0c-60d8-462e-a225-984288c08e63.png (5 kb) 241115POVSDEISLetterFINAL.pdf (721 kb)

Port of Vancouver USA

November 15th, 2024

Interstate Bridge Replacement Program
Attn: Greg Johnson, Program Administrator
500 Broadway, Suite 200
Vancouver, WA 98660

RE: Port of Vancouver USA Comments on the Interstate Bridge Replacement Program Draft Supplemental Environmental Impact Statement

Administrator Johnson,

Congratulations on the milestone of releasing the Supplemental Draft Environmental Impact Statement for public comment. The Port of Vancouver USA appreciates the tremendous work that has been done to reach this point and to advance the efforts to successfully complete the Interstate Bridge Replacement Program (IBRP).

The purpose of this letter is to acknowledge the Port of Vancouver USA's support for advancing the project to a Final Supplemental Environmental Impact Statement (FSEIS), to assess the IBRP's response to the twelve conditions listed in the Port's Resolution 3-2022, to support the Modified Locally Preferred Alternative (MLPA), and to express the port's initial preferences and considerations as the program moves toward final design.

In its 2022 resolution supporting the MLPA, the port included twelve conditions of approval that needed to be addressed as the project team moved to the release of the SDEIS. The following is an assessment of each of the conditions and the response from the project team to date:

1. Study the performance of both one and two auxiliary lanes to identify a final design which maximizes safety and efficiency of freight and general-purpose traffic through the bridge influence area, including but not limited to consideration of High, Wide, and Heavy freight needs.

    a. The project team studied the performance of both one and two auxiliary lanes throughout the program area. The port requests that, if the project only includes one auxiliary lane in each direction, to consider design, technological and other methods to reduce the congestion time and length, particularly for the northbound lanes, and to do the same for potential safety improvements. Whether one or two

auxiliary lanes are selected, adequate shoulders on both sides and other safety measures must not be compromised.

2. Provide adequate safety shoulders on both sides of the freeway for both Northbound and Southbound lanes to maximize safety, sufficient emergency access, and reliability through the corridor.

    a. This condition has been met and needs to be maintained throughout the final design process.

3. Accommodate High, Wide, Heavy, and Long (up to 80 meters) freight movements at the Mill Plain Interchange and provide unencumbered connections to key trade routes for the region.

    a. The project team has worked with the port on these issues and the port requests continued coordination to ensure that high, wide and heavy cargo can safely move through this project area. The port specifically requests that the Mill Plain Interchange accommodate northbound turns from Mill Plain to I-5 of at least 100 meters (turning radius) to accommodate wind farm shipments (I-5 to SR-500 to I-205). Additionally, new bridges should accommodate high wide and heavy freight and as such any toll gantries should be at least 25 feet above the roadway allowing for freight to move under them.

4. Compliment and support the goals and actions listed in the Port of Vancouver's Climate Action Plan Project in Greenhouse Gas (GHG) reduction efforts. Minimize idling of freight and general-purpose traffic.

    a. The port supports the additional focus on Climate Change listed in Section 3.19 of the SDEIS. Consider including the Port of Vancouver's Climate Action Plan (https://www.portvanusa.com/environmental-services/climate-action-plan/) in the Final Environmental Impact Statement (FEIS) as further evidence of strong political support for climate action and established citywide policies to address the impacts of climate change for their communities.
    b. Ensure the final design improves capacity for freight and reduces freight and general –purpose traffic congestion to minimize the environmental impacts of idling.

5. Include a high-capacity transit station near Terminal 1 with multimodal access, designed and operated in a manner which maximizes safety and accessibility.

    a. The port supports the work that has been done to date to include a High-Capacity Transit Station near the Vancouver Waterfront while avoiding or minimizing direct impacts to the port's Terminal 1 properties. We look forward to working with the IBRP team to advance a design that is safe, accessible, and maximizes multi-modal opportunities for commuters and other users of the facility.

6. Continue to solicit feedback from the port and Terminal 1 stakeholders to ensure the final design compliments and avoids negative impacts to existing and proposed developments on that site.

    a. The port appreciates the focus on avoiding or mitigating impacts to the Terminal 1 Master-Planned Development adjacent to the project area. The port team will continue to work with the IBR team and contractors to advance a design that respects the following:

        i. Impacts to the newly developed office towers should be avoided. Access to the building hosting thousands of jobs must be maintained throughout construction of the IBRP. The port appreciates the commitments from the project to establish a hotline for noise complaints as well as vibration monitoring throughout the project (Section 3.11). Specifically, the port anticipates the following parcels will be impacted:
            1. Office Towers at T1 Combined Lot 7 - 330 W Columbia Way, Vancouver, WA; APN: 986049316 (land)/986067459 (building) (construction complete)
            2. AC by Marriott Hotel at T1 Lot 3 - 333 W Columbia Way, Vancouver, WA; APN: 986049313 (land)/986061511 (Bldg) (construction complete)
            3. Tract H at Terminal 1 - No Situs Address; APN: 986049326 used as walkways for Vancouver Waterfront, serving AC by Marriott Hotel and Port's adjacent parcel T1 Lot 4 (255 W Columbia Way, Vancouver, WA; APN: 48843000)
            4. T1 Adj Lot 1 currently under development/leased by BOZ Port Block 1 Owner LLC - 440 W Columbia Way, Vancouver, WA; APN: 986049311 (land)/986067977 (building)
            5. Other port-owned parcels at Terminal 1 are likely to be impacted as well.

        ii. Design elements of the project should improve multi-modal accessibility to the Terminal 1 and Vancouver Waterfront sites.

        iii. Park and rides should be minimized or located to avoid additional congestion and safety issues for those accessing Terminal 1 and waterfront areas.

        iv. The IBRP should be designed to ensure that the Terminal 1 vision of public access, affordability and enjoyment can be maintained through the viable construction of a Public Market and associated infrastructure at the site. Specifically, east access to the site, continuation of the Renaissance Trail and required parking is essential for the success of the Public Market.

        v. Impacts from Pier 7 should be minimized. Unavoidable impacts to the dock or associated infrastructure must be fully mitigated, and the port must be adequately compensated for such impacts. The IBR Right of Way and Agreements Team should work to identify a mutually agreeable solution as a top priority as the port is moving forward with contracting for the dock replacement project in December of 2024.

vi. In-water structures should be placed and designed as to minimize dock footprint impacts and negative impacts to the visual aesthetic from Terminal 1 users as well as to avoid negative impacts to river cruise and similar anticipated water users of the Terminal 1 Dock.

vii. The port's in-water assets must be protected from river debris during and after construction.

viii. The IBR team must work with the port to redesign the area known as the East Portal to ensure no loss of function and to address the mutual needs of both parties at that location. The IBR team will be responsible for the relocation of the Boat of Discovery art installation in the East Portal area.

ix. The IBRP design including Piers 8, 7.5 and 7 and corresponding superstructure should avoid or minimize impacts to Terminal 1 Lot 5 (211 W Columbia Way, Vancouver, WA; APN 986049314) and Terminal 1 Lot 6 (No Situs Address; APN 986049315) and ensure east access is maintained during and after construction.

x. Pier configuration and design should maximize access to and through the Terminal 1 site and should minimize visual impacts to users of the site.

7. Design elements must encourage and accommodate additional small to mid-size Columbia River cruise activity at or near Terminal 1.

    a. Although the current range of design options does not directly prohibit river cruise or similar activity at Terminal 1, the port requests that the IBR team work to limit the intrusion of pier structures (particularly Pier 7) into the North Barge Channel.

8. The shared use path (SUP) should be designed in a way that allows for convenient access to Terminal 1 and the surrounding waterfront areas.

    a. The port appreciates the conversations that have happened to date between the IBR team and the port's Terminal 1 team. The port requests to work with the IBR team to advance an SUP design that does not hinder eastern access to the Terminal 1 site and provides a safe and efficient opportunity for multi-modal access to and through the project area.

9. Design and redevelop open spaces that are created or disturbed by the IBR program in consultation with the Port of Vancouver and the City of Vancouver in a manner which emphasizes connectivity with the adjacent developments and uses that complement the character of the surrounding area.

    a. The port requests to fully participate in the work to repurpose and redevelop newly created areas because of the IBR program. The area on the north bank of the

Columbia River should remain connected and safe spaces that the public can access and enjoy should be preserved. Access should be maintained to connect the waterfront during construction to the extent possible to minimize economic impacts and traffic disruptions.

10. Continue to engage the business and freight communities on a regular basis to provide feedback in critical areas such as auxiliary lane configuration, grade, turning radii, and other elements associated with freight and commerce.

    a. The port has been pleased with freight engagement to date and looks forward to working with the IBR team to ensure the continued facilitation of High, Wide, and Heavy freight movement through the project area.

        i. Specifically, the following elements are critical to the success of this effort:
            1. Safety shoulders of at least 12 feet on both sides for both directions of traffic
            2. Grades not exceeding 4% on the main profile
            3. Turning radii of at least 100 meters NB from the Mill Plain interchange
            4. Height clearances of at least 20 feet under the Mill Plain interchange and throughout the project area.
            5. Toll gantries need to have at least 25 feet of clearance

11. Maximize workforce development opportunities including but not limited to apprenticeship utilization through collaboration with regional workforce partners.

    a. The port appreciates the work that has been done to date to inform and prepare contractors for the requirements and workforce demands of this program, with an emphasis on equitable outcomes for historically disadvantaged communities. We look forward to working with the team to assist in these efforts through final design and construction.

12. The Port of Vancouver strongly encourages tolling structures and systems that do not disproportionately impact freight or inhibit regional access to jobs on either side of the Columbia River.

    a. The port will continue to monitor the Joint Oregon and Washington Transportation Commission's work on tolling this project to advocate for toll rates on freight with multipliers that are fair and consistent with regional rate structures.

Additional considerations

Beyond the twelve conditions listed in the port's resolution supporting the Modified Locally Preferred Alternative, the port has the following comments in review of the Supplemental Draft Environmental Impact Statement:

Executive Summary

The port appreciates the community outreach that has been done to date, particularly the focus on equity and inclusion of a broad range of stakeholders in meaningful discussions.

For the three bridge configurations studied, the port supports advancing either a single level or double deck configuration, noting that there are tradeoffs between freight optimization and potential impacts to the Terminal 1 site. The port does not support moving forward with a moveable span configuration as the benefits would be minimal to river commerce, while missing a key benefit of removing the only stoplight on Interstate 5 between Canada and Mexico.

The port supports advancing a design of high-capacity transit stations at Evergreen and near the Vancouver Waterfront. Park and ride locations should be avoided or limited to those necessary to ensure adequate ridership. Avoid generating unnecessary congestion in Vancouver's downtown core during peak periods.

The port does not support continuing to advance the westward shift option as the impacts to businesses and property owners outweighs the benefits.

The port strongly supports maintaining the C-Street Ramps in any final design to protect the performance of Mill Plain as the primary freight route and to improve access to the Terminal 1 sites and downtown Vancouver generally.

Significant performance improvements are realized between the "No Build" scenario, the zero auxiliary lane, and both additional auxiliary lane options. As the project moves forward in the design process, the port requests to better understand what options are available to the IBR team to improve performance of a single auxiliary lane scenario, particularly for Northbound traffic nearing the interstate bridge during the PM peak period.

The port appreciates the coordination with the construction industry to ensure workforce readiness and to minimize impacts to job losses in the project area during and after construction (S-56 Summary).

Chapter 1: Purpose and Need

The port concurs that the six areas of need identified in Chapter 1, Purpose and Need, continue to be significant challenges for our region. This includes growing travel demand and congestion, impaired freight movement, limited public transportation operations, connections, and reliability, safety and vulnerability to incidents, substandard bicycle and pedestrian facilities, and seismic vulnerabilities. Additionally, the port agrees that the current context requires an even more emphasized focus on equity and climate change impacts.

For the port, these challenges impact our ability to remain globally competitive as a gateway for project cargo, including high, wide, heavy and long shipments that are critical to our regional

and national economies. Additionally, the Columbia-Snake River system remains vulnerable to a seismic event which would devastate commerce flow stretching far into the midwestern United States. Finally, access to the port's Terminal 1 and the Vancouver Waterfront project is hindered by the historical impacts of Interstate 5 projects, creating an opportunity to reconnect key points in our community and improve access for all to this revived location.

Chapter 2: Description of Alternatives

See previous comments on the port's preferences related to the various alternatives considered in this chapter.

Chapter 3: Existing Conditions and Environmental Consequences

3.1-15 – Transit design should complement the investments that C-TRAN has made since the Columbia River Crossing project and should create regional transit connections that do not negatively impact transit ridership on existing C-TRAN routes to and from downtown Vancouver. The port supports continued express bus service from Vancouver to Portland.

3.1-31 – The port concurs with the assessment of anticipated increases in freight traffic through the project area. Specifically, that "by 2045, trucks will comprise almost 15% of total trips across the new Columbia River bridges, which is an increase of 50% in truck traffic compared to 2019. This means that freight truck traffic would grow more quickly than general traffic under all alternatives and design options."

3.1-42 – "Co-locating the shared-use path with the proposed Waterfront Station to provide additional elevator access down to Columbia Street/Columbia Way is a potential design solution that is being considered." The port requests to continue working with the IBR design team to identify a solution for both the shared use path and the waterfront station platforms that is both safe and accessible.

3.1-46 – The port appreciates efforts to minimize impacts to freight mobility throughout the project and will work with the IBR team to coordinate or amplify messaging to the freight community regarding necessary closures or detours related to the MLPA projects.

3.2-6 – River Navigation and Clearances – The economic competitiveness of the port is dependent upon a successful river economy, including the transit of cargo upriver by barge as far as Lewiston, Idaho. The port appreciates the additional horizontal clearances that this project will provide and acknowledges adequate clearances for the types of vessels currently interacting with Columbia River ports. The port stresses the importance of working closely with river economy stakeholders throughout construction to avoid or minimize any disruption to river commerce. Additionally, the port commits to work with river users listed in Table 3.2-3 to identify downriver solutions that may be needed to accommodate the varying needs of Marine Industrial Contractors.

Additionally, the port would like to further understand any impacts of shifting the North Barge Channel relocation may have on Terminal 1 related to river cruise or other vessels docking at that location.

3.2-18 – The port supports efforts to ensure continued safe passage of dredging vessels and equipment during and after construction.

3.3-6 – The port will work with the IBR team to identify updates to the existing conditions at Terminal 1 to ensure the anticipated Temporary Construction Easements and Partial Acquisitions showing in Figure 3.3-3 (Detail of Property Acquisitions in Downtown Vancouver) still apply, particularly as there are now existing office towers on the northern portion of Terminal 1, known as Combined Lot 7 [330 W Columbia Way, Vancouver, WA; APN: 986049316 (land) and 986067459 (building)]. In addition, the Port's tenant who leases Lots 5 (211 W Columbia Way, Vancouver, WA; APN 986049314) and a portion of Lot 6 (No Situs Address; APN 986049315), as those lots are currently configured, has plans underway to develop those parcels. In addition, the port has already constructed Vancouver Landing improvements adjacent to the AC by Marriott Hotel and extending to the west to Esther Street [501 W Columbia Way, Vancouver, WA (APN 502240000) and 103 Quayside Pl Unit IRR, Vancouver, WA (APN 5022450000, amongst other lots], and the port is currently constructing its replacement Terminal 1 dock [spanning across the following parcels: 103 Quayside Pl, Vancouver, WA (APN 502245000); No Situs Address (APN 502246000); and 100 Columbia St, Vancouver, WA (APN 502250000)], which will be the home of the Port's Public Market. Also, the project must avoid any disruptions to not only the BNSF mainline, but also the port-managed rail facilities that begin at this location.

3.3-13 – Staging and Casting Areas - While staging opportunities for IBRP are no longer available at Terminal 1, the port will work with the IBR team or contractor to determine if any other port sites with barge and/or rail access that would be suitable for pre-casting of concrete segments for construction of the bridges and ramps. The same applies for uses such as material or equipment storage, stockpiling soils, or providing employee parking or temporary construction offices. We currently have several pending business opportunities for our vacant properties, so those opportunities may affect the location of such available staging, casting, and other temporary use areas.

3.4-29 – The port appreciates the recognition of the Port of Vancouver Waterfront Development Master Plan and the vision for the Columbia River waterfront that is consistent with the port's mission to provide economic benefit to the community through leadership, stewardship, and partnership in maritime-related development. While the plan accounts for the Interstate Bridge replacement and its alignment relative to adjacent development, the port acknowledges that potential alignments have changed since the Columbia River Crossing project that must be addressed fully through the agreements process to ensure that the viability of the Terminal 1 project is not negatively impacted.

3.4-34 – Reduce or eliminate impacts to Marine Cargo Transport through strong coordination and phasing which ensures continuous access through the project area throughout the construction period.

3.4-35 – Confirm that no long-term economic impacts to rail traffic operations would be anticipated because of the Modified LPA for Port of Vancouver USA owned and managed rail facilities in addition to BNSF.

3.4-41 – The port commits to work with the IBR team to minimize temporary impacts to the BNSF and Port of Vancouver Railway lines and service frequency as well as to identify ways to minimize delays for commercial freight vehicles during construction.

3.4-41 – Ensure robust and consistent outreach to Terminal 1 businesses and building owners affected by construction and use assistance programs to help mitigate potential negative construction-related effects.

3.5-30 - Neighborhoods and Equity – The project should consider the significant number of new residential and commercial users at the Vancouver Waterfront and Terminal 1 locations. These residents and users should be included in the program-specific mitigation measures listed in the SDEIS. The MLPA projects will increase multimodal access to the site, but the project must address the specific needs of these new users during and after construction.

3.6-14 – Utilities and Public Services – The port commits to coordinate with the IBR team to ensure that utilities serving the Terminal 1 site are not impacted by construction and to minimize any disruption to businesses because of any required utility relocations or temporary outages.

3.7-4 - Parks and Recreation – The port appreciates the mention of benefits to the Vancouver Landing project at Terminal 1 and will work with the IBR team to avoid any negative impacts at this site during and after construction. The port requests to work with the IBR team and other stakeholders to identify a final design that improves the safety and connectivity of the Renaissance Trail and provides better access and wayfinding to the Fort Vancouver National Historic Site from the Vancouver Waterfront.

3.9-11 – Visual Quality – The port recognizes that the "single-level fixed-span configurations would have a slimmer vertical profile and would grant viewers in proximity or beneath the Columbia River bridges along the Vancouver waterfront with more expansive and unobstructed views below bridge decks and between piers." In any configuration, final design should maximize the visual quality of high traffic areas and community gather places, such as Terminal 1 and the Vancouver Waterfront. The port requests to align Pier 7 to improve the eastern viewshed from the Terminal 1 dock and Public Market building.

The design of Pier 7 and its foundation needs to be coordinated with the construction of the east dock to ensure both structural and seismic integrity, maintenance of function, and aesthetic appeal.

Generally, the port prefers the extradosed design option for the interstate bridge structure purely for the visual appeal from the Terminal 1 location. In any scenario, bridge type should consider the visual impacts for those on either side of the river.

3.9-28 – North Bank - The area underneath the bridge at the Vancouver Waterfront should be designed to be safe and secure for bicycle and pedestrian traffic as that area will connect the waterfront with the rest of the bike-ped trail headed east parallel to SR-14.

3.10-13 - Air Quality – The project should result in air quality in the adjacent area that is the same or better than existing conditions. Monitoring should occur to ensure that construction-related air quality impacts remain at acceptable levels as the Terminal 1 site is now an active job and retail center.

3.11-18 - Noise and Vibrations – Ensure that noise impacts at points DT-030, DT-031, and DT-032 are equal to or better than the No Build scenario and implement measures such as sound walls where feasible to further mitigate for noise impacts at the Terminal 1 site, particularly for newly adjacent commercial and retail employees as well visitors to this location.

3.14-13 - Water Quality and Hydrology – Coordinate with the port team to ensure stormwater management best practices are used, specifically for those projects affecting port properties.

3.16-2 – Table 3.16-1 – "CRC LPA included removal of a portion of the existing dock at the Port of Vancouver's Terminal 1, which is not part of the Modified LPA." – While the dock that existed during the CRC LPA is no longer there, this statement should be updated to reflect any potential impacts to the new dock structure and mitigation for any related impacts to water-surface level overwater shading. The Port is currently constructing bank improvements for the replacement dock, and construction of the replacement dock itself will be underway during 2025 (No Situs Address; APN 502246000 and 502250000).

3.16-40 - Ecosystems – The port commits to work with the IBR team to implement Fish Salvage Best Management Practices for those elements adjacent to and associated with the Terminal 1 location. The port's dock replacement project has been designed to improve fish habitat at the site and those benefits must be maintained throughout the project period.

3.17-8 - Geology and Groundwater – The port's current and planned development at Terminal 1 is, and will continue to be, built to current seismic safety standards, including ground stabilization efforts to reduce the impacts of liquefaction.

3.17-9 – Groundwater Resources – The port requests to work with the IBR team to identify proper mitigation and replacement for the impacts to the area at Terminal 1 known as the East Portal, which was planned to have positive impacts to stormwater at that site but will likely be impacted by the MLPA projects.

3.20-45 – Environmental Justice – The port supports efforts to avoid negative impacts to EJ populations and to mitigate where necessary. The port will work with the IBR team to support mitigation efforts that could include port properties or programs.

3.23-1-3 - Cumulative Effects – Recent and planned development at the Vancouver Waterfront must be taken into full consideration as the IBR Program advances. The Terminal 1 site now includes a redeveloped Vancouver Landing site [103 Quayside Pl Unit IRR, Vancouver, WA (APN 502245000); 501 W Columbia Way, Vancouver, WA (APN 502240000); No Situs Addresses (APN 986049325, 986049324, and 986049323)], an AC by Marriott Hotel (Lot 3; 333 W Columbia Way, Vancouver, WA; APN 986049313), two office towers adjacent to the project area (Combined Lot 7; 330 W Columbia Way, Vancouver, WA; APN 986049316 (land) and 986067459 (buildings), and additional residential construction now under construction (Adjusted Lot 1; 440 W Columbia Way, Vancouver, WA; APN 986049311 (land) and 986067977 (building). Additionally, in the next few years, the port anticipates additional residential, retail and commercial development occurring at the Terminal 1 site [Lot 5 (211 W Columbia Way, Vancouver, WA; APN 986049314) and Lot 6 (No Situs Address; APN 986049315).

"Changes in the project footprint necessitated by changed conditions resulting in shifting the light-rail transit alignment, modifying interchange designs, and adding bridge configuration options." – The shift in the project footprint will likely impact existing port properties and leaseholds. The port will work with the IBR team to ensure that impacts are avoided where possible and sufficiently mitigated as warranted.

The port appreciates the recognition of the significant investment in the West Vancouver Freight Access Project (WVFA) and will work with the IBR team to avoid impacts to rail traffic entering and exiting port properties.

"Terminal 1 would be a mixed-use development with a hotel, office and retail space, outdoor gathering areas, and a public marketplace. Terminal 1 would also complete a missing segment of the Vancouver Waterfront Renaissance Trail, connecting the existing trail at the Vancouver waterfront to the existing Columbia River Renaissance Trail east of Terminal 1. Some elements have been constructed, including an outdoor amphitheater. Construction of other features is underway, with an anticipated completion date of 2027." – The port will continue to update the IBR project team on timelines and key milestones for the development of Terminal 1. The replacement of the Terminal 1 dock will begin in 2025 and both the construction of a Public Market, the extension of the Renaissance Trail, as well as the development of Blocks 5/6 are anticipated to occur prior to, or in the same timeframe as the construction of the MLPA.

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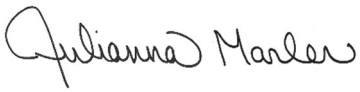
Thank you for your work to advance the IBR Program and for your consideration of our requests. We look forward to working with you and your team to advance the project to Final Design.

Sincerely,



Julianna Marler, CEO

3103 NW Lower River Road, Vancouver, WA 98660 ♦ (360) 693-3611 ♦ Fax (360) 735-1565 ♦ www.Portvanusa.com

Port of Vancouver USA

November 15th, 2024

Interstate Bridge Replacement Program
Attn: Greg Johnson, Program Administrator
500 Broadway, Suite 200
Vancouver, WA 98660

RE: Port of Vancouver USA Comments on the Interstate Bridge Replacement Program Draft Supplemental Environmental Impact Statement

Administrator Johnson,

Congratulations on the milestone of releasing the Supplemental Draft Environmental Impact Statement for public comment. The Port of Vancouver USA appreciates the tremendous work that has been done to reach this point and to advance the efforts to successfully complete the Interstate Bridge Replacement Program (IBRP).

The purpose of this letter is to acknowledge the Port of Vancouver USA's support for advancing the project to a Final Supplemental Environmental Impact Statement (FSEIS), to assess the IBRP's response to the twelve conditions listed in the Port's Resolution 3-2022, to support the Modified Locally Preferred Alternative (MLPA), and to express the port's initial preferences and considerations as the program moves toward final design.

In its 2022 resolution supporting the MLPA, the port included twelve conditions of approval that needed to be addressed as the project team moved to the release of the SDEIS. The following is an assessment of each of the conditions and the response from the project team to date:

1. Study the performance of both one and two auxiliary lanes to identify a final design which maximizes safety and efficiency of freight and general-purpose traffic through the bridge influence area, including but not limited to consideration of High, Wide, and Heavy freight needs.

    a. The project team studied the performance of both one and two auxiliary lanes throughout the program area. The port requests that, if the project only includes one auxiliary lane in each direction, to consider design, technological and other methods to reduce the congestion time and length, particularly for the northbound lanes, and to do the same for potential safety improvements. Whether one or two

auxiliary lanes are selected, adequate shoulders on both sides and other safety measures must not be compromised.

2. Provide adequate safety shoulders on both sides of the freeway for both Northbound and Southbound lanes to maximize safety, sufficient emergency access, and reliability through the corridor.

    a. This condition has been met and needs to be maintained throughout the final design process.

3. Accommodate High, Wide, Heavy, and Long (up to 80 meters) freight movements at the Mill Plain Interchange and provide unencumbered connections to key trade routes for the region.

    a. The project team has worked with the port on these issues and the port requests continued coordination to ensure that high, wide and heavy cargo can safely move through this project area. The port specifically requests that the Mill Plain Interchange accommodate northbound turns from Mill Plain to I-5 of at least 100 meters (turning radius) to accommodate wind farm shipments (I-5 to SR-500 to I-205). Additionally, new bridges should accommodate high wide and heavy freight and as such any toll gantries should be at least 25 feet above the roadway allowing for freight to move under them.

4. Compliment and support the goals and actions listed in the Port of Vancouver's Climate Action Plan Project in Greenhouse Gas (GHG) reduction efforts. Minimize idling of freight and general-purpose traffic.

    a. The port supports the additional focus on Climate Change listed in Section 3.19 of the SDEIS. Consider including the Port of Vancouver's Climate Action Plan (https://www.portvanusa.com/environmental-services/climate-action-plan/) in the Final Environmental Impact Statement (FEIS) as further evidence of strong political support for climate action and established citywide policies to address the impacts of climate change for their communities.
    b. Ensure the final design improves capacity for freight and reduces freight and general –purpose traffic congestion to minimize the environmental impacts of idling.

5. Include a high-capacity transit station near Terminal 1 with multimodal access, designed and operated in a manner which maximizes safety and accessibility.

    a. The port supports the work that has been done to date to include a High-Capacity Transit Station near the Vancouver Waterfront while avoiding or minimizing direct impacts to the port's Terminal 1 properties. We look forward to working with the IBRP team to advance a design that is safe, accessible, and maximizes multi-modal opportunities for commuters and other users of the facility.

6. Continue to solicit feedback from the port and Terminal 1 stakeholders to ensure the final design compliments and avoids negative impacts to existing and proposed developments on that site.

    a. The port appreciates the focus on avoiding or mitigating impacts to the Terminal 1 Master-Planned Development adjacent to the project area. The port team will continue to work with the IBR team and contractors to advance a design that respects the following:

        i. Impacts to the newly developed office towers should be avoided. Access to the building hosting thousands of jobs must be maintained throughout construction of the IBRP. The port appreciates the commitments from the project to establish a hotline for noise complaints as well as vibration monitoring throughout the project (Section 3.11). Specifically, the port anticipates the following parcels will be impacted:
            1. Office Towers at T1 Combined Lot 7 - 330 W Columbia Way, Vancouver, WA; APN: 986049316 (land)/986067459 (building) (construction complete)
            2. AC by Marriott Hotel at T1 Lot 3 - 333 W Columbia Way, Vancouver, WA; APN: 986049313 (land)/986061511 (Bldg) (construction complete)
            3. Tract H at Terminal 1 - No Situs Address; APN: 986049326 used as walkways for Vancouver Waterfront, serving AC by Marriott Hotel and Port's adjacent parcel T1 Lot 4 (255 W Columbia Way, Vancouver, WA; APN: 48843000)
            4. T1 Adj Lot 1 currently under development/leased by BOZ Port Block 1 Owner LLC - 440 W Columbia Way, Vancouver, WA; APN: 986049311 (land)/986067977 (building)
            5. Other port-owned parcels at Terminal 1 are likely to be impacted as well.

        ii. Design elements of the project should improve multi-modal accessibility to the Terminal 1 and Vancouver Waterfront sites.

        iii. Park and rides should be minimized or located to avoid additional congestion and safety issues for those accessing Terminal 1 and waterfront areas.

        iv. The IBRP should be designed to ensure that the Terminal 1 vision of public access, affordability and enjoyment can be maintained through the viable construction of a Public Market and associated infrastructure at the site. Specifically, east access to the site, continuation of the Renaissance Trail and required parking is essential for the success of the Public Market.

        v. Impacts from Pier 7 should be minimized. Unavoidable impacts to the dock or associated infrastructure must be fully mitigated, and the port must be adequately compensated for such impacts. The IBR Right of Way and Agreements Team should work to identify a mutually agreeable solution as a top priority as the port is moving forward with contracting for the dock replacement project in December of 2024.

vi. In-water structures should be placed and designed as to minimize dock footprint impacts and negative impacts to the visual aesthetic from Terminal 1 users as well as to avoid negative impacts to river cruise and similar anticipated water users of the Terminal 1 Dock.

vii. The port's in-water assets must be protected from river debris during and after construction.

viii. The IBR team must work with the port to redesign the area known as the East Portal to ensure no loss of function and to address the mutual needs of both parties at that location. The IBR team will be responsible for the relocation of the Boat of Discovery art installation in the East Portal area.

ix. The IBRP design including Piers 8, 7.5 and 7 and corresponding superstructure should avoid or minimize impacts to Terminal 1 Lot 5 (211 W Columbia Way, Vancouver, WA; APN 986049314) and Terminal 1 Lot 6 (No Situs Address; APN 986049315) and ensure east access is maintained during and after construction.

x. Pier configuration and design should maximize access to and through the Terminal 1 site and should minimize visual impacts to users of the site.

7. Design elements must encourage and accommodate additional small to mid-size Columbia River cruise activity at or near Terminal 1.

    a. Although the current range of design options does not directly prohibit river cruise or similar activity at Terminal 1, the port requests that the IBR team work to limit the intrusion of pier structures (particularly Pier 7) into the North Barge Channel.

8. The shared use path (SUP) should be designed in a way that allows for convenient access to Terminal 1 and the surrounding waterfront areas.

    a. The port appreciates the conversations that have happened to date between the IBR team and the port's Terminal 1 team. The port requests to work with the IBR team to advance an SUP design that does not hinder eastern access to the Terminal 1 site and provides a safe and efficient opportunity for multi-modal access to and through the project area.

9. Design and redevelop open spaces that are created or disturbed by the IBR program in consultation with the Port of Vancouver and the City of Vancouver in a manner which emphasizes connectivity with the adjacent developments and uses that complement the character of the surrounding area.

    a. The port requests to fully participate in the work to repurpose and redevelop newly created areas because of the IBR program. The area on the north bank of the

Columbia River should remain connected and safe spaces that the public can access and enjoy should be preserved. Access should be maintained to connect the waterfront during construction to the extent possible to minimize economic impacts and traffic disruptions.

10. Continue to engage the business and freight communities on a regular basis to provide feedback in critical areas such as auxiliary lane configuration, grade, turning radii, and other elements associated with freight and commerce.

    a. The port has been pleased with freight engagement to date and looks forward to working with the IBR team to ensure the continued facilitation of High, Wide, and Heavy freight movement through the project area.

        i. Specifically, the following elements are critical to the success of this effort:
            1. Safety shoulders of at least 12 feet on both sides for both directions of traffic
            2. Grades not exceeding 4% on the main profile
            3. Turning radii of at least 100 meters NB from the Mill Plain interchange
            4. Height clearances of at least 20 feet under the Mill Plain interchange and throughout the project area.
            5. Toll gantries need to have at least 25 feet of clearance

11. Maximize workforce development opportunities including but not limited to apprenticeship utilization through collaboration with regional workforce partners.

    a. The port appreciates the work that has been done to date to inform and prepare contractors for the requirements and workforce demands of this program, with an emphasis on equitable outcomes for historically disadvantaged communities. We look forward to working with the team to assist in these efforts through final design and construction.

12. The Port of Vancouver strongly encourages tolling structures and systems that do not disproportionately impact freight or inhibit regional access to jobs on either side of the Columbia River.

    a. The port will continue to monitor the Joint Oregon and Washington Transportation Commission's work on tolling this project to advocate for toll rates on freight with multipliers that are fair and consistent with regional rate structures.

Additional considerations

Beyond the twelve conditions listed in the port's resolution supporting the Modified Locally Preferred Alternative, the port has the following comments in review of the Supplemental Draft Environmental Impact Statement:

Executive Summary

The port appreciates the community outreach that has been done to date, particularly the focus on equity and inclusion of a broad range of stakeholders in meaningful discussions.

For the three bridge configurations studied, the port supports advancing either a single level or double deck configuration, noting that there are tradeoffs between freight optimization and potential impacts to the Terminal 1 site. The port does not support moving forward with a moveable span configuration as the benefits would be minimal to river commerce, while missing a key benefit of removing the only stoplight on Interstate 5 between Canada and Mexico.

The port supports advancing a design of high-capacity transit stations at Evergreen and near the Vancouver Waterfront. Park and ride locations should be avoided or limited to those necessary to ensure adequate ridership. Avoid generating unnecessary congestion in Vancouver's downtown core during peak periods.

The port does not support continuing to advance the westward shift option as the impacts to businesses and property owners outweighs the benefits.

The port strongly supports maintaining the C-Street Ramps in any final design to protect the performance of Mill Plain as the primary freight route and to improve access to the Terminal 1 sites and downtown Vancouver generally.

Significant performance improvements are realized between the "No Build" scenario, the zero auxiliary lane, and both additional auxiliary lane options. As the project moves forward in the design process, the port requests to better understand what options are available to the IBR team to improve performance of a single auxiliary lane scenario, particularly for Northbound traffic nearing the interstate bridge during the PM peak period.

The port appreciates the coordination with the construction industry to ensure workforce readiness and to minimize impacts to job losses in the project area during and after construction (S-56 Summary).

Chapter 1: Purpose and Need

The port concurs that the six areas of need identified in Chapter 1, Purpose and Need, continue to be significant challenges for our region. This includes growing travel demand and congestion, impaired freight movement, limited public transportation operations, connections, and reliability, safety and vulnerability to incidents, substandard bicycle and pedestrian facilities, and seismic vulnerabilities. Additionally, the port agrees that the current context requires an even more emphasized focus on equity and climate change impacts.

For the port, these challenges impact our ability to remain globally competitive as a gateway for project cargo, including high, wide, heavy and long shipments that are critical to our regional

and national economies. Additionally, the Columbia-Snake River system remains vulnerable to a seismic event which would devastate commerce flow stretching far into the midwestern United States. Finally, access to the port's Terminal 1 and the Vancouver Waterfront project is hindered by the historical impacts of Interstate 5 projects, creating an opportunity to reconnect key points in our community and improve access for all to this revived location.

Chapter 2: Description of Alternatives

See previous comments on the port's preferences related to the various alternatives considered in this chapter.

Chapter 3: Existing Conditions and Environmental Consequences

3.1-15 – Transit design should complement the investments that C-TRAN has made since the Columbia River Crossing project and should create regional transit connections that do not negatively impact transit ridership on existing C-TRAN routes to and from downtown Vancouver. The port supports continued express bus service from Vancouver to Portland.

3.1-31 – The port concurs with the assessment of anticipated increases in freight traffic through the project area. Specifically, that "by 2045, trucks will comprise almost 15% of total trips across the new Columbia River bridges, which is an increase of 50% in truck traffic compared to 2019. This means that freight truck traffic would grow more quickly than general traffic under all alternatives and design options."

3.1-42 – "Co-locating the shared-use path with the proposed Waterfront Station to provide additional elevator access down to Columbia Street/Columbia Way is a potential design solution that is being considered." The port requests to continue working with the IBR design team to identify a solution for both the shared use path and the waterfront station platforms that is both safe and accessible.

3.1-46 – The port appreciates efforts to minimize impacts to freight mobility throughout the project and will work with the IBR team to coordinate or amplify messaging to the freight community regarding necessary closures or detours related to the MLPA projects.

3.2-6 – River Navigation and Clearances – The economic competitiveness of the port is dependent upon a successful river economy, including the transit of cargo upriver by barge as far as Lewiston, Idaho. The port appreciates the additional horizontal clearances that this project will provide and acknowledges adequate clearances for the types of vessels currently interacting with Columbia River ports. The port stresses the importance of working closely with river economy stakeholders throughout construction to avoid or minimize any disruption to river commerce. Additionally, the port commits to work with river users listed in Table 3.2-3 to identify downriver solutions that may be needed to accommodate the varying needs of Marine Industrial Contractors.

Additionally, the port would like to further understand any impacts of shifting the North Barge Channel relocation may have on Terminal 1 related to river cruise or other vessels docking at that location.

3.2-18 – The port supports efforts to ensure continued safe passage of dredging vessels and equipment during and after construction.

3.3-6 – The port will work with the IBR team to identify updates to the existing conditions at Terminal 1 to ensure the anticipated Temporary Construction Easements and Partial Acquisitions showing in Figure 3.3-3 (Detail of Property Acquisitions in Downtown Vancouver) still apply, particularly as there are now existing office towers on the northern portion of Terminal 1, known as Combined Lot 7 [330 W Columbia Way, Vancouver, WA; APN: 986049316 (land) and 986067459 (building)]. In addition, the Port's tenant who leases Lots 5 (211 W Columbia Way, Vancouver, WA; APN 986049314) and a portion of Lot 6 (No Situs Address; APN 986049315), as those lots are currently configured, has plans underway to develop those parcels. In addition, the port has already constructed Vancouver Landing improvements adjacent to the AC by Marriott Hotel and extending to the west to Esther Street [501 W Columbia Way, Vancouver, WA (APN 502240000) and 103 Quayside Pl Unit IRR, Vancouver, WA (APN 5022450000, amongst other lots], and the port is currently constructing its replacement Terminal 1 dock [spanning across the following parcels: 103 Quayside Pl, Vancouver, WA (APN 502245000); No Situs Address (APN 502246000); and 100 Columbia St, Vancouver, WA (APN 502250000)], which will be the home of the Port's Public Market. Also, the project must avoid any disruptions to not only the BNSF mainline, but also the port-managed rail facilities that begin at this location.

3.3-13 – Staging and Casting Areas - While staging opportunities for IBRP are no longer available at Terminal 1, the port will work with the IBR team or contractor to determine if any other port sites with barge and/or rail access that would be suitable for pre-casting of concrete segments for construction of the bridges and ramps. The same applies for uses such as material or equipment storage, stockpiling soils, or providing employee parking or temporary construction offices. We currently have several pending business opportunities for our vacant properties, so those opportunities may affect the location of such available staging, casting, and other temporary use areas.

3.4-29 – The port appreciates the recognition of the Port of Vancouver Waterfront Development Master Plan and the vision for the Columbia River waterfront that is consistent with the port's mission to provide economic benefit to the community through leadership, stewardship, and partnership in maritime-related development. While the plan accounts for the Interstate Bridge replacement and its alignment relative to adjacent development, the port acknowledges that potential alignments have changed since the Columbia River Crossing project that must be addressed fully through the agreements process to ensure that the viability of the Terminal 1 project is not negatively impacted.

3.4-34 – Reduce or eliminate impacts to Marine Cargo Transport through strong coordination and phasing which ensures continuous access through the project area throughout the construction period.

3.4-35 – Confirm that no long-term economic impacts to rail traffic operations would be anticipated because of the Modified LPA for Port of Vancouver USA owned and managed rail facilities in addition to BNSF.

3.4-41 – The port commits to work with the IBR team to minimize temporary impacts to the BNSF and Port of Vancouver Railway lines and service frequency as well as to identify ways to minimize delays for commercial freight vehicles during construction.

3.4-41 – Ensure robust and consistent outreach to Terminal 1 businesses and building owners affected by construction and use assistance programs to help mitigate potential negative construction-related effects.

3.5-30 - Neighborhoods and Equity – The project should consider the significant number of new residential and commercial users at the Vancouver Waterfront and Terminal 1 locations. These residents and users should be included in the program-specific mitigation measures listed in the SDEIS. The MLPA projects will increase multimodal access to the site, but the project must address the specific needs of these new users during and after construction.

3.6-14 – Utilities and Public Services – The port commits to coordinate with the IBR team to ensure that utilities serving the Terminal 1 site are not impacted by construction and to minimize any disruption to businesses because of any required utility relocations or temporary outages.

3.7-4 - Parks and Recreation – The port appreciates the mention of benefits to the Vancouver Landing project at Terminal 1 and will work with the IBR team to avoid any negative impacts at this site during and after construction. The port requests to work with the IBR team and other stakeholders to identify a final design that improves the safety and connectivity of the Renaissance Trail and provides better access and wayfinding to the Fort Vancouver National Historic Site from the Vancouver Waterfront.

3.9-11 – Visual Quality – The port recognizes that the "single-level fixed-span configurations would have a slimmer vertical profile and would grant viewers in proximity or beneath the Columbia River bridges along the Vancouver waterfront with more expansive and unobstructed views below bridge decks and between piers." In any configuration, final design should maximize the visual quality of high traffic areas and community gather places, such as Terminal 1 and the Vancouver Waterfront. The port requests to align Pier 7 to improve the eastern viewshed from the Terminal 1 dock and Public Market building.

The design of Pier 7 and its foundation needs to be coordinated with the construction of the east dock to ensure both structural and seismic integrity, maintenance of function, and aesthetic appeal.

Generally, the port prefers the extradosed design option for the interstate bridge structure purely for the visual appeal from the Terminal 1 location. In any scenario, bridge type should consider the visual impacts for those on either side of the river.

3.9-28 – North Bank - The area underneath the bridge at the Vancouver Waterfront should be designed to be safe and secure for bicycle and pedestrian traffic as that area will connect the waterfront with the rest of the bike-ped trail headed east parallel to SR-14.

3.10-13 - Air Quality – The project should result in air quality in the adjacent area that is the same or better than existing conditions. Monitoring should occur to ensure that construction-related air quality impacts remain at acceptable levels as the Terminal 1 site is now an active job and retail center.

3.11-18 - Noise and Vibrations – Ensure that noise impacts at points DT-030, DT-031, and DT-032 are equal to or better than the No Build scenario and implement measures such as sound walls where feasible to further mitigate for noise impacts at the Terminal 1 site, particularly for newly adjacent commercial and retail employees as well visitors to this location.

3.14-13 - Water Quality and Hydrology – Coordinate with the port team to ensure stormwater management best practices are used, specifically for those projects affecting port properties.

3.16-2 – Table 3.16-1 – "CRC LPA included removal of a portion of the existing dock at the Port of Vancouver's Terminal 1, which is not part of the Modified LPA." – While the dock that existed during the CRC LPA is no longer there, this statement should be updated to reflect any potential impacts to the new dock structure and mitigation for any related impacts to water-surface level overwater shading. The Port is currently constructing bank improvements for the replacement dock, and construction of the replacement dock itself will be underway during 2025 (No Situs Address; APN 502246000 and 502250000).

3.16-40 - Ecosystems – The port commits to work with the IBR team to implement Fish Salvage Best Management Practices for those elements adjacent to and associated with the Terminal 1 location. The port's dock replacement project has been designed to improve fish habitat at the site and those benefits must be maintained throughout the project period.

3.17-8 - Geology and Groundwater – The port's current and planned development at Terminal 1 is, and will continue to be, built to current seismic safety standards, including ground stabilization efforts to reduce the impacts of liquefaction.

3.17-9 – Groundwater Resources – The port requests to work with the IBR team to identify proper mitigation and replacement for the impacts to the area at Terminal 1 known as the East Portal, which was planned to have positive impacts to stormwater at that site but will likely be impacted by the MLPA projects.

3.20-45 – Environmental Justice – The port supports efforts to avoid negative impacts to EJ populations and to mitigate where necessary. The port will work with the IBR team to support mitigation efforts that could include port properties or programs.

3.23-1-3 - Cumulative Effects – Recent and planned development at the Vancouver Waterfront must be taken into full consideration as the IBR Program advances. The Terminal 1 site now includes a redeveloped Vancouver Landing site [103 Quayside Pl Unit IRR, Vancouver, WA (APN 502245000); 501 W Columbia Way, Vancouver, WA (APN 502240000); No Situs Addresses (APN 986049325, 986049324, and 986049323)], an AC by Marriott Hotel (Lot 3; 333 W Columbia Way, Vancouver, WA; APN 986049313), two office towers adjacent to the project area (Combined Lot 7; 330 W Columbia Way, Vancouver, WA; APN 986049316 (land) and 986067459 (buildings), and additional residential construction now under construction (Adjusted Lot 1; 440 W Columbia Way, Vancouver, WA; APN 986049311 (land) and 986067977 (building). Additionally, in the next few years, the port anticipates additional residential, retail and commercial development occurring at the Terminal 1 site [Lot 5 (211 W Columbia Way, Vancouver, WA; APN 986049314) and Lot 6 (No Situs Address; APN 986049315).

"Changes in the project footprint necessitated by changed conditions resulting in shifting the light-rail transit alignment, modifying interchange designs, and adding bridge configuration options." – The shift in the project footprint will likely impact existing port properties and leaseholds. The port will work with the IBR team to ensure that impacts are avoided where possible and sufficiently mitigated as warranted.

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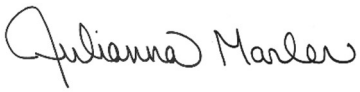
Sincerely,



Julianna Marler, CEO

3103 NW Lower River Road, Vancouver, WA 98660 ♦ (360) 693-3611 ♦ Fax (360) 735-1565 ♦ www.Portvanusa.com

IBR Draft SEIS - RECORD #2449 DETAIL

First Name :	Jeremy
Last Name :	Smith
Attachments :	DSEIS_2449_Smith_Original.pdf (4 kb)

IBR Draft SEIS - RECORD #2449 DETAIL

Submission Date : 11/16/2024
First Name : Jeremy
Last Name : Smith
Business/Organization/Agency :

Submission Input :

First Name:
Jeremy

Last Name:
Smith

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Other

Comment:
Inclusion of the light rail extension to Vancouver and designing for a high speed rail crossing from Portland to Seattle is crucial to prepare for the transportation needs of the future.

JCA comment #: 463

IBR Draft SEIS - RECORD #2450 DETAIL

First Name :	Jeremiah
Last Name :	Via
Attachments :	DSEIS_2450_Via_Original.pdf (4 kb)

IBR Draft SEIS - RECORD #2450 DETAIL

Submission Date : 11/16/2024
First Name : Jeremiah
Last Name : Via
Business/Organization/Agency :

Submission Input :

First Name:
Jeremiah

Last Name:
Via

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Land Use and Economy

Comment:
The IBR project in its current form is an expensive mistake that will saddle Oregonians with an entire generation of debt. The resultant loss in productive properties to be acquired will also permanently impact Portland's and Vancouver's budget and require service cuts. Please right size this project and focus only on the minimum bridge replacement needed.

JCA comment #: 462

IBR Draft SEIS - RECORD #2451 DETAIL

First Name :	Yannick
Last Name :	Laurin
Attachments :	DSEIS_2451_Laurin_Original.pdf (4 kb)

IBR Draft SEIS - RECORD #2451 DETAIL

Submission Date : 11/16/2024
First Name : Yannick
Last Name : Laurin
Business/Organization/Agency :

Submission Input :

First Name:
Yannick

Last Name:
Laurin

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
No highway widening! It’s been shown not to achieve stated goals and ultimately attracts more traffic.

JCA comment #: 461

IBR Draft SEIS - RECORD #2452 DETAIL

First Name :	Nick
Last Name :	Fox
Attachments :	DSEIS_2452_Fox_Original.pdf (46 kb)

IBR Draft SEIS - RECORD #2452 DETAIL

Submission Date : 11/16/2024
First Name : Nick
Last Name : Fox
Business/Organization/Agency :

Submission Input :

First Name:
Nick

Last Name:
Fox

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
I know that a stronger, more earthquake-resistant bridge is necessary. I believe it should be built with strong public transportation options--research shows clearly that people will use transit when it is a good option. During many rush-hours... a lightrail or dedicated bus rapid transit line would be the better option for many commuters. Build it!

To make space for it, you must factor in induced demand. Adding more lanes is not a solution--it just creates other bottlenecks.

I hope that committee will prioritize actions that move towards repairing the harm that was done when I-5 was cut through the Albina neighborhood of North Portland. Using tolling, for instance, that charges Amazon and UPS more than residents is easy to do--and would be an effective way to increase air quality in North Portland.

JCA comment #: 460

IBR Draft SEIS - RECORD #2453 DETAIL

First Name :	Julian
Last Name :	Nychay
Attachments :	DSEIS_2453_Nychay_Original.pdf (5 kb)

IBR Draft SEIS - RECORD #2453 DETAIL

Submission Date : 11/16/2024
First Name : Julian
Last Name : Nychay
Business/Organization/Agency :

Submission Input :

First Name:
Julian

Last Name:
Nychay

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
Hello,

My name is Julian Nychay, I've been a resident of Portland and Seattle, ie: Oregon and Washington, my entire life. I've used the interstate crossing many times in my life, being a key way of connection between our two beautiful states. For many years the issues of the interstate highway connection bridge has been a topic of

much debate and soreness for many. It is an icon. For both states. Being around since before many of us were born, it is a key signifier on both sides of the state lines. That represents our crossing and a pivotal landmark for both Washington and Oregon, alike. However, the bridge has seen better days. And with population growth on both sides ramping up these past decades, change is a must.

The lanes are not big enough for the heavy and fast moving commercial and industrial traffic that moves through everyday. The sidewalks for pedestrians and bikers has been a sore point of entry for both sides and a change must happen.

I feel as an architectural student here at Portland State University and a lover of infrastructure and architecture. Both states deserve to have their voices heard and work together to build a safer and more efficient way of travel between them.

My view is that a multilane interstate connection node is much needed. With wide pedestrian and bike crossings and most importantly a safe way for freight and passenger transportation to move through. A great suggestion is having a flat bridge that connects both sides of the Columbia, however it will loose the charm and landmark appeal of the old bridge. So possibly a way of honoring the past is by having one section still be a levered bridge that goes up for heavy and tall maritime crossings. This can be done on one side of the bridge allowing the rest to be multi car lanes for both semi trucks and automobiles to pass safely. Relieving drivers and passengers of high traffic congestion. All of these points have been said and discussed but as a citizen being able to see that change would be very rewarding.

Thank you.

JCA comment #: 459

IBR Draft SEIS - RECORD #2454 DETAIL

First Name :	Nathan
Last Name :	DeSpain
Attachments :	DSEIS_2454_DeSpain_Original.pdf (4 kb)

IBR Draft SEIS - RECORD #2454 DETAIL

Submission Date : 11/16/2024
First Name : Nathan
Last Name : DeSpain
Business/Organization/Agency :

Submission Input :

First Name:
Nathan

Last Name:
DeSpain

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
I've ridden my bike a twice times to Hayden Island. It's a loud, largely not enjoyable process. I would travel there more often if it was more pleasant. I fear the current plan to have the transit line separate from the multi-use path will result in another unpleasant leg of the journey. Putting the transit right of way between the active use path and the highway could provide some sound improvements while also improving ease of multi-modal transportation.
Looking at the sound section of the LPA I didn't see a sound section of the document related to users of the multi-use path. Highways are extremely loud and can exceed dangerous levels. Are users of the path going to need hearing protection if they are going to use the path? Who is going to use such infrastructure if merely standing on it is painfully loud. Only the most hard core users are going to be interested in such a path.

Significant sound barriers at minimum should be put in place to protect users and ensure a pleasant experience on the bridge.
Further distancing the path from the highway would improve experience and increase use of the path. Ensuring users have access to transit would also improve user experience.

JCA comment #: 458

IBR Draft SEIS - RECORD #2455 DETAIL

First Name :	Ted
Last Name :	Sarvata
Attachments :	DSEIS_2455_Sarvata_Original.pdf (4 kb)

IBR Draft SEIS - RECORD #2455 DETAIL

Submission Date :	11/16/2024
First Name :	Ted
Last Name :	Sarvata
Business/Organization/Agency :	

Submission Input :

First Name:
Ted

Last Name:
Sarvata

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
Yes, the budget needs to be replaced.

No, we don’t need a massive freeway expansion to go with it.

We need transit and space for pedestrians and cyclists. I prefer light rail, personally.

As the the expansion, climate leaders don’t widen freeways.

JCA comment #: 457

IBR Draft SEIS - RECORD #2456 DETAIL

First Name :	Nathan
Last Name :	DeSpain
Attachments :	DSEIS_2456_DeSpain_Original.pdf (3 kb)

IBR Draft SEIS - RECORD #2456 DETAIL

Submission Date :	11/16/2024
First Name :	Nathan
Last Name :	DeSpain
Business/Organization/Agency :	Climate Reality

Submission Input :

First Name:
Nathan

Last Name:
DeSpain

Business or Organization:
Climate Reality

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
I'm thrilled with the yellow line extension included in this project. I make frequent visits to Vancouver to visit family and I look forward to having an alternative to driving. I'll save money and avoid traffic.

JCA comment #: 456

IBR Draft SEIS - RECORD #2457 DETAIL

First Name :	Lupe
Last Name :	Alejandro
Attachments :	DSEIS_2457_Alejandro_Original.pdf (5 kb)

IBR Draft SEIS - RECORD #2457 DETAIL

Submission Date : 11/16/2024
First Name : Lupe
Last Name : Alejandro
Business/Organization/Agency :

Submission Input :

First Name:
Lupe

Last Name:
Alejandro

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
It appears you don't have all your ducks in a row. There are more questions than answers available. There is no rush, since this has obviously been in the works for many, many years! Here are a few things to consider.

1. The $7-12 billion cost is outrageous, while doing little to solve I-5 traffic congestion at the I-5 bridge.

2. The massive bridge will inevitably experience massive cost overruns, causing a redirection of funding meant for social programs.

3. Bridge tolls at $3-$15 each way, will impose a heavy and daily financial burden on all adjacent communities.

4. IBR's fixed-spans offer only 116 feet of vertical clearance above water, a full 62 ft less than today's drawbridge which will significantly restrict larger commercial vessels from using the Columbia River to support upstream communities.

5. The estimated 175 ft bridge height will be an eyesore that will detract from the current scenic beauty of the crossing.

6. Per the committee, IBR bridge plans will not be engineered to withstand a major Cascade Seduction Zone earthquake! Scientists are currently predicting there is about a 37% chance that a mega-thrust earthquake in this fault zone will occur in the next 50 years.

7. The IBR is an area where ground liquefaction is "expected" during a major earthquake. Liquefaction is a major threat to any bridge.

8. The Delta Park 30ft high 1/4 mile corkscrew bike & pedestrian access ramp, is too long & steep for the general public.

9. At 100ft above ground, the Vancouver transit station will be a long reach as elevator outages do happen.

10. At 30ft above ground, the Hayden Island transit station will also be a long reach subject to periodic elevator outages.

11. The 18-lane interchange planned for Hayden Island will create a very wide ugly swath of multiple pavement lanes across prime retail property, and a navigational nightmare for the visiting public and islanders.

12. The bridge's 15-year construction period will create a huge loss of quality of life, income, & property values for Hayden Island and adjacent communities.

13. Insist on an additional 120 days for public review & comment, given IBR's refusal to release full bridge information.

14. An Independent Engineering Commission should investigate & evaluate the option of more suitable, far less costly, and considerably more environmentally friendly "Immersed Tunnel"! If it was selected for a similar project in Vancouver BC, then why not here?

JCA comment #: 455

IBR Draft SEIS - RECORD #2458 DETAIL

First Name :	Nathan
Last Name :	DeSpain
Attachments :	DSEIS_2458_DeSpain_Original.pdf (29 kb)

IBR Draft SEIS - RECORD #2458 DETAIL

Submission Date :	11/16/2024
First Name :	Nathan
Last Name :	DeSpain
Business/Organization/Agency :	Climate Reality

Submission Input :

First Name:
Nathan

Last Name:
DeSpain

Business or Organization:
Climate Reality

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Induced Demand

Comment:
We don't need more highway expansions. The only thing that decreases congestion in the long run is quality alternatives to driving. At best you will decrease congestion for a little while until folks who are traveling at off hours starts to travel during peak times. At worst you will encourage construction further away from city centers, creating inelastic demand for larger and larger highways. This system of construction is not sustainable in the long term. I don't want me and my children to be faced with a multi billion dollar bill every thirty years. Focusing on safe, effective, pleasant alternatives to driving is a more efficient use of money and energy. We know induced demand quickly negates the value of highway expansion. We know this model of development is economically unstable. If we're taking climate change seriously we need to accept that highway expansions are not the solution.

JCA comment #: 454

IBR Draft SEIS - RECORD #2459 DETAIL

First Name :	Corinna
Last Name :	Rutherford
Attachments :	DSEIS_2459_Rutherford_Original.pdf (3 kb)

IBR Draft SEIS - RECORD #2459 DETAIL

Submission Date : 11/16/2024
First Name : Corinna
Last Name : Rutherford
Business/Organization/Agency :

Submission Input :

First Name:
Corinna

Last Name:
Rutherford

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
Feedback for IBR scope. The SDEIS does not provide sufficient justification for a second auxiliary lane. Replacement should be a streamlined project focused on bridge replacement, transit enhancements, and active transportation. Huge budget going to extensive freeway expansion could be better spent on other transportation infrastructure.

JCA comment #: 453

IBR Draft SEIS - RECORD #2460 DETAIL

First Name :	Corinna
Last Name :	Rutherford
Attachments :	DSEIS_2460_Rutherford_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #2460 DETAIL

Submission Date :	11/16/2024
First Name :	Corinna
Last Name :	Rutherford
Business/Organization/Agency :	

Submission Input :

First Name:
Corinna

Last Name:
Rutherford

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
IBR should plan for even higher capacity transit systems, such as multi-lane Bus Rapid Transit (BRT) or heavy rail, beyond the 2045 Environmental Impact Statement (EIS) horizon. Such that today's infrastructure can adapt to tomorrow's needs.

JCA comment #: 452

IBR Draft SEIS - RECORD #2461 DETAIL

First Name :	Michael
Last Name :	Royce
Attachments :	DSEIS_2461_Royce_Original.pdf (40 kb)

IBR Draft SEIS - RECORD #2461 DETAIL

Submission Date : 11/16/2024
First Name : Michael
Last Name : Royce
Business/Organization/ Agency :

Submission Input :

First Name:
Michael

Last Name:
Royce

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
If the crossing bridge is built, please ensure that it includes mass transit and respectful accommodation for walkers and bikers.

JCA comment #: 451

IBR Draft SEIS - RECORD #2462 DETAIL

First Name :	Paul
Last Name :	Rippey
Attachments :	DSEIS_2462_Rippey_Original.pdf (80 kb)

IBR Draft SEIS - RECORD #2462 DETAIL

Submission Date :	11/16/2024
First Name :	Paul
Last Name :	Rippey
Business/Organization/Agency :	St. Johns Neighborhood Association (but I'm writing as a civilian)

Submission Input :

First Name:
Paul

Last Name:
Rippey

Business or Organization:
St. Johns Neighborhood Association (but I'm writing as a civilian)

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
As we all know, including the DOTs, highway building creates and fuels the automobile culture in the US. But the whole system isn't working. It's broken. We have acres of concrete for cars, and public transport is weak. Everyone loses, even - or especially - the car users. We are wildly out of balance. The excess cost of the IRB (by excess, I mean all the ramps and widening) could go a long way towards strengthening public transport, walking and bikes. But I also need to say, Study having frequent ferries from Hayden Island to Vancouver. They would take some of the stress off the I5 bridges at relatively low cost, would be a plus for the community, and might well work after the earthquake whenever that happens.

JCA comment #: 450

IBR Draft SEIS - RECORD #2463 DETAIL

First Name :	Douglas
Last Name :	Norseth
Attachments :	DSEIS_2463_Norseth_Original.pdf (5 kb)

IBR Draft SEIS - RECORD #2463 DETAIL

Submission Date : 11/16/2024
First Name : Douglas
Last Name : Norseth
Business/Organization/Agency :

Submission Input :

First Name:
Douglas

Last Name:
Norseth

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
I am opposed to the current proposals for the new I 5 bridge. The most important factor is the fact that it apparently will not be seismically sound. Further, as a bicycle commuter who has used that bridge to get to Vancouver, I am very skeptical of the steep incline that will be required to cross that span, on a bike or as a pedestrian. The proposed bridge is as ugly as sin, and of shrinks the clearance for ships going further upstream which should be a nonstarter right there. Finally, creating a huge destructive swathe of concrete right through

the middle of Hayden Island, is both deleterious to the community and so unnecessary. Why aren't you seriously considering a tunnel? Other cities have tunnels under rivers, and we should be doing the same here. It mitigates so many factors such as community destruction, shipping, and I understand that tunnels can be made seismically safe. It feels like the Just Crossing Alliance is trying to ram this particular bridge down the public's throat, come hell or high water. I suggest expanding the commentary period by 3 or 4 months to get renewed input into this project. Let's do it right, not slapdash.

JCA comment #: 449

IBR Draft SEIS - RECORD #2464 DETAIL

First Name :	Cory
Last Name :	Pinckard
Attachments :	DSEIS_2464_Pinckard_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #2464 DETAIL

Submission Date : 11/16/2024
First Name : Cory
Last Name : Pinckard
Business/Organization/Agency :

Submission Input :

First Name:
Cory

Last Name:
Pinckard

Email:
[redacted]

Topic Area:
Transportation

Comment:
Oregon owes a lot of its strengths to rail infrastructure, much of which unfortunately no longer even exists (including the Oregon Electric and Red Electric Interurban Passenger Railways, an elaborate and extensive streetcar grid they interfaced with as well as an integrated bunch of trolley lines.) The turncoat auto industry lobbied to have our taxpayer dollars funded passenger interurban and municipal routes torn out and paved over or else neglected into failure after privatization in acts of premeditated sabotage and treachery; this is before they further betrayed the nation by moving manufacturing out of country decimating the American workforce only to be rewarded for this subversion by being subsidized by our taxes along with being bailed out multiple times only for the executives to pocket the money we were taxed for their personal profits of plunder and pilfering pillage. The further we move away from the logical layout provided by intricate streetcar grids and electric commuter interurban railroads the uglier and less livable the city and its suburbs become. An intelligent coastal city would take advantage of this limited time of people crowding in to install city assets that will benefit us for generations such as a rail route beneath the Willamette meaning the Steel Bridge won't break the light rail circuit interrupting all MAX lines every time it lifts, and railway going between Vancouver and Portland when the new bridge is finally finished. I-5 should be buried on the inner east side stretch to make the area tolerable and reclaim space for the Black community to rebuild their community they had stolen from them. The WES should expand to extend at least down to Salem reuniting the Portland metropolitan area with our capital. It makes perfect sense to build the full Southwest Corridor (Purple) MAX Line (which will connect with the WES dramatically increasing ridership) with railway stations on Marquam Hill and at Portland Community College Sylvania Campus, for example, and zero sense not to.

Electric cars destroy the environment as ICE cars do through resource mining, manufacturing processes and ultimately going to the landfill in mass droves. The pollution they cause is simply unnecessary as is the amount of urban space squandered on parking and other paved over autocentric wastes. MORE VEHICLES ON THE ROAD MEANS MORE AVOIDABLE DEATHS WILL CONTINUE TO CONSTANTLY OCCUR! They also perpetuate redlining, urban sprawl, the food deserts that come from that invariably, along with cities that are not navigable as a pedestrian or bicyclist and are, in fact, hostile to humanity along with being lethally horrendous towards animals. They add to traffic congestion. Commodification of societal needs and normalization of trying to substitute rampant consumerism where we need standardized, regulated and uniform public utilities doesn't work. Profit motive always hurts the public in such cases.

Putting the financial burden of transportation inefficiently and directly on the individual citizen is simply not wise or fair and hasn't been the norm for even 80 years. We need to invest in commuter rail that's properly implemented as it typically is overseas. A commuter rail system is an engineering marvel while buses are just buses. The most reliable predictor of a neighborhood being impoverished is if it has no commuter rail connection. The American people are apathetic through decades of disenfranchisement and a lot of that marginalization (eg Robert Moses's racist urban renewal) is through divestment of public infrastructure, utilities and programs to help the American people. We can't undo the social inequities inflicted upon and retained by redlining until we transcend the highway robbery carcentric built habitat that physically structurally reinforces them. We're past the point of car dominated transportation being anything better than a tragic hindrance or an outright travesty. Public works projects materially improving life for the taxpaying citizenry will bolster civic pride.

Transcontinental High Speed Rail should integrate seamlessly with commuter rail networks so it can evenly function as one cohesive system and this will convert flyover country (CONUS flights should be virtually eliminated) back into a thriving heartland by functioning as an artery of commute and commerce which will reduce clustering on the coasts. Similarly, wholly integrated circuits of commuter rail blended with interurban routes, light rail lines, street car grids, subways, and even trolleys along with electric ferries functioning together as a comprehensive, coherent series of interwoven systems would prevent people from having to live on top of each other in city centers in order to have quick access to urban cores and downtown areas so this would stimulate our local economies and prevent gentrification from demolishing cherished heirlooms of our historicity, destroying our classic neighborhoods, shredding the fabric of our communities and toppling our civic landmarks and architectural heirlooms along with other social capital such as venerable culture generating venues. We lost so many marvelous structures for nothing more than mere surface lots as our city was hollowed out on the heels of white flight to the lily white, poorly planned suburbs. Whole swaths of communities were obliterated in a racist/classist attack on the people of Portland and we lost entire neighborhoods along with cultural centers such as the Jazz District, our Italian and Jewish neighborhoods as well as other minorities who weren't even assisted with any sort of fair, decent assistance to relocate. Proud people were disdainfully discarded as a diaspora of detritus. The absolute annihilation of our city still adversely hinders us collectively to this hamstrung day, particularly the groups targeted intensely, even if so many folk don't know enough to connect the dots of cause and effect.

Numerous studies show that built environments of homogenously bleak and bland duplitecture dreck that profiteering developers push on us for their privatized gains to our public loss for the riches of themselves and corporate slumlords not only cause homelessness from being financially inaccessible to most Americans, but also cause depression from creating such a devastatingly sterile, cold, unloving urban habitat that's too congested and overcrowded to work properly as a correctly engineered built environment. Our roadways are overcrowded and no amount of widening them and adding lanes will do anything to help it because it just leads to induced demand that inevitably grinds to a halt at snags and bottlenecks down the road. Shouldn't American cities be thriving centers of culture and character rather than austere and chintzy morasses of mediocrity?

I believe that we can design the cities of our nation to reflect a future that embraces humanity and that we also must for America to have any sort of a bright future ahead of it. Right now we are mired in the destruction of our cities from the inward attacking neocolonial oppressors who weaponize their clout of wealth against the nation for their own off-shore un-American gains of privileged, parasitic, private profits. This greed fueled anti-social exploitation is present day feudalism driving us into another gilded age. Tons of new petrochemical building "luxury living" housing units remain empty serving only as financial assets in investment portfolios of hedge fund, "private equity" and permanent capital firm cretins sheltering dubiously acquired wealth instead of as direly needed shelter for humans. We deserve a landscape we can be proud of and country should come first before corporate looting and exploitation. Legacies are important and live on forever.

With space opened up in our cities we could rebuild beloved structures now gone missing from economic and environmental disaster utilizing new technologies such as hempcrete and 3-D printing. We could create vertical agriculture, green pocket areas, etc. on spots currently now just serving as paved over squares and nothing more. 20% of Portland is parking lots and paved over area not even suitable for that inefficient usage. We can extend democracy into offering the taxpayer residents democratic say in what their city consists of, how it looks and how it operates promoting civic engagement and participation.

JCA comment #: 448

IBR Draft SEIS - RECORD #2465 DETAIL

First Name :	Deborah
Last Name :	Del Toro
Attachments :	DSEIS2465_Del_Toro_Original.pdf (5 kb)

IBR Draft SEIS - RECORD #2465 DETAIL

Submission Date :	11/16/2024
First Name :	Deborah
Last Name :	Del Toro
Business/Organization/Agency :	Henderson & Daughter Windows and Doors

Submission Input :

First Name:
Deborah
Last Name:
Del Toro
Business or Organization:
Henderson & Daughter Windows and Doors
Email:
[redacted]
Phone:
[redacted]
City:
[redacted]
US States:
[redacted]
Zip:
[redacted]
Topic Area:
Hayden Island Issues
Comment:
I have lived on the island since the late70's and still reside here. I am still working and need to meet with customers throughout the day, which involves multiple trips back and forth across the I-5 bridge. I think all of the island residents should receive a special discounted toll pass for unlimited commuting into Vancouver since we basically must leave the island to do anything for business, family, shopping and emergencies which will involve any medical issue also. We also could be seriously impacted for any 911 response during the 10-year estimated construction project for the bridge. I feel all of these issues are critical.
JCA comment #: 447

IBR Draft SEIS - RECORD #2466 DETAIL

First Name :	Chris
Last Name :	Herman
Attachments :	WA_Public_Ports_Assn_Original.pdf (127 kb) image001.jpg (18 kb) image002.jpg (3 kb) 11.15.24 DSEIS WPPA Public Comment Final.pdf (689 kb)

November 15, 2024

Interstate Bridge Replacement Program
ATTN: Greg Johnson, Program Administrator
500 Broadway, Suite 200
Vancouver, WA 98660

RE**: Washington Public Ports Association Comments on the Interstate Bridge Replacement Program Draft Supplemental Environmental Impact Statement**

Dear Mr. Johnson:

On behalf of our seventy-five public port districts across the state, the Washington Public Ports Association (WPPA) is pleased to be able to provide comments on the Supplemental Draft Environmental Impact Statement (DSEIS) for the Interstate Bridge Replacement Program (IBR). The importance of this infrastructure, and this project, to public port districts, north and south on Interstate 5, and from the mouth of the Columbia River to port districts located on the Snake River in the Lewiston, ID/Clarkston, WA valley cannot be overstated. Currently recognized as one of the worst bottlenecks for freight movement in the Pacific Northwest, the IBR provides us an opportunity to improve not only regional mobility but the capacity and capability for the movement of goods as varied and complex as wind blades measuring greater than 165 feet in length. We recognize the many complexities related to the IBR project and appreciate the diligence and thoroughness you and your team have exhibited in completing this important work.

Thank you for recognizing the current conditions which include congestion, impaired freight movement, existing seismic vulnerabilities and steadily increasing regional travel demand as critical elements of the purpose and needs of the IBR. These are real concerns that impact the ability of public port districts to be successful in our mission to sustain economic growth across Washington. But they also limit the ability of communities in our region, and not just in Southwest Washington, to thrive. In addition to the existing current conditions, we would ask you to consider the inclusion of sustained use of the Columbia-Snake River System, also known as the Marine Highway 84 (M-84), for waterborne cargo movement into this important section of the DSEIS. We also encourage continued close coordination with IBR's neighbor, the Port of Vancouver USA (POV). The Port of Vancouver Waterfront Development Master Plan, as well as the port's Comprehensive Scheme of Harbor Improvements, highlight existing development and future growth scenarios which are relevant to both the future design and capability of the IBR. We encourage continued close coordination with POV to achieve these mutual goals.

Local investments and improved access to Vancouver's waterfront must not be compromised. Limitations exist within the current conditions which were created in the past and those limitations should be prioritized for reconnection with the IBR. For example, better connectivity between the thriving Vancouver Waterfront and the Fort Vancouver National Historic Site. In this way, the program can improve freight mobility and the regional economy broadly, but can also have immediate positive impacts to the most directly-adjacent and directly-impacted neighbors.

Thank you for recognizing in Chapter 3 that freight using IBR will increase 50 percent by 2045. This means freight volume is expected to grow more rapidly than general purpose traffic and will account for 15 percent of total traffic by 2045. To support this growing demand, WPPA recommends evaluating multiple auxiliary lanes in each

direction. The design criteria and size of auxiliary lanes will be critical to freight movement, particularly high/wide/heavy cargo. As further evaluation of auxiliary lanes continues, we strongly recommend continued collaboration with the broad coalition of freight stakeholders that have been included in your outreach to date.

As stated earlier, the competitiveness of public ports and indeed entire industries across Washington rely on access to, and efficient transit on, the M-84 marine highway that encompasses the Columbia and Snake Rivers. River navigation must be protected. Wherever possible, restrictions and construction windows should be communicated as early and as widely as possible. Many important details are yet to be decided. WPPA again encourages continued collaboration and outreach as critical decisions related to river navigation are finalized.

Thank you again for allowing us to provide the perspective of Washington's seventy-five public ports into the comments on the IBR DSEIS. We appreciate the complexity of the task in front of you and your team. Please reach out to us if you have any questions.

Sincerely,

Eric ffitch
Executive Director
Washington Public Ports Association

November 15, 2024

Interstate Bridge Replacement Program
ATTN: Greg Johnson, Program Administrator
500 Broadway, Suite 200
Vancouver, WA 98660

RE**: Washington Public Ports Association Comments on the Interstate Bridge Replacement Program Draft Supplemental Environmental Impact Statement**

Dear Mr. Johnson:

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Thank you for recognizing in Chapter 3 that freight using IBR will increase 50 percent by 2045. This means freight volume is expected to grow more rapidly than general purpose traffic and will account for 15 percent of total traffic by 2045. To support this growing demand, WPPA recommends evaluating multiple auxiliary lanes in each

direction. The design criteria and size of auxiliary lanes will be critical to freight movement, particularly high/wide/heavy cargo. As further evaluation of auxiliary lanes continues, we strongly recommend continued collaboration with the broad coalition of freight stakeholders that have been included in your outreach to date.

As stated earlier, the competitiveness of public ports and indeed entire industries across Washington rely on access to, and efficient transit on, the M-84 marine highway that encompasses the Columbia and Snake Rivers. River navigation must be protected. Wherever possible, restrictions and construction windows should be communicated as early and as widely as possible. Many important details are yet to be decided. WPPA again encourages continued collaboration and outreach as critical decisions related to river navigation are finalized.

Thank you again for allowing us to provide the perspective of Washington's seventy-five public ports into the comments on the IBR DSEIS. We appreciate the complexity of the task in front of you and your team. Please reach out to us if you have any questions.

Sincerely,

Eric ffitch
Executive Director
Washington Public Ports Association

IBR Draft SEIS - RECORD #2467 DETAIL

First Name :	Russ
Last Name :	Pascoe
Attachments :	DSEIS-2467_Pascoe_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #2467 DETAIL

Submission Date : 11/15/2024
First Name : Russ
Last Name : Pascoe
Business/Organization/Agency :

Submission Input :

Please enter my comments in your process, thank you.
Russ Pascoe

Auditory, visual, and air quality impacts on single and multi-family residential units, commercial properties, and Arnada Park. To mitigate adverse impacts, the ANA will advise project planners on sound wall construction, height, and aesthetics.

Trees will be planted in the neighborhood and adjacent areas to replace those that will be removed for construction. They will be planted as soon as remaining construction will not damage them. The project will insure the survival or replacement of the trees for 10 years.

The sound wall will receive the highest standard anti-graffiti coating available at the time of its construction, and the project will ensure funding for graffiti removal for 25 years from date of completion.

Construction vibration impacts. To mitigate adverse impacts of construction vibrations, the project will provide vibration monitoring for buildings and streets from D Street east to the freeway within the neighborhood boundaries. Any damage that occurs will be repaired promptly at project expense.

Project construction will *utilize portions of Arnada Park as a staging area*. To mitigate adverse effects such as construction equipment and material storage the park will be returned to the state it was in when staging commenced.

I am concerned that a design is not yet available for the Fourth Plain Boulevard overpass and interchange adjacent to the neighborhood. *The ANA will have input on the overpass and interchange design when available.*

I advocate for construction of the proposed community connector between

downtown Vancouver and the Vancouver National Historic Reserve to ensure that the IBR does not worsen the existing I-5 separation between these two important community resources.

I oppose tolling my neighborhood's residents until the project is complete. I expect to pay bridge tolls after the Bridge is finished and all modifications to I-5 are completed. Until that time we expect to live with dirty air, construction noise and vibration, a smaller and less safe park and likely a decade of traffic jams. We cannot accept tolls along with these afflictions. We require a toll exemption for Arnada residents until completion.

IBR Draft SEIS - RECORD #2468 DETAIL

First Name :	Douglas
Last Name :	Darling
Attachments :	DSEIS2468_Darling_Original.pdf (4 kb)

IBR Draft SEIS - RECORD #2468 DETAIL

Submission Date : 11/15/2024
First Name : Douglas
Last Name : Darling
Business/Organization/Agency :

Submission Input :

First Name:
Douglas
Last Name:
Darling
Business or Organization:
Owner of a business
Email:
[redacted]
City:
[redacted]
US States:
[redacted]
Topic Area:
Transportation
Comment:
Dig a tunnel! Alone Musk just invented a new boring machine and did a project in Las Vegas and came in at half the time and half the budget!
Two men here in Portland did an independent study showed it to the residents of Hayden Island and invited the city council of Portland to prove that this was the best solution! City of Portland had all the numbers incorrect and were proven wrong on there original estimates!
STOP WASTING OUR TIME AND MONEY! Leave the bridge and dug a bypass tunnel! Certainly the BEST SOLUTION!
JCA comment #: 446

IBR Draft SEIS - RECORD #2469 DETAIL

First Name :	Ashwin
Last Name :	Datta
Attachments :	DSEIS2469_Datta_Original.pdf (5 kb)

IBR Draft SEIS - RECORD #2469 DETAIL

Submission Date : 11/15/2024
First Name : Ashwin
Last Name : Datta
Business/Organization/Agency :

Submission Input :

First Name:
Ashwin
Last Name:
Datta
Email:
[redacted]
Phone:
[redacted]
City:
[redacted]
US States:
[redacted]
Zip:
[redacted]
Topic Area:
Transportation
Comment:
Hello ODOT,
Please don’t try to simply appease people with MAX plans that don’t actually work. We need transit access to be multimodal (cycling, walking and bus access). It should honestly be easier to take transit than drive, which is why the bridge needs to be right-sized. I am shocked that, in this day and age, a transportation agency still falsely believes that adding lanes will solve a problem, especially when the data on traffic counts is not actually increasing. Oh wait, that’s why your consultants falsified the data to justify this aim.
Stop with this nonsense and focus on making the bridge one that prioritizes transit, walking/biking, and disaster resiliency over cars. And one that allows for future expansions of this transit (like MAX 4-car trains) and other transportation such as heavy rail.
JCA comment #: 445

IBR Draft SEIS - RECORD #2470 DETAIL

First Name :	Chris
Last Name :	Smith
Attachments :	DSEIS2470_Smith_Original.pdf (784 kb) Construction_-The-truth-about-whats-happening-on-Americas-roads-is-hard-to-believe.-Now-what_.pdf (9 mb)

IBR Draft SEIS - RECORD #2470 DETAIL

Submission Date :	11/15/2024
First Name :	Chris
Last Name :	Smith
Business/Organization/Agency :	
Attachments :	Construction_-The-truth-about-whats-happening-on-Americas-roads-is-hard-to-believe.-Now-what_.pdf (9 mb)

Submission Input :

First Name:
Chris
Last Name:
Smith
Business or Organization:
personal comment
Email:
[redacted]
Phone:
[redacted]
City:
[redacted]
US States:
[redacted]
Zip:
[redacted]
Topic Area:
Induced Demand
Comment:
The DSEIS itself includes no discussion of induced demand (topic not found in index).
The Transportation Technical report has some discussion of “induced development” (i.e., land use changes) increasing travel demand (based largely on a 14-year-old memo from Metro in Attachment G) but ultimately concludes that land use plans already anticipate completion of the project (p. 6-1).
There are multiple mechanisms behind induced demand that are included nowhere in the DSEIS.
The attached article How America Can Break Its Highway Addiction"" includes discussion of examples of Induced Demand from decades ago.
Attachment (maximum one):
Construction_-The-truth-about-whats-happening-on-Americas-roads-is-hard-to-believe.-Now-what_.pdf
JCA comment #: 444

SLATE

C'MON, MAN!

METROPOLIS

How America Can Break Its Highway Addiction

In the 1980s, an unlikely alliance slowed the construction of nature-destroying dams. We just might be able to pull it off again.

BY DAVID ZIPPER

AUG 28, 2024 • 5:40 AM

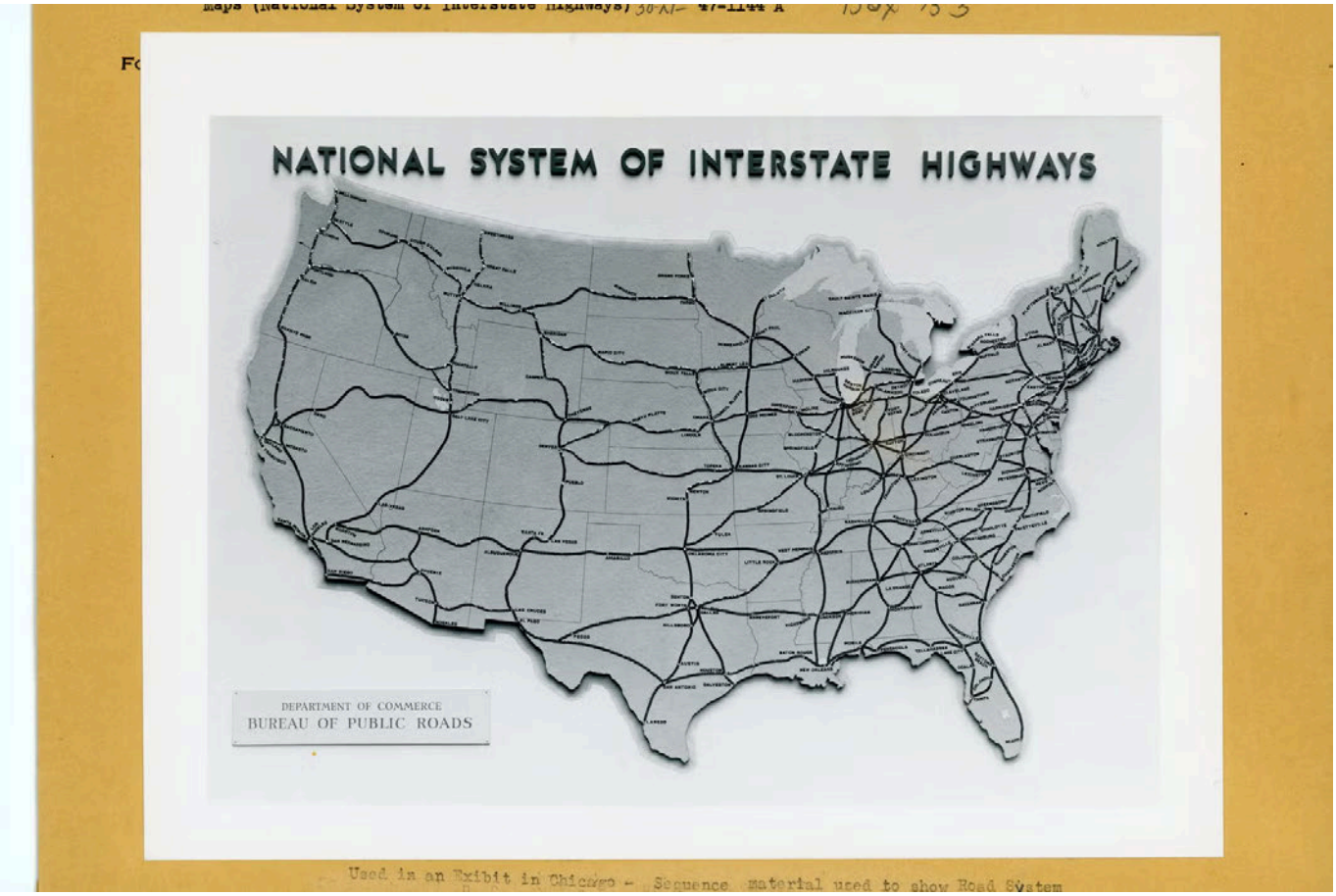
The neighborhood of Allendale, in Shreveport, Louisiana, lies just west of downtown. Long a nexus for northern Louisiana's Black community, Allendale's population is now just over 4,000, down from 12,000 in 1980. But there are newer developments in the area, such as the public housing complex that opened earlier this year, and a number of homes where families resettled after fleeing Hurricane Katrina in 2005. Allendale's gems include a park standing atop the site of a Civil War fort and a 19th-century waterworks, now a museum and a national historic landmark, that is the last steam-powered municipal water treatment plant in the United States.

All these structures could soon fall prey to a bulldozer. The reason: A proposed 3.5-mile highway, the I-49 Inner-City Connector, would smash through Allendale, wreaking havoc on everything in its path. "State officials call it 'the Connector,' " said Kim Mitchell, a Shreveport architect who has been fighting the project, "but it's really a divider—because it isolates Allendale."

Some of the Connector's boosters seem to see leveling Allendale itself as a reason to build the road. "The area that it covers is a lot of blighted area. It could be revitalized," Greg Tarver, a Louisiana state senator, told Bloomberg CityLab last year. The project's estimated budget: $865 million.

Those costs, both financial and human, are supposedly justified by the faster trip times that the Connector would offer. According to a 2016 study by the Northwest Louisiana Council of Governments, drivers who use the Connector would save an average of three minutes of travel time. (The study does not mention that Shreveport's traffic delays are already the lowest among Louisiana's four major metro areas, including New Orleans, Baton Rouge, and Lafayette.)

From San Bernardino to Austin to Cape Cod, state transportation departments are pouring billions of dollars into highway expansions that upend communities and damage the planet, all in a quixotic quest to conquer congestion. Entirely new highways are under discussion too, often with bipartisan backing, such as I-14, promoted by Sens. Ted Cruz of Texas and Raphael Warnock of Georgia, that would slice across the Gulf Coast from Midland, Texas, to Augusta, Georgia. In 2022 federal, state, and local governments spent $127.9 billion on highway construction, nearly twice the amount that went toward maintaining public roads —some 43 percent of which were rated in "poor" or "mediocre" condition, according to a 2021 report by the American Society of Civil Engineers.



Department of Commerce Bureau of Public Roads

The thing is, Americans already have access to 4.2 million miles of public roads, including an interstate system, completed in 1992, that can generally carry them anywhere they might like to go. It's unclear why, exactly, the country should prioritize further enlarging its highway network over repairing pavement that is in disrepair. The kicker is that, contrary to the promises of state transportation departments, new and expanded highways like the I-49 Connector consistently *fail* to reduce congestion. Instead of smoothing traffic flows, the added asphalt compels more people to drive until gridlock on the widened roadway is as thick as before. The supply of cars will, consistently, rise to meet—then clog up—the

available lanes. Solutions that can truly mitigate congestion, like improving transit service, implementing congestion pricing, and encouraging dense development, are often brushed aside as impractical. Instead, the U.S. is hooked on paving more and more highways, making old ones bigger, and adding new bits and bobs to the existing networks.

"We don't have a U.S. Department of Transportation," Democratic Massachusetts Rep. Jake Auchincloss told me. "We have a U.S. Department of Highways."

America's addiction to road construction goes back decades, enabled by naive policymaking, self-serving industry groups, and myopically trained highway engineers. Kicking that addiction is a Herculean task—but not an impossible one. We've been on a destruction course with excessive infrastructure before, and it nearly cost America the Grand Canyon. We corrected course then. The moment ahead of us is no less pivotal.

* * *

At first, the paths that connected cities were made of dirt, gravel, and sand. The Ford Model T's explosive success during the 1910s was partly due to its durability in terrible roadway conditions. In his book *Divided Highways*, Tom Lewis writes that the Model T offered "high axles and three-and-a-half-inch-wide tires, the better to traverse roads cut deep with ruts made by farm wagons." Still, it was apparent that smoother surfaces would enable faster travel in these newly popular machines.

Sensing an opportunity to turbocharge the U.S. economy, the federal government began to fund roadway construction directly. The Bureau of Public Roads, formed in 1915, spent $750 million on roads in the 1920s. In 1924, Lewis recounted, the bureau's leader Thomas MacDonald shared his vision for the future: "My aim is this. We will be able to drive out of any county seat in the United States at 35 miles an hour and drive into any other county seat—and never crack a spring."

MacDonald and his team were backed by a powerful corporate alliance that included the auto, asphalt, concrete, and rubber industries. With their support, states and the federal government established gasoline taxes, whose revenues would be used solely for roads, providing an ongoing and secure funding source for future construction.

Creatively designed roadways captured the public's imagination, such as the first cloverleaf interchange, erected in Woodbridge Township, New Jersey, in 1928, which allowed drivers to move between two highways without crossings or left turns. At the 1939 World's Fair in New York, Norman Bel Geddes' utopian vision of a nation crisscrossed by immaculate,

congestion-free roads drew massive crowds to the General Motors booth. Upon exiting, 5 million visitors were given a pin that declared: "I Have Seen the Future."

American highway construction went into overdrive after World War II, as an expanding middle class moved into car-centric suburbs. In 1956 the Federal Highway Act launched the interstate system, a civic commitment to provide rapid, smooth travel between major cities nationwide.

Clover Leaf Intersection Routes 4 and 25 near Woodbridge Township, New Jersey. Bettmann/Getty Images

But that still left open the question of car trips *within* urban areas, which occurred largely on roadways with stoplights and intersections that constrained traffic speeds. Although President Dwight Eisenhower made clear in a 1960 White House meeting that he did not intend for new interstates to bulldoze their way through urban neighborhoods, an alliance of highway engineers, chambers of commerce, and city officials effectively overrode him, designing routes that leveled low-income and minority neighborhoods while leaving affluent and white communities intact. That was no accident; local leaders saw the new interstate system as a golden opportunity to expunge "blight," which they claimed acted as a barrier to development.

In Miami, for example, Overtown was the traditional heart of the city's Black community, with jazz clubs hosting the likes of Ella Fitzgerald, Josephine Baker, and Nat King Cole. Highway engineers targeted Overtown as the site of a massive interchange connecting I-95, I-395, and State Road 836, displacing half of Overtown's population by 1965. For decades, Overtown residents mourned what they had lost. "I get choked up every time I talk about it, just like my dad used to get choked up," Naomi Rolle told WLRN, the South Florida PBS affiliate, in 2013. "In 1965 they ran him out of that house."

Interstate 95 in January 2022 in Miami. Joe Raedle/Getty Images

Those who pushed back against urban highway projects were reminded that, as Robert Moses, the master builder of roads like New York's Cross Bronx and Long Island expressways, liked to say, "you can't make an omelet without breaking some eggs." The "omelet" in this case was faster car trips. Lewis writes that John Volpe, a federal official charged with overseeing the nascent interstate system, instructed his engineers to "concentrate on the urban sections of the system, since cities had the greatest traffic congestion."

But there was a problem: New urban highways had a pesky habit of filling up with traffic almost as soon as they opened. A classic example was the Van Wyck Expressway, which Moses built in Queens in 1950. As recounted in Robert Caro's book *The Power Broker*, Moses promised that "traffic would flow freely" following the expressway's construction. Instead, residents found that "the new road had not freed them from the trap of daily travel," Caro writes. "It had closed the trap on them more firmly than ever, for new traffic, generated by the new road, was also jamming the local streets."

The phenomenon Caro described is now known as induced demand. On new highways like the Van Wyck, the added road space can at peak times persuade people to drive who might

otherwise have left earlier or later in the day, or taken transit, or perhaps not traveled at all. The result is an endless cycle in which congestion leads to highway expansion, which invites more peak-hour trips, which brings back traffic, and so on. The pattern is so inevitable that economists have dubbed induced demand the "iron law of congestion." According to a recent report by Transportation for America, an advocacy group, the 100 largest urbanized areas expanded their total lane miles 42 percent between 1993 and 2017 (equivalent to more than 30,000 miles of lanes), exceeding their collective 32 percent population growth during that time. Despite all that road construction, total delays in those regions skyrocketed 144 percent.

Today few urban highways are proposed as a solution for blight (Tarver, the Louisiana state senator and backer of the I-49 Connector, being an exception). But many are, despite all the evidence, promised as a congestion cure. Maryland's transportation department, for instance, describes its proposed widening of I-270 northwest of Washington as a "traffic relief plan." Marylanders should be skeptical of such framing. A more common experience from highway widening can be found in Houston, where the $2.8 billion that the Texas Department of Transportation spent in 2011 to broaden the Katy Freeway to as many as 26 lanes resulted in traffic being worse than ever. TxDOT now wants to spend $740 billion—more than the gross domestic product of Belgium—on transportation in the next 25 years, with "congestion relief" one of its key goals. Some $160 billion would be spent solely on doubling the size of existing two-lane roads.

Katy Freeway in Houston in 2013. Smiley N. Pool/Houston Chronicle/Getty Images

Because of induced demand, this Sisyphean struggle against congestion is an expensive boondoggle. Worse, the added miles of highway lanes act as an accelerant for climate change. Beyond transporting more cars—99 percent of which in the U.S. run on gasoline alone—bigger highways nudge people to move to more spacious homes on the urban periphery, where cars are often the only means of reliable transport. The result is an increase in total driving, with greenhouse gas emissions rising in lockstep, along with other forms of pollution, like tire particulates, which can kill fish when they leach into fresh water.

This tight link between highway construction and car pollution has led environmental groups to push back against roadway-widening projects. "Highway expansions that cram even more cars onto congested roads are undermining our climate goals," declared the Natural Resources Defense Council in a post earlier this year.* Car drivers, meanwhile, are left just as exasperated by gridlock as they were before.

As destructive and pointless as highway construction can be, it continues to appeal to broad swaths of the public—and to elected leaders. "Expanding highways doesn't reduce congestion, but it sounds like it should," said Beth Osborne, the director of Transportation for America. "And by the time it fails, that politician won't be there anyway."

Part of the problem is that many highway engineers are obsessed with congestion but reject induced demand, which leads them to focus on roadway expansion—not denser development or expanded transit service—in a doomed effort to keep traffic flowing. After all, laying pavement is what highway engineers and their computer models are trained to do. "Engineers rely on [congestion-projection estimates] whenever they want to sell us a bigger and supposedly better road," wrote University of Colorado Denver urban planning professor and engineer Wes Marshall in his book *Killed by a Traffic Engineer*.

As powerful as America's highway addiction is, the current predicament is not hopeless. In fact, just a few decades ago, the United States managed to break a comparably catastrophic infrastructure habit: dam construction.

* * *

A hundred years ago, dams, like highways, offered tantalizing benefits to a burgeoning nation. With electricity demand soaring, dams could produce vast

quantities of cheap power by harnessing the water flowing through them to turn a turbine: The Grand Coulee Dam, built during the Great Depression atop the Columbia River, generates 21 billion kilowatt-hours of electricity a year, enough to power 2 million homes. By blocking the natural flow of rivers and streams, dams created reservoirs to provide a reliable source of water for irrigation; in the arid Southwest, they could practically conjure breadbaskets out of desert. Where dams were, people could live, work, and produce. The colossal Hoover Dam, along the Nevada–Arizona border, transformed 1.5 million acres of scrub into farmland—and tamed the flood-prone Colorado River too.

Dams can be built in any number of ways, but they fundamentally involve blocking the free flow of a river with a structure that forces water to pool behind it, creating an artificial lake that can be used for agriculture or human consumption (and sometimes for recreation as well). More than 10,000 dams were erected in the U.S. from 1920 to 1949 by the Bureau of Reclamation and the Army Corps of Engineers, which collaborated with industry partners in sectors like construction, engineering, and concrete. Many of those dams provided massive quantities of jobs; some 21,000 people helped build Hoover Dam alone.

As Marc Reisner describes in *Cadillac Desert: The American West and Its Disappearing Water*, dam proponents like Franklin Lane, Woodrow Wilson's interior secretary, spoke with religious fervor: "The mountains are our enemies. We must pierce them and make them serve. The sinful rivers we must curb." Everybody west of the Mississippi seemed to want a dam nearby, from farmers searching for cheap water to speculators anticipating a spike in land values to politicians eager for ribbon cuttings. "If there was a stretch of free-flowing river anywhere in the country, our reflex action was to erect a dam in its path," Reisner writes.

But there was a problem: No amount of dam building seemed capable of quenching the West's thirst for water.

"When you added a couple of lanes to a freeway or built a new bridge, cars came out of nowhere to fill them," Reisner writes. "It was the same with water: the more you developed, the more growth occurred, and the faster demand grew." To encourage more development in the Southwest, the Bureau of Reclamation once proposed piping water from the Pacific Northwest to the Mexican border, a distance of 1,000 miles.

View of O'Shaughnessy Dam and Hetch Hetchy Reservoir, in California. Keystone View Company/Library of Congress

In their race to build, dam engineers worried little about the calamitous impact their creations were having on local ecosystems. John Muir, the famed naturalist and founder of the Sierra Club, railed against the O'Shaughnessy Dam, which in 1923 flooded the bucolic Hetch Hetchy Valley. A "natural paradise," according to the San Francisco Chronicle, Hetch Hetchy was thought to be as beautiful as Yosemite, only a few miles away. Muir was devastated by its destruction, lamenting, "Dam the Hetch Hetchy! As well dam for water tanks the people's cathedrals and churches, for no holier temple has been consecrated by the heart of man."

The ecological toll of dam building was immense. Neither overfishing nor pollution, writes David Wilcove in his book *The Condor's Shadow*, "has endangered as many species of fish, mussels, amphibians, and crayfish as has habitat destruction." Birds were at risk too, since dams often destroyed the wetlands where they would feed and breed.

When engineers did try to mitigate the damage to wildlife, their efforts could be almost comically hapless. Wilcove describes fish ladders installed on dams in the Columbia River that allowed adult salmon to travel upstream but offered no accommodation for juveniles

heading in the opposite direction, leading local populations to collapse. That basic design flaw was repeated eight times over a period of 40 years.

The consequences of depleting salmon populations can be felt way up the food chain. Ben Goldfarb, a nature journalist who is currently writing a book about fish, noted that dams still affect the orcas that inhabit the Salish Sea off Washington state and British Columbia. "The orcas are basically failing," he told me. "They're not reproducing, and their population is declining. The biggest factor affecting these orcas is starvation because of the decline of Chinook salmon—which is because of the dams upriver."

Nonetheless, Congress kept the money flowing for dam development. "The whole business was like a pyramid scheme—the many (the taxpayers) were paying to enrich the few—but most members of Congress figured that if they voted for everyone else's dams, someday *they* would get one too," Reisner writes. "Water projects came to epitomize the pork barrel; they were the oil can that lubricated the nation's legislative machinery." To keep legislators on their side, federal officials would imply that a project in their district would break ground soon, as long as Congress continued approving appropriations.

By the latter half of the 20th century, most of the best sites for dams—the places where hydropower or irrigation could produce a solid return on investment—already had one. "By then, you've basically built all the dams that you can easily," said Donald Jackson, a professor at Lafayette College who studies the history of engineering. "There isn't more water you can profitably store, and then people realize there aren't that many free-flowing rivers."

That did not stop Big Dam. Over 11,000 dams were built in the 1950s—more than during the previous three decades combined.

Pushback, though, was brewing. After World War II, the Bureau of Reclamation proposed building the Echo Park Dam on Utah's Green River. The project would entail flooding most of Dinosaur National Monument, a park that now covers 210,000 acres and offers river rafting, cross-country hiking, and a chance to view ancient petroglyphs as well as 1,500 dinosaur fossils embedded in rock. Outrage followed. "Shall We Let Them Ruin Our National Parks?" asked a 1950 article in the Saturday Evening Post. Facing mounting opposition, much of it stoked by a fiery new leader of the Sierra Club named David Brower, the bureau dropped those plans and instead built the Glen Canyon Dam, which created Lake Powell.

The fight between environmentalists and dam builders escalated in the 1960s, after the bureau proposed damming the Colorado River next to another U.S. treasure: Grand Canyon

National Park. Brower's Sierra Club fought those plans with everything it had, placing a full-page ad in the New York Times in 1968 that read, "If They Turn Grand Canyon Into a Cash Register Is Any National Park Safe?" Grand Canyon was spared. "The Bureau of Reclamation engineers are like beavers," Brower told John McPhee in *Encounters With the Archdruid*. "They can't stand the sound of running water."

Brower's efforts to curb the beaverlike engineers steadily gained allies in Washington, as the federal government started to assert itself in the battle over water projects. The 1968 Wild and Scenic Rivers Act protected waterways like the Missouri, Snake, and Delaware rivers from exploitation, and the 1970 National Environmental Policy Act created new approvals that slowed dam construction and made it more expensive. "It simply got to the point where it cost too much to build new dams," said Dan Beard, who oversaw the Bureau of Reclamation as a Department of the Interior official in the 1970s.

Still, Big Dam remained a potent force on Capitol Hill. As Reisner details in *Cadillac Desert*, in the late 1970s, President Jimmy Carter tried to kill 18 dam projects that seemed especially ill-conceived. Beard, who worked on Carter's presidential transition team, said that this "hit list" of dams slotted for cancellation sparked a firestorm in Washington when the press got hold of it. "These were dogs—I mean, just terrible projects," Beard said. "But you've got these titans of the Senate, people like John Stennis, absolutely going crazy." Although controlled by fellow Democrats, Congress brushed Carter aside and funded most of the dam projects anyway.

But there is a force that can trump even the most determined troop of engineers and their backers—and that's money problems. A soaring national debt prompted Republicans like President Ronald Reagan to seek budget cuts, laying the groundwork for an unlikely collaboration between fiscal conservatives and environmentalists that finally brought Big Dam to heel.

"It was pretty strategic," said Beard, who worked on water and environmental issues for Democratic congressman George Miller in the 1980s after leaving the Carter administration. "The environmentalists said, 'We have a core base of support, but we're not the majority. Who are the logical people to add to the coalition?' It's these guys wandering around, saying we've got to balance the federal budget."

The fiscal prudence argument proved to be a welcome complement to environmentalists' ecological concerns. "When groups like the National Taxpayers Union came on and said, 'This is a waste of federal money,' that gave a really tangible argument for people to grab hold of," Beard told me.

What Reisner called a “discrete alliance” of environmentalists and fiscal hawks backed the 1986 Water Resources Development Act, which forced local governments to fund a chunk of future dam projects themselves. Beard said that bill never would have become law without support from Republicans like Tom Petri, a Wisconsin representative at the time. “He was this sort of noble warrior about dams, saying, ‘This is wrong! This is wrong!’ ” Beard said, chuckling. “We were like, ‘Yeah, well, we all know it’s wrong.’ ”

Department of Commerce Bureau of Public Roads

With the adoption of dam cost sharing in the 1980s, Reisner writes, “the pork barrel seemed finally to have lost its anchorings.”

A little more than 200 dams were erected annually between 2000 and 2021—the lowest figure since the 1920s—and most were a shadow of earlier behemoths. “I can’t think of a major facility built in the last 40 years that’s of the nature we built before,” Beard said.

In many places, the current trend is toward dam removal. In 2023 some 80 dams were dismantled, seeding hopes of an ecological comeback in watersheds like the Klamath River, in Oregon and California. In total, over 300 dams have now been removed from the Pacific Coast states.

For the moment, Big Highway feels every bit as powerful—in red states as well as blue—as Big Dam was in its heyday. But two generations ago, we broke our addiction to dams. The same could happen with our ever-widening highways.

* * *

Even in deep-blue states, a bipartisan coalition keeps the highway funding spigot open, said Amy Lee, a postdoc at the University of California, Los Angeles who wrote her dissertation about California's failure to constrain highway growth. "The construction-materials companies tend to be very big on the right, and organized labor tends to be very powerful on the left," she said, and these forces form a pro-highway juggernaut. In January, a coalition of construction companies and labor groups sent a letter to California's top elected leaders defending "funding for infrastructure projects that may potentially increase vehicle miles traveled"—i.e., highway expansions. (The Laborers' International Union of North America did not respond to repeated requests for comment for this article.) As with electric vehicles, highway construction seems to be a topic in which environmental and union interests diverge.

Transportation departments don't want to hear *no* on highways. In 2022 Oklahoma's department of transportation preemptively bought 23 web domains, like oklahomansagainstturnpikes.com and stoptheeasternloop.com, that could theoretically be used to rally opposition to the state's $5 billion highway plan. Speaking up against pavement within a department can be difficult and risky. Last year, Jeanie Ward-Waller, a Massachusetts Institute of Technology–trained engineer who served as the deputy director of planning and modal programs for California's Caltrans, was demoted after questioning her agency's plans to widen I-80 between Sacramento and Davis. In an editorial published in the San Francisco Chronicle, Ward-Waller wrote, "My concerns were repeatedly brushed off by my bosses, who seemed more concerned about getting the next widening project underway than following the law."

At the federal level, even asking questions about the collective climate impact of highway building appears verboten. In 2022 Stephanie Pollack, the acting head of the Federal Highway Administration, called on state DOTs to measure the carbon emissions attributable to their highway systems. Republicans were incensed; 21 states filed a suit, and Republican Senate Minority Leader Mitch McConnell advised governors to simply ignore her.

Democrats have supported highway expansions too. The White House called the Bipartisan Infrastructure Law "a critical step towards reaching President Biden's goal of a net-zero

emissions economy by 2050," but subsequent analysis by Transportation for America found that state DOTs used nearly a quarter of the $270 billion they received through the law to expand highways, a move sure to increase emissions. (After the infrastructure bill was passed, the head of Louisiana's transportation department said that "some of the winners I think from this project funding will be things like the Inter-City Connector," referring to the Shreveport project.)

With so many forces pushing for roadway expansions, opposing them requires political bravery. Decades ago, the costs of opposing dam construction were also steep: After the Sierra Club took out the ad that helped save the Grand Canyon, the organization's tax-exempt status was revoked for lobbying. Brower was subsequently forced out, but he harbored few if any regrets. And in the long run, he won.

Look closely at the fight now playing out against highways, and there are signs of progress. For years, the environmental movement, which played such a pivotal role corralling American dam building, was focused more on improving automobile fuel economy and promoting electric vehicles than reducing the total amount of driving. In recent years, however, a number of groups have become vociferous critics of highway construction. In February, a coalition of 199 nonprofits, including national heavyweights like the Sierra Club as well as local groups such as Sustainable Claremont, called on elected leaders to "adopt a moratorium on expanding highways and a pause on existing projects until climate, equity, and maintenance goals are met." In Colorado, lobbying from environmental groups pushed state officials to link transportation funding—including money for highways—to reductions in greenhouse gas emissions. A few months ago, environmental groups including the Natural Resources Defense Council filed a lawsuit to block California's DOT from expanding I-80 near Sacramento (the project that allegedly cost Ward-Waller her job).

I-70 near Glenwood Springs and the Colorado River—the final stretch of the Interstate Highway System. Joe Sohm/Visions of America/Universal Images Group/Getty Images

What has been missing is an alliance between environmentalists and fiscal conservatives like the one that restrained Big Dam in the 1980s. Although some MAGAfied Republicans may worry little about squandering public money on futile projects, those committed to smaller government could be willing to listen—particularly as highway construction costs have surged 63 percent from 2019 to 2023.

Auchincloss, the Massachusetts congressman, believes that such a coalition is possible. "You could build it on the Republican side with a sort of 'Cut out federal bureaucracy, bring things back to the states' argument," he told me. Lee, the UCLA researcher, feels similarly. "I think there is a potential alliance there. A people-not-wasting-money kind of coalition."

Case in point: In 2017 Scott Walker, then the firebrand Republican governor of Wisconsin, canceled the widening of I-94 in Milwaukee, a move supported by advocates on the left. "There are some groups out there that want to spend billions and billions and billions of dollars on more, bigger, wider interchanges across the state," Walker said at the time. "I actually think we should be fixing and maintaining our infrastructure." (Tony Evers, Walker's Democratic successor, has restarted the I-94 project.) Other prominent Republicans have sounded similar sentiments. At a conference in February, North Dakota Gov. Doug Burgum said he worried about the long-term costs of infrastructure if "we've

spent all our money on roads" and that the U.S. fails to "put the investment into building the infrastructure for multimodal transportation."

A critical moment will arrive in 2026, when Congress is expected to consider a five-year transportation plan that will allocate billions of dollars in funding and establish an array of novel policies. The new bill could look different from its predecessors, particularly because revenues collected from the gas tax are poised to plummet in an era of electric vehicles, leaving leaders on the hook for finding other ways to fund highways through measures like taxing miles driven. Auchincloss hopes they might decide to get out of the highway business altogether: "Instead of using Scotch tape and glue to fix it, let's just think differently from first principles." Environmental groups are already watching closely. "Those of us who care about climate change need to see the surface-transportation reauthorization as the next big climate bill," said Kate Zyla, the executive director of the Georgetown Climate Center.

Assuming Congress does keep funding highways, there are myriad avenues for the reauthorization bill to constrain expansion, starting with directing state DOTs to repair existing roadways before constructing new ones. "We should be saying, 'No, you can't build something new that you can't afford to maintain throughout its useful life,'" said Osborne, the head of Transportation for America. The U.S. Department of Transportation could also hold states accountable for the accuracy of their congestion-relief predictions for past highway projects, refusing to fund further expansions sought by state DOTs that habitually overpromise. Federal funding matches for new highways, currently 90 percent for interstates and 80 percent for federal-aid highways, could be reduced, with states invited to collect tolls, including congestion pricing similar to the program that was until recently set to launch in New York City.

Instead of a focus on congestion and car speed, federal dollars could be dispersed to maximize access, a quantitative measure of the ease with which people can reach their intended destinations. Maximizing access *can* mean building a road, when the circumstances truly call for it—but it can also mean building a railway, adding more buses, or creating a safe bike lane. "Right now we don't have accountability or metrics built off of connecting people to jobs and services," Auchincloss said.

Like the dam builders asked to preserve ecosystems 60 years ago, industry groups and highway engineers are unlikely to embrace redefinitions of success. "The tenets of induced travel are highly disturbing to the worldview of these big institutions that have been used to making decisions about billions of dollars," said Lee. "Having to change analytical processes is seen as really threatening to the entire institutional apparatus."

Still, Auchincloss is optimistic. “I think there’s a generational divide coming,” he told me. “It’s not going to be purely predicated on highways. It’s going to be a reconceptualization of transportation.” If so, there seems no shortage of work to be done, given the United States’ scant transit service, incomplete bike-lane networks, and nonexistent high-speed rail.

Thirty years ago, Beard confronted a comparable inflection point for dam building when President Bill Clinton appointed him to lead the Bureau of Reclamation. At the time, Beard was convinced that the agency’s raison d’être had to change. “I went around and met with all the bureau’s regional offices,” he said. “I walked into the room and said, ‘The dam-building era is over. Our job is to solve water problems, not to build monuments.’ ”

After a century of rampant roadbuilding, the U.S. highway network is ubiquitous, dominating the American landscape in bucolic rural settings as well as dense urban ones. Rather than being a tool for mobility, it has become a monument to an auto-centric lifestyle that fouls the air and depletes the public coffers. Neither the country nor the planet can afford to keep expanding it.

> Correction, Aug. 28, 2024: This article originally misidentified the Natural Resources Defense Council.

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How America Can Break Its Highway Addiction

In the 1980s, an unlikely alliance slowed the construction of nature-destroying dams. We just might be able to pull it off again.

BY DAVID ZIPPER

AUG 28, 2024 • 5:40 AM

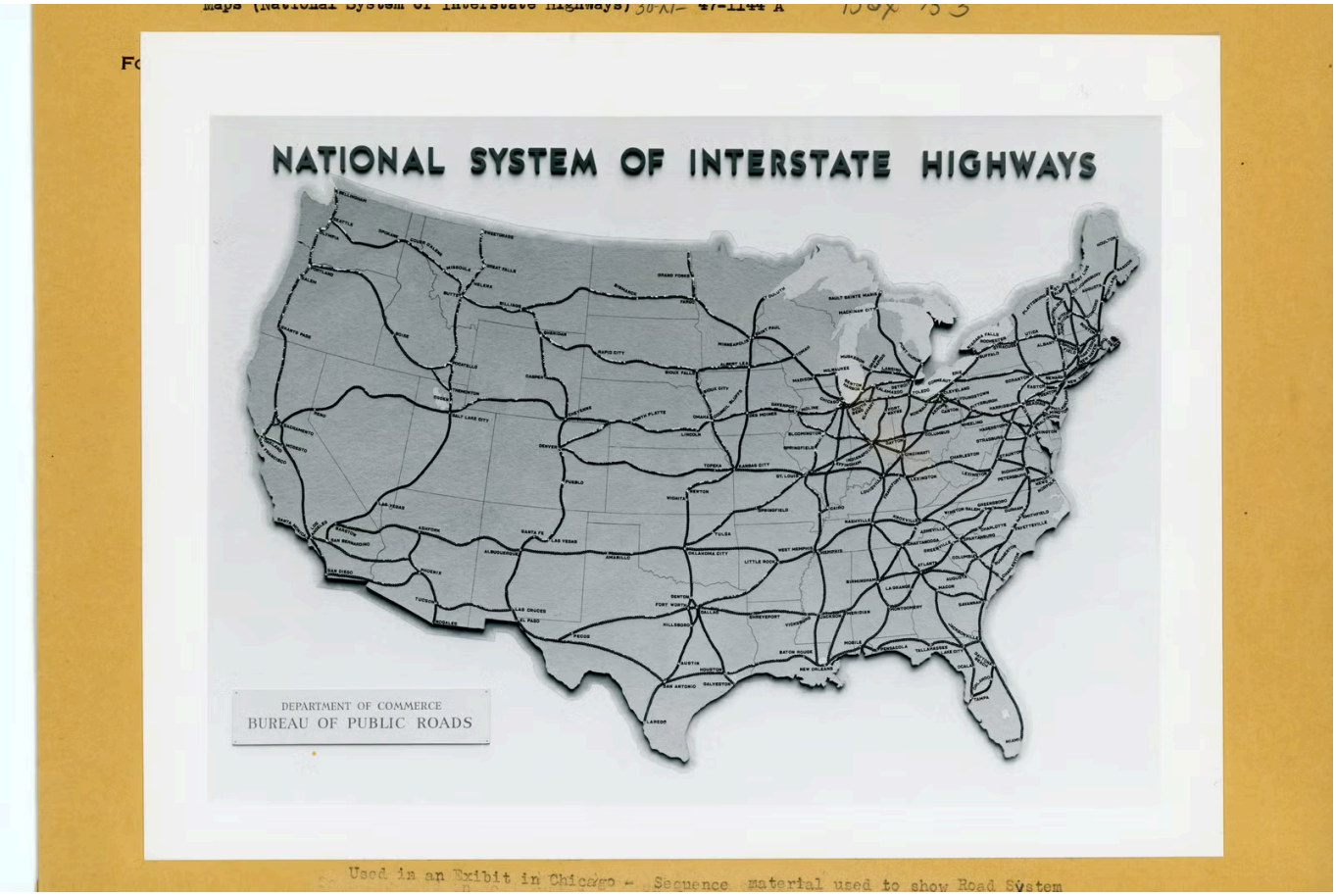
The neighborhood of Allendale, in Shreveport, Louisiana, lies just west of downtown. Long a nexus for northern Louisiana's Black community, Allendale's population is now just over 4,000, down from 12,000 in 1980. But there are newer developments in the area, such as the public housing complex that opened earlier this year, and a number of homes where families resettled after fleeing Hurricane Katrina in 2005. Allendale's gems include a park standing atop the site of a Civil War fort and a 19th-century waterworks, now a museum and a national historic landmark, that is the last steam-powered municipal water treatment plant in the United States.

All these structures could soon fall prey to a bulldozer. The reason: A proposed 3.5-mile highway, the I-49 Inner-City Connector, would smash through Allendale, wreaking havoc on everything in its path. "State officials call it 'the Connector,' " said Kim Mitchell, a Shreveport architect who has been fighting the project, "but it's really a divider—because it isolates Allendale."

Some of the Connector's boosters seem to see leveling Allendale itself as a reason to build the road. "The area that it covers is a lot of blighted area. It could be revitalized," Greg Tarver, a Louisiana state senator, told Bloomberg CityLab last year. The project's estimated budget: $865 million.

Those costs, both financial and human, are supposedly justified by the faster trip times that the Connector would offer. According to a 2016 study by the Northwest Louisiana Council of Governments, drivers who use the Connector would save an average of three minutes of travel time. (The study does not mention that Shreveport's traffic delays are already the lowest among Louisiana's four major metro areas, including New Orleans, Baton Rouge, and Lafayette.)

From San Bernardino to Austin to Cape Cod, state transportation departments are pouring billions of dollars into highway expansions that upend communities and damage the planet, all in a quixotic quest to conquer congestion. Entirely new highways are under discussion too, often with bipartisan backing, such as I-14, promoted by Sens. Ted Cruz of Texas and Raphael Warnock of Georgia, that would slice across the Gulf Coast from Midland, Texas, to Augusta, Georgia. In 2022 federal, state, and local governments spent $127.9 billion on highway construction, nearly twice the amount that went toward maintaining public roads—some 43 percent of which were rated in "poor" or "mediocre" condition, according to a 2021 report by the American Society of Civil Engineers.



Department of Commerce Bureau of Public Roads

The thing is, Americans already have access to 4.2 million miles of public roads, including an interstate system, completed in 1992, that can generally carry them anywhere they might like to go. It's unclear why, exactly, the country should prioritize further enlarging its highway network over repairing pavement that is in disrepair. The kicker is that, contrary to the promises of state transportation departments, new and expanded highways like the I-49 Connector consistently *fail* to reduce congestion. Instead of smoothing traffic flows, the added asphalt compels more people to drive until gridlock on the widened roadway is as thick as before. The supply of cars will, consistently, rise to meet—then clog up—the

available lanes. Solutions that can truly mitigate congestion, like improving transit service, implementing congestion pricing, and encouraging dense development, are often brushed aside as impractical. Instead, the U.S. is hooked on paving more and more highways, making old ones bigger, and adding new bits and bobs to the existing networks.

"We don't have a U.S. Department of Transportation," Democratic Massachusetts Rep. Jake Auchincloss told me. "We have a U.S. Department of Highways."

America's addiction to road construction goes back decades, enabled by naive policymaking, self-serving industry groups, and myopically trained highway engineers. Kicking that addiction is a Herculean task—but not an impossible one. We've been on a destruction course with excessive infrastructure before, and it nearly cost America the Grand Canyon. We corrected course then. The moment ahead of us is no less pivotal.

* * *

At first, the paths that connected cities were made of dirt, gravel, and sand. The Ford Model T's explosive success during the 1910s was partly due to its durability in terrible roadway conditions. In his book *Divided Highways*, Tom Lewis writes that the Model T offered "high axles and three-and-a-half-inch-wide tires, the better to traverse roads cut deep with ruts made by farm wagons." Still, it was apparent that smoother surfaces would enable faster travel in these newly popular machines.

Sensing an opportunity to turbocharge the U.S. economy, the federal government began to fund roadway construction directly. The Bureau of Public Roads, formed in 1915, spent $750 million on roads in the 1920s. In 1924, Lewis recounted, the bureau's leader Thomas MacDonald shared his vision for the future: "My aim is this. We will be able to drive out of any county seat in the United States at 35 miles an hour and drive into any other county seat—and never crack a spring."

MacDonald and his team were backed by a powerful corporate alliance that included the auto, asphalt, concrete, and rubber industries. With their support, states and the federal government established gasoline taxes, whose revenues would be used solely for roads, providing an ongoing and secure funding source for future construction.

Creatively designed roadways captured the public's imagination, such as the first cloverleaf interchange, erected in Woodbridge Township, New Jersey, in 1928, which allowed drivers to move between two highways without crossings or left turns. At the 1939 World's Fair in New York, Norman Bel Geddes' utopian vision of a nation crisscrossed by immaculate,

congestion-free roads drew massive crowds to the General Motors booth. Upon exiting, 5 million visitors were given a pin that declared: "I Have Seen the Future."

American highway construction went into overdrive after World War II, as an expanding middle class moved into car-centric suburbs. In 1956 the Federal Highway Act launched the interstate system, a civic commitment to provide rapid, smooth travel between major cities nationwide.

Clover Leaf Intersection Routes 4 and 25 near Woodbridge Township, New Jersey. Bettmann/Getty Images

But that still left open the question of car trips *within* urban areas, which occurred largely on roadways with stoplights and intersections that constrained traffic speeds. Although President Dwight Eisenhower made clear in a 1960 White House meeting that he did not intend for new interstates to bulldoze their way through urban neighborhoods, an alliance of highway engineers, chambers of commerce, and city officials effectively overrode him, designing routes that leveled low-income and minority neighborhoods while leaving affluent and white communities intact. That was no accident; local leaders saw the new interstate system as a golden opportunity to expunge "blight," which they claimed acted as a barrier to development.

In Miami, for example, Overtown was the traditional heart of the city's Black community, with jazz clubs hosting the likes of Ella Fitzgerald, Josephine Baker, and Nat King Cole. Highway engineers targeted Overtown as the site of a massive interchange connecting I-95, I-395, and State Road 836, displacing half of Overtown's population by 1965. For decades, Overtown residents mourned what they had lost. "I get choked up every time I talk about it, just like my dad used to get choked up," Naomi Rolle told WLRN, the South Florida PBS affiliate, in 2013. "In 1965 they ran him out of that house."

Interstate 95 in January 2022 in Miami. Joe Raedle/Getty Images

Those who pushed back against urban highway projects were reminded that, as Robert Moses, the master builder of roads like New York's Cross Bronx and Long Island expressways, liked to say, "you can't make an omelet without breaking some eggs." The "omelet" in this case was faster car trips. Lewis writes that John Volpe, a federal official charged with overseeing the nascent interstate system, instructed his engineers to "concentrate on the urban sections of the system, since cities had the greatest traffic congestion."

But there was a problem: New urban highways had a pesky habit of filling up with traffic almost as soon as they opened. A classic example was the Van Wyck Expressway, which Moses built in Queens in 1950. As recounted in Robert Caro's book *The Power Broker*, Moses promised that "traffic would flow freely" following the expressway's construction. Instead, residents found that "the new road had not freed them from the trap of daily travel," Caro writes. "It had closed the trap on them more firmly than ever, for new traffic, generated by the new road, was also jamming the local streets."

The phenomenon Caro described is now known as induced demand. On new highways like the Van Wyck, the added road space can at peak times persuade people to drive who might

otherwise have left earlier or later in the day, or taken transit, or perhaps not traveled at all. The result is an endless cycle in which congestion leads to highway expansion, which invites more peak-hour trips, which brings back traffic, and so on. The pattern is so inevitable that economists have dubbed induced demand the "iron law of congestion." According to a recent report by Transportation for America, an advocacy group, the 100 largest urbanized areas expanded their total lane miles 42 percent between 1993 and 2017 (equivalent to more than 30,000 miles of lanes), exceeding their collective 32 percent population growth during that time. Despite all that road construction, total delays in those regions skyrocketed 144 percent.

Today few urban highways are proposed as a solution for blight (Tarver, the Louisiana state senator and backer of the I-49 Connector, being an exception). But many are, despite all the evidence, promised as a congestion cure. Maryland's transportation department, for instance, describes its proposed widening of I-270 northwest of Washington as a "traffic relief plan." Marylanders should be skeptical of such framing. A more common experience from highway widening can be found in Houston, where the $2.8 billion that the Texas Department of Transportation spent in 2011 to broaden the Katy Freeway to as many as 26 lanes resulted in traffic being worse than ever. TxDOT now wants to spend $740 billion—more than the gross domestic product of Belgium—on transportation in the next 25 years, with "congestion relief" one of its key goals. Some $160 billion would be spent solely on doubling the size of existing two-lane roads.

Katy Freeway in Houston in 2013. Smiley N. Pool/Houston Chronicle/Getty Images

Because of induced demand, this Sisyphean struggle against congestion is an expensive boondoggle. Worse, the added miles of highway lanes act as an accelerant for climate change. Beyond transporting more cars—99 percent of which in the U.S. run on gasoline alone—bigger highways nudge people to move to more spacious homes on the urban periphery, where cars are often the only means of reliable transport. The result is an increase in total driving, with greenhouse gas emissions rising in lockstep, along with other forms of pollution, like tire particulates, which can kill fish when they leach into fresh water.

This tight link between highway construction and car pollution has led environmental groups to push back against roadway-widening projects. "Highway expansions that cram even more cars onto congested roads are undermining our climate goals," declared the Natural Resources Defense Council in a post earlier this year.* Car drivers, meanwhile, are left just as exasperated by gridlock as they were before.

As destructive and pointless as highway construction can be, it continues to appeal to broad swaths of the public—and to elected leaders. "Expanding highways doesn't reduce congestion, but it sounds like it should," said Beth Osborne, the director of Transportation for America. "And by the time it fails, that politician won't be there anyway."

Part of the problem is that many highway engineers are obsessed with congestion but reject induced demand, which leads them to focus on roadway expansion—not denser development or expanded transit service—in a doomed effort to keep traffic flowing. After all, laying pavement is what highway engineers and their computer models are trained to do. "Engineers rely on [congestion-projection estimates] whenever they want to sell us a bigger and supposedly better road," wrote University of Colorado Denver urban planning professor and engineer Wes Marshall in his book *Killed by a Traffic Engineer*.

As powerful as America's highway addiction is, the current predicament is not hopeless. In fact, just a few decades ago, the United States managed to break a comparably catastrophic infrastructure habit: dam construction.

* * *

A hundred years ago, dams, like highways, offered tantalizing benefits to a burgeoning nation. With electricity demand soaring, dams could produce vast

quantities of cheap power by harnessing the water flowing through them to turn a turbine: The Grand Coulee Dam, built during the Great Depression atop the Columbia River, generates 21 billion kilowatt-hours of electricity a year, enough to power 2 million homes. By blocking the natural flow of rivers and streams, dams created reservoirs to provide a reliable source of water for irrigation; in the arid Southwest, they could practically conjure breadbaskets out of desert. Where dams were, people could live, work, and produce. The colossal Hoover Dam, along the Nevada–Arizona border, transformed 1.5 million acres of scrub into farmland—and tamed the flood-prone Colorado River too.

Dams can be built in any number of ways, but they fundamentally involve blocking the free flow of a river with a structure that forces water to pool behind it, creating an artificial lake that can be used for agriculture or human consumption (and sometimes for recreation as well). More than 10,000 dams were erected in the U.S. from 1920 to 1949 by the Bureau of Reclamation and the Army Corps of Engineers, which collaborated with industry partners in sectors like construction, engineering, and concrete. Many of those dams provided massive quantities of jobs; some 21,000 people helped build Hoover Dam alone.

As Marc Reisner describes in *Cadillac Desert: The American West and Its Disappearing Water*, dam proponents like Franklin Lane, Woodrow Wilson's interior secretary, spoke with religious fervor: "The mountains are our enemies. We must pierce them and make them serve. The sinful rivers we must curb." Everybody west of the Mississippi seemed to want a dam nearby, from farmers searching for cheap water to speculators anticipating a spike in land values to politicians eager for ribbon cuttings. "If there was a stretch of free-flowing river anywhere in the country, our reflex action was to erect a dam in its path," Reisner writes.

But there was a problem: No amount of dam building seemed capable of quenching the West's thirst for water.

"When you added a couple of lanes to a freeway or built a new bridge, cars came out of nowhere to fill them," Reisner writes. "It was the same with water: the more you developed, the more growth occurred, and the faster demand grew." To encourage more development in the Southwest, the Bureau of Reclamation once proposed piping water from the Pacific Northwest to the Mexican border, a distance of 1,000 miles.

View of O'Shaughnessy Dam and Hetch Hetchy Reservoir, in California. Keystone View Company/Library of Congress

In their race to build, dam engineers worried little about the calamitous impact their creations were having on local ecosystems. John Muir, the famed naturalist and founder of the Sierra Club, railed against the O'Shaughnessy Dam, which in 1923 flooded the bucolic Hetch Hetchy Valley. A "natural paradise," according to the San Francisco Chronicle, Hetch Hetchy was thought to be as beautiful as Yosemite, only a few miles away. Muir was devastated by its destruction, lamenting, "Dam the Hetch Hetchy! As well dam for water tanks the people's cathedrals and churches, for no holier temple has been consecrated by the heart of man."

The ecological toll of dam building was immense. Neither overfishing nor pollution, writes David Wilcove in his book *The Condor's Shadow*, "has endangered as many species of fish, mussels, amphibians, and crayfish as has habitat destruction." Birds were at risk too, since dams often destroyed the wetlands where they would feed and breed.

When engineers did try to mitigate the damage to wildlife, their efforts could be almost comically hapless. Wilcove describes fish ladders installed on dams in the Columbia River that allowed adult salmon to travel upstream but offered no accommodation for juveniles

heading in the opposite direction, leading local populations to collapse. That basic design flaw was repeated eight times over a period of 40 years.

The consequences of depleting salmon populations can be felt way up the food chain. Ben Goldfarb, a nature journalist who is currently writing a book about fish, noted that dams still affect the orcas that inhabit the Salish Sea off Washington state and British Columbia. "The orcas are basically failing," he told me. "They're not reproducing, and their population is declining. The biggest factor affecting these orcas is starvation because of the decline of Chinook salmon—which is because of the dams upriver."

Nonetheless, Congress kept the money flowing for dam development. "The whole business was like a pyramid scheme—the many (the taxpayers) were paying to enrich the few—but most members of Congress figured that if they voted for everyone else's dams, someday *they* would get one too," Reisner writes. "Water projects came to epitomize the pork barrel; they were the oil can that lubricated the nation's legislative machinery." To keep legislators on their side, federal officials would imply that a project in their district would break ground soon, as long as Congress continued approving appropriations.

By the latter half of the 20th century, most of the best sites for dams—the places where hydropower or irrigation could produce a solid return on investment—already had one. "By then, you've basically built all the dams that you can easily," said Donald Jackson, a professor at Lafayette College who studies the history of engineering. "There isn't more water you can profitably store, and then people realize there aren't that many free-flowing rivers."

That did not stop Big Dam. Over 11,000 dams were built in the 1950s—more than during the previous three decades combined.

Pushback, though, was brewing. After World War II, the Bureau of Reclamation proposed building the Echo Park Dam on Utah's Green River. The project would entail flooding most of Dinosaur National Monument, a park that now covers 210,000 acres and offers river rafting, cross-country hiking, and a chance to view ancient petroglyphs as well as 1,500 dinosaur fossils embedded in rock. Outrage followed. "Shall We Let Them Ruin Our National Parks?" asked a 1950 article in the Saturday Evening Post. Facing mounting opposition, much of it stoked by a fiery new leader of the Sierra Club named David Brower, the bureau dropped those plans and instead built the Glen Canyon Dam, which created Lake Powell.

The fight between environmentalists and dam builders escalated in the 1960s, after the bureau proposed damming the Colorado River next to another U.S. treasure: Grand Canyon

National Park. Brower's Sierra Club fought those plans with everything it had, placing a full-page ad in the New York Times in 1968 that read, "If They Turn Grand Canyon Into a Cash Register Is Any National Park Safe?" Grand Canyon was spared. "The Bureau of Reclamation engineers are like beavers," Brower told John McPhee in *Encounters With the Archdruid*. "They can't stand the sound of running water."

Brower's efforts to curb the beaverlike engineers steadily gained allies in Washington, as the federal government started to assert itself in the battle over water projects. The 1968 Wild and Scenic Rivers Act protected waterways like the Missouri, Snake, and Delaware rivers from exploitation, and the 1970 National Environmental Policy Act created new approvals that slowed dam construction and made it more expensive. "It simply got to the point where it cost too much to build new dams," said Dan Beard, who oversaw the Bureau of Reclamation as a Department of the Interior official in the 1970s.

Still, Big Dam remained a potent force on Capitol Hill. As Reisner details in *Cadillac Desert*, in the late 1970s, President Jimmy Carter tried to kill 18 dam projects that seemed especially ill-conceived. Beard, who worked on Carter's presidential transition team, said that this "hit list" of dams slotted for cancellation sparked a firestorm in Washington when the press got hold of it. "These were dogs—I mean, just terrible projects," Beard said. "But you've got these titans of the Senate, people like John Stennis, absolutely going crazy." Although controlled by fellow Democrats, Congress brushed Carter aside and funded most of the dam projects anyway.

But there is a force that can trump even the most determined troop of engineers and their backers—and that's money problems. A soaring national debt prompted Republicans like President Ronald Reagan to seek budget cuts, laying the groundwork for an unlikely collaboration between fiscal conservatives and environmentalists that finally brought Big Dam to heel.

"It was pretty strategic," said Beard, who worked on water and environmental issues for Democratic congressman George Miller in the 1980s after leaving the Carter administration. "The environmentalists said, 'We have a core base of support, but we're not the majority. Who are the logical people to add to the coalition?' It's these guys wandering around, saying we've got to balance the federal budget."

The fiscal prudence argument proved to be a welcome complement to environmentalists' ecological concerns. "When groups like the National Taxpayers Union came on and said, 'This is a waste of federal money,' that gave a really tangible argument for people to grab hold of," Beard told me.

What Reisner called a “discrete alliance” of environmentalists and fiscal hawks backed the 1986 Water Resources Development Act, which forced local governments to fund a chunk of future dam projects themselves. Beard said that bill never would have become law without support from Republicans like Tom Petri, a Wisconsin representative at the time. “He was this sort of noble warrior about dams, saying, ‘This is wrong! This is wrong!’ ” Beard said, chuckling. “We were like, ‘Yeah, well, we all know it’s wrong.’ ”

Department of Commerce Bureau of Public Roads

With the adoption of dam cost sharing in the 1980s, Reisner writes, “the pork barrel seemed finally to have lost its anchorings.”

A little more than 200 dams were erected annually between 2000 and 2021—the lowest figure since the 1920s—and most were a shadow of earlier behemoths. “I can’t think of a major facility built in the last 40 years that’s of the nature we built before,” Beard said.

In many places, the current trend is toward dam removal. In 2023 some 80 dams were dismantled, seeding hopes of an ecological comeback in watersheds like the Klamath River, in Oregon and California. In total, over 300 dams have now been removed from the Pacific Coast states.

For the moment, Big Highway feels every bit as powerful—in red states as well as blue—as Big Dam was in its heyday. But two generations ago, we broke our addiction to dams. The same could happen with our ever-widening highways.

* * *

Even in deep-blue states, a bipartisan coalition keeps the highway funding spigot open, said Amy Lee, a postdoc at the University of California, Los Angeles who wrote her dissertation about California's failure to constrain highway growth. "The construction-materials companies tend to be very big on the right, and organized labor tends to be very powerful on the left," she said, and these forces form a pro-highway juggernaut. In January, a coalition of construction companies and labor groups sent a letter to California's top elected leaders defending "funding for infrastructure projects that may potentially increase vehicle miles traveled"—i.e., highway expansions. (The Laborers' International Union of North America did not respond to repeated requests for comment for this article.) As with electric vehicles, highway construction seems to be a topic in which environmental and union interests diverge.

Transportation departments don't want to hear *no* on highways. In 2022 Oklahoma's department of transportation preemptively bought 23 web domains, like oklahomansagainstturnpikes.com and stoptheeasternloop.com, that could theoretically be used to rally opposition to the state's $5 billion highway plan. Speaking up against pavement within a department can be difficult and risky. Last year, Jeanie Ward-Waller, a Massachusetts Institute of Technology–trained engineer who served as the deputy director of planning and modal programs for California's Caltrans, was demoted after questioning her agency's plans to widen I-80 between Sacramento and Davis. In an editorial published in the San Francisco Chronicle, Ward-Waller wrote, "My concerns were repeatedly brushed off by my bosses, who seemed more concerned about getting the next widening project underway than following the law."

At the federal level, even asking questions about the collective climate impact of highway building appears verboten. In 2022 Stephanie Pollack, the acting head of the Federal Highway Administration, called on state DOTs to measure the carbon emissions attributable to their highway systems. Republicans were incensed; 21 states filed a suit, and Republican Senate Minority Leader Mitch McConnell advised governors to simply ignore her.

Democrats have supported highway expansions too. The White House called the Bipartisan Infrastructure Law "a critical step towards reaching President Biden's goal of a net-zero

emissions economy by 2050," but subsequent analysis by Transportation for America found that state DOTs used nearly a quarter of the $270 billion they received through the law to expand highways, a move sure to increase emissions. (After the infrastructure bill was passed, the head of Louisiana's transportation department said that "some of the winners I think from this project funding will be things like the Inter-City Connector," referring to the Shreveport project.)

With so many forces pushing for roadway expansions, opposing them requires political bravery. Decades ago, the costs of opposing dam construction were also steep: After the Sierra Club took out the ad that helped save the Grand Canyon, the organization's tax-exempt status was revoked for lobbying. Brower was subsequently forced out, but he harbored few if any regrets. And in the long run, he won.

Look closely at the fight now playing out against highways, and there are signs of progress. For years, the environmental movement, which played such a pivotal role corralling American dam building, was focused more on improving automobile fuel economy and promoting electric vehicles than reducing the total amount of driving. In recent years, however, a number of groups have become vociferous critics of highway construction. In February, a coalition of 199 nonprofits, including national heavyweights like the Sierra Club as well as local groups such as Sustainable Claremont, called on elected leaders to "adopt a moratorium on expanding highways and a pause on existing projects until climate, equity, and maintenance goals are met." In Colorado, lobbying from environmental groups pushed state officials to link transportation funding—including money for highways—to reductions in greenhouse gas emissions. A few months ago, environmental groups including the Natural Resources Defense Council filed a lawsuit to block California's DOT from expanding I-80 near Sacramento (the project that allegedly cost Ward-Waller her job).

I-70 near Glenwood Springs and the Colorado River—the final stretch of the Interstate Highway System. Joe Sohm/Visions of America/Universal Images Group/Getty Images

What has been missing is an alliance between environmentalists and fiscal conservatives like the one that restrained Big Dam in the 1980s. Although some MAGAfied Republicans may worry little about squandering public money on futile projects, those committed to smaller government could be willing to listen—particularly as highway construction costs have surged 63 percent from 2019 to 2023.

Auchincloss, the Massachusetts congressman, believes that such a coalition is possible. "You could build it on the Republican side with a sort of 'Cut out federal bureaucracy, bring things back to the states' argument," he told me. Lee, the UCLA researcher, feels similarly. "I think there is a potential alliance there. A people-not-wasting-money kind of coalition."

Case in point: In 2017 Scott Walker, then the firebrand Republican governor of Wisconsin, canceled the widening of I-94 in Milwaukee, a move supported by advocates on the left. "There are some groups out there that want to spend billions and billions and billions of dollars on more, bigger, wider interchanges across the state," Walker said at the time. "I actually think we should be fixing and maintaining our infrastructure." (Tony Evers, Walker's Democratic successor, has restarted the I-94 project.) Other prominent Republicans have sounded similar sentiments. At a conference in February, North Dakota Gov. Doug Burgum said he worried about the long-term costs of infrastructure if "we've

spent all our money on roads" and that the U.S. fails to "put the investment into building the infrastructure for multimodal transportation."

A critical moment will arrive in 2026, when Congress is expected to consider a five-year transportation plan that will allocate billions of dollars in funding and establish an array of novel policies. The new bill could look different from its predecessors, particularly because revenues collected from the gas tax are poised to plummet in an era of electric vehicles, leaving leaders on the hook for finding other ways to fund highways through measures like taxing miles driven. Auchincloss hopes they might decide to get out of the highway business altogether: "Instead of using Scotch tape and glue to fix it, let's just think differently from first principles." Environmental groups are already watching closely. "Those of us who care about climate change need to see the surface-transportation reauthorization as the next big climate bill," said Kate Zyla, the executive director of the Georgetown Climate Center.

Assuming Congress does keep funding highways, there are myriad avenues for the reauthorization bill to constrain expansion, starting with directing state DOTs to repair existing roadways before constructing new ones. "We should be saying, 'No, you can't build something new that you can't afford to maintain throughout its useful life,'" said Osborne, the head of Transportation for America. The U.S. Department of Transportation could also hold states accountable for the accuracy of their congestion-relief predictions for past highway projects, refusing to fund further expansions sought by state DOTs that habitually overpromise. Federal funding matches for new highways, currently 90 percent for interstates and 80 percent for federal-aid highways, could be reduced, with states invited to collect tolls, including congestion pricing similar to the program that was until recently set to launch in New York City.

Instead of a focus on congestion and car speed, federal dollars could be dispersed to maximize access, a quantitative measure of the ease with which people can reach their intended destinations. Maximizing access *can* mean building a road, when the circumstances truly call for it—but it can also mean building a railway, adding more buses, or creating a safe bike lane. "Right now we don't have accountability or metrics built off of connecting people to jobs and services," Auchincloss said.

Like the dam builders asked to preserve ecosystems 60 years ago, industry groups and highway engineers are unlikely to embrace redefinitions of success. "The tenets of induced travel are highly disturbing to the worldview of these big institutions that have been used to making decisions about billions of dollars," said Lee. "Having to change analytical processes is seen as really threatening to the entire institutional apparatus."

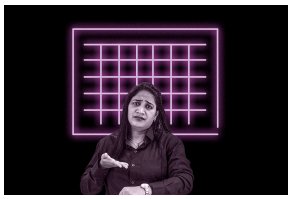
Still, Auchincloss is optimistic. “I think there’s a generational divide coming,” he told me. “It’s not going to be purely predicated on highways. It’s going to be a reconceptualization of transportation.” If so, there seems no shortage of work to be done, given the United States’ scant transit service, incomplete bike-lane networks, and nonexistent high-speed rail.

Thirty years ago, Beard confronted a comparable inflection point for dam building when President Bill Clinton appointed him to lead the Bureau of Reclamation. At the time, Beard was convinced that the agency’s raison d’être had to change. “I went around and met with all the bureau’s regional offices,” he said. “I walked into the room and said, ‘The dam-building era is over. Our job is to solve water problems, not to build monuments.’ ”

After a century of rampant roadbuilding, the U.S. highway network is ubiquitous, dominating the American landscape in bucolic rural settings as well as dense urban ones. Rather than being a tool for mobility, it has become a monument to an auto-centric lifestyle that fouls the air and depletes the public coffers. Neither the country nor the planet can afford to keep expanding it.

> Correction, Aug. 28, 2024: This article originally misidentified the Natural Resources Defense Council.

Pete Hegseth and Tulsi Gabbard Are Bananas Cabinet Picks. But Don't Overlook Trump's Horrifying Choice for the CIA.



I Finally Slept With Someone New After My Breakup. Uh, Is This What Men Are Like Now?

One of Fiction's Most Popular Detectives Finally Has His Own TV Show. It Nails His Appeal.

The Wrong People Are in Charge of American Streets

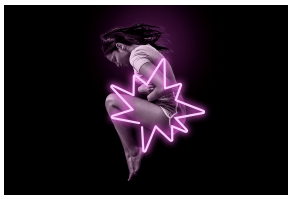
Trump Might Miss the Department of Education When It's Gone

My Wife Transforms Into a Totally Different Person After She Orgasms. It Can Last for Weeks.

My Sister-in-Law's Food "Sensitivities" Have Gotten Out of Hand

I Pushed for a Messed Up Custody Arrangement During My Divorce. Well, the Kids Just Found Out and They'll Never Forgive Me.

I'm Worried This Year's Thanksgiving Trip Poses a Threat to My Life



I’m Having the Best Sex of My Life. But There’s a Limit I Shouldn’t Cross.

Vladimir Putin Is Already Manipulating Trump

IBR Draft SEIS - RECORD #2471 DETAIL

First Name :	Mikasi
Last Name :	Goodwin
Attachments :	DSEIS2471_Goodwin_Original.pdf (4 kb)

IBR Draft SEIS - RECORD #2471 DETAIL

Submission Date : 11/15/2024
First Name : Mikasi
Last Name : Goodwin
Business/Organization/Agency :

Submission Input :

First Name:
Mikasi
Last Name:
Goodwin
Email:
[redacted]
City:
[redacted]
US States:
[redacted]
Zip:
[redacted]
Topic Area:
Acquisitions and Displacement
Comment:
It is ridiculous that in 2024 there is even consideration of displacing residences or businesses to build highway infrastructure. Have we learned nothing in the past half a century? I am begging you to have any kind of historical analysis or vision for the future. We can not do business as usual, this project must be done without displacement and with public transit, bicyclists and pedestrians in prioritized above automobiles.
JCA comment #: 443

IBR Draft SEIS - RECORD #2472 DETAIL

First Name :	LAURA
Last Name :	MILLER
Attachments :	DSEIS-2472_Miller_Original.pdf (367 kb) MLK_Undercrossing_Laura Miller.pdf (366 kb)

IBR Draft SEIS - RECORD #2472 DETAIL

Submission Date :	11/15/2024
First Name :	LAURA
Last Name :	MILLER
Business/Organization/Agency :	
Attachments :	MLK_Undercrossing_Laura Miller.pdf (366 kb)

Submission Input :

So many things to consider. Almost an over-whelming project. We moved here almost twelve years ago. All the research, planning, etc., for a new bridge was scraped. Such a waste of money.

The US Coast Guard should be priority one, along with PDX airport. If you cannot get these folks around a table to come to an agreement, you might as well go home.

I live in the Bridgeton neighborhood. Lucky me, right? Our neighborhood association was diligent enough to take the time to think out all the concerns for us. I submit to you in separate emails every document that covers the suggestion and concerns.

* Looks matter. Do not build an ugly bridge.
* Bikes and freight are not friends.
* 40-Mile loop must be well thought out; the pride of our bike riding state.
* Build a bridge that considers multiuse paths
* MLK on ramp must be better, way better than what we have now.

Thank you,

Laura Miller

[redacted]

[redacted]

[redacted]

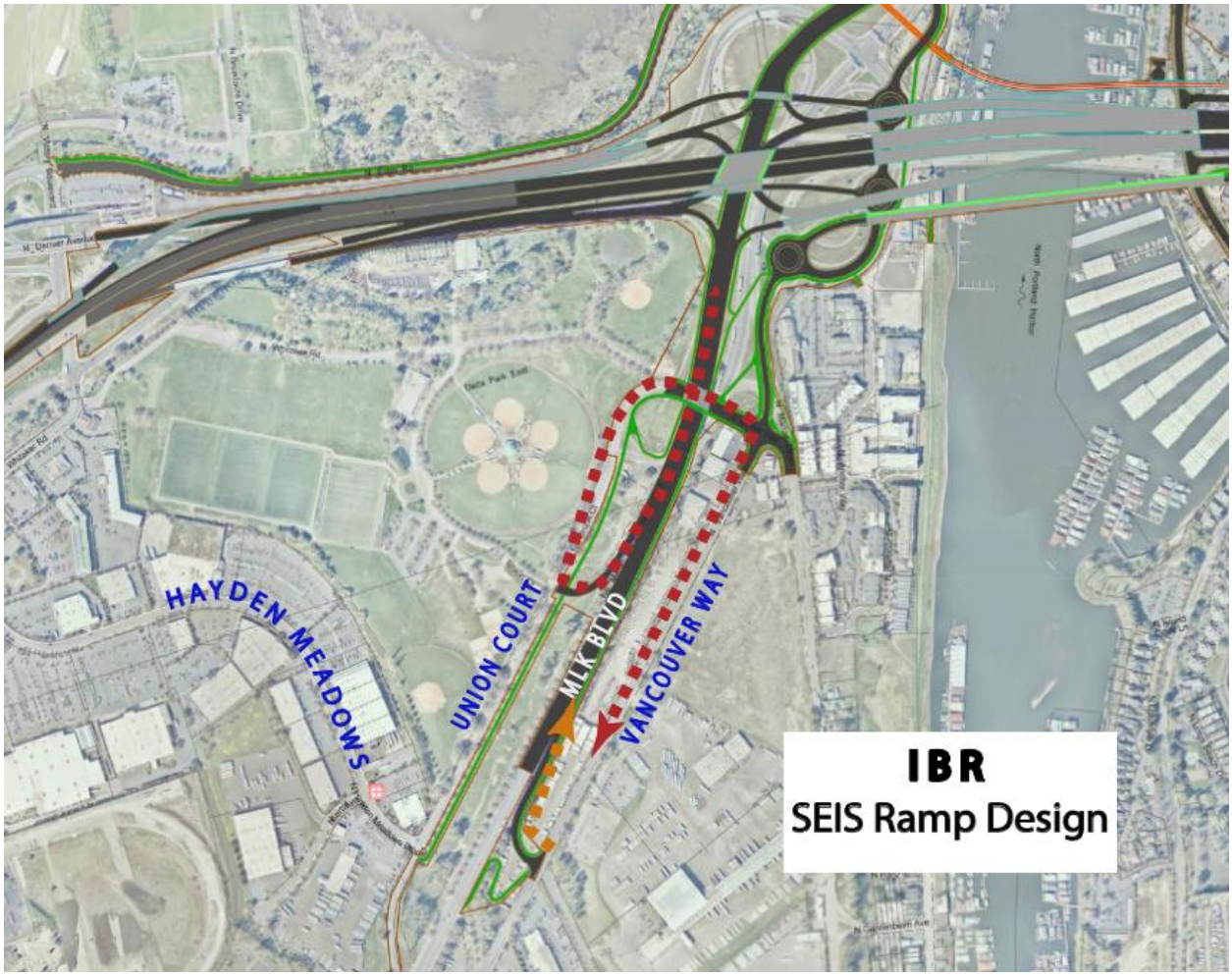
The MLK Undercrossing and Complete Interchange
Better Freight & Neighborhood Access Ramps for the IBR

Initial Proposed Design for MLK Access Ramps.

The Interstate Bridge Replacement (IBR) proposes a Martin Luther King (MLK) on-ramp and off-ramp design that meets very minimal requirements:

1) These ramps replace the existing ramp connections.
2) These ramps merge vehicles onto MLK further away from the Marine Drive single point intersection improving the merge/weave problems with the current intersection.

But this minimal ramp design does not excel with other important goals for Portland including efficient regional freight movement, recreational park safety and understandable way finding.



Problems with the proposed MLK ramp design

1) The proposed ramp design creates out of direction travel.
2) The proposed design is confusing to navigate. A traveler will take the off-ramp to leave the Marine Drive / MLK interchange, but not clearly see how to get back onto the Marine Drive / MLK interchange. There is the same way finding confusion in reverse

3) The proposed MLK off-ramp conflicts with Delta Park's primary recreational entrance. Since this a major Freight travel ramp, this ramp should not conflict with the major access to a major recreational area.
4) The proposed MLK ramp encourages Freight movement to use East Marine Drive for access when the Freight Master plan wants freight travel to use Columbia Blvd to MLK for Freight Access rather than East Marine Drive which is a local neighborhood roadway.

Proposal - MLK Undercrossing and Complete Intersection

There is a better design to meet all of IBR requirements while also meeting broader Portland Freight, Neighborhood and Parks planning goals.

This new ramp design proposes an undercrossing under MLK connecting Hayden Meadows Drive to Vancouver Way. This new MLK undercrossing combined with slightly relocated MLK on-ramps and off-ramps has the following advantages:

1) The Complete MLK Intersection minimizes out of direction travel.
2) The complete MLK intersection removes Freight users from the main Delta Park Entrance.
3) This design would be easier to navigate. It is more understandable for Freight and other users just how to get on and off MLK and the access the Marine Drive Interchange.

4) The new undercrossing meets the purpose and need of the IBR : (a) improve travel safety and traffic operations on the I-5 river crossing **and associated interchanges**; (c) **improve highway freight mobility** and address interstate travel and commerce needs in the Program. The MLK Undercrossing designs meets the purpose and needs better than the minimal IBR ramp design.
5) Lastly the MLK undercrossing provides a new way to access the Hayden Meadows Drive commercial shopping area. This new access could help off-set the removal of the direct access to Hayden Meadows that exist today from the current Marine Drive intersection to I-5 South to Interstate Ave off ramp. This existing off ramp connection from Marine Drive south bound on-ramp to Interstate Ave was removed to provide for the new Braided Ramp from Marine Drive to I-5. This Interstate Ave ramp connection from I-5 still exits if someone is on the main line of I-5. However Marine Drive travelers on the local Portland system wanting to access Interstate Ave in the IBR proposed design would have to travel through the three new Marine Drive traffic circles, then to Expo Road then connect to Interstate Ave. The MLK undercrossing design would create another more direct way to get to Hayden Meadows Drive and Interstate Ave.

IBR's Response to building the MLK Undercrossing

Have Portland Fund This – Not the IBR
This undercrossing has been proposed to the IBR early in the design process. IBR has stated that a MLK undercrossing might be nice to have but that the undercrossing should be something that City of Portland funds later.

A complete MLK Undercrossing and ramp design is more appropriate to be included in the IBR funding package. This undercrossing improves Freight connections for this intersection described as Oregon's Most Important Freight Interchange. The MLK Undercrossing excels at meeting the IBR purpose and need (c) **improve highway freight mobility**.

Rather than the IBR build a minimally acceptable ramp design and suggest the local city come back later and rebuild the preferred connection is not good public policy. The cost of the undercrossing would be an exceptionally large funding request for Portland. The Undercrossing is more appropriate to be funded in the budget for a project that describes itself as building a bridge to meet the needs for the next 100 years.

Please study the MLK undercrossing and full interchange design.
Involve the Freight Community, the local residents, Portland Transportation and Portland Parks.
Let's work together to refine a ramp and undercrossing design that excels at meeting section C of the purpose and need of the IBR to improve freight mobility.

Thank you!

Laura Miller
[redacted]

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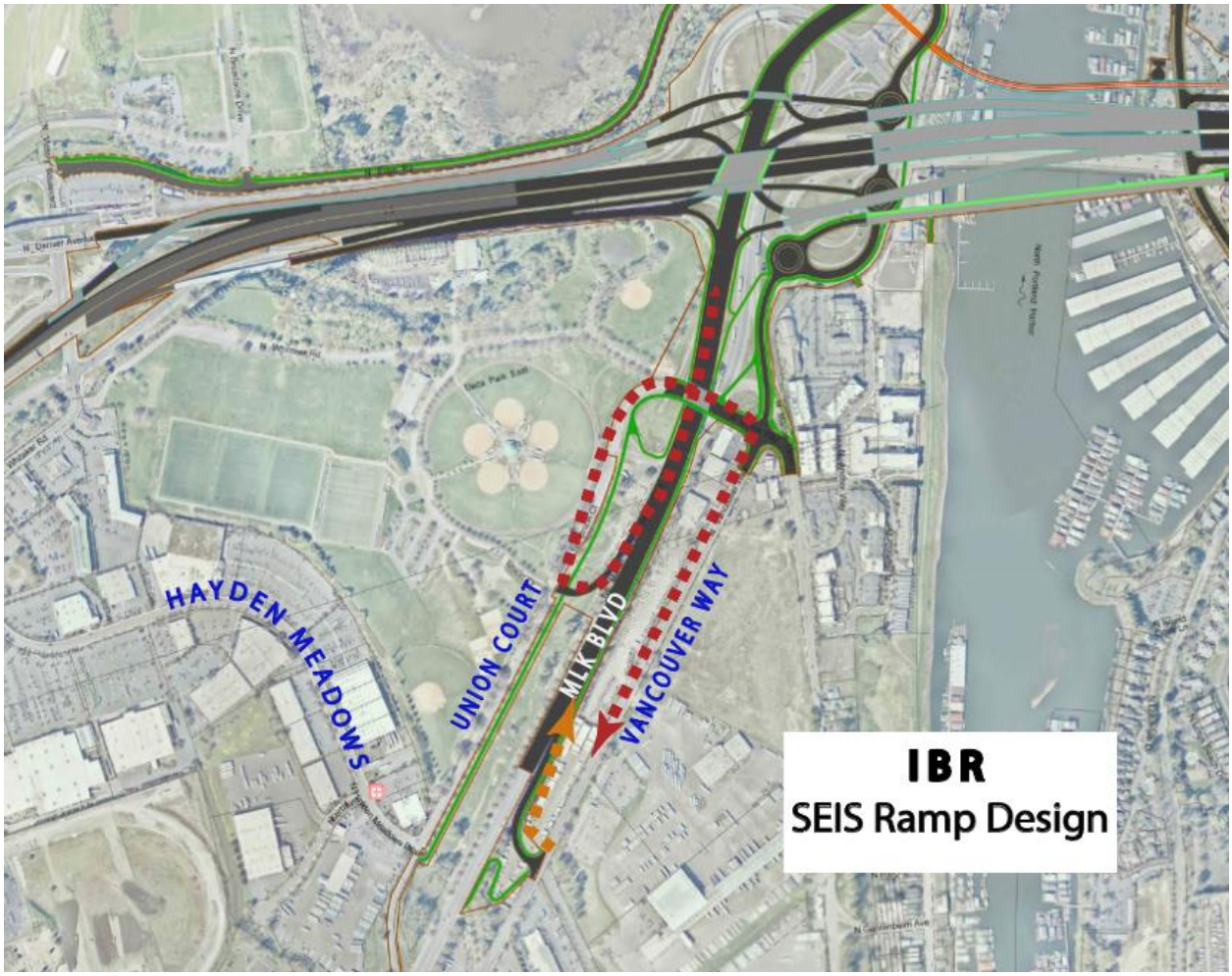

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Involve the Freight Community, the local residents, Portland Transportation and Portland Parks.
Let's work together to refine a ramp and undercrossing design that excels at meeting section C of the purpose and need of the IBR to improve freight mobility.

Thank you!

Laura Miller
424 N. Bridgeton Road
Portland, OR 97217

IBR Draft SEIS - RECORD #2474 DETAIL

First Name :	Robert
Last Name :	Wallis
Attachments :	DSEIS2474_Wallis_Original.pdf (380 kb)

IBR Draft SEIS - RECORD #2474 DETAIL

Submission Date :	11/15/2024
First Name :	Robert
Last Name :	Wallis
Business/Organization/Agency :	
Attachments :	2024-Eng-Report-Assessing-Tunnel-Option-Robert-Wallis.pdf (491 kb)

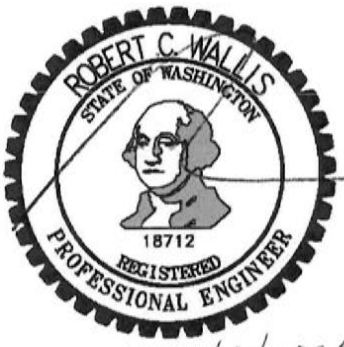
Submission Input :

First Name:
Robert
Last Name:
Wallis
Email:
[redacted]
Phone:
[redacted]
City:
[redacted]
US States:
[redacted]
Zip:
[redacted]
Topic Area:
Transportation
Comment:
Please see the attached Engineering Report and accept as a comment on the SEIS and its deficiencies. It was clearly deficient in evaluating the alternative of an Immersed Tube Tunnel (ITT). The process of screening design options and selecting a locally preferred alternative was not managed by the IBR team to an acceptable standard of care. They were clearly negligent because they:
1. Claimed ITT deficiencies that did not exist, and exaggerated others.
2. Provided a single engineering evaluation which contained significant errors and not only confused the public, but IBR leadership as well.
3. Violated state professional licensing laws.
4. Skirted those professional licensing laws to avoid accountability for deceiving the public with false engineering information.
Preparation of the SEIS did not meet the professional engineering licensing laws in both Oregon and Washington and the evaluation should be redone.

Attachment (maximum one):
2024-Eng-Report-Assessing-Tunnel-Option-Robert-Wallis.pdf
JCA comment #: 442

A Civil Engineering Assessment of the Decision To Reject A Tunnel as an Option To Replace The I-5 Bridge Over the Columbia River

November 6, 2024



11/6/2024

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Robert C. Wallis, PE
215 West 4th Street, Suite 102
Vancouver, Washington 98660
360-977-8007

A Civil Engineering Assessment of the Decision To Reject
A Tunnel As An Option To Replace The I-5 Bridge Over the Columbia River

November 6, 2024

1. Introduction

The States of Oregon and Washington recently released a draft EIS for the proposed $7.5 billion project to replace the I-5 bridge across the Columbia River. That project, called the IBR (Interstate Bridge Replacement Program) is being implemented by a group of Oregon and Washington DOT staff and their consultants, herein called the IBR team.

An initial step in the EIS process was the evaluation of technical options to identify a preferred option for further refinement and environmental evaluation. A fixed bridge option was identified as the preferred option and the others were rejected, including the immersed tube tunnel (ITT) option.

Project critics have alleged that the IBR team deceived the public and elected officials when they provided false information regarding the deficiencies of the ITT design option which led to the rejection of that option. This report evaluates the validity of those allegations and their implications.

2. Conclusions

In evaluating the public record, it is concluded that:

1. During the process of screening design options to replace the existing I-5 bridge over the Columbia River, the public and their elected officials were deceived by the IBR team.

2. That deception was related to false and exaggerated claims regarding the deficiencies of the ITT option during the process of screening design options. One of the more significant false claims – that the ITT option would not enable connections to critical streets without significant out-of-direction travel – was in fact contradicted by IBR consulting engineers. That screening process completely lacks credibility.

3. By undermining the credibility of the process of screening design options, the credibility of the recently released draft EIS was also undermined. The process of screening alternatives should be repeated prior to finalizing the EIS.

4. The IBR team's leadership was negligent. They should be held accountable. If the screening process for the technical alternatives is repeated, which it should be, those involved in the previous screening process should not participate.

3. Background

The process of selecting a replacement of the I-5 bridge over the Columbia River began in the mid-1990's - with internal efforts by the ODOT staff to explore options. ODOT staff assumed that the replacement bridge would be a fixed bridge similar to the I-205 bridge except that it would include light rail.

Officially, that process began in 2005 when the Oregon and Washington DOTs were authorized to proceed with what became known as the Columbia River Crossing (CRC) project. Through that CRC process a fixed-bridge design option was selected and advanced through preliminary design and environmental assessment, leading to a final EIS prepared to meet the requirements of the National Environmental Policy Act (NEPA).

The CRC project was officially terminated 2014. The DOTs of both states continued efforts to implement a bridge replacement project. That effort, now named the Interstate Bridge Replacement Program (IBR) began in earnest in 2019. That project has moved forward through five basic decision making steps – all as mandated by NEPA due to the fact that the project was federally funded.

Step 1 – Establish the Project Team

The I-5 bridge is jointly owned by the states of Oregon and Washington, which means the state legislatures are responsible for making key decisions regarding what bridge replacement project gets built and how it is funded. A Bi-state Legislative Committee from both states was established to guide the process and provide oversight. A wide variety of advisory groups including those from local, state, and federal agencies were established to provide input and recommendations. These are collectively referred to as "the public".

Step 2 – Identify Project Goal.

The Bi-state Legislative Committee agreed to a project goal. In this case - the replacement of the existing bridge.

Step 3 – Identify Options that Meet that Goal.

State DOT staff and their consultants (the IBR team), provided the public with technical options that met the project goal of replacing the bridge. Initially, they did not present the public with the option of an ITT . That option was added as a direct result of public input into the Step 3 process.

Step 4 – Evaluate Options and Select A Preferred Option.

IBR leadership gathered technical information to help inform the public decision-making process. Most of that information came from previous studies completed as part of the CRC. Because the ITT design option was not evaluated in the CRC process, an engineering evaluation of the ITT design option was completed by IBR consultants, and summarized in an engineering report made available to the public. That report was entitled Tunnel Concept Assessment.

Project advisory groups, using a consistent set of parameters to apply to each technical option, compared each option to the others through a screening process to select a locally preferred alternative (LPA). It is important to note that the LPA became a foundational decision to serve as a basis for Step 5 efforts.

That process of evaluating and comparing the technical options was summarized in a

memorandum called the River Crossing Option Comparison. That memorandum reflected what the IBR advised the public and their elected officials during the public meetings and workshops where the technical options were discussed. The most significant category of that advice was technical, based upon the engineering expertise of the IBR team.

Step 5 –Advance Design Efforts and Address Environmental Impacts.

The evaluation of project impacts for the LPA was completed and summarized in a draft EIS which met the requirements of the National Environmental Policy Act.

The first four of these steps are taken for every complex public infrastructure project regardless of whether it is implemented by federal, state, or local government. The intent of this process is to assure that agency staff deliver a project which meets public needs as opposed to their own institutional needs, or the needs of special interest groups having influence over them. The process enables citizens, who pay for public projects, to dictate through their elected officials, what "public" project, if any, gets built.

4. How the Public Was Deceived

The public was deceived by false and misleading technical information regarding the deficiencies of the ITT design option. That information was represented to the public as being the professional opinion of engineers, when it was not.

During the Step 3 process of reviewing and assessing the technical options, there was considerable interest by the public in the ITT design option and strong advocacy for that option. That interest largely disappeared when the IBR team falsely claimed that the ITT design option had a fatal flaw.

The alleged fatal flaw in the ITT option was that it could not enable connections to streets in Downtown Vancouver and Hayden Island or SR-14 without significant out-of-direction travel. That claim was totally untrue, and in fact was explicitly contradicted by the engineering report prepared by IBR team consultants that summarized the engineering evaluation of the ITT design option – the Tunnel Concept Assessment.

In addition to making the false claim regarding connections, the IBR team appears to have exaggerated other ITT tunnel deficiencies.

The IBR team's false and exaggerated claims regarding ITT option deficiencies were made in numerous public meetings and workshops. They were discussed in the report which summarized the process of screening design options – the River Crossing Option Comparison. Those deficiencies were listed in a "fact sheet" that was distributed to the public and made available on their website. That fact sheet - "Why Not A Tunnel" is quoted as follows:

"The tunnel design concepts have already been analyzed as river crossing options. Tunnel options do not best address the transportation issues identified in the I-5 bridge corridor, and would result in multiple challenges in the program area. Because of these challenges, tunnel options were removed from consideration.

Analysis of the tunnel options identified the following challenges:

- *Significant out-of-direction travel for drivers, freight, emergency response vehicles, transit users, bicyclists and pedestrians*
- *The inability to tie into existing connections such as SR 14, Vancouver City Center and Hayden Island*
- *Potential safety concerns for bicyclists and pedestrians*
- *The potential for significant archaeological, cultural and environmental impacts*
- *Cost estimates for a tunnel are estimated to be approximately two times higher than cost estimates for a replacement bridge and approaches. This estimate does not include other highway, interchange or high-capacity transit improvements that would be necessary."*

The first two of these deficiencies are one and the same (the inability to connect means significant out-of-direction travel). If true, *which was not the case*, the ITT design option would not be practical.

The Alleged Deficiencies Regarding Out-of-Direction Travel and Inability to Make Critical Street Connections.

The first two claims regarding ITT deficiencies were that the ITT option would:

1. Present "*Significant out-of-direction travel for drivers, freight, emergency response vehicles, transit users, bicyclists and pedestrians?*
2. Result in "*The inability to tie into existing connections such as SR 14, Vancouver City Center and Hayden Island"?*

Again, they are one and the same. The essential assumption that supports the claim that connections to critical streets cannot be made is that the ITT design option could not include interchange ramps. The IBR design team deceived the public when they told them told that those ramps were impractical. Please note what the IBR team stated in the River Crossing Option Comparison document. They stated that the ITT design option:

> "Requires **unconventional and complex** below-grade construction to accommodate interchange connections consisting of cut and cover tunnels with large temporary excavations. This would make **construction impractical".**

The bold sentences are from the IBR report.

The River Crossing Option Comparison also stated:

> *"The Tunnel Concept Assessment concluded that an ITT is technically feasible; however, there are numerous challenges, as identified in Table 5. These challenges include significant out-of-direction travel for drivers, freight, transit users, bicyclists and pedestrians; the inability to tie into existing connections, such as SR 14, Vancouver City Center, and Hayden Island."*

Compare that comment with the only mention of that issue in the engineering report – Tunnel Concept Assessment and it will become clear that the IBR team's intent was deceit.

> "The ITT would be connected to the above-ground roadway network via cut-and-cover and retained cut connections at either end. Excavation support for these end connections could differ between Vancouver and Hayden Island, as excavations in Vancouver are anticipated to be primarily in gravel alluvium, whereas excavations on Hayden Island are anticipated to be primarily in silt/sand alluvium. The deepest excavations could require ground support systems consisting of braced or restrained secant pile or slurry walls, while shallower excavations may require less robust ground support systems. Ground improvement measures could be incorporated to decrease the potential for seepage through the base of the excavation and to provide long-term support for the constructed cut-and- cover and retained cut sections."

The comment "would be connected to the above grade roadway network" is a total contradiction to what the IBR told the public during the alternative screening process as quoted previously.

In the engineering report prepared by IBR consultants, there is no mention whatsoever of those connections being "impractical". The Tunnel Concept Assessment clearly contradicted the claim about connections. Connections are in fact practical and with those connections, there are no out-of-direction travel deficiencies.

In public meetings and workshops, the IBR team leadership told the public repeatedly that, because there could be no connections from the tunnel to surface streets, frontage roads would be required from the ends of the tunnel where it daylighted at each end over 1,000 feet from the river banks. To get to any point near the river (streets in downtown Vancouver, SR-14, and Hayden Island, would require exiting the tunnel where it surfaced, and back-tracking to where I-5 crossed the streets through those frontage roads, thus the "out-of-direction travel". Here is a quote from the Option Comparison document:

> "As shown, an ITT would likely daylight on the southern end of Hayden Island in Portland and near Evergreen Boulevard in Vancouver. This would eliminate connections to I-5 at SR-14 and Hayden Island."

Those alleged frontage roads would have had drastic impacts upon Downtown Vancouver and Hayden Island. Those business and property owners who had shown initial interest in the ITT design due to the fact that it avoided what they perceived to be "bridge blight" completely lost interest upon being deceived into believing that their properties and businesses would have been devastated by frontage roads. If the IBR team was correct about the inability of the ITT design option to connect to downtown Vancouver streets, it would have effectively destroyed that downtown.

The Alleged Deficiency Regarding Potential Safety Concerns for Bicyclists and Pedestrians

Although there are no meaningful safety concerns for a well-designed tunnel, the fact is that if not designed well or policed, there could be a safety concern. The exact holds true for the fixed bridge options massive above-ground vehicle and pedestrian ramps as well, however that

potential deficiency was not identified for the fixed bridge option. Nor was it noted that the fixed bridge option could "potentially" present additional safety concerns related to the fact that, unlike the ITT design option, pedestrians and bicyclists will be exposed to weather conditions that would result in in slippery surfaces and that associated fall hazards would be increased by high winds.

The Alleged Deficiency Regarding Archaeological, Cultural and Environmental Impacts

The fact that more ground would be excavated with the ITT design option than with the fixed bridge option does mean that there are potentially more archeological impacts. It should be noted that there is no mention of the fact that just downriver from the proposed tunnel, Vancouver's Waterfront Development was constructed with significantly more excavation and site disturbance than would occur with the ITT design option construction. That vast amount of excavation did not have any archeological impacts or cultural impacts.

Nor does the IBR team mention the opportunities that the ITT option would provide for enhancement of cultural resource in the vast amount of open space created above the tunnel.

The IBR team members have emphasized the environmental impacts of dredging, without mentioning the fact that those impacts can be easily managed. The dredging required to install the ITT design option is in fact a small percentage of the dredging that occurs every year to maintain the Columbia River shipping channel.

The Alleged Deficiencies Regarding Cost Estimates

The IBR team stated that the ITT design option would cost twice as much as the fixed bridge option. That statement is very questionable.

The fact that when the IBR team initially provided a cost estimate, it appears to have been based upon three engineering errors that exaggerated costs. One was the assumption that the existing navigation channel would not be relocated for the ITT option. The second was the error made in assuming frontage roads would be required to access critical street connections. The third was an error in the estimated excavation quantities which significantly increased the cost estimate for the ITT design option. Both errors were brought to the attention of the IBR team. They failed to acknowledge the first two errors. They corrected the second but continued to claim that the ITT option was "twice the cost".

The error regarding the ITT option's inability to connect to critical streets is discussed in the previous section. The error in excavation quantities was acknowledged by the IBR team, and thus does not require addressing. The error regarding the navigation channel relocation is discussed in the following subsection.

The Error Regarding The Navigation Channel Location Assumption

The IBR team assumed that the main navigation channel would be relocated for the fixed-bridge option, but not the ITT option. In doing so, the depth, cost, and construction challenges of the ITT option were all exaggerated.

The Tunnel Concept Assessment report included a vertical alignment that was significantly deeper than need be as the result of the failure to assume the main navigation channel would be relocated from its existing location near the north bank of the Columbia to the center of the river. To make that assumption suggests negligence. To understand this please note:

1. As shown on Figure 3 from the Tunnel Concept Assessment (available for review on the IBR project website under "Technical Documents"), there are currently three navigation channels crossing the potential alignments of the tunnel, with the Primary Channel being located within close proximity to the north bank of the Columbia River under the lift-span of the bridge. In addition, there are two barge channels located under the two highest spans of the existing bridge to the south.

2. As shown on Figure 4 from the Tunnel Concept Assessment, the low point of the tunnel was assumed to be below the Primary Channel near the north bank of the Columbia. With the assumption that the Primary Channel will not be relocated, the low point of the tunnel is at approximate 100 feet below the north bank of the river.

3. If a tunnel were to be constructed, regardless of its depth, it is logical to assume that the three channels would be combined into a single channel in the middle of the river. That navigation channel is currently maintained through the entire length of the Columbia from its mouth to Vancouver, except at bridges, where several smaller channels are needed to avoid bridge piers.

4. A credible conceptual tunnel conceptual design would have assumed that the channel would be relocated to the center of the river. Doing so would have put the low-point of the tunnel near the center of the river instead of near the north bank. By sloping the tunnel up from the center of the river to the river banks, the tunnel would be much higher in elevation at its bank and inland. Instead of the tunnel being 90 feet deep at the bank as was assumed in the flawed DOT conceptual design, it would be about 50 feet deep.

In short, by failing to assume the Primary Channel would be relocated to the center of the river, which would be a logical assumption, the tunnel was conceptually designed to be much deeper than necessary where it touches upon land on both sides of the river.

5. The Impact of the Deception Upon the Draft EIS

The draft EIS was prepared assuming the initial screening process was credible, which it was not. That EIS addresses only the fixed bridge option. Without a credible alternative screening process, the draft EIS is not credible.

The process of screening design options resulted in the selection of a locally preferred alternative (LPA). The selection of the LPA was a foundational decision that established the design option upon which the EIS was based. In essence, the draft EIS was prepared based upon a decision that was the end result of deception by the IBR team.

The screening process needs to be repeated without the deception that dominated the process that

resulted in the draft EIS. Those on the IBR team involved in that screening process should not be involved in a repeat of that process. They completely lack credibility.

6. Why IBR Leadership Should Be Held Accountable for Negligence

Negligence is the failure to behave with the level of care that a reasonable person would have exercised under the same circumstances.

It is clear that the process of screening design options and selected a locally preferred alternative was not managed by the IBR team to an acceptable standard of care. They were clearly negligent because they:

1. Claimed ITT deficiencies that did not exist, and exaggerated others.
2. Provided a single engineering evaluation which contained significant errors and not only confused the public, but IBR leadership as well.
3. Violated state professional licensing laws.
4. Skirted those professional licensing laws to avoid accountability for deceiving the public with false engineering information

These acts of negligence are discussed in the following paragraphs.

Exaggeration of Deficiencies

The IBR leadership was negligent in claiming deficiencies when they did not exist, and exaggerating others. That matter is discussed in Section 5 above.

The Deficiencies in the Tunnel Concept Assessment

As mentioned above, of the Tunnel Concept Assessment contradicted what the public was told by the IBR team leadership. Apparently, IBR team leadership were unable to understand the Tunnel Concept Assessment. That suggests that the report was seriously flawed. The IBR team leadership was negligent in not providing the public with an engineering evaluation and report which provided the engineering information that was critical to the success of the public's decision-making process.

The Tunnel Assessment Report Violated Washington State Licensing Laws

Washington State has well-written laws that govern the practice of engineering and the requirements for stamping engineering documents. There are good reasons for those laws, further discussed below. Washington Administrative Code (WAC) WAC 196-23-020 states:

Seal/stamp usage.

> *"The use of the seal/stamp must be in accordance with chapter **18.43** RCW or as otherwise described herein:*
>
> *(1) Final documents are those documents that are prepared and distributed for filing with public officials, use for construction, final agency approvals or use by clients. Any final document must contain the seal/stamp, signature and date of signature of the licensee who prepared or directly supervised the work. For the purpose of this section*

> *"document" is defined as plans, specifications, plats, surveys, land descriptions as defined in WAC* ***332-130-020****, reports, and as-built documents prepared by the licensee. (2) Preliminary documents are those documents not considered final as defined herein, but are released or distributed by the licensee. Preliminary documents must be clearly identified as "preliminary" or contain such wording so it may be differentiated from a final document.* The fact is the TCA was "distributed for filing with public officials" for "final agency approvals".

When released to the public, the Tunnel Concept Assessment did not have a professional stamp. Whether that was for purposes of avoiding accountability, or an oversight, that action clearly violated Washington's licensing law and suggests negligence on the part of the IBR team.

The IBR Team Skirted Professional Licensing Laws.

It is the job of public agency staff and their consultants to inform the public and their elected officials. The IBR team has focused on influencing them, not informing them. In doing so, they have not only violated state licensing laws, but skirted those laws.

The success of the IBR project, like all complex public infrastructure projects depends upon the expertise and ethics of the professional engineers who the public relies upon for advice and opinions on technical matters. State licensing laws exist to provide a mechanism to ensure high professional standards. The public and their elected officials need to trust engineers. Those laws ensure the engineers do not betray that trust.

A key requirement of engineering licensing laws is that engineering reports be stamped by a professional engineer. If that report does have errors that do not reflect an acceptable standard of professional care, the engineer who stamped the report can be held accountable.

The value of these professional licensing laws is made very clear by the fact that IBR leadership falsely claimed that the ITT design option had a fatal flaw, when it did not. Unlike most of the false and misleading claims by the IBR team, this particular claim was addressed in an engineering report which had to be stamped by a professional engineer who could be held accountable. For that reason, the engineering report stated the truth about the fatal flaw false claim made by the IBR team, which totally contradicted the statements by IBR team members interfacing with the public.

The state licensing laws in Washington differ from those in Oregon in that preliminary documents containing engineering information are required to be stamped in Washington and not in Oregon. In Oregon, only final documents need be stamped. That is a flaw in Oregon licensing law because the preliminary documents are used in decision making for those complex projects that require the evaluation of design alternatives. That was exactly what occurred in the decision making process that led to the LPA – preliminary technical information led to the selection of the LPA.

The single technical document prepared to date that was stamped by a professional engineer is the Tunnel Concept Assessment. That document was only stamped after an informal complaint was made to the Washington State Board of Professional Engineers, whose efforts ultimately led

the IBR team to stamp the report.

The IBR team has released other technical documents to the public as can be seen on their website. Because they are technical documents, they should be stamped by a professional engineer, whether they are deemed preliminary or final. None are. The IBR team is negligent in not having them stamped.

Initially, the IBR team members resisted providing an engineering stamp to the Tunnel Concept Assessment. They will likely resist doing so for the other reports. Although Oregon does not have a requirement for providing a professional stamp to preliminary engineering documents, they do for final engineering documents. ODOT also has specific guidelines that address what technical documents need to be stamped by an engineering – TSP11-02d found at https://www.oregon.gov/odot/Engineering/Doc_TechnicalGuidance/TSB11-02d.pdf

That ODOT guidance document makes it clear what technical documents require an engineering stamp. WSDOT does not appear to have specific guidance but does clearly require that preliminary documents be stamped: "Project Delivery Memo #21-02 – Applying Professional Stamps" accessible at https://wsdot.wa.gov/publications/fulltext/ProjectDev/ProjectDeliveryMemos/Memo21-02.pdf

Considering the fact that the IBR project is required to meet the laws in both Oregon and Washington, it is clear that all of the technical documents listed on the IBR website should be stamped. Given the fact that other aspects of the project besides the decision to reject the ITT design option are dependent upon technical documents to support those decisions, it is clear that they also should be listed as Technical Documents and stamped by a professional engineer. For instance, there are technical documents listed as "Program Fact Sheets" and "Financial Reports" that are clearly based upon engineering, and should be stamped by a professional engineer. None are, with the end result that the professional licensing laws are being skirted.

As mentioned above, professional engineers are held to professional standards that limit their ability to deceive without being held accountable. The IBR team has repeatedly made engineering claims which were alleged to reflect engineering opinions without providing any documentation that would support such opinions. In doing so, they skirted the professional licensing laws and avoided accountability for failure to comply with an acceptable standard of professional care.

IBR Draft SEIS - RECORD #2475 DETAIL

First Name :	LAURA
Last Name :	MILLER
Attachments :	DSEIS-2475_Miller_Original.pdf (274 kb) West_Side_Mulituse_Path_Laura Miller.pdf (273 kb)

IBR Draft SEIS - RECORD #2475 DETAIL

Submission Date :	11/15/2024
First Name :	LAURA
Last Name :	MILLER
Business/Organization/Agency :	
Attachments :	West_Side_Mulituse_Path_Laura Miller.pdf (273 kb)

Submission Input :

So many things to consider. Almost an over-whelming project. We moved here almost twelve years ago. All the research, planning, etc., for a new bridge was scraped. Such a waste of money.

The US Coast Guard should be priority one, along with PDX airport. If you cannot get these folks around a table to come to an agreement, you might as well go home.

I live in the Bridgeton neighborhood. Lucky me, right? Our neighborhood association was diligent enough to take the time to think out all the concerns for us. I submit to you in separate emails every document that covers the suggestion and concerns.

* Looks matter. Do not build an ugly bridge.
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* 40-Mile loop must be well thought out; the pride of our bike riding state.
* Build a bridge that considers multiuse paths
* MLK on ramp must be better, way better than what we have now.

Thank you,

Laura Miller

[redacted]

[redacted]

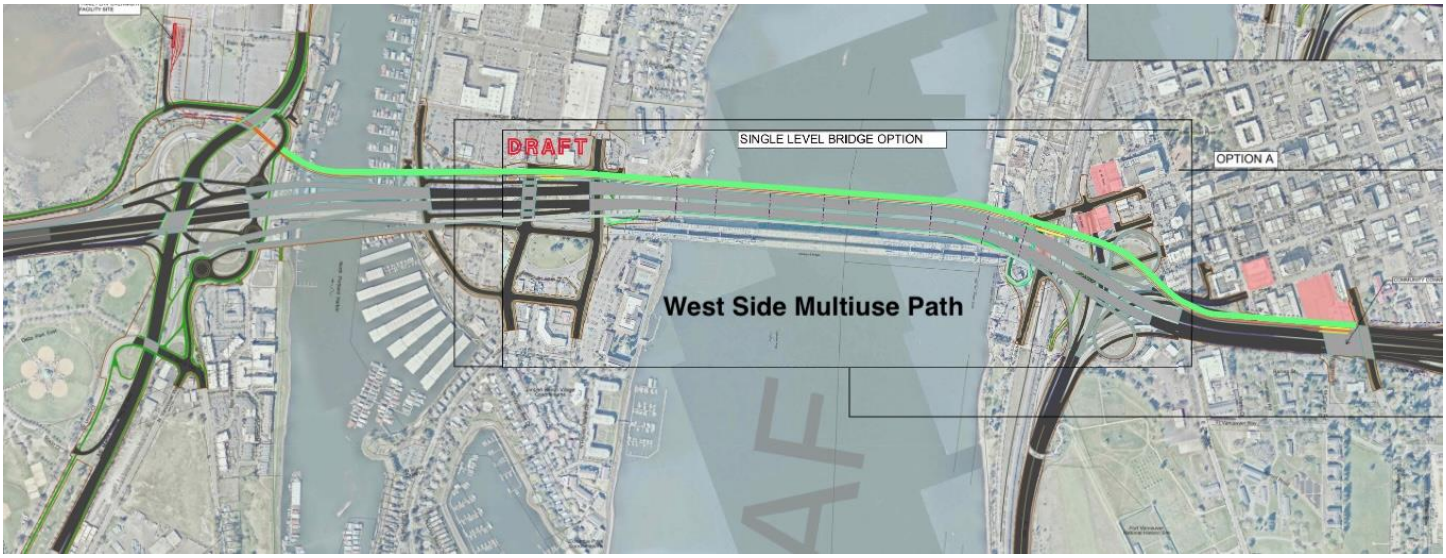
[redacted]

Comments on Studying building both the multi-use path and the light rail line on the west side of the south bound main bridge

The IBR proposes building the light rail line on the south bound main bridge and the multiuse path on the north bound main bridge span. The IBR proposal makes each system separate from each other. The IBR proposal makes connections between these two systems difficult and inefficient for transit and active transportation users.

The IBR proposal has stairs and elevators providing connections for transit users but the stairs and elevators are not usable for users of the multi-use path. The multi-use path has ramp connections for users that are not usable for transit riders. Though these two systems are parallel to each other, but they are entirely separated systems. These systems do not connect easily even though active transportation users want to connect to transit.

We believe additional study is needed to connect these two systems together. People who are not driving to their destination, a goal of the IBR, will often use several modes to reach their destination. Users may ride their bikes to a light rail station, place their bikes on the train in storage specially design for bikes on the light rail train, then ride their bikes for the final leg of their trip. The IBR design of entirely separate light rail and multiuse path makes these blended trips difficult.



One idea that needs to be studied more is to build the multiuse path next to the light rail alignment on the south bound main bridge. Compared to the multiuse path on the east side of the main bridge, the multiuse path on the west side next to the light rail alignment better meets the purpose and needs statement for the IBR to (b) improve connectivity, reliability, travel times, and operations of public transportation modal alternatives in the Program area. The west side alignment provides the following improvements:

• Seamless Transition: Users should easily switch between transit and active transportation at any station, with no grade changes or distance barriers.

• Shared Elevator Access: Allowing active transportation users to share transit station elevators eliminates the need for additional infrastructure, making the design more efficient and accessible.

• Creates reductant ways to connect to both transit and multiuse path: If the elevator is not working, users can use the ramp or stairs. User not able to negotiate going up the long ramps can use the elevator. Bike users who get a flat tire on the multiuse path can connect to the light rail station and still get to their destination.

• Provides Eyes on the Path: Transit operators and passengers provide a continuous presence, reducing the isolation felt on a multi-use path and enhancing safety and comfort.

• Better Emergency Egress: The multi-use path should double as an emergency exit route for the transit way, supporting user safety during unexpected events.

• Inclusive Design Principles: These principles ensure the accessibility and usability of both transit and active transportation facilities for individuals of all abilities.

• By building the multiuse path on the west side of the light rail trackway provides greater separation from vehicle noise and would offer a more pleasant experience for active transportation users compared to a multiuse path on the east side immediately next to vehicle travel.

• If the multiuse path was built next to the light rail line on the light rail bridge crossing North Portland Harbor, then the multiuse path connection to the 40 Mile loops would be direct rather than out of direction when the multiuse path is on the local Harbor Bridge.

Regarding Views: There is a good view of Mt Hood if the multiuse path in on the east side of the north bound main bridge, however there is a good view to the west too. Additionally, a quality view of North Portland Harbor and Mt Hood views could be experienced on the local harbor bridge, but the IBR proposes the multiuse path on the west side of that local Harbor Bridge. The IBR also shows a side walk on the east side of the local Harbor Bridge. We propose that the side walk on the east side of the Local Harbor Bridge be as wide as possible and include wide spots for stopping on the route to rest and appreciate one of the region's best view of North Portland Harbor.

View East from Local Harbor Bridge

Thank you, Laura Miller [redacted]

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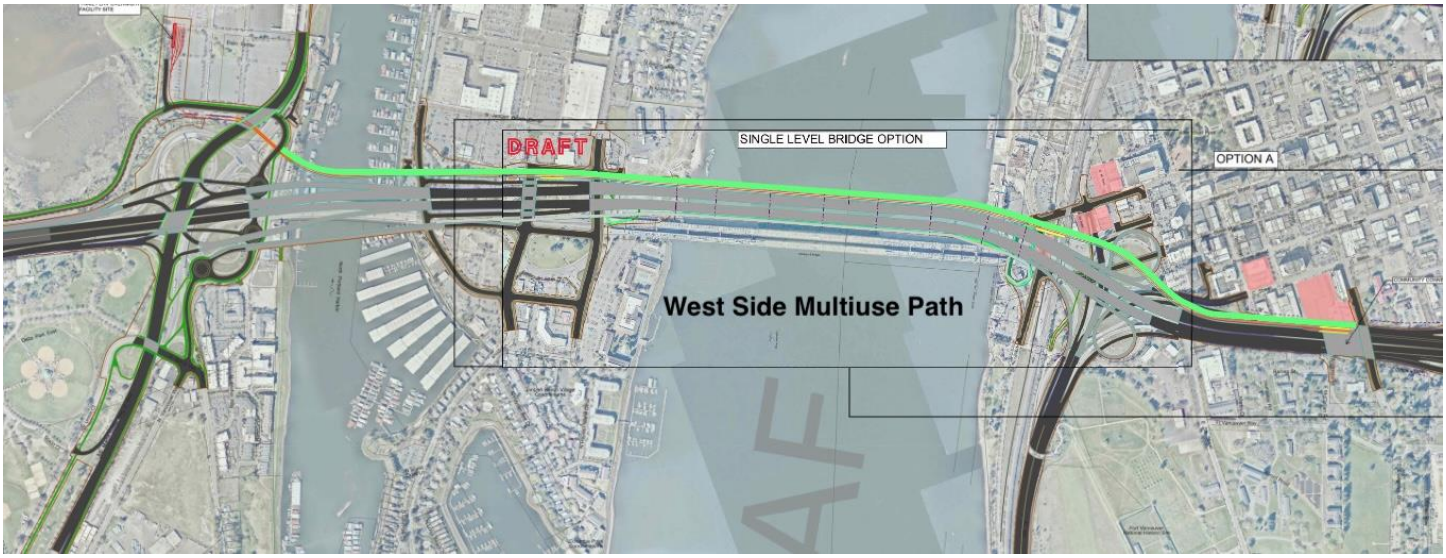

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View East from Local Harbor Bridge

Thank you, Laura Miller 424 N. Bridgeton Road Portland, OR 97217

IBR Draft SEIS - RECORD #2476 DETAIL

First Name :	LAURA
Last Name :	MILLER
Attachments :	DSEIS2476_Miller_Original.pdf (218 kb) Synergies_Empowered_by_the_IBR_Laura Miller.pdf (222 kb)

IBR Draft SEIS - RECORD #2476 DETAIL

Submission Date :	11/15/2024
First Name :	LAURA
Last Name :	MILLER
Business/Organization/Agency :	
Attachments :	Synergies_Empowered_by_the_IBR_Laura Miller.pdf (222 kb)

Submission Input :

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[redacted]

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Synergies Empowered by the IBR

Coordinate synergies between improvements by the IBR and other large public and private projects being constructed at the same time. This synergy coordinated by the Cities of Portland and Vancouver could create public amenities greater than any of the individual projects could provide on their own.

Example: **Create Bridgeton Trail Segment of the 40 Mile Loop**

1) IBR Road system requires acquisition of property in order to build the new Harbor Bridges. That property under the new bridges finally puts into public ownership a key missing trail segment of the 40 Mile Loop.
2) At the same time as the IBR, the Army Corp of Engineers is upgrading the adjacent levee. The improved levee will be higher in elevation and finished with a compacted gravel maintenance road.
3) That key trail segment is also located in an existing Portland urban renewal district. The urban renewal district has already designed the finished trail, amenities and connections to local walkways. The urban renewal district had set aside funds to do the finish work once the trail easements were acquired.
4) By completing this Trail segment, Hundreds of residential units in Bridgeton have a direct, protected and safe way to walk and roll to the Expo Light Rail Station. This enhances ridership numbers for the IBR Light Rail and FTA funding requests.

The City of Portland can coordinate these projects together. Work IBR is already planning to do can create a synergy that builds a key piece of Trail infrastructure greater than any one project could do on their own.

This is just one example of possible synergies empowered through the IBR.
There are other synergies for Hayden Island, Vancouver Waterfront and Historic Reserve.

Thank You!

Laura Miller
[redacted]
[redacted]

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Portland, OR 97217

IBR Draft SEIS - RECORD #2477 DETAIL

First Name :	Robert
Last Name :	Wallis
Attachments :	DSEIS-2477_Wallis_Original.pdf (492 kb) 2024 Eng Report Assessing Tunnel Option Robert Wallis.pdf (491 kb)

IBR Draft SEIS - RECORD #2477 DETAIL

Submission Date :	11/15/2024
First Name :	Robert
Last Name :	Wallis
Business/Organization/Agency :	
Attachments :	2024 Eng Report Assessing Tunnel Option Robert Wallis.pdf (491 kb)

Submission Input :

Please see the attached Engineering Report and accept as a comment on the SEIS and its deficiencies. It was clearly deficient in evaluating the alternative of an Immersed Tube Tunnel (ITT). The process of screening design options and selecting a locally preferred alternative was not managed by the IBR team to an acceptable standard of care. They were clearly negligent because they:

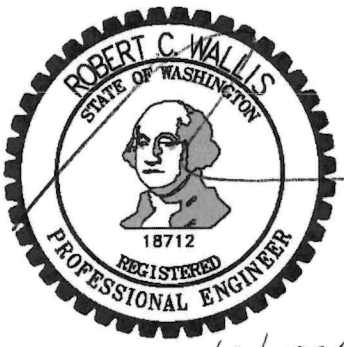
1. Claimed ITT deficiencies that did not exist, and exaggerated others.
2. Provided a single engineering evaluation which contained significant errors and not only confused the public, but IBR leadership as well.
3. Violated state professional licensing laws.
4. Skirted those professional licensing laws to avoid accountability for deceiving the public with false engineering information.

Preparation of the SEIS did not meet the professional engineering licensing laws in both Oregon and Washington and the evaluation should be redone.

Robert Wallis, PE

A Civil Engineering Assessment of the Decision To Reject A Tunnel as an Option To Replace The I-5 Bridge Over the Columbia River

November 6, 2024



11/6/2024

Table of Contents

Robert C. Wallis, PE
215 West 4th Street, Suite 102
Vancouver, Washington 98660
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November 6, 2024

1. Introduction

The States of Oregon and Washington recently released a draft EIS for the proposed $7.5 billion project to replace the I-5 bridge across the Columbia River. That project, called the IBR (Interstate Bridge Replacement Program) is being implemented by a group of Oregon and Washington DOT staff and their consultants, herein called the IBR team.

An initial step in the EIS process was the evaluation of technical options to identify a preferred option for further refinement and environmental evaluation. A fixed bridge option was identified as the preferred option and the others were rejected, including the immersed tube tunnel (ITT) option.

Project critics have alleged that the IBR team deceived the public and elected officials when they provided false information regarding the deficiencies of the ITT design option which led to the rejection of that option. This report evaluates the validity of those allegations and their implications.

2. Conclusions

In evaluating the public record, it is concluded that:

1. During the process of screening design options to replace the existing I-5 bridge over the Columbia River, the public and their elected officials were deceived by the IBR team.

2. That deception was related to false and exaggerated claims regarding the deficiencies of the ITT option during the process of screening design options. One of the more significant false claims – that the ITT option would not enable connections to critical streets without significant out-of-direction travel – was in fact contradicted by IBR consulting engineers. That screening process completely lacks credibility.

3. By undermining the credibility of the process of screening design options, the credibility of the recently released draft EIS was also undermined. The process of screening alternatives should be repeated prior to finalizing the EIS.

4. The IBR team's leadership was negligent. They should be held accountable. If the screening process for the technical alternatives is repeated, which it should be, those involved in the previous screening process should not participate.

3. Background

The process of selecting a replacement of the I-5 bridge over the Columbia River began in the mid-1990's - with internal efforts by the ODOT staff to explore options. ODOT staff assumed that the replacement bridge would be a fixed bridge similar to the I-205 bridge except that it would include light rail.

Officially, that process began in 2005 when the Oregon and Washington DOTs were authorized to proceed with what became known as the Columbia River Crossing (CRC) project. Through that CRC process a fixed-bridge design option was selected and advanced through preliminary design and environmental assessment, leading to a final EIS prepared to meet the requirements of the National Environmental Policy Act (NEPA).

The CRC project was officially terminated 2014. The DOTs of both states continued efforts to implement a bridge replacement project. That effort, now named the Interstate Bridge Replacement Program (IBR) began in earnest in 2019. That project has moved forward through five basic decision making steps – all as mandated by NEPA due to the fact that the project was federally funded.

Step 1 – Establish the Project Team

The I-5 bridge is jointly owned by the states of Oregon and Washington, which means the state legislatures are responsible for making key decisions regarding what bridge replacement project gets built and how it is funded. A Bi-state Legislative Committee from both states was established to guide the process and provide oversight. A wide variety of advisory groups including those from local, state, and federal agencies were established to provide input and recommendations. These are collectively referred to as "the public".

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State DOT staff and their consultants (the IBR team), provided the public with technical options that met the project goal of replacing the bridge. Initially, they did not present the public with the option of an ITT . That option was added as a direct result of public input into the Step 3 process.

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That process of evaluating and comparing the technical options was summarized in a

memorandum called the River Crossing Option Comparison. That memorandum reflected what the IBR advised the public and their elected officials during the public meetings and workshops where the technical options were discussed. The most significant category of that advice was technical, based upon the engineering expertise of the IBR team.

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The alleged fatal flaw in the ITT option was that it could not enable connections to streets in Downtown Vancouver and Hayden Island or SR-14 without significant out-of-direction travel. That claim was totally untrue, and in fact was explicitly contradicted by the engineering report prepared by IBR team consultants that summarized the engineering evaluation of the ITT design option – the Tunnel Concept Assessment.

In addition to making the false claim regarding connections, the IBR team appears to have exaggerated other ITT tunnel deficiencies.

The IBR team's false and exaggerated claims regarding ITT option deficiencies were made in numerous public meetings and workshops. They were discussed in the report which summarized the process of screening design options – the River Crossing Option Comparison. Those deficiencies were listed in a "fact sheet" that was distributed to the public and made available on their website. That fact sheet - "Why Not A Tunnel" is quoted as follows:

> *"The tunnel design concepts have already been analyzed as river crossing options. Tunnel options do not best address the transportation issues identified in the I-5 bridge corridor, and would result in multiple challenges in the program area. Because of these challenges, tunnel options were removed from consideration.*

Analysis of the tunnel options identified the following challenges:

- *Significant out-of-direction travel for drivers, freight, emergency response vehicles, transit users, bicyclists and pedestrians*
- *The inability to tie into existing connections such as SR 14, Vancouver City Center and Hayden Island*
- *Potential safety concerns for bicyclists and pedestrians*
- *The potential for significant archaeological, cultural and environmental impacts*
- *Cost estimates for a tunnel are estimated to be approximately two times higher than cost estimates for a replacement bridge and approaches. This estimate does not include other highway, interchange or high-capacity transit improvements that would be necessary."*

The first two of these deficiencies are one and the same (the inability to connect means significant out-of-direction travel). If true, *which was not the case*, the ITT design option would not be practical.

The Alleged Deficiencies Regarding Out-of-Direction Travel and Inability to Make Critical Street Connections.

The first two claims regarding ITT deficiencies were that the ITT option would:

1. Present "*Significant out-of-direction travel for drivers, freight, emergency response vehicles, transit users, bicyclists and pedestrians?*
2. Result in "*The inability to tie into existing connections such as SR 14, Vancouver City Center and Hayden Island"?*

Again, they are one and the same. The essential assumption that supports the claim that connections to critical streets cannot be made is that the ITT design option could not include interchange ramps. The IBR design team deceived the public when they told them told that those ramps were impractical. Please note what the IBR team stated in the River Crossing Option Comparison document. They stated that the ITT design option:

> "Requires **unconventional and complex** below-grade construction to accommodate interchange connections consisting of cut and cover tunnels with large temporary excavations. This would make **construction impractical".**

The bold sentences are from the IBR report.

The River Crossing Option Comparison also stated:

> *"The Tunnel Concept Assessment concluded that an ITT is technically feasible; however, there are numerous challenges, as identified in Table 5. These challenges include significant out-of-direction travel for drivers, freight, transit users, bicyclists and pedestrians; the inability to tie into existing connections, such as SR 14, Vancouver City Center, and Hayden Island."*

Compare that comment with the only mention of that issue in the engineering report – Tunnel Concept Assessment and it will become clear that the IBR team's intent was deceit.

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The comment "would be connected to the above grade roadway network" is a total contradiction to what the IBR told the public during the alternative screening process as quoted previously.

In the engineering report prepared by IBR consultants, there is no mention whatsoever of those connections being "impractical". The Tunnel Concept Assessment clearly contradicted the claim about connections. Connections are in fact practical and with those connections, there are no out-of-direction travel deficiencies.

In public meetings and workshops, the IBR team leadership told the public repeatedly that, because there could be no connections from the tunnel to surface streets, frontage roads would be required from the ends of the tunnel where it daylighted at each end over 1,000 feet from the river banks. To get to any point near the river (streets in downtown Vancouver, SR-14, and Hayden Island, would require exiting the tunnel where it surfaced, and back-tracking to where I-5 crossed the streets through those frontage roads, thus the "out-of-direction travel". Here is a quote from the Option Comparison document:

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Those alleged frontage roads would have had drastic impacts upon Downtown Vancouver and Hayden Island. Those business and property owners who had shown initial interest in the ITT design due to the fact that it avoided what they perceived to be "bridge blight" completely lost interest upon being deceived into believing that their properties and businesses would have been devastated by frontage roads. If the IBR team was correct about the inability of the ITT design option to connect to downtown Vancouver streets, it would have effectively destroyed that downtown.

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potential deficiency was not identified for the fixed bridge option. Nor was it noted that the fixed bridge option could "potentially" present additional safety concerns related to the fact that, unlike the ITT design option, pedestrians and bicyclists will be exposed to weather conditions that would result in in slippery surfaces and that associated fall hazards would be increased by high winds.

The Alleged Deficiency Regarding Archaeological, Cultural and Environmental Impacts

The fact that more ground would be excavated with the ITT design option than with the fixed bridge option does mean that there are potentially more archeological impacts. It should be noted that there is no mention of the fact that just downriver from the proposed tunnel, Vancouver's Waterfront Development was constructed with significantly more excavation and site disturbance than would occur with the ITT design option construction. That vast amount of excavation did not have any archeological impacts or cultural impacts.

Nor does the IBR team mention the opportunities that the ITT option would provide for enhancement of cultural resource in the vast amount of open space created above the tunnel.

The IBR team members have emphasized the environmental impacts of dredging, without mentioning the fact that those impacts can be easily managed. The dredging required to install the ITT design option is in fact a small percentage of the dredging that occurs every year to maintain the Columbia River shipping channel.

The Alleged Deficiencies Regarding Cost Estimates

The IBR team stated that the ITT design option would cost twice as much as the fixed bridge option. That statement is very questionable.

The fact that when the IBR team initially provided a cost estimate, it appears to have been based upon three engineering errors that exaggerated costs. One was the assumption that the existing navigation channel would not be relocated for the ITT option. The second was the error made in assuming frontage roads would be required to access critical street connections. The third was an error in the estimated excavation quantities which significantly increased the cost estimate for the ITT design option. Both errors were brought to the attention of the IBR team. They failed to acknowledge the first two errors. They corrected the second but continued to claim that the ITT option was "twice the cost".

The error regarding the ITT option's inability to connect to critical streets is discussed in the previous section. The error in excavation quantities was acknowledged by the IBR team, and thus does not require addressing. The error regarding the navigation channel relocation is discussed in the following subsection.

The Error Regarding The Navigation Channel Location Assumption

The IBR team assumed that the main navigation channel would be relocated for the fixed-bridge option, but not the ITT option. In doing so, the depth, cost, and construction challenges of the ITT option were all exaggerated.

The Tunnel Concept Assessment report included a vertical alignment that was significantly deeper than need be as the result of the failure to assume the main navigation channel would be relocated from its existing location near the north bank of the Columbia to the center of the river. To make that assumption suggests negligence. To understand this please note:

1. As shown on Figure 3 from the Tunnel Concept Assessment (available for review on the IBR project website under "Technical Documents"), there are currently three navigation channels crossing the potential alignments of the tunnel, with the Primary Channel being located within close proximity to the north bank of the Columbia River under the lift-span of the bridge. In addition, there are two barge channels located under the two highest spans of the existing bridge to the south.

2. As shown on Figure 4 from the Tunnel Concept Assessment, the low point of the tunnel was assumed to be below the Primary Channel near the north bank of the Columbia. With the assumption that the Primary Channel will not be relocated, the low point of the tunnel is at approximate 100 feet below the north bank of the river.

3. If a tunnel were to be constructed, regardless of its depth, it is logical to assume that the three channels would be combined into a single channel in the middle of the river. That navigation channel is currently maintained through the entire length of the Columbia from its mouth to Vancouver, except at bridges, where several smaller channels are needed to avoid bridge piers.

4. A credible conceptual tunnel conceptual design would have assumed that the channel would be relocated to the center of the river. Doing so would have put the low-point of the tunnel near the center of the river instead of near the north bank. By sloping the tunnel up from the center of the river to the river banks, the tunnel would be much higher in elevation at its bank and inland. Instead of the tunnel being 90 feet deep at the bank as was assumed in the flawed DOT conceptual design, it would be about 50 feet deep.

In short, by failing to assume the Primary Channel would be relocated to the center of the river, which would be a logical assumption, the tunnel was conceptually designed to be much deeper than necessary where it touches upon land on both sides of the river.

5. The Impact of the Deception Upon the Draft EIS

The draft EIS was prepared assuming the initial screening process was credible, which it was not. That EIS addresses only the fixed bridge option. Without a credible alternative screening process, the draft EIS is not credible.

The process of screening design options resulted in the selection of a locally preferred alternative (LPA). The selection of the LPA was a foundational decision that established the design option upon which the EIS was based. In essence, the draft EIS was prepared based upon a decision that was the end result of deception by the IBR team.

The screening process needs to be repeated without the deception that dominated the process that

resulted in the draft EIS. Those on the IBR team involved in that screening process should not be involved in a repeat of that process. They completely lack credibility.

6. Why IBR Leadership Should Be Held Accountable for Negligence

Negligence is the failure to behave with the level of care that a reasonable person would have exercised under the same circumstances.

It is clear that the process of screening design options and selected a locally preferred alternative was not managed by the IBR team to an acceptable standard of care. They were clearly negligent because they:

1. Claimed ITT deficiencies that did not exist, and exaggerated others.
2. Provided a single engineering evaluation which contained significant errors and not only confused the public, but IBR leadership as well.
3. Violated state professional licensing laws.
4. Skirted those professional licensing laws to avoid accountability for deceiving the public with false engineering information

These acts of negligence are discussed in the following paragraphs.

Exaggeration of Deficiencies

The IBR leadership was negligent in claiming deficiencies when they did not exist, and exaggerating others. That matter is discussed in Section 5 above.

The Deficiencies in the Tunnel Concept Assessment

As mentioned above, of the Tunnel Concept Assessment contradicted what the public was told by the IBR team leadership. Apparently, IBR team leadership were unable to understand the Tunnel Concept Assessment. That suggests that the report was seriously flawed. The IBR team leadership was negligent in not providing the public with an engineering evaluation and report which provided the engineering information that was critical to the success of the public's decision-making process.

The Tunnel Assessment Report Violated Washington State Licensing Laws

Washington State has well-written laws that govern the practice of engineering and the requirements for stamping engineering documents. There are good reasons for those laws, further discussed below. Washington Administrative Code (WAC) WAC 196-23-020 states:

Seal/stamp usage.

> *"The use of the seal/stamp must be in accordance with chapter **18.43** RCW or as otherwise described herein:*
>
> *(1) Final documents are those documents that are prepared and distributed for filing with public officials, use for construction, final agency approvals or use by clients. Any final document must contain the seal/stamp, signature and date of signature of the licensee who prepared or directly supervised the work. For the purpose of this section*

> *"document" is defined as plans, specifications, plats, surveys, land descriptions as defined in WAC* ***332-130-020****, reports, and as-built documents prepared by the licensee. (2) Preliminary documents are those documents not considered final as defined herein, but are released or distributed by the licensee. Preliminary documents must be clearly identified as "preliminary" or contain such wording so it may be differentiated from a final document.* The fact is the TCA was "distributed for filing with public officials" for "final agency approvals".

When released to the public, the Tunnel Concept Assessment did not have a professional stamp. Whether that was for purposes of avoiding accountability, or an oversight, that action clearly violated Washington's licensing law and suggests negligence on the part of the IBR team.

The IBR Team Skirted Professional Licensing Laws.

It is the job of public agency staff and their consultants to inform the public and their elected officials. The IBR team has focused on influencing them, not informing them. In doing so, they have not only violated state licensing laws, but skirted those laws.

The success of the IBR project, like all complex public infrastructure projects depends upon the expertise and ethics of the professional engineers who the public relies upon for advice and opinions on technical matters. State licensing laws exist to provide a mechanism to ensure high professional standards. The public and their elected officials need to trust engineers. Those laws ensure the engineers do not betray that trust.

A key requirement of engineering licensing laws is that engineering reports be stamped by a professional engineer. If that report does have errors that do not reflect an acceptable standard of professional care, the engineer who stamped the report can be held accountable.

The value of these professional licensing laws is made very clear by the fact that IBR leadership falsely claimed that the ITT design option had a fatal flaw, when it did not. Unlike most of the false and misleading claims by the IBR team, this particular claim was addressed in an engineering report which had to be stamped by a professional engineer who could be held accountable. For that reason, the engineering report stated the truth about the fatal flaw false claim made by the IBR team, which totally contradicted the statements by IBR team members interfacing with the public.

The state licensing laws in Washington differ from those in Oregon in that preliminary documents containing engineering information are required to be stamped in Washington and not in Oregon. In Oregon, only final documents need be stamped. That is a flaw in Oregon licensing law because the preliminary documents are used in decision making for those complex projects that require the evaluation of design alternatives. That was exactly what occurred in the decision making process that led to the LPA – preliminary technical information led to the selection of the LPA.

The single technical document prepared to date that was stamped by a professional engineer is the Tunnel Concept Assessment. That document was only stamped after an informal complaint was made to the Washington State Board of Professional Engineers, whose efforts ultimately led

the IBR team to stamp the report.

The IBR team has released other technical documents to the public as can be seen on their website. Because they are technical documents, they should be stamped by a professional engineer, whether they are deemed preliminary or final. None are. The IBR team is negligent in not having them stamped.

Initially, the IBR team members resisted providing an engineering stamp to the Tunnel Concept Assessment. They will likely resist doing so for the other reports. Although Oregon does not have a requirement for providing a professional stamp to preliminary engineering documents, they do for final engineering documents. ODOT also has specific guidelines that address what technical documents need to be stamped by an engineering – TSP11-02d found at https://www.oregon.gov/odot/Engineering/Doc_TechnicalGuidance/TSB11-02d.pdf

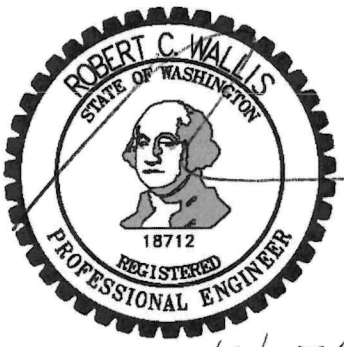
That ODOT guidance document makes it clear what technical documents require an engineering stamp. WSDOT does not appear to have specific guidance but does clearly require that preliminary documents be stamped: "Project Delivery Memo #21-02 – Applying Professional Stamps" accessible at https://wsdot.wa.gov/publications/fulltext/ProjectDev/ProjectDeliveryMemos/Memo21-02.pdf

Considering the fact that the IBR project is required to meet the laws in both Oregon and Washington, it is clear that all of the technical documents listed on the IBR website should be stamped. Given the fact that other aspects of the project besides the decision to reject the ITT design option are dependent upon technical documents to support those decisions, it is clear that they also should be listed as Technical Documents and stamped by a professional engineer. For instance, there are technical documents listed as "Program Fact Sheets" and "Financial Reports" that are clearly based upon engineering, and should be stamped by a professional engineer. None are, with the end result that the professional licensing laws are being skirted.

As mentioned above, professional engineers are held to professional standards that limit their ability to deceive without being held accountable. The IBR team has repeatedly made engineering claims which were alleged to reflect engineering opinions without providing any documentation that would support such opinions. In doing so, they skirted the professional licensing laws and avoided accountability for failure to comply with an acceptable standard of professional care.

A Civil Engineering Assessment of the Decision To Reject A Tunnel as an Option To Replace The I-5 Bridge Over the Columbia River

November 6, 2024



11/6/2024

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1. Introduction

The States of Oregon and Washington recently released a draft EIS for the proposed $7.5 billion project to replace the I-5 bridge across the Columbia River. That project, called the IBR (Interstate Bridge Replacement Program) is being implemented by a group of Oregon and Washington DOT staff and their consultants, herein called the IBR team.

An initial step in the EIS process was the evaluation of technical options to identify a preferred option for further refinement and environmental evaluation. A fixed bridge option was identified as the preferred option and the others were rejected, including the immersed tube tunnel (ITT) option.

Project critics have alleged that the IBR team deceived the public and elected officials when they provided false information regarding the deficiencies of the ITT design option which led to the rejection of that option. This report evaluates the validity of those allegations and their implications.

2. Conclusions

In evaluating the public record, it is concluded that:

1. During the process of screening design options to replace the existing I-5 bridge over the Columbia River, the public and their elected officials were deceived by the IBR team.

2. That deception was related to false and exaggerated claims regarding the deficiencies of the ITT option during the process of screening design options. One of the more significant false claims – that the ITT option would not enable connections to critical streets without significant out-of-direction travel – was in fact contradicted by IBR consulting engineers. That screening process completely lacks credibility.

3. By undermining the credibility of the process of screening design options, the credibility of the recently released draft EIS was also undermined. The process of screening alternatives should be repeated prior to finalizing the EIS.

4. The IBR team's leadership was negligent. They should be held accountable. If the screening process for the technical alternatives is repeated, which it should be, those involved in the previous screening process should not participate.

3. Background

The process of selecting a replacement of the I-5 bridge over the Columbia River began in the mid-1990's - with internal efforts by the ODOT staff to explore options. ODOT staff assumed that the replacement bridge would be a fixed bridge similar to the I-205 bridge except that it would include light rail.

Officially, that process began in 2005 when the Oregon and Washington DOTs were authorized to proceed with what became known as the Columbia River Crossing (CRC) project. Through that CRC process a fixed-bridge design option was selected and advanced through preliminary design and environmental assessment, leading to a final EIS prepared to meet the requirements of the National Environmental Policy Act (NEPA).

The CRC project was officially terminated 2014. The DOTs of both states continued efforts to implement a bridge replacement project. That effort, now named the Interstate Bridge Replacement Program (IBR) began in earnest in 2019. That project has moved forward through five basic decision making steps – all as mandated by NEPA due to the fact that the project was federally funded.

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The Bi-state Legislative Committee agreed to a project goal. In this case - the replacement of the existing bridge.

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potential deficiency was not identified for the fixed bridge option. Nor was it noted that the fixed bridge option could "potentially" present additional safety concerns related to the fact that, unlike the ITT design option, pedestrians and bicyclists will be exposed to weather conditions that would result in in slippery surfaces and that associated fall hazards would be increased by high winds.

The Alleged Deficiency Regarding Archaeological, Cultural and Environmental Impacts

The fact that more ground would be excavated with the ITT design option than with the fixed bridge option does mean that there are potentially more archeological impacts. It should be noted that there is no mention of the fact that just downriver from the proposed tunnel, Vancouver's Waterfront Development was constructed with significantly more excavation and site disturbance than would occur with the ITT design option construction. That vast amount of excavation did not have any archeological impacts or cultural impacts.

Nor does the IBR team mention the opportunities that the ITT option would provide for enhancement of cultural resource in the vast amount of open space created above the tunnel.

The IBR team members have emphasized the environmental impacts of dredging, without mentioning the fact that those impacts can be easily managed. The dredging required to install the ITT design option is in fact a small percentage of the dredging that occurs every year to maintain the Columbia River shipping channel.

The Alleged Deficiencies Regarding Cost Estimates

The IBR team stated that the ITT design option would cost twice as much as the fixed bridge option. That statement is very questionable.

The fact that when the IBR team initially provided a cost estimate, it appears to have been based upon three engineering errors that exaggerated costs. One was the assumption that the existing navigation channel would not be relocated for the ITT option. The second was the error made in assuming frontage roads would be required to access critical street connections. The third was an error in the estimated excavation quantities which significantly increased the cost estimate for the ITT design option. Both errors were brought to the attention of the IBR team. They failed to acknowledge the first two errors. They corrected the second but continued to claim that the ITT option was "twice the cost".

The error regarding the ITT option's inability to connect to critical streets is discussed in the previous section. The error in excavation quantities was acknowledged by the IBR team, and thus does not require addressing. The error regarding the navigation channel relocation is discussed in the following subsection.

The Error Regarding The Navigation Channel Location Assumption

The IBR team assumed that the main navigation channel would be relocated for the fixed-bridge option, but not the ITT option. In doing so, the depth, cost, and construction challenges of the ITT option were all exaggerated.

The Tunnel Concept Assessment report included a vertical alignment that was significantly deeper than need be as the result of the failure to assume the main navigation channel would be relocated from its existing location near the north bank of the Columbia to the center of the river. To make that assumption suggests negligence. To understand this please note:

1. As shown on Figure 3 from the Tunnel Concept Assessment (available for review on the IBR project website under "Technical Documents"), there are currently three navigation channels crossing the potential alignments of the tunnel, with the Primary Channel being located within close proximity to the north bank of the Columbia River under the lift-span of the bridge. In addition, there are two barge channels located under the two highest spans of the existing bridge to the south.

2. As shown on Figure 4 from the Tunnel Concept Assessment, the low point of the tunnel was assumed to be below the Primary Channel near the north bank of the Columbia. With the assumption that the Primary Channel will not be relocated, the low point of the tunnel is at approximate 100 feet below the north bank of the river.

3. If a tunnel were to be constructed, regardless of its depth, it is logical to assume that the three channels would be combined into a single channel in the middle of the river. That navigation channel is currently maintained through the entire length of the Columbia from its mouth to Vancouver, except at bridges, where several smaller channels are needed to avoid bridge piers.

4. A credible conceptual tunnel conceptual design would have assumed that the channel would be relocated to the center of the river. Doing so would have put the low-point of the tunnel near the center of the river instead of near the north bank. By sloping the tunnel up from the center of the river to the river banks, the tunnel would be much higher in elevation at its bank and inland. Instead of the tunnel being 90 feet deep at the bank as was assumed in the flawed DOT conceptual design, it would be about 50 feet deep.

In short, by failing to assume the Primary Channel would be relocated to the center of the river, which would be a logical assumption, the tunnel was conceptually designed to be much deeper than necessary where it touches upon land on both sides of the river.

5. The Impact of the Deception Upon the Draft EIS

The draft EIS was prepared assuming the initial screening process was credible, which it was not. That EIS addresses only the fixed bridge option. Without a credible alternative screening process, the draft EIS is not credible.

The process of screening design options resulted in the selection of a locally preferred alternative (LPA). The selection of the LPA was a foundational decision that established the design option upon which the EIS was based. In essence, the draft EIS was prepared based upon a decision that was the end result of deception by the IBR team.

The screening process needs to be repeated without the deception that dominated the process that

resulted in the draft EIS. Those on the IBR team involved in that screening process should not be involved in a repeat of that process. They completely lack credibility.

6. Why IBR Leadership Should Be Held Accountable for Negligence

Negligence is the failure to behave with the level of care that a reasonable person would have exercised under the same circumstances.

It is clear that the process of screening design options and selected a locally preferred alternative was not managed by the IBR team to an acceptable standard of care. They were clearly negligent because they:

1. Claimed ITT deficiencies that did not exist, and exaggerated others.
2. Provided a single engineering evaluation which contained significant errors and not only confused the public, but IBR leadership as well.
3. Violated state professional licensing laws.
4. Skirted those professional licensing laws to avoid accountability for deceiving the public with false engineering information

These acts of negligence are discussed in the following paragraphs.

Exaggeration of Deficiencies

The IBR leadership was negligent in claiming deficiencies when they did not exist, and exaggerating others. That matter is discussed in Section 5 above.

The Deficiencies in the Tunnel Concept Assessment

As mentioned above, of the Tunnel Concept Assessment contradicted what the public was told by the IBR team leadership. Apparently, IBR team leadership were unable to understand the Tunnel Concept Assessment. That suggests that the report was seriously flawed. The IBR team leadership was negligent in not providing the public with an engineering evaluation and report which provided the engineering information that was critical to the success of the public's decision-making process.

The Tunnel Assessment Report Violated Washington State Licensing Laws

Washington State has well-written laws that govern the practice of engineering and the requirements for stamping engineering documents. There are good reasons for those laws, further discussed below. Washington Administrative Code (WAC) WAC 196-23-020 states:

Seal/stamp usage.

> *"The use of the seal/stamp must be in accordance with chapter **18.43** RCW or as otherwise described herein:*
>
> *(1) Final documents are those documents that are prepared and distributed for filing with public officials, use for construction, final agency approvals or use by clients. Any final document must contain the seal/stamp, signature and date of signature of the licensee who prepared or directly supervised the work. For the purpose of this section*

> *"document" is defined as plans, specifications, plats, surveys, land descriptions as defined in WAC* ***332-130-020****, reports, and as-built documents prepared by the licensee. (2) Preliminary documents are those documents not considered final as defined herein, but are released or distributed by the licensee. Preliminary documents must be clearly identified as "preliminary" or contain such wording so it may be differentiated from a final document.* The fact is the TCA was "distributed for filing with public officials" for "final agency approvals".

When released to the public, the Tunnel Concept Assessment did not have a professional stamp. Whether that was for purposes of avoiding accountability, or an oversight, that action clearly violated Washington's licensing law and suggests negligence on the part of the IBR team.

The IBR Team Skirted Professional Licensing Laws.

It is the job of public agency staff and their consultants to inform the public and their elected officials. The IBR team has focused on influencing them, not informing them. In doing so, they have not only violated state licensing laws, but skirted those laws.

The success of the IBR project, like all complex public infrastructure projects depends upon the expertise and ethics of the professional engineers who the public relies upon for advice and opinions on technical matters. State licensing laws exist to provide a mechanism to ensure high professional standards. The public and their elected officials need to trust engineers. Those laws ensure the engineers do not betray that trust.

A key requirement of engineering licensing laws is that engineering reports be stamped by a professional engineer. If that report does have errors that do not reflect an acceptable standard of professional care, the engineer who stamped the report can be held accountable.

The value of these professional licensing laws is made very clear by the fact that IBR leadership falsely claimed that the ITT design option had a fatal flaw, when it did not. Unlike most of the false and misleading claims by the IBR team, this particular claim was addressed in an engineering report which had to be stamped by a professional engineer who could be held accountable. For that reason, the engineering report stated the truth about the fatal flaw false claim made by the IBR team, which totally contradicted the statements by IBR team members interfacing with the public.

The state licensing laws in Washington differ from those in Oregon in that preliminary documents containing engineering information are required to be stamped in Washington and not in Oregon. In Oregon, only final documents need be stamped. That is a flaw in Oregon licensing law because the preliminary documents are used in decision making for those complex projects that require the evaluation of design alternatives. That was exactly what occurred in the decision making process that led to the LPA – preliminary technical information led to the selection of the LPA.

The single technical document prepared to date that was stamped by a professional engineer is the Tunnel Concept Assessment. That document was only stamped after an informal complaint was made to the Washington State Board of Professional Engineers, whose efforts ultimately led

the IBR team to stamp the report.

The IBR team has released other technical documents to the public as can be seen on their website. Because they are technical documents, they should be stamped by a professional engineer, whether they are deemed preliminary or final. None are. The IBR team is negligent in not having them stamped.

Initially, the IBR team members resisted providing an engineering stamp to the Tunnel Concept Assessment. They will likely resist doing so for the other reports. Although Oregon does not have a requirement for providing a professional stamp to preliminary engineering documents, they do for final engineering documents. ODOT also has specific guidelines that address what technical documents need to be stamped by an engineering – TSP11-02d found at https://www.oregon.gov/odot/Engineering/Doc_TechnicalGuidance/TSB11-02d.pdf

That ODOT guidance document makes it clear what technical documents require an engineering stamp. WSDOT does not appear to have specific guidance but does clearly require that preliminary documents be stamped: "Project Delivery Memo #21-02 – Applying Professional Stamps" accessible at https://wsdot.wa.gov/publications/fulltext/ProjectDev/ProjectDeliveryMemos/Memo21-02.pdf

Considering the fact that the IBR project is required to meet the laws in both Oregon and Washington, it is clear that all of the technical documents listed on the IBR website should be stamped. Given the fact that other aspects of the project besides the decision to reject the ITT design option are dependent upon technical documents to support those decisions, it is clear that they also should be listed as Technical Documents and stamped by a professional engineer. For instance, there are technical documents listed as "Program Fact Sheets" and "Financial Reports" that are clearly based upon engineering, and should be stamped by a professional engineer. None are, with the end result that the professional licensing laws are being skirted.

As mentioned above, professional engineers are held to professional standards that limit their ability to deceive without being held accountable. The IBR team has repeatedly made engineering claims which were alleged to reflect engineering opinions without providing any documentation that would support such opinions. In doing so, they skirted the professional licensing laws and avoided accountability for failure to comply with an acceptable standard of professional care.

IBR Draft SEIS - RECORD #2478 DETAIL

First Name :	LAURA
Last Name :	MILLER
Attachments :	DSEIS-2478_Miller_Original.pdf (200 kb) Marine_Drive_Bike_Lanes_Laura Miller.pdf (198 kb)

IBR Draft SEIS - RECORD #2478 DETAIL

Submission Date :	11/15/2024
First Name :	LAURA
Last Name :	MILLER
Business/Organization/Agency :	
Attachments :	Marine_Drive_Bike_Lanes_Laura Miller.pdf (198 kb)

Submission Input :

So many things to consider. Almost an over-whelming project. We moved here almost twelve years ago. All the research, planning, etc., for a new bridge was scraped. Such a waste of money.

The US Coast Guard should be priority one, along with PDX airport. If you cannot get these folks around a table to come to an agreement, you might as well go home.

I live in the Bridgeton neighborhood. Lucky me, right? Our neighborhood association was diligent enough to take the time to think out all the concerns for us. I submit to you in separate emails every document that covers the suggestion and concerns.

* Looks matter. Do not build an ugly bridge.
* Bikes and freight are not friends.
* 40-Mile loop must be well thought out; the pride of our bike riding state.
* Build a bridge that considers multiuse paths
* MLK on ramp must be better, way better than what we have now.

Thank you,

Laura Miller

[redacted]

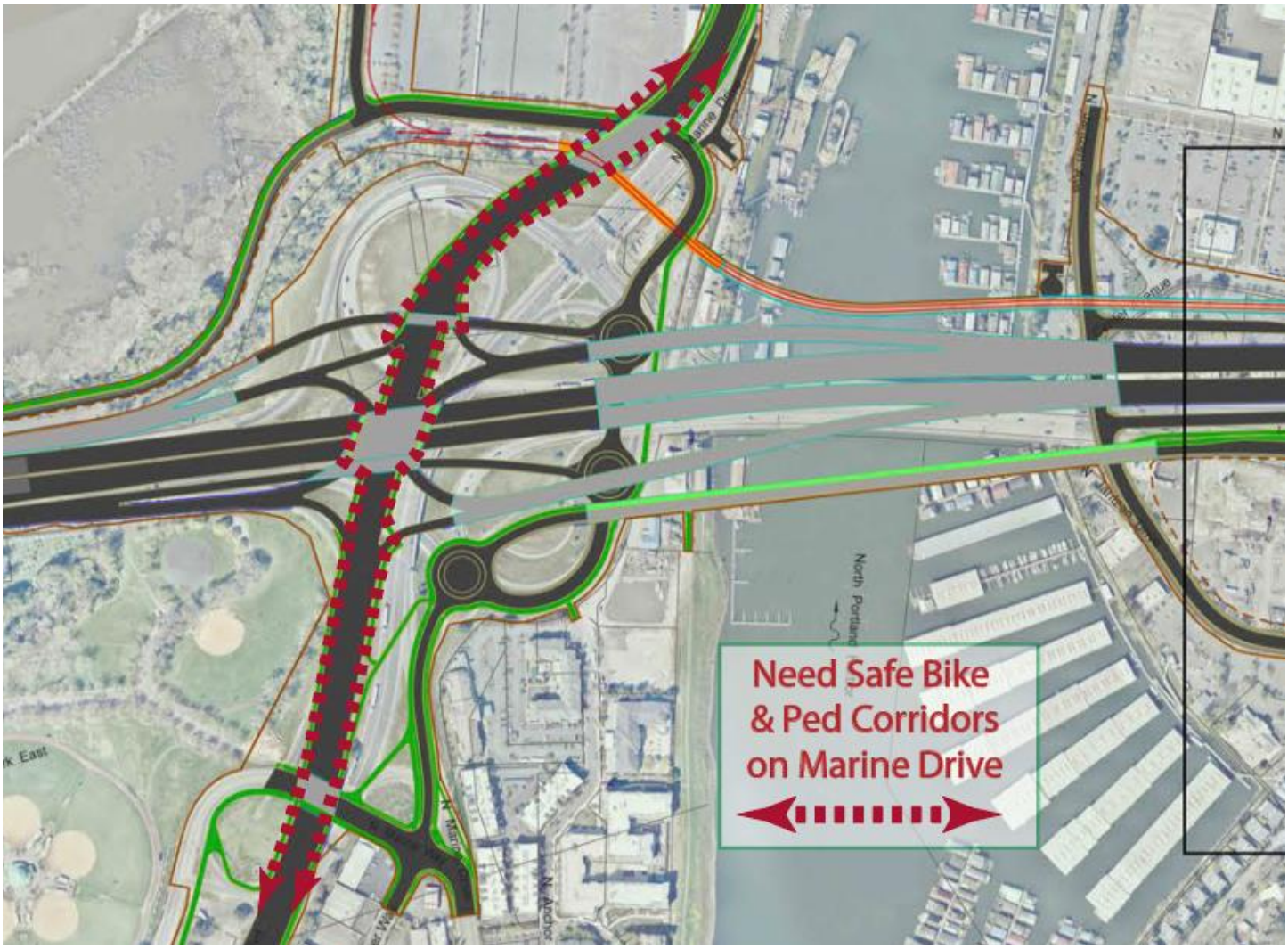
[redacted]

[redacted]

Comments on Freight and Bike conflicts on the Marine Drive Single Point Interchange

The IBR proposed design for Bike lanes through the Marine Drive Single Point Interchange presents a major conflict between bike and Freight movements. As the Marine Drive interchange is considered to be one of the most important Freight Interchanges in the State of Oregon, we request that these pathways for active transportation be built separated from Freight movements to provide safe passage for active transportartion users.

This meets the purpose and needs of the IBR to (b) improve connectivity, reliability, travel times, and operations of public transportation modal alternatives in the Program area and(c) improve highway freight mobility and address interstate travel and commerce needs in the Program area.



Please study how these corridors could be built separated from the vehicle travel lanes using barriers or raised active transportation path ways. In addition, the IBR should study how to use the new technologies of sensors that detect active transportation user approaching intersections crossings. These advanced sensors triggers traffic signals, so that users crossing through many these intersections does not have to individually press a button at each crossing and wait for the signal to change one crossing at a time.

Thank you! Laura Miller

[redacted]

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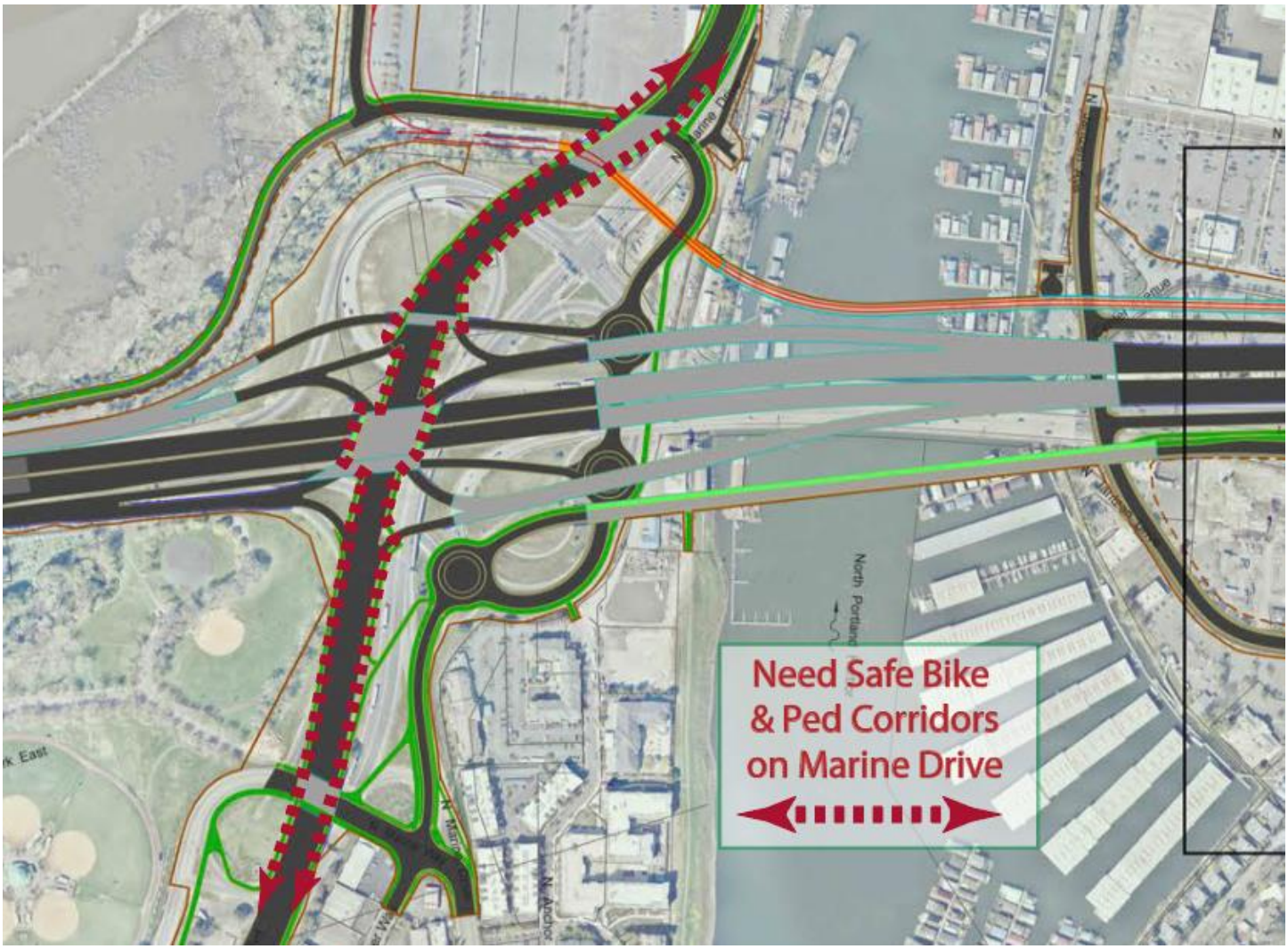

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Thank you! Laura Miller
424 N. Bridgeton Road
Portland, OR 97217

IBR Draft SEIS - RECORD #2479 DETAIL

First Name :	LAURA
Last Name :	MILLER
Attachments :	DSEIS-2479_Miller_Original.pdf (409 kb) The_40_Mile_Loop_Connections_Laura Miller.pdf (408 kb)

IBR Draft SEIS - RECORD #2479 DETAIL

Submission Date :	11/15/2024
First Name :	LAURA
Last Name :	MILLER
Business/Organization/Agency :	
Attachments :	The_40_Mile_Loop_Connections_Laura Miller.pdf (408 kb)

Submission Input :

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Thank you,

Laura Miller

[redacted]

[redacted]

[redacted]

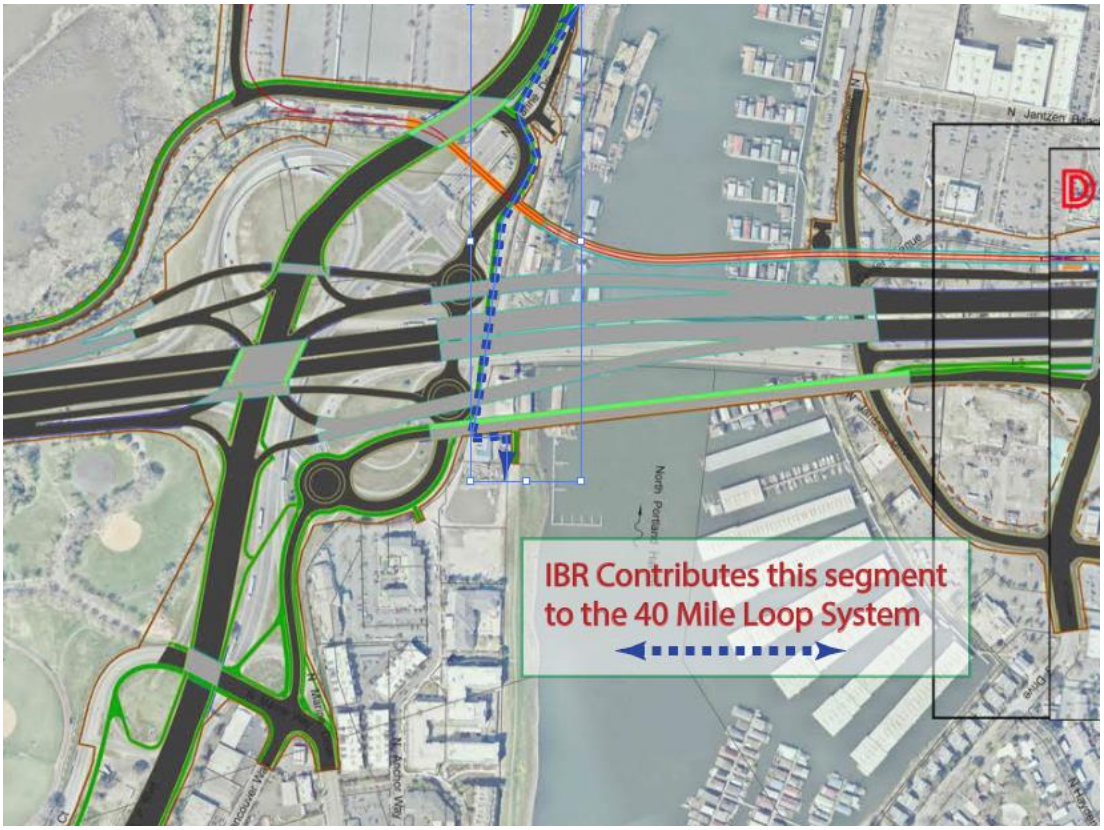
Comments on IBR Multi-Use path connections
to the 40-Mile Loop East/West Corridor

The 40-Mile Loop is a comprehensive regional trail system forming a central Hub that connects nearly all other regional trails and parks within Multnomah County. The Loop alignment, which has been planned and incorporated into regional land use frameworks for over 40 years. While the trail alignment for the 40-Mile Loop has long been established, certain easements remain unacquired, and some portions of the trail are yet to be constructed.

The adopted alignment of the 40-Mile Loop passes through the area impacted by the Interstate Bridge Replacement (IBR) project. While the IBR project provides several benefits to the 40-Mile Loop, we believe additional study is warranted to make the proposed trails safer and more usable.

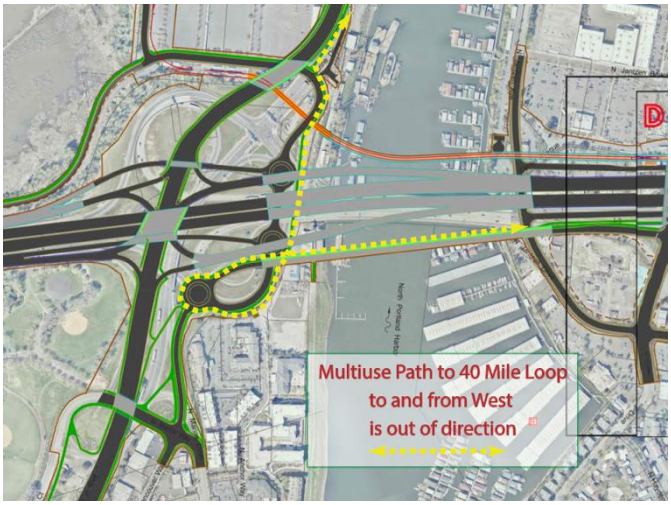
IBR Positive Contributions to the 40-Mile Loop Trail

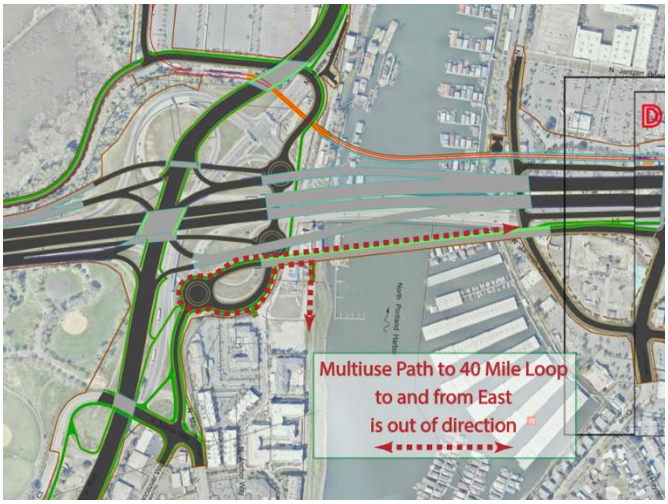
The IBR project will construct the segment of the 40-Mile Loop within the project area. This new trail segment will provide a safe, separated trail connecting the existing 40-Mile Loop trail located west of the proposed bridges through the project area, under the many new IBR bridges emanating from mainland Portland. After crossing under the local Harbor Bridge, the east most bridge proposed, the IBR will stub out the Trail to the East for a future connection to the Bridgeton Trails segment of the 40 Mile Loop. This is a good trail addition to the 40 Mile Loop and appreciated by the 40 Mile Loop Land Trust board.



Concerns with the Proposed Connection of 40 Mile Loop to the multiuse path on the local Harbor Bridge.

However, the proposed trail connections from the multiuse path on the local Harbor Bridge to the new 40-Mile Loop segment is not optimal. The proposed design requires users to travel out of their way, navigating a traffic circle and crossing vehicle lanes to reach both the eastbound and the westbound trail connection. This routing is neither convenient nor efficient and could discourage its use.





Request for Further Study of better East and West Connections to the 40 Mile Loop

We strongly recommend that alternative design options be considered to provide a more direct, connection to and from the east and west to the local Harbor Bridge multiuse path.

Possible additional study include:

1) Creating a direct connection from the East stub of the Bridgeton Trail to the sidewalk on the east side of the local Harbor Bridge. This direct connection would make it easier and more appealing for cyclists and pedestrians to cross the Harbor Bridge, while also offering a scenic route with views of North Portland Harbor and Mt Hood.
2) Additionally, we request that the sidewalk on the east side of the local Harbor Bridge be designed to be as wide as possible, with areas to rest and enjoy the views, further enhancing the experience for users.
3) Study more direct trail connections from the local Harbor Bridge multi use path to both the east and the west that do not involve routes around the Marine Drive traffic circles and crossing travel lanes.
4) Study routing the IBR entire multiuse path on the west side of the bridges rather than the east side. If the multiuse path was located on the light rail bridge on the west side, the east and west connection would be straight forward and direct. The west side multi use path is discussed more in a separate comment.
5) Lastly, we have a separate comment on ways the IBR could facilitate more just a stub for the east side connection to the Bridgeton Trail segment of the 40 Mile Loop.

Thank you! Laura Miller [redacted]

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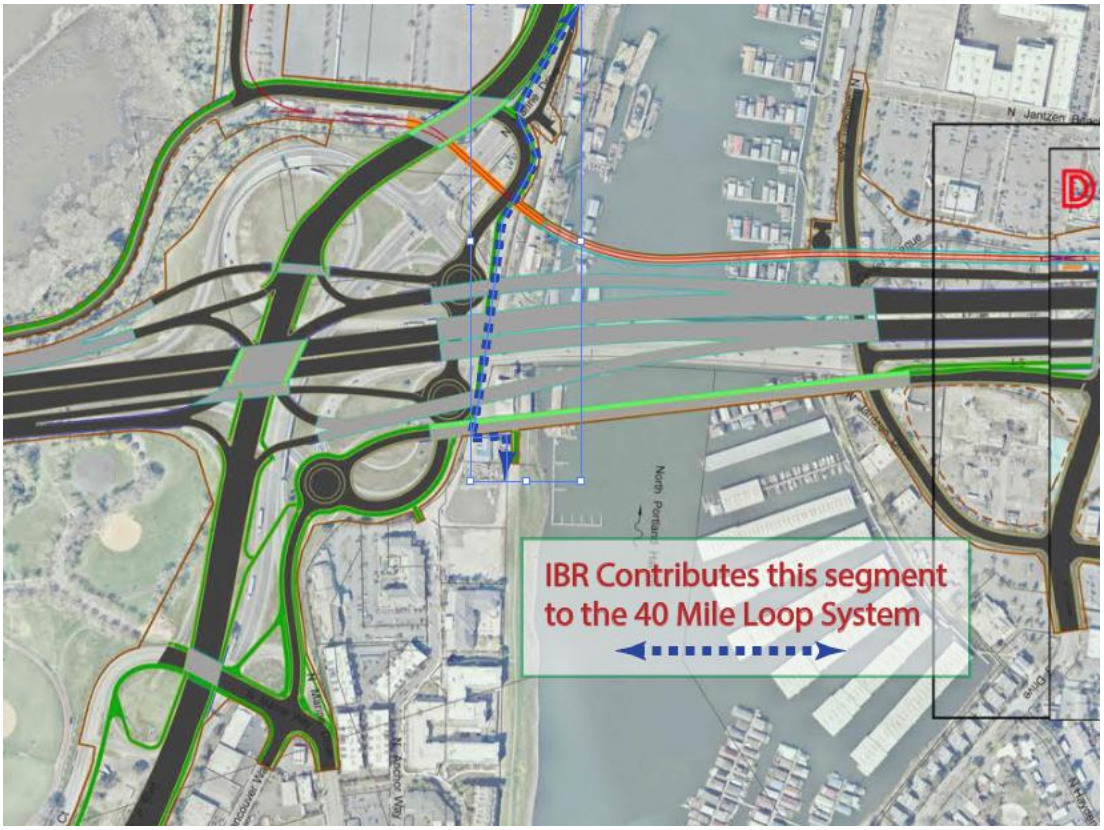

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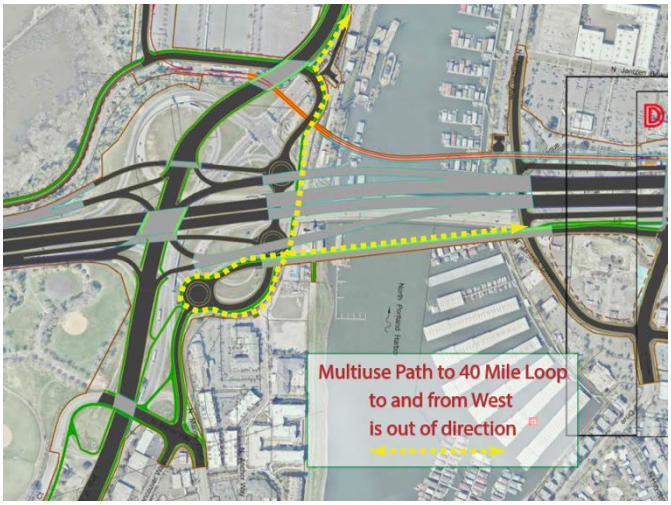

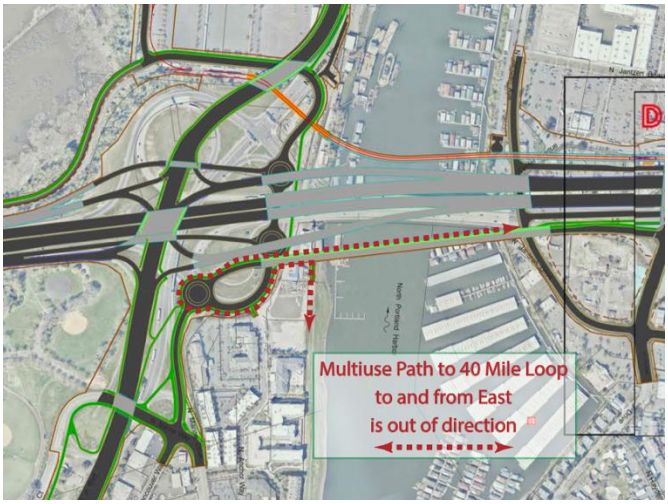

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Thank you! Laura Miller 424 N. Bridgeton Road Portland, OR 97217

IBR Draft SEIS - RECORD #2480 DETAIL

First Name :	Benjamin
Last Name :	Platt
Attachments :	DSEIS2480_Platt_Original.pdf (4 kb)

IBR Draft SEIS - RECORD #2480 DETAIL

Submission Date : 11/15/2024
First Name : Benjamin
Last Name : Platt
Business/Organization/Agency :

Submission Input :

First Name:
Benjamin
Last Name:
Platt
Email:
[redacted]
City:
[redacted]
US States:
[redacted]
Zip:
[redacted]
Topic Area:
Climate Change
Comment:
Hello,
I am deeply concerned about the ballooning costs and scope of the IBR plan, as well as it's potential negative impacts on our climate and environment. Seismic stability is absolutely important and overdue, but expanding the roads and lanes on this project serves only to pollute our air, increase our greenhouse gas emissions, and waste increasing amounts of taxpayer money while not actually reducing congestion. Traffic modeling must realistically account for induced demand to ensure accurate projects for the road usage.
We need to future-proof the bridge for greater public transit capacity so this future-facing infrastructure can actually meet the demands of the future the climate crisis demands of us (which involves more public transit and active transportation and way fewer cars).
If safety is the concern of the IBR, we should think not only about the safety of our community in the case of a seismic event, but also about their ongoing and future health and safety; we need safe active transportation, reduced car travel, expanded public transportation, and overall reduced greenhouse gas emissions and air pollutants.
Thank you for your consideration.
JCA comment #: 441

IBR Draft SEIS - RECORD #2482 DETAIL

First Name :	LAURA
Last Name :	MILLER
Attachments :	DSEIS-2482_Miller_Original.pdf (411 kb) Separating_Freight__Bike_Travel_Laura Miller.pdf (410 kb)

IBR Draft SEIS - RECORD #2482 DETAIL

Submission Date :	11/15/2024
First Name :	LAURA
Last Name :	MILLER
Business/Organization/Agency :	
Attachments :	Separating_Freight__Bike_Travel_Laura Miller.pdf (410 kb)

Submission Input :

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Thank you,

Laura Miller

[redacted]

[redacted]

[redacted]

Separating Freight and Bike Travel
on the Marine Drive Interchange and On-Ramps

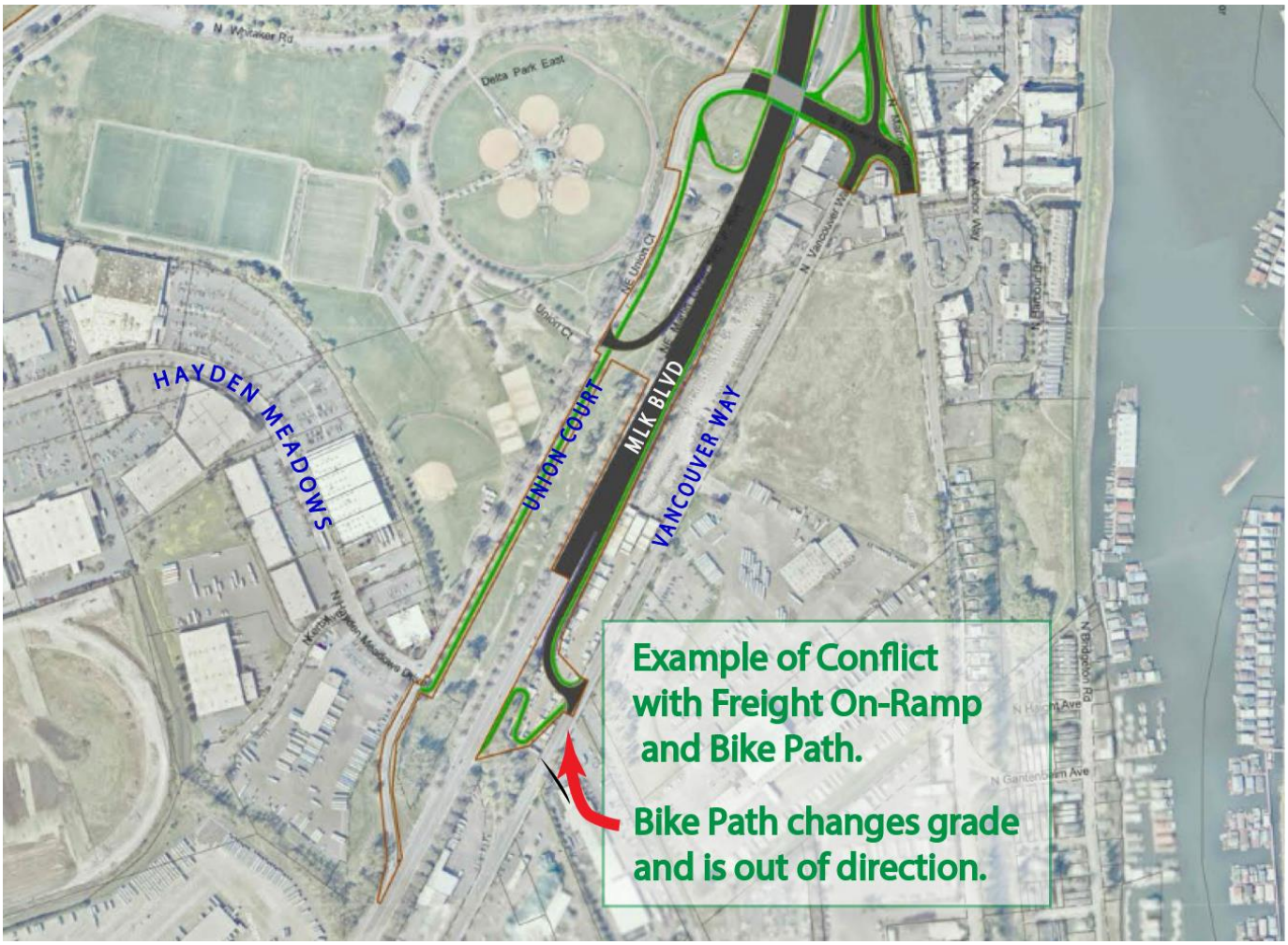
One important purpose and need of the IBR is to (c) improve highway freight mobility and address interstate travel and commerce needs in the Program area.

Another important purpose and need is to (b) improve connectivity, reliability, travel times, and operations of public transportation modal alternatives in the Program area.

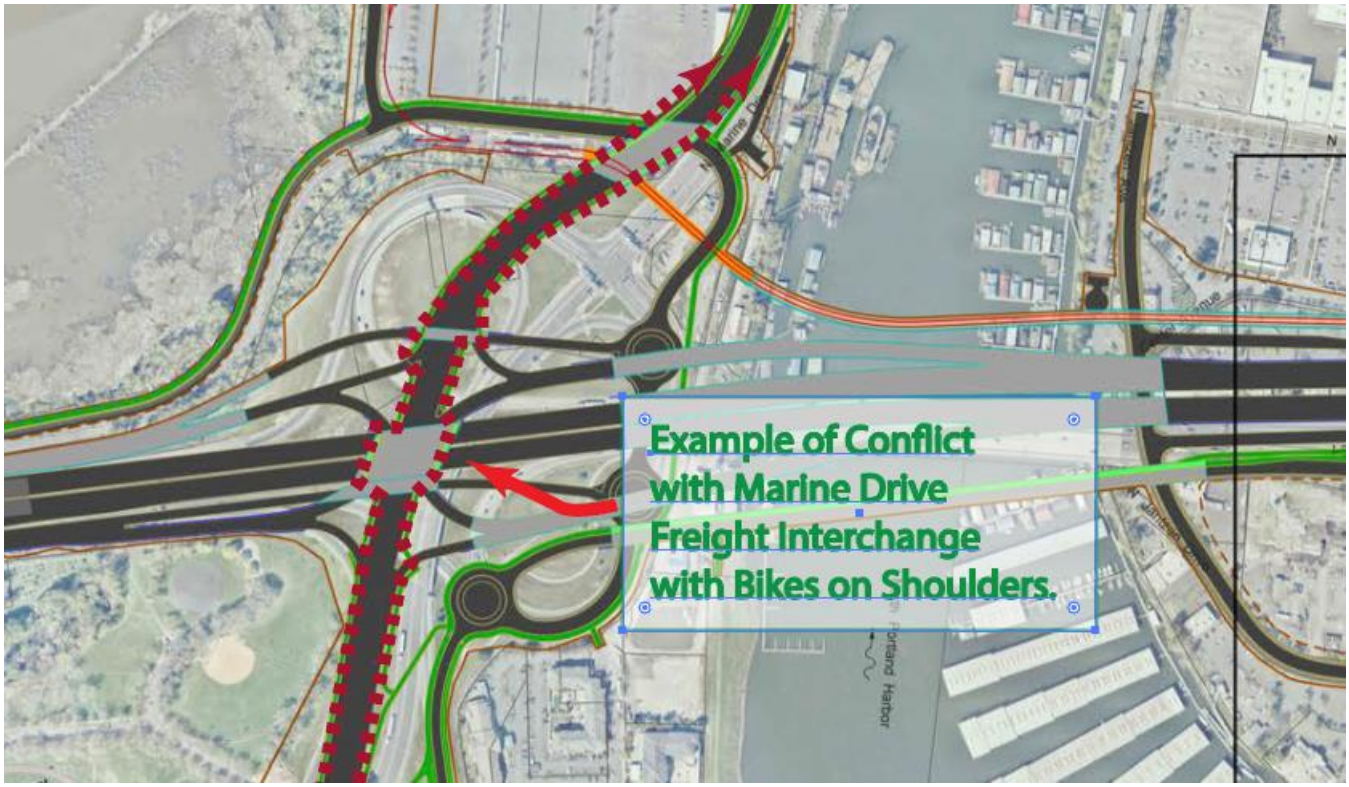
A way to meet the purpose and needs of both Freight Users and Active Transportation Users is to build active transportation routes physically separated from Freight routes as much as possible. Maximizing this separation is key to creating efficient Freight routes while creating safer, more attractive, and therefore more heavily used walking, rolling, and biking routes.

Examples of Conflicts between Freight and Active Transportation users.

The proposed IBR design for the ramp from Vancouver Way to MLK North poses significant conflict between Freight and Bikes, as the proposed Bike route travels changes grade along a switch back, crosses a major Freight intersection and climbs a grade up along a freight-heavy on-ramp.



Another example of possible Freight-Bike conflict is in the Marine Drive Interchange. Here IBR proposes to build a complete bike lanes and pedestrian sidewalk on both sides of the Interchange.



Even if the IBR is required by State Law to provide bike and pedestrian facilities on the Marine Drive interchange, we recommend additional study on improving two aspects of these improvements:

1) Any facilities for bike and ped that must be built on Marine Drive needs to be built in a way that separates bike and ped travel from Freight as much as possible using techniques such as barriers, and raised bike roadways.

2) To discourage any active transportation users from crossing the Marine Drive interchange, also build alternative routes that go around the Marine Drive Interchange rather than through the interchange. This separate bike ped system needs be so well design that it becomes the preferred route. Current IBR design has the MLK active user connection provided partially along MLK shoulders and partially on separated trails. To become the preferred route, an active transportation route that is not reliant of MLK shoulders need to be developed. This separated preferred corridor needs to conveniently link to each of the existing regional bike corridors.

Complete separation creates safety for both the people that are walking, biking and rolling in this area, but also makes it safer and more efficient for Freight Users who don't have to worry about negotiating on ramps with curves and with grade changes while watching out for bike users traveling the exact same routes.

This separation better meets 3 parts of the purpose and needs statement of the IBR; (a) improve travel safety and traffic operations on the I-5 river crossing and associated interchanges; (b) improve connectivity, reliability,

travel times, and operations of public transportation modal alternatives in the Program area; (c) improve highway freight mobility and address interstate travel and commerce needs in the Program area.

Given the Marine Drive interchange is usually described as the **most heavily used Freight corridor in Oregon**, we encourage the IBR to work with the Active Transportation Users in combination with the Freight Users **together rather than separately** to refine designs that efficiently moves Freight Users through the Marine Drive Interchange and Active Transportation Users around the Interchange.

Thank you!

Laura Miller
[redacted]
[redacted]

Separating Freight and Bike Travel
on the Marine Drive Interchange and On-Ramps

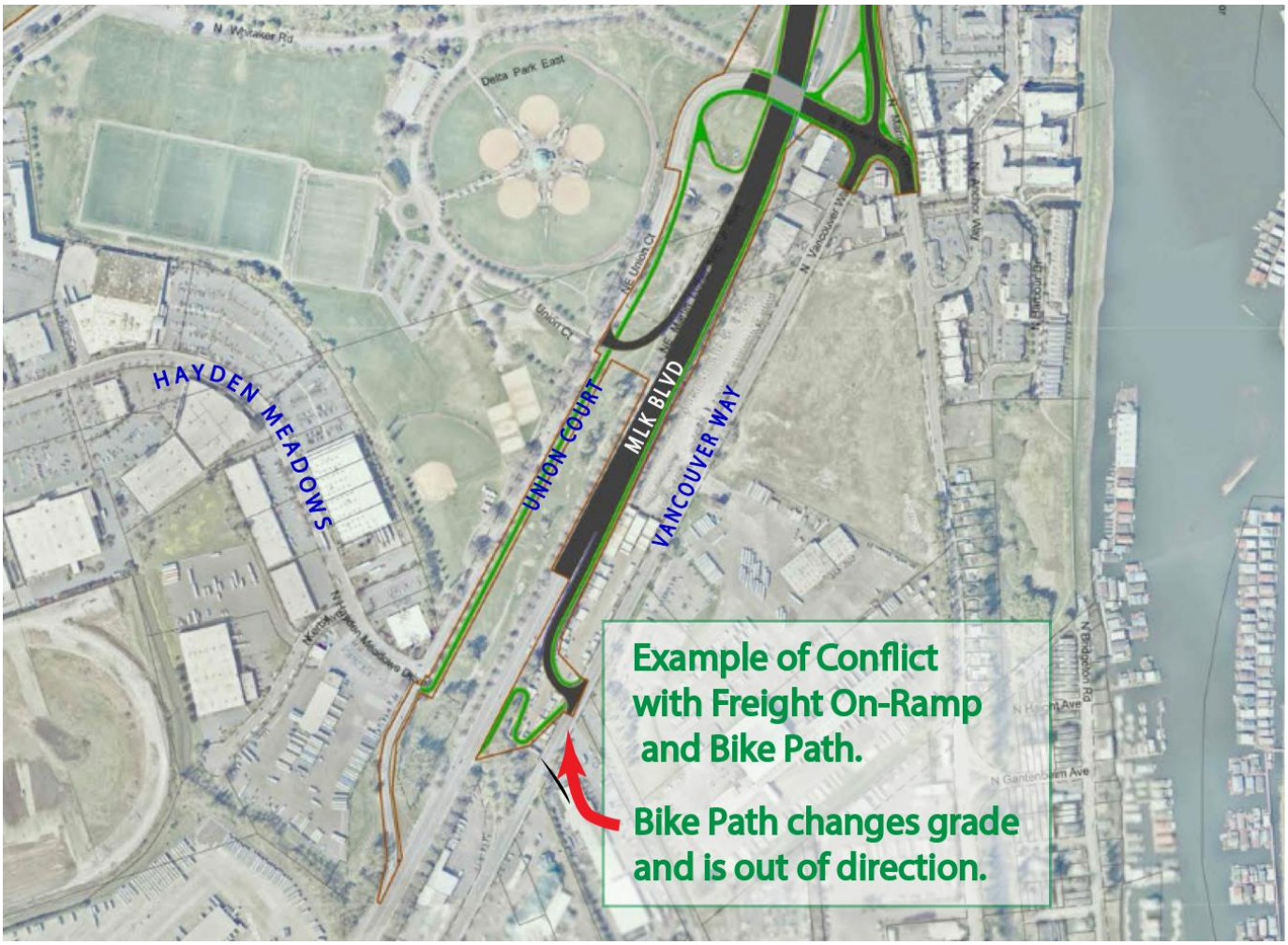
One important purpose and need of the IBR is to (c) improve highway freight mobility and address interstate travel and commerce needs in the Program area.

Another important purpose and need is to (b) improve connectivity, reliability, travel times, and operations of public transportation modal alternatives in the Program area.

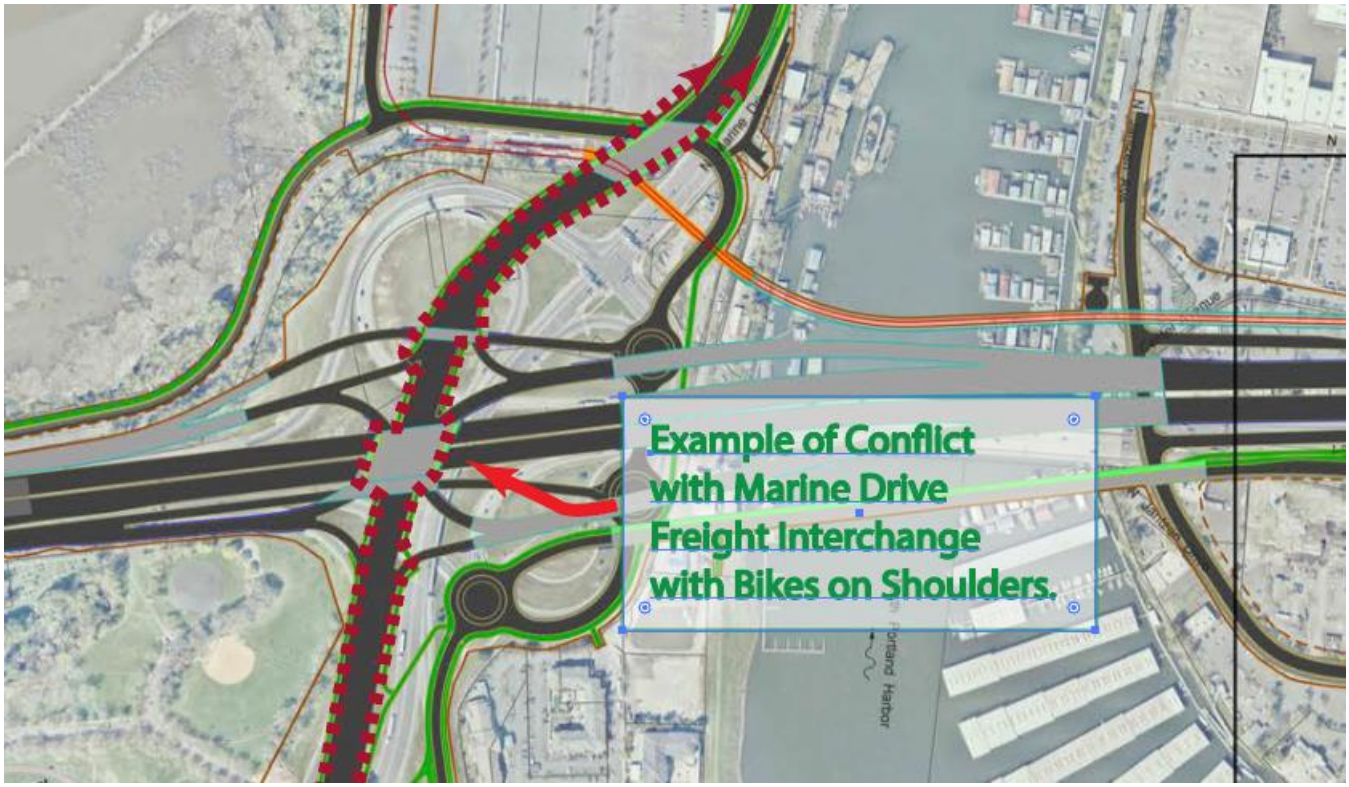
A way to meet the purpose and needs of both Freight Users and Active Transportation Users is to build active transportation routes physically separated from Freight routes as much as possible. Maximizing this separation is key to creating efficient Freight routes while creating safer, more attractive, and therefore more heavily used walking, rolling, and biking routes.

Examples of Conflicts between Freight and Active Transportation users.

The proposed IBR design for the ramp from Vancouver Way to MLK North poses significant conflict between Freight and Bikes, as the proposed Bike route travels changes grade along a switch back, crosses a major Freight intersection and climbs a grade up along a freight-heavy on-ramp.



Another example of possible Freight-Bike conflict is in the Marine Drive Interchange. Here IBR proposes to build a complete bike lanes and pedestrian sidewalk on both sides of the Interchange.



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Thank you!

Laura Miller
424 N. Bridgeton Road
Portland, OR 97217

IBR Draft SEIS - RECORD #2483 DETAIL

First Name :	LAURA
Last Name :	MILLER
Attachments :	DSEIS-2483_Miller_Original.pdf (150 kb) Comments_Bridge_Architecture_Laura Miller.pdf (148 kb)

IBR Draft SEIS - RECORD #2483 DETAIL

Submission Date :	11/15/2024
First Name :	LAURA
Last Name :	MILLER
Business/Organization/Agency :	
Attachments :	Comments_Bridge_Architecture_Laura Miller.pdf (148 kb)

Submission Input :

So many things to consider. Almost an over-whelming project. We moved here almost twelve years ago. All the research, planning, etc., for a new bridge was scraped. Such a waste of money.

The US Coast Guard should be priority one, along with PDX airport. If you cannot get these folks around a table to come to an agreement, you might as well go home.

I live in the Bridgeton neighborhood. Lucky me, right? Our neighborhood association was diligent enough to take the time to think out all the concerns for us. I submit to you in separate emails every document that covers the suggestion and concerns.

* Looks matter. Do not build an ugly bridge.
* Bikes and freight are not friends.
* 40-Mile loop must be well thought out; the pride of our bike riding state.
* Build a bridge that considers multiuse paths
* MLK on ramp must be better, way better than what we have now.

Thank you,

Laura Miller

[redacted]

[redacted]

[redacted]

Comments on the Importance of the
Architectural Design of the new Bridges.

Once the project decides whether the main bridges are going to be a single level bridges, stack style bridges or lift style bridges, the IBR project will develop the aesthetic characteristics of the final Bridges.

We request that once the bridge configuration is determined the IBR will hold a public process on the final architectural design of not only the main bridges but the entire bridge corridor. This process could be modeled after similar processes that Portland has done in the past for Tilikum Crossing and the new Burnside Bridge. Both of these processes were led by National Design Experts in collaboration with Local Design Experts, the project engineers and members of the public to recommend a final bridge architecture to the region's leaders.

We believe the aesthetics of these bridges matter, and that they are an important inspiration that helps move the project forward. The architectural style of the bridges creates a gateway to both Oregon and Washington. The view of the bridges from the Vancouver shoreline and Hayden Island are important to the future developments in those areas.

Should the IBR select the stack bridges as the best option, that bridge structure, even though it is a basic truss, can be executed with finesse. Remember the bridges crossing North Portland Harbor could have architectural significance as well. Imagine driving over the Harbor between twin cable-stayed bridges on each side, one beautiful structure holding up the light rail bridge, and its twin holding up the local Harbor bridge.

Even a flat bridge can have architectural significance. How the constraints of the project are resolved in the hands of a talented Bridge Architect become the Bridge's unique beauty.

The region is investing a lot into these bridges that will be part of our environment for a long time. Let's build something we are proud to leave to our children and our children's children.

Thank you!

Laura Miller
[redacted]

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Architectural Design of the new Bridges.

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Thank you!

Laura Miller
424 N. Bridgeton Road
Portland, OR 97217

IBR Draft SEIS - RECORD #2484 DETAIL

First Name :	Virginia
Last Name :	Feldman
Attachments :	DSEIS2484_Feldman_Original.pdf (5 kb)

IBR Draft SEIS - RECORD #2484 DETAIL

Submission Date : 11/15/2024
First Name : Virginia
Last Name : Feldman
Business/Organization/Agency :

Submission Input :

First Name:
virginia
Last Name:
feldman
Business or Organization:
physician
Email:
[redacted]
Phone:
[redacted]
City:
[redacted]
US States:
[redacted]
Zip:
[redacted]
Topic Area:
Transportation
Comment:
As a physician, I am most concerned about the health issues of the Interstate Bridge Replacement. I worked in north Portland for 35 years, & many of my patients/families still live there: they will be impacted. Because of the unreliability of the current traffic modeling of air quality & safety, we really must get a new & more realistic Supplemental Environmental Impact Statement. Because more traffic, without creating more non-fossil fuel powered public transportation, will worsen so many aspects of human health--from lung disease to heart attacks & strokes, to cancer--yes, even cancers are increased around polluted areas. And, finally, marginalized communities are usually closer to all these pollutants from more cars & bigger bridges--further aggravating health inequities..

thank you, Dr. Virginia Feldman MD, FAAP
JCA comment #: 440

IBR Draft SEIS - RECORD #2485 DETAIL

First Name :	Jeff
Last Name :	Owen
Attachments :	DSEIS_2485_ClackamasCounty_Original.pdf (2 kb)

IBR Draft SEIS - RECORD #2485 DETAIL

Submission Date : 11/15/2024
First Name : Jeff
Last Name : Owen
Business/Organization/Agency :

Submission Input :

Hello,

Thank you for the chance to review, discuss, and comment on the Interstate Bridge Replacement (IBR) program Draft SEIS and the important work underway in our region with members of the program's technical project team. Please find below a few concerns and requests from our team:

* Near-term forecast not available: We are concerned that tolling the existing I-5 Interstate Bridge prior to delivering the full program of multimodal options could result in substantial levels of diversion from I-5 to I-205. We have reviewed the draft SEIS and did not see any analysis of a near-term forecast showing traffic patterns during pre-completion tolling or during construction impacts. We request that you provide this near-term analysis as part of the SEIS.
* I-205 Abernethy Bridge Tolling Assumptions: Traffic forecasting within the SEIS assumes that the I-205 Abernethy Bridge will be tolled. However, due to the Governor's actions in spring of 2024, it does not appear that the forecasting is currently in-line with the pause on tolling related to the I-205 Abernethy Bridge. We request that you provide data to show the traffic forecast if the Abernethy Bridge and I-205 remain untolled.
* Transit Financing Not Yet Secured: The travel forecasting assumes completion of new transit connections and increased service levels to absorb a large growth in transit person trips across the river. FTA Capital Investment Grant (CIG) funds have historically been the last funds secured. As such, there remains a risk in securing CIG funds to pay for the extension of light rail into Vancouver that the IBR Program assumes will absorb the large shift in person trips onto transit. We request that you provide data to show the traffic forecast if the completion of the new transit connections and increased service levels are reduced or are not provided at the time of bridge construction.

Thank you,

Jeff Owen
Principal Planner, Transportation Planning
Clackamas County, Transportation & Development: Long Range Planning
150 Beavercreek Road, Oregon City, OR 97045
jowen@clackamas.us<mailto:jowen@clackamas.us>
Mobile: 971-429-0813 l Desk: 503-742-4696
www.clackamas.us<http://www.clackamas.us/>

IBR Draft SEIS - RECORD #2486 DETAIL

First Name :	Narek
Last Name :	Daniyelyan
Attachments :	WSU Vancouver_Resize.pdf (67 kb) image001.png (5 kb) WSU Vancouver Signed SEIS LoS.pdf (100 kb)

WASHINGTON STATE UNIVERSITY
VANCOUVER

November 15, 2024

Program Administrator Greg Johnson
Interstate Bridge Replacement Program
500 Broadway St, Ste 200
Vancouver, WA 98660

RE: Draft SEIS Public Comment

Dear Program Administrator Johnson:

On behalf of Washington State University Vancouver, we offer our support for plans outlined in the Draft Supplemental EIS regarding replacing the I-5 bridge and improving its five-mile influence area.

WSU Vancouver serves approximately 2700 students and employs approximately 600 faculty and staff from all parts of Southwest Washington and the Greater Portland region. Many students work off campus while attending college, and twenty-four percent of employees commute to campus from Oregon where they reside. The Interstate Bridge creates congestion that can make the day unpredictable and therefore stressful for students and employees. Students and employees who commute using public transportation can spend more than two hours on any combination of bus and light rail—one way! The time spent in Interstate Bridge congestion results in costs to WSU Vancouver, the economy in general and the environment.

Despite a very tight geographic configuration within a built environment, we support the comprehensive multi-modal program design that would accommodate an additional 66,000 person-trips and 32,000 vehicle-trips through the corridor each day by 2045, while reducing accidents and backups. The proposal makes improvements by adding safety shoulders, a dedicated public transit lane, active transportation and auxiliary merge lanes. It also makes river navigation safer and protects ecosystems through modern stormwater management.

We are in favor of a single-level fixed-span configuration with two auxiliary lanes, allowing for an overall more gradual grade and no traffic-stopping lift span which brings obvious improvements to congestion, accident reduction and climate.

We prefer the following:

- A continued commitment to ensuring low-income communities, communities of color and other marginalized communities are considered and engaged throughout the entire bridge replacement process.
- Mitigation to support displaced or disrupted businesses during and after construction.
- Leveraging local partnerships and the local workforce when possible.
- Consideration for workforce housing.
- Retention of C Street ramps for secondary access to downtown Vancouver.
- Commencing construction as soon as possible, given rising construction costs.

We appreciate the efforts of all involved in planning, design and funding of this critical transportation facility expected to last a century.

Sincerely,

Emile Netzhammer III
Chancellor

WASHINGTON STATE UNIVERSITY
VANCOUVER

November 15, 2024

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Interstate Bridge Replacement Program
500 Broadway St, Ste 200
Vancouver, WA 98660

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Sincerely,

Emile Netzhammer III
Chancellor

IBR Draft SEIS - RECORD #2487 DETAIL

First Name :	Eva
Last Name :	Frazier
Attachments :	DSEIS2487_Frazier_Original.pdf (5 kb)

IBR Draft SEIS - RECORD #2487 DETAIL

Submission Date : 11/15/2024
First Name : Eva
Last Name : Frazier
Business/Organization/Agency :

Submission Input :

First Name:
Eva

Last Name:
Frazier

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
I have lived and worked in Portland for the last 18 years, regularly making the 5 mile trip across the river to Vancouver. I understand the frustrations of folks that are "stuck in traffic", but we need to have the strength and resolve to move humans and goods more efficiently. SOVs may be comfortable and convenient for the user, but they are oversized, heavy, and contribute GHG emissions and dangerous particulates into our air and water. Freight, active transportation, and transit need to see the most prioritization in this project. I believe the

vehicle lanes of the bridge should simply be replaced and not expanded with the addition of efficient light rail, BRT, and comfortable walking/cycling facilities. Let's look to California for their highway and bridge tolling practices which prioritize carpool and vanpool and reduce delays for freight.

JCA comment #: 439

IBR Draft SEIS - RECORD #2488 DETAIL

First Name :	Karin
Last Name :	Edwards
Attachments :	DSEIS_2488_ClarkCollege_Original.pdf (230 kb) image001.png (3 kb) Draft SEIS public comment.pdf (230 kb)

Dr. Karin Edwards
President
Clark College
1933 Fort Vancouver Way
Vancouver, WA 98663
kedwards@clark.edu
(360) 992-2101
11/15/2024

Program Administrator Greg Johnson
Interstate Bridge Replacement Program
500 Broadway St, Ste 200
Vancouver, WA 98660

Dear Greg,

On behalf of Clark College, I am writing to express our support for the plans outlined in the Draft Supplemental Environmental Impact Statement (SEIS) concerning the replacement of the I-5 bridge and the associated improvements within its five-mile influence area. This project will significantly enhance the transportation network serving our region, and the proposed improvements will provide lasting benefits for both the local community and the broader region.

Clark College and its students, faculty, and staff are directly impacted by the I-5 bridge. As an institution, we rely on the bridge and its surrounding infrastructure to provide access for students and employees who commute to campus daily. Furthermore, many of our students and staff live across the river in Portland and depend on the I-5 bridge for access to essential services, employment, and educational opportunities. The ability to maintain safe, efficient, and reliable transportation through this corridor is vital for us.

We are particularly encouraged by the comprehensive, multi-modal approach outlined in the proposal. The plan to accommodate an additional 66,000 person trips and 32,000 vehicle trips by 2045 while enhancing safety, reducing congestion, and improving accident rates is a forward-thinking solution that will benefit our region for generations to come. The proposed inclusion of safety shoulders, a dedicated public transit lane, active

transportation infrastructure, and auxiliary merge lanes are welcome improvements. We also support improving river navigation and protecting local ecosystems through modern stormwater management practices.

In addition, we support the following elements of the proposed plan:

- The inclusion of a second auxiliary lane, wherever feasible, to further enhance capacity and traffic flow.
- Mitigation measures to support displaced businesses during and after construction, ensuring minimal economic disruption for affected stakeholders.
- An expedited construction timeline, given the rising costs of construction and the urgency of improving the region's transportation infrastructure.

We understand the significant challenges involved in planning and funding such an ambitious project, but we also recognize the long-term value it will bring to our community and the entire I-5 corridor. The improvements proposed in the Draft SEIS will make this critical transportation route safer, more efficient, and more sustainable, providing economic, environmental, and social benefits for years to come.

Thank you for your efforts in moving this important project forward. We appreciate the work of all those involved in the planning, design, and funding stages and look forward to continued collaboration as the project progresses.

Sincerely,

Karin Edwards, Ed.D.
President, Clark College

Dr. Karin Edwards
President
Clark College
1933 Fort Vancouver Way
Vancouver, WA 98663
kedwards@clark.edu
(360) 992-2101
11/15/2024

Program Administrator Greg Johnson
Interstate Bridge Replacement Program
500 Broadway St, Ste 200
Vancouver, WA 98660

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Sincerely,

Karin Edwards, Ed.D.
President, Clark College

IBR Draft SEIS - RECORD #2489 DETAIL

First Name :	Alexander
Last Name :	Miller
Attachments :	DSEIS-2489_Miller_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #2489 DETAIL

Submission Date : 11/15/2024
First Name : Alexander
Last Name : Miller
Business/Organization/Agency :

Submission Input :

First Name:
Alexander
Last Name:
Miller
Email:
[redacted]
Topic Area:
Transportation
Comment:
Hello, having reviewed the SEIS I think it's important to note that the utility of multimodal and non-automotive transport seems deprioritized. I request that designs minimize the travel time and barriers to bicycle, pedestrian, and similar traffic. For instance, the current plans require significant backtracking to get on and off the bridge for many users. A direct connection to N Vancouver/Williams would be better, and to Evergreen in Vancouver WA. Similarly, access to the bridge is limited by the height of the multimodal path - the long winding decline in Vancouver makes riverfront access inconvenient at best and very difficult for disabled users. Additionally, the multimodal path needs better emergency access and protection from vehicle noise and debris - can the transit lane go between the path and the cars/trucks?

Second topic: transit connections. We should build today for anticipated heavier transit use tomorrow. This includes longer (four-car) trains and multi-lane bus rapid transit infrastructure.
Finally, the traffic modeling should fully consider induced demand to accurately predict future usage. If you build it they will come- viz, Los Angeles.
Thank you.
JCA comment #: 438

IBR Draft SEIS - RECORD #2490 DETAIL

First Name :	Matt
Last Name :	Greer
Attachments :	DSEIS-2490_Greer_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #2490 DETAIL

Submission Date :	11/15/2024
First Name :	Matt
Last Name :	Greer
Business/Organization/Agency :	CEO Windward Construction, LLC - Owner/Partner Home Care Medical

Submission Input :

First Name:
Matt

Last Name:
Greer

Business or Organization:
CEO Windward Construction, LLC - Owner/Partner Home Care Medical

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Hayden Island Issues

Comment:
We own a long term rental property (14 years) at Jantzen Beach Moorage which is shown as being in the

construction easement. I would like to better understand how we will be compensated for reduced housing demand on the island because of the bridge noise, and how to get in touch with those handling imminent domain and temporary easement compensation. Most of our tenants stay for a year to year and a half lease so I imagine finding new tenants will be difficult once construction starts.

Additionally, the long overdue Hayden Island only bridge is needed ASAP and should be free from any tolls. Thank you.

JCA comment #: 437

IBR Draft SEIS - RECORD #2491 DETAIL

First Name :	Ellen
Last Name :	Churchill
Attachments :	DSEIS-2491_Churchill_Original.pdf (16 kb)

IBR Draft SEIS - RECORD #2491 DETAIL

Submission Date :	11/15/2024
First Name :	Ellen
Last Name :	Churchill
Business/Organization/Agency :	HINooN

Submission Input :

First Name:
Ellen

Last Name:
Churchill

Business or Organization:
HINooN

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Hayden Island Issues

Comment:
Concerns Regarding the Current I-5 Bridge Replacement Project [IBRP]

REMEDIATED 2024-07-04.

A replacement I-5 bridge would uniquely affect Hayden Island. Situated in the middle of the Columbia River, Hayden Islanders have few access choices, making us entirely dependent on the I-5 Bridge. In addition, the I-5 Bridge goes through the inhabited half of the Island, cutting it in two. The island population has now over 3,000 full-time residents, and the number is increasing due to new apartment building construction (1).

Here are some of the main concerns of many residents:

1. LIMITED ACCESS TO VANCOUVER AND PORTLAND:

Limited jobs and services exist on the Island. Islanders regularly travel north via I-5 to Vancouver, WA, for groceries and essential services, which (depending on the time of day) is often less congested for islanders than the I-5 south route to Portland.

The IBRP suggests they could add an alternative route across North Harbor for islanders to travel south into Portland. Nevertheless, because this small back road would be the main roadway for large trucks, including supply chain freight, along with residents traveling for services and jobs in Portland, we expect it would have heavy congestion and safety issues. However, such additional access would provide Hayden Islanders with a long-needed alternative route in the event of an emergency evacuation of the Island.

A report prepared by the Oregon Seismic Lifelines Route identification project for ODOT (3) says that a key factor in the resilience of the transportation network is the seismic performance of bridges. Bridges are essential to the post-earthquake mobility of nearly all transportation modes, as they are relied upon to carry goods and people into and out of urban centers after natural disasters. I-5 is a major seismic or other major disaster lifeline route (4) in Oregon. Hayden Island is completely dependent on I-5 as its lifeline. This is why it is so important to Hayden Island residents, the businesses and visitors, that the design of the I-5 Columbia River crossing, whether bridge or tunnel, is done right!

2. ADDITIONAL EXPENSES CAUSED BY TOLLING:

Since I-5 is the main roadway for islanders, the planned tolls on I-5 would be detrimental to Islanders daily. The interstate highway has been the only way on and off the Island since the 1970s. It is our neighborhood road. The Island has a large, manufactured homes park, and many lower-income residents would face economic hardship and stress from the added expenses. There is also a concern that tolls would have strong negative impacts on the Jantzen Beach Shopping Center and numerous businesses would leave the Island. The loss of local jobs for numerous islanders, plus the loss of local stores, would have dire consequences for the whole Island community.

3. HIGH BRIDGE SAFETY ISSUES:

The U.S. Coast Guard (which is an arm of the U.S. Department of Homeland Security) has a Congressional mandate to protect river commerce. An essential aspect is vetting all bridge construction to ensure that existing

water traffic can continue to pass underneath, as well as making allowances for industry and the historical trend towards larger vessel sizes. The most critical parameter is the VNC (vertical navigation clearance), which is 180 feet for the distance from the mouth of the Columbia River to the Burlington North Railroad (BNRR) Bridge at Vancouver. The current I-5 Bridge lift span has a VNC of 178 feet, which the U.S. Coast Guard states must be maintained to sustain river commerce. This height considers the shipbuilding industries east of the I-5 Bridge, emergency river access to PDX airport, and the trend towards larger ships.

However, because of the problems of building a bridge with a minimum VNC of 178 feet, the Coast Guard strongly recommended to the IBRP that they should build either a low bridge with a Bascule lift span or an immersed tunnel (2). HINooN strongly supports the U.S. Coast Guard and its mandate to protect Columbia River commerce! Moreover, HINooN is troubled by the IBRP's apparent promulgation of misinformation about the viability of these alternatives for improving traffic flow across the Columbia River.

Unfortunately, IBRP's multi-modal fixed-span high bridge design would subject I-5 traffic traveling over the Columbia River to excessive dangers from the over-steep grades to the top and down again, together with limited lines of sight caused by the bridge hump, especially during inclement weather. With a multi-modal fixed-span high bridge, the dangers experienced from fog and rain, frost, snow, sleet, hail, and ice, including the potentially grave dangers of black ice, would be much worse than on our existing I-5 bridge!

Passageway and roadway grades need to be safe and not too challenging for cyclists and pedestrians. In addition, pedestrian access needs to cater for baby strollers and people using mobility aids such as wheelchairs and walkers. Moreover, year-round, vehicular bridge access must be safe at all times of the day for heavily loaded trucks, buses, cars, and commuter light rail (which has strict grade requirements). Catering for all these modes of transportation would require extending a fixed-span high bridge to the north and south to an unacceptable degree, potentially making it several miles long and potentially destroying a valuable natural wetlands area just south of North Harbor. Finally, the height and length of the approaches of a high bridge would reduce the feasibility of on/off ramps for Hayden Island due to cost.

Another big concern that a high bridge would cause is the creation of a vast wasteland of concrete pillars and earthen ramps. Not only would this consume a sizable portion of Hayden Island's precious and limited real estate, but it would also be detrimental to people working and living under the umbrella of its enormous shadow.

4. EARTHQUAKE VULNERABILITY:

We are concerned that the IBRP's current bridge plans specify a bridge that is no more seismically safe than the existing I-5 bridge.

Moreover, we are worried about the dangers of the lack of a solid foundation for a high I-5 bridge over the Columbia River. The CRC project documents that the proposed path crosses over sand and alluvium, many hundreds of feet deep, material that expert opinion states is subject to seismic liquefaction. Furthermore, to make a high bridge seismically acceptable would require excessive billions of dollars added to the cost compared to other approaches. We have seen expert testimony that a high bridge has a much lower chance than expected of surviving in a severe earthquake in our region. Liquefaction of the deep alluvial river bottom

soils would tend to cause a high bridge to buckle sideways. A low bridge with a Bascule lift span, or an immersed tunnel, could avoid this troubling outcome. We are worried that any kind of high bridge design would be most detrimental to many people in our region in so many ways.

5. INADEQUATE BIKE AND PEDESTRIAN PATHS:

While the IBRP bridge proposal includes biking and walking paths, it is unreasonable to expect people to carry their bikes to a height of 60 or 70 feet to get to a new I-5 freeway over the Island or walk uphill to get to the pathway on a spiral staircase.

Please note: The I-205 Bridge has a bike path down the freeway center, which can present extreme dangers to cyclists from other road users, and it directly subjects cyclists to increased air pollution effects. We worry that the same scenario is happening with the IBRP proposal.

6. QUALITY OF LIFE DURING CONSTRUCTION AND HOW THIS WOULD BE MITIGATED:

If construction starts as presented by the IBRP proposal, we believe the construction equipment would overburden Island residents. We would experience adverse living conditions, including but not limited to countless traffic disruptions to everyday life, while on the Island and both when trying to leave or to return to the Island. There would also be increased air pollution, loud noise, and strong vibrations. These problems would seriously impact residents, businesses, and visitors for years. How would these issues be mitigated?

Note: There are no medical facilities located on the Island. The Fire Station 17 (Hayden Island) EMTs and Paramedics serve people here and have saved many lives. We have a big question: How will the bridge's construction affect this vital emergency service both on and off the island?

7. CRITICAL ENERGY INFRASTRUCTURE (CEI-Hub) – CASCADIA SUBDUCTION ZONE (CSZ) EARTHQUAKE (MAGNITUDE 8-9) AND THE I-5 BRIDGE REPLACEMENT PROGRAM (IBRP) – THE THREAT OF SOIL LIQUEFACTION We are very concerned that the critical issue of the CEI Hub does not appear in the IBR program Draft Supplemental Environmental Impact Statement (High Priority Hazardous Materials Sites), nor is it mentioned in the current IBR program Bridge Influence Area (BIA). Because of the passage of SB 1567, Oregon has the authority to require seismic upgrading of the CEI Hub to withstand a Cascadia Subduction Zone (CSZ) earthquake of magnitude 8-9. However, because both the CEI Hub and the IBR program Locally Preferred Alternative (LPA) are in the same large liquefaction zone, the IBR program can and should identify the CEI Hub as being nearby or adjacent to the modified LPA. The liquefaction zone mapped in the DOGAMI Soil Liquefaction Assessment* covers the area from the CEI Hub on the west side of the Willamette River, to Hayden Island, and extends to Gresham in the east.

Please note: The BNSF rail network transports tanker cars filled with highly flammable fuels to the CEI Hub. These trains regularly travel across the Columbia River from Vancouver, passing across Hayden Island. This hazardous fuel transportation has many attendant risks to both Portland and Vancouver, including to the I-5 bridge and its surrounding areas.

Reference #6 at the end of this paper has a link to a paper by the Institute for Sustainable Solutions – “Risk of Earthquake-Induced Hazardous Materials Releases in Multnomah County, Oregon: Two Scenarios Examined”. This paper maps the location for soil liquefaction and chemical release plumes in the event of a Cascadia Subduction Zone Earthquake, magnitude 8-9.

Note: An Immersed Tube Tunnel option, being one of the two options strongly recommended by the USCG, appears to be a good option for a river crossing between Portland and Vancouver, and would also be more likely to withstand a major earthquake.

8. DISPLACED HOMES

Jantzen Beach Moorage (JBMI) is a unique river community with over 150 floating homes, but three rows of homes are in the direct path of IBRP’s planned bridge. These homes would be permanently lost, which would have a huge impact on the individual residents as well as the whole community structure itself. It is unknown where these homes could even be relocated to. How will all these floating homes owners and the community be compensated?

RECOMMENDATIONS:

HINooN and Hayden Island residents strongly feel that the IBRP must consider the other river crossing options strongly recommended by the Coast Guard. HINooN is apprehensive that the IBRP is not really listening to the Coast Guard or Island residents. HINooN believes that the IBRP will continue to push for a 116-foot bridge height, although there is no statutory basis for IBRP to do this.

The IBRP’s push for a VNC of 116 feet, although sixty-two feet below the Coast Guard’s requirement of 178 feet, still qualifies as a high bridge and has many of the same problems as a 178-foot VNC. Any new bridge across the Columbia River must consider the combined issues of legal height requirements, grade requirements, the climate, and the safety and comfort of travelers and nearby residents. As strongly suggested by the Coast Guard, the DOTs should look at more straightforward and lower-cost approaches such as:

i) Low bridge with a Bascule lift span or

ii) Immersed tunnel,

both options which do not have the too low VNC issue.

If neither of these designs are embraced by IBRP, we hope that the Oregon and Washington Legislatures consider redirecting their efforts towards a third Columbia River crossing using either the low bridge with Bascule lift span or the immersed tunnel option - or consider invoking the no-build option.

CONCLUSIONS:

The IBRP assumes they have a community consensus on the bridge design when the IBRP apparently do not

yet know what that design is. Island residents are at ground zero, are directly impacted, and therefore need to know the exact details of the design! For example, what are the site details for the proposed light rail terminal? Where are the detailed plans for the exit ramps? Judging by the IBRP's troubled performance at the Joint Oregon-Washington I-5 Bridge Committee (5), the IBRP does appear to be misleading the public.

Hayden Island Neighborhood Network [HINooN] asks for a regional plan to improve traffic flow across the Columbia River while protecting river commerce. Our concerns about climate change and the environment led us to advocate retaining the existing I-5 Columbia River Bridge (seismically retrofitted) for local traffic and redirecting the bulk of river-crossing transportation resources into a third river crossing with a Bascule span or submersed tunnel. Whatever is built, we believe it is vital that the project carefully considers the effects of climate change in our Pacific NW weather environment.

Hayden Island does not need continued congestion on a higher, wider, and overly expensive bridge that not only blocks a significant amount of river commerce and marine emergency river traffic for the next hundred years, does not fix the complex traffic congestion problems, but destroys Hayden Island.

This letter describes the main concerns of many Island residents. These concerns reflect the information available to HINooN as of the date of this submission. They will be updated as additional relevant material becomes available.

Thank you for your time and attention.

Respectfully,

Board of Directors,

Hayden Island Neighborhood Network [HINooN]

References:

(1) Hayden Island Civic Life

https://www.portland.gov/sites/default/files/2022/hayden-island_civiclife_0.pdf

(2) Coast Guard Preliminary Navigation Clearance Determination

https://www.interstatebridge.org/media/fi2b3xei/ibr_next_steps_bridge_permitting_june2022_remediated.pdf

(3) Oregon Seismic Lifelines Identification Project Report prepared for ODOT

https://www.oregon.gov/lcd/NH/Documents/Apx_9.1.16_SeismicLifelines_PREFL_OPT.pdf

Local highways selected for this list includes I-5 and Pacific Highway No. 1 (the California state line south of Ashland to the Washington state line in Portland); I-84, Columbia River Highway No. 2 (I-5 in Portland to US 97

at Biggs Junction); I-205, East Portland Freeway, Highway No. 64 (I-5 in Tualatin to the Washington state line); Oregon Route (OR) 217, Beaverton-Tigard Highway No. 144 (OR 26 in Beaverton to I-5 in Tigard); I-405, Stadium Freeway Highway No. 61 (I-5 at the south end of the Marquam Bridge to I-5 at the east end of the Fremont Bridge in Portland).

(4) Seismic Lifeline Routes in Oregon

ODOT Life Lines

https://www.co.clatsop.or.us/media/11331

(5) May 7, 2022, City Commentary. “Oregon and Washington DOTs plan too low a bridge–again”, by Joe Cortright.

https://cityobservatory.org/oregon-and-washington-dots-plan-too-low-a-bridge-again/

(6) Institute for Sustainable Solutions – Risk of Earthquake-Induced Hazardous Materials Releases in Multnomah County, Oregon: Two Scenarios Examined: See pages 38, 79, 80, 85,86, and 87 for Plume maps.

Risk of Earthquake-induced Hazardous Materials Releases in Multnomah County, Oregon

Multnomah County has 1,100 industrial facilities that store chemicals, known as Tier II facilities. Many of the top seventy high-risk facilities are in areas where the soil will liquefy during a major earthquake. Portland State University Institute for Sustainable Solutions / Portland State University Institute for Sustainable Solutions”

https://multco-web7-psh-files-usw2.s3-us-west-2.amazonaws.com/s3fs-public/FOUO%20Report%20for%20Multnomah%20County%20from%20ISS%2C%20Risk%20of%20Earthquake-Induced%20Hazardous%20Materials%20Releases%2010-11-2023v1.pdf

Introduced by: Martin Slapikas, HINooN Board Member

Ellen Churchill, HINooN Board Member, Secretary

Janet Roxburgh, HINooN Board Member

Alastair Roxburgh, HINooN Resident

JCA comment #: 436

IBR Draft SEIS - RECORD #2492 DETAIL

First Name :	Alyssa L (DOH)
Last Name :	Shaw
Attachments :	IBR Program Health Analysis Full Report 11.15.24_NoComments.pdf (3 mb) image001.png (14 kb) image002.png (13 kb) IBR Program Health Analysis Full Report 11.15.24.pdf (3 mb)

November 15, 2024

Thomas Goldstein, PE, IBR Program Oversight Manager, Federal Highway Administration
Jeffrey L. Horton, PE, Regional Engineer, Federal Transit Administration
Chris Regan, IBR Environmental Manager, Interstate Bridge Replacement

RE: Health Analysis of Interstate Bridge Replacement Program Draft Supplemental Environmental Impact Statement EIS #20240163

Dear Mr. Goldstein, Mr. Horton, and Mr. Regan,

Thank you for the opportunity to comment on the Interstate Bridge Replacement (IBR) Program Draft Supplemental Environmental Impact Statement (DSEIS). In late 2023 IBR Program partners requested that an independent health impact assessment (HIA) be prepared to understand the Program's potential effects on community health and well-being.

The Washington State Department of Health, Oregon Health Authority, Clark County Public Health, Multnomah County Health Department and Cowlitz Indian Tribe Health and Human Services recognized the importance of the bridge replacement program to advancing health, equity and environmental justice in the region and in early 2024 agreed to work collaboratively to respond to this request. Our agencies further agreed to the IBR Program's request to complete an analysis for submission as a comment to the IBR Program's DSEIS. To meet this goal, our agencies have conducted a modified health analysis relying on literature review, existing data, and public health best practices, as the timing would not allow completion of a full HIA.

As one of the largest infrastructure projects in the region, the IBR Program provides tremendous opportunity to positively impact residents' health and advance environmental justice and equity. We believe incorporating public health as a core value of the IBR Program now and throughout its decade-long design and construction is vital to achieving these shared priorities.

The attached Interstate Bridge Replacement Program Health Analysis includes evidence-based information about potential health impacts related to air quality, transportation and active transportation, climate change and health, noise, social determinants of health, and water quality. It concludes with detailed recommendations that we encourage the IBR Program to consider implementing to improve health through design, construction, and the lifetime of the project.

We appreciate the opportunity to provide this analysis as a formal comment to the DSEIS. The contributing agencies and governments may have additional comments for the IBR Program. We are ready to continue to support the important work to ensure the equitable distribution of the transportation, economic, disaster resilience and other benefits of replacing the Interstate Bridge between Oregon and Washington.

Sincerely,

Lauren Jenks
Assistant Secretary, Environmental Public Health
Washington State Department of Health

André Ourso
Administrator, Center for Health Protection, Public Health Division
Oregon Health Authority

William Iyall
Tribal Chairperson
Cowlitz Indian Tribe

Dr. Alan Melnick
Public Health Director and Clark County Health Officer
Clark County Public Health

Andrea Hamberg
Interim Public Health Director
Multnomah County Health Department

Interstate Bridge Replacement Program **Health Analysis**

Prepared by:
Washington State Department of Health
Clark County Public Health
Cowlitz Indian Tribe Health and Human Services
Oregon Health Authority
Multnomah County Health Department

November 15, 2024

DOH 334-565 November 2024

Acknowledgements

Health analysis working group members who contributed to this report:

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These health agencies formed a health analysis working group and began meeting in January 2024. This report will refer to that group as “the working group”, and use “we” and “our” to discuss our analysis and recommendations throughout.

We would especially like to thank the colleagues from all working group agencies who contributed their subject matter expertise and thoughtful review to this report.

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Glossary

Acronyms

ACS	American Community Survey (U.S. Census Bureau)
BIPOC	Black, Indigenous, and people of color
CDC	United States Centers for Disease Control and Prevention
DOT	United States Department of Transportation
DSEIS	Draft supplemental environmental impact statement
EJ	Environmental justice
EJI	Environmental Justice Index (CDC)
EPA	United States Environmental Protection Agency
FHWA	United States Federal Highway Administration
FTA	United States Federal Transit Administration
GHG	Greenhouse gas
HIA	Health impact assessment
I-5	Interstate 5
IBR	Interstate bridge replacement program
LPA	Locally preferred alternative
LRT	Light-rail transit
MOVES	MOtor Vehicle Emissions Simulator (EPA)
MSAT	Mobile source air toxics
NBA	No-Build Alternative
NEPA	National Environmental Policy Act
ODOT	Oregon Department of Transportation
OHA	Oregon Health Authority
PM	Particulate matter
SVI	Social Vulnerability Index (CDC)
USACE	United States Army Corps of Engineers
VMT	Vehicle miles traveled
WADOH	Washington State Department of Health
WHO	World Health Organization
WSDOT	Washington State Department of Transportation

Definitions

Our working group definitions:

This report discusses “built environment”, “cumulative health impacts”, “environmental health”, “environmental justice”, and “health equity”. The working group of agencies that conducted the health analysis agreed upon the following definitions of those terms to guide our work.

Built Environment

The CDC describes the built environment as "the physical makeup of where we live, learn, work, and play. It involves homes, schools, businesses, streets and sidewalks, open spaces, and transportation options. The built environment can influence overall community health and individual behaviors such as physical activity and healthy eating."[1] An estimated 20% of premature mortality could be prevented through changes to the built environment.[2]

Built environment features can directly affect a community's health through exposures that residents cannot avoid, such as poor air quality or heat exposure. They can also positively or negatively affect the health decisions that are available to residents, such as access to healthy food and healthcare services, which encourage physical activity and reduce stress. The World Health Organization explains how "cities can – and should – promote health through the reduction of air pollution, noise and urban heat islands, the promotion of active and healthy lifestyles, the provision of available – and affordable – healthy food, climate action, and proper housing conditions, waste management and sanitation, among others. In a nutshell, cities will be used in the way we design them."[3]

Cumulative Health Impacts

Cumulative health impacts refer to the combined effect of many factors that influence individual, community, and environmental health. Environmental factors can interact with individual and social factors, and the built environment, to make a person more susceptible to health impacts such as age, genetics, underlying or chronic health conditions, and structural racism.[4,5]

Cumulative health impacts also refer to inequities that are often layered on one another that create disproportionate harm to individuals and communities. Health disparities can be exacerbated by environmental factors, inequities exist in environmental exposures on the individual and community levels, biological and genetic factors determine and can modify impacts of environmental exposures, and social vulnerabilities "may amplify the effects of environmental hazards".[5]

Environmental Health

Environmental health "centers on the relationship between people and their environment".[6] As a public health practice, environmental health aims to prevent and reduce exposures to hazards and risks through protecting "air, water, soil and food".[6–8]

Environmental Justice

The American Public Health Association defines environmental justice as "the idea that all people and communities have the right to live and thrive in safe, healthy environments, and with equal environmental protections and meaningful involvement of these actions."[9] Washington and Oregon have both expanded on that definition to state that environmental justice also includes protection from disproportionate environmental and health impacts.[10,11] Finally, both states include equitable distributions of resources and benefits, in addition to the elimination of harm.[10,12]

To promote environmental justice, you must identify and remedy environmental injustice.

Health Equity

Health equity is the opportunity for everyone "to attain their highest level of health".[13,14] Both the Washington State Department of Health and Oregon Health Authority encourage health equity and that a person's health and well-being are "not disadvantaged by their races, ethnicity, language, disability, age, gender, gender identity, sexual orientation, social class, intersection among these communities, or other socially determined circumstances".[15] Getting to health equity requires undoing inequity and "requires attention to the root causes of health issues and a focus on the communities that are more affected".[16]

IBR Program definitions:

This report also discusses terms defined by the IBR Program, including "equity priority communities", and the "modified locally preferred alternative". The definitions of those terms by the IBR Program are below. We accessed the definition of "equity priority communities" in the IBR Program Equity Framework at https://www.interstatebridge.org/media/1ggih5ae/ibr_equity-framework-final-update-feb-2024_remediated.pdf. We accessed the definition of "modified locally preferred alternative" on the IBR Program website at https://www.interstatebridge.org/nextsteps.

Equity Priority Communities[17]

The Interstate Bridge Replacement Program Equity Framework defines "Equity Priority Communities" or "historically underserved communities" as "Communities, populations, and individuals who have been historically excluded from transportation decision-making, systematically discriminated against, and experience social, economic, and health disparities. These terms are used interchangeably in this document. It is important to note that broad terms such as these change over time, by geography, and perspective. Given That the IBR program spans two states and diverse populations, we acknowledge that there is no right answer and that these terms may evolve over the course of the program in response to local preferences and other factors.

IBR Program Equity Priority Communities include:

- BIPOC: People who identify as Black, Native American and Alaska Native, Native Hawaiian and Pacific Islander, Central and South American Indigenous, Asian, Latin American, Hispanic, and/or one or more non-white races or marginalized ethic groups.
- People living with disabilities: People who have a physical or mental impairment that substantially limits one or more major life activities, people who have a history or record of such an impairment, or a person who is perceived by others as having such an impairment.
- Tribal Governments: (Federally Recognized Tribes) are sovereign nations as recognized by the United States Government, and consultation with federally recognized tribes occurs through a government-to-government consultation process separate and distinct from public and community outreach and comment.
- Communities with Limited English Proficiency: Groups with individuals who indicate that they speak English less than "very well" on the census.
- Persons with lower income: Individuals or households with income below 200 percent of the federal poverty level.
- Individuals and families experiencing houselessness: Individuals and families lacking or in need of a house or home.

- Immigrants and refugees: Immigrants are people born outside of the United States, and refugees are people who have left their country of origin due to persecution or fear of persecution due to race, religion, nationality, political opinion, or membership in a particular social group.
- Young people: Individuals 24 years old or younger.
- Older Adults: Individuals 65 years old or older."[17]

Modified Locally Preferred Alternative[18]

According to the IBR Program website, "The Modified Locally Preferred Alternative (LPA) refers to an agreed upon set of components that will be further evaluated through the environmental review process. It is NOT the replacement bridge's final design but rather a key milestone setting the program's direction as we start to test and evaluate plans for a replacement multimodal river crossing system. Elements of the Modified LPA under analysis include:

- A new pair of Columbia River bridges built west of the existing bridge. Three bridge configuration options are under consideration: single-level fixed-span, double-deck fixed-span, and single-level movable-span.
- Improvements to the I-5 mainline and seven interchanges, north and south of the Columbia River, including options with or without C Street ramps and I-5 alignment options in downtown Vancouver, as well as related enhancements to the local street network.
- Extension of light rail from the Expo Center in Portland to Evergreen Boulevard in Vancouver, along with associated transit improvements, including transit stations at Hayden Island, Vancouver Waterfront, and near Evergreen Boulevard and options for park and ride locations in Vancouver.
- One or two auxiliary lane(s) in each direction and safety shoulders on the bridge.
- A variety of improvements for people who walk, bike and roll throughout the program area.
- Variable rate tolling for motorists using the river crossing as a demand management and financing tool.

What we learn from the review process, and corresponding environmental studies, will determine how we move forward, and necessary work to avoid, minimize or mitigate negative effects to our environment. This process will include opportunities for review and public comment and will inform the design refinements and decisions."[18]

Executive Summary

Prepared by: Washington State Department of Health, Clark County Public Health, Cowlitz Indian Tribe Health and Human Services, Oregon Health Authority, Multnomah County Health Department

Interstate Bridge Replacement Program Overview & Public Comment Information

The Interstate Bridge Replacement (IBR) Program will be one of the largest infrastructure projects in the region for a generation. Because of this scale, it provides tremendous opportunity to positively impact health and advance environmental justice and equity.

The project underwent an evaluation through the National Environmental Policy Act (NEPA) to assess potential impacts. From September 20 to November 18, 2024, the IBR Program held a public comment period on its Draft Supplemental Environmental Impact Statement (DSEIS), a series of draft documents that cover topics studied under the environmental review.

Health Analysis Overview

As part of the planning and implementation of the IBR Program, regional partners requested that a health impact assessment (HIA) be included to understand the project's effects on community health and well-being. State and local health departments in Oregon and Washington, joined by a representative from Cowlitz Indian Tribe Health and Human Services, began meeting in early 2024 to collaborate to complete this request. Time constraints limited the scope of the HIA, and a modified health analysis relying on literature review, existing data, and public health best practices was drafted. The health agencies reviewed readily available information and select DSEIS technical reports to examine the potential health effects of the Modified Locally Preferred Alternative (LPA) – including environmental justice and health equity concerns. The health analysis assesses potential health impacts of the Modified LPA and does not propose an alternative.

The Health Analysis was submitted as a public comment to the IBR Program before the end of the public comment period in November 2024. This summary highlights key takeaways for each topic area and an overview of the project recommendations that were submitted to the IBR Program. The *Recommendations* section of the Health Analysis includes additional detail and implementation suggestions.

For more information about the health analysis, contact EHAssessment@doh.wa.gov.

Topic Areas

The Health Analysis identifies six topic areas of public health interest related to the program. Each topic area is represented by an icon. An icon or multiple icons accompany each of our recommendations to indicate which topic area and associate health outcomes could be improved by implementation of the recommendation:

- Air quality
- Climate change and health
- Transportation & active transportation
- Social determinants of health
- Noise
- Water quality

Key Takeaways

To reduce negative health impacts of the IBR Program, we recommend decision-makers design, construct, and maintain a program that prioritizes human health and safety, ecological health, and environmental justice. There are a number of places throughout the DSEIS where there is insufficient information to determine health impacts. There are also many decisions to be made for the final SEIS, design decisions, and local decisions that could change the assessment of the project having either a positive, negative, or neutral impact to health. We encourage keeping public health partners, community, and Tribal representation at the table in decision-making for the Program.

There is **sufficient evidence** in the DSEIS for the following potential health impacts of the Modified LPA:

- **Potential protective elements and positive health impacts**
    - **Transportation and active transportation:** The extension of light rail services and addition of enhanced pedestrian and bike facilities will likely increase physical activity and improve health. Expanding design and policy decisions that encourage people to walk, roll, bike, or use transit, rather than drive, would increase health benefits.
    - **Access**: Bringing the bridge, and auxiliary connections, up to or exceeding standards under the Americans with Disabilities Act (ADA) would improve access for all. Using inclusive or universal design, which centers around older adults, people with disabilities, and children, would increase benefits.
    - **Heat**: Providing shade and cooling for bridge users, especially active transportation users, could provide protection from heat-related health outcomes.
    - **Employment:** The project would drive a temporary increase in construction-related employment. Increased access to light rail and transit services could increase access to jobs and other essential services. Increasing contracting for Disadvantaged Business Enterprises, Minority Business Enterprises, Women Business Enterprises, and Small Business Enterprises would increase equitable distribution of these benefits.
    - **Access**: The Modified LPA includes plans to expand connections between active transportation networks, trails, and parks. Increased access to greenspace would have a positive impact on health.
    - **Water quality**: Improvements to stormwater infrastructure would have positive health impacts on water quality, and the health of the ecosystem.
    - **Safety:** Replacement of the existing I-5 bridge will result in a structure with greater seismic resilience, minimize the risk of a bridge collapse during an earthquake, and support safety, regional travel, and access to essential services.

- **Potential harmful elements and negative health impacts**
    - **Air quality:** Given the existing high traffic volumes along the I-5 interstate bridge, people who live nearby are subjected to greater concentrations of air toxics and are at risk of experiencing additional air quality burdens. The DSEIS estimates a 33% increase in VMT under the Modified LPA by 2045 and increase in freight traffic volumes, which could increase particulate matter and negatively impact air quality.
    - **Transportation and active transportation:** Transit access to jobs for BIPOC residents, immigrants and refugees, and people under the age of 25 did not increase as much as it did for white, non-Hispanic residents. This indicates disparities would continue to remain, likely reinforcing disparities in opportunities for physical activity.
    - **Tolling**: Tolling would have a disproportionate impact on low-income community members and could negatively impact access to essential services like health care and culturally specific health care.

- **Access**: The IBR Program could negatively impact access to traditional cultural activities, culturally specific health care, and access to ancestral lands for American Indian and Alaska Native communities.
- **Access:** Construction delays on roads, delays to bus routes and light rail service, and closures of sidewalks and active transportation paths may negatively impact access to homes, jobs, schools, health care facilities, and other essential destinations. These impacts may be greater for those that do not have car access.
- **Noise**: The Modified LPA would approach or exceed noise abatement criteria at 65 locations in Portland and 135 locations in Vancouver, including Discovery Middle School. Children and their learning comprehension are particularly affected by noise. The DSEIS describes higher levels of noise and vibration will negatively and disproportionately impact communities identified as equity priority communities.
- **Displacement**: The IBR Program will acquire land displacing 43 homes and could also displace houseless residents in the project area. Between 32-35 businesses and 600-742 employees could be impacted due to property acquisitions. Equity priority communities of East Columbia, Rockwood, Esther Short, and Rose Village would be disproportionately impacted.

There is **insufficient evidence** for several topic areas to determine potential health impacts of the Modified LPA.

- **Climate change and health:** The DSEIS anticipates the Modified LPA will reduce greenhouse gas emissions (GHG) compared to the No-Build Alternative. Construction of the Modified LPA will produce GHG emissions. Several climate-related hazards are projected to impact the region throughout the construction and operation of the Interstate Bridge, including heat, wildfire smoke, severe weather and flooding. The health effects of climate change are not equally distributed, and several communities are disproportionately affected by climate change - including IBR Equity Priority communities. More information is needed about how the Program will mitigate climate change impacts to Equity Priority Communities and what protective elements for health and climate justice will be included in final design and construction plans.
- **Air quality:** Due to the large geographic area used to conduct the air quality analysis, and the statement in the DSEIS that localized health impacts due to air quality cannot be reliably quantified, more information is needed to reliably assess air quality impacts. This is the basis of our recommendation for air quality monitoring and further air quality assessment, including dispersion modeling. Air dispersion modeling incorporates data appropriate for analyzing potential health impacts on a local scale.
- **Road safety:** The DSEIS states that crashes will increase by 15% under the Modified LPA, mainly due to estimated increases in traffic volumes. The DSEIS does not provide clear information about how crash frequency would change by travel mode, crash type, severity, location, or for environmental justice communities. There is insufficient evidence in the DSEIS to conclude to what degree severe injury and fatalities would be reduced for active transportation users.
- **Fugitive dust**: There is insufficient information about mitigation plans for fugitive dust during construction and how that could impact air quality and water quality.
- **Water quality**: There is insufficient information in the DSEIS regarding a plan to sample and analyze hazardous sediments and toxic contamination prior to in-water work.

Topic Areas Summary

Air quality + health concerns + potential project impacts

- Transportation is a significant contributor to air pollution-related illness and premature death. Emissions from vehicles, including carbon monoxide, nitrogen oxides, and particulate matter, can lead to respiratory, cardiovascular, neurodegenerative, and metabolic diseases, as well as cancer and reproductive issues.
- The DSEIS projects that the Modified LPA would result in a 33% increase in vehicle miles traveled (VMT) by 2045 compared to the 2015 baseline. Despite the expected increases in VMT, the DSEIS predicts that vehicular emissions will decrease compared to the 2015 baseline. The DSEIS estimates this using modeling from EPA's MOVES model, which assumes that emissions will decrease due to the 2007 EPA Control of Hazardous Air Pollutants from Mobile Sources. This modeling was run on a geographic scale (including Clark, Multnomah, Clackamas, and Washington counties) that is too large to understand local health and environmental impacts in the project area.
- The DSEIS states that concentration of air toxics from mobile sources would likely be more pronounced on road segments where traffic would increase under the Modified LPA compared to the No-Build Alternative due to diversion to avoid tolls. However, many of these road segments were not included in the air quality analysis.
- Modified LPA policy decisions which minimize mobile sources of air toxics during the operation of the project and design elements which mitigate the coinciding health impacts, like green infrastructure and indoor air filtration, would reduce potential public health burdens.

Transportation and active transportation + health concerns + potential project impacts

- Physical activity improves a wide range of health outcomes across the lifespan. Transportation planning and design features influence the opportunities available to community members to be physically active by walking, biking, or using transit.
- Project construction may create travel barriers or delays to essential destinations, regardless of mode.
- The extension of the light rail line and addition of enhanced walking and bike facilities will likely increase physical activity and support improved community health.
- Traffic volumes are projected to increase under the Modified LPA. Design and policy options that encourage more people to walk, bike, or use transit, rather than drive, would yield additional health benefits through increased physical activity.
- The DSEIS projects that the Modified LPA will result in a 15% increase in crashes on the freeway network and negligible change in crash frequency on the local road network. No information is provided on projected changes in crash type or severity.
- Tolls have the potential to further encourage mode shift to transit. This could improve health outcomes related to physical activity and air quality. However, tolls could also have a disproportionate impact on low-income community members.

Noise + health concerns + potential project impacts

- Harmful traffic noise levels can contribute to chronic and cardiovascular disease, disturb sleep, and reduce cognitive functioning. Older adults, shift workers, and people with preexisting sleep disorders are more sensitive to noise-induced sleep disturbance, and children are particularly sensitive to noise-induced health effects and learning disruptions.
- The Modified LPA would approach or exceed noise abatement criteria at 65 locations in Portland and 135 locations in Vancouver, including residences, offices, and one school. Noise walls are the only proposed noise mitigation for the project.
- Noise monitoring during construction, and re-examination of noise mitigation would yield greater protection from harmful noise exposure for community members in the project area.

Climate change and health + health concerns + potential project impacts

- Climate change is associated with many adverse health outcomes, including but not limited to heat-related illness, respiratory illness, cardiovascular failure, adverse perinatal outcomes, mental health impacts, injury, and death. The health impacts of climate change are not equal, and several populations are disproportionately affected.
- The DSEIS *Climate Change Technical Report* projects several climate change scenarios with impacts in the region over the project period, including higher temperatures and more extremely hot days, more fires and severe smoke, changes in precipitation, and increased risks of flooding.
- Workers, pedestrians, bicyclists, transit users, and adjacent communities may be exposed to heat, wildfire smoke or poor air quality, and other severe weather events during bridge construction and operation.
- Modified LPA design and construction operations that prioritize reducing the urban heat island effect, increasing shade and respite from heat, mitigating flooding risks, and planning for heat, wildfire smoke, and other severe weather and climate (flooding, extreme precipitation) events could improve resiliency and yield more protection from climate change-related illness and injury in the project area.
- The DSEIS *Climate Change Technical Report* anticipates the Modified LPA would result in a reduction of greenhouse gas emissions compared to the No-Build Alternative.

Social determinants of health + health concerns + potential project impacts

- The construction and operation of the Interstate bridge replacement will influence other factors that affect health, including housing, income, employment, and access to greenspace and health care.
- The IBR Program could negatively impact access to traditional cultural activities, culturally specific health care, and access to ancestral lands for American Indian and Alaska Native communities.
- The Modified LPA requires the acquisition of land that would displace 43 homes. Construction could also displace houseless community members residing in the project area.
- The Modified LPA will have varied economic impacts. Between 32-35 businesses and 600-742 employees are projected to be impacted due to property acquisitions required for construction. The project will also drive a temporary increase in construction-related employment while the bridge is being built.
- The IBR Program will comply with the Uniform Relocation Assistance and Real Property Acquisition Policies Act to provide relocation assistance to displaced residents and businesses. Additional supports to lessen the emotional impact of displacement for all, like investments to support homeless individual relocation, workers affected by business displacement, and the return of displaced individuals or businesses, could support greater health and well-being.

Water quality + health concerns + potential project impacts

- Safe and clean water is essential for the health of humans, animals and the entire ecosystem. Impacts to the health of the Columbia River and surrounding waterways, including the Troutdale Aquifer, could not be more consequential.
- Construction, specifically in-water construction, will have impacts on turbidity of the water, and can disturb hazardous sediments and toxic contamination. There are already waterways in the project area with pollutants that have required monitoring.
- Fugitive dust from construction and demolition can settle into the water and impact water quality. Climate change and drought can increase concentrations of contaminants in water.
- The IBR Program will implement stormwater infrastructure which will help improve water quality. Continuing to adapt to emerging issues such as 6PPD contamination, which is lethal for salmon, could positively impact water quality and ecosystem health.
- The DSEIS *Water Quality Technical Report* and the DSEIS *Hazardous Materials Technical Report* discuss the need to sample and analyze the levels of hazardous sediments and toxic contamination, but no plan to conduct sampling or report on the results prior to in-water work.

Recommendations

Prioritize sustainability, transparency, communication and health for the lifetime of the project

1. Institute accessible systems for real-time two-way communication about project design and construction impacts to keep community members informed of project impacts, and the program informed of community impacts.
2. Prioritize health in program policies and decision-making throughout the lifetime of the program by incorporating regular engagement with community members, health department staff, and Tribal governments.

Provide additional information and modeling to better understand potential health impacts

3. Compile and release to the public more information about demolition plans for the current bridge infrastructure, including potential air quality, noise, and water quality impacts.
4. Expand information about potential air quality, safety, and connectivity impacts of design and construction.
5. Compile and release to the public additional information about potential air quality, safety, and connectivity impacts of tolling-related traffic diversion through neighborhoods.
6. Develop and release to the public a detailed sampling and analysis plan of riverbed sediment including potential contaminants, hazardous sediments, and toxics.

Design with health and equity in mind

7. Design active transportation (bike lanes, sidewalks, and multi-use trails) and public transportation that is accessible to all to improve air quality and physical activity.
8. Design safety features to reduce injury for active transportation users and vehicle users.
9. Improve greenspace and tree canopy cover to improve air and water quality, provide shade, and increase natural spaces.
10. Design with sustainable materials and standards to reduce greenhouse gas emissions.
11. Prioritize resilience to extreme weather events, climate change, and seismic events to improve safety.
12. Maintain and improve good air and water quality in the project area to protect physical and mental health.
13. Minimize noise in the project area to protect nearby neighbors and populations disproportionately affected by noise.
14. Improve connectivity and community cohesion to promote access to community and essential services.
15. Center equity and focus on local businesses in contracting to improve economic opportunities for underrepresented groups.
16. Minimize home and business loss, and proactively support displaced residents, businesses, and employees.

Construct with health and equity in mind

17. Meet and exceed, where possible, state and local requirements for noise, air quality, and water quality to protect the health of workers, community members, and the ecosystem.
18. Design and mark routes during construction to protect pedestrians and active transportation users from injury and environmental exposures.
19. Maintain community connectivity through reliable access to transit, neighborhood services, and regular transportation routes.
20. Protect workers and community members on high-risk days for high heat and poor air quality events.
21. Establish systems for continuous monitoring for noise and air quality during and after program construction, ensuring that pre-construction conditions are measured as a baseline.
22. Implement workforce development and support programs to develop and retain a diverse workforce.

Introduction

The Interstate Bridge Replacement Program is going to be one of the largest infrastructure projects in the region for a generation. The opportunity to create a piece of infrastructure that connects two thriving communities, that has the opportunity to positively influence health, and to center environmental justice and equity cannot be overstated.

Health Impact Assessments

Health impact assessments (HIA) have been used around the world to help decision makers better understand impacts of proposed project, policies, and plans in a multidisciplinary process. They can help draw connections and demonstrate how "non-health sectors' activities play a major role in determining health outcomes."[19] Historically, they have focused on "ensuring threats to human health are considered as part of regulatory [processes]" but have since expanded to include additional information about environmental health, health equity, and social determinants of health.[19] Many have pointed to health impact assessments to fill the gap in federal processes such as the National Environmental Protection Act (NEPA) that do not explicitly require the assessment of human health impacts of proposed projects.[20] "Those concerned with health equity have [identified] HIA as an intervention that can address health inequities in policy development and planning, that is, before inequalities come about."[19]

Health impact assessments comprise a systematic, yet flexible, process that follows a standard six steps of screening, scoping, assessment, recommendations, reporting, and monitoring & evaluation. It also involves robust community engagement at every step of the process. Community engagement and feedback from partners "has consistently been described as a core element of HIA practice and should be considered essential to it."[21(p46)]

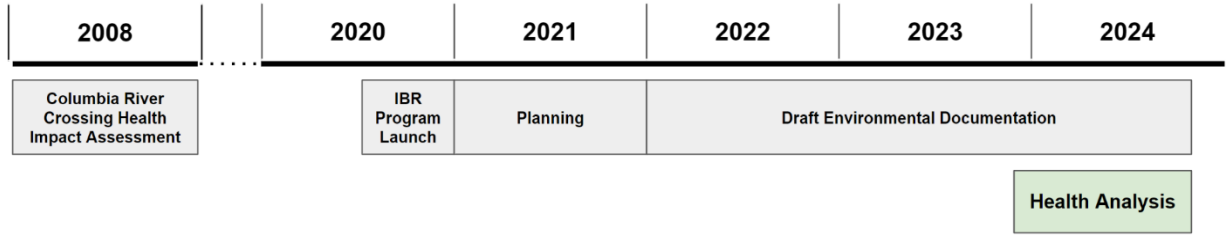
Introduction to Interstate Bridge Replacement Program & Health Analysis

When the state and local government partners sponsoring the Interstate Bridge Replacement (IBR) Program identified a Modified Locally Preferred Alternative (LPA) to replace the Interstate 5 bridge between Oregon and Washington states, several partners requested a Health Impact Assessment (HIA). An HIA had previously been conducted in 2008 during the Columbia River Crossing program.[22] (Accessible at https://www.pewtrusts.org/~/media/Assets/2008/06/HIAReport15ColumbiaRiverCrossing.pdf.)

In late 2023 the IBR Program contacted public health authorities to request that they prepare an HIA. The Washington State Department of Health, which houses an HIA program, agreed to convene the Oregon Health Authority, Clark County Public Health, and Multnomah County Health Department to develop a feasible approach to assessing bridge replacement's health impacts.

These health agencies formed a health analysis working group and began meeting in January 2024 (Figure 1). This report will refer to that group as "the working group", and use "we" and "our" to discuss our analysis and recommendations throughout.

Figure 1. High-level IBR Program and health analysis timeline



Using guidelines from the Society of Practitioners of Health Impact Assessments (SOPHIA), the working group concluded that timeline constraints did not allow for preparation of a comprehensive HIA. Health Impact Assessments require considerable time, resources, and include full community engagement at each step of the process. We estimate that an HIA would take at least two years to complete for a project of this magnitude. However, recognizing the potentially significant environmental and health impacts this project will have, the health agencies decided to prepare a Health Analysis of the IBR Program.

The Health Analysis is based heavily on standards and processes for an HIA, incorporating publicly available information and previous studies already underway for the IBR Program. Table 1 displays our adapted health analysis approach compared to a comprehensive HIA. Washington Department of Health and Oregon Health Authority followed their respective state policies and offered formal consultation to federally recognized Native American Tribes for the Health Analysis independent of IBR Program Tribal consultation. The Cowlitz Indian Tribe Health and Human Services joined as a member of the working group in April 2024. The working group completed the health analysis independently from the IBR program and we are submitting this report as a public comment on the Draft Supplement Environmental Impact Statement.

Table 1. Comparison of traditional health impact assessment and health analysis of IBR Program

Health Impact Assessment Step	Comprehensive Health Impact Assessment	Adapted Health Analysis Approach used to assess IBR Program Modified LPA
Screening	Determining feasibility and value-add of assessment for decision-making process.	The assessment was requested by the IBR Program and local partners.
Scoping	Create a work plan, key impacts to study, and determine methods for engagement and assessment.	• Health impacts identified through literature review • Community engagement not feasible within timeline
Assessment	Establish existing conditions for a baseline profile and evaluate the magnitude and direction of potential impacts.	• Emphasis on effects of Modified LPA versus no build alternative • Impacts evaluated using NEPA technical documents, systematic reviews, and existing data
Recommendations	Develop recommendations to improve health and mitigate harm.	Informed by assessment findings and priorities previously identified by project advisory groups
Reporting	Communicate results.	Posted an executive summary 10/15 on Washington DOH website. Submitting a full health analysis report to IBR Program as public comment.
Monitoring and Evaluation	Track how the assessment influences the decision-making process, if information is used, and if health outcomes improve.	Recommendations include continued integration of public health staff into ongoing IBR Program operations to support implementation and monitoring.

The goals of the Health Analysis are to:

- Identify health impacts of the IBR Program as detailed by the DSEIS.
- Provide and support adoption of evidence-based recommendations to support positive health impacts, reduce health disparities, and mitigate harm
- Leverage existing community engagement and advisory opportunities for Clark County, Multnomah County and the IBR program to incorporate community voice in decision-making
- Incorporate local health data into ongoing efforts to map and address equity and climate priorities for the IBR program.
- Engage public health and tribal partners for future decision-making phases of the IBR program

Health Analysis Methods

The working group completed the health analysis in three phases: scoping, assessment, and recommendations, detailed below. Additional details about our methods, including data sources, are available in Appendix A.

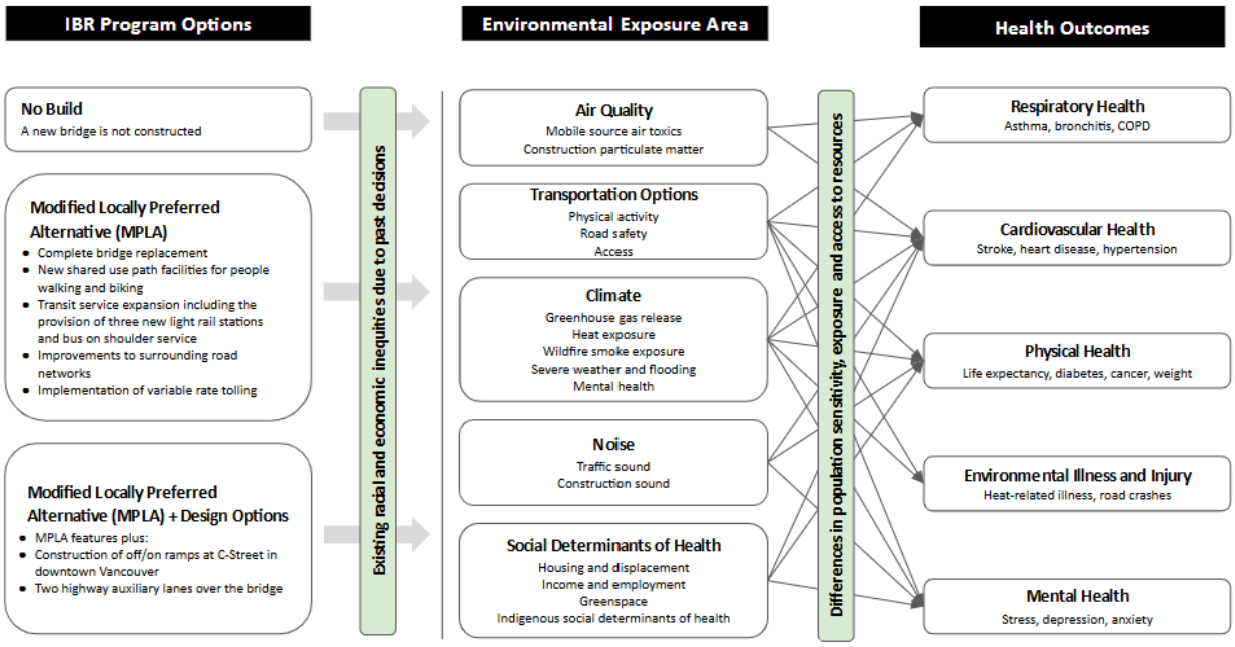
Scoping

The working group selected priority topic areas for assessment per SOPHIA guidelines for scoping. The topics include **air quality, transportation and active transportation, climate change and health, noise, social determinants of health, and water quality**.

As public health professionals, it is our mission to protect and enhance the health of the people in our states and counties. This health analysis assesses potential health impacts of the Modified LPA and does not propose an alternative.

Figure 2 outlines a health pathway diagram that links IBR program elements, focus exposure areas within the health analysis, and related health outcomes. The diagram emphasizes the role of past decisions in creating present health inequities, and how differences in population sensitivity and access to resources similarly influences prevalence of diseases and injury amongst different groups.

Figure 2. IBR Program Health Analysis Health Pathway Diagram



Assessment

The working group reviewed readily available information to examine the potential health effects of the Modified LPA – including environmental justice and health equity concerns. The following sources informed potential outcomes in each topic area:

- **Literature review.** The working group established a baseline of knowledge on each topic area from a scan of peer-reviewed literature, relying on systematic reviews and meta-analysis as a benchmark for strong evidence.
- **Readily available public data.** The working group used primarily the CDC Environmental Justice Index, CDC PLACES, CDC Social Vulnerability Index, and Census data to contextualize local health and environmental justice conditions. The working group chose these data sources based on the following factors: a) widely used and best available evidence-base from authoritative bodies that incorporate validation and rigorous review in publication, b) publicly available and readily accessible, c) comparable across Oregon and Washington, d) include data indicators that are commonly used in health analysis topic areas, and e) when possible, are place-specific and include data by census tract.
- **Draft DSEIS technical reports.** The working group reviewed select draft technical reports from the DSEIS prepared in February 2024 and cross-checked details with the DSEIS published in September 2024.
- **IBR Program Advisory Group Presentations.** Throughout the assessment stage, the working group attended the IBR Equity Advisory Group, Community Benefits Advisory Group, and Community Advisory Group meetings in July and August 2024 to present an overview of the health analysis. This provided an opportunity for the working group to ground the scope of the health analysis topic areas and for IBR advisory group members to highlight health priorities. The working group also presented an overview of the health analysis to the IBR Program Manager Group in May 2024.
- **IBR Program Site Visit.** The working group attended a half-day site tour with IBR program staff in July 2024 to visit key locations in Clark and Multnomah counties that would be affected by the Modified LPA and discuss potential effects.
- **Documentation from IBR Program Advisory Groups.** The health analysis honors the previous work that community members have contributed to the project, and uplifts recommendations documented in notes from previous meetings.

The DSEIS analysis considers IBR effects in three scenarios: 1) No-Build Alternative (no new bridge constructed) 2) Construction Modified LPA, and 3) Construction of the Modified LPA with design options incorporated that include C-Street ramps and two auxiliary lanes across the bridge (Table 2). The health analysis considers health effects from implementation between these three scenarios as data allows.

Table 2. Interstate Bridge Replacement Program implementation options

No-Build Alternative	Modified LPA	Modified LPA Design Options
No new bridge constructed	● Complete bridge replacement ● New shared use path facilities for people walking and biking ● Transit service expansion including the provision of three new light rail stations and bus on shoulder service ● Improvements to surrounding road networks ● Implementation of variable rate tolling	● Modified LPA elements plus: ● Construction of off/on ramps at C-Street in downtown Vancouver ● Two highway auxiliary lanes over the bridge

Recommendations

The assessment informed evidence-based recommendations for the IBR Program and state and local agencies sponsoring the bridge replacement to take into consideration in constructing the new bridge and associated interchange replacements. This health analysis assesses potential health impacts of the Modified LPA and does not propose an alternative.

To reduce negative health impacts and maximize health benefits of the IBR Program, we recommend decision makers design, construct, and maintain a program that prioritizes human health and safety, ecological health, and environmental justice.

Limitations

The most important limitation to note is that this version of the analysis is based on information available to local health agencies as of August 2024, primarily from the DSEIS. In many cases, the DSEIS does not include sufficient information to determine the magnitude, severity, or distribution of potential health impacts. For some pathways, a slight error in foundational assumptions about the project or quantitative models could reverse the *direction* of impacts (i.e., a health harm versus a health benefit).

The working group completed this health analysis on an accelerated timeline, making our best effort to assess potential health and health equity impacts of the IBR program in the time available (February – September 2024, with the first requested deadline of May 2024). We reviewed select technical reports to identify potential environmental health and health equity concerns and develop evidence-based recommendations for the Program.

The working group consulted subject matter experts from across our agencies to develop this report, but given the timeline, the working group had limited opportunity for extensive review. We welcome feedback and external review.

Further, we were unable to engage community fully in this process. While we received thoughtful feedback from community members and local representatives from the IBR Advisory Groups, we did not involve community at each step of the health analysis process, as is best practice for HIA. Our recommendations reflect a need for continued and enhanced community engagement by the IBR Program.

Our assessment of health topics and potential project impacts is based on literature review, readily available existing data, and review of draft DSEIS technical reports. We were unable to model potential health impacts. Our recommendations reflect a need for detailed modeling to better understand how air quality, transportation, and noise impacts by the IBR Program may affect communities.

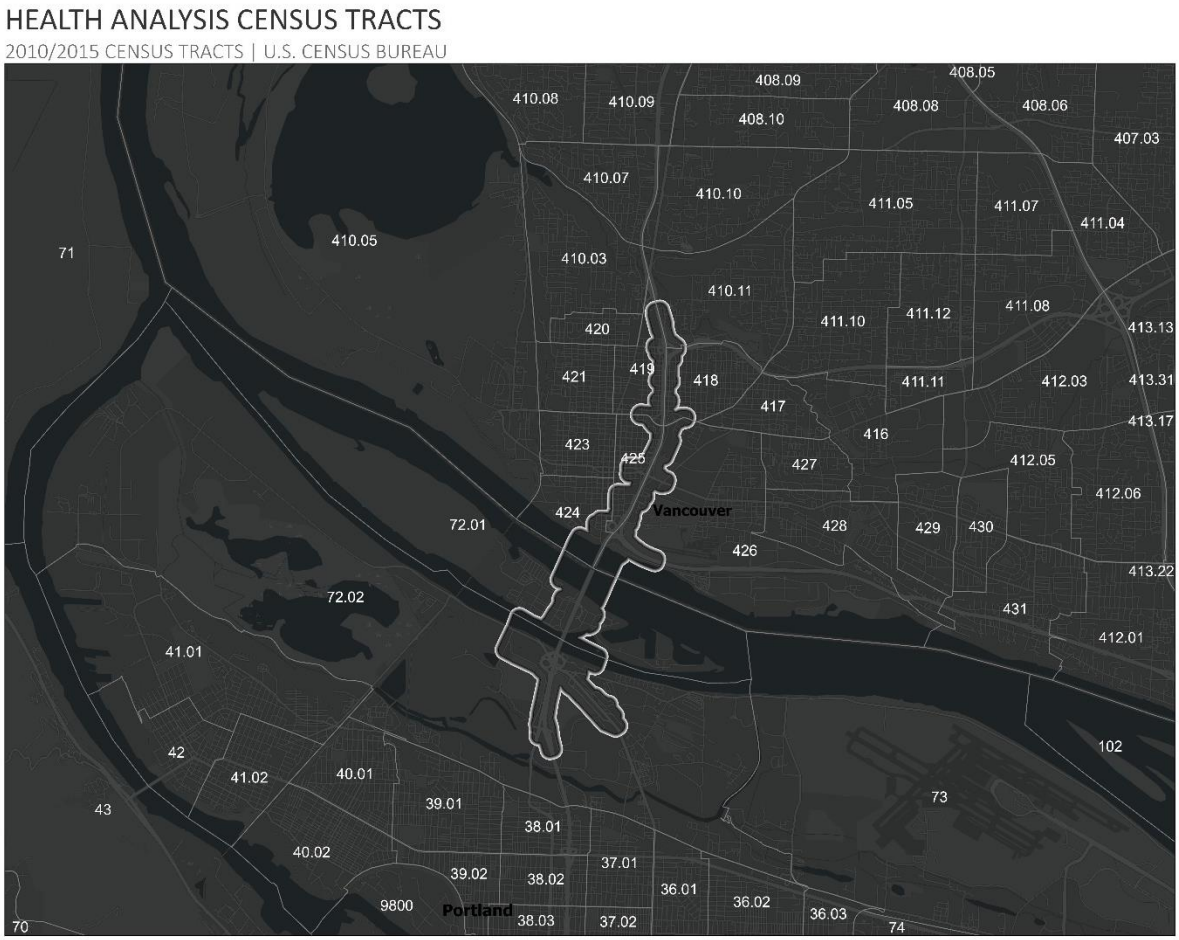
Some readily available existing data sources used in this assessment were only available by region, county, or census tract. Therefore, we were unable to draw more specific conclusions for some topics about communities most impacted and potential health impacts on a more granular scale (e.g., block or block group level).

Project Area Context

Geography

In this analysis, the IBR Project Area was defined as census tracts that overlap with the IBR Project boundaries, which include census tracts 410.11, 418, 419, 424, 425, and 426 in Washington, and 72.01 and 72.02 in Oregon (Figure 3, 2010/2015 Census). When census tract-level data was available, we summarized/averaged estimates for these 8 census tracts in the IBR Project Area to compare to Clark and Multnomah counties overall. Some data utilized the 2020 Census and is denoted in this report. Data available at the county-level only is also included.

Figure 3. Census tracts included in the project area and health analysis



Demographics and Social Factors

Tables 3 and 4 include demographic and socioeconomic data for the IBR Study Area, compared with Clark and Multnomah counties.

Table 3. Demographics in IBR Study Area, Clark County, and Multnomah County. Source: CDC EJI[23]

Indicator	IBR Study Area	Clark County	Multnomah County
Population	26,611	504,091	808,098
Percent CoC	26%	22%	29%
Percent <17	14%	24%	18%
Percent 65+	18%	15%	13%
Percent w disability	20%	13%	12%
Percent with limited English proficiency (LEP)	1.4%	2.6%	4.1%

Table 4. Socioeconomic factors in IBR Study Area, Clark County, and Multnomah County. Source: CDC EJI[23]

Indicator	IBR Study Area	Clark County	Multnomah County
Percent below 200% poverty	33%	25%	28%
Percent households that make less than 75K	34%	28%	33%
Percent who are uninsured	7.4%	5.9%	6.5%
Percent unemployment	5.3%	4.8%	4.8%

Health Outcomes

Table 5 includes select health topics and outcomes related to health analysis topic areas, and compares these estimates in the IBR Study Area to Clark and Multnomah counties overall.

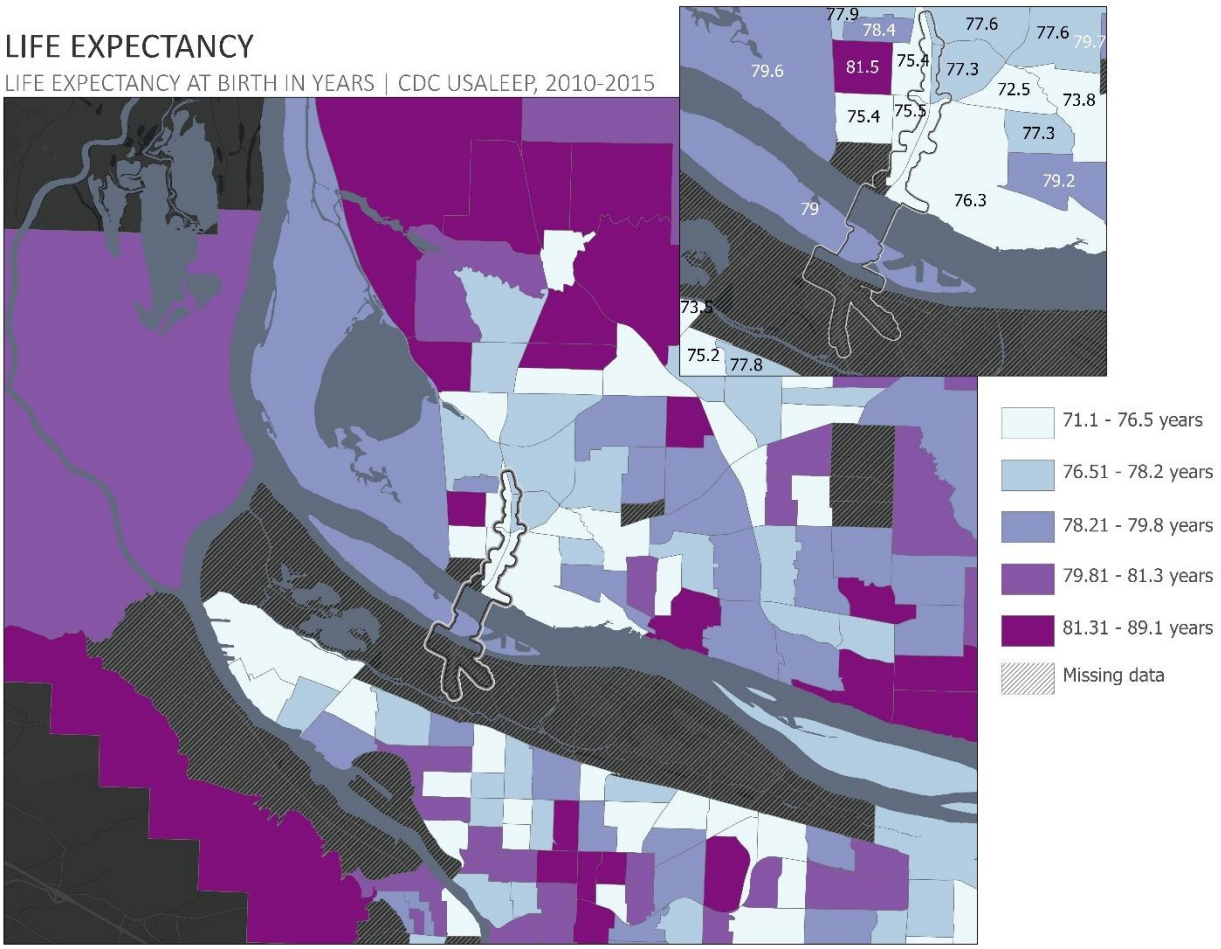
Table 5. Health Indicators[*] Related to Health Analysis Topic Areas in IBR Study Area, Clark County, and Multnomah County. Sources: CDC EJI[+23], CDC PLACES[^24]

Indicator	IBR Study Area Average Crude Prevalence (%)	Clark County Average Crude Prevalence (%)	Multnomah County Average Crude Prevalence (%)
Physical Inactivity[^]	18.7%	17.2%	17.1%
Asthma[+]	10%	10%	11%
High Blood Pressure[+]	30%	29%	26%
Cancer[+]	6.9%	6.7%	6.1%
Reported Poor Mental Health[+]	14%	13%	14%
Diabetes[+]	9.8%	8.8%	8.4%

*Estimates are crude – meaning they do not account for age

Life expectancy at birth is an indicator of mortality widely used in public health. Figure 4 displays life expectancy at birth estimates from 2010-2015 by census tract surrounding the IBR project area.[25] Life expectancy data for census tracts 424 and 72.02 are missing from this dataset. Figure 4 shows life expectancy in census tracts that overlap with the IBR project area are in the middle-to-lower ranges among life expectancy in Clark and Multnomah counties. Census tract 72.01 has the highest life expectancy in the IBR project area, at 79 years, while census tracts 419 and 425 are within the lower range around 75 years.

Figure 4. Life Expectancy at Birth (years) around IBR Project Area



Environmental Justice Context

Redlining, the discriminatory practice of lending based on a neighborhood desirability score largely dependent on race and income, was used in Portland in the 1930s.[26,27] There is evidence that banks continued with this practice through the 1990s, and redlining reinforced disparities in intergenerational wealth in Multnomah County.[28] Parts of the Kenton neighborhood, in the southern part of the IBR Program study area, were classified as “definitely declining” on maps created by the Home Owners Loan Corporation in the 1930s.[28] A similar map was not created for Vancouver, though the Racial Restrictive Covenants Project identified several properties that had racial restrictions in neighborhoods in the project area: West Minnehaha, Lincoln, Rose Village, and Central Park.[29] There is a significant association with the neighborhood desirability score (A [best] - D [hazardous]) and pedestrian fatalities, the result of decades of underinvestment in infrastructure.[30]

Those racist housing practices contributed to Portland's Black community primarily residing in the Albina neighborhood.[31] Vanport, developed as a temporary neighborhood to house shipyard workers and families, was also one of Portland's most diverse neighborhoods. Both Albina and Vanport serve as examples of built environment decision making disproportionately harming communities of color and low-income communities. The Columbia River flooded Vanport in 1948, displacing more than 18,000 residents, a third of whom were Black. Many relocated to Albina in the absence of other options in a heavily segregated Portland. The construction of I-5 and the Memorial Coliseum in the 1950s through '70s displaced hundreds of Abina families and bisected the neighborhood, cutting off connections from East to West.[31,32]

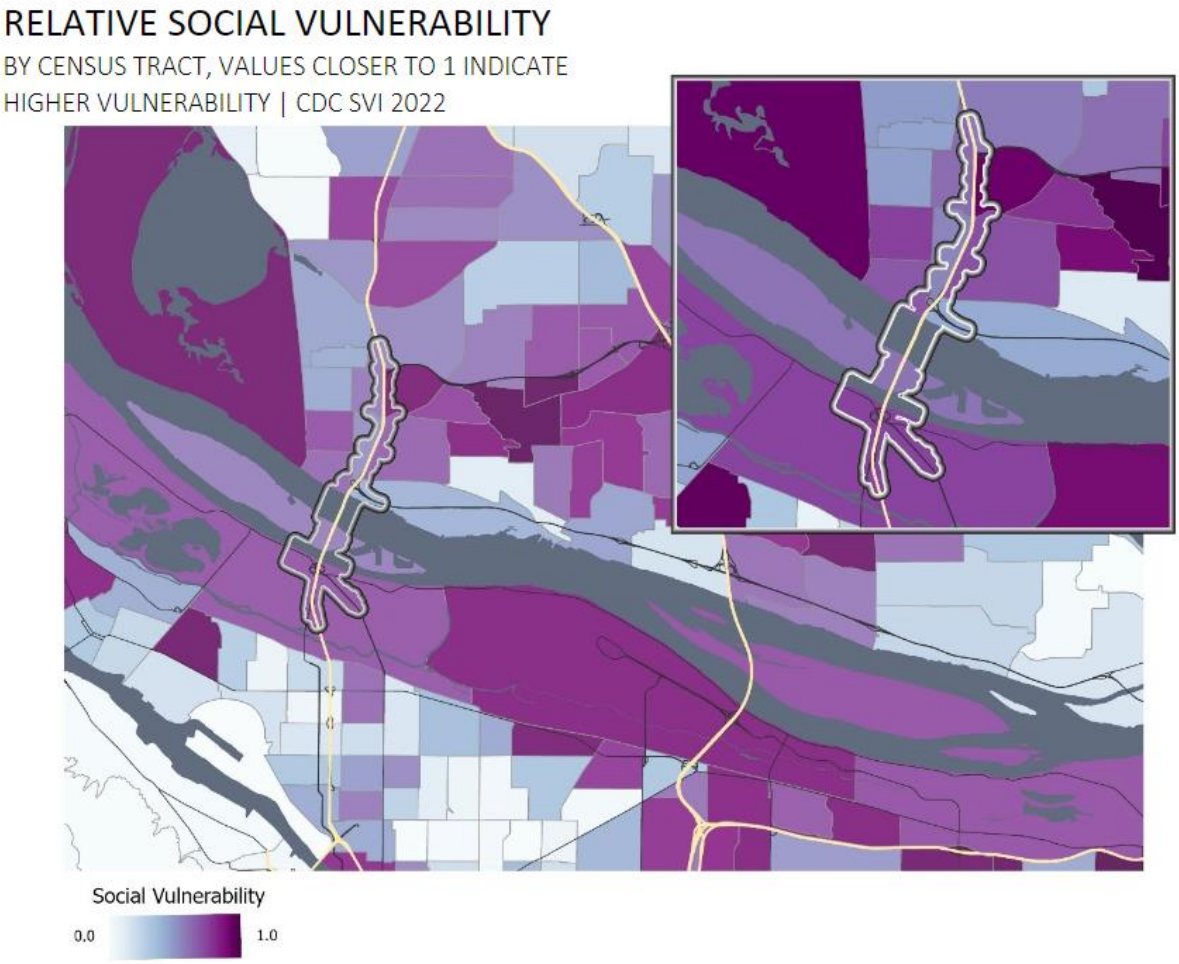
While Albina is outside of the IBR Program area, lessons from these harmful built environment decisions of the past remain relevant and valuable to decisions that will shape this once-in-a-generation project. The IBR Program has the potential to either further harm or mitigate additional harm by equitably distributing benefits to residents across the program area.

CDC's Social Vulnerability Index (SVI)(Figure 5) "indicates the relative vulnerability of every U.S. census tract".[33] This metric accounts for 16 different demographic factors, including poverty status, educational attainment, and racial and ethnic minority status. This index includes factors similar to those considered in the IBR Program's definition of "equity priority communities," though it does contain more information on housing-related indicators. The full list of variables includes socioeconomic status (below 150% poverty, unemployed, housing cost burden, no high school diploma, no health insurance), household characteristics (aged 65 and older, aged 17 and younger, civilian with a disability, single-parent households, English Language Proficiency), racial and ethnic minority status, and housing type and transportation (multi-unit structures, mobile homes, crowding, no vehicle, group quarters).

A note on language

In census and other federal or state data, racial and ethnic demographic data often are reported in lumped groups, using terms like "minority populations." Even the acronym "BIPOC" reflects a grouping of multiple different racial and ethnic identities that are unique. Use of the phrase "minority populations" throughout this report is reflective of language in our source material, including DSEIS documents and census data.

Figure 5: Relative social vulnerability in program area based on CDC Social Vulnerability Index. Source: CDC SVI 2022[33]



Notably, all but one of the census tracts that fall within IBR's defined project area are contained in the most vulnerable half of census tracts in their respective states. Census tract 418, containing the Rose Village neighborhood of Vancouver, is the census tract with the highest overall relative vulnerability anywhere in the project area.

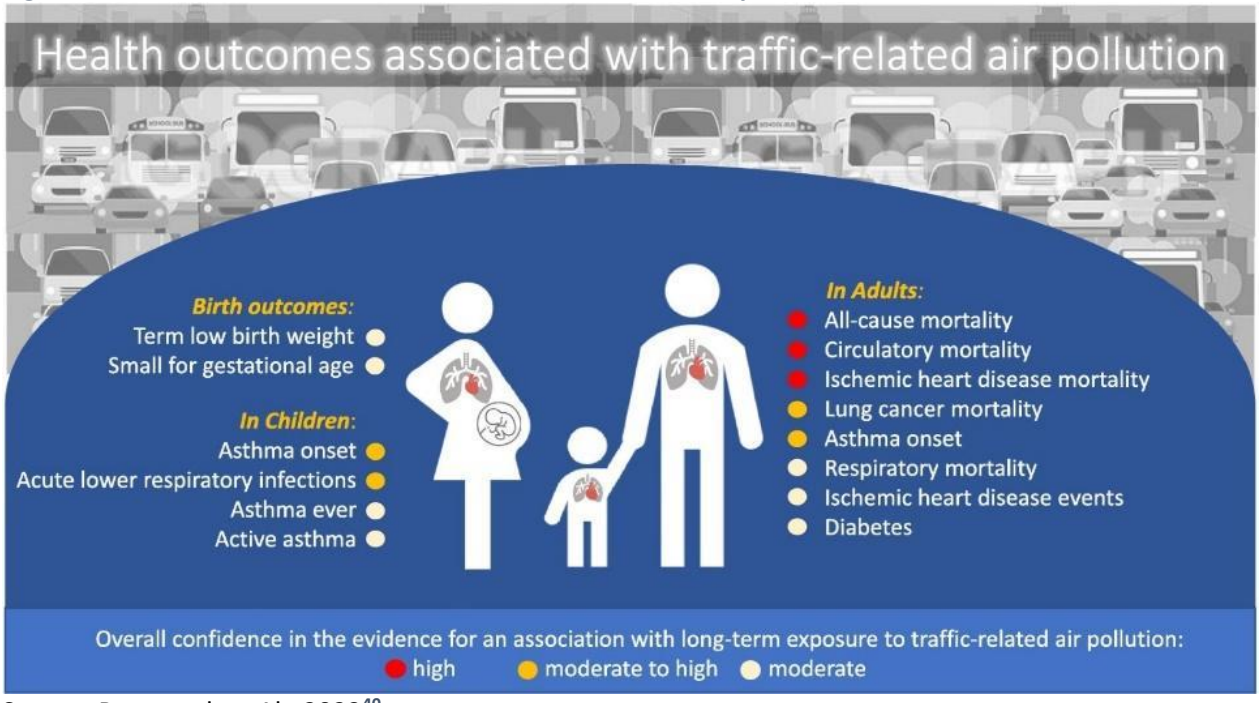
Assessment

Air Quality

Literature Review

Transportation is a significant contributor to air pollution-related illness and premature death. Emissions from vehicles include carbon monoxide, nitrogen oxides, and particulate matter. Exposure to traffic-related air pollution can lead to respiratory, cardiovascular, neurodegenerative, and metabolic diseases, as well as cancer and reproductive issues.[34–36] On-road diesel vehicles are a major source of these pollutants and have been shown to have the largest contribution to the health burdens of traffic-related $PM_{2.5}$ and ozone pollution.[37] The health impacts of carbonaceous traffic-related air pollutants, such as particulate matter (e.g., PM 2.5) and volatile organic compounds, are a particular concern in urban areas.[38] Road traffic pollutants like nitrogen dioxide, carbon monoxide, and elemental carbons can also have detrimental effects on human health and the environment.[39,40]

Figure 6. Health outcomes associated with traffic-related air pollution



Source: Boogaard et. Al., 2022[40]

Exposure to traffic-related air pollution has negative health impacts on children, adults, and pregnant people.[40] Higher rates of asthma exacerbation and onset in both children and adults are associated with exposure to traffic-related air pollution. [40] The CDC estimates that asthma costs the United States roughly $80 billion a year due to medical costs, days missed from school and work, and deaths.[41] These pollutants also increase risk of all-cause mortality, circulatory mortality, lung cancer mortality, and ischemic heart disease mortality.[40] Additionally, poor air quality is associated with respiratory issues, heart attacks, absences from work and school, lung cancer, and declines in cognitive development for children.[42,43]

The use of electric and hybrid fuel vehicles and transportation demand policies can help mitigate health concerns associated with traffic-related air pollution in areas where they are used.[44,45] However, TRAP reductions associated with electric and hybrid fuel vehicles may not be distributed evenly, as research suggests that relative reductions in TRAPs are lower for disadvantaged communities than in non-disadvantaged communities due substantially higher baseline concentrations.[46] Despite advancements in emission reduction technologies, the total number of vehicle miles traveled (VMT) and number of vehicles on roads continue to increase around the world, potentially counteracting any potential benefits resulting from emission reduction advancements.[36,47] Instead, researchers have estimated that prioritizing improvements to public transit, freight policies and passenger car efficiency, along with shifting away from single occupancy vehicles, could result in the removal of an estimated 2.8 GT of greenhouse gases from cities around the world by 2050.[36,48]

Local Context

While traffic-related air pollution in the project area is a concern, it is one of many sources that impacts the air quality for residents. The IBR Program includes areas proximate to the Port of Vancouver, Pearson Field, Portland International Airport, BNSF railway terminal, and active railways. As climate change contributes to increasing average maximum and minimum temperatures throughout Oregon and Washington[49], the physical and mental health impacts of poor air quality will continue to increase. Wildfires occurring more frequently and for longer durations will exacerbate poor air quality in the region. *(For more information about climate change and health, see the Climate and Health section.)*

Combining the impact of existing sources of air pollution in the Program area, as well as the increasing days of poor air quality from wildfires, contributes to the cumulative health impacts on an individual and community.

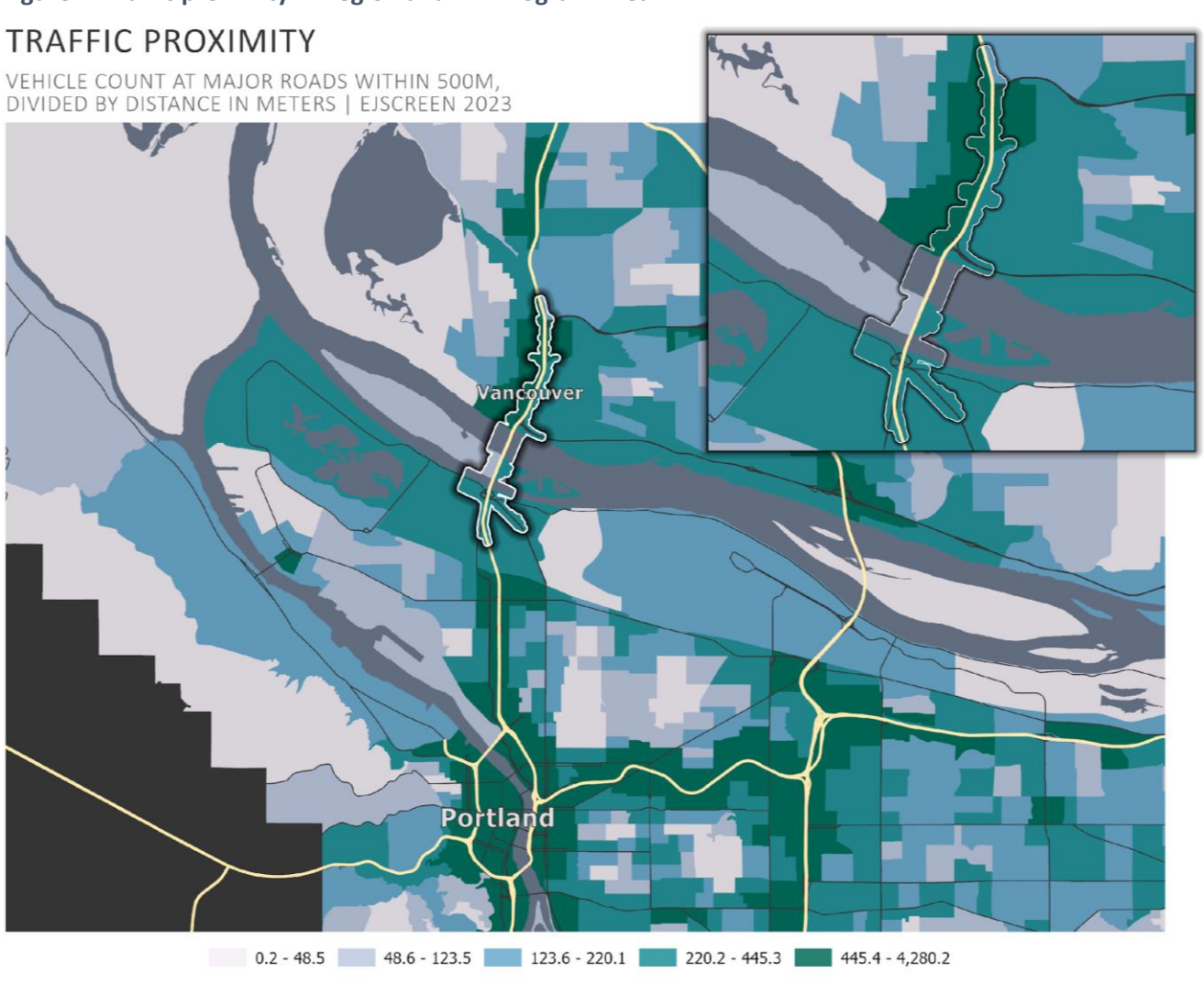
Within the IBR project area, 10% of adults have asthma, 30% have high blood pressure, 14% are children, and 18% are over 65 years old (Tables 3 & 5).[23] According to the Washington State Department of Ecology, Vancouver is identified as "overburdened and experiences high levels of PM2.5".[50] These baseline health conditions of residents in the project area could be further impacted negatively by poor air quality. The average estimated cancer risk from mobile sources of air toxics in the IBR study area is 2.6 cases per million (Table 6).

Table 6. Cancer Risk from Mobile Sources of Air Toxics (Modeled Estimates in Cases per Million). Source: EPA 2020 AirToxScreen[51]

IBR Study Area	Clark County	Multnomah County
2.6 (1.9 - 4.2)	2.0 (0.4 - 3.1)	3.4 (0.4 - 5.7)

The I-5 interstate bridge is an existing contributor to poor air quality, making it a public health hazard for those who live nearby. The air quality analysis presented in the *DSEIS Air Quality Technical Report* suggests that there would not be significant differences in air quality impacts between the Modified Locally Preferred Alternative (LPA) and the No-Build Alternative (NBA) scenarios.[52] However, the air quality analysis in the DSEIS uses a large study area composed of Clackamas, Clark, Multnomah, and Washington counties. Due to this large study area and lack of modeling at a smaller geographic level, it is unclear whether the Modified LPA and NBA scenarios will contribute to improved or worsened local air quality conditions within the project area. Given the existing high traffic volumes along the I-5 interstate bridge, people who live nearby are subjected to greater concentrations of air toxics and are at risk of experiencing additional air quality burdens given the expected 33% increase in VMT under the Modified LPA by 2045.

Figure 7. Traffic proximity in Region and IBR Program Area



Potential Project Impacts

Project Design

The DSEIS states that concentration of air toxics from mobile sources would likely be more pronounced on road segments where traffic volumes would increase under the Modified LPA compared to the No Build Alternative due to diversion to avoid tolls. However, many of these road segments were not included in the air quality analysis conducted by the IBR team. These streets where traffic volumes are projected to increase due to diversion are not easily identified in the DSEIS. The DSEIS states that their analysis of localized health impacts due to air quality changes cannot reliably quantify the duration and magnitude of project-specific increases in air toxics and related health impacts due to uncertainties in the available data. This gap in the data is the basis for a recommendation for more detailed air quality modeling and monitoring in the project area.

Project Construction and Demolition

Construction of the Modified LPA would generate heightened amounts of particulate matter including dust from demolition and preparation and emissions from trucks and construction equipment. The DSEIS *Air Quality Technical Report* describes increase in particulate matter "in the form of fugitive dust, (from demolition, ground clearing and preparation, grading, stockpiling of materials, on-site movement of equipment, and transportation of construction materials), as well as exhaust emissions from material delivery trucks, construction equipment, and workers' private vehicles".[52(p5-1)] It also states that "elevated emissions would likely occur immediately adjacent to the construction activities, staging areas, and material hauling routes". [52(p5-1)] Furthermore, air quality impacts from construction would result in long-term exposure as construction activities would occur during a 9- to 15-year period. At this phase of the planning process, the IBR Program has not developed detailed construction sequencing plans.

There is insufficient information in the DSEIS to show how much of an increase in particulate matter and fugitive dust will contribute to negative impacts on air quality. A comparison is made between this project and the Dan Ryan Expressway in Chicago, where air quality monitoring was done prior to and during construction. It was found with that project, that "the number of times the project action levels were exceeded was low".[52(p5-2)] While a comparison can be helpful, there are still concerns and more clear information needed regarding this project about the specific air quality impacts. Additionally, the DSEIS references the construction of the Dan Ryan Expressway from January 2005 through October 2007, which is a significantly smaller time frame of construction than the IBR Program.[52(p5-2)]

Due to the increased risk from air pollution to children and older adults, construction plans should be made to mitigate impacts to the schools, elder care facilities, and health care facilities. Construction staging and idling vehicles should not occur near those sites. Changes in traffic volume and proximity to residents could change an area from a low pollution area to a high pollution area and increase health risks. A detailed construction plan should also include traffic diversion information and assess the risk of current low traffic areas of becoming high traffic areas during construction. Residents should be made aware of all construction activity, duration, and mitigation measures being taken. Our recommendations reflect the need for more detailed information about air quality impacts and mitigation during construction.

As noted above, demolition will contribute to fugitive dust and negatively impact air quality. An additional concern in addition to the amount of particulate matter released from demolition is the content of the fugitive dust. The DSEIS *Air Quality Technical Report* describes that other than compliance with the EPA's National Ambient Air Quality Standards, there are no specific air quality regulations "governing emission of lead from demolition activities during construction" and that "control of potential lead emission is addressed in the construction contracts".[52(p2-8)] The DSEIS *Hazardous Materials Technical Report* states that the existing Interstate Bridge, and any other structures, that contain lead or asbestos will go through proper abatement prior to demolition.[53(p5-11)] Due to the potential public health, worker health, and ecological impacts of lead dust getting into the air, and settling on soil or water surfaces, more information about mitigation and lead abatement would help assess the likelihood of exposure.

Long-Term Impacts

The DSEIS projects that the Modified LPA would result in a 33% increase in vehicle miles traveled (VMT) by 2045 compared to the 2015 baseline.[52] Despite projected increases in VMT for both the NBA and Modified LPA, the EPA's Motor Vehicle Emissions Simulator (MOVES) model used in the DSEIS resulted in expected reductions in mobile source air toxics (MSAT) emissions by 2045 largely due to incorporation of emission reduction standards from the 2007 EPA Control of Hazardous Air Pollutants from Mobile Sources. This 2007 ruling from the EPA set annual standards for reducing MSATs. Beginning in 2011, the EPA requires fuel refiners and importers to meet benzene reduction stands and vehicle manufacturers to meet non-methane hydrocarbon exhaust emissions standards.[54] The MOVES model used in the DSEIS assumes that fuel and vehicle standards set by this 2007 EPA ruling will be met in 2045, resulting in substantial MSAT reductions compared to existing conditions primarily due to use of cleaner fuels and engines rather than design differences between the NBA and Modified LPA. These assumptions included in the MOVES model, combined with the large geographic scale of this analysis and its output in tons per year, does not provide adequate information for determining possible health impacts associated with the Modified LPA.

According to the DSEIS *Transportation Chapter*, "approximately 14,000 heavy and medium trucks crossed the Interstate Bridge on an average weekday in 2019, accounting for approximately 10% of all bridge traffic".[55(p3.1-8)] Additionally, the Washington State Freight System Plan anticipates that "forecasted truck vehicle miles traveled on the various interstates are expected to increase by 67 percent from 2022 to 2050".[56(p48)] An increase in freight traffic volumes could increase air quality related health concerns, especially for people walking, biking, and rolling on active transportation paths in the vicinity of traffic and freight emissions, housed and unhoused people living nearby, and future housing developments.

From the analysis performed in the DSEIS, the IBR Program concludes that emissions under the No-Build Alternative and the Modified LPA are expected to be substantially lower than emissions under existing conditions. The model predicting emissions in 2045, however, shows negligible difference in predicted emissions the NBA and Modified LPA. These expected decreases in emissions for the Modified LPA also rely on meeting the mode share targets included in the analysis (e.g., people choosing to commute via ride light rail instead of single-occupancy vehicles. The air quality analysis presented in the DSEIS is limited to a select number of road segments within the project area and evaluates air quality impacts for the area as a whole, rather than by each segment.

Environmental Justice & Health Equity

According to the DSEIS, the IBR Program focus area includes five healthcare facilities, six schools, and six assisted living facilities, all of which contain people who are especially susceptible to the health impacts of poor air quality.

While research suggests that the ambient concentrations of air toxics exceed cancer risk benchmarks throughout the country, BIPOC communities and people with lower income experience a disproportionate risk of exposure to these air toxics. This is a result of historic and ongoing sociopolitical factors like residential segregation, uneven industrial development, and neighborhood disinvestment.[57,58]

Research suggests that poor air quality often has a disproportionate health impact for low-income populations and BIPOC communities.[59] Disparities in traffic-related air pollution exposure are larger by race/ethnicity than income and disproportionate to contributions to overall pollution concentrations between different racial/ethnic populations.[36] Uneven tree canopy and vegetative cover further exacerbate the inequitable burden of air pollution and its impact on cardiorespiratory health. Tree canopy and vegetation have been shown to reduce respiratory difficulties[60] by controlling the flow and distribution of air pollutants.[61]

Transportation and Active Transportation

Physical Activity and Health

Literature Review

The development patterns of neighborhoods and cities shapes the travel options that are available to residents, and how feasible it is to walk, bike, roll, take transit, or drive to essential, everyday destinations. Urban planning decisions and design features influence travel options, like the availability and connectedness of sidewalks and bike lanes, mix of land uses, neighborhood density, proximity of recreational and open spaces, design variety and aesthetics, and proximity and access to transit and employment. Improvements in these areas can lead to increases in physical activity.[62,63]

In contrast, urban planning decisions can also discourage active travel. Induced demand is a well-studied concept in transportation infrastructure that describes how when highways expand to include more lanes (supply), traffic increases to use those lanes (demand).[64,65] Induced demand is associated with increased vehicle miles traveled, which in turn has negative effects on physical activity and air quality.[66]

Physical activity improves a wide range of health outcomes across the lifespan. When community design makes active travel safe, feasible, and attractive, physical activity can become an easy option for everyone in their everyday life. Health benefits include improvements in mental health and cognition, stronger bones and muscles, and reduced risk of all-cause mortality, cardiovascular disease, type II diabetes, and several types of cancer.[67,68] Inversely, sedentarism is associated with increases in all-cause mortality, metabolic syndrome, obesity, and unhealthy cardiometabolic biomarkers.[69]

A review of health impact assessments evaluating health benefits and risk from shifting from car travel to active travel found a majority of studies (27/30) determined the benefits outweighed risks.[70] Benefits were primarily driven by increases in physical activity, and include a wide range of outcomes, including improvements in all-cause mortality, cardiovascular disease, stroke, type 2 diabetes, cancer, dementia, depression, life expectancy, and health care costs. The studies found the risks from traffic crash injuries and exposure to air pollution to be minor compared to benefits, though uncertainty exists for demographic subgroups.[70] Changes in physical activity and active transportation in response to changes in large scale infrastructure are highly context specific, difficult to evaluate, and therefore understudied. Existing findings are mixed. A review of physical activity effects from the implementation of new built environment infrastructure changes including traffic-free bridges, an informal boardwalk, and a cycling trail, found inconsistent changes for walking but positive effects for cycling.[71] Despite inconsistent effects in walking, the review found that closer residential proximity to the intervention area was associated with higher levels of physical activity and walking.[71]

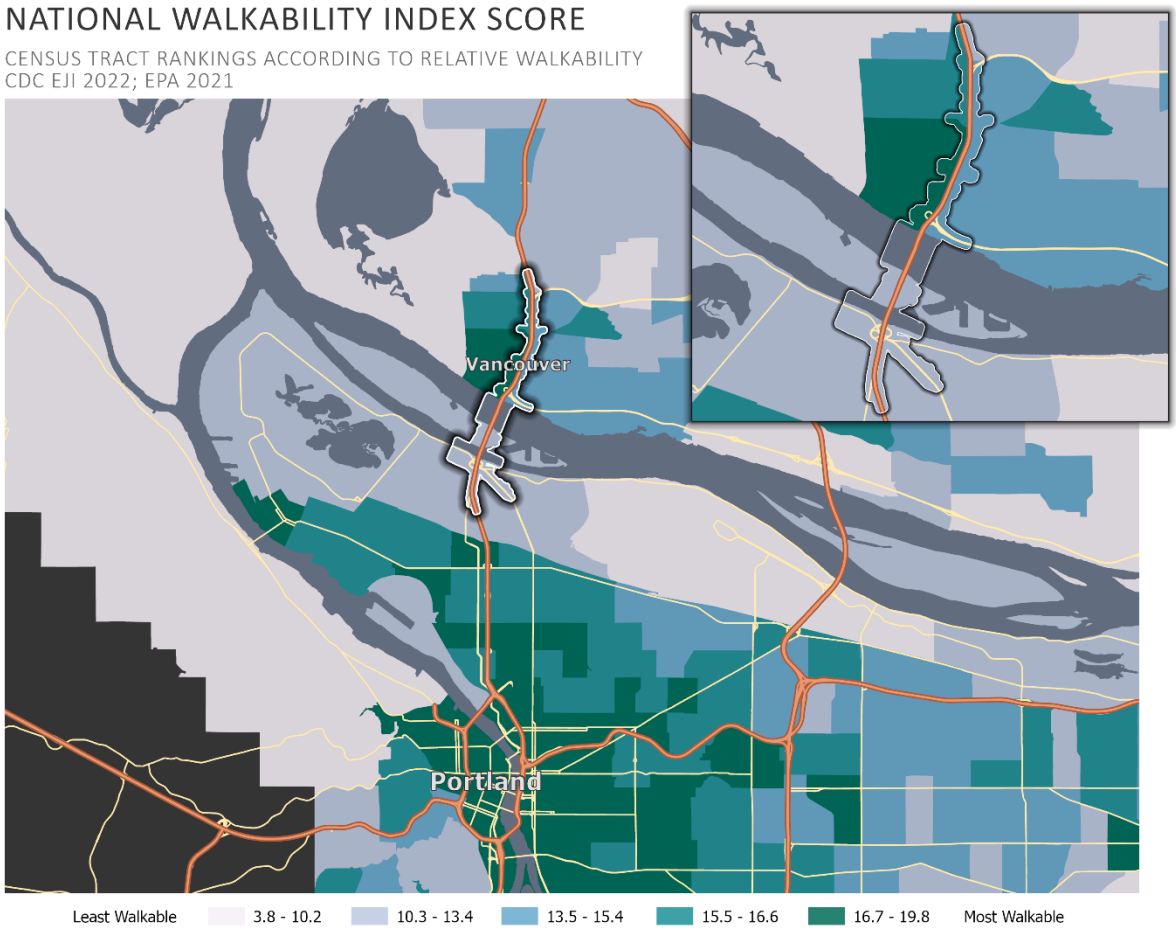
Public transit is associated with increases in physical activity, as people tend to walk or bike to transit stops and stations. A review of natural experiments evaluating the effects of new or extended bus rapid transit or light rail services found that building a new public transit line is associated with an increase of nearly 30 minutes of light to moderate physical activity a week for new users. This is one fifth of the WHO weekly physical activity recommendation.[72] A review of light rail transit effects on physical activity found that new light rail increased user weekly walking rates between 7-40%. There were limited effects on cycling rates.[73] Projects that incorporate built environment changes that affect both transportation systems, like light rail improvements, and the surrounding land use and environmental design, create places that are more welcoming and easier to navigate, which in turn increases physical activity.[74]

Local Context

Active Transportation. Approximately 2.4% of workers over the age of 16 that live in the study area walk to work, and 1.0% bike to work.[75] This proportion is greater than Clark County overall and less than Multnomah County overall. The project study area connects the downtown core of the City of Vancouver, an area with greater walkability (as identified by the EPA EJI), directly to parts of Multnomah County outside of the urban core and lower walkability (Figure 8). The IBR Program conducted a 24-hour bicycle and pedestrian count on the interstate bridge October 19th, 2022 to establish a baseline for travel modelling. The count occurred during a significant smoke event, so program staff adjusted the counts based on the upper threshold reduction percentages identified in Doubleday et al., 2021.[76] It is unclear if these assumptions in this methodology match the IBR program area context. Future analysis would benefit from active transportation counts when environmental conditions are not biasing travel choices.

The *DSEIS Transportation Technical Report* notes that existing active transportation structure is lacking in the project area. Walking and biking path networks are incomplete and often do not meet current design standards, including state, local, and ADA standards, depending on location. Multnomah County land uses in the project area, such as in the Columbia Slough watershed and industrial zones have limited the development of extensive active transportation infrastructure. The existing shared use path spanning the Interstate bridge is narrow and does not allow two-way travel or passing for people biking. I-5 presents a large barrier for people walking or biking Eastbound and Westbound in Vancouver (Section 3.8, *DSEIS Transportation Technical Report*).[77] Community members have also expressed that discrimination and racism can limit outdoor exercise and recreation for communities of color in the region.[78]

Figure 8. National Walkability Score in Region and IBR Study Area



Transit. Trimet and C-Tran provide current transit service in the study area through local, regional, and express bus service and light rail. Full descriptions of available transit service in the project area are in the *DSEIS Transportation Technical Report* section 3.7.[77] The *DSEIS Transportation Technical Report* notes that currently I-5 congestion adversely impacts transit travel times and reliability during peak morning and afternoon travel periods (Section 3.7.6).[77]

Approximately 3.5% of workers over the age of 16 that live in the study area use transit to get to work (Table 7).[75] This is a little more than double the proportion of Clark County overall and a little less than half the proportion of Multnomah County overall. The IBR Program estimates that approximately 3,200 people cross the interstate bridge via bus on a typical weekday (Table 3-28, *DSEIS Transportation Technical Report*).[77(p3-89)]

Car Travel. There are currently three lanes for cars, vans and trucks in either direction along the existing bridge spans (6 lanes total). Approximately 74.5% of commuters drive or carpool in the project study area.[75] The *DSEIS Transportation Technical Report* states that the average weekday daily traffic volume for the I-5 bridge is 143,400 vehicles (Table 3-5, *DSEIS Transportation Technical Report*).[77(p3-18)]

Table 7. Mode Split in IBR Study Area, Clark County, and Multnomah County, ACS 5-Year Estimates* 2018-2022[75]

Mode	IBR Study Area	Clark County	Multnomah County
Car – Drive Alone	67.7%	72.2%	55.1%
Car – Carpooled	5.9%	8.1%	7.8%
Public Transportation	3.6%	1.5%	7.8%
Bike	1.0%	0.3%	3.5%
Walk	2.4%	1.5%	4.5%

**2020 census tract geographies:*
Washington: 410.11, 418, 419, 424, 425, 426.01, 426.02 | Oregon: 72.01, 72.02

Travel-Related Health Outcomes. The IBR project area has slightly higher levels of physical inactivity than Clark and Multnomah County overall. The prevalence of physical activity-related health conditions in the study area, including high blood pressure, cancer, and diabetes, is slightly higher than the surrounding counties overall (Table 5). Disparities within these outcomes vary widely by age, race, ethnicity, sex, and geography.

Potential Project Impacts

Overall, the replacement of the existing I-5 bridge will result in a structure with greater seismic resilience, and minimize the risk of a bridge collapse during an earthquake. This will support continued regional travel and access during the recovery period of a seismic event. Additional effects on health vary by project stage and travel mode, as described below.

Project Long Term Impacts

Active Transportation and Health. IBR Program modeling predicts that active transportation trips will increase with the Modified LPA primarily due to the increased attractiveness of active mode facilities (80-160% increases in active trips) and mode shift from other travel means (15-25% increases in active trips). Modeled estimates predict that daily total active transportation trips could increase to 740 to 1,600 daily active transportation trips (Tables 4-49 and 4-50, *DSEIS Transportation Technical Report*).[77(p4-134)]

An increase in active transportation trips would support the improvement of health outcomes related to physical activity in the study area in the future.

Transit and Health. Using the Metro Regional Travel Model, the *DSEIS Transportation Technical Report* predicts that in 2045 there would be 29,100 transit riders using a part of the planned transit improvements scoped within the IBR Modified LPA (Table 4-40, *DSEIS Transportation Technical Report*).[77(p4-119)] The DSEIS estimates that approximately 36% (12,000) of these riders would be new transit riders that shifted from driving. A majority of transit boardings and departures would occur in Clark County at the Waterfront light-rail transit (LRT) station (24% of total predicted boardings) and Evergreen/I-5 LRT station (61% of total predicted boardings) (Table 4-39, *DSEIS Transportation Technical Report*).[77(p4-117)]

The expected increase in new riders and the addition of three new LRT stations is likely to support increases in physical activity via walking and biking to and from transit stops. This is also likely to support the improvement of health outcomes related to physical activity in the study area in the future.

Car Travel and Health. Using the Metro Regional Travel Model, the *DSEIS Transportation Technical Report* projects that traffic volumes crossing the interstate bridge in 2045 will increase regardless of current design options, ranging from 0.93%-1.07% per year.[77(p4-12)] Average weekday daily traffic volumes over I-5 are predicted to increase by 26% in the no-build scenario and 23% in MLPA option Table 8). MPLA traffic volumes are smaller due to the increased availability of transit options that would be provided and diversion resulting from tolls. The *DSEIS Transportation Technical Report* estimates that the MLPA with the addition of two auxiliary lanes would result in similar peak travel volumes. The auxiliary lanes would reduce congestion-related delays by 33% in either direction compared to the hours of congestion forecast in the MLPA without auxiliary lanes. Depending on how many lanes are in the final design, the IBR program area could experience induced demand, which would likely increase vehicle miles traveled. Our recommendations reflect the need for more appropriate modeling to identify potential health impacts, including consideration of the number of lanes in design options.

Despite the forecasted reductions in travel times for car travel, traffic volumes and vehicle miles traveled are projected to continue to increase. This will likely result in little to no change in health outcomes related to car travel, physical activity, and sedentary behavior at the population level.

Table 8. Predicted Travel Changes along I-5 in IBR Study Area by Mode, ODOT DSEIS Transportation Technical Report[77]

Mode/Metric	Existing	No-Build	Modified LPA
Car			
Average Weekday Daily Traffic Volumes *(Page 4-13, Table 4-5)*	143,400	180,000 (26% increase)	175,000 (23% increase)
Vehicle Miles Traveled	Not cited in DSEIS	436,400	424,900
Transit			
Regional Transit Mode Share *(Page 4-113, Table 4-38)*	Not cited in DSEIS	5.26%	5.37%
Weekday Corridor Daily Transit Ridership *(Page 4-119, Table 4-40)*	Not cited in DSEIS	14,900	29,100
Bike			
Daily Trips *(Page 4-134, Tables 4-49 and 4-50)*	279 (205 unadjusted)	No change	740-1,600 (combined biking and walking)
Walk			
Daily Trips *(Page 4-134, Tables 4-49 and 4-50)*	132 (91 unadjusted)	No change	740-1,600 (combined biking and walking)

Project Construction

IBR construction will affect all regional travel patterns and modes for 9 to 15 years depending on project implementation. Construction would require nighttime closures of I-5 and surrounding arterials that would result in rerouting and potential congestion and delays. The project may affect existing transit operations including alterations to existing light rail operations along the Yellow line, delays for bus routes that need to be rerouted or encounter construction-related congestion, and the relocation of bus stops in affected project areas. To the extent practical, the active transportation crossing over the bridge will remain open, but surrounding sidewalks, shared use paths, and bicycle lanes may be closed and rerouted. This may negatively affect access to employment, health care, and other needed services, especially for those that are transit dependent or do not have car access.

Environmental Justice and Health Equity

Some groups face greater or additional barriers to engaging in regular physical activity through active transportation. Fear of crime and perceived safety from other road users can influence travel choices for children/parents, older adults, and people that don't identify as male.[79,80] In Multnomah County, census tracts with higher densities of intersections, an indicator of walkability, tend to have lower shares of BIPOC residents. The same pattern exists for population percentage within ¼ mile of a bus or light rail stop.[81]

The *DSEIS Equity Technical Report* evaluated potential changes in mode shift benefits by analyzing increases in transit and driving access improvements for equity priority communities identified by the IBR Program. While the analysis found improvements across the board for program area residents, benefits were not equally (nor equitably) distributed. Transit access to jobs for BIPOC residents, communities with limited English proficiency, immigrants and refugees, and people under the age of 25 did not increase as much as it did for white, non-Hispanic residents (Table 4-2, *DSEIS Equity Technical Report*).[82(p4-3)] This indicates disparities would continue to remain, likely reinforcing disparities in opportunities for physical activity. Additionally, the *DSEIS Equity Technical Report* does not include spatial analysis of active transportation benefits within the program area for equity priority communities. Further evaluation of distribution of the benefits would inform decision-makers and community advocates in further policy or programmatic interventions are needed to reduce existing disparities.

Road Safety

Literature Review

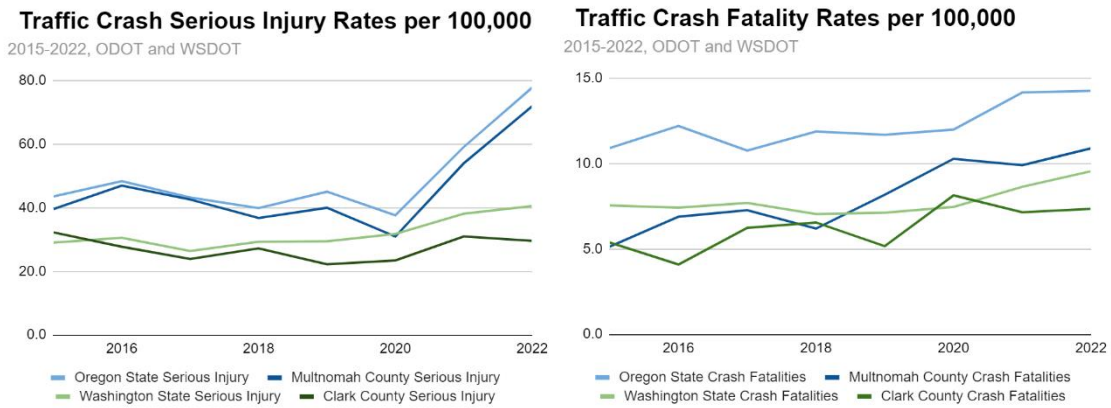
Transportation safety is a primary public health and transportation concern. Traffic crashes are a leading cause of death in the United States, and fatality rates have been increasing in recent years. Motor vehicle crashes specifically are the leading cause of death for teenagers.[83]

The Safe System approach to road safety is a multi-tier approach to improving road safety based on the fact that people make mistakes in the roadway and that humans cannot withstand the crash forces they experience from vehicles. Interventions and design principles focus on encouraging safer speeds, designing roads that encourage safer behavior, cultural shifts to promoting safety for all amongst all modes, making vehicles safer, and improving post-crash care.[84] These strategies align with core public health intervention approaches to change the context in which people operate to promote healthier actions and improve population health.[85] System-level interventions focused on safe speeds include focusing on highway design and implementing tools to encourage compliance with speed limits and manage traffic flow and density.[86]

Local Context

Locally, serious injury and fatality rates per 100,000 have been steadily increasing since 2015 (Figure 9). In 2022, there were 88 crash-related fatalities in Multnomah County and 37 in Clark County. That same year, there were 581 serious injuries related to crashes in Multnomah County, and 149 in Clark County. Since 2020, the serious injury crash rate per 100,000 has almost doubled in Multnomah County.

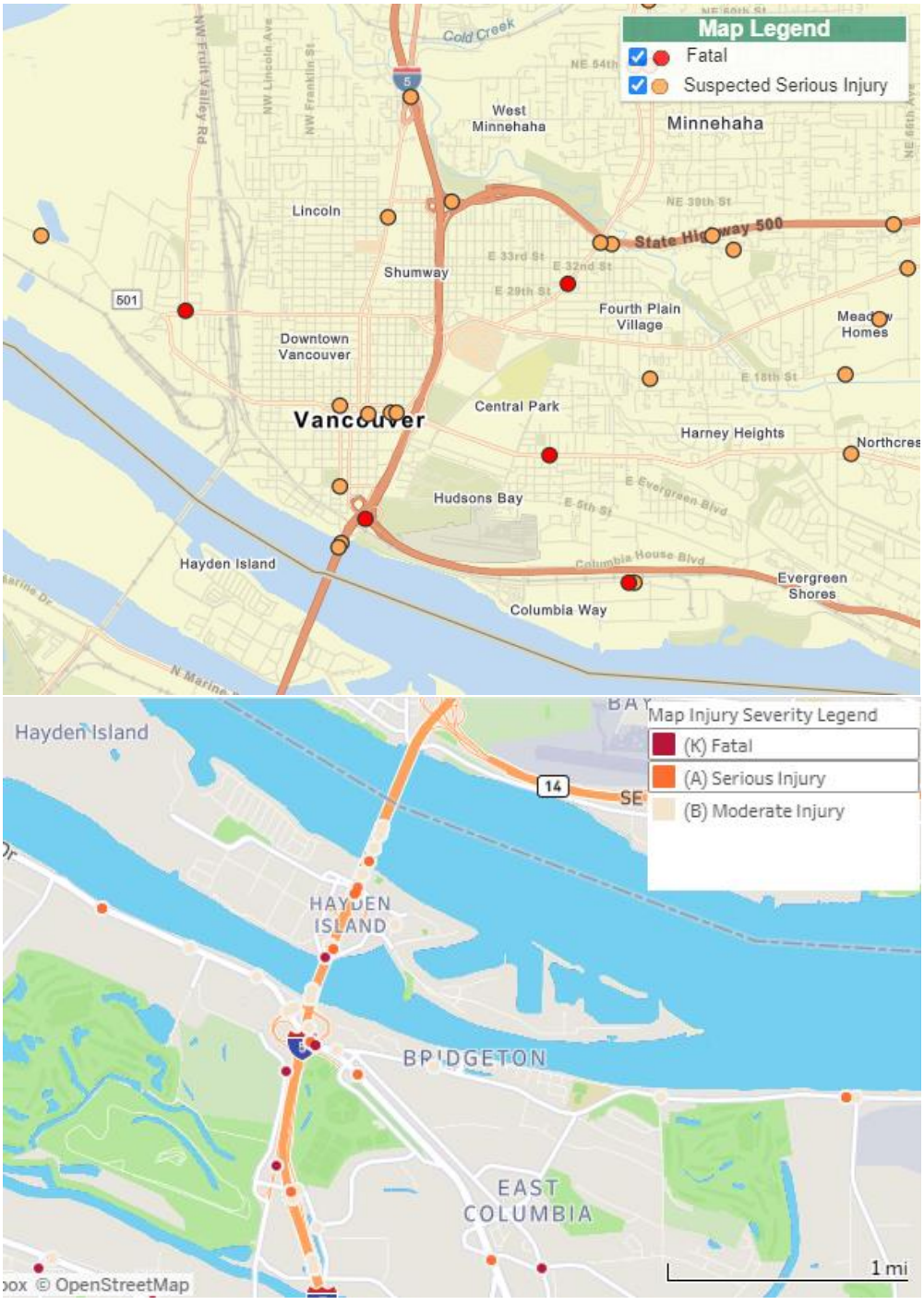
Figure 9. Rates per 100,000 for traffic crash serious injuries and fatalities. 2015-2022. Source: ODOT Crash Data Viewer, WSDOT Crash Data Portal, ACS 5-year population counts.[75,87,87]



The *DSEIS Transportation Technical Report* includes crash data from 2015 through 2019. Between 2015 and 2019 there were 2,270 crashes that occurred within the study area between 2015 and 2019. A little over half of these occurred on the I-5 mainline (Table 3-34, *DSEIS Transportation Technical Report*).[77(p3-117)] Overall, 38% (n=856) resulted in an injury, 1.5% (33) resulted in a serious injury, and 0.3% (7) resulted in a fatal injury. Seventeen involved a bicycle and 30 involved someone walking (Table 3-37, *DSEIS Transportation Technical Report*). [77(p3-120)]

In 2022, there were five fatal crashes within the IBR study area, four in Multnomah County and one in Clark County (Figure 10).[87,88] This is two short of the seven total identified over a five year span in the DSEIS Transportation Technical Report.

Figure 10. Fatal and serious injury crashes in IBR study area, 2022 Source: ODOT Crash Data Viewer, WSDOT Crash Data Portal.[87,88]



Black residents experience a disproportionate amount of transportation safety concerns in the region. Not only do Black community members experience higher death rates from traffic crashes and visits to the emergency room for traffic-related injuries, they also experience biased behavior, harassment, violence, and unfair policing. This stems from racism and racist systems baked into regional housing, transportation, and law enforcement practices.[89] Involving community in redesign for their neighborhoods can proactively encourage more, better, and safer options for everyone.

Potential Project Impacts

The *DSEIS Transportation Technical Report* relies on the Enhanced Interchange Safety Analysis Tool (ISATe) estimated to predict changes in crash frequency that may occur with and without implementation of the MPLA. ISATe predicts that across the freeway network there will be up to a 28% increase in total crashes with the No-Build Alternative, and up to a 15% increase in crashes with the Modified LPA.[77(p4-159)] The ISATe model assumes fewer crashes will occur with more lanes, and therefore predicts that the MPLA option with two auxiliary lanes would reduce crash frequency by an additional 4% compared to the MPLA with one auxiliary lane, for a total net increase in crash frequency of up to 11%.[77(p4-161)]

The DSEIS Transportation Technical Report does not provide further detail on changes in crash type, severity, location, or time due to uncertainty in ISATe, but notes removal of the bridge movable span could further reduce crashes in the MLPA. ISATe predicts that changes in crash frequencies will be negligible, with the exception of a small increase at the intersection of Evergreen Boulevard and C Street.[77(p4-160)] The *DSEIS Transportation Technical Report* provides a descriptive account that safety outcomes for active transportation modes would improve because of facility improvements, but no additional evidence or analysis is provided. There is inadequate information to conclude to what degree severe injury and fatalities will be reduced with implementation of the MPLA.

Environmental Justice and Health Equity

Urban development that supports safe physical activity is not evenly distributed across the region. Some corridors in the region have higher crash rates than others, known as high injury corridors. Sixty-five percent of high injury corridors on regional roadways are through areas with higher proportions of communities of color, people with low-income, or people with limited English.[90] Who lives in areas that support active transportation today is shaped by past patterns of housing discrimination and disinvestment, disproportionately excluding communities of color and low-income communities.[91] The DSEIS does not assess how changes in travel safety across each mode type might vary by priority environmental justice community.

Transportation Access Literature Review

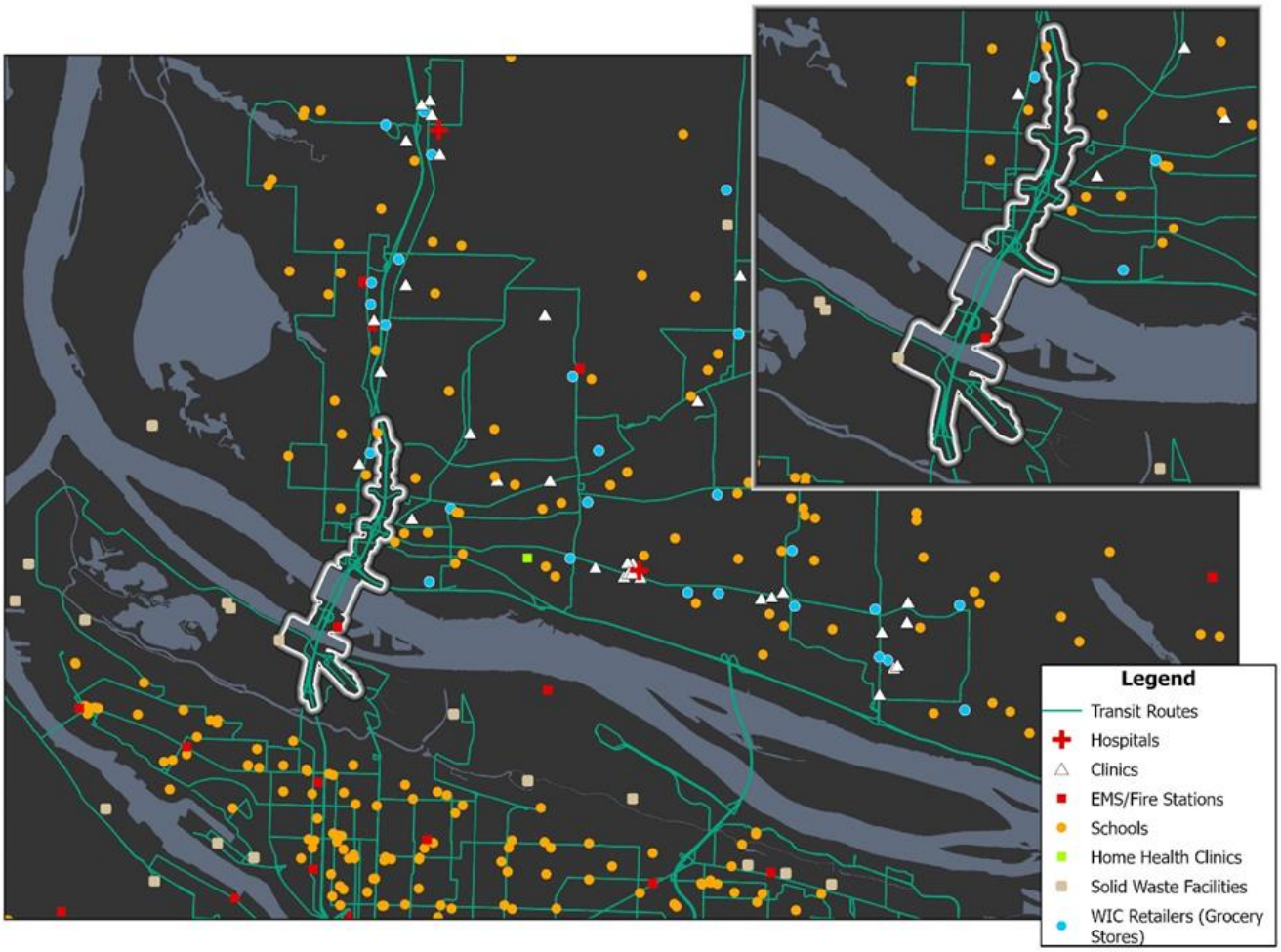
Literature Review

Transportation barriers are a major factor in accessing and maintaining healthcare across the United States. Lack of transportation can lead to delays in accessing health care, which can lead to delayed diagnosis, treatment, and reduced health outcomes. It can also disrupt care through missed appointments, disrupt access to pharmacies for medication, and create longer transit times to access care which requires additional time off work and added childcare burden.[36,92] Of particular concern is how unmet transportation needs impact children's access to health care including mental health care, "obtaining medication, accessing dental care, immunizations, chronic illness care, specialized care, and follow-up emergency care".[93] Children of color, children with vulnerable citizenship status, and children whose caregivers need financial support experience the health care impacts of transportation burden at higher rates.[93]

Potential Project Impacts

The IBR Program will naturally include some amount of disruption to daily life for community members living and working in and around the project area. The map below (Figure 11) includes some (though not all) examples of essential services, access to which should be considered and maintained as much as possible during program planning and execution. Mapping was restricted to data made publicly available by individual states, counties, and local municipalities, which causes some variation in data availability, especially across state lines. Date of most recent update also varies across data sources. Therefore, this map should not be considered a complete or up-to-date picture of the community. Locations like schools, grocery stores, clinics and hospitals, pharmacies, emergency services, transit stops, and public utility facilities are essential to the daily functioning of the community. Disruption of access to these services can have significant impacts on individual and community well-being. Those individuals that will have to find a new route through or around IBR-related construction to reach their essential services are particularly vulnerable.

Figure 11: Essential services and facilities in and near the IBR Program area.



Sources: Oregon Metro RLIS[94] (transit routes including buses and rail lines, hospitals, fire stations, schools, solid waste facilities), City of Vancouver[95] (transit routes including buses and rail lines), Washington Department of Health[96] (clinics, EMS stations, home health clinics, WIC retailers), and Washington State Office of Superintendent of Public Instruction (schools)[97]

Project Construction

Over the course of the construction period travel routes will change due to road closures, lane closures, traffic detours, relocation in bus stops, transit station closures, transit schedule changes, and sidewalk and bicycle lane impacts.[77(p5-3)] Additionally, changes in travel patterns due to construction could lead to increased congestion and diversion on alternative rates, increasing the risk of additional delay, as well as crash frequency (Table 5-1, *DSEIS Transportation Technical Report*).[77(p5-5)] The *DSEIS Environmental Justice Technical Report* also notes that if the sidewalks over the I-5 bridge are closed, access across the river could be cut off entirely for people whose only mode of travel is on foot or by bike, because the I-205 bridge is not a practical distance for an alternative.

These construction-related transportation barriers will affect access to homes, jobs, schools, health care facilities, and other essential destinations. This has the potential to create acute stress, make chronic stress worse, and interrupt access to programming and services that keep people healthy.

Long Term Effects

The improvements in light rail and transit service will generally increase access to jobs and other services in the region. Although, as mentioned above, improvements are not the same among sub groups, and access to jobs for BIPOC residents, communities with limited English proficiency, immigrants and refugees, and people under the age of 25 will not increase as much as it will for white, non-Hispanic residents (Table 4-2, *DSEIS Equity Technical Report*).[82(p4-3)]

Evaluation of potential tolling scenarios in the *DSEIS Environmental Justice Technical Report* found that some environmental justice populations might experience adverse effects. Despite improvements in trip time, reliability, and alternative transportation options, some low-income households may still experience disproportionate financial burden in scenarios where they have no other choice to drive over the bridge and pay the toll.[98(p4-40)]

Environmental Justice and Health Equity

Transportation access to healthcare often disproportionately affects older adults, people with disabilities, veterans, people with chronic health conditions, and people of color. Disproportionate negative impacts are also experienced by pregnant people, people with young children, and people experiencing homelessness.[92] Even when studies controlled for socioeconomic status, they still found higher transportation barriers and decreased healthcare access among communities of color.[99] As mentioned above, tolling may create a disproportionate financial burden on low-income households unable to benefit from improvements in transit and active transportation options, such as someone needing medical care. This could create an additional barrier to health care, as well as other essential services.

Noise

Literature Review

Health concerns associated with noise exposure include cardiovascular disease, diabetes, reduced cognitive functioning, annoyance, stress, sleep disturbance, adverse birth outcomes, and noise-induced hearing loss.[36,100,101] Noise exposure also affects quality of life, mental health, and sleep quality, which are essential for health. Health impacts can result from short, intense sounds as well as loud background noise.

Children, older adults, shift workers, and construction workers are at greater risk for noise-induced health effects.[102] Noise exposure and noise disruptions can cause increased attention issues, decreased reading comprehension, communication difficulties between children and their teachers, and increased stress and blood pressure in both adults and children.[103,104] Students learning in their second, third, or more language may be at an even greater disadvantage than other students when faced with a noisy learning space.[105]

Older adults, shift workers, and people with preexisting sleep disorders are more sensitive to noise-induced sleep disturbance, which can occur when noise levels are as low as 33 dBA.[106] Sleep disruptions strain the cardiovascular system, disrupt circadian rhythms, and raise blood pressure.[107] These sleep disruptions can lead to long-term health problems like cardiovascular disease. Undisturbed sleep is essential for daytime functioning, health and wellbeing.[106]

For workers, the National Institute for Occupational Safety and Health (NIOSH) recommended exposure limit for occupational noise is 85 dBA over an 8-hour period and the Occupational Safety and Health Administration (OSHA) requires a hearing conservation program at this level to protect from hearing damage.[108,109] While not regulatory, the U.S. EPA and WHO recommend noise exposure limits to protect against adverse health effects and hearing loss. For 24-hour averaged exposure, the U.S. EPA recommends a 45 dBA (indoor) and 55 dBA (outdoor) exposure limit to protect against adverse health effects, and a 70 dBA exposure limit to protect against hearing loss.[107,110] The WHO recommends limiting road traffic noise to 53 dBA during the day, and 45 dBA at night to prevent adverse health effects.[101] These are all more protective than the A WSDOT (65 dBA), ODOT (66 dBA), and FHWA (67 dBA) noise limits, which are regulatory (see Table 9 below).

Noise pollution, like other types of air and environmental pollution, is not equitably distributed. In the United States, people of color and immigrants are overrepresented in construction jobs with a higher risk of injury.[102] People with lower income and people of color are more likely to be exposed to both more noise and environmental pollution.[101,102] Systemic racism and other inequitable urban development and land use practices historically and presently contribute to poor health outcomes for people of color and people with low income. Exposure to noise pollution further increases risk of adverse health outcomes.

A WHO systematic review on noise interventions and health outcomes found that evidence, though limited, shows that transport noise interventions benefit health.[111] It is generally difficult to consistently study the link between environmental noise interventions and health outcomes. There are several studies on noise levels affected by noise mitigation, but fewer that explicitly study the link between noise mitigation and health outcomes.

Explanation of noise measurements

Sound intensity or pressure is measured in units of decibels (dB). The decibel scale is logarithmic, which means small increases in dB result in increasingly louder sounds to the human ear. For every 3db increase, the sound intensity doubles, and for every 10 dB increase, the sound is 10 times louder. For example, a 10-dB noise is 10 times louder than 0 dB, and a 20-dB noise is 100 times louder than 0 dB. The A-weighting noise scale (dbA) is more sensitive to the range of human hearing.

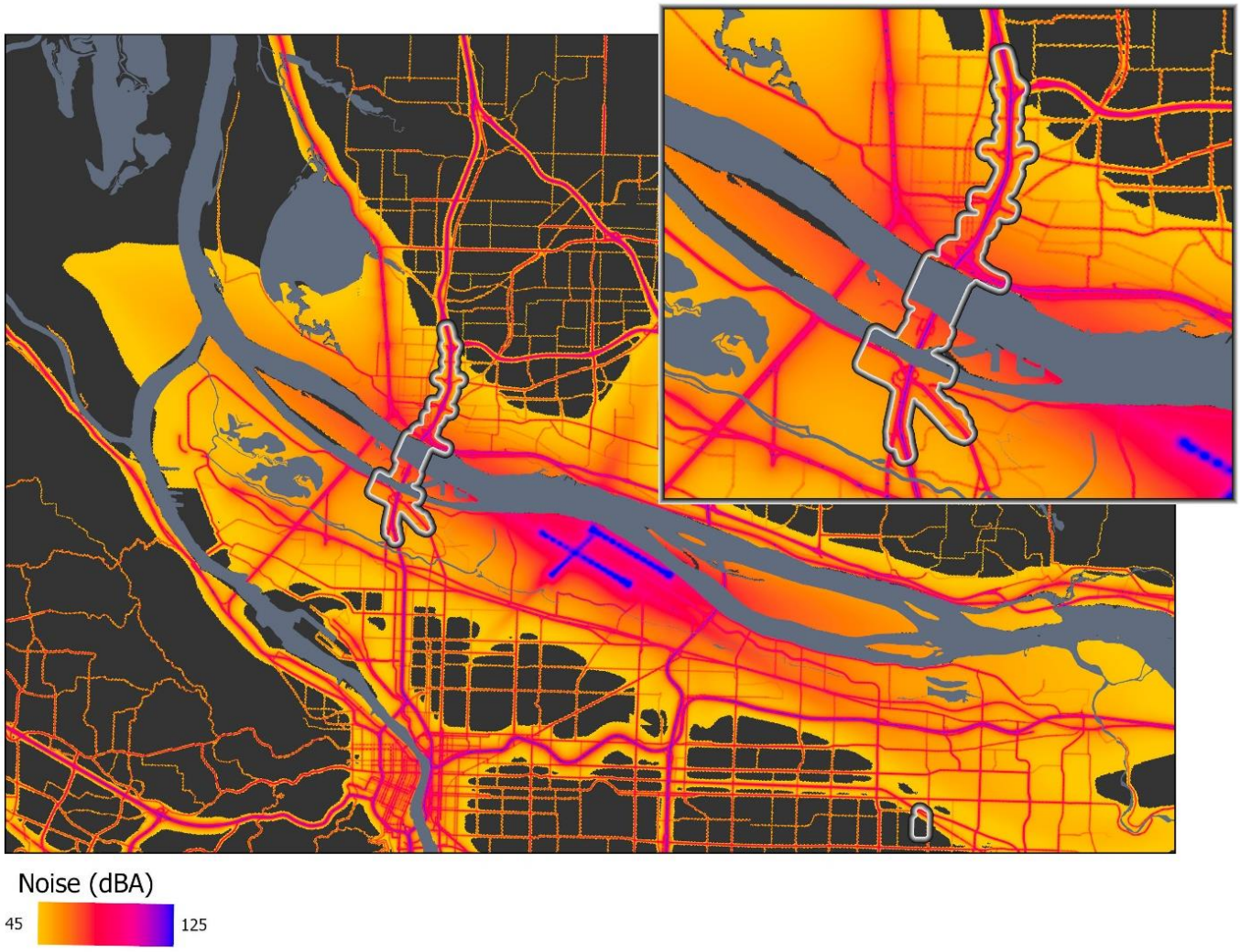
Noise levels are reported using different units and acronyms that describe the how, what, and when of the noise measurement. A-weighting is the standard for environmental noise assessment. In the noise modeling process, some noise levels are weighted differently to account for the fact that people are more sensitive to noise during typical nighttime sleeping hours than during the day, which is why some recommendations include different levels for day and nighttime.

Local Context

In the IBR Program focus area, 30% of individuals have high blood pressure, 14% report poor mental health, and nearly 10% have diabetes.[23]

The project area neighbors Portland International Airport, Pearson Field, Portland International Raceway, and active railways. Road, air, and rail traffic contribute to existing noise pollution, with average 24-hour noise levels ranging from 45 dBA in locations farther from transportation infrastructure and increasing up to 89 dBA near/on roads, railways, and airport locations (Figure 12).

Figure 12. 24-hour average noise levels (decibels A) in and near the project area from road, aviation, and rail traffic in 2020. Source: USDOT Bureau of Transportation Statistics[112]



The DSEIS includes noise measurements to establish existing conditions. Noise measurements were taken from various locations: schools, park trails, residences and hotels, libraries, museums, and athletic fields. The FHWA, ODOT and WSDOT have noise abatement criteria for different categories of indoor and outdoor space (see Table 9).[113]

Table 9. ODOT, WSDOT and FHWA Noise Abatement Criteria for Hourly Average Noise Levels[113]

	ODOT	WSDOT	FHWA
	Noise Abatement Criteria Hourly A-Weighted Sound Level Decibels (dBA)		
Residential (single and multi-family units) (Exterior)	65 dBA	66 dBA	67 dBA
Schools, libraries, hospitals and medical facilities, day care centers, auditoriums, places of worship, active sport areas, trails (Exterior)	65 dBA	66 dBA	67 dBA
Schools, libraries, hospitals and medical facilities, day care centers, auditoriums, places of worship (Interior)	50 dBA	51 dBA	52 dBA
Commercial areas, hotels, offices, restaurants/bars (Exterior)	70 dBA	71 dBA	72 dBA

The Washington State Board of Health's Chapter 246-366 WAC requires noise to be below well WSDOT thresholds, at 55 dBA hourly average, for new school siting and existing instructional school spaces, with exceptions where approved sound reduction is used in construction.[114] In existing indoor spaces, background noise must be below 45 dBA over a 30-second average (with the ventilation system running). Multiple schools are near the project area in Vancouver, including elementary, middle, and high schools, a community college, and the Washington State School for the Blind. Discovery Middle School was the only school location where noise measurements were taken for the DSEIS (Table 2-11, *DSEIS Noise and Vibration Technical Report*).[113(p2-25)] Measurements were also taken at an athletic field at Clark College.

Current traffic noise levels approach or exceed ODOT noise abatement approach criteria in 50 locations in Portland—primarily residences—including 18 floating homes, multi-level apartment units, and one restaurant. There are 110 locations in the Vancouver project where traffic noise levels currently exceed WSDOT noise abatement criteria, including residential locations, offices, and outdoor recreational spaces.

Current noise levels ranged from 57 dBA (Leverich Community Park Disc Golf/Picnic in Vancouver) to 77 dBA (Discovery Middle School and the intersection of Columbia St. and W. 4th St. in Vancouver). Noise levels in residential areas in north Vancouver ranged from 56 to 77 dBA, with loudest areas near noise wall openings or in areas without noise walls. Noise levels for residential floating homes in North Portland ranged from 66 to 69 dBA.

Potential Project Impacts

Project Design

The DSEIS determined that noise walls are the only feasible form of noise mitigation for the project. The DSEIS evaluated 18 potential noise walls, including the removal of existing noise walls and construction of upgraded noise walls, and determined 10 to be feasible and reasonable for consideration in project design. With mitigation, the Modified LPA would have 93 fewer traffic noise impacts than under the No-Build Alternative.

Project Construction

The DSEIS considers construction noise levels over a 9-year period. Maximum noise levels could reach up to 82-94 dBA at the closest receiver locations. In the *DSEIS Noise and Vibration Technical Report*, Table 5-1 details typical construction equipment used for the Modified LPA and demolition, their project use, and maximum noise level. Table 5-2 includes average maximum noise levels for construction activities, including demolition of existing buildings (93 dBA), staging for construction (94 dBA), and other activities like installing signage (91 dBA) (Table 5-2, *DSEIS Noise and Vibration Technical Report*).[113(p5-5)]

Long-Term Impacts

In Portland, the Modified LPA would approach or exceed ODOT noise abatement criteria at 60 residences and one sports field.[113(p4-13)] This varies slightly from the total count of residential exceedances listed in the *DSEIS Noise and Vibration Technical Report* Table 4-1, which is 63 residences. The *Technical Report* modeled noise levels for the Modified LPA, No-Build Alternative, and Existing Conditions. In Vancouver, the Modified LPA would approach or exceed WSDOT noise abatement criteria in 138 locations, including residences, offices, and outdoor space at the Vancouver Community Library and Discovery Middle school. Table 10 includes the number of locations that exceed noise abatement criteria under existing conditions, the Modified LPA, and a No-Build Alternative.

Table 10. Noise exceedances under the Modified LPA, No-Build Alternative, and Existing Conditions

	Modified LPA noise exceedance locations	No-Build noise exceedance locations	Existing Conditions noise exceedance locations
Portland*	65	64	50
Vancouver#	138	151	110
Project Area Total	203	215	160

*Sources for Portland exceedances: Table 4-1 DSEIS Noise and Vibration Technical Report (Modified LPA); Table 4-1 DSEIS Noise and Vibration Technical Report (No-Build); Table 3-1 DSEIS Noise and Vibration Technical Report (Existing Conditions)

#Sources for Vancouver exceedances: Tables 4-4, 4-6, 4-8, 4-10 DSEIS Noise and Vibration Technical Report (Modified LPA); Tables 4-3, 4-5, 4-7, 4-9 DSEIS Noise and Vibration Technical Report (No-Build); Tables 3-2, 3-3, 3-4, 3-5 DSEIS Noise and Vibration Technical Report (Existing Conditions)

In Portland, under the Modified LPA "most locations would experience an increase of 2 to 4 dBA over existing conditions, with increases of up to 11 dBA at one location".[113(p4-12)] Again, since decibels are on a logarithmic scale, a roughly 3-dB increase doubles the intensity of the sound, and a 10-dB increase means the sound is 10 times louder. Compared to the No-Build Alternative, noise levels under the Modified LPA would range from 2 dBA above to 2 dBA below current levels (p. 4-12) Jantzen Beach RV Park would experience the greatest increase in noise levels (4 to 11 dBA increase above Existing Conditions, and 4 to10 dBA above No-Build Alternative).

In Downtown Vancouver, under the Modified LPA, "noise levels would approach or exceed the WSDOT noise abatement criteria at the same 37 multi-family residences as existing conditions along with four additional residences[…]"[113(p4-32)] Modified LPA noise levels would be within 3 dBA of the No-Build Alternative at most locations; some areas will experience up to an 8 dBA reduction or increase under the Modified LPA.

In Fort Vancouver, traffic noise level exceedances for trails would be the same under the Modified LPA and No-Build Alternative. Two residences and two offices would experience increases. "Compared to the No-Build Alternative, traffic noise levels Under the Modified LPA are expected to increase throughout much of the Fort Vancouver area by up to 10 dBA..." and decrease by 4 dBA in other areas.[113(p4-44)]

In Vancouver East of I-5 and North of Mill Plain, the Modified LPA would exceed WSDOT noise abatement criteria at 26 locations, compared to 31 under the No-Build Alternative. West of I-5 and North of Mill Plain, the Modified LPA would exceed WSDOT noise abatement criteria in 54 locations, which is the same number of locations as Existing Conditions and No-Build Alternative, while the specific sites vary slightly. Notably, an up-to-10 dBA increase under the Modified LPA compared to No-Build Alternative is possible for residences near proposed ramp improvements (between E 33rd and E 35th Streets).

Environmental Justice and Health Equity

The Washington State Board of Health's Chapter 246-366 WAC requires noise to be below specified thresholds for new school siting and existing instructional school spaces. In existing spaces, background noise must be below 45 dBA and 70 dB (over a 30 second average).[114] Table 2-11 of the *DSEIS Noise and Vibration Technical Report* states that a 77 dBA noise level was measured at Discovery Middle School.[113(p2-25)] The DSEIS determined that noise walls are the only feasible form of noise mitigation for the project; however, the DSEIS states that the noise wall proposed to reduce noise for Discovery Middle School and seven nearby residences (Noise Wall 1) did not meet WSDOT criteria for reasonableness because its cost estimate exceeded WSDOT reasonable allowance criteria.[109(p7-12)] A shortened wall is recommended for consideration, though it would not reduce noise impacts for Discovery Middle School. As discussed above, children are particularly sensitive to attention, learning, and health impacts of noise exposure. Our recommendations reflect necessary attention toward mitigating noise exposure to lower levels than currently impacting Discovery Middle School and potentially impacting the school under the Modified LPA.

Additionally, the project area is adjacent to Portland International Airport and active railways. Neighborhoods in the project area—particularly Hayden Island, Bridgeton, and East Columbia in Portland, and Columbia Way, Hudson's Bay, Esther Short and Arnada in Vancouver—already experience combined noise pollution of road and aviation traffic. Project construction will add to combined noise levels. Further, potential traffic diversion to the I-205 bridge during construction and/or tolling may increase combined noise and air pollution to neighborhoods east of the project area.

The *DSEIS Environmental Justice Technical Report* describes higher levels of noise and vibration will that negatively and disproportionately impact communities identified as equity priority communities. Seven residences in the Rose Village neighborhood—identified by IBR as a "meaningfully greater EJ area for both low-income and minority populations"—would experience increased noise levels by 2-12 dBA under the Modified LPA.[98(p4-10)] The project currently proposes a noise wall to mitigate noise impacts to affected households in Rose Village. The *DSEIS Environmental Justice Technical Report* also identified the potential for disproportionately high levels of noise and adverse effects in the East Columbia and Esther Short neighborhoods, which are high-priority environmental justice areas identified by the Program.

Climate Change and Health

Literature Review

Changes in climate and the environment can have profound impacts on human health. The Northwest region is already experiencing climate change impacts, and the impacts of climate change on health are projected to increase with warming global temperatures.[115,116]Climate-related hazards such as heat and increasing heat waves, wildfire smoke and air pollution, severe weather and flooding are associated with numerous adverse health outcomes.[116–118] Hotter and longer heat waves are associated with heat-related illnesses, adverse maternal and infant health outcomes, mental health impacts, cardiovascular failure, and death.[119] In addition to extreme heat, climate change also increases the probability of other severe weather events, including flooding, which may cause injury, water contamination, and even death.[120,121]

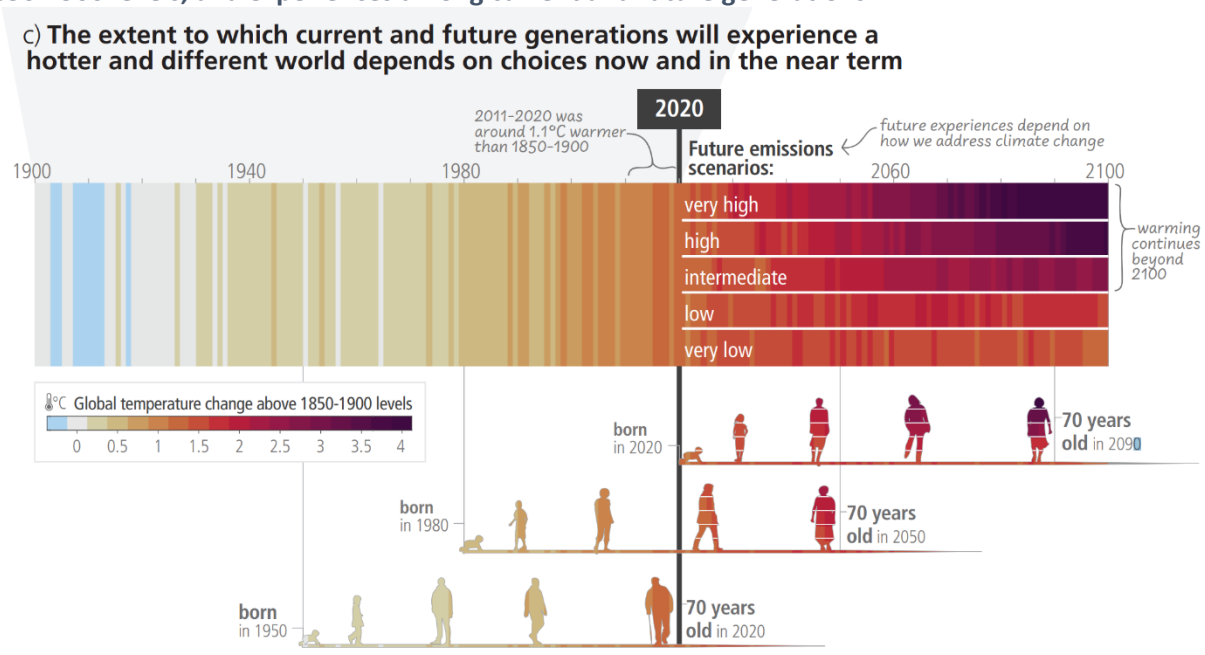
Climate-related hazards can compound to worsen existing exposures.[122] For example, excess heat may also exacerbate existing hazards related to air quality mentioned previously (Charlson et al., 2021; NIH, 2022). Additionally, across hazards, climate change threatens mental health and wellbeing.[42]

Potential Project Impacts

The IBR Program has the potential to affect climate impacts through greenhouse gas (GHG) emissions during project construction and operation of the bridge. The *DSEIS Climate Change Technical Report* outlines opportunities and a framework to limit and reduce GHG emissions to align with local, state, and federal climate and sustainability goals.[123(p1-9-1-13)] The *report* states the Modified LPA is "anticipated to reduce GHG emissions compared to the No-Build Alternative" based on the extension of light rail service, strategies to reduce congestion and idling, opportunity to reduce travel demand, and options to increase mode shift and infrastructure for active transportation.[123(p1-7)] Both the No-Build Alternative and Modified LPA are estimated to result in fewer GHG emissions in 2045 compared to the 2015 baseline based on existing regulatory requirements (*see MOVES model, Air Quality section*) and an expected shift in electric vehicle uptake.[124(p3.19-16)] Assuming adoption of electric vehicles in accordance with Oregon and Washington state rules, the MLPA is estimated to reduce total GHG emissions around 1% (MT CO2e/day) in the traffic subarea in 2045, compared to the No Build Alternative.[124(p3.19-18)] This daily reduction is equivalent to around eleven gasoline-powered passenger vehicles driven for one year.[125] Construction of the new bridge will produce GHG emissions, and construction may impact emissions due to traffic delays.[124(p3.19-19-20)] The *DSEIS Climate Change Chapter* notes "emissions generated from the construction of any of the Modified LPA design options would be similar."[124(p3.19-6)] As mentioned in the Air Quality section, the IBR Program has the potential to mitigate climate impacts through design that encourages and increases opportunity for transportation mode shift. Reducing GHG emissions now and in the short-term can mitigate future climate change impacts and global temperature change that directly and indirectly affect health outcomes (Figure 13).[126]

Hazard-specific potential project impacts are included in sub-sections below.

Figure 13. Overview of future emissions scenarios and projected global temperature change above 1850-1900 levels, and experiences among current and future generations



Source: Intergovernmental Panel on Climate Change, 2023[126]

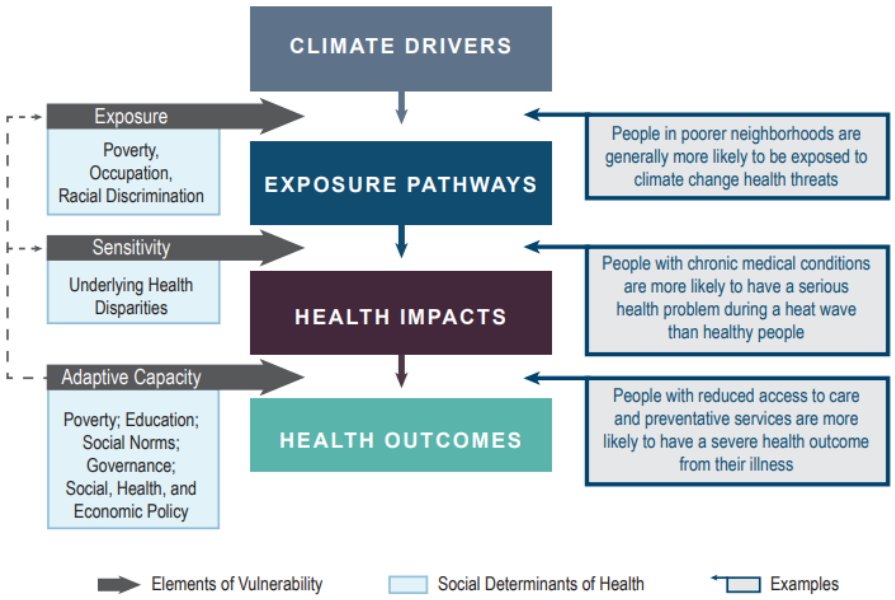
Environmental Justice and Health Equity

Certain groups of people are more vulnerable than others to health stressors from climate-related events like extreme heat, floods, poor air quality, and other similar events. These groups include children, pregnant people, older adults, people with disabilities, and people with chronic medical conditions.[127]

Unjust policies and practices, including historic underinvestment, systemic racism, marginalization, discrimination, and environmental injustice, have resulted in some communities experiencing climate impacts worse than others.[127,128] Some BIPOC communities or low-wealth communities may live in areas that have been historically redlined or faced structural exclusion, areas with outdated or aging infrastructure, and/or areas disproportionately burdened by pollution or climate exposures (environmental justice communities).[129–131] Low income and BIPOC communities often bear an unfair burden of exposure to pollution and climate impacts, yet have contributed the least to greenhouse gas emissions.[116] Historically, major transportation projects have often contributed to environmental injustices and health inequities in low income and BIPOC neighborhoods.[132(pp346-347)] Some social factors, like income, can impact access to resources to adapt to climate change (e.g., ability to afford or access air conditioning, indoor air filters, or flood/disaster insurance).[129,133] BIPOC communities may already experience stressors that influence health, and climate change adds another stressor and threat to health.[134]

People and communities may experience overlapping vulnerabilities that impact health risks from climate change (Figure 14). For example, outdoor workers with asthma or another respiratory condition may be more sensitive and exposed to wildfire smoke than other groups.[131] Children who live in a neighborhood with less trees or greenspace may be more vulnerable to heat compared to adults and those living in more shaded areas.

Figure 14. Overview and examples of how the Social Determinants of Health can impact vulnerability to climate change



Source: Gamble et al., 2016 [116]

In the IBR project area, the average prevalence of high blood pressure and diabetes are slightly higher compared to Clark and Multnomah counties overall (Table 5).[23] A higher percentage of people living below 200% poverty (33%) live in the project area compared to Clark and Multnomah counties overall (Table 4). According to the literature, people with low income may be more burdened by climate change health impacts.[127,135] Additionally, groups particularly susceptible to climate-related hazards represent a notable proportion of the population living in the project area. These include older adults (18%), people with disabilities (20%), people who are unemployed (5.3%), and people without health insurance (7.4%) (Tables 3, 4).[23] Climate change can negatively impact the health of socially vulnerable groups, and Figure 5 displays several socially vulnerable census tracts in the IBR project area compared to the rest of the region.[135] Similarly, the DSEIS states the program focus area includes six schools, six assisted living facilities, and five healthcare facilities. Similar to air pollution impacts, these institutions may include people who are particularly susceptible to climate-related health impacts.

Heat

Literature Review

Extreme heat poses a significant threat to public health and safety, and is the leading cause of weather-related injury and death in the United States.[136] Exposure to heat can result in heat-related illness (including heat cramps, heat exhaustion, and heat stroke), mental health impacts, adverse perinatal outcomes, cardiovascular failure, and death.[119,137–139] High temperatures, heat early in the season, long periods of excess heat (heat waves), and high nighttime temperatures (lack of overnight cooling) are particularly hazardous for public health.[140–142]

The National Integrated Heat Health Information System defines “urban heat islands” as the phenomenon that cities get much hotter compared to rural or vegetated landscapes, due to buildings, unshaded roads, and other paved areas gaining heat during the day and emitting heat into the surrounding air.[143] Therefore, people who live in cities are more likely at risk of heat compared to rural and suburban communities.[144] Within cities, heat exposure and related health impacts may vary by neighborhood. This is due to an inequitable distribution of trees and greenspaces, where some areas may have more heat-absorbing buildings and pavements than other surrounding neighborhoods.[144] Historic redlining and systemic underinvestment may be contributing factors to the inequities in exposure to heat in certain neighborhoods, where a higher percentage of BIPOC communities and low-wealth communities may live.[116,144] Additional equity considerations around heat islands include access to cooling centers, inadequate housing conditions, and a higher cost burden of air conditioning bills.[116,144]

Local Context

Figure 15 displays tree canopy cover around the project area in Clark and Multnomah counties. The IBR Project area has less tree canopy cover (16%) compared to Clark (24%) and Multnomah (25%) counties overall.[145] Tree canopy cover can provide shade and cooling to surfaces, so it is one measure that can be used as a potential estimation of heat exposure.

Figure 15. Tree Canopy Cover in Region and IBR Study Area

From 2016-2022, there were 112 heat-related deaths in the Portland metropolitan area (including Washington, Clackamas, Multnomah, and Clark counties).[146,147] In 2021, the year of the Pacific Northwest heat dome event, the region experienced the highest number of recorded heat-related deaths.

Potential Project Impacts

Analyses included in the DSEIS *Climate Change Technical Report* projects average temperatures and number of extremely hot days will increase during the construction of the bridge and project lifetime.[123(p4-5-4-6)] The report notes infrastructure design considerations "should withstand regular air temperatures well over 100° F" to avoid disruptions to transportation.[123(p4-6)]

The IBR Program may influence exposure to urban heat. There are several opportunities to reduce and mitigate exposure to heat for bridge workers and community members alike—and prevent heat-related illness and death throughout the program's design, construction, and operation. The DSEIS *Climate Change Technical Report* includes information about specific measures to provide shade and cooling for bridge users, especially for pedestrians and bicyclists.[123(p4-6)] To mitigate the urban heat island effect, the program and local agencies could increase greenspace and tree canopy cover and reduce the amount of paved surfaces in areas surrounding bridge.[123(p3-4)] The *Report* specifies monitoring stations along active transportation facilities that track heat to alert bridge users of its safety.[123(p7-4)] The *Report* cites occupational safety rules from Oregon Occupational Safety and Health Administration and Washington Labor & Industries to protect workers from the negative health outcomes of heat exposure.[123(p4-6)]

Environmental Justice and Health Equity

While heat can affect everyone, some communities are more sensitive to heat, may be more exposed, or may have less access to resources to cope with heat. A 2018 study in Portland found that Black, Native Hawaiian or Pacific Islander, Hispanic, and youth populations were most exposed to urban heat.[148] Older adults, infants and children, pregnant people, and people with existing health conditions or who take certain medications may be more sensitive to heat and more at risk for heat-related illness.[149–151] Some communities may be more exposed to heat due to social or structural factors, like where you live or work, including low-wealth communities, people living unsheltered or unhoused, people living in urban heat islands, people without access to air conditioning, people who exercise outdoors, and outdoor workers.[120,152]. According to a 2018 report on climate risks in Washington State, among construction workers "heat related illness is most common among roofing construction and highway/bridge construction workers."[129(pp40-41)]

Wildfire Smoke and Ozone Pollution

Literature Review

Wildfire smoke especially threatens public health in the Pacific Northwest. Wildfire smoke contains several air pollutants, including fine particulate matter ($PM_{2.5}$) that can penetrate deep into the lungs and bloodstream.[153] Exposure to wildfire smoke can cause and exacerbate respiratory, cardiovascular, and neurological diseases, mental health impacts, as well as other impacts to the skin, gut, kidneys, eyes, nose, and liver.[154–156] Wildfire smoke exposure in pregnancy is associated with increased risk of adverse birth outcomes, including preterm birth and lower birth weight in some studies.[153,157] Wildfire smoke exposure has also been linked to premature death.[158]

Ozone is an air pollutant with documented health effects, and higher temperatures increase the production of ozone at ground-level. Ground-level ozone in the air can cause health effects such as sore throat, coughing and breathing problems, susceptibility to infections, and exacerbate existing conditions like asthma, emphysema, and chronic bronchitis.[159]

Local Context

In recent decades, the western United States has experienced an increase in the frequency and severity of wildfires, and associated wildfire smoke.[160] In the last decade, there have been several severe wildfire smoke events impacting the region. The Washington State Department of Ecology identified Vancouver as one of sixteen overburdened communities in Washington highly impacted by air pollution, specifically high levels of $PM_{2.5}$.[50] The Portland-Vancouver metropolitan area also experiences high ozone levels, especially on hotter days.

Ten percent of adults in the IBR project area have asthma (Table 5).[23] Asthma prevalence is similar in Clark and Multnomah counties overall.[23] While there may be several factors contributing to asthma and other chronic respiratory conditions, asthma is an important health outcome as people with asthma may be more impacted by poor air quality.

Potential Project Impacts

The DSEIS *Climate Change Technical Repor*t notes the region will "see an increase in severe smoke events" in the future.[123(p4-9)] Severe smoke events could impact bridge construction and use, including impacts to visibility and exposure to air pollution among bridge workers, pedestrians, bicyclists, transit users, and community members.

There are several opportunities for the IBR Program to mitigate exposure and protect public health during smoky conditions and poor air quality, including provision of training and protective equipment for workers, reducing construction or transportation pollution during severe smoke or ozone events, and planning for smoke-related disruptions for active transportation users, such as intermittent closures or detours. The DSEIS *Climate Change Technical Report* cites state rules to protect workers during smoky conditions.[123(p4-9)] The Program should consider cumulative effects of air pollution when planning for high wildfire smoke or ozone days.

Environmental Justice and Health Equity

People with existing health conditions (such as asthma, Chronic Obstructive Pulmonary Disease (COPD), diabetes, chronic kidney disease, or heart disease), older adults, pregnant people, infants, and children are especially at risk of air quality-related health outcomes.[155,158,161] Outdoor workers, including those working in construction, transportation, or agriculture, are particularly at risk of wildfire smoke exposure and long periods of air pollution.[153,162] Nationally, low-income populations and BIPOC communities are overburdened by air pollution.[153] Racism in housing, including historic redlining, housing segregation, and neighborhood disinvestment, has contributed to inequities in exposure to air pollution.[153] Further disparities around air pollution exposure may persist due to inequitable access to air conditioning and air filtration in homes and schools in low-income neighborhoods and BIPOC communities.[153]

Severe Weather and Flooding

Literature Review

Severe weather, including snow, ice, or windstorms, flooding, and thunderstorms can impact health directly, as well as disrupt infrastructure vital to health and wellbeing (such as electricity, transportation, healthcare, safe water, and sanitation). Winter storms can cause injury and increased risks of falls, hypothermia, frostbite, mental health impacts, and death.[163] Flooding can cause immediate risks to human health, such as injury and death. Flooded waters can be contaminated and lead to human illness.[163–166] Flooding may also pose risks to human health through disruption of critical services (e.g., roads, transportation, drinking water) and disrupt wastewater infrastructure.

Local Context

Human-induced climate change has altered weather patterns and increased the frequency and intensity of extreme weather events. Future trends in weather events, particularly precipitation predictions, are uncertain. However, there is some evidence that extreme precipitation and flooding event will increase due to climate change.[167,168] A general upward trend in precipitation should be expected in the Lower Columbia River Basin, with additional risk for winter atmospheric river flooding.[169]

Impacts of severe winter weather on health outcomes can include increased falls and cold-related illnesses. In January 2024, emergency department visits for falls, cold-related illness and other health impacts increased during a severe winter weather event in the region.[170]

Potential Project Impacts

Severe storms or weather events could impact transportation and create barriers to access essential services in the region, such as healthcare. Bridge design should account for severe weather and flooding to minimize the impact of future events. The *DSEIS Climate Change Technical Report* provides an estimation of precipitation intensity and floodplains. However, the *Technical Report* may use outdated data sources and underestimate the future flood risk in the area, translating into greater vulnerability to health risks for bridge users and nearby communities.

The DSEIS *Climate Change Technical Report* notes a predicted increase in the intensity of precipitation during winter months and less snowpack across the Columbia River Basin. The cited model is current and consistent with other precipitation models in scientific literature.[171] Stormwater and flood management will be especially important to mitigate the effects of excess precipitation.

The Annual Exceedance Probability (AEP) is a statistical measure used to describe the probability of a specific event occurring in any given year. This statistic is often used to describe the probability of a severe flood. For example, floods with an AEP of 1% are often referred to as a “100-year flood”, or a flood with a 100-year recurrence interval. These estimates are updated regularly to adjust for changing climate and weather patterns.

The *DSEIS Climate Change Technical Report* provides 100-year recurrence interval floodplains mapped by FEMA corresponding to the immediate vicinity of the project area.[123(p6-6)] FEMA flood profiles are measured by FEMA flood insurance studies (FIS). The most recent FEMA FIS for Vancouver, Washington and Portland, Oregon references United States Army Corps of Engineers (USACE) studies from the 1970s.[172]

However, the USACE recently updated their AEPs for the Lower Columbia River Basin in 2022. In their report, the authors note that the FEMA effective flood profiles may not stay aligned with updates from the USACE. Furthermore, USACE estimates a higher water surface elevation corresponding to a 100-year flood than estimated by the annual FEMA effective FIS at the I-5 Bridge.[172(p72)]

The *DSEIS Climate Change Technical Report* does not specify the FEMA FIS year in their presented floodplains map and notes that "more of the study area will be subject to flood risk in the coming century". Still, the map may not accurately represent the region currently at-risk of damage due to a 100-year flood and requires further review.
See more in the Water Quality section.

Environmental Justice and Health Equity

Children, older adults, and people with compromised immune systems are more at risk of the health impacts of contaminated water.[165,173] Systemic underinvestment and outdated water system infrastructure in low-income communities can disproportionately expose these communities to unsafe water.[165] People with disabilities may face barriers to access risk communications or resources during severe weather events or climate hazards. Some people with disabilities may require ongoing medical care, which puts this population at risk during climate events that overwhelm the healthcare system or result in power outages.[174] People with limited English proficiency may face language barriers that restrict access to healthcare, social services, and risk communications.[135]

Mental Health and Climate Change

Literature Review

The impacts of climate change on mental health are a growing area of research. Severe weather and disasters can have immediate mental health impacts from trauma, loss of livelihood and displacement, such as shock, post-traumatic stress disorder (PTSD), and compounded stress and anxiety.[42,116] A 2021 scoping literature review by Charlson et al. found that many climate-related hazards were "associated with psychological distress, worsened mental health, and higher mortality among people with pre-existing mental health conditions, increased psychiatric hospitalizations, and heightened suicide rates".[139] While more gradual exposures to climate change (including increased temperatures, changes in weather patterns, etc.) and mental health impacts are less researched, chronic mental health impacts may include depression, anxiety, suicide, substance abuse, violence, and loss of personal and community belonging.[42] Further, sense of loss of environmental landmarks and place, impacts to plant and animal species, and other environmental effects may increase feelings of hopelessness, fear, and depression.[42,175]

Local Context

In the project area, an estimated 14% of adults reported poor recent mental health (Table 5).[23] The prevalence of reported poor mental health is comparable in Clark and Multnomah counties overall.[23] While these estimates are not specific to climate change, the current landscape of mental health in the region is consequential as climate change can disproportionately impact those with existing mental health conditions and/or contribute to new stressors and mental health impacts.

Potential Project Impacts

As previously stated, the DSEIS projects changes to climate across bridge construction and operation. The DSEIS *Climate Change Technical Report* did not include information about climate change impacts on mental health.

The IBR Program has the opportunity to influence climate change impact, community connectedness, safety, transportation, healthcare access (including access to mental health services), and the built environment through the project. All of these determinants can individually and cumulatively affect mental health.

Environmental Justice and Health Equity

Climate change impacts the natural environment, posing threats to mental, spiritual, and cultural health, wellbeing, and traditional practices among Tribal and Indigenous communities.[42,116,139,176] Climate change may exacerbate the impacts of intergenerational trauma and health inequities as a result of systemic racism and settler colonialism.[42,116,139] People with existing mental health conditions may be more impacted by trauma and distress from climate-related hazards or events.[42,139] Youth may be more at risk of climate-related mental health impacts, and are likely to experience more cumulative effects of climate on mental health in their lifetimes.[42,139,175]

Social Determinants of Health

The World Health Organization defines social determinants of health as “the non-medical factors that influence health outcomes” and estimates that between 30-55% of health outcomes are dependent on these determinants.[177] The term broadly encompasses social and environmental conditions – or the conditions in which people are “born, grow, live, work, and age”. This often includes neighborhood conditions, but also spans social factors like housing, education, and occupation. These systems affect health in complex and overlapping ways, often determining access to health-promoting resources. They also shape the level of stress someone experiences. Long term stress for social or environmental causes, like poverty or racism, activates biological systems that lead to inflammation, hormonal dysregulation, and chronic disease.[178]

In this analysis, we review housing and displacement, income and employment, access to greenspace, and Indigenous social determinants of health. It is important to note that transportation access is also a social determinant of health. Discussion of transportation access is in the *Transportation and Active Transportation* section.

Housing and Displacement

Literature Review

Housing influences health through four primary pathways: quality, affordability, stability, and location. Homes that are free of molds/pests and have essential amenities and thermal control promote good health. Housing that is located near healthy food options, parks, living wage jobs, and transit support access to health promoting opportunities and needs.[179] Affordability and stability are linked to health via stress. Expensive housing that leaves less budget for other needs, and the fear of losing housing, can lead to constant stress and cortisol release. Chronic stress contributes towards poorer mental health outcomes, reduced immune system function, metabolic and cardiovascular outcomes, and mortality.[180] Housing loss through foreclosure and gentrification-related displacement are associated with poorer well-being outcomes, including depression, anxiety, and self-reported health.[179,181]

Local Context

The IBR study area intersects with 14 neighborhoods in Clark and Multnomah County (ten and four respectively).

There are an estimated 1,366 people across the whole houselessness spectrum in Clark County, and an estimated 11,153 in Multnomah County.[182,183] Data on houseless community members is difficult to collect and maintain over time. Estimates included in Table 11 below come from the *DSEIS Equity Technical Report* and county point in time counts. Houseless residents are distributed throughout the IBR study area. The *DSEIS Equity Technical Report* Table 5-2 cites estimates that 349 houseless residents reside in Multnomah County in Inner Northeast Portland and North Portland, and 625 houseless residents in Clark County.[82(p5-5)]. These estimates come from point in time counts conducted in 2022 and are outdated, are likely undercounts, and do not delineate the full spectrum of people experiencing housing instability that reside in emergency or transitional shelters. There are two safe rest villages within the study area in North Portland (Sunderland RV park and N Portland Rd (in development)).

Table 11. Housing demographics in IBR Study Area, Clark County, and Multnomah County. Sources: ACS 5-Year Estimates 2018-2022[+75], CDC EJI [^23], DSEIS Equity Technical Report*[82], Clark County Point in Time Count[++182], City of Portland/Multnomah County Joint Office of Homeless Services Audit Report[^^183]

Mode	IBR Study Area	Clark County	Multnomah County
Total Housing Units[+]	12,651	196,557	317,308
Percentage who Rent[^]	52%	33%	43%
Percentage of Renters who are Paying at Least 30% of Household Income on Rent in the Past 12 Months[+]	50.1%	48.4%	48.9%
Percentage of Homeowners with Mortgage who are Paying at Least 30% of Income on Mortgage Payments in the past 12 Months[+]	23.3%	25.7%	30.1%
Houseless Populations	974 (2022)*	1,366 (2023)[++]	11,153 (2024)^^

Potential Project Impacts

The *DSEIS Environmental Justice Technical Report* Table 4-4 states the Modified LPA will displace people living in 43 residences through property acquisition.[98(p4-17)] The *DSEIS Equity Technical Report* details that the Modified LPA would displace 32 floating homes in North Portland Harbor.[82] On the south shore of North Portland Harbor, the Modified LPA would displace three floating homes and one residential unit on land. In Clark County, the Modified LPA would displace seven residences and include partial acquisition of 10 residential parcels for permanent right-of-way. The design option that shifts I-5 west would displace 33 residential units of the Normandy Apartments in the Esther Short neighborhood (*DSEIS Equity Technical Report*, Table 5-1).[82(p5-2)] These displacements could affect resident mental health by causing stress and anxiety regarding moving, disrupt existing social networks, and increase the distance to employment or regular essential services.

The DSEIS notes the IBR Program will follow the requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act (URA), a federal law that establishes minimum standards of support for persons displaced through property acquisition due to a federal project. The URA goals include providing relocation assistance and ensuring displaced individuals find decent, safe, and sanitary housing. For residential displacements, the IBR Program must provide relocation advisory services to displaced owners and tenants, give 3 months advance notice of property possession, and cover costs for moving and added costs of rent or purchase of comparable replacement housing.

Construction of the Modified LPA may cause the displacement of encampments in the area. Forced relocation can cause several harms of houseless community members, including the loss of personal belongings and needed medical items, displacement into more hazardous conditions, and disruption of community networks and social supports.[184] The *DSEIS Equity Technical Report* states understanding the full impact of the Modified LPA on the houseless community will require in-depth outreach with service providers and notes the IBR Program will coordinate with these organizations to offer services to unsheltered people that are directly affected by construction.[82(p5-5)]

Environmental Justice and Health Equity

The DSEIS states that acquisitions will cause displacement in the Esther Short, East Colombia, and Rose Village neighborhoods, high priority EJ areas. This could affect community cohesion and access to community resources and services. The analysis balances these impacts with non-specific improvements in transit access, reliability, and connectivity for all communities.

Aspects of the gentrification process like increased housing costs, sociocultural erasure, and transformation of available amenities affect physical and mental health, and create inequities between racial and class groups.[185] The *DSEIS Environmental Justice Technical Report* states that the Modified LPA could catalyze increases in property values and rents in affected areas. These increases in financial burden from rent and property taxes could create additional stress and worsen mental health.[186]

Income and Employment

Literature Review

Employment can introduce several health-promoting and health-negating factors into a worker's daily life that vary widely by sector and occupation. The cumulative net effects of employment contribute toward overall life and health span.[187] Income is the most strongly associated aspect of employment related to improved health outcomes and life expectancy, usually granting access to better medical care, housing opportunities, food security and other health-promoting basic needs.[188,189] Stability in job status protects mental health, while insecurity leads to stress, cortisol release, and associated health impacts.[190] Long commutes place time limits on workers. More time commuting typically means less physical activity, less time to prepare food at food, and less time to sleep.[191]

Local Context

A majority of workers that cross the I-5 bridge are Clark County residents commuting into Oregon (79%). The employment rate of the IBR study area is similar to Clark and Multnomah Counties overall (Table 12). Employment in the construction sector is slightly higher in the project area than the percentages in the surrounding counties. Life expectancy in the IBR program area ranges from 75 to 79. This is in the middle-to-lower ranges among life expectancy in Clark and Multnomah counties overall (Figure 4).

Table 12. Income and Employment Demographics in IBR Study Area, Clark County, and Multnomah County, ACS 5-Year Estimates 2018-2022

Mode	IBR Study Area	Clark County	Multnomah County
Employment Rate	95.4%	94.8%	94.5%
% Employment in Construction Industry	10.1%	9.2%	5.1%

Potential Project Impacts

The total program cost for the IBR Program is an estimated $6 billion. An investment of this size is expected to stimulate economic activity. The IBR Program estimates construction will drive $3.6 billion in net new economic activity and 13,460 new person-year jobs (one person working full time for a year). The program has committed to a 15% Disadvantaged Business Enterprise participation goal, will incorporate DBE best practices throughout program implementation, and will develop a DBE and capacity-building strategy to support economic opportunities for workers of color, workers with disabilities, and young workers.

Between 32-35 businesses and 600-742 employees are projected to be impacted due to property acquisitions required for construction. Table 13 outlines effects on businesses and employees. A majority of businesses impacted are in Multnomah County, but a greater share of workers employed in Clark County are projected to be affected. The *DSEIS Economics Technical Report* also notes additional businesses that remain may be affected as well if they find it difficult to attract or maintain customers either during the construction period or that traveled to the area for the original grouping of businesses that no longer remains.[192] Mitigations noted include a phased construction schedule to minimize business access impacts, as well as business outreach to identify additional supports for construction-related issues. The IBR Program must also comply with URA requirements for nonresidential displacements, which include provision of relocation advisory services, 3 months advance notice before land possession, and covering costs for moving and reestablishment expenses.

Table 13. Expected Business Displacements and Affected Employees, DSEIS Economics Technical Report[192]

Area	# of Businesses Displaced	# of Employees Affected	Notes
Oregon Mainland	7	41	Primarily marine-related light industrial and commercial-retail
Hayden Island	15	159	Primarily food service and retail that serves the island
Downtown Vancouver	10-13	400-542	Primarily commercial office and retail, larger range considers impact of I-5 Mainline Westward Shift option

The *DSEIS Economics Technical Report* states a potential concern related to business displacement is the need for employees to find new jobs.[192] This disruption in job stability could affect worker mental health. If these employees end up with longer commutes, they may have less time for health-promoting activities like sleep, healthy food preparation, or physical activity.

Environmental Justice and Health Equity

Communities that have greater income inequality tend to have poorer health outcomes.[193] There is a strong association between depression and income inequality, which disproportionately impacts women and people of color.[194] Upward economic mobility influence health and well-being. Economic mobility prospects matter for health and well-being. In the United States, incremental increases in early intergenerational upward mobility are associated with incremental decreases in mortality, with the greatest magnitude occurring for Black men.[195]

BIPOC community members, women, people with disabilities, LGBTQ+ groups, and single-parent households are more likely to experience poverty and face more barriers in finding and maintaining employment. In the region, people experiencing economic instability cite several conflating and intersectional barriers to stability, including housing instability, financial burden of medical care, discrimination, mental health concerns, individualist 'bootstrap' culture, inability to secure stable jobs with living wages, lack of insurance benefits, and limited advancement opportunities.[78]

The *DSEIS Environmental Justice Report* states that implementation of the Modified LPA would displace 10 businesses in the Esther Short neighborhood and 3 businesses in the Rockwood neighborhood (high-priority low-income neighborhoods), and no specific benefits to low-income or minority populations are projected. It also notes that the loss of service industry jobs on Hayden Island may disproportionately impact low-income and workers of color. The analysis states this loss is balanced by the non-specific jobs and economic development opportunities the project will bring for all communities. However, Modified LPA-induced changes in transit access to jobs is expected to have larger benefits for white, non-Hispanic residents in the study are than BIPOC residents, immigrants and refugees, and people under the age of 25.

Greenspace

Literature Review

Access to greenspace has been shown to have a positive impact on the health and mental health of both individuals and communities.[196,197] Some of the physical health benefits include decreases in cortisol, risk of diabetes, risk of preterm birth, in rates of hypertension, asthma, heart disease, and all-cause mortality.[197] Greenspace has also been linked to increases in physical activity. Studies have even compared the impact of walks in different urban environments and found that a walk on an urban road with trees resulted in significant decreases in tension, fatigue, and anxiety.[196] At the community level, greenspaces have been shown to increase social interaction and decrease social isolation, to improve air quality, reduce noise impacts, and reduce urban heat island effects.[197]

Access to greenspace has not been available to individuals and communities equally. “Most studies reveal that the distribution of such space often disproportionately benefits predominantly White and more affluent communities,” and this is “increasingly recognized as an environmental justice issue”.[198] While the benefits of access to greenspace have been shown over many studies, increasing greenspaces without seeing the larger context can create a paradox that may negate some positive impacts. Increases in greenspace can lead to increased housing costs that could "lead to gentrification and displacement of the very residents the greenspace strategies were designed to benefit”.[198]

Potential Project Impacts

The Modified LPA will change the connection to the Columbia River Renaissance Trail by making it both safer and wider.[199(p4-10)] This could have a positive health impact by increasing safety and connectivity to parks and trails. Other trail improvements included in the Modified LPA include: “improved intersections, sidewalks, and bike lanes” connected to the Discovery Historic Loop Trail, and an improved shared-use path through Old Apple Tree Park.[199(p4)] The Modified LPA includes “improved bicycle pedestrian, highway, and transit access” to parks in Portland and Vancouver “which could make access to parks easier”.[199(p6-1)] Increased access to parks and greenspace would have a positive impact on individual and community health.

The DSEIS indicates that noise levels could increase throughout many parks in the project area closest to the bridge and highway including East Delta Park, Fort Vancouver National Historic Site, Marshall Community Center, the Leupke Senior Center, Marshall Park, Clark County Recreation Fields, Leverich Community Park, Burnt Bridge Creek Trail, Kiggins Bowl Sports Fields and Stadium (IBR Parks and Recreation Technical Report). It also indicates that noise could decrease in the Lower Columbia River Water Trail, Lewis and Clark National Historic Trail, Vancouver Waterfront Park, Old Apple Tree Park, Arnada Neighborhood Park.[199]

See Noise Section for more information about health impacts of noise.

Indigenous Social Determinants of Health

Carroll et al. 2022 define Indigenous social determinants of health as "the conditions specific and unique to Indigenous communities that impact health and wellbeing".[200,201] While not a complete list, some of these conditions include: "Indigenous knowledge, language and identity, land and kinship, sovereignty, and structural and systematic factors".[200] The Seven Directions Center for Indigenous Public Health has identified these factors that contribute to the health of American Indian/Alaska Natives and acknowledges that this list may not encompass all of the important factors for all Indigenous communities.

"Indigenous communities support healthy vibrant lives embedded in their own Indigenous knowledge, values, and traditions. Even today, despite settle-colonial efforts to either wipe out or totally assimilate individuals and collectives, Indigenous nations continue to bring health and well-being to their communities and convey knowledge to future generations".[201] "Over the past 500 years, colonization weakened Indigenous systems that helped to maintain community health (e.g. traditional food systems, access to clean water, Indigenous languages, access to land) and replaced them with unsupported and underfunded systems, leading to disproportionate systemic health disparities, including some of the highest rates of diabetes, suicide, and cardiovascular diseases".[202] "Comprehensive community-driven, nation-based reclaiming and defining of Indigenous health and well-being is necessary to establish and address the broad array of determinants of health and well-being in Indigenous communities".[201]

The IBR Program poses a risk of disrupting connection to traditional cultural activities and could impact the ability to access culturally specific health care for American Indian/Alaska Natives. Many of the Cowlitz Indian Tribe's members reside outside of Washington and their access to their ancestral lands and ceremonies will be diminished and must be addressed in the planning of the project. Specifically, the impacts of tolling will increase the burden to tribal members traveling to access culturally specific healthcare, access cultural activities, and access ancestral land.

The IBR Program is engaged in tribal consultation with federally recognized tribes of Washington state and Oregon, and one tribe that is not currently a federally recognized tribe. Appendix A of the DSEIS describes the tribal consultation and process. It reiterates the commitment to government-to-government consultation with tribes and to incorporate input into decision-making processes. Our recommendations include encouragement to the IBR Program, and all partner agencies, to meaningfully engage in tribal consultation and implement input from tribes at every stage of decision-making to mitigate harm to American Indian/Alaska Native communities.

Water Quality

Literature Review

Safe and clean water is essential for the health of humans, animals, and the entire ecosystem. There are many ways that public health is concerned with clean water including sanitation, drinking water, fish and shellfish consumption, water recreation, and harmful algal blooms.

Drought is a public health concern that can impact water quantity and quality.[203,204] Decreased water flow in rivers and streams can concentrate contaminants, reduce nutrients, and lower oxygen levels – which all pose risks for water quality, aquatic life, and potentially human health.[205,206] Drought can also impact groundwater availability and aquifer recharge, which is an issue for populations reliant on water systems from groundwater.[205]

Climate change can affect water quality through warmer temperatures, changes to precipitation and severe weather, amount, timing and melting of snowpack, and availability of water.[207] Longer periods of heat and higher temperatures impact surface water temperatures of oceans, rivers, lakes, ponds, and streams. Warmer water temperatures can create more hospitable environments for harmful algae and other toxins. Some harmful algae can produce toxins and create "blooms" of cyanobacteria (harmful algal blooms, or HABs) that can make people sick when drinking, swimming, or recreating in contaminated water or eating fish that were exposed. Cyanobacteria exposure can lead to gastrointestinal illness, irritation of skin, eyes, nose, or throat, and potentially liver damage.[208]

Potential Project Impacts

The Troutdale Aquifer is designated by the United States Environmental Protection Agency as a Sole Source Aquifer and provides fresh water to the City of Vancouver. The water quality technical report notes that a "sole source aquifer report for the Modified LPA would be prepared and submitted to the EPA once the Draft SEIS is out for agency review." That information should be made available to the public to review for awareness of potential impacts and/or precautions being taken.

There is currently very little treatment of stormwater from the bridge into receiving waters. According to the *DSEIS Water Quality and Hydrology Technical Report,* the Modified LPA "includes a stormwater conveyance system" that "would reduce total suspended solids, particulates, and dissolved metals to the maximum extent possible before runoff reaches surface water or is infiltrated".[209(p4-1)] New and updated stormwater infrastructure that complies with all regulatory standards would have a positive impact on water quality.

The *DSEIS Water Quality and Hydrology Technical Report* Section 5.1.2 points out many potentials for negatively impacting water quality including contamination from equipment, groundwater contamination, contamination of surface water, turbidity in water, contamination of water due to disturbances in riverbed sediment during in-water work, and construction materials and byproducts falling into the river during construction and demolition.[194] While we appreciate that "all reasonable precautions would be taken to avoid and minimize water quality" at all stages of the project, the responsibility to protect water quality could not be more consequential.

Hazardous sediments and contaminants

Both the *DSEIS Water Quality and Hydrology Technical Report* (Section 5) and the *DSEIS Hazardous Materials Technical Report* (Section 5.3) discuss the need to sample and analyze the levels of hazardous sediments and toxic contamination.[53,209] We agree and advocate for sampling, testing, analysis, and publication of data to understand the potential contaminants and toxic material that could impact water quality during in-water construction. In our review of the DSEIS, we did not find a detailed plan for sampling and analysis of riverbed sediment prior to in-water work occurring. Our recommendations reflect the need to document and release a detailed plan to show any potential contaminants, hazardous sediment, and toxics so partners and the public can understand potential risks.

There are a number of waterways within the project area that are listed under 303(d) of the Clean Water Act for failing to meet water quality standards, including the Columbia Slough, Burnt Bridge Creek, Columbia River (including North Portland Harbor), and Fairview Creek (DSEIS Water Quality and Hydrology Chapter). Described in Table 3.14-2 of the DSEIS Water Quality and Hydrology Chapter, these waterways include pollutants such as toxics like polychlorinated biphenyls (PCBs), polycyclic aromatic hydrocarbons (PAHs), dichloro-diphenyl-trichloroethane (DDt) metabolites, vinyl chloride, and dissolved oxygen.[210] Projected impacts, if any, are not described in the DSEIS in relation to these pollutants and the potential for increased turbidity during in-water work.

Emerging contaminants

The *DSEIS Water Quality and Hydrology Technical Report* states that best management practices (BMP) have been shown to reduce many pollutants from runoff but the effectiveness of removing "polycyclic aromatic hydrocarbons (PAHs), microplastics, and constituents of emerging concern (CEC), including 6PPD-quinone, are less well known because the fate and transport of these pollutants remains unclear".[209(p3-5)]

6PPD stands for the chemical N-(1,3-dimethylbutyl)-N'-phenyl-p-phenylenediamine and is used on all kinds of tires to reduce degradation, or breaking down, which helps the tires last longer.[211]As tires drive on the road, small dust and particles come off the tires due to friction and contain 6PPD that is carried into waterways as stormwater runoff. 6PPD has been found to highly toxic to coho salmon and is killing fish before they can lay their eggs and killing juvenile salmon disrupting the lifecycle of this critical species. It is also harmful to other fish including rainbow trout and brook trout. The impacts of 6PPD on human health are still being studied.

Integrating stormwater best practices into the new bridge will help improve water quality and protect the waterway, the ecosystem, and human health. Since the understanding of these toxics, and their impact, continues to grow every day it is important for the program to actively seek out updates to best management practices from the Washington State Department of Ecology and Oregon State Department of Environmental Quality to reduce 6PPD and 6PPD-q. In 2022, directed by the Washington State legislature, the Washington State of Ecology published "6PPD in Road Runoff: Assessment and Mitigation Strategies."[212] This document suggests best management practices (BMPs) to reduce 6PPD including source control BMPs, flow control and runoff BMPs. The highest level of effectiveness of these practices would reduce 6PPD and would have a positive impact on ecosystem health.

The 10-year construction period of this project creates an opportunity to be adaptable to learning about and implementing new best management practices as the understanding of this critical issue develops.

Dust, construction and demolition
In addition to the air quality concerns posed by fugitive dust from construction and demolition, a fugitive dust plan should include assessment of dust makeup, impacts on water quality and mitigation that will be taken. The age of the current bridge brings concerns of the chemical makeup and potentially toxic materials used during the time period it was built, specifically lead and asbestos. Demolition of the current bridge over the water brings the potential for toxic fugitive dust to settle onto the Columbia River and negatively impact water quality, aquatic plant life, and animal species living in the river. There is not sufficient information in the DSEIS for analysis of the demolition plans or fugitive dust mitigation plan and how it could impact water quality.

Future water availability
The *DSEIS Climate Change Technical Report* includes "increased drought" as a regional hazard experienced currently or projected in the future.[123] The Project area may be impacted within the bridge's lifetime by drought conditions that affect water availability and water quality in the Columbia River, as well as in surrounding water bodies.

Environmental Justice and Health Equity

From our review, the DSEIS does not make a clear connection between impacts to water quality and equity priority communities. Overall, the information in the DSEIS suggests that new stormwater infrastructure in the Modified LPA would positively affect water quality, which would benefit the general population, inclusive of equity priority communities. Further, we were unable to conduct community engagement for this health analysis to gather community-based information about environmental justice and health equity concerns around potential water quality impacts. There are likely more connections between water quality, environmental justice, and health equity, particularly regarding subsistence fishing and Indigenous social determinants of health, that are important for the community and that we were unable to sufficiently assess. There is insufficient information in the DSEIS to assess potential environmental justice and health equity impacts on water quality.

Discussion

There is **sufficient evidence** in the DSEIS for the following potential health impacts of the Modified LPA:

- **Potential protective elements and positive health impacts**
    - **Transportation and active transportation:** The extension of light rail services and addition of enhanced pedestrian and bike facilities will likely increase physical activity and improve health. Expanding design and policy decisions that encourage people to walk, roll, bike, or use transit, rather than drive, would increase health benefits.
    - **Access**: Bringing the bridge, and auxiliary connections, up to or exceeding standards under the Americans with Disabilities Act (ADA) would improve access for all. Using inclusive or universal design, which centers around older adults, people with disabilities, and children, would increase benefits.
    - **Heat**: Providing shade and cooling for bridge users, especially active transportation users, could provide protection from heat-related health outcomes.
    - **Employment:** The project would drive a temporary increase in construction-related employment. Increased access to light rail and transit services could increase access to jobs and other essential services. Increasing contracting for Disadvantaged Business Enterprises, Minority Business Enterprises, Women Business Enterprises, and Small Business Enterprises would increase equitable distribution of these benefits.
    - **Access**: The Modified LPA includes plans to expand connections between active transportation networks, trails, and parks. Increased access to greenspace would have a positive impact on health.
    - **Water quality**: Improvements to stormwater infrastructure would have positive health impacts on water quality, and the health of the ecosystem.
    - **Safety:** Replacement of the existing I-5 bridge will result in a structure with greater seismic resilience, minimize the risk of a bridge collapse during an earthquake, and support safety, regional travel, and access to essential services.

- **Potential harmful elements and negative health impacts**
    - **Air quality:** Given the existing high traffic volumes along the I-5 interstate bridge, people who live nearby are subjected to greater concentrations of air toxics and are at risk of experiencing additional air quality burdens. The DSEIS estimates a 33% increase in VMT under the Modified LPA by 2045 and increase in freight traffic volumes, which could increase particulate matter and negatively impact air quality.
    - **Transportation and active transportation:** Transit access to jobs for BIPOC residents, immigrants and refugees, and people under the age of 25 did not increase as much as it did for white, non-Hispanic residents. This indicates disparities would continue to remain, likely reinforcing disparities in opportunities for physical activity.
    - **Tolling**: Tolling would have a disproportionate impact on low-income community members and could negatively impact access to essential services like health care and culturally specific health care.

- **Access**: Construction delays on roads, delays to bus routes and light rail service, and closures of sidewalks and active transportation paths may negatively impact access to homes, jobs, schools, health care facilities, and other essential destinations. These impacts may be greater for those that do not have car access.
- **Noise**: The Modified LPA would approach or exceed noise abatement criteria at 65 locations in Portland and 135 locations in Vancouver, including Discovery Middle School. Children and their learning comprehension are particularly affected by noise. The DSEIS describes higher levels of noise and vibration will negatively and disproportionately impact communities identified as equity priority communities.
- **Displacement**: The IBR Program will acquire land displacing 43 homes and could also displace houseless residents in the project area. Between 32-35 businesses and 600-742 employees could be impacted due to property acquisitions. Equity priority communities of East Columbia, Rockwood, Esther Short, and Rose Village would be disproportionately impacted.
- **Access**: The IBR Program could negatively impact access to traditional cultural activities, culturally specific health care, and access to ancestral lands for American Indian and Alaska Native communities.

There is **insufficient evidence** for several topic areas to determine potential health impacts of the Modified LPA.

- **Climate change and health:** The DSEIS anticipates the Modified LPA will reduce greenhouse gas emissions (GHG) compared to the No-Build Alternative. Construction of the Modified LPA will produce GHG emissions. Several climate-related hazards are projected to impact the region throughout the construction and operation of the Interstate Bridge, including heat, wildfire smoke, severe weather and flooding. The health effects of climate change are not equally distributed, and several communities are disproportionately affected by climate change - including IBR Equity Priority communities. More information is needed about how the Program will mitigate climate change impacts to Equity Priority Communities and what protective elements for health and climate justice will be included in final design and construction plans.
- **Air quality:** Due to the large geographic area used to conduct the air quality analysis, and the statement in the DSEIS that localized health impacts due to air quality cannot be reliably quantified, more information is needed to reliably assess air quality impacts. This is the basis of our recommendation for air quality monitoring and further air quality assessment, including dispersion modeling. Air dispersion modeling incorporates data appropriate for analyzing potential health impacts on a local scale.
- **Road safety:** The DSEIS states that crashes will increase by 15% under the Modified LPA, mainly due to estimated increases in traffic volumes. The DSEIS does not provide clear information on how crash frequency would change by travel mode, crash type, severity, location, or for environmental justice communities. There is insufficient evidence in the DSEIS to conclude to what degree severe injury and fatalities would be reduced for active transportation users.
- **Fugitive dust**: There is insufficient information about mitigation plans for fugitive dust during construction and how that could impact air quality and water quality.
- **Water quality**: There is insufficient information in the DSEIS regarding a plan to sample and analyze hazardous sediments and toxic contamination prior to in-water work.

Addressing the gap of insufficient information

As identified above, there are a number of places throughout the DSEIS where there is insufficient information to determine health impacts. There are also many decisions to be made for the final EIS, design decisions, and local decisions that could change the assessment of the project having either a positive, negative, or neutral impact to health. At this stage, we are only able to comment on the current proposal, but want to note the potential for changes throughout the design and construction phases of this project.

A project of this scale is composed of large-scale decisions that on their face could be beneficial for health, such as improvements to active transportation. However, implementation of these decisions and plans has the potential to tip the scales one way or the other toward improving or harming health. To continue the example of expanded active transportation, if bike and pedestrian paths are implemented in a way that makes those paths safe, accessible, connected to essential services, and free from exposure to pollution and noise, then they could have a positive health impact. If they are implemented in a way where there are no sight lines from vehicles, budgets for active transportation are cut to prioritize lanes of vehicle traffic, and there is high exposure to noise and traffic pollution, then they could have a negative health impact.

There is opportunity at every stage of this project to prioritize the health and safety of the citizens of Washington, Oregon, and anyone using the bridge. That is why our recommendations fall under the general categories of designing with health in mind and constructing with health in mind, so that the program can prioritize sustainability and health throughout the lifetime of the project. In addition to our recommendations, we propose that the IBR Program adopt a “health in all policies” approach into their decision-making.

Addressing Environmental Justice and Health Equity

Through program policy and implementation, the IBR Program has the opportunity to make positive changes and take action toward equity in affected communities. The decisions that could positively impact health in a community can also provide other co-benefits that further equity and environmental justice. For example, since communities of color experience a stronger urban heat island effect, program decisions that increase tree canopy cover could provide multiple benefits including reducing the urban heat island effect, improving air quality, positively impacting ecological health, improving access to active transportation with increased shade cover, and improving mental health benefits.

When weighing design and policy decisions, a health in all policies approach allows the decision to be evaluated for potential co-benefits of each decision. Decisions that increase environmental justice and health equity should be prioritized due to the co-benefits of improving community and ecological health.

There are many places throughout the DSEIS where the Program notes disproportionate impacts to equity priority communities. While mitigation of harm is the most important, it is also the minimum that the project could strive for. Every instance of disproportionate impact is the roadmap to show where increased benefits could be concentrated.

Health in all policies approach + Meaningful community engagement and tribal consultation
This health analysis and our recommendations reflect the importance of a health in all policies approach through this and upcoming stages of decision making. “Health in all policies is a collaborative approach to improving the health of all people by incorporating health considerations into decision-making across sectors and policy areas”.[213] Health in all policies is a framework, while health impact assessments are the tool, but both have a shared goal of presenting evidence-based health information to decision-makers.

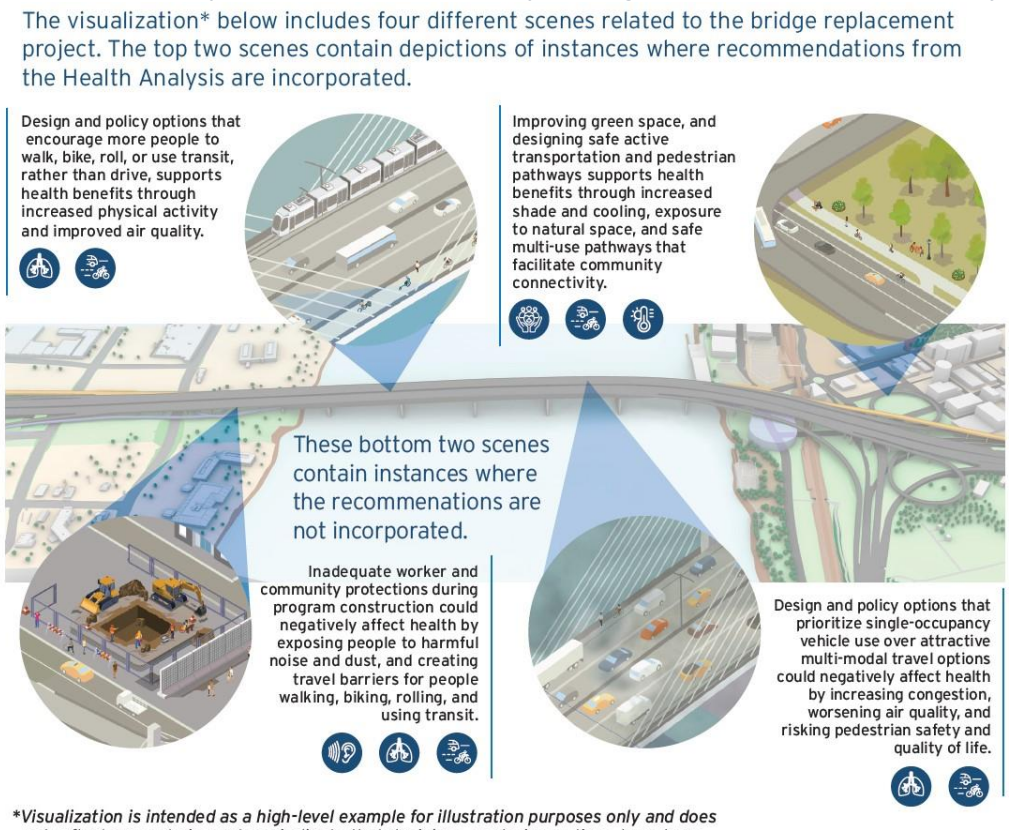
As described previously, individual and community health are made up of intersecting influences such as the built environment, current and historical disparities, and cumulative impacts of these many factors. To fully realize health equity, the public health system needs to be integrated with other systems that impact health, such as transportation. This approach allows for opportunities for collaboration to solve complex problems, identify and work toward shared goals across agencies and projects, and de-silo efforts to allow for more innovative and efficient use of resources.[214]

The IBR Program has an extraordinary opportunity to adopt a health in all policies approach throughout the design and construction phases of the project so that the lifetime impact of this project is positive. We are ready to continue to support the important work to ensure the equitable distribution of the transportation, economic, ecological, disaster resilience, and other benefits of replacing the Interstate Bridge between Washington and Oregon.

Our recommendations reflect the shared public health values of health equity, environmental justice, and ecological health. Each recommendation touches on one or more of our topic themes of air quality, transportation and active transportation, climate change and health, noise, social determinants of health, and water quality. Under each general recommendation there are more specific and tangible recommendations for implementation.

We appreciate any and all feedback from the IBR Program about our assessment. We also look forward to a detailed response about which recommendations the program plans to adopt, and how they will implement them.

Figure 16: Visualization of potential cumulative effects of implementing recommendations of the Health Analysis



**Visualization is intended as a high-level example for illustration purposes only and does not reflect property impacts or indicate that decisions on design options have been made. River crossing graphic adapted with permission from the IBR Program.*

Recommendations

To reduce negative health impacts of the IBR Program, we recommend decision-makers design, construct, and maintain a program that prioritizes human health and safety, ecological health, and environmental justice.

Our recommendations are organized in four themes:

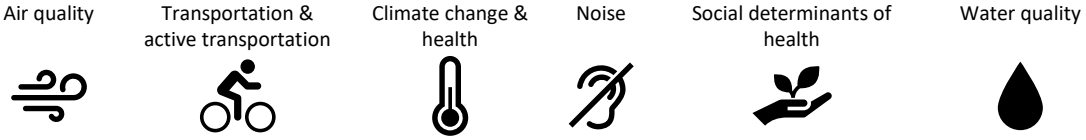
- Prioritize sustainability, transparency, communication and health for the lifetime of the project (p. 79-80)
- Provide additional information and modeling to better understand potential health impacts (p. 81)
- Design with health and equity in mind (p. 82-86)
- Construct with health and equity in mind (p. 87-89)

Our recommendations are guided by the following principles:[101]

1. Equitably reduce environmental exposures. Reducing environmental exposures in one area should not come at the expense of increased environmental exposures in another area.
2. Promote interventions to reduce environmental exposures, improve health, equitably distribute benefits, and monitor impacts on health outcomes.
3. Coordinate approaches to control environmental health risks across sectors.
4. Inform and involve communities that are affected by changes in environmental exposures.

Recommendations were developed and informed by peer-reviewed literature, best practices from previous health impact assessments on similar transportation infrastructure projects, and potential health impacts and mitigation identified during assessment of the DSEIS and other identified sources.

An icon or multiple icons accompany each recommendation. The icons indicate which topic area and associated health outcomes could be improved by implementation of the recommendation.



Prioritize sustainability, transparency, communication and health for the lifetime of the project

Transparency is central to building and maintaining trust. Community members will be affected by the IBR Program. It is critical that community members are both able to access information about how the program will affect them and able to share information, complaints, or questions with the program about how the program is affecting them.

The following recommendations support transparent communication and prioritize health during the lifetime of the program:

1. **Institute accessible systems for real-time two-way communication about project design and construction impacts to keep community members informed of project impacts, and the program informed of community impacts.**
    a. All communications materials should be written in plain language, available in multiple languages, and compatible with assistive technologies.
    b. With implementing agencies and contractors, coordinate a communication plan with multiple accessible platforms (e.g., website, social media, email and physical newsletters, text alerts, hotline) that are updated in real time so that the community can know when and where construction is happening; expected changes to transit, driving, or pedestrian routes; potential environmental impacts; and who to contact with questions, comments, or concerns.
        i. This should include notifying specific audiences with construction schedules well in advance: 1) emergency responders so they can be prepared during an emergency; 2) pedestrians and cyclists to know when it is safe to traverse portions of the road or access detours; and 3) affected residents, businesses, and commercial properties.
        ii. Communicate with community members and affected residents on types, time, duration, and potential health effects of construction well before and throughout construction activity. This should include details about noise, air quality, transportation and active transportation impacts.
        iii. Develop and maintain a centralized hotline and website for complaints, questions, or issues during and after construction. This should include coordinating with agencies responsible for controlling environmental exposures (e.g., noise, dust) during planning and construction and when responding to complaints.
        iv. Use visual technology such as 3D models and QR codes placed around the project area to help with visual understanding of design and construction plans.

2. **Prioritize health in program policies and decision-making throughout the lifetime of the program by incorporating regular engagement with community members, health department staff, and Tribal governments.**
    a. Provide funding to maintain health analysis team to continue to track and identify opportunities to include public health recommendations into the project. This can include:
        i. Incorporating health department staff into ongoing design committees or advisory councils
        ii. Proactive engagement and communication between program staff and public health to identify decision points and opportunities for health-focused decision-making well in advance
    b. Develop a monitoring, evaluation and reporting plan with clear responsibilities and accountability for the lifetime of the program. This should cover:
        i. Health, health equity, environmental justice and environmental indicators affected by the project, including health topics identified in this assessment and other topics that community and Tribal partners identify
        ii. Agencies responsible for measuring those indicators
        iii. Summaries of community complaints or comments and actions taken by the program or partner agencies to address them
        iv. Monitoring and timely reporting of any project-related issues that are context- and location-specific to support rapid response and reduce additional issues, including:
            1. Any injuries that are work related, transportation related, or non-workers injured in the project areas
            2. Any project-related noise, dust, emissions, or other environmental exposure disturbances
    c. Both before tolls go into effect, and after tolls are operational, ODOT and WSDOT should maintain a toll equity accountability committee or establish another structure where equity voices are at the table in a consistent, transparent, and resourced way to ensure long term accountability.
        i. Implement best practices from the Equity and Mobility Advisory Committee recommendations to the Oregon Transportation Commission.[215]

Provide additional information and modeling to better understand potential health impacts

Developing and sharing enhanced assessments of estimated impacts of the IBR Program on residents, people passing through and near the project area, and workers will increase the opportunity for incorporation of tailored strategies that more adequately protect health at the individual, project, and systems levels.

3. **Compile and release to the public more information about demolition plans for the current bridge infrastructure, including potential air quality, noise, and water quality impacts. This could include:**
    a. A detailed noise assessment and mitigation plan with noise heat mapping, predicted noise levels, and any overlap in noise-emitting activities with construction (e.g., if demolition and new construction are happening at the same time).
    b. Details about materials in existing infrastructure that could release contaminants into the air upon demolition, including lead and asbestos, and a detailed mitigation/abatement plan.
    c. Details about materials in existing infrastructure and the riverbed that could release sediments and contaminants into the water upon demolition, and a detailed mitigation/abatement plan.

4. **Expand information about potential air quality, safety, and connectivity impacts of design and construction.**
    a. Include air dispersion modeling of potential impacts of construction-related traffic diversion through neighborhoods adjacent to the project area.
    b. Include analysis of potential disruptions to regular transit, road, and active transportation routes that may affect community members' access to workplaces, health care services, social services, and other community services.
    c. Include analysis of severe injury and fatalities reduction for active transportation users and detail about mitigation features to prevent injury and fatalities.
    d. Collect and include pedestrian and bicycle counts from days where environmental threats (i.e., wildfire smoke) are not influencing travel behavior.

5. **Compile and release to the public additional information about potential air quality, safety, and connectivity impacts of tolling-related traffic diversion through neighborhoods.**

6. **Develop and release to the public a detailed sampling and analysis plan of riverbed sediment including potential contaminants, hazardous sediments, and toxics.**

Design with health and equity in mind

Design decisions early on are an important opportunity to make upstream, preventive health interventions that support healthier communities. Intentional planning with an environmental justice lens provides the opportunity to not only prevent disproportionate harms from design, but to address past harms and current disparities through infrastructure investments. Designing the IBR Program area with health at the forefront will be more beneficial to the community for decades to come.

The following recommendations prioritize health through program design:

7. **Design active transportation (bike lanes, sidewalks, and multi-use trails) and public transportation that is accessible to all to improve air quality and physical activity.**
    a. Design decisions should prioritize transportation system designs that reduce vehicle miles traveled, reduce single-occupancy vehicle capacity, increase physical activity, and increase access to transit.
    b. The design team should make considerations to include light rail station investment and design that encourage walkability and accessibility in surrounding areas. They should account for increased utilization, and opportunities for shade and cooling to protect users from heat.[216]
    c. Sidewalk and active transportation design should be centered around older adults, people with disabilities, and people with children, also known as inclusive design or universal design.

8. **Design safety features to reduce injury for active transportation users and vehicle users.**
    a. Design should prioritize pedestrian safety and active transportation user safety by integrating design features to reduce vehicle speeds. The design team should use a safe systems and health impact pyramid lens to evaluate ongoing transportation infrastructure decisions to reduce risk to all users.[84,85]
    b. Create active transportation spaces that feel safe and increase visibility. Use signage, lighting and lane markings on shared use paths to reduce the risk of bicycle-pedestrian, vehicle-pedestrian, and vehicle-bicycle collisions.
    c. Design and install suicide barriers that are tall and unclimbable. Install appropriate multilingual signage displaying the 988 National Suicide Prevention and Mental Health Crisis Hotline as required by Washington RCW 39.04.420.[217]

9. **Improve greenspace and tree canopy cover to improve air and water quality, provide shade, and increase natural spaces.**
    a. Use green infrastructure to improve air quality, infiltrate stormwater, increase climate resilience, improve habitat for wildlife, and increase physical activity.[218]
    b. Use landscaping materials throughout the project area, along sidewalks, roadways, trails, shared use paths, and at transit stops to soften the concrete footprint and reduce the urban heat island effect.
        i. Use native drought- and pest-resistant vegetation to support climate resilience and local biodiversity.
    c. Coordinate with the City of Portland and City of Vancouver to meet or exceed local tree canopy cover goals of 28%-33% in the project area, reduce the urban heat island effect, create shade, and reduce potential erosion into surface water.[219,220]
        i. Reduce removal of existing trees, vegetation and greenspace, and include provision of tree canopy, vegetation, and/or bridge shade structures to create shaded area for respite from heat and sun exposure.[221,222]
    d. Reduce large expanses of pavement and impervious surfaces to limit stormwater runoff and reduce urban heat island effect.

10. **Design with sustainable materials and standards to reduce greenhouse gas emissions.**
    a. Follow sustainability guidelines outlined in local government jurisdictions' sustainability and climate action plans to reduce the effects of climate change on health. The IBR Program should score highly in quantifiable sustainable practices associated with roadway design and construction.[221]
        i. For example, following the Greenroads Rating System, the IBR should score 80 points or higher.[223]
    b. Develop and implement a preferred scenario that meets or surpasses the greenhouse gas emissions reduction target set for the region to reduce the effects of climate change on health. Refer to local cities, counties and state climate action plans and requirements regarding greenhouse gas emissions, where applicable.[224–226]

11. **Prioritize resilience to extreme weather events, climate change, and seismic events to improve safety.**
    a. Develop spaces, pathways, and other facilities built to withstand extreme weather events and changes in climate (e.g., heat waves, wind and ice storms, flooding, sea level rise and storm surge, extreme rainfall) to adapt to climate change, and to prevent injury, illness, and death from extreme weather.[123,222]
        i. This includes design that makes it easier and quicker to clear ice, snow, and other extreme precipitation from pathways.

12. **Maintain and improve good air and water quality in the project area to protect physical and mental health.**
    a. Use innovative storm water management practices along the corridor to sustainably reduce vehicle pollution from entering waterways to prevent water contamination and waterborne illness.[221]
        i. Plan for more severe and frequent storms/precipitation to limit increases in stormwater runoff.
        ii. Reduce exposure of vehicle runoff infiltrating the water system.
        iii. Treat stormwater runoff from all areas impacted by the IBR Program.
    b. Maintain wetland water quality and protect/repair nearby wetlands.
    c. Follow all federal, tribal, state, territorial, and local requirements around water quality to protect aquatic life, local wildlife ecosystems and prevent water- and foodborne illness.
    d. Use innovative design features to improve air quality for active transportation users along the corridor. This could include planting vegetation between shared use paths to improve air quality and provide additional protection from vehicles.
    e. Follow all federal, tribal, state, territorial, and local requirements to protect and improve air quality.
    f. Protect and honor Native water rights by contributing to a healthy river and healthy ecosystem because “the ability to exercise these treaty rights to fish is completely dependent upon clean water and healthy ecosystems”.[227]

13. **Minimize noise in the project area to protect nearby neighbors and populations disproportionately affected by noise.**
    a. Re-examine mitigation measures for the 65 locations in the Portland project area and 135 locations in the Vancouver project area that will exceed noise standards under the Modified LPA as a way of protecting the health of residents in these areas.
        i. Re-examine mitigation measures for Discovery Middle School. Children and their learning comprehension are particularly affected by noise. If project design is unable to reduce noise exceedances for Discovery Middle School, work with Discovery Middle School to implement appropriate sound insulation as per ODOT and WSDOT noise mitigation considerations (e.g., ventilation systems, storm windows, air conditioning).
    b. Use multiple methods (e.g. freeway lids, noise walls, quieter pavement, landscaping) to reduce noise in the project area for the lifespan of the project and for all bridge users (pedestrians, cyclists, local businesses, residents).
        i. Design sound walls, and other noise reduction strategies, should prioritize the reduction in noise and be sure not to result in additional problems like disruptions of sidewalks and trails, barriers to community connectivity, or creating large concrete structures.
    c. Help residents implement noise reduction strategies before construction begins: identify and work with highly affected residents to determine mitigation during construction, such as installing double pane or sound- and dust-proof windows, installing air conditioning, sealing doors and windows, and reinsulating walls and ceilings; and providing hotel vouchers during the noisiest/overnight operations if certain noise levels are exceeded.[228]
        i. Consider lessons from the Port of Seattle Sound Insulation Repair and Replacement Pilot Program assessment (expected in 2025) as a potential model for a residential noise insulation program by a major transportation infrastructure project/port.[229]

14. **Improve connectivity and community cohesion to promote access to community and essential services.**
    a. To support reductions in racial health disparities, prioritize active transportation and transit connections to important destinations to support place-based physical activity, especially destinations identified by BIPOC communities.[230]
    b. Maintain access and, where possible, increase connectivity to key neighborhood services and assets by promoting street connectivity and walkability.[74] These include parks, schools, worksites, libraries, grocery stores, food pantries, restaurants, banks, social clubs, gas stations, laundromats, post offices, places of worship, harvesting and fishing sites, cultural and natural landmarks, hospitals and healthcare facilities, including behavioral health and substance misuse treatment facilities.
    c. Create activity-friendly routes (i.e., pedestrian, bicycle, or public transit access) that allows for multiple and convenient route options to everyday destinations by walking, biking, and rolling.[74]
    d. Use design elements (e.g. freeway lids, pedestrian bridges) to improve East/West connectivity and accessibility within the program area.
    e. Incorporate design elements that highlight local art, history, and culture, including naming the bridge, to enhance community connection.

15. **Center equity and focus on local businesses in contracting to improve economic opportunities for underrepresented groups.**
    a. Identify and commit to a plan for increasing the contracting opportunities for Disadvantaged Business Enterprises, Minority Business Enterprises, Women Business Enterprises, and Small Business Enterprises that are awarded contracts for designing, building, and operating the program.[215]
    b. Consider abiding by the Washington State Healthy Environment for All Act that establishes a "goal of directing 40 percent of grants and expenditures that create environmental benefits to vulnerable populations and overburdened communities".[231(p1)]

16. **Minimize home and business loss, and proactively support displaced residents, businesses, and employees.**
    a. Before property acquisition and displacement begins, develop and implement comprehensive strategies and funding options to address the relocation and housing needs of people displaced by the program, including housed and unhoused community members. These should build on and provide a holistic approach to Uniform Relocation Assistance and Real Property Acquisition Policies Act (URA) requirements and the objective to lessen the emotional and financial impact of displacement. This could include:
        i. Ensuring continued access to local and culturally important food, transportation, health care, and social services to displaced people and families.
        ii. Evaluating the feasibility of 'Right to Return' options for displaced residents, either in continued housing relocation assistance or in new housing options if any are developed using project funds.
        iii. Working with families and neighbors to assist with coordinated relocation for those that are interested, and to maintain community linkages because moving can be particularly difficult for children and older adults.
        iv. Working with families to relocate within their child's school district, and if possible, moving over the summer as not to disrupt school year learning.
        v. Working with organizations like the Council for the Homeless and Columbia River Mental Health to develop strategies and investments to support the movement of people experiencing homelessness within the project area into housing and avoid further stress, traumatization, and distrust of government. Partner with homeless service providers to conduct outreach and to identify accommodation and support strategies to assist people in finding permanent housing options.[232]
        vi. Assisting displaced residents to find housing options for rent or purchase within the project area that meet their accessibility needs, health and safety needs, and are sustainable. This includes that homes are LEED certified, lead abated, and remediated for mold; have heat pumps, screened windows, air filters, ventilation; and are pet-friendly for individuals and families with pets.
    b. Identify strategies to reduce business impacts like business and employee displacement. This could include assistance and support to displaced employees in the job search, and displaced businesses in searching for new properties that meet their needs.
    c. Identify strategies to provide mental health and other support services to individuals who will be displaced from their home or disconnected from their social network due to residential or business displacement, at no cost to the individual.

Construct with health and equity in mind

Construction is expected to take approximately a decade. It is important to center worker and community health in construction plans, contracts, and operations.

The following recommendations prioritize health during the multi-year construction phase of the program:

17. **Meet and exceed, where possible, state and local requirements for noise, air quality and water quality to protect the health of workers, community members, and the ecosystem.**
    a. Ensure that construction vehicles meet state and local requirements for clean diesel contracting, and retrofit diesel construction vehicles to curb air pollution prior to the start of construction.
    b. Maintain construction equipment in good working condition to reduce emissions and noise.
        i. Reduce traffic-related air pollution from combustion of fuel, tire wear and brake wear during operation of the project.
        ii. Use approved noise control devices for generators, compressors, and similar equipment. Use OHSA approved broadband back-up warning devices on all construction vehicles and equipment.
    c. Develop a workforce transportation plan with contractors (e.g., incentivize active transportation and public transit options, carpooling) to reduce expected increased single-occupancy vehicle transportation to construction sites, and to reduce noise, air pollution, and GHG emissions.
    d. Adjust the construction schedule to maximize quiet time for residents.
        i. Limit loud-noise construction activities performed within 300 meters of an occupied dwelling unit between 7:00pm and 7:00am, as reported as noise abatement time constraints in the DSEIS.
        ii. Limit the operating periods for equipment that produces loud noise, such as pile drivers and concrete cutters, particularly during nighttime periods.
    e. Measure employee noise exposures and implement a hearing loss prevention program per state and federal noise level regulations over an 8-hour shift. The recommended exposure limit is 85 dBA over an 8-hour period.
    f. Limit in-water operations to November 1 – February 28 to protect fish, wildlife, and habitat resources per Oregon Department of Fish and Wildlife and U.S. Army Corps of Engineer regulations.[233,234]

18. **Design and mark routes during construction to protect pedestrians and active transportation users from injury and environmental exposures.**
    a. Develop safe and clearly marked alternative routes and maintain temporary paths for pedestrians, bicyclists, strollers, wheelchair users, and other active transportation users during the construction period, rather than simply closing sidewalks and bike lanes.
        i. Coordinate with and incorporate adjustments for ongoing and future Safe Routes to Schools efforts and for bike bus groups used by both adults and children in the project area (for example, Bike Bus PDX[235]).
    b. Direct alternate or detour vehicle routes away from high pedestrian areas, schools, places of worship, and other community centers to decrease likelihood of vehicle-related pedestrian injury.
        i. Include speed abatement measures (ex. speed humps, temporary signals, reduced speed limit signs) to reduce potential for crashes and injury.
    c. Reduce construction hazards to motorists, pedestrians, and cyclists from hazards such as large dust and debris "kickup", concentrated air pollution, and excess noise that could lead to unsafe areas and elevated exposures.

19. **Maintain community connectivity through reliable access to transit, neighborhood services, and regular transportation routes.**
    a. Reduce obstacles to business access, local and culturally important food—including harvesting and fishing sites—transportation, health care services, schools, places of worship and other essential community services during construction.
    b. Increase transportation assistance programs during construction to reduce disruption in accessing medical care, behavioral health care, social and educational services, especially for older adults and people with disabilities. Expand those programs and financial assistance.

20. **Protect workers and community members on high-risk days for high heat and poor air quality events.**
    a. Create and implement plans for extreme heat during the construction period, including recommended or designated times for active transportation users to travel through the project area during cooler times of day to prevent heat-related illness and death.
    b. Utilizing Washington State Department of Health guidance, take steps to reduce construction-related air pollution on days when the Air Quality Index reaches 'Unhealthy for Sensitive Groups' due to wildfire smoke or high ozone to protect outdoor workers and communities at increased risk.[236] WADOH guidance available at https://doh.wa.gov/sites/default/files/2024-06/821-174.pdf.
    c. Create and implement plans to ensure worker safety and protection, accounting for overlapping exposures, health sensitivities, and disproportionate impact to outdoor workers, including easy and reliable access to personal protective equipment.[152,162]
        i. Ensure that workers understand their rights, have adequate access, and have training to take protective steps with respect to climate hazards, such as extreme heat and severe weather, wildfire smoke, and air pollution exposure. These include access to water, shade or cooling, breaks, bathroom facilities, and personal protective equipment.[237,238]

21. **Establish systems for continuous monitoring for noise and air quality during and after program construction, ensuring that pre-construction conditions are measured as a baseline.**
    a. Use the World Health Organization's most recent Air Quality Guidelines and the Oregon Air Toxics Benchmarks to track air quality indicators near the project area and in neighboring communities.
    b. Coordinate with Washington State Department of Ecology, Oregon Department of Environmental Quality, Southwest Clean Air Agency, and community members to install and regularly analyze data from air quality monitors in the project area. This may include funding installation and maintenance of air quality monitors in the project area.
    c. In line with recommendation 1 above, identify a point of contact and appropriate communication methods for community members to use if they have questions or complaints about noise or air quality.
    d. Coordinate with schools, early learning facilities, and childcare facilities to install noise and particulate matter monitors at sensitive locations in the program area. Expand collection of noise measurements to include schools and early learning facilities near the program area beyond but inclusive of Discovery Middle School.

22. **Implement workforce development and support programs to develop and retain a diverse workforce.**
    a. In accordance with the recommendations of the IBR Workforce Market Study, develop comprehensive workforce development programs, including higher education, internships, apprenticeships, and targeted training in high-paid trades, with a focus on increasing BIPOC, underrepresented, underserved community participation and preparing students in high schools and community colleges for construction and trade jobs.[239]
    b. Prioritize services and policies for working families and caregivers, including childcare, and access to breast and chest feeding and pumping space.

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Appendix A

Additional Details on Methods

1. IBR Program data sources
    a. The working group reviewed select draft technical reports and chapters from the draft DSEIS prepared in February 2024 and then cross-checked with DSEIS documents published in September 2024, including:
        i. Acquisitions Technical Report
        ii. Air Quality Technical Report
        iii. Climate Change Technical Report
        iv. Climate Change Chapter 3.19
        v. Economics Technical Report
        vi. Energy Technical Report
        vii. Environmental Justice Technical Report
        viii. Equity Technical Report
        ix. Hazardous Materials Technical Report
        x. Neighborhoods and Populations Technical Report
        xi. Noise and Vibration Technical Report
        xii. Parks and Recreation Technical Report
        xiii. Transportation Technical Report and Appendices
        xiv. Transportation Chapter 3.1
        xv. Water Quality and Hydrology Technical Report
        xvi. Water Quality and Hydrology Chapter 3.14
        xvii. Wetlands and Other Waters Technical Report
    b. The working group consulted with writers of the DSEIS technical reports to ask questions and clarify technical information.
2. Baseline conditions & health pathways
    a. Methods:
        i. Literature review of meta-analyses & systematic reviews of topic indicators (exposures) and associated health outcomes
        ii. Description of baseline health conditions using comparable local data (state/regional or national as backup to comparable local data option)
            1. CDC EJI
            2. ACS Census
            3. CDC SVI
            4. CDC PLACES
            5. Additional data sources (sources listed in text)
3. Environmental justice & health equity
    a. Methods:
        i. Describe any known environmental justice and health equity topics addressed in the literature review and as they relate to information in the DSEIS
        ii. Describe EJ and health equity details using national mapping data (CDC EJI, additional data sources)
4. Recommendations
    a. Determined by assessment findings
    b. Review of existing HIAs conducted on transportation infrastructure projects of similar scope

i. SR 520 Health Impact Assessment: Puget Sound Clean Air Agency, Public Health Seattle & King County. *SR 520 Health Impact Assessment*.; 2008. https://drive.google.com/file/d/1UWSOxTsFcgLTTR1lBmjr-PPTZEGJ0Rnj/view?usp=sharing&usp=embed_facebook
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c. Recommended by phases of project:
i. Program design
ii. Contracting & construction (up to 10 years)
iii. Program lifetime (50-100 years)

November 15, 2024

Thomas Goldstein, PE, IBR Program Oversight Manager, Federal Highway Administration
Jeffrey L. Horton, PE, Regional Engineer, Federal Transit Administration
Chris Regan, IBR Environmental Manager, Interstate Bridge Replacement

RE: Health Analysis of Interstate Bridge Replacement Program Draft Supplemental Environmental Impact Statement EIS #20240163

Dear Mr. Goldstein, Mr. Horton, and Mr. Regan,

Thank you for the opportunity to comment on the Interstate Bridge Replacement (IBR) Program Draft Supplemental Environmental Impact Statement (DSEIS). In late 2023 IBR Program partners requested that an independent health impact assessment (HIA) be prepared to understand the Program's potential effects on community health and well-being.

The Washington State Department of Health, Oregon Health Authority, Clark County Public Health, Multnomah County Health Department and Cowlitz Indian Tribe Health and Human Services recognized the importance of the bridge replacement program to advancing health, equity and environmental justice in the region and in early 2024 agreed to work collaboratively to respond to this request. Our agencies further agreed to the IBR Program's request to complete an analysis for submission as a comment to the IBR Program's DSEIS. To meet this goal, our agencies have conducted a modified health analysis relying on literature review, existing data, and public health best practices, as the timing would not allow completion of a full HIA.

As one of the largest infrastructure projects in the region, the IBR Program provides tremendous opportunity to positively impact residents' health and advance environmental justice and equity. We believe incorporating public health as a core value of the IBR Program now and throughout its decade-long design and construction is vital to achieving these shared priorities.

The attached Interstate Bridge Replacement Program Health Analysis includes evidence-based information about potential health impacts related to air quality, transportation and active transportation, climate change and health, noise, social determinants of health, and water quality. It concludes with detailed recommendations that we encourage the IBR Program to consider implementing to improve health through design, construction, and the lifetime of the project.

We appreciate the opportunity to provide this analysis as a formal comment to the DSEIS. The contributing agencies and governments may have additional comments for the IBR Program. We are ready to continue to support the important work to ensure the equitable distribution of the transportation, economic, disaster resilience and other benefits of replacing the Interstate Bridge between Oregon and Washington.

Sincerely,

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Interstate Bridge Replacement Program **Health Analysis**

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November 15, 2024

DOH 334-565 November 2024

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These health agencies formed a health analysis working group and began meeting in January 2024. This report will refer to that group as “the working group”, and use “we” and “our” to discuss our analysis and recommendations throughout.

We would especially like to thank the colleagues from all working group agencies who contributed their subject matter expertise and thoughtful review to this report.

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Glossary

Acronyms

ACS	American Community Survey (U.S. Census Bureau)
BIPOC	Black, Indigenous, and people of color
CDC	United States Centers for Disease Control and Prevention
DOT	United States Department of Transportation
DSEIS	Draft supplemental environmental impact statement
EJ	Environmental justice
EJI	Environmental Justice Index (CDC)
EPA	United States Environmental Protection Agency
FHWA	United States Federal Highway Administration
FTA	United States Federal Transit Administration
GHG	Greenhouse gas
HIA	Health impact assessment
I-5	Interstate 5
IBR	Interstate bridge replacement program
LPA	Locally preferred alternative
LRT	Light-rail transit
MOVES	MOtor Vehicle Emissions Simulator (EPA)
MSAT	Mobile source air toxics
NBA	No-Build Alternative
NEPA	National Environmental Policy Act
ODOT	Oregon Department of Transportation
OHA	Oregon Health Authority
PM	Particulate matter
SVI	Social Vulnerability Index (CDC)
USACE	United States Army Corps of Engineers
VMT	Vehicle miles traveled
WADOH	Washington State Department of Health
WHO	World Health Organization
WSDOT	Washington State Department of Transportation

Definitions

Our working group definitions:

This report discusses “built environment”, “cumulative health impacts”, “environmental health”, “environmental justice”, and “health equity”. The working group of agencies that conducted the health analysis agreed upon the following definitions of those terms to guide our work.

Built Environment

The CDC describes the built environment as "the physical makeup of where we live, learn, work, and play. It involves homes, schools, businesses, streets and sidewalks, open spaces, and transportation options. The built environment can influence overall community health and individual behaviors such as physical activity and healthy eating."[1] An estimated 20% of premature mortality could be prevented through changes to the built environment.[2]

Built environment features can directly affect a community's health through exposures that residents cannot avoid, such as poor air quality or heat exposure. They can also positively or negatively affect the health decisions that are available to residents, such as access to healthy food and healthcare services, which encourage physical activity and reduce stress. The World Health Organization explains how "cities can – and should – promote health through the reduction of air pollution, noise and urban heat islands, the promotion of active and healthy lifestyles, the provision of available – and affordable – healthy food, climate action, and proper housing conditions, waste management and sanitation, among others. In a nutshell, cities will be used in the way we design them."[3]

Cumulative Health Impacts

Cumulative health impacts refer to the combined effect of many factors that influence individual, community, and environmental health. Environmental factors can interact with individual and social factors, and the built environment, to make a person more susceptible to health impacts such as age, genetics, underlying or chronic health conditions, and structural racism.[4,5]

Cumulative health impacts also refer to inequities that are often layered on one another that create disproportionate harm to individuals and communities. Health disparities can be exacerbated by environmental factors, inequities exist in environmental exposures on the individual and community levels, biological and genetic factors determine and can modify impacts of environmental exposures, and social vulnerabilities "may amplify the effects of environmental hazards".[5]

Environmental Health

Environmental health "centers on the relationship between people and their environment".[6] As a public health practice, environmental health aims to prevent and reduce exposures to hazards and risks through protecting "air, water, soil and food".[6–8]

Environmental Justice

The American Public Health Association defines environmental justice as "the idea that all people and communities have the right to live and thrive in safe, healthy environments, and with equal environmental protections and meaningful involvement of these actions."[9] Washington and Oregon have both expanded on that definition to state that environmental justice also includes protection from disproportionate environmental and health impacts.[10,11] Finally, both states include equitable distributions of resources and benefits, in addition to the elimination of harm.[10,12]

To promote environmental justice, you must identify and remedy environmental injustice.

Health Equity

Health equity is the opportunity for everyone "to attain their highest level of health".[13,14] Both the Washington State Department of Health and Oregon Health Authority encourage health equity and that a person's health and well-being are "not disadvantaged by their races, ethnicity, language, disability, age, gender, gender identity, sexual orientation, social class, intersection among these communities, or other socially determined circumstances".[15] Getting to health equity requires undoing inequity and "requires attention to the root causes of health issues and a focus on the communities that are more affected".[16]

IBR Program definitions:

This report also discusses terms defined by the IBR Program, including "equity priority communities", and the "modified locally preferred alternative". The definitions of those terms by the IBR Program are below. We accessed the definition of "equity priority communities" in the IBR Program Equity Framework at https://www.interstatebridge.org/media/1ggih5ae/ibr_equity-framework-final-update-feb-2024_remediated.pdf. We accessed the definition of "modified locally preferred alternative" on the IBR Program website at https://www.interstatebridge.org/nextsteps.

Equity Priority Communities[17]

The Interstate Bridge Replacement Program Equity Framework defines "Equity Priority Communities" or "historically underserved communities" as "Communities, populations, and individuals who have been historically excluded from transportation decision-making, systematically discriminated against, and experience social, economic, and health disparities. These terms are used interchangeably in this document. It is important to note that broad terms such as these change over time, by geography, and perspective. Given That the IBR program spans two states and diverse populations, we acknowledge that there is no right answer and that these terms may evolve over the course of the program in response to local preferences and other factors.

IBR Program Equity Priority Communities include:

- BIPOC: People who identify as Black, Native American and Alaska Native, Native Hawaiian and Pacific Islander, Central and South American Indigenous, Asian, Latin American, Hispanic, and/or one or more non-white races or marginalized ethic groups.
- People living with disabilities: People who have a physical or mental impairment that substantially limits one or more major life activities, people who have a history or record of such an impairment, or a person who is perceived by others as having such an impairment.
- Tribal Governments: (Federally Recognized Tribes) are sovereign nations as recognized by the United States Government, and consultation with federally recognized tribes occurs through a government-to-government consultation process separate and distinct from public and community outreach and comment.
- Communities with Limited English Proficiency: Groups with individuals who indicate that they speak English less than "very well" on the census.
- Persons with lower income: Individuals or households with income below 200 percent of the federal poverty level.
- Individuals and families experiencing houselessness: Individuals and families lacking or in need of a house or home.

- Immigrants and refugees: Immigrants are people born outside of the United States, and refugees are people who have left their country of origin due to persecution or fear of persecution due to race, religion, nationality, political opinion, or membership in a particular social group.
- Young people: Individuals 24 years old or younger.
- Older Adults: Individuals 65 years old or older."[17]

Modified Locally Preferred Alternative[18]

According to the IBR Program website, "The Modified Locally Preferred Alternative (LPA) refers to an agreed upon set of components that will be further evaluated through the environmental review process. It is NOT the replacement bridge's final design but rather a key milestone setting the program's direction as we start to test and evaluate plans for a replacement multimodal river crossing system. Elements of the Modified LPA under analysis include:

- A new pair of Columbia River bridges built west of the existing bridge. Three bridge configuration options are under consideration: single-level fixed-span, double-deck fixed-span, and single-level movable-span.
- Improvements to the I-5 mainline and seven interchanges, north and south of the Columbia River, including options with or without C Street ramps and I-5 alignment options in downtown Vancouver, as well as related enhancements to the local street network.
- Extension of light rail from the Expo Center in Portland to Evergreen Boulevard in Vancouver, along with associated transit improvements, including transit stations at Hayden Island, Vancouver Waterfront, and near Evergreen Boulevard and options for park and ride locations in Vancouver.
- One or two auxiliary lane(s) in each direction and safety shoulders on the bridge.
- A variety of improvements for people who walk, bike and roll throughout the program area.
- Variable rate tolling for motorists using the river crossing as a demand management and financing tool.

What we learn from the review process, and corresponding environmental studies, will determine how we move forward, and necessary work to avoid, minimize or mitigate negative effects to our environment. This process will include opportunities for review and public comment and will inform the design refinements and decisions."[18]

Executive Summary

Prepared by: Washington State Department of Health, Clark County Public Health, Cowlitz Indian Tribe Health and Human Services, Oregon Health Authority, Multnomah County Health Department

Interstate Bridge Replacement Program Overview & Public Comment Information

The Interstate Bridge Replacement (IBR) Program will be one of the largest infrastructure projects in the region for a generation. Because of this scale, it provides tremendous opportunity to positively impact health and advance environmental justice and equity.

The project underwent an evaluation through the National Environmental Policy Act (NEPA) to assess potential impacts. From September 20 to November 18, 2024, the IBR Program held a public comment period on its Draft Supplemental Environmental Impact Statement (DSEIS), a series of draft documents that cover topics studied under the environmental review.

Health Analysis Overview

As part of the planning and implementation of the IBR Program, regional partners requested that a health impact assessment (HIA) be included to understand the project's effects on community health and well-being. State and local health departments in Oregon and Washington, joined by a representative from Cowlitz Indian Tribe Health and Human Services, began meeting in early 2024 to collaborate to complete this request. Time constraints limited the scope of the HIA, and a modified health analysis relying on literature review, existing data, and public health best practices was drafted. The health agencies reviewed readily available information and select DSEIS technical reports to examine the potential health effects of the Modified Locally Preferred Alternative (LPA) – including environmental justice and health equity concerns. The health analysis assesses potential health impacts of the Modified LPA and does not propose an alternative.

The Health Analysis was submitted as a public comment to the IBR Program before the end of the public comment period in November 2024. This summary highlights key takeaways for each topic area and an overview of the project recommendations that were submitted to the IBR Program. The *Recommendations* section of the Health Analysis includes additional detail and implementation suggestions.

For more information about the health analysis, contact EHAssessment@doh.wa.gov.

Topic Areas

The Health Analysis identifies six topic areas of public health interest related to the program. Each topic area is represented by an icon. An icon or multiple icons accompany each of our recommendations to indicate which topic area and associate health outcomes could be improved by implementation of the recommendation:

- Air quality
- Climate change and health
- Transportation & active transportation
- Social determinants of health
- Noise
- Water quality

Key Takeaways

To reduce negative health impacts of the IBR Program, we recommend decision-makers design, construct, and maintain a program that prioritizes human health and safety, ecological health, and environmental justice. There are a number of places throughout the DSEIS where there is insufficient information to determine health impacts. There are also many decisions to be made for the final SEIS, design decisions, and local decisions that could change the assessment of the project having either a positive, negative, or neutral impact to health. We encourage keeping public health partners, community, and Tribal representation at the table in decision-making for the Program.

There is **sufficient evidence** in the DSEIS for the following potential health impacts of the Modified LPA:

- **Potential protective elements and positive health impacts**
    - **Transportation and active transportation:** The extension of light rail services and addition of enhanced pedestrian and bike facilities will likely increase physical activity and improve health. Expanding design and policy decisions that encourage people to walk, roll, bike, or use transit, rather than drive, would increase health benefits.
    - **Access**: Bringing the bridge, and auxiliary connections, up to or exceeding standards under the Americans with Disabilities Act (ADA) would improve access for all. Using inclusive or universal design, which centers around older adults, people with disabilities, and children, would increase benefits.
    - **Heat**: Providing shade and cooling for bridge users, especially active transportation users, could provide protection from heat-related health outcomes.
    - **Employment:** The project would drive a temporary increase in construction-related employment. Increased access to light rail and transit services could increase access to jobs and other essential services. Increasing contracting for Disadvantaged Business Enterprises, Minority Business Enterprises, Women Business Enterprises, and Small Business Enterprises would increase equitable distribution of these benefits.
    - **Access**: The Modified LPA includes plans to expand connections between active transportation networks, trails, and parks. Increased access to greenspace would have a positive impact on health.
    - **Water quality**: Improvements to stormwater infrastructure would have positive health impacts on water quality, and the health of the ecosystem.
    - **Safety:** Replacement of the existing I-5 bridge will result in a structure with greater seismic resilience, minimize the risk of a bridge collapse during an earthquake, and support safety, regional travel, and access to essential services.

- **Potential harmful elements and negative health impacts**
    - **Air quality:** Given the existing high traffic volumes along the I-5 interstate bridge, people who live nearby are subjected to greater concentrations of air toxics and are at risk of experiencing additional air quality burdens. The DSEIS estimates a 33% increase in VMT under the Modified LPA by 2045 and increase in freight traffic volumes, which could increase particulate matter and negatively impact air quality.
    - **Transportation and active transportation:** Transit access to jobs for BIPOC residents, immigrants and refugees, and people under the age of 25 did not increase as much as it did for white, non-Hispanic residents. This indicates disparities would continue to remain, likely reinforcing disparities in opportunities for physical activity.
    - **Tolling**: Tolling would have a disproportionate impact on low-income community members and could negatively impact access to essential services like health care and culturally specific health care.

- **Access**: The IBR Program could negatively impact access to traditional cultural activities, culturally specific health care, and access to ancestral lands for American Indian and Alaska Native communities.
- **Access:** Construction delays on roads, delays to bus routes and light rail service, and closures of sidewalks and active transportation paths may negatively impact access to homes, jobs, schools, health care facilities, and other essential destinations. These impacts may be greater for those that do not have car access.
- **Noise**: The Modified LPA would approach or exceed noise abatement criteria at 65 locations in Portland and 135 locations in Vancouver, including Discovery Middle School. Children and their learning comprehension are particularly affected by noise. The DSEIS describes higher levels of noise and vibration will negatively and disproportionately impact communities identified as equity priority communities.
- **Displacement**: The IBR Program will acquire land displacing 43 homes and could also displace houseless residents in the project area. Between 32-35 businesses and 600-742 employees could be impacted due to property acquisitions. Equity priority communities of East Columbia, Rockwood, Esther Short, and Rose Village would be disproportionately impacted.

There is **insufficient evidence** for several topic areas to determine potential health impacts of the Modified LPA.

- **Climate change and health:** The DSEIS anticipates the Modified LPA will reduce greenhouse gas emissions (GHG) compared to the No-Build Alternative. Construction of the Modified LPA will produce GHG emissions. Several climate-related hazards are projected to impact the region throughout the construction and operation of the Interstate Bridge, including heat, wildfire smoke, severe weather and flooding. The health effects of climate change are not equally distributed, and several communities are disproportionately affected by climate change - including IBR Equity Priority communities. More information is needed about how the Program will mitigate climate change impacts to Equity Priority Communities and what protective elements for health and climate justice will be included in final design and construction plans.
- **Air quality:** Due to the large geographic area used to conduct the air quality analysis, and the statement in the DSEIS that localized health impacts due to air quality cannot be reliably quantified, more information is needed to reliably assess air quality impacts. This is the basis of our recommendation for air quality monitoring and further air quality assessment, including dispersion modeling. Air dispersion modeling incorporates data appropriate for analyzing potential health impacts on a local scale.
- **Road safety:** The DSEIS states that crashes will increase by 15% under the Modified LPA, mainly due to estimated increases in traffic volumes. The DSEIS does not provide clear information about how crash frequency would change by travel mode, crash type, severity, location, or for environmental justice communities. There is insufficient evidence in the DSEIS to conclude to what degree severe injury and fatalities would be reduced for active transportation users.
- **Fugitive dust**: There is insufficient information about mitigation plans for fugitive dust during construction and how that could impact air quality and water quality.
- **Water quality**: There is insufficient information in the DSEIS regarding a plan to sample and analyze hazardous sediments and toxic contamination prior to in-water work.

Topic Areas Summary

Air quality + health concerns + potential project impacts

- Transportation is a significant contributor to air pollution-related illness and premature death. Emissions from vehicles, including carbon monoxide, nitrogen oxides, and particulate matter, can lead to respiratory, cardiovascular, neurodegenerative, and metabolic diseases, as well as cancer and reproductive issues.
- The DSEIS projects that the Modified LPA would result in a 33% increase in vehicle miles traveled (VMT) by 2045 compared to the 2015 baseline. Despite the expected increases in VMT, the DSEIS predicts that vehicular emissions will decrease compared to the 2015 baseline. The DSEIS estimates this using modeling from EPA's MOVES model, which assumes that emissions will decrease due to the 2007 EPA Control of Hazardous Air Pollutants from Mobile Sources. This modeling was run on a geographic scale (including Clark, Multnomah, Clackamas, and Washington counties) that is too large to understand local health and environmental impacts in the project area.
- The DSEIS states that concentration of air toxics from mobile sources would likely be more pronounced on road segments where traffic would increase under the Modified LPA compared to the No-Build Alternative due to diversion to avoid tolls. However, many of these road segments were not included in the air quality analysis.
- Modified LPA policy decisions which minimize mobile sources of air toxics during the operation of the project and design elements which mitigate the coinciding health impacts, like green infrastructure and indoor air filtration, would reduce potential public health burdens.

Transportation and active transportation + health concerns + potential project impacts

- Physical activity improves a wide range of health outcomes across the lifespan. Transportation planning and design features influence the opportunities available to community members to be physically active by walking, biking, or using transit.
- Project construction may create travel barriers or delays to essential destinations, regardless of mode.
- The extension of the light rail line and addition of enhanced walking and bike facilities will likely increase physical activity and support improved community health.
- Traffic volumes are projected to increase under the Modified LPA. Design and policy options that encourage more people to walk, bike, or use transit, rather than drive, would yield additional health benefits through increased physical activity.
- The DSEIS projects that the Modified LPA will result in a 15% increase in crashes on the freeway network and negligible change in crash frequency on the local road network. No information is provided on projected changes in crash type or severity.
- Tolls have the potential to further encourage mode shift to transit. This could improve health outcomes related to physical activity and air quality. However, tolls could also have a disproportionate impact on low-income community members.

Noise + health concerns + potential project impacts

- Harmful traffic noise levels can contribute to chronic and cardiovascular disease, disturb sleep, and reduce cognitive functioning. Older adults, shift workers, and people with preexisting sleep disorders are more sensitive to noise-induced sleep disturbance, and children are particularly sensitive to noise-induced health effects and learning disruptions.
- The Modified LPA would approach or exceed noise abatement criteria at 65 locations in Portland and 135 locations in Vancouver, including residences, offices, and one school. Noise walls are the only proposed noise mitigation for the project.
- Noise monitoring during construction, and re-examination of noise mitigation would yield greater protection from harmful noise exposure for community members in the project area.

Climate change and health + health concerns + potential project impacts

- Climate change is associated with many adverse health outcomes, including but not limited to heat-related illness, respiratory illness, cardiovascular failure, adverse perinatal outcomes, mental health impacts, injury, and death. The health impacts of climate change are not equal, and several populations are disproportionately affected.
- The DSEIS *Climate Change Technical Report* projects several climate change scenarios with impacts in the region over the project period, including higher temperatures and more extremely hot days, more fires and severe smoke, changes in precipitation, and increased risks of flooding.
- Workers, pedestrians, bicyclists, transit users, and adjacent communities may be exposed to heat, wildfire smoke or poor air quality, and other severe weather events during bridge construction and operation.
- Modified LPA design and construction operations that prioritize reducing the urban heat island effect, increasing shade and respite from heat, mitigating flooding risks, and planning for heat, wildfire smoke, and other severe weather and climate (flooding, extreme precipitation) events could improve resiliency and yield more protection from climate change-related illness and injury in the project area.
- The DSEIS *Climate Change Technical Report* anticipates the Modified LPA would result in a reduction of greenhouse gas emissions compared to the No-Build Alternative.

Social determinants of health + health concerns + potential project impacts

- The construction and operation of the Interstate bridge replacement will influence other factors that affect health, including housing, income, employment, and access to greenspace and health care.
- The IBR Program could negatively impact access to traditional cultural activities, culturally specific health care, and access to ancestral lands for American Indian and Alaska Native communities.
- The Modified LPA requires the acquisition of land that would displace 43 homes. Construction could also displace houseless community members residing in the project area.
- The Modified LPA will have varied economic impacts. Between 32-35 businesses and 600-742 employees are projected to be impacted due to property acquisitions required for construction. The project will also drive a temporary increase in construction-related employment while the bridge is being built.
- The IBR Program will comply with the Uniform Relocation Assistance and Real Property Acquisition Policies Act to provide relocation assistance to displaced residents and businesses. Additional supports to lessen the emotional impact of displacement for all, like investments to support homeless individual relocation, workers affected by business displacement, and the return of displaced individuals or businesses, could support greater health and well-being.

Water quality + health concerns + potential project impacts

- Safe and clean water is essential for the health of humans, animals and the entire ecosystem. Impacts to the health of the Columbia River and surrounding waterways, including the Troutdale Aquifer, could not be more consequential.
- Construction, specifically in-water construction, will have impacts on turbidity of the water, and can disturb hazardous sediments and toxic contamination. There are already waterways in the project area with pollutants that have required monitoring.
- Fugitive dust from construction and demolition can settle into the water and impact water quality. Climate change and drought can increase concentrations of contaminants in water.
- The IBR Program will implement stormwater infrastructure which will help improve water quality. Continuing to adapt to emerging issues such as 6PPD contamination, which is lethal for salmon, could positively impact water quality and ecosystem health.
- The DSEIS *Water Quality Technical Report* and the DSEIS *Hazardous Materials Technical Report* discuss the need to sample and analyze the levels of hazardous sediments and toxic contamination, but no plan to conduct sampling or report on the results prior to in-water work.

Recommendations

Prioritize sustainability, transparency, communication and health for the lifetime of the project

1. Institute accessible systems for real-time two-way communication about project design and construction impacts to keep community members informed of project impacts, and the program informed of community impacts.
2. Prioritize health in program policies and decision-making throughout the lifetime of the program by incorporating regular engagement with community members, health department staff, and Tribal governments.

Provide additional information and modeling to better understand potential health impacts

3. Compile and release to the public more information about demolition plans for the current bridge infrastructure, including potential air quality, noise, and water quality impacts.
4. Expand information about potential air quality, safety, and connectivity impacts of design and construction.
5. Compile and release to the public additional information about potential air quality, safety, and connectivity impacts of tolling-related traffic diversion through neighborhoods.
6. Develop and release to the public a detailed sampling and analysis plan of riverbed sediment including potential contaminants, hazardous sediments, and toxics.

Design with health and equity in mind

7. Design active transportation (bike lanes, sidewalks, and multi-use trails) and public transportation that is accessible to all to improve air quality and physical activity.
8. Design safety features to reduce injury for active transportation users and vehicle users.
9. Improve greenspace and tree canopy cover to improve air and water quality, provide shade, and increase natural spaces.
10. Design with sustainable materials and standards to reduce greenhouse gas emissions.
11. Prioritize resilience to extreme weather events, climate change, and seismic events to improve safety.
12. Maintain and improve good air and water quality in the project area to protect physical and mental health.
13. Minimize noise in the project area to protect nearby neighbors and populations disproportionately affected by noise.
14. Improve connectivity and community cohesion to promote access to community and essential services.
15. Center equity and focus on local businesses in contracting to improve economic opportunities for underrepresented groups.
16. Minimize home and business loss, and proactively support displaced residents, businesses, and employees.

Construct with health and equity in mind

17. Meet and exceed, where possible, state and local requirements for noise, air quality, and water quality to protect the health of workers, community members, and the ecosystem.
18. Design and mark routes during construction to protect pedestrians and active transportation users from injury and environmental exposures.
19. Maintain community connectivity through reliable access to transit, neighborhood services, and regular transportation routes.
20. Protect workers and community members on high-risk days for high heat and poor air quality events.
21. Establish systems for continuous monitoring for noise and air quality during and after program construction, ensuring that pre-construction conditions are measured as a baseline.
22. Implement workforce development and support programs to develop and retain a diverse workforce.

Introduction

The Interstate Bridge Replacement Program is going to be one of the largest infrastructure projects in the region for a generation. The opportunity to create a piece of infrastructure that connects two thriving communities, that has the opportunity to positively influence health, and to center environmental justice and equity cannot be overstated.

Health Impact Assessments

Health impact assessments (HIA) have been used around the world to help decision makers better understand impacts of proposed project, policies, and plans in a multidisciplinary process. They can help draw connections and demonstrate how "non-health sectors' activities play a major role in determining health outcomes."[19] Historically, they have focused on "ensuring threats to human health are considered as part of regulatory [processes]" but have since expanded to include additional information about environmental health, health equity, and social determinants of health.[19] Many have pointed to health impact assessments to fill the gap in federal processes such as the National Environmental Protection Act (NEPA) that do not explicitly require the assessment of human health impacts of proposed projects.[20] "Those concerned with health equity have [identified] HIA as an intervention that can address health inequities in policy development and planning, that is, before inequalities come about."[19]

Health impact assessments comprise a systematic, yet flexible, process that follows a standard six steps of screening, scoping, assessment, recommendations, reporting, and monitoring & evaluation. It also involves robust community engagement at every step of the process. Community engagement and feedback from partners "has consistently been described as a core element of HIA practice and should be considered essential to it."[21(p46)]

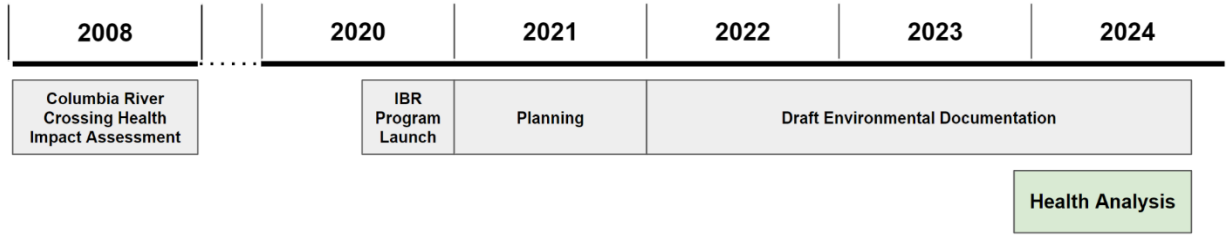
Introduction to Interstate Bridge Replacement Program & Health Analysis

When the state and local government partners sponsoring the Interstate Bridge Replacement (IBR) Program identified a Modified Locally Preferred Alternative (LPA) to replace the Interstate 5 bridge between Oregon and Washington states, several partners requested a Health Impact Assessment (HIA). An HIA had previously been conducted in 2008 during the Columbia River Crossing program.[22] (Accessible at https://www.pewtrusts.org/~/media/Assets/2008/06/HIAReport15ColumbiaRiverCrossing.pdf.)

In late 2023 the IBR Program contacted public health authorities to request that they prepare an HIA. The Washington State Department of Health, which houses an HIA program, agreed to convene the Oregon Health Authority, Clark County Public Health, and Multnomah County Health Department to develop a feasible approach to assessing bridge replacement's health impacts.

These health agencies formed a health analysis working group and began meeting in January 2024 (Figure 1). This report will refer to that group as "the working group", and use "we" and "our" to discuss our analysis and recommendations throughout.

Figure 1. High-level IBR Program and health analysis timeline



Using guidelines from the Society of Practitioners of Health Impact Assessments (SOPHIA), the working group concluded that timeline constraints did not allow for preparation of a comprehensive HIA. Health Impact Assessments require considerable time, resources, and include full community engagement at each step of the process. We estimate that an HIA would take at least two years to complete for a project of this magnitude. However, recognizing the potentially significant environmental and health impacts this project will have, the health agencies decided to prepare a Health Analysis of the IBR Program.

The Health Analysis is based heavily on standards and processes for an HIA, incorporating publicly available information and previous studies already underway for the IBR Program. Table 1 displays our adapted health analysis approach compared to a comprehensive HIA. Washington Department of Health and Oregon Health Authority followed their respective state policies and offered formal consultation to federally recognized Native American Tribes for the Health Analysis independent of IBR Program Tribal consultation. The Cowlitz Indian Tribe Health and Human Services joined as a member of the working group in April 2024. The working group completed the health analysis independently from the IBR program and we are submitting this report as a public comment on the Draft Supplement Environmental Impact Statement.

Table 1. Comparison of traditional health impact assessment and health analysis of IBR Program

Health Impact Assessment Step	Comprehensive Health Impact Assessment	Adapted Health Analysis Approach used to assess IBR Program Modified LPA
Screening	Determining feasibility and value-add of assessment for decision-making process.	The assessment was requested by the IBR Program and local partners.
Scoping	Create a work plan, key impacts to study, and determine methods for engagement and assessment.	• Health impacts identified through literature review • Community engagement not feasible within timeline
Assessment	Establish existing conditions for a baseline profile and evaluate the magnitude and direction of potential impacts.	• Emphasis on effects of Modified LPA versus no build alternative • Impacts evaluated using NEPA technical documents, systematic reviews, and existing data
Recommendations	Develop recommendations to improve health and mitigate harm.	Informed by assessment findings and priorities previously identified by project advisory groups
Reporting	Communicate results.	Posted an executive summary 10/15 on Washington DOH website. Submitting a full health analysis report to IBR Program as public comment.
Monitoring and Evaluation	Track how the assessment influences the decision-making process, if information is used, and if health outcomes improve.	Recommendations include continued integration of public health staff into ongoing IBR Program operations to support implementation and monitoring.

The goals of the Health Analysis are to:

- Identify health impacts of the IBR Program as detailed by the DSEIS.
- Provide and support adoption of evidence-based recommendations to support positive health impacts, reduce health disparities, and mitigate harm
- Leverage existing community engagement and advisory opportunities for Clark County, Multnomah County and the IBR program to incorporate community voice in decision-making
- Incorporate local health data into ongoing efforts to map and address equity and climate priorities for the IBR program.
- Engage public health and tribal partners for future decision-making phases of the IBR program

Health Analysis Methods

The working group completed the health analysis in three phases: scoping, assessment, and recommendations, detailed below. Additional details about our methods, including data sources, are available in Appendix A.

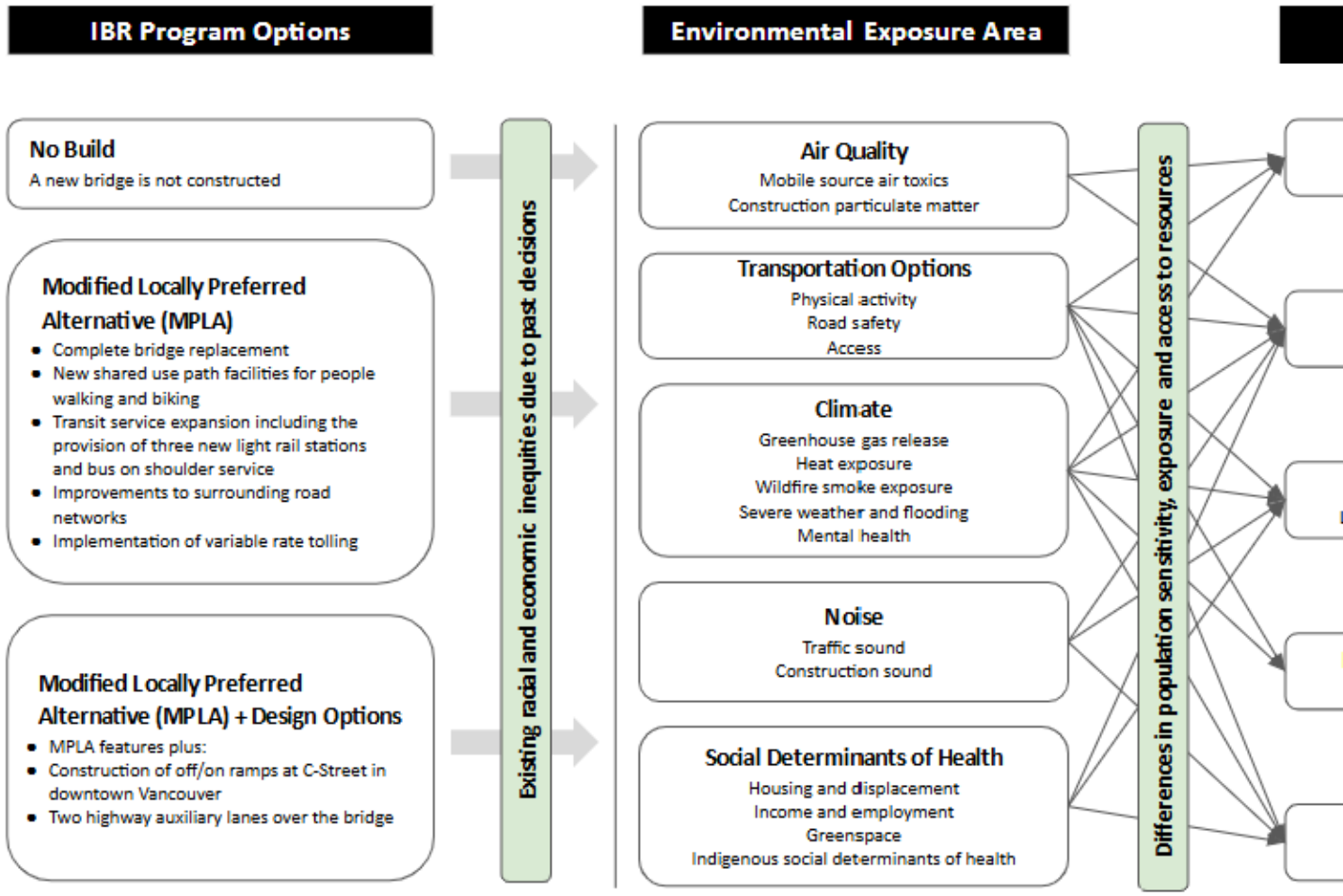
Scoping

The working group selected priority topic areas for assessment per SOPHIA guidelines for scoping. The topics include **air quality, transportation and active transportation, climate change and health, noise, social determinants of health, and water quality**.

As public health professionals, it is our mission to protect and enhance the health of the people in our states and counties. This health analysis assesses potential health impacts of the Modified LPA and does not propose an alternative.

Figure 2 outlines a health pathway diagram that links IBR program elements, focus exposure areas within the health analysis, and related health outcomes. The diagram emphasizes the role of past decisions in creating present health inequities, and how differences in population sensitivity and access to resources similarly influences prevalence of diseases and injury amongst different groups.

Figure 2. IBR Program Health Analysis Health Pathway Diagram



Assessment

The working group reviewed readily available information to examine the potential health effects of the Modified LPA – including environmental justice and health equity concerns. The following sources informed potential outcomes in each topic area:

- **Literature review.** The working group established a baseline of knowledge on each topic area from a scan of peer-reviewed literature, relying on systematic reviews and meta-analysis as a benchmark for strong evidence.
- **Readily available public data.** The working group used primarily the CDC Environmental Justice Index, CDC PLACES, CDC Social Vulnerability Index, and Census data to contextualize local health and environmental justice conditions. The working group chose these data sources based on the following factors: a) widely used and best available evidence-base from authoritative bodies that incorporate validation and rigorous review in publication, b) publicly available and readily accessible, c) comparable across Oregon and Washington, d) include data indicators that are commonly used in health analysis topic areas, and e) when possible, are place-specific and include data by census tract.
- **Draft DSEIS technical reports.** The working group reviewed select draft technical reports from the DSEIS prepared in February 2024 and cross-checked details with the DSEIS published in September 2024.
- **IBR Program Advisory Group Presentations.** Throughout the assessment stage, the working group attended the IBR Equity Advisory Group, Community Benefits Advisory Group, and Community Advisory Group meetings in July and August 2024 to present an overview of the health analysis. This provided an opportunity for the working group to ground the scope of the health analysis topic areas and for IBR advisory group members to highlight health priorities. The working group also presented an overview of the health analysis to the IBR Program Manager Group in May 2024.
- **IBR Program Site Visit.** The working group attended a half-day site tour with IBR program staff in July 2024 to visit key locations in Clark and Multnomah counties that would be affected by the Modified LPA and discuss potential effects.
- **Documentation from IBR Program Advisory Groups.** The health analysis honors the previous work that community members have contributed to the project, and uplifts recommendations documented in notes from previous meetings.

The DSEIS analysis considers IBR effects in three scenarios: 1) No-Build Alternative (no new bridge constructed) 2) Construction Modified LPA, and 3) Construction of the Modified LPA with design options incorporated that include C-Street ramps and two auxiliary lanes across the bridge (Table 2). The health analysis considers health effects from implementation between these three scenarios as data allows.

Table 2. Interstate Bridge Replacement Program implementation options

No-Build Alternative	Modified LPA	Modified LPA Design Options
No new bridge constructed	● Complete bridge replacement ● New shared use path facilities for people walking and biking ● Transit service expansion including the provision of three new light rail stations and bus on shoulder service ● Improvements to surrounding road networks ● Implementation of variable rate tolling	● Modified LPA elements plus: ● Construction of off/on ramps at C-Street in downtown Vancouver ● Two highway auxiliary lanes over the bridge

Recommendations

The assessment informed evidence-based recommendations for the IBR Program and state and local agencies sponsoring the bridge replacement to take into consideration in constructing the new bridge and associated interchange replacements. This health analysis assesses potential health impacts of the Modified LPA and does not propose an alternative.

To reduce negative health impacts and maximize health benefits of the IBR Program, we recommend decision makers design, construct, and maintain a program that prioritizes human health and safety, ecological health, and environmental justice.

Limitations

The most important limitation to note is that this version of the analysis is based on information available to local health agencies as of August 2024, primarily from the DSEIS. In many cases, the DSEIS does not include sufficient information to determine the magnitude, severity, or distribution of potential health impacts. For some pathways, a slight error in foundational assumptions about the project or quantitative models could reverse the *direction* of impacts (i.e., a health harm versus a health benefit).

The working group completed this health analysis on an accelerated timeline, making our best effort to assess potential health and health equity impacts of the IBR program in the time available (February – September 2024, with the first requested deadline of May 2024). We reviewed select technical reports to identify potential environmental health and health equity concerns and develop evidence-based recommendations for the Program.

The working group consulted subject matter experts from across our agencies to develop this report, but given the timeline, the working group had limited opportunity for extensive review. We welcome feedback and external review.

Further, we were unable to engage community fully in this process. While we received thoughtful feedback from community members and local representatives from the IBR Advisory Groups, we did not involve community at each step of the health analysis process, as is best practice for HIA. Our recommendations reflect a need for continued and enhanced community engagement by the IBR Program.

Our assessment of health topics and potential project impacts is based on literature review, readily available existing data, and review of draft DSEIS technical reports. We were unable to model potential health impacts. Our recommendations reflect a need for detailed modeling to better understand how air quality, transportation, and noise impacts by the IBR Program may affect communities.

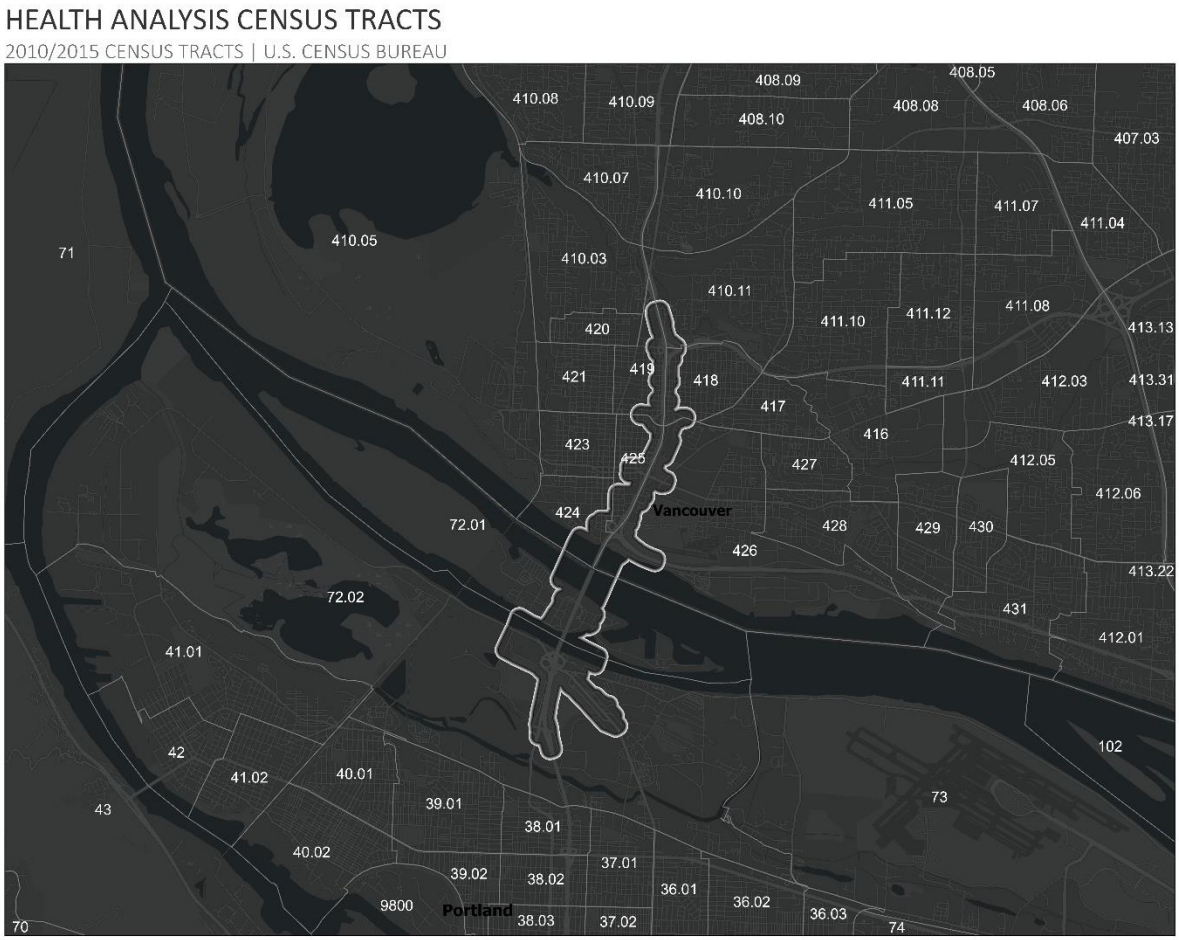
Some readily available existing data sources used in this assessment were only available by region, county, or census tract. Therefore, we were unable to draw more specific conclusions for some topics about communities most impacted and potential health impacts on a more granular scale (e.g., block or block group level).

Project Area Context

Geography

In this analysis, the IBR Project Area was defined as census tracts that overlap with the IBR Project boundaries, which include census tracts 410.11, 418, 419, 424, 425, and 426 in Washington, and 72.01 and 72.02 in Oregon (Figure 3, 2010/2015 Census). When census tract-level data was available, we summarized/averaged estimates for these 8 census tracts in the IBR Project Area to compare to Clark and Multnomah counties overall. Some data utilized the 2020 Census and is denoted in this report. Data available at the county-level only is also included.

Figure 3. Census tracts included in the project area and health analysis



Demographics and Social Factors

Tables 3 and 4 include demographic and socioeconomic data for the IBR Study Area, compared with Clark and Multnomah counties.

Table 3. Demographics in IBR Study Area, Clark County, and Multnomah County. Source: CDC EJI[23]

Indicator	IBR Study Area	Clark County	Multnomah County
Population	26,611	504,091	808,098
Percent CoC	26%	22%	29%
Percent <17	14%	24%	18%
Percent 65+	18%	15%	13%
Percent w disability	20%	13%	12%
Percent with limited English proficiency (LEP)	1.4%	2.6%	4.1%

Table 4. Socioeconomic factors in IBR Study Area, Clark County, and Multnomah County. Source: CDC EJI[23]

Indicator	IBR Study Area	Clark County	Multnomah County
Percent below 200% poverty	33%	25%	28%
Percent households that make less than 75K	34%	28%	33%
Percent who are uninsured	7.4%	5.9%	6.5%
Percent unemployment	5.3%	4.8%	4.8%

Health Outcomes

Table 5 includes select health topics and outcomes related to health analysis topic areas, and compares these estimates in the IBR Study Area to Clark and Multnomah counties overall.

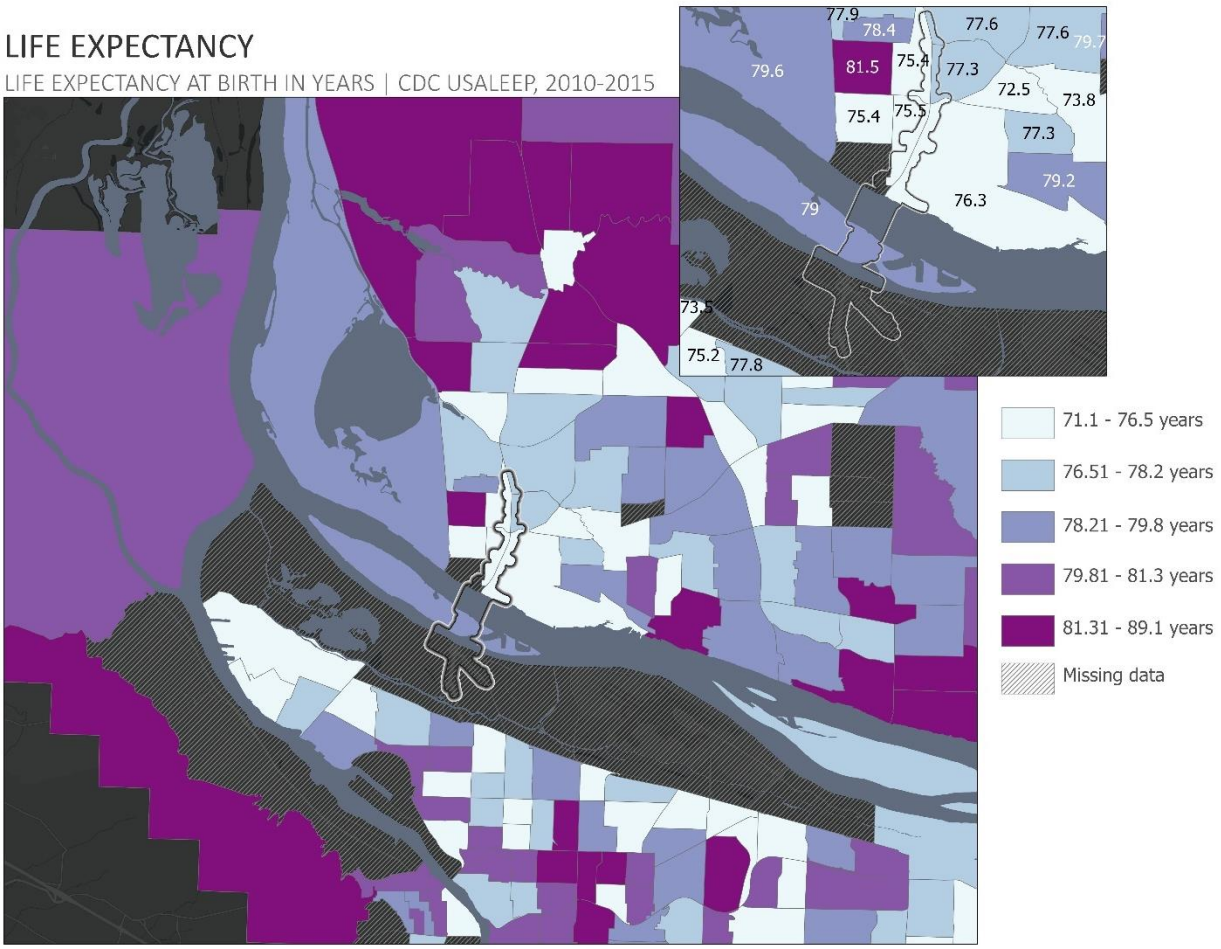
Table 5. Health Indicators[*] Related to Health Analysis Topic Areas in IBR Study Area, Clark County, and Multnomah County. Sources: CDC EJI[+23], CDC PLACES[^24]

Indicator	IBR Study Area Average Crude Prevalence (%)	Clark County Average Crude Prevalence (%)	Multnomah County Average Crude Prevalence (%)
Physical Inactivity[^]	18.7%	17.2%	17.1%
Asthma[+]	10%	10%	11%
High Blood Pressure[+]	30%	29%	26%
Cancer[+]	6.9%	6.7%	6.1%
Reported Poor Mental Health[+]	14%	13%	14%
Diabetes[+]	9.8%	8.8%	8.4%

*Estimates are crude – meaning they do not account for age

Life expectancy at birth is an indicator of mortality widely used in public health. Figure 4 displays life expectancy at birth estimates from 2010-2015 by census tract surrounding the IBR project area.[25] Life expectancy data for census tracts 424 and 72.02 are missing from this dataset. Figure 4 shows life expectancy in census tracts that overlap with the IBR project area are in the middle-to-lower ranges among life expectancy in Clark and Multnomah counties. Census tract 72.01 has the highest life expectancy in the IBR project area, at 79 years, while census tracts 419 and 425 are within the lower range around 75 years.

Figure 4. Life Expectancy at Birth (years) around IBR Project Area



Environmental Justice Context

Redlining, the discriminatory practice of lending based on a neighborhood desirability score largely dependent on race and income, was used in Portland in the 1930s.[26,27] There is evidence that banks continued with this practice through the 1990s, and redlining reinforced disparities in intergenerational wealth in Multnomah County.[28] Parts of the Kenton neighborhood, in the southern part of the IBR Program study area, were classified as “definitely declining” on maps created by the Home Owners Loan Corporation in the 1930s.[28] A similar map was not created for Vancouver, though the Racial Restrictive Covenants Project identified several properties that had racial restrictions in neighborhoods in the project area: West Minnehaha, Lincoln, Rose Village, and Central Park.[29] There is a significant association with the neighborhood desirability score (A [best] - D [hazardous]) and pedestrian fatalities, the result of decades of underinvestment in infrastructure.[30]

Those racist housing practices contributed to Portland's Black community primarily residing in the Albina neighborhood.[31] Vanport, developed as a temporary neighborhood to house shipyard workers and families, was also one of Portland's most diverse neighborhoods. Both Albina and Vanport serve as examples of built environment decision making disproportionately harming communities of color and low-income communities. The Columbia River flooded Vanport in 1948, displacing more than 18,000 residents, a third of whom were Black. Many relocated to Albina in the absence of other options in a heavily segregated Portland. The construction of I-5 and the Memorial Coliseum in the 1950s through '70s displaced hundreds of Abina families and bisected the neighborhood, cutting off connections from East to West.[31,32]

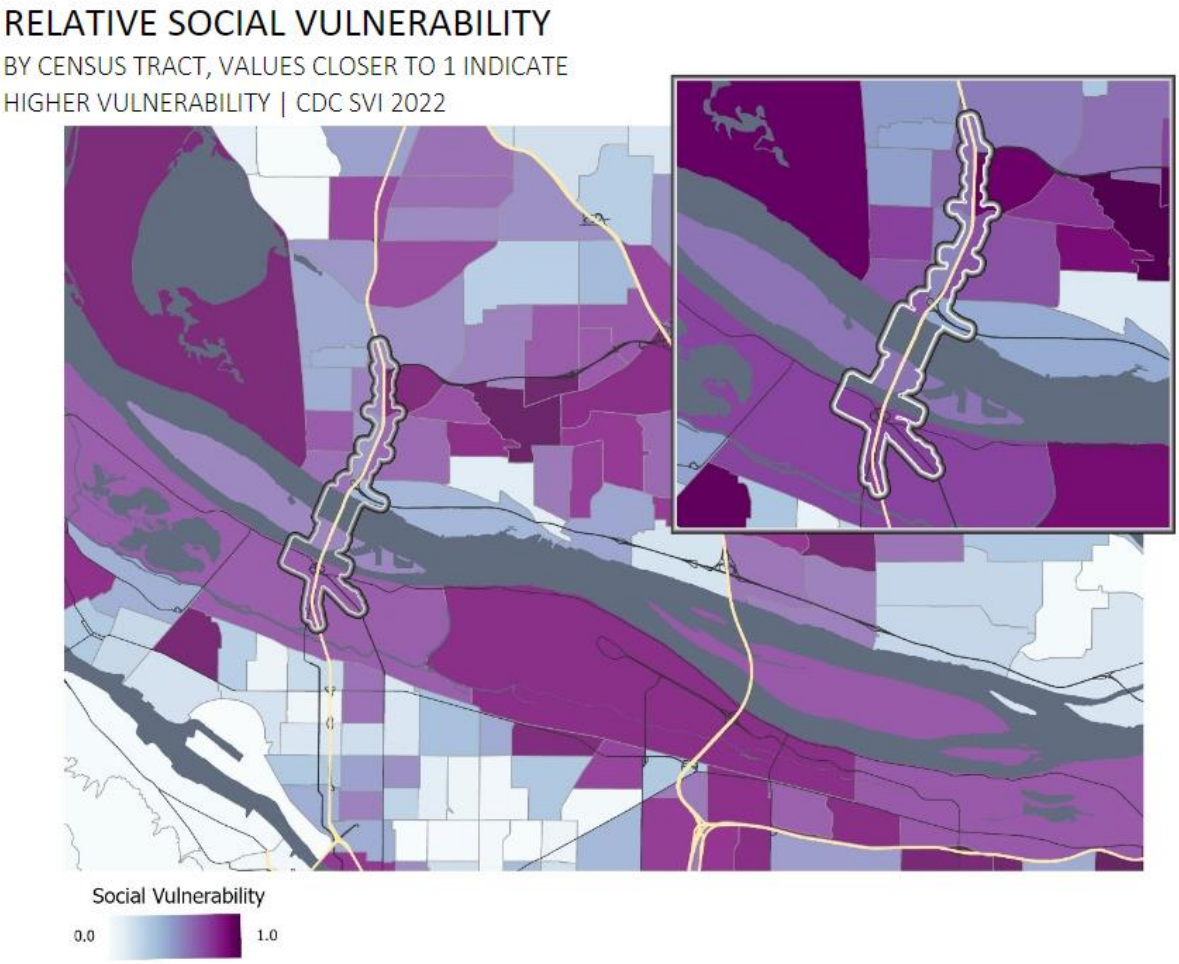
While Albina is outside of the IBR Program area, lessons from these harmful built environment decisions of the past remain relevant and valuable to decisions that will shape this once-in-a-generation project. The IBR Program has the potential to either further harm or mitigate additional harm by equitably distributing benefits to residents across the program area.

CDC's Social Vulnerability Index (SVI)(Figure 5) "indicates the relative vulnerability of every U.S. census tract".[33] This metric accounts for 16 different demographic factors, including poverty status, educational attainment, and racial and ethnic minority status. This index includes factors similar to those considered in the IBR Program's definition of "equity priority communities," though it does contain more information on housing-related indicators. The full list of variables includes socioeconomic status (below 150% poverty, unemployed, housing cost burden, no high school diploma, no health insurance), household characteristics (aged 65 and older, aged 17 and younger, civilian with a disability, single-parent households, English Language Proficiency), racial and ethnic minority status, and housing type and transportation (multi-unit structures, mobile homes, crowding, no vehicle, group quarters).

A note on language

In census and other federal or state data, racial and ethnic demographic data often are reported in lumped groups, using terms like "minority populations." Even the acronym "BIPOC" reflects a grouping of multiple different racial and ethnic identities that are unique. Use of the phrase "minority populations" throughout this report is reflective of language in our source material, including DSEIS documents and census data.

Figure 5: Relative social vulnerability in program area based on CDC Social Vulnerability Index. Source: CDC SVI 2022[33]



Notably, all but one of the census tracts that fall within IBR's defined project area are contained in the most vulnerable half of census tracts in their respective states. Census tract 418, containing the Rose Village neighborhood of Vancouver, is the census tract with the highest overall relative vulnerability anywhere in the project area.

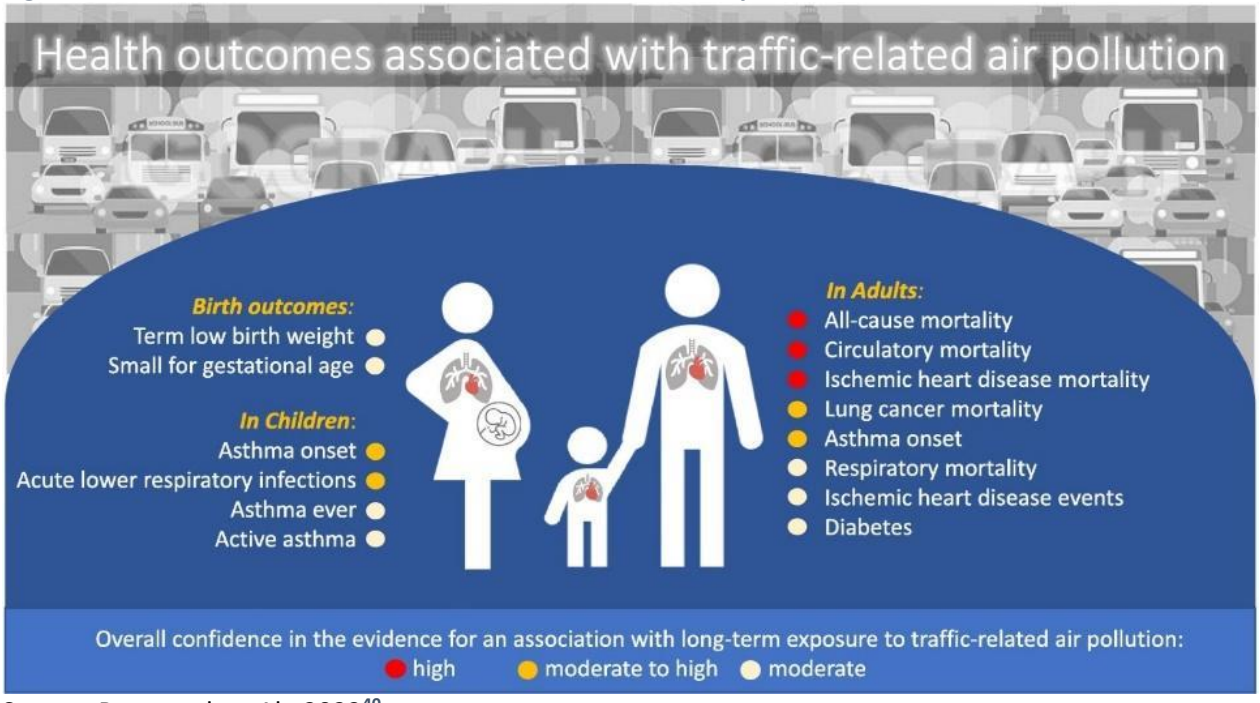
Assessment

Air Quality

Literature Review

Transportation is a significant contributor to air pollution-related illness and premature death. Emissions from vehicles include carbon monoxide, nitrogen oxides, and particulate matter. Exposure to traffic-related air pollution can lead to respiratory, cardiovascular, neurodegenerative, and metabolic diseases, as well as cancer and reproductive issues.[34–36] On-road diesel vehicles are a major source of these pollutants and have been shown to have the largest contribution to the health burdens of traffic-related $PM_{2.5}$ and ozone pollution.[37] The health impacts of carbonaceous traffic-related air pollutants, such as particulate matter (e.g., PM 2.5) and volatile organic compounds, are a particular concern in urban areas.[38] Road traffic pollutants like nitrogen dioxide, carbon monoxide, and elemental carbons can also have detrimental effects on human health and the environment.[39,40]

Figure 6. Health outcomes associated with traffic-related air pollution



Source: Boogaard et. Al., 2022[40]

Exposure to traffic-related air pollution has negative health impacts on children, adults, and pregnant people.[40] Higher rates of asthma exacerbation and onset in both children and adults are associated with exposure to traffic-related air pollution. [40] The CDC estimates that asthma costs the United States roughly $80 billion a year due to medical costs, days missed from school and work, and deaths.[41] These pollutants also increase risk of all-cause mortality, circulatory mortality, lung cancer mortality, and ischemic heart disease mortality.[40] Additionally, poor air quality is associated with respiratory issues, heart attacks, absences from work and school, lung cancer, and declines in cognitive development for children.[42,43]

The use of electric and hybrid fuel vehicles and transportation demand policies can help mitigate health concerns associated with traffic-related air pollution in areas where they are used.[44,45] However, TRAP reductions associated with electric and hybrid fuel vehicles may not be distributed evenly, as research suggests that relative reductions in TRAPs are lower for disadvantaged communities than in non-disadvantaged communities due substantially higher baseline concentrations.[46] Despite advancements in emission reduction technologies, the total number of vehicle miles traveled (VMT) and number of vehicles on roads continue to increase around the world, potentially counteracting any potential benefits resulting from emission reduction advancements.[36,47] Instead, researchers have estimated that prioritizing improvements to public transit, freight policies and passenger car efficiency, along with shifting away from single occupancy vehicles, could result in the removal of an estimated 2.8 GT of greenhouse gases from cities around the world by 2050.[36,48]

Local Context

While traffic-related air pollution in the project area is a concern, it is one of many sources that impacts the air quality for residents. The IBR Program includes areas proximate to the Port of Vancouver, Pearson Field, Portland International Airport, BNSF railway terminal, and active railways. As climate change contributes to increasing average maximum and minimum temperatures throughout Oregon and Washington[49], the physical and mental health impacts of poor air quality will continue to increase. Wildfires occurring more frequently and for longer durations will exacerbate poor air quality in the region. *(For more information about climate change and health, see the Climate and Health section.)*

Combining the impact of existing sources of air pollution in the Program area, as well as the increasing days of poor air quality from wildfires, contributes to the cumulative health impacts on an individual and community.

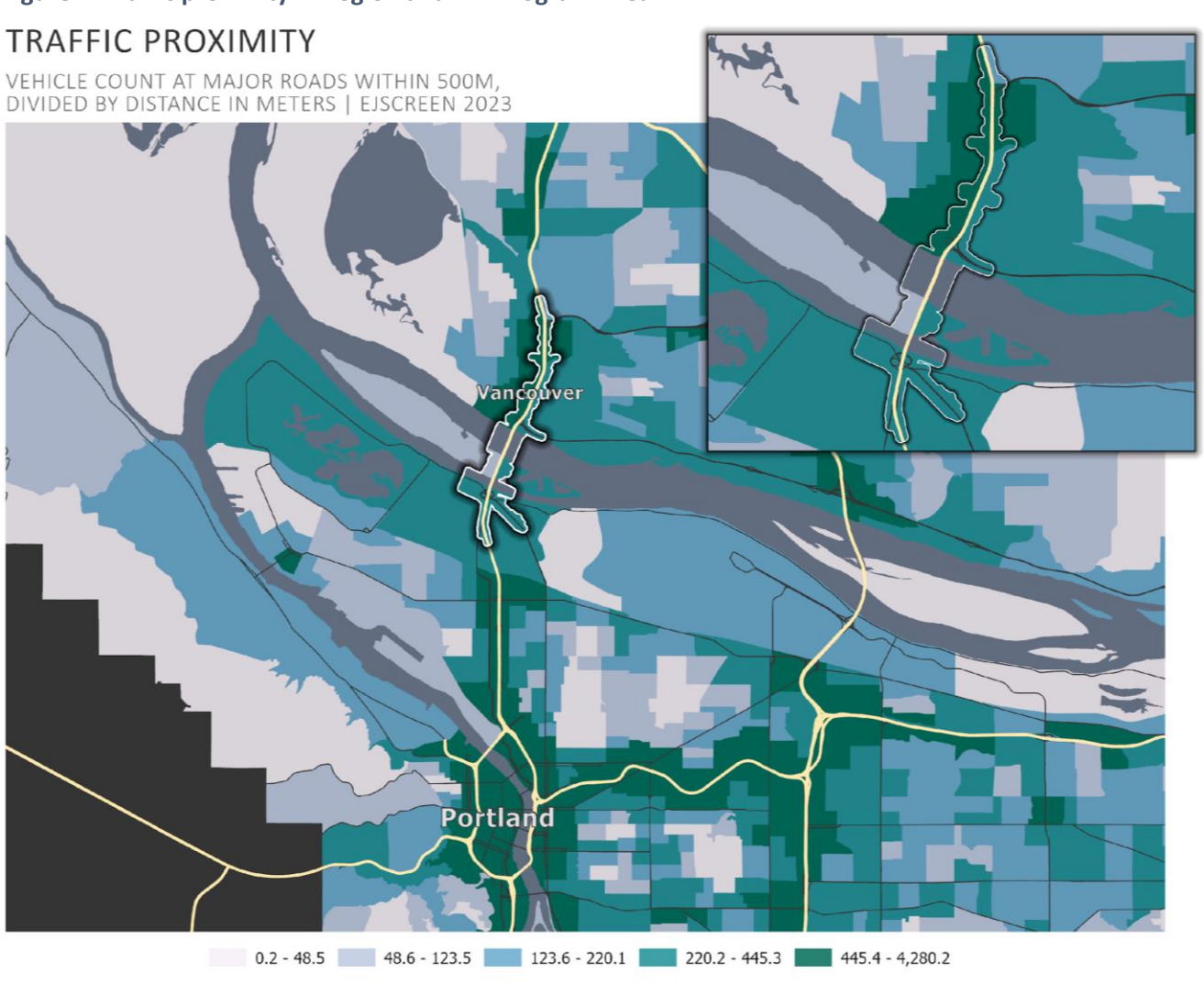
Within the IBR project area, 10% of adults have asthma, 30% have high blood pressure, 14% are children, and 18% are over 65 years old (Tables 3 & 5).[23] According to the Washington State Department of Ecology, Vancouver is identified as "overburdened and experiences high levels of PM2.5".[50] These baseline health conditions of residents in the project area could be further impacted negatively by poor air quality. The average estimated cancer risk from mobile sources of air toxics in the IBR study area is 2.6 cases per million (Table 6).

Table 6. Cancer Risk from Mobile Sources of Air Toxics (Modeled Estimates in Cases per Million). Source: EPA 2020 AirToxScreen[51]

IBR Study Area	Clark County	Multnomah County
2.6 (1.9 - 4.2)	2.0 (0.4 - 3.1)	3.4 (0.4 - 5.7)

The I-5 interstate bridge is an existing contributor to poor air quality, making it a public health hazard for those who live nearby. The air quality analysis presented in the *DSEIS Air Quality Technical Report* suggests that there would not be significant differences in air quality impacts between the Modified Locally Preferred Alternative (LPA) and the No-Build Alternative (NBA) scenarios.[52] However, the air quality analysis in the DSEIS uses a large study area composed of Clackamas, Clark, Multnomah, and Washington counties. Due to this large study area and lack of modeling at a smaller geographic level, it is unclear whether the Modified LPA and NBA scenarios will contribute to improved or worsened local air quality conditions within the project area. Given the existing high traffic volumes along the I-5 interstate bridge, people who live nearby are subjected to greater concentrations of air toxics and are at risk of experiencing additional air quality burdens given the expected 33% increase in VMT under the Modified LPA by 2045.

Figure 7. Traffic proximity in Region and IBR Program Area



Potential Project Impacts

Project Design

The DSEIS states that concentration of air toxics from mobile sources would likely be more pronounced on road segments where traffic volumes would increase under the Modified LPA compared to the No Build Alternative due to diversion to avoid tolls. However, many of these road segments were not included in the air quality analysis conducted by the IBR team. These streets where traffic volumes are projected to increase due to diversion are not easily identified in the DSEIS. The DSEIS states that their analysis of localized health impacts due to air quality changes cannot reliably quantify the duration and magnitude of project-specific increases in air toxics and related health impacts due to uncertainties in the available data. This gap in the data is the basis for a recommendation for more detailed air quality modeling and monitoring in the project area.

Project Construction and Demolition

Construction of the Modified LPA would generate heightened amounts of particulate matter including dust from demolition and preparation and emissions from trucks and construction equipment. The DSEIS *Air Quality Technical Report* describes increase in particulate matter "in the form of fugitive dust, (from demolition, ground clearing and preparation, grading, stockpiling of materials, on-site movement of equipment, and transportation of construction materials), as well as exhaust emissions from material delivery trucks, construction equipment, and workers' private vehicles".[52(p5-1)] It also states that "elevated emissions would likely occur immediately adjacent to the construction activities, staging areas, and material hauling routes". [52(p5-1)] Furthermore, air quality impacts from construction would result in long-term exposure as construction activities would occur during a 9- to 15-year period. At this phase of the planning process, the IBR Program has not developed detailed construction sequencing plans.

There is insufficient information in the DSEIS to show how much of an increase in particulate matter and fugitive dust will contribute to negative impacts on air quality. A comparison is made between this project and the Dan Ryan Expressway in Chicago, where air quality monitoring was done prior to and during construction. It was found with that project, that "the number of times the project action levels were exceeded was low".[52(p5-2)] While a comparison can be helpful, there are still concerns and more clear information needed regarding this project about the specific air quality impacts. Additionally, the DSEIS references the construction of the Dan Ryan Expressway from January 2005 through October 2007, which is a significantly smaller time frame of construction than the IBR Program.[52(p5-2)]

Due to the increased risk from air pollution to children and older adults, construction plans should be made to mitigate impacts to the schools, elder care facilities, and health care facilities. Construction staging and idling vehicles should not occur near those sites. Changes in traffic volume and proximity to residents could change an area from a low pollution area to a high pollution area and increase health risks. A detailed construction plan should also include traffic diversion information and assess the risk of current low traffic areas of becoming high traffic areas during construction. Residents should be made aware of all construction activity, duration, and mitigation measures being taken. Our recommendations reflect the need for more detailed information about air quality impacts and mitigation during construction.

As noted above, demolition will contribute to fugitive dust and negatively impact air quality. An additional concern in addition to the amount of particulate matter released from demolition is the content of the fugitive dust. The DSEIS *Air Quality Technical Report* describes that other than compliance with the EPA's National Ambient Air Quality Standards, there are no specific air quality regulations "governing emission of lead from demolition activities during construction" and that "control of potential lead emission is addressed in the construction contracts".[52(p2-8)] The DSEIS *Hazardous Materials Technical Report* states that the existing Interstate Bridge, and any other structures, that contain lead or asbestos will go through proper abatement prior to demolition.[53(p5-11)] Due to the potential public health, worker health, and ecological impacts of lead dust getting into the air, and settling on soil or water surfaces, more information about mitigation and lead abatement would help assess the likelihood of exposure.

Long-Term Impacts

The DSEIS projects that the Modified LPA would result in a 33% increase in vehicle miles traveled (VMT) by 2045 compared to the 2015 baseline.[52] Despite projected increases in VMT for both the NBA and Modified LPA, the EPA's Motor Vehicle Emissions Simulator (MOVES) model used in the DSEIS resulted in expected reductions in mobile source air toxics (MSAT) emissions by 2045 largely due to incorporation of emission reduction standards from the 2007 EPA Control of Hazardous Air Pollutants from Mobile Sources. This 2007 ruling from the EPA set annual standards for reducing MSATs. Beginning in 2011, the EPA requires fuel refiners and importers to meet benzene reduction stands and vehicle manufacturers to meet non-methane hydrocarbon exhaust emissions standards.[54] The MOVES model used in the DSEIS assumes that fuel and vehicle standards set by this 2007 EPA ruling will be met in 2045, resulting in substantial MSAT reductions compared to existing conditions primarily due to use of cleaner fuels and engines rather than design differences between the NBA and Modified LPA. These assumptions included in the MOVES model, combined with the large geographic scale of this analysis and its output in tons per year, does not provide adequate information for determining possible health impacts associated with the Modified LPA.

According to the DSEIS *Transportation Chapter*, "approximately 14,000 heavy and medium trucks crossed the Interstate Bridge on an average weekday in 2019, accounting for approximately 10% of all bridge traffic".[55(p3.1-8)] Additionally, the Washington State Freight System Plan anticipates that "forecasted truck vehicle miles traveled on the various interstates are expected to increase by 67 percent from 2022 to 2050".[56(p48)] An increase in freight traffic volumes could increase air quality related health concerns, especially for people walking, biking, and rolling on active transportation paths in the vicinity of traffic and freight emissions, housed and unhoused people living nearby, and future housing developments.

From the analysis performed in the DSEIS, the IBR Program concludes that emissions under the No-Build Alternative and the Modified LPA are expected to be substantially lower than emissions under existing conditions. The model predicting emissions in 2045, however, shows negligible difference in predicted emissions the NBA and Modified LPA. These expected decreases in emissions for the Modified LPA also rely on meeting the mode share targets included in the analysis (e.g., people choosing to commute via ride light rail instead of single-occupancy vehicles. The air quality analysis presented in the DSEIS is limited to a select number of road segments within the project area and evaluates air quality impacts for the area as a whole, rather than by each segment.

Environmental Justice & Health Equity

According to the DSEIS, the IBR Program focus area includes five healthcare facilities, six schools, and six assisted living facilities, all of which contain people who are especially susceptible to the health impacts of poor air quality.

While research suggests that the ambient concentrations of air toxics exceed cancer risk benchmarks throughout the country, BIPOC communities and people with lower income experience a disproportionate risk of exposure to these air toxics. This is a result of historic and ongoing sociopolitical factors like residential segregation, uneven industrial development, and neighborhood disinvestment.[57,58]

Research suggests that poor air quality often has a disproportionate health impact for low-income populations and BIPOC communities.[59] Disparities in traffic-related air pollution exposure are larger by race/ethnicity than income and disproportionate to contributions to overall pollution concentrations between different racial/ethnic populations.[36] Uneven tree canopy and vegetative cover further exacerbate the inequitable burden of air pollution and its impact on cardiorespiratory health. Tree canopy and vegetation have been shown to reduce respiratory difficulties[60] by controlling the flow and distribution of air pollutants.[61]

Transportation and Active Transportation

Physical Activity and Health

Literature Review

The development patterns of neighborhoods and cities shapes the travel options that are available to residents, and how feasible it is to walk, bike, roll, take transit, or drive to essential, everyday destinations. Urban planning decisions and design features influence travel options, like the availability and connectedness of sidewalks and bike lanes, mix of land uses, neighborhood density, proximity of recreational and open spaces, design variety and aesthetics, and proximity and access to transit and employment. Improvements in these areas can lead to increases in physical activity.[62,63]

In contrast, urban planning decisions can also discourage active travel. Induced demand is a well-studied concept in transportation infrastructure that describes how when highways expand to include more lanes (supply), traffic increases to use those lanes (demand).[64,65] Induced demand is associated with increased vehicle miles traveled, which in turn has negative effects on physical activity and air quality.[66]

Physical activity improves a wide range of health outcomes across the lifespan. When community design makes active travel safe, feasible, and attractive, physical activity can become an easy option for everyone in their everyday life. Health benefits include improvements in mental health and cognition, stronger bones and muscles, and reduced risk of all-cause mortality, cardiovascular disease, type II diabetes, and several types of cancer.[67,68] Inversely, sedentarism is associated with increases in all-cause mortality, metabolic syndrome, obesity, and unhealthy cardiometabolic biomarkers.[69]

A review of health impact assessments evaluating health benefits and risk from shifting from car travel to active travel found a majority of studies (27/30) determined the benefits outweighed risks.[70] Benefits were primarily driven by increases in physical activity, and include a wide range of outcomes, including improvements in all-cause mortality, cardiovascular disease, stroke, type 2 diabetes, cancer, dementia, depression, life expectancy, and health care costs. The studies found the risks from traffic crash injuries and exposure to air pollution to be minor compared to benefits, though uncertainty exists for demographic subgroups.[70] Changes in physical activity and active transportation in response to changes in large scale infrastructure are highly context specific, difficult to evaluate, and therefore understudied. Existing findings are mixed. A review of physical activity effects from the implementation of new built environment infrastructure changes including traffic-free bridges, an informal boardwalk, and a cycling trail, found inconsistent changes for walking but positive effects for cycling.[71] Despite inconsistent effects in walking, the review found that closer residential proximity to the intervention area was associated with higher levels of physical activity and walking.[71]

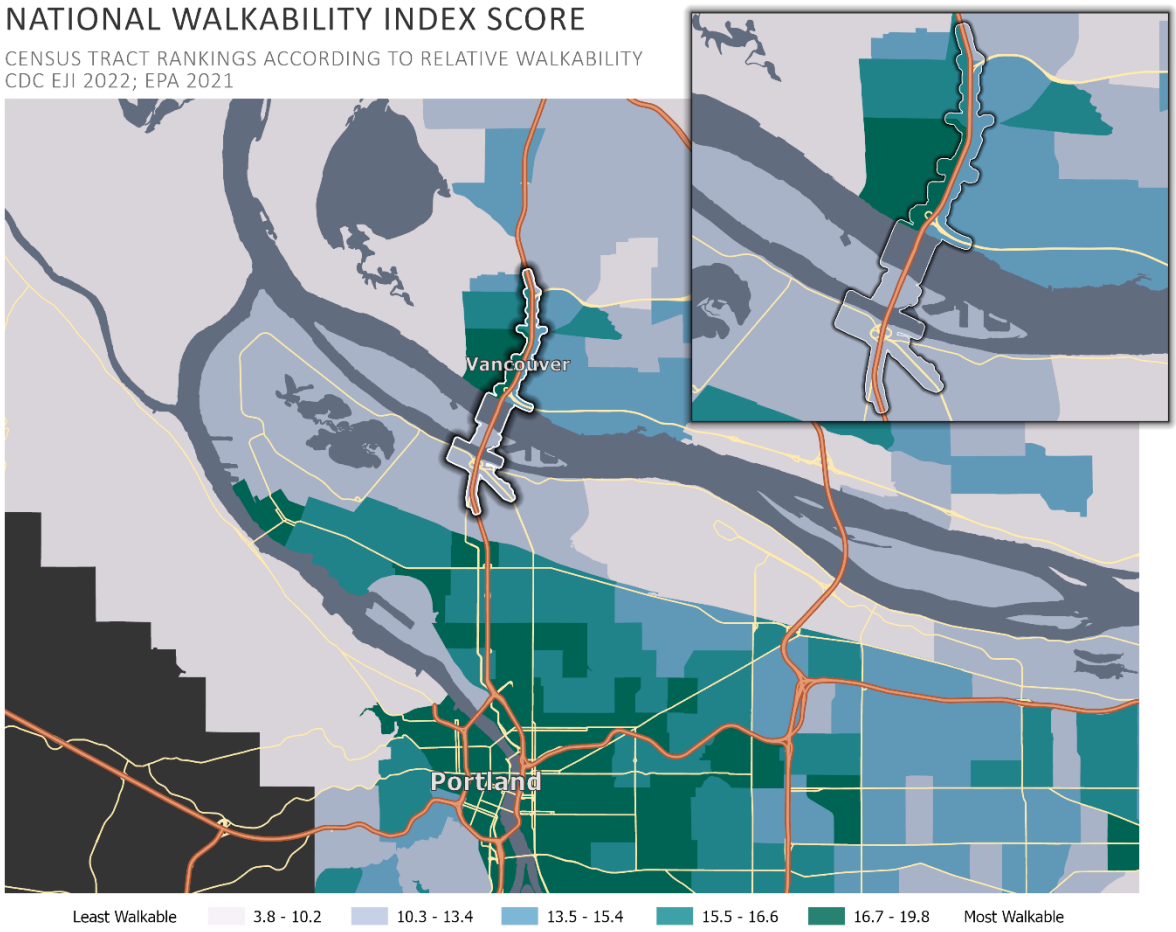
Public transit is associated with increases in physical activity, as people tend to walk or bike to transit stops and stations. A review of natural experiments evaluating the effects of new or extended bus rapid transit or light rail services found that building a new public transit line is associated with an increase of nearly 30 minutes of light to moderate physical activity a week for new users. This is one fifth of the WHO weekly physical activity recommendation.[72] A review of light rail transit effects on physical activity found that new light rail increased user weekly walking rates between 7-40%. There were limited effects on cycling rates.[73] Projects that incorporate built environment changes that affect both transportation systems, like light rail improvements, and the surrounding land use and environmental design, create places that are more welcoming and easier to navigate, which in turn increases physical activity.[74]

Local Context

Active Transportation. Approximately 2.4% of workers over the age of 16 that live in the study area walk to work, and 1.0% bike to work.[75] This proportion is greater than Clark County overall and less than Multnomah County overall. The project study area connects the downtown core of the City of Vancouver, an area with greater walkability (as identified by the EPA EJI), directly to parts of Multnomah County outside of the urban core and lower walkability (Figure 8). The IBR Program conducted a 24-hour bicycle and pedestrian count on the interstate bridge October 19th, 2022 to establish a baseline for travel modelling. The count occurred during a significant smoke event, so program staff adjusted the counts based on the upper threshold reduction percentages identified in Doubleday et al., 2021.[76] It is unclear if these assumptions in this methodology match the IBR program area context. Future analysis would benefit from active transportation counts when environmental conditions are not biasing travel choices.

The *DSEIS Transportation Technical Report* notes that existing active transportation structure is lacking in the project area. Walking and biking path networks are incomplete and often do not meet current design standards, including state, local, and ADA standards, depending on location. Multnomah County land uses in the project area, such as in the Columbia Slough watershed and industrial zones have limited the development of extensive active transportation infrastructure. The existing shared use path spanning the Interstate bridge is narrow and does not allow two-way travel or passing for people biking. I-5 presents a large barrier for people walking or biking Eastbound and Westbound in Vancouver (Section 3.8, *DSEIS Transportation Technical Report*).[77] Community members have also expressed that discrimination and racism can limit outdoor exercise and recreation for communities of color in the region.[78]

Figure 8. National Walkability Score in Region and IBR Study Area



Transit. Trimet and C-Tran provide current transit service in the study area through local, regional, and express bus service and light rail. Full descriptions of available transit service in the project area are in the *DSEIS Transportation Technical Report* section 3.7.[77] The *DSEIS Transportation Technical Report* notes that currently I-5 congestion adversely impacts transit travel times and reliability during peak morning and afternoon travel periods (Section 3.7.6).[77]

Approximately 3.5% of workers over the age of 16 that live in the study area use transit to get to work (Table 7).[75] This is a little more than double the proportion of Clark County overall and a little less than half the proportion of Multnomah County overall. The IBR Program estimates that approximately 3,200 people cross the interstate bridge via bus on a typical weekday (Table 3-28, *DSEIS Transportation Technical Report*).[77(p3-89)]

Car Travel. There are currently three lanes for cars, vans and trucks in either direction along the existing bridge spans (6 lanes total). Approximately 74.5% of commuters drive or carpool in the project study area.[75] The *DSEIS Transportation Technical Report* states that the average weekday daily traffic volume for the I-5 bridge is 143,400 vehicles (Table 3-5, *DSEIS Transportation Technical Report*).[77(p3-18)]

Table 7. Mode Split in IBR Study Area, Clark County, and Multnomah County, ACS 5-Year Estimates* 2018-2022[75]

Mode	IBR Study Area	Clark County	Multnomah County
Car – Drive Alone	67.7%	72.2%	55.1%
Car – Carpooled	5.9%	8.1%	7.8%
Public Transportation	3.6%	1.5%	7.8%
Bike	1.0%	0.3%	3.5%
Walk	2.4%	1.5%	4.5%

**2020 census tract geographies:*
Washington: 410.11, 418, 419, 424, 425, 426.01, 426.02 | Oregon: 72.01, 72.02

Travel-Related Health Outcomes. The IBR project area has slightly higher levels of physical inactivity than Clark and Multnomah County overall. The prevalence of physical activity-related health conditions in the study area, including high blood pressure, cancer, and diabetes, is slightly higher than the surrounding counties overall (Table 5). Disparities within these outcomes vary widely by age, race, ethnicity, sex, and geography.

Potential Project Impacts

Overall, the replacement of the existing I-5 bridge will result in a structure with greater seismic resilience, and minimize the risk of a bridge collapse during an earthquake. This will support continued regional travel and access during the recovery period of a seismic event. Additional effects on health vary by project stage and travel mode, as described below.

Project Long Term Impacts

Active Transportation and Health. IBR Program modeling predicts that active transportation trips will increase with the Modified LPA primarily due to the increased attractiveness of active mode facilities (80-160% increases in active trips) and mode shift from other travel means (15-25% increases in active trips). Modeled estimates predict that daily total active transportation trips could increase to 740 to 1,600 daily active transportation trips (Tables 4-49 and 4-50, *DSEIS Transportation Technical Report*).[77(p4-134)]

An increase in active transportation trips would support the improvement of health outcomes related to physical activity in the study area in the future.

Transit and Health. Using the Metro Regional Travel Model, the *DSEIS Transportation Technical Report* predicts that in 2045 there would be 29,100 transit riders using a part of the planned transit improvements scoped within the IBR Modified LPA (Table 4-40, *DSEIS Transportation Technical Report*).[77(p4-119)] The DSEIS estimates that approximately 36% (12,000) of these riders would be new transit riders that shifted from driving. A majority of transit boardings and departures would occur in Clark County at the Waterfront light-rail transit (LRT) station (24% of total predicted boardings) and Evergreen/I-5 LRT station (61% of total predicted boardings) (Table 4-39, *DSEIS Transportation Technical Report*).[77(p4-117)]

The expected increase in new riders and the addition of three new LRT stations is likely to support increases in physical activity via walking and biking to and from transit stops. This is also likely to support the improvement of health outcomes related to physical activity in the study area in the future.

Car Travel and Health. Using the Metro Regional Travel Model, the *DSEIS Transportation Technical Report* projects that traffic volumes crossing the interstate bridge in 2045 will increase regardless of current design options, ranging from 0.93%-1.07% per year.[77(p4-12)] Average weekday daily traffic volumes over I-5 are predicted to increase by 26% in the no-build scenario and 23% in MLPA option Table 8). MPLA traffic volumes are smaller due to the increased availability of transit options that would be provided and diversion resulting from tolls. The *DSEIS Transportation Technical Report* estimates that the MLPA with the addition of two auxiliary lanes would result in similar peak travel volumes. The auxiliary lanes would reduce congestion-related delays by 33% in either direction compared to the hours of congestion forecast in the MLPA without auxiliary lanes. Depending on how many lanes are in the final design, the IBR program area could experience induced demand, which would likely increase vehicle miles traveled. Our recommendations reflect the need for more appropriate modeling to identify potential health impacts, including consideration of the number of lanes in design options.

Despite the forecasted reductions in travel times for car travel, traffic volumes and vehicle miles traveled are projected to continue to increase. This will likely result in little to no change in health outcomes related to car travel, physical activity, and sedentary behavior at the population level.

Table 8. Predicted Travel Changes along I-5 in IBR Study Area by Mode, ODOT DSEIS Transportation Technical Report[77]

Mode/Metric	Existing	No-Build	Modified LPA
Car			
Average Weekday Daily Traffic Volumes *(Page 4-13, Table 4-5)*	143,400	180,000 (26% increase)	175,000 (23% increase)
Vehicle Miles Traveled	Not cited in DSEIS	436,400	424,900
Transit			
Regional Transit Mode Share *(Page 4-113, Table 4-38)*	Not cited in DSEIS	5.26%	5.37%
Weekday Corridor Daily Transit Ridership *(Page 4-119, Table 4-40)*	Not cited in DSEIS	14,900	29,100
Bike			
Daily Trips *(Page 4-134, Tables 4-49 and 4-50)*	279 (205 unadjusted)	No change	740-1,600 (combined biking and walking)
Walk			
Daily Trips *(Page 4-134, Tables 4-49 and 4-50)*	132 (91 unadjusted)	No change	740-1,600 (combined biking and walking)

Project Construction

IBR construction will affect all regional travel patterns and modes for 9 to 15 years depending on project implementation. Construction would require nighttime closures of I-5 and surrounding arterials that would result in rerouting and potential congestion and delays. The project may affect existing transit operations including alterations to existing light rail operations along the Yellow line, delays for bus routes that need to be rerouted or encounter construction-related congestion, and the relocation of bus stops in affected project areas. To the extent practical, the active transportation crossing over the bridge will remain open, but surrounding sidewalks, shared use paths, and bicycle lanes may be closed and rerouted. This may negatively affect access to employment, health care, and other needed services, especially for those that are transit dependent or do not have car access.

Environmental Justice and Health Equity

Some groups face greater or additional barriers to engaging in regular physical activity through active transportation. Fear of crime and perceived safety from other road users can influence travel choices for children/parents, older adults, and people that don't identify as male.[79,80] In Multnomah County, census tracts with higher densities of intersections, an indicator of walkability, tend to have lower shares of BIPOC residents. The same pattern exists for population percentage within ¼ mile of a bus or light rail stop.[81]

The *DSEIS Equity Technical Report* evaluated potential changes in mode shift benefits by analyzing increases in transit and driving access improvements for equity priority communities identified by the IBR Program. While the analysis found improvements across the board for program area residents, benefits were not equally (nor equitably) distributed. Transit access to jobs for BIPOC residents, communities with limited English proficiency, immigrants and refugees, and people under the age of 25 did not increase as much as it did for white, non-Hispanic residents (Table 4-2, *DSEIS Equity Technical Report*).[82(p4-3)] This indicates disparities would continue to remain, likely reinforcing disparities in opportunities for physical activity. Additionally, the *DSEIS Equity Technical Report* does not include spatial analysis of active transportation benefits within the program area for equity priority communities. Further evaluation of distribution of the benefits would inform decision-makers and community advocates in further policy or programmatic interventions are needed to reduce existing disparities.

Road Safety

Literature Review

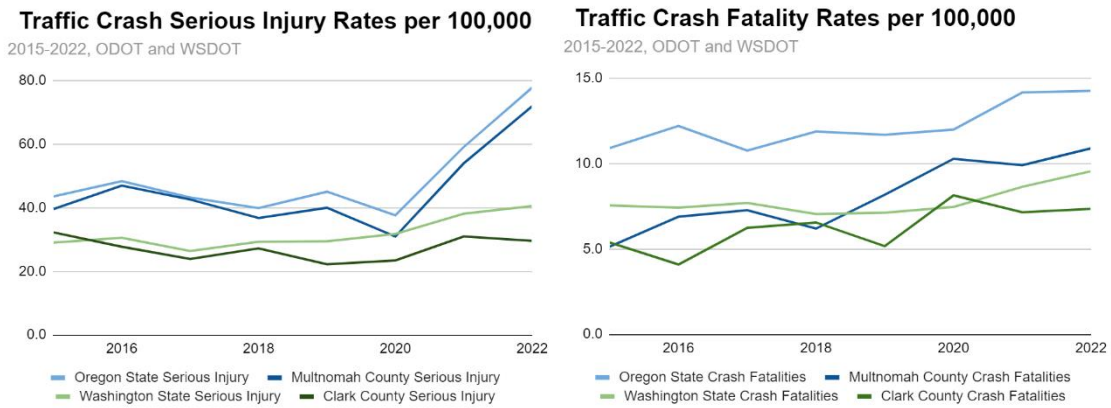
Transportation safety is a primary public health and transportation concern. Traffic crashes are a leading cause of death in the United States, and fatality rates have been increasing in recent years. Motor vehicle crashes specifically are the leading cause of death for teenagers.[83]

The Safe System approach to road safety is a multi-tier approach to improving road safety based on the fact that people make mistakes in the roadway and that humans cannot withstand the crash forces they experience from vehicles. Interventions and design principles focus on encouraging safer speeds, designing roads that encourage safer behavior, cultural shifts to promoting safety for all amongst all modes, making vehicles safer, and improving post-crash care.[84] These strategies align with core public health intervention approaches to change the context in which people operate to promote healthier actions and improve population health.[85] System-level interventions focused on safe speeds include focusing on highway design and implementing tools to encourage compliance with speed limits and manage traffic flow and density.[86]

Local Context

Locally, serious injury and fatality rates per 100,000 have been steadily increasing since 2015 (Figure 9). In 2022, there were 88 crash-related fatalities in Multnomah County and 37 in Clark County. That same year, there were 581 serious injuries related to crashes in Multnomah County, and 149 in Clark County. Since 2020, the serious injury crash rate per 100,000 has almost doubled in Multnomah County.

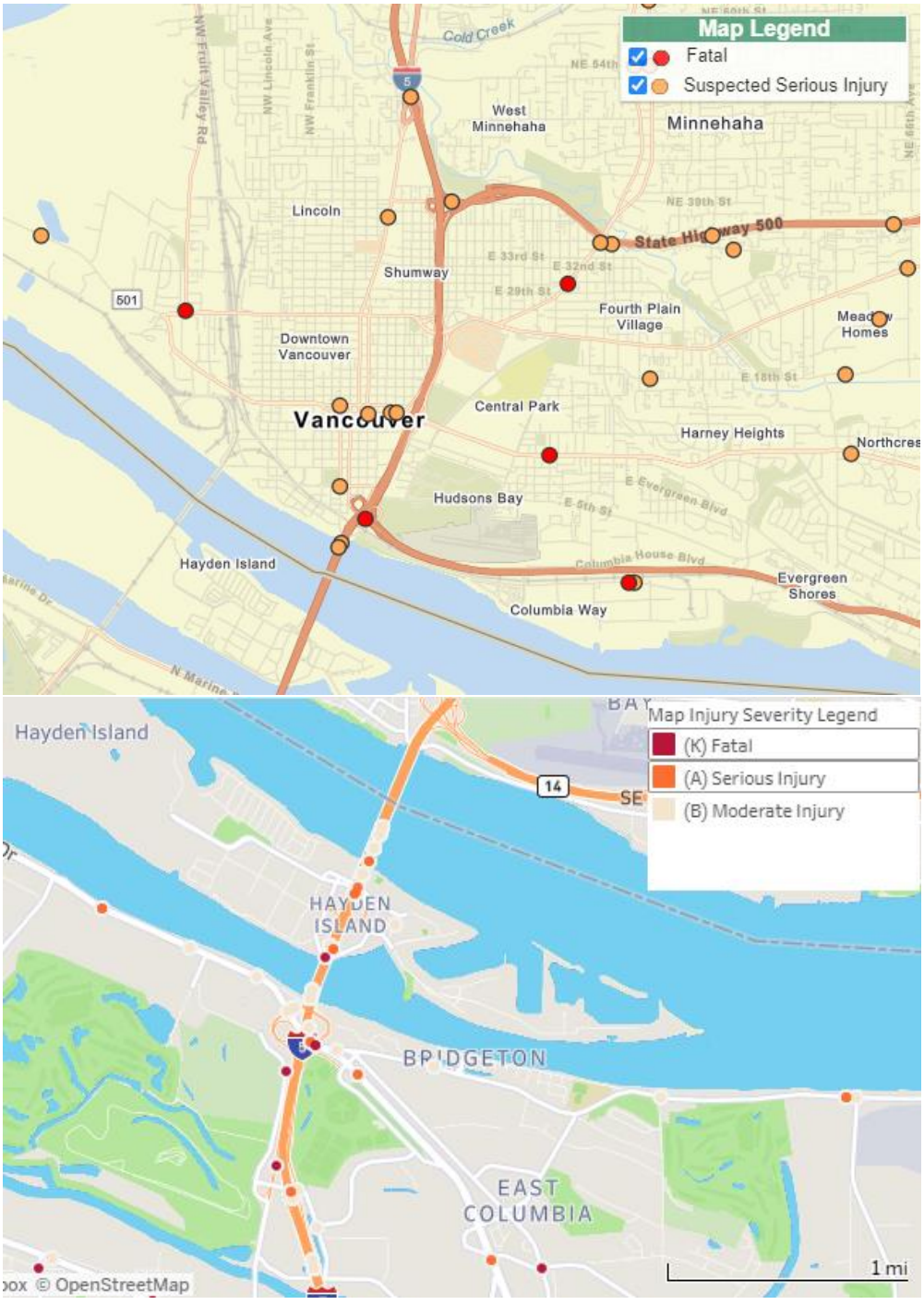
Figure 9. Rates per 100,000 for traffic crash serious injuries and fatalities. 2015-2022. Source: ODOT Crash Data Viewer, WSDOT Crash Data Portal, ACS 5-year population counts.[75,87,87]



The *DSEIS Transportation Technical Report* includes crash data from 2015 through 2019. Between 2015 and 2019 there were 2,270 crashes that occurred within the study area between 2015 and 2019. A little over half of these occurred on the I-5 mainline (Table 3-34, *DSEIS Transportation Technical Report*).[77(p3-117)] Overall, 38% (n=856) resulted in an injury, 1.5% (33) resulted in a serious injury, and 0.3% (7) resulted in a fatal injury. Seventeen involved a bicycle and 30 involved someone walking (Table 3-37, *DSEIS Transportation Technical Report*). [77(p3-120)]

In 2022, there were five fatal crashes within the IBR study area, four in Multnomah County and one in Clark County (Figure 10).[87,88] This is two short of the seven total identified over a five year span in the DSEIS Transportation Technical Report.

Figure 10. Fatal and serious injury crashes in IBR study area, 2022 Source: ODOT Crash Data Viewer, WSDOT Crash Data Portal.[87,88]



Black residents experience a disproportionate amount of transportation safety concerns in the region. Not only do Black community members experience higher death rates from traffic crashes and visits to the emergency room for traffic-related injuries, they also experience biased behavior, harassment, violence, and unfair policing. This stems from racism and racist systems baked into regional housing, transportation, and law enforcement practices.[89] Involving community in redesign for their neighborhoods can proactively encourage more, better, and safer options for everyone.

Potential Project Impacts

The *DSEIS Transportation Technical Report* relies on the Enhanced Interchange Safety Analysis Tool (ISATe) estimated to predict changes in crash frequency that may occur with and without implementation of the MPLA. ISATe predicts that across the freeway network there will be up to a 28% increase in total crashes with the No-Build Alternative, and up to a 15% increase in crashes with the Modified LPA.[77(p4-159)] The ISATe model assumes fewer crashes will occur with more lanes, and therefore predicts that the MPLA option with two auxiliary lanes would reduce crash frequency by an additional 4% compared to the MPLA with one auxiliary lane, for a total net increase in crash frequency of up to 11%.[77(p4-161)]

The DSEIS Transportation Technical Report does not provide further detail on changes in crash type, severity, location, or time due to uncertainty in ISATe, but notes removal of the bridge movable span could further reduce crashes in the MLPA. ISATe predicts that changes in crash frequencies will be negligible, with the exception of a small increase at the intersection of Evergreen Boulevard and C Street.[77(p4-160)] The *DSEIS Transportation Technical Report* provides a descriptive account that safety outcomes for active transportation modes would improve because of facility improvements, but no additional evidence or analysis is provided. There is inadequate information to conclude to what degree severe injury and fatalities will be reduced with implementation of the MPLA.

Environmental Justice and Health Equity

Urban development that supports safe physical activity is not evenly distributed across the region. Some corridors in the region have higher crash rates than others, known as high injury corridors. Sixty-five percent of high injury corridors on regional roadways are through areas with higher proportions of communities of color, people with low-income, or people with limited English.[90] Who lives in areas that support active transportation today is shaped by past patterns of housing discrimination and disinvestment, disproportionately excluding communities of color and low-income communities.[91] The DSEIS does not assess how changes in travel safety across each mode type might vary by priority environmental justice community.

Transportation Access Literature Review

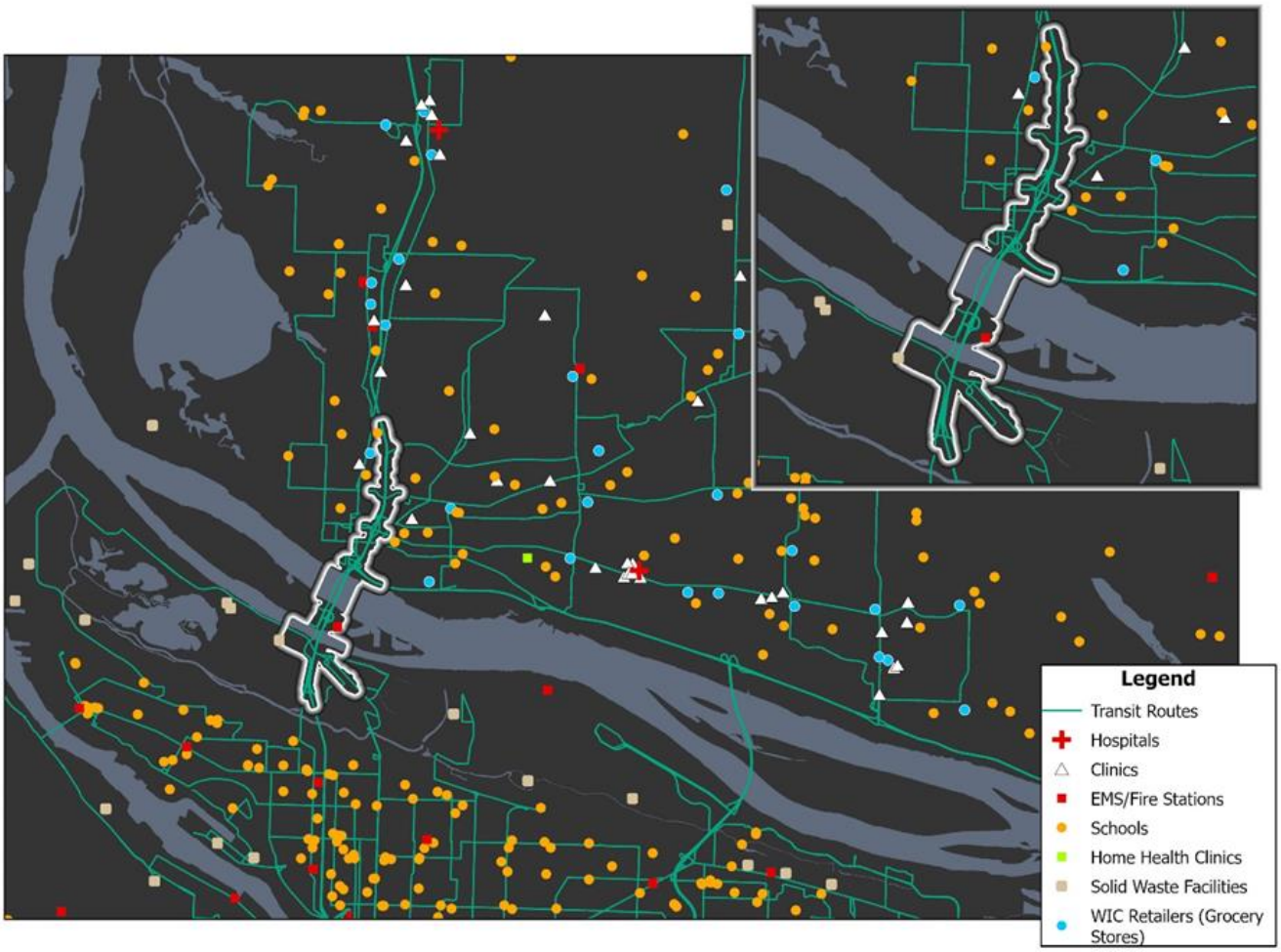
Literature Review

Transportation barriers are a major factor in accessing and maintaining healthcare across the United States. Lack of transportation can lead to delays in accessing health care, which can lead to delayed diagnosis, treatment, and reduced health outcomes. It can also disrupt care through missed appointments, disrupt access to pharmacies for medication, and create longer transit times to access care which requires additional time off work and added childcare burden.[36,92] Of particular concern is how unmet transportation needs impact children's access to health care including mental health care, "obtaining medication, accessing dental care, immunizations, chronic illness care, specialized care, and follow-up emergency care".[93] Children of color, children with vulnerable citizenship status, and children whose caregivers need financial support experience the health care impacts of transportation burden at higher rates.[93]

Potential Project Impacts

The IBR Program will naturally include some amount of disruption to daily life for community members living and working in and around the project area. The map below (Figure 11) includes some (though not all) examples of essential services, access to which should be considered and maintained as much as possible during program planning and execution. Mapping was restricted to data made publicly available by individual states, counties, and local municipalities, which causes some variation in data availability, especially across state lines. Date of most recent update also varies across data sources. Therefore, this map should not be considered a complete or up-to-date picture of the community. Locations like schools, grocery stores, clinics and hospitals, pharmacies, emergency services, transit stops, and public utility facilities are essential to the daily functioning of the community. Disruption of access to these services can have significant impacts on individual and community well-being. Those individuals that will have to find a new route through or around IBR-related construction to reach their essential services are particularly vulnerable.

Figure 11: Essential services and facilities in and near the IBR Program area.



Sources: Oregon Metro RLIS[94] (transit routes including buses and rail lines, hospitals, fire stations, schools, solid waste facilities), City of Vancouver[95] (transit routes including buses and rail lines), Washington Department of Health[96] (clinics, EMS stations, home health clinics, WIC retailers), and Washington State Office of Superintendent of Public Instruction (schools)[97]

Project Construction

Over the course of the construction period travel routes will change due to road closures, lane closures, traffic detours, relocation in bus stops, transit station closures, transit schedule changes, and sidewalk and bicycle lane impacts.[77(p5-3)] Additionally, changes in travel patterns due to construction could lead to increased congestion and diversion on alternative rates, increasing the risk of additional delay, as well as crash frequency (Table 5-1, *DSEIS Transportation Technical Report*).[77(p5-5)] The *DSEIS Environmental Justice Technical Report* also notes that if the sidewalks over the I-5 bridge are closed, access across the river could be cut off entirely for people whose only mode of travel is on foot or by bike, because the I-205 bridge is not a practical distance for an alternative.

These construction-related transportation barriers will affect access to homes, jobs, schools, health care facilities, and other essential destinations. This has the potential to create acute stress, make chronic stress worse, and interrupt access to programming and services that keep people healthy.

Long Term Effects

The improvements in light rail and transit service will generally increase access to jobs and other services in the region. Although, as mentioned above, improvements are not the same among sub groups, and access to jobs for BIPOC residents, communities with limited English proficiency, immigrants and refugees, and people under the age of 25 will not increase as much as it will for white, non-Hispanic residents (Table 4-2, *DSEIS Equity Technical Report*).[82(p4-3)]

Evaluation of potential tolling scenarios in the *DSEIS Environmental Justice Technical Report* found that some environmental justice populations might experience adverse effects. Despite improvements in trip time, reliability, and alternative transportation options, some low-income households may still experience disproportionate financial burden in scenarios where they have no other choice to drive over the bridge and pay the toll.[98(p4-40)]

Environmental Justice and Health Equity

Transportation access to healthcare often disproportionately affects older adults, people with disabilities, veterans, people with chronic health conditions, and people of color. Disproportionate negative impacts are also experienced by pregnant people, people with young children, and people experiencing homelessness.[92] Even when studies controlled for socioeconomic status, they still found higher transportation barriers and decreased healthcare access among communities of color.[99] As mentioned above, tolling may create a disproportionate financial burden on low-income households unable to benefit from improvements in transit and active transportation options, such as someone needing medical care. This could create an additional barrier to health care, as well as other essential services.

Noise

Literature Review

Health concerns associated with noise exposure include cardiovascular disease, diabetes, reduced cognitive functioning, annoyance, stress, sleep disturbance, adverse birth outcomes, and noise-induced hearing loss.[36,100,101] Noise exposure also affects quality of life, mental health, and sleep quality, which are essential for health. Health impacts can result from short, intense sounds as well as loud background noise.

Children, older adults, shift workers, and construction workers are at greater risk for noise-induced health effects.[102] Noise exposure and noise disruptions can cause increased attention issues, decreased reading comprehension, communication difficulties between children and their teachers, and increased stress and blood pressure in both adults and children.[103,104] Students learning in their second, third, or more language may be at an even greater disadvantage than other students when faced with a noisy learning space.[105]

Older adults, shift workers, and people with preexisting sleep disorders are more sensitive to noise-induced sleep disturbance, which can occur when noise levels are as low as 33 dBA.[106] Sleep disruptions strain the cardiovascular system, disrupt circadian rhythms, and raise blood pressure.[107] These sleep disruptions can lead to long-term health problems like cardiovascular disease. Undisturbed sleep is essential for daytime functioning, health and wellbeing.[106]

For workers, the National Institute for Occupational Safety and Health (NIOSH) recommended exposure limit for occupational noise is 85 dBA over an 8-hour period and the Occupational Safety and Health Administration (OSHA) requires a hearing conservation program at this level to protect from hearing damage.[108,109] While not regulatory, the U.S. EPA and WHO recommend noise exposure limits to protect against adverse health effects and hearing loss. For 24-hour averaged exposure, the U.S. EPA recommends a 45 dBA (indoor) and 55 dBA (outdoor) exposure limit to protect against adverse health effects, and a 70 dBA exposure limit to protect against hearing loss.[107,110] The WHO recommends limiting road traffic noise to 53 dBA during the day, and 45 dBA at night to prevent adverse health effects.[101] These are all more protective than the A WSDOT (65 dBA), ODOT (66 dBA), and FHWA (67 dBA) noise limits, which are regulatory (see Table 9 below).

Noise pollution, like other types of air and environmental pollution, is not equitably distributed. In the United States, people of color and immigrants are overrepresented in construction jobs with a higher risk of injury.[102] People with lower income and people of color are more likely to be exposed to both more noise and environmental pollution.[101,102] Systemic racism and other inequitable urban development and land use practices historically and presently contribute to poor health outcomes for people of color and people with low income. Exposure to noise pollution further increases risk of adverse health outcomes.

A WHO systematic review on noise interventions and health outcomes found that evidence, though limited, shows that transport noise interventions benefit health.[111] It is generally difficult to consistently study the link between environmental noise interventions and health outcomes. There are several studies on noise levels affected by noise mitigation, but fewer that explicitly study the link between noise mitigation and health outcomes.

Explanation of noise measurements

Sound intensity or pressure is measured in units of decibels (dB). The decibel scale is logarithmic, which means small increases in dB result in increasingly louder sounds to the human ear. For every 3db increase, the sound intensity doubles, and for every 10 dB increase, the sound is 10 times louder. For example, a 10-dB noise is 10 times louder than 0 dB, and a 20-dB noise is 100 times louder than 0 dB. The A-weighting noise scale (dbA) is more sensitive to the range of human hearing.

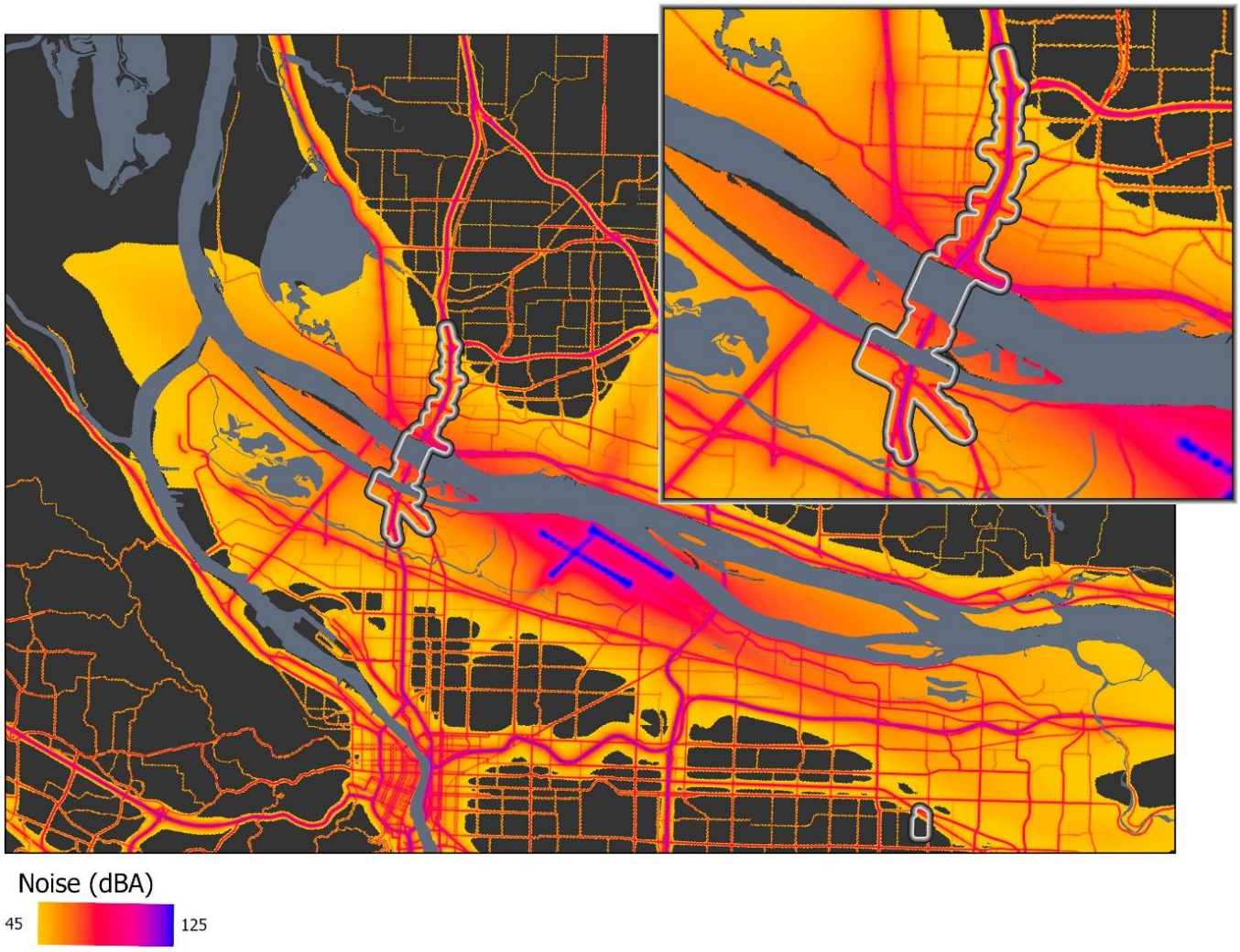
Noise levels are reported using different units and acronyms that describe the how, what, and when of the noise measurement. A-weighting is the standard for environmental noise assessment. In the noise modeling process, some noise levels are weighted differently to account for the fact that people are more sensitive to noise during typical nighttime sleeping hours than during the day, which is why some recommendations include different levels for day and nighttime.

Local Context

In the IBR Program focus area, 30% of individuals have high blood pressure, 14% report poor mental health, and nearly 10% have diabetes.[23]

The project area neighbors Portland International Airport, Pearson Field, Portland International Raceway, and active railways. Road, air, and rail traffic contribute to existing noise pollution, with average 24-hour noise levels ranging from 45 dBA in locations farther from transportation infrastructure and increasing up to 89 dBA near/on roads, railways, and airport locations (Figure 12).

Figure 12. 24-hour average noise levels (decibels A) in and near the project area from road, aviation, and rail traffic in 2020. Source: USDOT Bureau of Transportation Statistics[112]



The DSEIS includes noise measurements to establish existing conditions. Noise measurements were taken from various locations: schools, park trails, residences and hotels, libraries, museums, and athletic fields. The FHWA, ODOT and WSDOT have noise abatement criteria for different categories of indoor and outdoor space (see Table 9).[113]

Table 9. ODOT, WSDOT and FHWA Noise Abatement Criteria for Hourly Average Noise Levels[113]

	ODOT	WSDOT	FHWA
	Noise Abatement Criteria Hourly A-Weighted Sound Level Decibels (dBA)		
Residential (single and multi-family units) (Exterior)	65 dBA	66 dBA	67 dBA
Schools, libraries, hospitals and medical facilities, day care centers, auditoriums, places of worship, active sport areas, trails (Exterior)	65 dBA	66 dBA	67 dBA
Schools, libraries, hospitals and medical facilities, day care centers, auditoriums, places of worship (Interior)	50 dBA	51 dBA	52 dBA
Commercial areas, hotels, offices, restaurants/bars (Exterior)	70 dBA	71 dBA	72 dBA

The Washington State Board of Health's Chapter 246-366 WAC requires noise to be below well WSDOT thresholds, at 55 dBA hourly average, for new school siting and existing instructional school spaces, with exceptions where approved sound reduction is used in construction.[114] In existing indoor spaces, background noise must be below 45 dBA over a 30-second average (with the ventilation system running). Multiple schools are near the project area in Vancouver, including elementary, middle, and high schools, a community college, and the Washington State School for the Blind. Discovery Middle School was the only school location where noise measurements were taken for the DSEIS (Table 2-11, *DSEIS Noise and Vibration Technical Report*).[113(p2-25)] Measurements were also taken at an athletic field at Clark College.

Current traffic noise levels approach or exceed ODOT noise abatement approach criteria in 50 locations in Portland—primarily residences—including 18 floating homes, multi-level apartment units, and one restaurant. There are 110 locations in the Vancouver project where traffic noise levels currently exceed WSDOT noise abatement criteria, including residential locations, offices, and outdoor recreational spaces.

Current noise levels ranged from 57 dBA (Leverich Community Park Disc Golf/Picnic in Vancouver) to 77 dBA (Discovery Middle School and the intersection of Columbia St. and W. 4th St. in Vancouver). Noise levels in residential areas in north Vancouver ranged from 56 to 77 dBA, with loudest areas near noise wall openings or in areas without noise walls. Noise levels for residential floating homes in North Portland ranged from 66 to 69 dBA.

Potential Project Impacts

Project Design

The DSEIS determined that noise walls are the only feasible form of noise mitigation for the project. The DSEIS evaluated 18 potential noise walls, including the removal of existing noise walls and construction of upgraded noise walls, and determined 10 to be feasible and reasonable for consideration in project design. With mitigation, the Modified LPA would have 93 fewer traffic noise impacts than under the No-Build Alternative.

Project Construction

The DSEIS considers construction noise levels over a 9-year period. Maximum noise levels could reach up to 82-94 dBA at the closest receiver locations. In the *DSEIS Noise and Vibration Technical Report*, Table 5-1 details typical construction equipment used for the Modified LPA and demolition, their project use, and maximum noise level. Table 5-2 includes average maximum noise levels for construction activities, including demolition of existing buildings (93 dBA), staging for construction (94 dBA), and other activities like installing signage (91 dBA) (Table 5-2, *DSEIS Noise and Vibration Technical Report*).[113(p5-5)]

Long-Term Impacts

In Portland, the Modified LPA would approach or exceed ODOT noise abatement criteria at 60 residences and one sports field.[113(p4-13)] This varies slightly from the total count of residential exceedances listed in the *DSEIS Noise and Vibration Technical Report* Table 4-1, which is 63 residences. The *Technical Report* modeled noise levels for the Modified LPA, No-Build Alternative, and Existing Conditions. In Vancouver, the Modified LPA would approach or exceed WSDOT noise abatement criteria in 138 locations, including residences, offices, and outdoor space at the Vancouver Community Library and Discovery Middle school. Table 10 includes the number of locations that exceed noise abatement criteria under existing conditions, the Modified LPA, and a No-Build Alternative.

Table 10. Noise exceedances under the Modified LPA, No-Build Alternative, and Existing Conditions

	Modified LPA noise exceedance locations	No-Build noise exceedance locations	Existing Conditions noise exceedance locations
Portland*	65	64	50
Vancouver#	138	151	110
Project Area Total	203	215	160

*Sources for Portland exceedances: Table 4-1 DSEIS Noise and Vibration Technical Report (Modified LPA); Table 4-1 DSEIS Noise and Vibration Technical Report (No-Build); Table 3-1 DSEIS Noise and Vibration Technical Report (Existing Conditions)

#Sources for Vancouver exceedances: Tables 4-4, 4-6, 4-8, 4-10 DSEIS Noise and Vibration Technical Report (Modified LPA); Tables 4-3, 4-5, 4-7, 4-9 DSEIS Noise and Vibration Technical Report (No-Build); Tables 3-2, 3-3, 3-4, 3-5 DSEIS Noise and Vibration Technical Report (Existing Conditions)

In Portland, under the Modified LPA "most locations would experience an increase of 2 to 4 dBA over existing conditions, with increases of up to 11 dBA at one location".[113(p4-12)] Again, since decibels are on a logarithmic scale, a roughly 3-dB increase doubles the intensity of the sound, and a 10-dB increase means the sound is 10 times louder. Compared to the No-Build Alternative, noise levels under the Modified LPA would range from 2 dBA above to 2 dBA below current levels (p. 4-12) Jantzen Beach RV Park would experience the greatest increase in noise levels (4 to 11 dBA increase above Existing Conditions, and 4 to10 dBA above No-Build Alternative).

In Downtown Vancouver, under the Modified LPA, "noise levels would approach or exceed the WSDOT noise abatement criteria at the same 37 multi-family residences as existing conditions along with four additional residences[…]"[113(p4-32)] Modified LPA noise levels would be within 3 dBA of the No-Build Alternative at most locations; some areas will experience up to an 8 dBA reduction or increase under the Modified LPA.

In Fort Vancouver, traffic noise level exceedances for trails would be the same under the Modified LPA and No-Build Alternative. Two residences and two offices would experience increases. "Compared to the No-Build Alternative, traffic noise levels Under the Modified LPA are expected to increase throughout much of the Fort Vancouver area by up to 10 dBA..." and decrease by 4 dBA in other areas.[113(p4-44)]

In Vancouver East of I-5 and North of Mill Plain, the Modified LPA would exceed WSDOT noise abatement criteria at 26 locations, compared to 31 under the No-Build Alternative. West of I-5 and North of Mill Plain, the Modified LPA would exceed WSDOT noise abatement criteria in 54 locations, which is the same number of locations as Existing Conditions and No-Build Alternative, while the specific sites vary slightly. Notably, an up-to-10 dBA increase under the Modified LPA compared to No-Build Alternative is possible for residences near proposed ramp improvements (between E 33rd and E 35th Streets).

Environmental Justice and Health Equity

The Washington State Board of Health's Chapter 246-366 WAC requires noise to be below specified thresholds for new school siting and existing instructional school spaces. In existing spaces, background noise must be below 45 dBA and 70 dB (over a 30 second average).[114] Table 2-11 of the *DSEIS Noise and Vibration Technical Report* states that a 77 dBA noise level was measured at Discovery Middle School.[113(p2-25)] The DSEIS determined that noise walls are the only feasible form of noise mitigation for the project; however, the DSEIS states that the noise wall proposed to reduce noise for Discovery Middle School and seven nearby residences (Noise Wall 1) did not meet WSDOT criteria for reasonableness because its cost estimate exceeded WSDOT reasonable allowance criteria.[109(p7-12)] A shortened wall is recommended for consideration, though it would not reduce noise impacts for Discovery Middle School. As discussed above, children are particularly sensitive to attention, learning, and health impacts of noise exposure. Our recommendations reflect necessary attention toward mitigating noise exposure to lower levels than currently impacting Discovery Middle School and potentially impacting the school under the Modified LPA.

Additionally, the project area is adjacent to Portland International Airport and active railways. Neighborhoods in the project area—particularly Hayden Island, Bridgeton, and East Columbia in Portland, and Columbia Way, Hudson's Bay, Esther Short and Arnada in Vancouver—already experience combined noise pollution of road and aviation traffic. Project construction will add to combined noise levels. Further, potential traffic diversion to the I-205 bridge during construction and/or tolling may increase combined noise and air pollution to neighborhoods east of the project area.

The *DSEIS Environmental Justice Technical Report* describes higher levels of noise and vibration will that negatively and disproportionately impact communities identified as equity priority communities. Seven residences in the Rose Village neighborhood—identified by IBR as a "meaningfully greater EJ area for both low-income and minority populations"—would experience increased noise levels by 2-12 dBA under the Modified LPA.[98(p4-10)] The project currently proposes a noise wall to mitigate noise impacts to affected households in Rose Village. The *DSEIS Environmental Justice Technical Report* also identified the potential for disproportionately high levels of noise and adverse effects in the East Columbia and Esther Short neighborhoods, which are high-priority environmental justice areas identified by the Program.

Climate Change and Health

Literature Review

Changes in climate and the environment can have profound impacts on human health. The Northwest region is already experiencing climate change impacts, and the impacts of climate change on health are projected to increase with warming global temperatures.[115,116]Climate-related hazards such as heat and increasing heat waves, wildfire smoke and air pollution, severe weather and flooding are associated with numerous adverse health outcomes.[116–118] Hotter and longer heat waves are associated with heat-related illnesses, adverse maternal and infant health outcomes, mental health impacts, cardiovascular failure, and death.[119] In addition to extreme heat, climate change also increases the probability of other severe weather events, including flooding, which may cause injury, water contamination, and even death.[120,121]

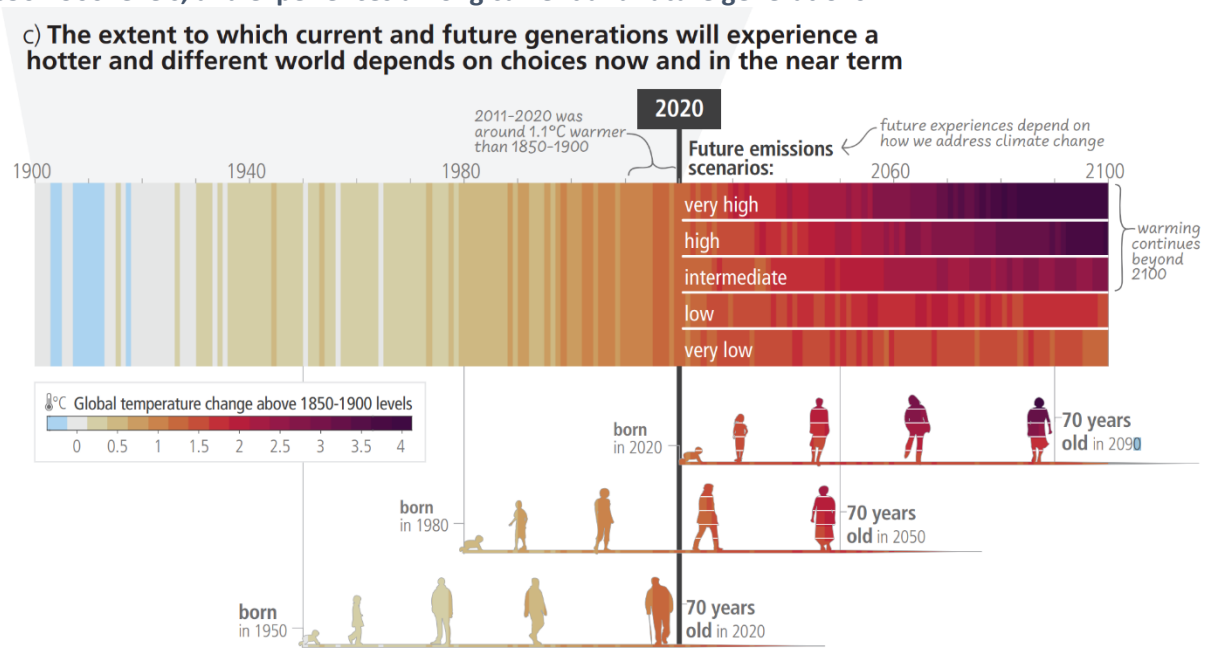
Climate-related hazards can compound to worsen existing exposures.[122] For example, excess heat may also exacerbate existing hazards related to air quality mentioned previously (Charlson et al., 2021; NIH, 2022). Additionally, across hazards, climate change threatens mental health and wellbeing.[42]

Potential Project Impacts

The IBR Program has the potential to affect climate impacts through greenhouse gas (GHG) emissions during project construction and operation of the bridge. The *DSEIS Climate Change Technical Report* outlines opportunities and a framework to limit and reduce GHG emissions to align with local, state, and federal climate and sustainability goals.[123(p1-9-1-13)] The *report* states the Modified LPA is "anticipated to reduce GHG emissions compared to the No-Build Alternative" based on the extension of light rail service, strategies to reduce congestion and idling, opportunity to reduce travel demand, and options to increase mode shift and infrastructure for active transportation.[123(p1-7)] Both the No-Build Alternative and Modified LPA are estimated to result in fewer GHG emissions in 2045 compared to the 2015 baseline based on existing regulatory requirements (*see MOVES model, Air Quality section*) and an expected shift in electric vehicle uptake.[124(p3.19-16)] Assuming adoption of electric vehicles in accordance with Oregon and Washington state rules, the MLPA is estimated to reduce total GHG emissions around 1% (MT CO2e/day) in the traffic subarea in 2045, compared to the No Build Alternative.[124(p3.19-18)] This daily reduction is equivalent to around eleven gasoline-powered passenger vehicles driven for one year.[125] Construction of the new bridge will produce GHG emissions, and construction may impact emissions due to traffic delays.[124(p3.19-19-20)] The *DSEIS Climate Change Chapter* notes "emissions generated from the construction of any of the Modified LPA design options would be similar."[124(p3.19-6)] As mentioned in the Air Quality section, the IBR Program has the potential to mitigate climate impacts through design that encourages and increases opportunity for transportation mode shift. Reducing GHG emissions now and in the short-term can mitigate future climate change impacts and global temperature change that directly and indirectly affect health outcomes (Figure 13).[126]

Hazard-specific potential project impacts are included in sub-sections below.

Figure 13. Overview of future emissions scenarios and projected global temperature change above 1850-1900 levels, and experiences among current and future generations



Source: Intergovernmental Panel on Climate Change, 2023[126]

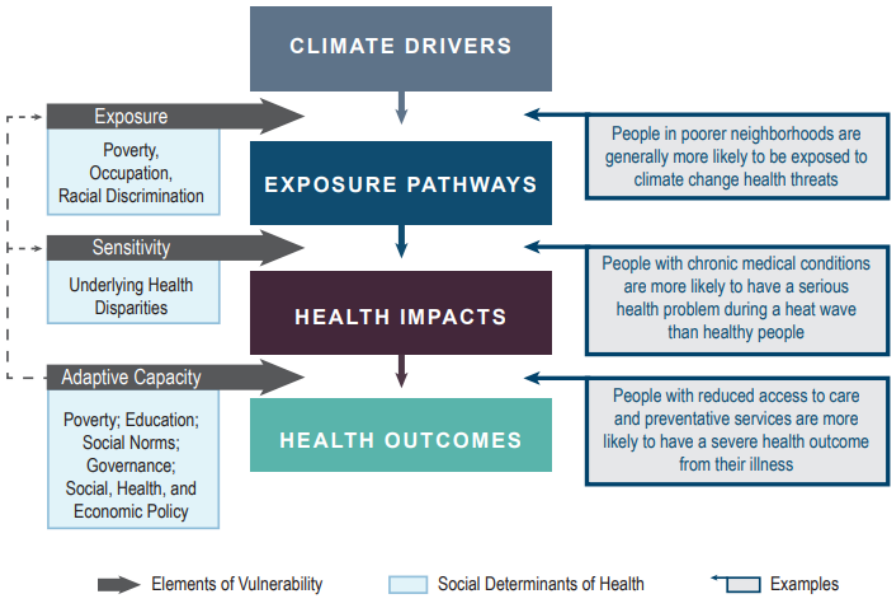
Environmental Justice and Health Equity

Certain groups of people are more vulnerable than others to health stressors from climate-related events like extreme heat, floods, poor air quality, and other similar events. These groups include children, pregnant people, older adults, people with disabilities, and people with chronic medical conditions.[127]

Unjust policies and practices, including historic underinvestment, systemic racism, marginalization, discrimination, and environmental injustice, have resulted in some communities experiencing climate impacts worse than others.[127,128] Some BIPOC communities or low-wealth communities may live in areas that have been historically redlined or faced structural exclusion, areas with outdated or aging infrastructure, and/or areas disproportionately burdened by pollution or climate exposures (environmental justice communities).[129–131] Low income and BIPOC communities often bear an unfair burden of exposure to pollution and climate impacts, yet have contributed the least to greenhouse gas emissions.[116] Historically, major transportation projects have often contributed to environmental injustices and health inequities in low income and BIPOC neighborhoods.[132(pp346-347)] Some social factors, like income, can impact access to resources to adapt to climate change (e.g., ability to afford or access air conditioning, indoor air filters, or flood/disaster insurance).[129,133] BIPOC communities may already experience stressors that influence health, and climate change adds another stressor and threat to health.[134]

People and communities may experience overlapping vulnerabilities that impact health risks from climate change (Figure 14). For example, outdoor workers with asthma or another respiratory condition may be more sensitive and exposed to wildfire smoke than other groups.[131] Children who live in a neighborhood with less trees or greenspace may be more vulnerable to heat compared to adults and those living in more shaded areas.

Figure 14. Overview and examples of how the Social Determinants of Health can impact vulnerability to climate change



Source: Gamble et al., 2016 [116]

In the IBR project area, the average prevalence of high blood pressure and diabetes are slightly higher compared to Clark and Multnomah counties overall (Table 5).[23] A higher percentage of people living below 200% poverty (33%) live in the project area compared to Clark and Multnomah counties overall (Table 4). According to the literature, people with low income may be more burdened by climate change health impacts.[127,135] Additionally, groups particularly susceptible to climate-related hazards represent a notable proportion of the population living in the project area. These include older adults (18%), people with disabilities (20%), people who are unemployed (5.3%), and people without health insurance (7.4%) (Tables 3, 4).[23] Climate change can negatively impact the health of socially vulnerable groups, and Figure 5 displays several socially vulnerable census tracts in the IBR project area compared to the rest of the region.[135] Similarly, the DSEIS states the program focus area includes six schools, six assisted living facilities, and five healthcare facilities. Similar to air pollution impacts, these institutions may include people who are particularly susceptible to climate-related health impacts.

Heat

Literature Review

Extreme heat poses a significant threat to public health and safety, and is the leading cause of weather-related injury and death in the United States.[136] Exposure to heat can result in heat-related illness (including heat cramps, heat exhaustion, and heat stroke), mental health impacts, adverse perinatal outcomes, cardiovascular failure, and death.[119,137–139] High temperatures, heat early in the season, long periods of excess heat (heat waves), and high nighttime temperatures (lack of overnight cooling) are particularly hazardous for public health.[140–142]

The National Integrated Heat Health Information System defines “urban heat islands” as the phenomenon that cities get much hotter compared to rural or vegetated landscapes, due to buildings, unshaded roads, and other paved areas gaining heat during the day and emitting heat into the surrounding air.[143] Therefore, people who live in cities are more likely at risk of heat compared to rural and suburban communities.[144] Within cities, heat exposure and related health impacts may vary by neighborhood. This is due to an inequitable distribution of trees and greenspaces, where some areas may have more heat-absorbing buildings and pavements than other surrounding neighborhoods.[144] Historic redlining and systemic underinvestment may be contributing factors to the inequities in exposure to heat in certain neighborhoods, where a higher percentage of BIPOC communities and low-wealth communities may live.[116,144] Additional equity considerations around heat islands include access to cooling centers, inadequate housing conditions, and a higher cost burden of air conditioning bills.[116,144]

Local Context

Figure 15 displays tree canopy cover around the project area in Clark and Multnomah counties. The IBR Project area has less tree canopy cover (16%) compared to Clark (24%) and Multnomah (25%) counties overall.[145] Tree canopy cover can provide shade and cooling to surfaces, so it is one measure that can be used as a potential estimation of heat exposure.

Figure 15. Tree Canopy Cover in Region and IBR Study Area

From 2016-2022, there were 112 heat-related deaths in the Portland metropolitan area (including Washington, Clackamas, Multnomah, and Clark counties).[146,147] In 2021, the year of the Pacific Northwest heat dome event, the region experienced the highest number of recorded heat-related deaths.

Potential Project Impacts

Analyses included in the DSEIS *Climate Change Technical Report* projects average temperatures and number of extremely hot days will increase during the construction of the bridge and project lifetime.[123(p4-5-4-6)] The report notes infrastructure design considerations "should withstand regular air temperatures well over 100° F" to avoid disruptions to transportation.[123(p4-6)]

The IBR Program may influence exposure to urban heat. There are several opportunities to reduce and mitigate exposure to heat for bridge workers and community members alike—and prevent heat-related illness and death throughout the program's design, construction, and operation. The DSEIS *Climate Change Technical Report* includes information about specific measures to provide shade and cooling for bridge users, especially for pedestrians and bicyclists.[123(p4-6)] To mitigate the urban heat island effect, the program and local agencies could increase greenspace and tree canopy cover and reduce the amount of paved surfaces in areas surrounding bridge.[123(p3-4)] The *Report* specifies monitoring stations along active transportation facilities that track heat to alert bridge users of its safety.[123(p7-4)] The *Report* cites occupational safety rules from Oregon Occupational Safety and Health Administration and Washington Labor & Industries to protect workers from the negative health outcomes of heat exposure.[123(p4-6)]

Environmental Justice and Health Equity

While heat can affect everyone, some communities are more sensitive to heat, may be more exposed, or may have less access to resources to cope with heat. A 2018 study in Portland found that Black, Native Hawaiian or Pacific Islander, Hispanic, and youth populations were most exposed to urban heat.[148] Older adults, infants and children, pregnant people, and people with existing health conditions or who take certain medications may be more sensitive to heat and more at risk for heat-related illness.[149–151] Some communities may be more exposed to heat due to social or structural factors, like where you live or work, including low-wealth communities, people living unsheltered or unhoused, people living in urban heat islands, people without access to air conditioning, people who exercise outdoors, and outdoor workers.[120,152]. According to a 2018 report on climate risks in Washington State, among construction workers "heat related illness is most common among roofing construction and highway/bridge construction workers."[129(pp40-41)]

Wildfire Smoke and Ozone Pollution

Literature Review

Wildfire smoke especially threatens public health in the Pacific Northwest. Wildfire smoke contains several air pollutants, including fine particulate matter ($PM_{2.5}$) that can penetrate deep into the lungs and bloodstream.[153] Exposure to wildfire smoke can cause and exacerbate respiratory, cardiovascular, and neurological diseases, mental health impacts, as well as other impacts to the skin, gut, kidneys, eyes, nose, and liver.[154–156] Wildfire smoke exposure in pregnancy is associated with increased risk of adverse birth outcomes, including preterm birth and lower birth weight in some studies.[153,157] Wildfire smoke exposure has also been linked to premature death.[158]

Ozone is an air pollutant with documented health effects, and higher temperatures increase the production of ozone at ground-level. Ground-level ozone in the air can cause health effects such as sore throat, coughing and breathing problems, susceptibility to infections, and exacerbate existing conditions like asthma, emphysema, and chronic bronchitis.[159]

Local Context

In recent decades, the western United States has experienced an increase in the frequency and severity of wildfires, and associated wildfire smoke.[160] In the last decade, there have been several severe wildfire smoke events impacting the region. The Washington State Department of Ecology identified Vancouver as one of sixteen overburdened communities in Washington highly impacted by air pollution, specifically high levels of $PM_{2.5}$.[50] The Portland-Vancouver metropolitan area also experiences high ozone levels, especially on hotter days.

Ten percent of adults in the IBR project area have asthma (Table 5).[23] Asthma prevalence is similar in Clark and Multnomah counties overall.[23] While there may be several factors contributing to asthma and other chronic respiratory conditions, asthma is an important health outcome as people with asthma may be more impacted by poor air quality.

Potential Project Impacts

The DSEIS *Climate Change Technical Repor*t notes the region will "see an increase in severe smoke events" in the future.[123(p4-9)] Severe smoke events could impact bridge construction and use, including impacts to visibility and exposure to air pollution among bridge workers, pedestrians, bicyclists, transit users, and community members.

There are several opportunities for the IBR Program to mitigate exposure and protect public health during smoky conditions and poor air quality, including provision of training and protective equipment for workers, reducing construction or transportation pollution during severe smoke or ozone events, and planning for smoke-related disruptions for active transportation users, such as intermittent closures or detours. The DSEIS *Climate Change Technical Report* cites state rules to protect workers during smoky conditions.[123(p4-9)] The Program should consider cumulative effects of air pollution when planning for high wildfire smoke or ozone days.

Environmental Justice and Health Equity

People with existing health conditions (such as asthma, Chronic Obstructive Pulmonary Disease (COPD), diabetes, chronic kidney disease, or heart disease), older adults, pregnant people, infants, and children are especially at risk of air quality-related health outcomes.[155,158,161] Outdoor workers, including those working in construction, transportation, or agriculture, are particularly at risk of wildfire smoke exposure and long periods of air pollution.[153,162] Nationally, low-income populations and BIPOC communities are overburdened by air pollution.[153] Racism in housing, including historic redlining, housing segregation, and neighborhood disinvestment, has contributed to inequities in exposure to air pollution.[153] Further disparities around air pollution exposure may persist due to inequitable access to air conditioning and air filtration in homes and schools in low-income neighborhoods and BIPOC communities.[153]

Severe Weather and Flooding

Literature Review

Severe weather, including snow, ice, or windstorms, flooding, and thunderstorms can impact health directly, as well as disrupt infrastructure vital to health and wellbeing (such as electricity, transportation, healthcare, safe water, and sanitation). Winter storms can cause injury and increased risks of falls, hypothermia, frostbite, mental health impacts, and death.[163] Flooding can cause immediate risks to human health, such as injury and death. Flooded waters can be contaminated and lead to human illness.[163–166] Flooding may also pose risks to human health through disruption of critical services (e.g., roads, transportation, drinking water) and disrupt wastewater infrastructure.

Local Context

Human-induced climate change has altered weather patterns and increased the frequency and intensity of extreme weather events. Future trends in weather events, particularly precipitation predictions, are uncertain. However, there is some evidence that extreme precipitation and flooding event will increase due to climate change.[167,168] A general upward trend in precipitation should be expected in the Lower Columbia River Basin, with additional risk for winter atmospheric river flooding.[169]

Impacts of severe winter weather on health outcomes can include increased falls and cold-related illnesses. In January 2024, emergency department visits for falls, cold-related illness and other health impacts increased during a severe winter weather event in the region.[170]

Potential Project Impacts

Severe storms or weather events could impact transportation and create barriers to access essential services in the region, such as healthcare. Bridge design should account for severe weather and flooding to minimize the impact of future events. The *DSEIS Climate Change Technical Report* provides an estimation of precipitation intensity and floodplains. However, the *Technical Report* may use outdated data sources and underestimate the future flood risk in the area, translating into greater vulnerability to health risks for bridge users and nearby communities.

The DSEIS *Climate Change Technical Report* notes a predicted increase in the intensity of precipitation during winter months and less snowpack across the Columbia River Basin. The cited model is current and consistent with other precipitation models in scientific literature.[171] Stormwater and flood management will be especially important to mitigate the effects of excess precipitation.

The Annual Exceedance Probability (AEP) is a statistical measure used to describe the probability of a specific event occurring in any given year. This statistic is often used to describe the probability of a severe flood. For example, floods with an AEP of 1% are often referred to as a “100-year flood”, or a flood with a 100-year recurrence interval. These estimates are updated regularly to adjust for changing climate and weather patterns.

The *DSEIS Climate Change Technical Report* provides 100-year recurrence interval floodplains mapped by FEMA corresponding to the immediate vicinity of the project area.[123(p6-6)] FEMA flood profiles are measured by FEMA flood insurance studies (FIS). The most recent FEMA FIS for Vancouver, Washington and Portland, Oregon references United States Army Corps of Engineers (USACE) studies from the 1970s.[172]

However, the USACE recently updated their AEPs for the Lower Columbia River Basin in 2022. In their report, the authors note that the FEMA effective flood profiles may not stay aligned with updates from the USACE. Furthermore, USACE estimates a higher water surface elevation corresponding to a 100-year flood than estimated by the annual FEMA effective FIS at the I-5 Bridge.[172(p72)]

The *DSEIS Climate Change Technical Report* does not specify the FEMA FIS year in their presented floodplains map and notes that "more of the study area will be subject to flood risk in the coming century". Still, the map may not accurately represent the region currently at-risk of damage due to a 100-year flood and requires further review.
See more in the Water Quality section.

Environmental Justice and Health Equity

Children, older adults, and people with compromised immune systems are more at risk of the health impacts of contaminated water.[165,173] Systemic underinvestment and outdated water system infrastructure in low-income communities can disproportionately expose these communities to unsafe water.[165] People with disabilities may face barriers to access risk communications or resources during severe weather events or climate hazards. Some people with disabilities may require ongoing medical care, which puts this population at risk during climate events that overwhelm the healthcare system or result in power outages.[174] People with limited English proficiency may face language barriers that restrict access to healthcare, social services, and risk communications.[135]

Mental Health and Climate Change

Literature Review

The impacts of climate change on mental health are a growing area of research. Severe weather and disasters can have immediate mental health impacts from trauma, loss of livelihood and displacement, such as shock, post-traumatic stress disorder (PTSD), and compounded stress and anxiety.[42,116] A 2021 scoping literature review by Charlson et al. found that many climate-related hazards were "associated with psychological distress, worsened mental health, and higher mortality among people with pre-existing mental health conditions, increased psychiatric hospitalizations, and heightened suicide rates".[139] While more gradual exposures to climate change (including increased temperatures, changes in weather patterns, etc.) and mental health impacts are less researched, chronic mental health impacts may include depression, anxiety, suicide, substance abuse, violence, and loss of personal and community belonging.[42] Further, sense of loss of environmental landmarks and place, impacts to plant and animal species, and other environmental effects may increase feelings of hopelessness, fear, and depression.[42,175]

Local Context

In the project area, an estimated 14% of adults reported poor recent mental health (Table 5).[23] The prevalence of reported poor mental health is comparable in Clark and Multnomah counties overall.[23] While these estimates are not specific to climate change, the current landscape of mental health in the region is consequential as climate change can disproportionately impact those with existing mental health conditions and/or contribute to new stressors and mental health impacts.

Potential Project Impacts

As previously stated, the DSEIS projects changes to climate across bridge construction and operation. The DSEIS *Climate Change Technical Report* did not include information about climate change impacts on mental health.

The IBR Program has the opportunity to influence climate change impact, community connectedness, safety, transportation, healthcare access (including access to mental health services), and the built environment through the project. All of these determinants can individually and cumulatively affect mental health.

Environmental Justice and Health Equity

Climate change impacts the natural environment, posing threats to mental, spiritual, and cultural health, wellbeing, and traditional practices among Tribal and Indigenous communities.[42,116,139,176] Climate change may exacerbate the impacts of intergenerational trauma and health inequities as a result of systemic racism and settler colonialism.[42,116,139] People with existing mental health conditions may be more impacted by trauma and distress from climate-related hazards or events.[42,139] Youth may be more at risk of climate-related mental health impacts, and are likely to experience more cumulative effects of climate on mental health in their lifetimes.[42,139,175]

Social Determinants of Health

The World Health Organization defines social determinants of health as “the non-medical factors that influence health outcomes” and estimates that between 30-55% of health outcomes are dependent on these determinants.[177] The term broadly encompasses social and environmental conditions – or the conditions in which people are “born, grow, live, work, and age”. This often includes neighborhood conditions, but also spans social factors like housing, education, and occupation. These systems affect health in complex and overlapping ways, often determining access to health-promoting resources. They also shape the level of stress someone experiences. Long term stress for social or environmental causes, like poverty or racism, activates biological systems that lead to inflammation, hormonal dysregulation, and chronic disease.[178]

In this analysis, we review housing and displacement, income and employment, access to greenspace, and Indigenous social determinants of health. It is important to note that transportation access is also a social determinant of health. Discussion of transportation access is in the *Transportation and Active Transportation* section.

Housing and Displacement

Literature Review

Housing influences health through four primary pathways: quality, affordability, stability, and location. Homes that are free of molds/pests and have essential amenities and thermal control promote good health. Housing that is located near healthy food options, parks, living wage jobs, and transit support access to health promoting opportunities and needs.[179] Affordability and stability are linked to health via stress. Expensive housing that leaves less budget for other needs, and the fear of losing housing, can lead to constant stress and cortisol release. Chronic stress contributes towards poorer mental health outcomes, reduced immune system function, metabolic and cardiovascular outcomes, and mortality.[180] Housing loss through foreclosure and gentrification-related displacement are associated with poorer well-being outcomes, including depression, anxiety, and self-reported health.[179,181]

Local Context

The IBR study area intersects with 14 neighborhoods in Clark and Multnomah County (ten and four respectively).

There are an estimated 1,366 people across the whole houselessness spectrum in Clark County, and an estimated 11,153 in Multnomah County.[182,183] Data on houseless community members is difficult to collect and maintain over time. Estimates included in Table 11 below come from the *DSEIS Equity Technical Report* and county point in time counts. Houseless residents are distributed throughout the IBR study area. The *DSEIS Equity Technical Report* Table 5-2 cites estimates that 349 houseless residents reside in Multnomah County in Inner Northeast Portland and North Portland, and 625 houseless residents in Clark County.[82(p5-5)]. These estimates come from point in time counts conducted in 2022 and are outdated, are likely undercounts, and do not delineate the full spectrum of people experiencing housing instability that reside in emergency or transitional shelters. There are two safe rest villages within the study area in North Portland (Sunderland RV park and N Portland Rd (in development)).

Table 11. Housing demographics in IBR Study Area, Clark County, and Multnomah County. Sources: ACS 5-Year Estimates 2018-2022[+75], CDC EJI [^23], DSEIS Equity Technical Report*[82], Clark County Point in Time Count[++182], City of Portland/Multnomah County Joint Office of Homeless Services Audit Report[^^183]

Mode	IBR Study Area	Clark County	Multnomah County
Total Housing Units[+]	12,651	196,557	317,308
Percentage who Rent[^]	52%	33%	43%
Percentage of Renters who are Paying at Least 30% of Household Income on Rent in the Past 12 Months[+]	50.1%	48.4%	48.9%
Percentage of Homeowners with Mortgage who are Paying at Least 30% of Income on Mortgage Payments in the past 12 Months[+]	23.3%	25.7%	30.1%
Houseless Populations	974 (2022)*	1,366 (2023)[++]	11,153 (2024)^^

Potential Project Impacts

The *DSEIS Environmental Justice Technical Report* Table 4-4 states the Modified LPA will displace people living in 43 residences through property acquisition.[98(p4-17)] The *DSEIS Equity Technical Report* details that the Modified LPA would displace 32 floating homes in North Portland Harbor.[82] On the south shore of North Portland Harbor, the Modified LPA would displace three floating homes and one residential unit on land. In Clark County, the Modified LPA would displace seven residences and include partial acquisition of 10 residential parcels for permanent right-of-way. The design option that shifts I-5 west would displace 33 residential units of the Normandy Apartments in the Esther Short neighborhood (*DSEIS Equity Technical Report*, Table 5-1).[82(p5-2)] These displacements could affect resident mental health by causing stress and anxiety regarding moving, disrupt existing social networks, and increase the distance to employment or regular essential services.

The DSEIS notes the IBR Program will follow the requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act (URA), a federal law that establishes minimum standards of support for persons displaced through property acquisition due to a federal project. The URA goals include providing relocation assistance and ensuring displaced individuals find decent, safe, and sanitary housing. For residential displacements, the IBR Program must provide relocation advisory services to displaced owners and tenants, give 3 months advance notice of property possession, and cover costs for moving and added costs of rent or purchase of comparable replacement housing.

Construction of the Modified LPA may cause the displacement of encampments in the area. Forced relocation can cause several harms of houseless community members, including the loss of personal belongings and needed medical items, displacement into more hazardous conditions, and disruption of community networks and social supports.[184] The *DSEIS Equity Technical Report* states understanding the full impact of the Modified LPA on the houseless community will require in-depth outreach with service providers and notes the IBR Program will coordinate with these organizations to offer services to unsheltered people that are directly affected by construction.[82(p5-5)]

Environmental Justice and Health Equity

The DSEIS states that acquisitions will cause displacement in the Esther Short, East Colombia, and Rose Village neighborhoods, high priority EJ areas. This could affect community cohesion and access to community resources and services. The analysis balances these impacts with non-specific improvements in transit access, reliability, and connectivity for all communities.

Aspects of the gentrification process like increased housing costs, sociocultural erasure, and transformation of available amenities affect physical and mental health, and create inequities between racial and class groups.[185] The *DSEIS Environmental Justice Technical Report* states that the Modified LPA could catalyze increases in property values and rents in affected areas. These increases in financial burden from rent and property taxes could create additional stress and worsen mental health.[186]

Income and Employment

Literature Review

Employment can introduce several health-promoting and health-negating factors into a worker's daily life that vary widely by sector and occupation. The cumulative net effects of employment contribute toward overall life and health span.[187] Income is the most strongly associated aspect of employment related to improved health outcomes and life expectancy, usually granting access to better medical care, housing opportunities, food security and other health-promoting basic needs.[188,189] Stability in job status protects mental health, while insecurity leads to stress, cortisol release, and associated health impacts.[190] Long commutes place time limits on workers. More time commuting typically means less physical activity, less time to prepare food at food, and less time to sleep.[191]

Local Context

A majority of workers that cross the I-5 bridge are Clark County residents commuting into Oregon (79%). The employment rate of the IBR study area is similar to Clark and Multnomah Counties overall (Table 12). Employment in the construction sector is slightly higher in the project area than the percentages in the surrounding counties. Life expectancy in the IBR program area ranges from 75 to 79. This is in the middle-to-lower ranges among life expectancy in Clark and Multnomah counties overall (Figure 4).

Table 12. Income and Employment Demographics in IBR Study Area, Clark County, and Multnomah County, ACS 5-Year Estimates 2018-2022

Mode	IBR Study Area	Clark County	Multnomah County
Employment Rate	95.4%	94.8%	94.5%
% Employment in Construction Industry	10.1%	9.2%	5.1%

Potential Project Impacts

The total program cost for the IBR Program is an estimated $6 billion. An investment of this size is expected to stimulate economic activity. The IBR Program estimates construction will drive $3.6 billion in net new economic activity and 13,460 new person-year jobs (one person working full time for a year). The program has committed to a 15% Disadvantaged Business Enterprise participation goal, will incorporate DBE best practices throughout program implementation, and will develop a DBE and capacity-building strategy to support economic opportunities for workers of color, workers with disabilities, and young workers.

Between 32-35 businesses and 600-742 employees are projected to be impacted due to property acquisitions required for construction. Table 13 outlines effects on businesses and employees. A majority of businesses impacted are in Multnomah County, but a greater share of workers employed in Clark County are projected to be affected. The *DSEIS Economics Technical Report* also notes additional businesses that remain may be affected as well if they find it difficult to attract or maintain customers either during the construction period or that traveled to the area for the original grouping of businesses that no longer remains.[192] Mitigations noted include a phased construction schedule to minimize business access impacts, as well as business outreach to identify additional supports for construction-related issues. The IBR Program must also comply with URA requirements for nonresidential displacements, which include provision of relocation advisory services, 3 months advance notice before land possession, and covering costs for moving and reestablishment expenses.

Table 13. Expected Business Displacements and Affected Employees, DSEIS Economics Technical Report[192]

Area	# of Businesses Displaced	# of Employees Affected	Notes
Oregon Mainland	7	41	Primarily marine-related light industrial and commercial-retail
Hayden Island	15	159	Primarily food service and retail that serves the island
Downtown Vancouver	10-13	400-542	Primarily commercial office and retail, larger range considers impact of I-5 Mainline Westward Shift option

The *DSEIS Economics Technical Report* states a potential concern related to business displacement is the need for employees to find new jobs.[192] This disruption in job stability could affect worker mental health. If these employees end up with longer commutes, they may have less time for health-promoting activities like sleep, healthy food preparation, or physical activity.

Environmental Justice and Health Equity

Communities that have greater income inequality tend to have poorer health outcomes.[193] There is a strong association between depression and income inequality, which disproportionately impacts women and people of color.[194] Upward economic mobility influence health and well-being. Economic mobility prospects matter for health and well-being. In the United States, incremental increases in early intergenerational upward mobility are associated with incremental decreases in mortality, with the greatest magnitude occurring for Black men.[195]

BIPOC community members, women, people with disabilities, LGBTQ+ groups, and single-parent households are more likely to experience poverty and face more barriers in finding and maintaining employment. In the region, people experiencing economic instability cite several conflating and intersectional barriers to stability, including housing instability, financial burden of medical care, discrimination, mental health concerns, individualist 'bootstrap' culture, inability to secure stable jobs with living wages, lack of insurance benefits, and limited advancement opportunities.[78]

The *DSEIS Environmental Justice Report* states that implementation of the Modified LPA would displace 10 businesses in the Esther Short neighborhood and 3 businesses in the Rockwood neighborhood (high-priority low-income neighborhoods), and no specific benefits to low-income or minority populations are projected. It also notes that the loss of service industry jobs on Hayden Island may disproportionately impact low-income and workers of color. The analysis states this loss is balanced by the non-specific jobs and economic development opportunities the project will bring for all communities. However, Modified LPA-induced changes in transit access to jobs is expected to have larger benefits for white, non-Hispanic residents in the study are than BIPOC residents, immigrants and refugees, and people under the age of 25.

Greenspace

Literature Review

Access to greenspace has been shown to have a positive impact on the health and mental health of both individuals and communities.[196,197] Some of the physical health benefits include decreases in cortisol, risk of diabetes, risk of preterm birth, in rates of hypertension, asthma, heart disease, and all-cause mortality.[197] Greenspace has also been linked to increases in physical activity. Studies have even compared the impact of walks in different urban environments and found that a walk on an urban road with trees resulted in significant decreases in tension, fatigue, and anxiety.[196] At the community level, greenspaces have been shown to increase social interaction and decrease social isolation, to improve air quality, reduce noise impacts, and reduce urban heat island effects.[197]

Access to greenspace has not been available to individuals and communities equally. “Most studies reveal that the distribution of such space often disproportionately benefits predominantly White and more affluent communities,” and this is “increasingly recognized as an environmental justice issue”.[198] While the benefits of access to greenspace have been shown over many studies, increasing greenspaces without seeing the larger context can create a paradox that may negate some positive impacts. Increases in greenspace can lead to increased housing costs that could "lead to gentrification and displacement of the very residents the greenspace strategies were designed to benefit”.[198]

Potential Project Impacts

The Modified LPA will change the connection to the Columbia River Renaissance Trail by making it both safer and wider.[199(p4-10)] This could have a positive health impact by increasing safety and connectivity to parks and trails. Other trail improvements included in the Modified LPA include: “improved intersections, sidewalks, and bike lanes” connected to the Discovery Historic Loop Trail, and an improved shared-use path through Old Apple Tree Park.[199(p4)] The Modified LPA includes “improved bicycle pedestrian, highway, and transit access” to parks in Portland and Vancouver “which could make access to parks easier”.[199(p6-1)] Increased access to parks and greenspace would have a positive impact on individual and community health.

The DSEIS indicates that noise levels could increase throughout many parks in the project area closest to the bridge and highway including East Delta Park, Fort Vancouver National Historic Site, Marshall Community Center, the Leupke Senior Center, Marshall Park, Clark County Recreation Fields, Leverich Community Park, Burnt Bridge Creek Trail, Kiggins Bowl Sports Fields and Stadium (IBR Parks and Recreation Technical Report). It also indicates that noise could decrease in the Lower Columbia River Water Trail, Lewis and Clark National Historic Trail, Vancouver Waterfront Park, Old Apple Tree Park, Arnada Neighborhood Park.[199]

See Noise Section for more information about health impacts of noise.

Indigenous Social Determinants of Health

Carroll et al. 2022 define Indigenous social determinants of health as "the conditions specific and unique to Indigenous communities that impact health and wellbeing".[200,201] While not a complete list, some of these conditions include: "Indigenous knowledge, language and identity, land and kinship, sovereignty, and structural and systematic factors".[200] The Seven Directions Center for Indigenous Public Health has identified these factors that contribute to the health of American Indian/Alaska Natives and acknowledges that this list may not encompass all of the important factors for all Indigenous communities.

"Indigenous communities support healthy vibrant lives embedded in their own Indigenous knowledge, values, and traditions. Even today, despite settle-colonial efforts to either wipe out or totally assimilate individuals and collectives, Indigenous nations continue to bring health and well-being to their communities and convey knowledge to future generations".[201] "Over the past 500 years, colonization weakened Indigenous systems that helped to maintain community health (e.g. traditional food systems, access to clean water, Indigenous languages, access to land) and replaced them with unsupported and underfunded systems, leading to disproportionate systemic health disparities, including some of the highest rates of diabetes, suicide, and cardiovascular diseases".[202] "Comprehensive community-driven, nation-based reclaiming and defining of Indigenous health and well-being is necessary to establish and address the broad array of determinants of health and well-being in Indigenous communities".[201]

The IBR Program poses a risk of disrupting connection to traditional cultural activities and could impact the ability to access culturally specific health care for American Indian/Alaska Natives. Many of the Cowlitz Indian Tribe's members reside outside of Washington and their access to their ancestral lands and ceremonies will be diminished and must be addressed in the planning of the project. Specifically, the impacts of tolling will increase the burden to tribal members traveling to access culturally specific healthcare, access cultural activities, and access ancestral land.

The IBR Program is engaged in tribal consultation with federally recognized tribes of Washington state and Oregon, and one tribe that is not currently a federally recognized tribe. Appendix A of the DSEIS describes the tribal consultation and process. It reiterates the commitment to government-to-government consultation with tribes and to incorporate input into decision-making processes. Our recommendations include encouragement to the IBR Program, and all partner agencies, to meaningfully engage in tribal consultation and implement input from tribes at every stage of decision-making to mitigate harm to American Indian/Alaska Native communities.

Water Quality

Literature Review

Safe and clean water is essential for the health of humans, animals, and the entire ecosystem. There are many ways that public health is concerned with clean water including sanitation, drinking water, fish and shellfish consumption, water recreation, and harmful algal blooms.

Drought is a public health concern that can impact water quantity and quality.[203,204] Decreased water flow in rivers and streams can concentrate contaminants, reduce nutrients, and lower oxygen levels – which all pose risks for water quality, aquatic life, and potentially human health.[205,206] Drought can also impact groundwater availability and aquifer recharge, which is an issue for populations reliant on water systems from groundwater.[205]

Climate change can affect water quality through warmer temperatures, changes to precipitation and severe weather, amount, timing and melting of snowpack, and availability of water.[207] Longer periods of heat and higher temperatures impact surface water temperatures of oceans, rivers, lakes, ponds, and streams. Warmer water temperatures can create more hospitable environments for harmful algae and other toxins. Some harmful algae can produce toxins and create "blooms" of cyanobacteria (harmful algal blooms, or HABs) that can make people sick when drinking, swimming, or recreating in contaminated water or eating fish that were exposed. Cyanobacteria exposure can lead to gastrointestinal illness, irritation of skin, eyes, nose, or throat, and potentially liver damage.[208]

Potential Project Impacts

The Troutdale Aquifer is designated by the United States Environmental Protection Agency as a Sole Source Aquifer and provides fresh water to the City of Vancouver. The water quality technical report notes that a "sole source aquifer report for the Modified LPA would be prepared and submitted to the EPA once the Draft SEIS is out for agency review." That information should be made available to the public to review for awareness of potential impacts and/or precautions being taken.

There is currently very little treatment of stormwater from the bridge into receiving waters. According to the *DSEIS Water Quality and Hydrology Technical Report,* the Modified LPA "includes a stormwater conveyance system" that "would reduce total suspended solids, particulates, and dissolved metals to the maximum extent possible before runoff reaches surface water or is infiltrated".[209(p4-1)] New and updated stormwater infrastructure that complies with all regulatory standards would have a positive impact on water quality.

The *DSEIS Water Quality and Hydrology Technical Report* Section 5.1.2 points out many potentials for negatively impacting water quality including contamination from equipment, groundwater contamination, contamination of surface water, turbidity in water, contamination of water due to disturbances in riverbed sediment during in-water work, and construction materials and byproducts falling into the river during construction and demolition.[194] While we appreciate that "all reasonable precautions would be taken to avoid and minimize water quality" at all stages of the project, the responsibility to protect water quality could not be more consequential.

Hazardous sediments and contaminants

Both the *DSEIS Water Quality and Hydrology Technical Report* (Section 5) and the *DSEIS Hazardous Materials Technical Report* (Section 5.3) discuss the need to sample and analyze the levels of hazardous sediments and toxic contamination.[53,209] We agree and advocate for sampling, testing, analysis, and publication of data to understand the potential contaminants and toxic material that could impact water quality during in-water construction. In our review of the DSEIS, we did not find a detailed plan for sampling and analysis of riverbed sediment prior to in-water work occurring. Our recommendations reflect the need to document and release a detailed plan to show any potential contaminants, hazardous sediment, and toxics so partners and the public can understand potential risks.

There are a number of waterways within the project area that are listed under 303(d) of the Clean Water Act for failing to meet water quality standards, including the Columbia Slough, Burnt Bridge Creek, Columbia River (including North Portland Harbor), and Fairview Creek (DSEIS Water Quality and Hydrology Chapter). Described in Table 3.14-2 of the DSEIS Water Quality and Hydrology Chapter, these waterways include pollutants such as toxics like polychlorinated biphenyls (PCBs), polycyclic aromatic hydrocarbons (PAHs), dichloro-diphenyl-trichloroethane (DDt) metabolites, vinyl chloride, and dissolved oxygen.[210] Projected impacts, if any, are not described in the DSEIS in relation to these pollutants and the potential for increased turbidity during in-water work.

Emerging contaminants

The *DSEIS Water Quality and Hydrology Technical Report* states that best management practices (BMP) have been shown to reduce many pollutants from runoff but the effectiveness of removing "polycyclic aromatic hydrocarbons (PAHs), microplastics, and constituents of emerging concern (CEC), including 6PPD-quinone, are less well known because the fate and transport of these pollutants remains unclear".[209(p3-5)]

6PPD stands for the chemical N-(1,3-dimethylbutyl)-N'-phenyl-p-phenylenediamine and is used on all kinds of tires to reduce degradation, or breaking down, which helps the tires last longer.[211]As tires drive on the road, small dust and particles come off the tires due to friction and contain 6PPD that is carried into waterways as stormwater runoff. 6PPD has been found to highly toxic to coho salmon and is killing fish before they can lay their eggs and killing juvenile salmon disrupting the lifecycle of this critical species. It is also harmful to other fish including rainbow trout and brook trout. The impacts of 6PPD on human health are still being studied.

Integrating stormwater best practices into the new bridge will help improve water quality and protect the waterway, the ecosystem, and human health. Since the understanding of these toxics, and their impact, continues to grow every day it is important for the program to actively seek out updates to best management practices from the Washington State Department of Ecology and Oregon State Department of Environmental Quality to reduce 6PPD and 6PPD-q. In 2022, directed by the Washington State legislature, the Washington State of Ecology published "6PPD in Road Runoff: Assessment and Mitigation Strategies."[212] This document suggests best management practices (BMPs) to reduce 6PPD including source control BMPs, flow control and runoff BMPs. The highest level of effectiveness of these practices would reduce 6PPD and would have a positive impact on ecosystem health.

The 10-year construction period of this project creates an opportunity to be adaptable to learning about and implementing new best management practices as the understanding of this critical issue develops.

Dust, construction and demolition
In addition to the air quality concerns posed by fugitive dust from construction and demolition, a fugitive dust plan should include assessment of dust makeup, impacts on water quality and mitigation that will be taken. The age of the current bridge brings concerns of the chemical makeup and potentially toxic materials used during the time period it was built, specifically lead and asbestos. Demolition of the current bridge over the water brings the potential for toxic fugitive dust to settle onto the Columbia River and negatively impact water quality, aquatic plant life, and animal species living in the river. There is not sufficient information in the DSEIS for analysis of the demolition plans or fugitive dust mitigation plan and how it could impact water quality.

Future water availability
The *DSEIS Climate Change Technical Report* includes "increased drought" as a regional hazard experienced currently or projected in the future.[123] The Project area may be impacted within the bridge's lifetime by drought conditions that affect water availability and water quality in the Columbia River, as well as in surrounding water bodies.

Environmental Justice and Health Equity

From our review, the DSEIS does not make a clear connection between impacts to water quality and equity priority communities. Overall, the information in the DSEIS suggests that new stormwater infrastructure in the Modified LPA would positively affect water quality, which would benefit the general population, inclusive of equity priority communities. Further, we were unable to conduct community engagement for this health analysis to gather community-based information about environmental justice and health equity concerns around potential water quality impacts. There are likely more connections between water quality, environmental justice, and health equity, particularly regarding subsistence fishing and Indigenous social determinants of health, that are important for the community and that we were unable to sufficiently assess. There is insufficient information in the DSEIS to assess potential environmental justice and health equity impacts on water quality.

Discussion

There is **sufficient evidence** in the DSEIS for the following potential health impacts of the Modified LPA:

- **Potential protective elements and positive health impacts**
    - **Transportation and active transportation:** The extension of light rail services and addition of enhanced pedestrian and bike facilities will likely increase physical activity and improve health. Expanding design and policy decisions that encourage people to walk, roll, bike, or use transit, rather than drive, would increase health benefits.
    - **Access**: Bringing the bridge, and auxiliary connections, up to or exceeding standards under the Americans with Disabilities Act (ADA) would improve access for all. Using inclusive or universal design, which centers around older adults, people with disabilities, and children, would increase benefits.
    - **Heat**: Providing shade and cooling for bridge users, especially active transportation users, could provide protection from heat-related health outcomes.
    - **Employment:** The project would drive a temporary increase in construction-related employment. Increased access to light rail and transit services could increase access to jobs and other essential services. Increasing contracting for Disadvantaged Business Enterprises, Minority Business Enterprises, Women Business Enterprises, and Small Business Enterprises would increase equitable distribution of these benefits.
    - **Access**: The Modified LPA includes plans to expand connections between active transportation networks, trails, and parks. Increased access to greenspace would have a positive impact on health.
    - **Water quality**: Improvements to stormwater infrastructure would have positive health impacts on water quality, and the health of the ecosystem.
    - **Safety:** Replacement of the existing I-5 bridge will result in a structure with greater seismic resilience, minimize the risk of a bridge collapse during an earthquake, and support safety, regional travel, and access to essential services.

- **Potential harmful elements and negative health impacts**
    - **Air quality:** Given the existing high traffic volumes along the I-5 interstate bridge, people who live nearby are subjected to greater concentrations of air toxics and are at risk of experiencing additional air quality burdens. The DSEIS estimates a 33% increase in VMT under the Modified LPA by 2045 and increase in freight traffic volumes, which could increase particulate matter and negatively impact air quality.
    - **Transportation and active transportation:** Transit access to jobs for BIPOC residents, immigrants and refugees, and people under the age of 25 did not increase as much as it did for white, non-Hispanic residents. This indicates disparities would continue to remain, likely reinforcing disparities in opportunities for physical activity.
    - **Tolling**: Tolling would have a disproportionate impact on low-income community members and could negatively impact access to essential services like health care and culturally specific health care.

- **Access**: Construction delays on roads, delays to bus routes and light rail service, and closures of sidewalks and active transportation paths may negatively impact access to homes, jobs, schools, health care facilities, and other essential destinations. These impacts may be greater for those that do not have car access.
- **Noise**: The Modified LPA would approach or exceed noise abatement criteria at 65 locations in Portland and 135 locations in Vancouver, including Discovery Middle School. Children and their learning comprehension are particularly affected by noise. The DSEIS describes higher levels of noise and vibration will negatively and disproportionately impact communities identified as equity priority communities.
- **Displacement**: The IBR Program will acquire land displacing 43 homes and could also displace houseless residents in the project area. Between 32-35 businesses and 600-742 employees could be impacted due to property acquisitions. Equity priority communities of East Columbia, Rockwood, Esther Short, and Rose Village would be disproportionately impacted.
- **Access**: The IBR Program could negatively impact access to traditional cultural activities, culturally specific health care, and access to ancestral lands for American Indian and Alaska Native communities.

There is **insufficient evidence** for several topic areas to determine potential health impacts of the Modified LPA.

- **Climate change and health:** The DSEIS anticipates the Modified LPA will reduce greenhouse gas emissions (GHG) compared to the No-Build Alternative. Construction of the Modified LPA will produce GHG emissions. Several climate-related hazards are projected to impact the region throughout the construction and operation of the Interstate Bridge, including heat, wildfire smoke, severe weather and flooding. The health effects of climate change are not equally distributed, and several communities are disproportionately affected by climate change - including IBR Equity Priority communities. More information is needed about how the Program will mitigate climate change impacts to Equity Priority Communities and what protective elements for health and climate justice will be included in final design and construction plans.
- **Air quality:** Due to the large geographic area used to conduct the air quality analysis, and the statement in the DSEIS that localized health impacts due to air quality cannot be reliably quantified, more information is needed to reliably assess air quality impacts. This is the basis of our recommendation for air quality monitoring and further air quality assessment, including dispersion modeling. Air dispersion modeling incorporates data appropriate for analyzing potential health impacts on a local scale.
- **Road safety:** The DSEIS states that crashes will increase by 15% under the Modified LPA, mainly due to estimated increases in traffic volumes. The DSEIS does not provide clear information on how crash frequency would change by travel mode, crash type, severity, location, or for environmental justice communities. There is insufficient evidence in the DSEIS to conclude to what degree severe injury and fatalities would be reduced for active transportation users.
- **Fugitive dust**: There is insufficient information about mitigation plans for fugitive dust during construction and how that could impact air quality and water quality.
- **Water quality**: There is insufficient information in the DSEIS regarding a plan to sample and analyze hazardous sediments and toxic contamination prior to in-water work.

Addressing the gap of insufficient information

As identified above, there are a number of places throughout the DSEIS where there is insufficient information to determine health impacts. There are also many decisions to be made for the final EIS, design decisions, and local decisions that could change the assessment of the project having either a positive, negative, or neutral impact to health. At this stage, we are only able to comment on the current proposal, but want to note the potential for changes throughout the design and construction phases of this project.

A project of this scale is composed of large-scale decisions that on their face could be beneficial for health, such as improvements to active transportation. However, implementation of these decisions and plans has the potential to tip the scales one way or the other toward improving or harming health. To continue the example of expanded active transportation, if bike and pedestrian paths are implemented in a way that makes those paths safe, accessible, connected to essential services, and free from exposure to pollution and noise, then they could have a positive health impact. If they are implemented in a way where there are no sight lines from vehicles, budgets for active transportation are cut to prioritize lanes of vehicle traffic, and there is high exposure to noise and traffic pollution, then they could have a negative health impact.

There is opportunity at every stage of this project to prioritize the health and safety of the citizens of Washington, Oregon, and anyone using the bridge. That is why our recommendations fall under the general categories of designing with health in mind and constructing with health in mind, so that the program can prioritize sustainability and health throughout the lifetime of the project. In addition to our recommendations, we propose that the IBR Program adopt a “health in all policies” approach into their decision-making.

Addressing Environmental Justice and Health Equity

Through program policy and implementation, the IBR Program has the opportunity to make positive changes and take action toward equity in affected communities. The decisions that could positively impact health in a community can also provide other co-benefits that further equity and environmental justice. For example, since communities of color experience a stronger urban heat island effect, program decisions that increase tree canopy cover could provide multiple benefits including reducing the urban heat island effect, improving air quality, positively impacting ecological health, improving access to active transportation with increased shade cover, and improving mental health benefits.

When weighing design and policy decisions, a health in all policies approach allows the decision to be evaluated for potential co-benefits of each decision. Decisions that increase environmental justice and health equity should be prioritized due to the co-benefits of improving community and ecological health.

There are many places throughout the DSEIS where the Program notes disproportionate impacts to equity priority communities. While mitigation of harm is the most important, it is also the minimum that the project could strive for. Every instance of disproportionate impact is the roadmap to show where increased benefits could be concentrated.

Health in all policies approach + Meaningful community engagement and tribal consultation
This health analysis and our recommendations reflect the importance of a health in all policies approach through this and upcoming stages of decision making. “Health in all policies is a collaborative approach to improving the health of all people by incorporating health considerations into decision-making across sectors and policy areas”.[213] Health in all policies is a framework, while health impact assessments are the tool, but both have a shared goal of presenting evidence-based health information to decision-makers.

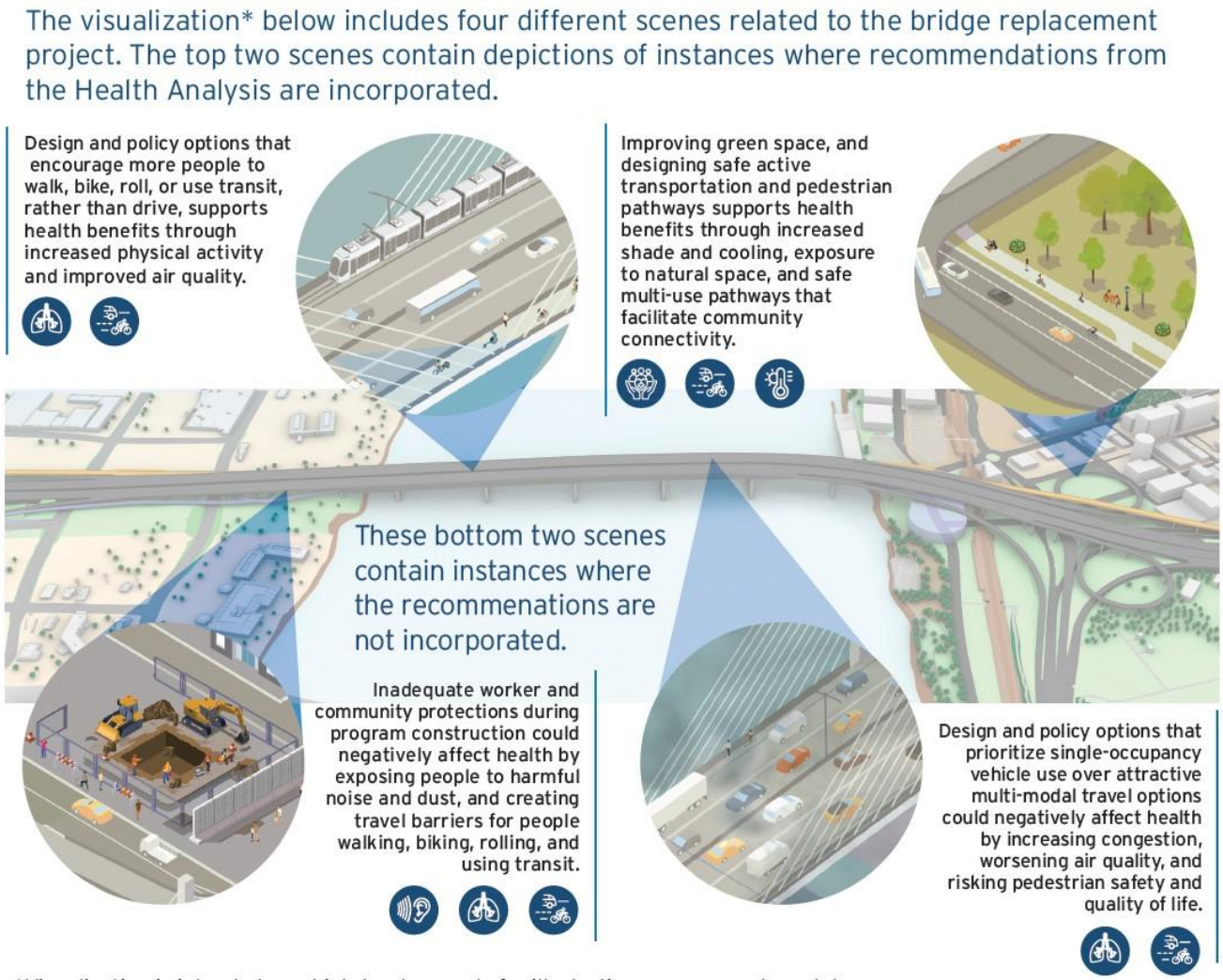
As described previously, individual and community health are made up of intersecting influences such as the built environment, current and historical disparities, and cumulative impacts of these many factors. To fully realize health equity, the public health system needs to be integrated with other systems that impact health, such as transportation. This approach allows for opportunities for collaboration to solve complex problems, identify and work toward shared goals across agencies and projects, and de-silo efforts to allow for more innovative and efficient use of resources.[214]

The IBR Program has an extraordinary opportunity to adopt a health in all policies approach throughout the design and construction phases of the project so that the lifetime impact of this project is positive. We are ready to continue to support the important work to ensure the equitable distribution of the transportation, economic, ecological, disaster resilience, and other benefits of replacing the Interstate Bridge between Washington and Oregon.

Our recommendations reflect the shared public health values of health equity, environmental justice, and ecological health. Each recommendation touches on one or more of our topic themes of air quality, transportation and active transportation, climate change and health, noise, social determinants of health, and water quality. Under each general recommendation there are more specific and tangible recommendations for implementation.

We appreciate any and all feedback from the IBR Program about our assessment. We also look forward to a detailed response about which recommendations the program plans to adopt, and how they will implement them.

Figure 16: Visualization of potential cumulative effects of implementing recommendations of the Health Analysis



**Visualization is intended as a high-level example for illustration purposes only and does not reflect property impacts or indicate that decisions on design options have been made. River crossing graphic adapted with permission from the IBR Program.*

Recommendations

To reduce negative health impacts of the IBR Program, we recommend decision-makers design, construct, and maintain a program that prioritizes human health and safety, ecological health, and environmental justice.

Our recommendations are organized in four themes:

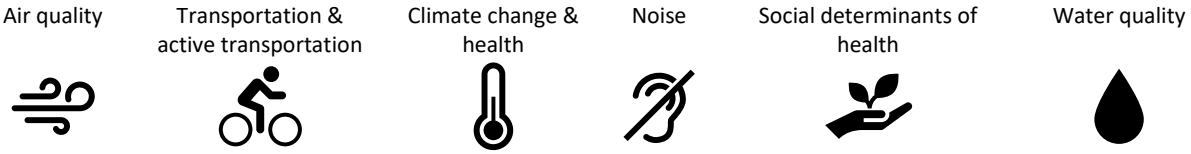
- Prioritize sustainability, transparency, communication and health for the lifetime of the project (p. 79-80)
- Provide additional information and modeling to better understand potential health impacts (p. 81)
- Design with health and equity in mind (p. 82-86)
- Construct with health and equity in mind (p. 87-89)

Our recommendations are guided by the following principles:[101]

1. Equitably reduce environmental exposures. Reducing environmental exposures in one area should not come at the expense of increased environmental exposures in another area.
2. Promote interventions to reduce environmental exposures, improve health, equitably distribute benefits, and monitor impacts on health outcomes.
3. Coordinate approaches to control environmental health risks across sectors.
4. Inform and involve communities that are affected by changes in environmental exposures.

Recommendations were developed and informed by peer-reviewed literature, best practices from previous health impact assessments on similar transportation infrastructure projects, and potential health impacts and mitigation identified during assessment of the DSEIS and other identified sources.

An icon or multiple icons accompany each recommendation. The icons indicate which topic area and associated health outcomes could be improved by implementation of the recommendation.



Prioritize sustainability, transparency, communication and health for the lifetime of the project

Transparency is central to building and maintaining trust. Community members will be affected by the IBR Program. It is critical that community members are both able to access information about how the program will affect them and able to share information, complaints, or questions with the program about how the program is affecting them.

The following recommendations support transparent communication and prioritize health during the lifetime of the program:

1. **Institute accessible systems for real-time two-way communication about project design and construction impacts to keep community members informed of project impacts, and the program informed of community impacts.**
    a. All communications materials should be written in plain language, available in multiple languages, and compatible with assistive technologies.
    b. With implementing agencies and contractors, coordinate a communication plan with multiple accessible platforms (e.g., website, social media, email and physical newsletters, text alerts, hotline) that are updated in real time so that the community can know when and where construction is happening; expected changes to transit, driving, or pedestrian routes; potential environmental impacts; and who to contact with questions, comments, or concerns.
        i. This should include notifying specific audiences with construction schedules well in advance: 1) emergency responders so they can be prepared during an emergency; 2) pedestrians and cyclists to know when it is safe to traverse portions of the road or access detours; and 3) affected residents, businesses, and commercial properties.
        ii. Communicate with community members and affected residents on types, time, duration, and potential health effects of construction well before and throughout construction activity. This should include details about noise, air quality, transportation and active transportation impacts.
        iii. Develop and maintain a centralized hotline and website for complaints, questions, or issues during and after construction. This should include coordinating with agencies responsible for controlling environmental exposures (e.g., noise, dust) during planning and construction and when responding to complaints.
        iv. Use visual technology such as 3D models and QR codes placed around the project area to help with visual understanding of design and construction plans.

2. **Prioritize health in program policies and decision-making throughout the lifetime of the program by incorporating regular engagement with community members, health department staff, and Tribal governments.**
    a. Provide funding to maintain health analysis team to continue to track and identify opportunities to include public health recommendations into the project. This can include:
        i. Incorporating health department staff into ongoing design committees or advisory councils
        ii. Proactive engagement and communication between program staff and public health to identify decision points and opportunities for health-focused decision-making well in advance
    b. Develop a monitoring, evaluation and reporting plan with clear responsibilities and accountability for the lifetime of the program. This should cover:
        i. Health, health equity, environmental justice and environmental indicators affected by the project, including health topics identified in this assessment and other topics that community and Tribal partners identify
        ii. Agencies responsible for measuring those indicators
        iii. Summaries of community complaints or comments and actions taken by the program or partner agencies to address them
        iv. Monitoring and timely reporting of any project-related issues that are context- and location-specific to support rapid response and reduce additional issues, including:
            1. Any injuries that are work related, transportation related, or non-workers injured in the project areas
            2. Any project-related noise, dust, emissions, or other environmental exposure disturbances
    c. Both before tolls go into effect, and after tolls are operational, ODOT and WSDOT should maintain a toll equity accountability committee or establish another structure where equity voices are at the table in a consistent, transparent, and resourced way to ensure long term accountability.
        i. Implement best practices from the Equity and Mobility Advisory Committee recommendations to the Oregon Transportation Commission.[215]

Provide additional information and modeling to better understand potential health impacts

Developing and sharing enhanced assessments of estimated impacts of the IBR Program on residents, people passing through and near the project area, and workers will increase the opportunity for incorporation of tailored strategies that more adequately protect health at the individual, project, and systems levels.

3. **Compile and release to the public more information about demolition plans for the current bridge infrastructure, including potential air quality, noise, and water quality impacts. This could include:**
    a. A detailed noise assessment and mitigation plan with noise heat mapping, predicted noise levels, and any overlap in noise-emitting activities with construction (e.g., if demolition and new construction are happening at the same time).
    b. Details about materials in existing infrastructure that could release contaminants into the air upon demolition, including lead and asbestos, and a detailed mitigation/abatement plan.
    c. Details about materials in existing infrastructure and the riverbed that could release sediments and contaminants into the water upon demolition, and a detailed mitigation/abatement plan.

4. **Expand information about potential air quality, safety, and connectivity impacts of design and construction.**
    a. Include air dispersion modeling of potential impacts of construction-related traffic diversion through neighborhoods adjacent to the project area.
    b. Include analysis of potential disruptions to regular transit, road, and active transportation routes that may affect community members' access to workplaces, health care services, social services, and other community services.
    c. Include analysis of severe injury and fatalities reduction for active transportation users and detail about mitigation features to prevent injury and fatalities.
    d. Collect and include pedestrian and bicycle counts from days where environmental threats (i.e., wildfire smoke) are not influencing travel behavior.

5. **Compile and release to the public additional information about potential air quality, safety, and connectivity impacts of tolling-related traffic diversion through neighborhoods.**

6. **Develop and release to the public a detailed sampling and analysis plan of riverbed sediment including potential contaminants, hazardous sediments, and toxics.**

Design with health and equity in mind

Design decisions early on are an important opportunity to make upstream, preventive health interventions that support healthier communities. Intentional planning with an environmental justice lens provides the opportunity to not only prevent disproportionate harms from design, but to address past harms and current disparities through infrastructure investments. Designing the IBR Program area with health at the forefront will be more beneficial to the community for decades to come.

The following recommendations prioritize health through program design:

7. **Design active transportation (bike lanes, sidewalks, and multi-use trails) and public transportation that is accessible to all to improve air quality and physical activity.**
    a. Design decisions should prioritize transportation system designs that reduce vehicle miles traveled, reduce single-occupancy vehicle capacity, increase physical activity, and increase access to transit.
    b. The design team should make considerations to include light rail station investment and design that encourage walkability and accessibility in surrounding areas. They should account for increased utilization, and opportunities for shade and cooling to protect users from heat.[216]
    c. Sidewalk and active transportation design should be centered around older adults, people with disabilities, and people with children, also known as inclusive design or universal design.

8. **Design safety features to reduce injury for active transportation users and vehicle users.**
    a. Design should prioritize pedestrian safety and active transportation user safety by integrating design features to reduce vehicle speeds. The design team should use a safe systems and health impact pyramid lens to evaluate ongoing transportation infrastructure decisions to reduce risk to all users.[84,85]
    b. Create active transportation spaces that feel safe and increase visibility. Use signage, lighting and lane markings on shared use paths to reduce the risk of bicycle-pedestrian, vehicle-pedestrian, and vehicle-bicycle collisions.
    c. Design and install suicide barriers that are tall and unclimbable. Install appropriate multilingual signage displaying the 988 National Suicide Prevention and Mental Health Crisis Hotline as required by Washington RCW 39.04.420.[217]

9. **Improve greenspace and tree canopy cover to improve air and water quality, provide shade, and increase natural spaces.**
    a. Use green infrastructure to improve air quality, infiltrate stormwater, increase climate resilience, improve habitat for wildlife, and increase physical activity.[218]
    b. Use landscaping materials throughout the project area, along sidewalks, roadways, trails, shared use paths, and at transit stops to soften the concrete footprint and reduce the urban heat island effect.
        i. Use native drought- and pest-resistant vegetation to support climate resilience and local biodiversity.
    c. Coordinate with the City of Portland and City of Vancouver to meet or exceed local tree canopy cover goals of 28%-33% in the project area, reduce the urban heat island effect, create shade, and reduce potential erosion into surface water.[219,220]
        i. Reduce removal of existing trees, vegetation and greenspace, and include provision of tree canopy, vegetation, and/or bridge shade structures to create shaded area for respite from heat and sun exposure.[221,222]
    d. Reduce large expanses of pavement and impervious surfaces to limit stormwater runoff and reduce urban heat island effect.

10. **Design with sustainable materials and standards to reduce greenhouse gas emissions.**
    a. Follow sustainability guidelines outlined in local government jurisdictions' sustainability and climate action plans to reduce the effects of climate change on health. The IBR Program should score highly in quantifiable sustainable practices associated with roadway design and construction.[221]
        i. For example, following the Greenroads Rating System, the IBR should score 80 points or higher.[223]
    b. Develop and implement a preferred scenario that meets or surpasses the greenhouse gas emissions reduction target set for the region to reduce the effects of climate change on health. Refer to local cities, counties and state climate action plans and requirements regarding greenhouse gas emissions, where applicable.[224–226]

11. **Prioritize resilience to extreme weather events, climate change, and seismic events to improve safety.**
    a. Develop spaces, pathways, and other facilities built to withstand extreme weather events and changes in climate (e.g., heat waves, wind and ice storms, flooding, sea level rise and storm surge, extreme rainfall) to adapt to climate change, and to prevent injury, illness, and death from extreme weather.[123,222]
        i. This includes design that makes it easier and quicker to clear ice, snow, and other extreme precipitation from pathways.

12. **Maintain and improve good air and water quality in the project area to protect physical and mental health.**
    a. Use innovative storm water management practices along the corridor to sustainably reduce vehicle pollution from entering waterways to prevent water contamination and waterborne illness.[221]
        i. Plan for more severe and frequent storms/precipitation to limit increases in stormwater runoff.
        ii. Reduce exposure of vehicle runoff infiltrating the water system.
        iii. Treat stormwater runoff from all areas impacted by the IBR Program.
    b. Maintain wetland water quality and protect/repair nearby wetlands.
    c. Follow all federal, tribal, state, territorial, and local requirements around water quality to protect aquatic life, local wildlife ecosystems and prevent water- and foodborne illness.
    d. Use innovative design features to improve air quality for active transportation users along the corridor. This could include planting vegetation between shared use paths to improve air quality and provide additional protection from vehicles.
    e. Follow all federal, tribal, state, territorial, and local requirements to protect and improve air quality.
    f. Protect and honor Native water rights by contributing to a healthy river and healthy ecosystem because “the ability to exercise these treaty rights to fish is completely dependent upon clean water and healthy ecosystems”.[227]

13. **Minimize noise in the project area to protect nearby neighbors and populations disproportionately affected by noise.**
    a. Re-examine mitigation measures for the 65 locations in the Portland project area and 135 locations in the Vancouver project area that will exceed noise standards under the Modified LPA as a way of protecting the health of residents in these areas.
        i. Re-examine mitigation measures for Discovery Middle School. Children and their learning comprehension are particularly affected by noise. If project design is unable to reduce noise exceedances for Discovery Middle School, work with Discovery Middle School to implement appropriate sound insulation as per ODOT and WSDOT noise mitigation considerations (e.g., ventilation systems, storm windows, air conditioning).
    b. Use multiple methods (e.g. freeway lids, noise walls, quieter pavement, landscaping) to reduce noise in the project area for the lifespan of the project and for all bridge users (pedestrians, cyclists, local businesses, residents).
        i. Design sound walls, and other noise reduction strategies, should prioritize the reduction in noise and be sure not to result in additional problems like disruptions of sidewalks and trails, barriers to community connectivity, or creating large concrete structures.
    c. Help residents implement noise reduction strategies before construction begins: identify and work with highly affected residents to determine mitigation during construction, such as installing double pane or sound- and dust-proof windows, installing air conditioning, sealing doors and windows, and reinsulating walls and ceilings; and providing hotel vouchers during the noisiest/overnight operations if certain noise levels are exceeded.[228]
        i. Consider lessons from the Port of Seattle Sound Insulation Repair and Replacement Pilot Program assessment (expected in 2025) as a potential model for a residential noise insulation program by a major transportation infrastructure project/port.[229]

14. **Improve connectivity and community cohesion to promote access to community and essential services.**
    a. To support reductions in racial health disparities, prioritize active transportation and transit connections to important destinations to support place-based physical activity, especially destinations identified by BIPOC communities.[230]
    b. Maintain access and, where possible, increase connectivity to key neighborhood services and assets by promoting street connectivity and walkability.[74] These include parks, schools, worksites, libraries, grocery stores, food pantries, restaurants, banks, social clubs, gas stations, laundromats, post offices, places of worship, harvesting and fishing sites, cultural and natural landmarks, hospitals and healthcare facilities, including behavioral health and substance misuse treatment facilities.
    c. Create activity-friendly routes (i.e., pedestrian, bicycle, or public transit access) that allows for multiple and convenient route options to everyday destinations by walking, biking, and rolling.[74]
    d. Use design elements (e.g. freeway lids, pedestrian bridges) to improve East/West connectivity and accessibility within the program area.
    e. Incorporate design elements that highlight local art, history, and culture, including naming the bridge, to enhance community connection.

15. **Center equity and focus on local businesses in contracting to improve economic opportunities for underrepresented groups.**
    a. Identify and commit to a plan for increasing the contracting opportunities for Disadvantaged Business Enterprises, Minority Business Enterprises, Women Business Enterprises, and Small Business Enterprises that are awarded contracts for designing, building, and operating the program.[215]
    b. Consider abiding by the Washington State Healthy Environment for All Act that establishes a "goal of directing 40 percent of grants and expenditures that create environmental benefits to vulnerable populations and overburdened communities".[231(p1)]

16. **Minimize home and business loss, and proactively support displaced residents, businesses, and employees.**
    a. Before property acquisition and displacement begins, develop and implement comprehensive strategies and funding options to address the relocation and housing needs of people displaced by the program, including housed and unhoused community members. These should build on and provide a holistic approach to Uniform Relocation Assistance and Real Property Acquisition Policies Act (URA) requirements and the objective to lessen the emotional and financial impact of displacement. This could include:
        i. Ensuring continued access to local and culturally important food, transportation, health care, and social services to displaced people and families.
        ii. Evaluating the feasibility of 'Right to Return' options for displaced residents, either in continued housing relocation assistance or in new housing options if any are developed using project funds.
        iii. Working with families and neighbors to assist with coordinated relocation for those that are interested, and to maintain community linkages because moving can be particularly difficult for children and older adults.
        iv. Working with families to relocate within their child's school district, and if possible, moving over the summer as not to disrupt school year learning.
        v. Working with organizations like the Council for the Homeless and Columbia River Mental Health to develop strategies and investments to support the movement of people experiencing homelessness within the project area into housing and avoid further stress, traumatization, and distrust of government. Partner with homeless service providers to conduct outreach and to identify accommodation and support strategies to assist people in finding permanent housing options.[232]
        vi. Assisting displaced residents to find housing options for rent or purchase within the project area that meet their accessibility needs, health and safety needs, and are sustainable. This includes that homes are LEED certified, lead abated, and remediated for mold; have heat pumps, screened windows, air filters, ventilation; and are pet-friendly for individuals and families with pets.
    b. Identify strategies to reduce business impacts like business and employee displacement. This could include assistance and support to displaced employees in the job search, and displaced businesses in searching for new properties that meet their needs.
    c. Identify strategies to provide mental health and other support services to individuals who will be displaced from their home or disconnected from their social network due to residential or business displacement, at no cost to the individual.

Construct with health and equity in mind

Construction is expected to take approximately a decade. It is important to center worker and community health in construction plans, contracts, and operations.

The following recommendations prioritize health during the multi-year construction phase of the program:

17. **Meet and exceed, where possible, state and local requirements for noise, air quality and water quality to protect the health of workers, community members, and the ecosystem.**
    a. Ensure that construction vehicles meet state and local requirements for clean diesel contracting, and retrofit diesel construction vehicles to curb air pollution prior to the start of construction.
    b. Maintain construction equipment in good working condition to reduce emissions and noise.
        i. Reduce traffic-related air pollution from combustion of fuel, tire wear and brake wear during operation of the project.
        ii. Use approved noise control devices for generators, compressors, and similar equipment. Use OHSA approved broadband back-up warning devices on all construction vehicles and equipment.
    c. Develop a workforce transportation plan with contractors (e.g., incentivize active transportation and public transit options, carpooling) to reduce expected increased single-occupancy vehicle transportation to construction sites, and to reduce noise, air pollution, and GHG emissions.
    d. Adjust the construction schedule to maximize quiet time for residents.
        i. Limit loud-noise construction activities performed within 300 meters of an occupied dwelling unit between 7:00pm and 7:00am, as reported as noise abatement time constraints in the DSEIS.
        ii. Limit the operating periods for equipment that produces loud noise, such as pile drivers and concrete cutters, particularly during nighttime periods.
    e. Measure employee noise exposures and implement a hearing loss prevention program per state and federal noise level regulations over an 8-hour shift. The recommended exposure limit is 85 dBA over an 8-hour period.
    f. Limit in-water operations to November 1 – February 28 to protect fish, wildlife, and habitat resources per Oregon Department of Fish and Wildlife and U.S. Army Corps of Engineer regulations.[233,234]

18. **Design and mark routes during construction to protect pedestrians and active transportation users from injury and environmental exposures.**
    a. Develop safe and clearly marked alternative routes and maintain temporary paths for pedestrians, bicyclists, strollers, wheelchair users, and other active transportation users during the construction period, rather than simply closing sidewalks and bike lanes.
        i. Coordinate with and incorporate adjustments for ongoing and future Safe Routes to Schools efforts and for bike bus groups used by both adults and children in the project area (for example, Bike Bus PDX[235]).
    b. Direct alternate or detour vehicle routes away from high pedestrian areas, schools, places of worship, and other community centers to decrease likelihood of vehicle-related pedestrian injury.
        i. Include speed abatement measures (ex. speed humps, temporary signals, reduced speed limit signs) to reduce potential for crashes and injury.
    c. Reduce construction hazards to motorists, pedestrians, and cyclists from hazards such as large dust and debris "kickup", concentrated air pollution, and excess noise that could lead to unsafe areas and elevated exposures.

19. **Maintain community connectivity through reliable access to transit, neighborhood services, and regular transportation routes.**
    a. Reduce obstacles to business access, local and culturally important food—including harvesting and fishing sites—transportation, health care services, schools, places of worship and other essential community services during construction.
    b. Increase transportation assistance programs during construction to reduce disruption in accessing medical care, behavioral health care, social and educational services, especially for older adults and people with disabilities. Expand those programs and financial assistance.

20. **Protect workers and community members on high-risk days for high heat and poor air quality events.**
    a. Create and implement plans for extreme heat during the construction period, including recommended or designated times for active transportation users to travel through the project area during cooler times of day to prevent heat-related illness and death.
    b. Utilizing Washington State Department of Health guidance, take steps to reduce construction-related air pollution on days when the Air Quality Index reaches 'Unhealthy for Sensitive Groups' due to wildfire smoke or high ozone to protect outdoor workers and communities at increased risk.[236] WADOH guidance available at https://doh.wa.gov/sites/default/files/2024-06/821-174.pdf.
    c. Create and implement plans to ensure worker safety and protection, accounting for overlapping exposures, health sensitivities, and disproportionate impact to outdoor workers, including easy and reliable access to personal protective equipment.[152,162]
        i. Ensure that workers understand their rights, have adequate access, and have training to take protective steps with respect to climate hazards, such as extreme heat and severe weather, wildfire smoke, and air pollution exposure. These include access to water, shade or cooling, breaks, bathroom facilities, and personal protective equipment.[237,238]

21. **Establish systems for continuous monitoring for noise and air quality during and after program construction, ensuring that pre-construction conditions are measured as a baseline.**
    a. Use the World Health Organization's most recent Air Quality Guidelines and the Oregon Air Toxics Benchmarks to track air quality indicators near the project area and in neighboring communities.
    b. Coordinate with Washington State Department of Ecology, Oregon Department of Environmental Quality, Southwest Clean Air Agency, and community members to install and regularly analyze data from air quality monitors in the project area. This may include funding installation and maintenance of air quality monitors in the project area.
    c. In line with recommendation 1 above, identify a point of contact and appropriate communication methods for community members to use if they have questions or complaints about noise or air quality.
    d. Coordinate with schools, early learning facilities, and childcare facilities to install noise and particulate matter monitors at sensitive locations in the program area. Expand collection of noise measurements to include schools and early learning facilities near the program area beyond but inclusive of Discovery Middle School.

22. **Implement workforce development and support programs to develop and retain a diverse workforce.**
    a. In accordance with the recommendations of the IBR Workforce Market Study, develop comprehensive workforce development programs, including higher education, internships, apprenticeships, and targeted training in high-paid trades, with a focus on increasing BIPOC, underrepresented, underserved community participation and preparing students in high schools and community colleges for construction and trade jobs.[239]
    b. Prioritize services and policies for working families and caregivers, including childcare, and access to breast and chest feeding and pumping space.

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Appendix A

Additional Details on Methods

1. IBR Program data sources
    a. The working group reviewed select draft technical reports and chapters from the draft DSEIS prepared in February 2024 and then cross-checked with DSEIS documents published in September 2024, including:
        i. Acquisitions Technical Report
        ii. Air Quality Technical Report
        iii. Climate Change Technical Report
        iv. Climate Change Chapter 3.19
        v. Economics Technical Report
        vi. Energy Technical Report
        vii. Environmental Justice Technical Report
        viii. Equity Technical Report
        ix. Hazardous Materials Technical Report
        x. Neighborhoods and Populations Technical Report
        xi. Noise and Vibration Technical Report
        xii. Parks and Recreation Technical Report
        xiii. Transportation Technical Report and Appendices
        xiv. Transportation Chapter 3.1
        xv. Water Quality and Hydrology Technical Report
        xvi. Water Quality and Hydrology Chapter 3.14
        xvii. Wetlands and Other Waters Technical Report
    b. The working group consulted with writers of the DSEIS technical reports to ask questions and clarify technical information.
2. Baseline conditions & health pathways
    a. Methods:
        i. Literature review of meta-analyses & systematic reviews of topic indicators (exposures) and associated health outcomes
        ii. Description of baseline health conditions using comparable local data (state/regional or national as backup to comparable local data option)
            1. CDC EJI
            2. ACS Census
            3. CDC SVI
            4. CDC PLACES
            5. Additional data sources (sources listed in text)
3. Environmental justice & health equity
    a. Methods:
        i. Describe any known environmental justice and health equity topics addressed in the literature review and as they relate to information in the DSEIS
        ii. Describe EJ and health equity details using national mapping data (CDC EJI, additional data sources)
4. Recommendations
    a. Determined by assessment findings
    b. Review of existing HIAs conducted on transportation infrastructure projects of similar scope

i. SR 520 Health Impact Assessment: Puget Sound Clean Air Agency, Public Health Seattle & King County. *SR 520 Health Impact Assessment*.; 2008. https://drive.google.com/file/d/1UWSOxTsFcgLTTR1lBmjr-PPTZEGJ0Rnj/view?usp=sharing&usp=embed_facebook
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iii. Bhat M, Clapp E. *The Sellwood Bridge Project: A Health Impact Assessment*. Multnomah County Health Department; 2011. https://www.pewtrusts.org/~/media/assets/2011/01/sellwood_bridge_hia_1_21_11.pdf
iv. City of Cincinnati Health Department. *Interstate 75 Focus Area Study Health Impact Assessment*.; 2010. https://www.cincinnati-oh.gov/sites/health/assets/File/I75FocusAreaHIA.pdf
v. Goff N, Bhat M, Johnson S. *Columbia River Crossing Health Impact Assessment*.; 2008. https://www.pewtrusts.org/~/media/Assets/2008/06/HIAReport15ColumbiaRiverCrossing.pdf

c. Recommended by phases of project:
i. Program design
ii. Contracting & construction (up to 10 years)
iii. Program lifetime (50-100 years)

IBR Draft SEIS - RECORD #2493 DETAIL

First Name :	Jessica
Last Name :	Roberts
Attachments :	VPS_to_IBRP_Original.pdf (266 kb)

VANCOUVER PUBLIC SCHOOLS

VPS

Each Student, Every Day.

Program Administrator Greg Johnson
Interstate Bridge Replacement Program
500 Broadway St, Ste 200
Vancouver, WA 98660

November 15, 2024

RE: Draft SEIS Public Comment

Dear Program Administrator Johnson:

On behalf of Vancouver Public Schools we offer our support for plans outlined in the Draft Supplemental EIS regarding replacing the I-5 bridge and improving its five-mile influence area.

As one of the largest employers in Clark County, we are in support of improvements that support the large number of employee commuters who need safe and effective infrastructure to make it to work each day. Effective traffic flow as well as accessible and efficient public transportation between the Portland Metro and Vancouver, WA is key to supporting our employees and students and the balance they must strike between their family and home, school and work obligations and commitments.

Despite a very tight geographic configuration within a built environment, we support the comprehensive multi-modal program design that would accommodate an additional 66,000 person-trips and 32,000 vehicle-trips through the corridor each day by 2045, while reducing accidents and backups. The proposal makes improvements by adding safety shoulders, a dedicated public transit lane, active transportation and auxiliary merge lanes. It also makes river navigation safer and protects ecosystems through modern stormwater management.

We recommend pursuing a single-level fixed-span configuration with two auxiliary lanes, allowing for an overall more gradual grade and no traffic-stopping liftspan which brings obvious improvements to congestion, accident reduction and climate.

Vancouver Public Schools
2901 Falk Road • Vancouver, WA 98661
PO Box 8937 • Vancouver, WA 98668-8937
Phone: 360-313-1000 • Fax: 360-313-1001 • www.vansd.org

VANCOUVER PUBLIC SCHOOLS
VPS
Each Student, Every Day.

We prefer the following:

- A second auxiliary lane wherever possible.
- Mitigation to support displaced or disrupted business during and after construction.
- A local user fee rate that reflects existing tax burdens shouldered by commuters, freight and commerce, and is reduced or eliminated after construction bonds are paid.
- Consideration for workforce housing.
- Retention of C Street ramps for secondary access to downtown Vancouver.
- Commencing construction as soon as possible, given rising construction costs.

We appreciate the efforts of all involved in planning, design and funding of this critical transportation facility expected to last a century.

Sincerely,

Jeff Snell
Superintendent, Vancouver Public Schools

Vancouver Public Schools
2901 Falk Road • Vancouver, WA 98661
PO Box 8937 • Vancouver, WA 98668-8937
Phone: 360-313-1000 • Fax: 360-313-1001 • www.vansd.org

IBR Draft SEIS - RECORD #2494 DETAIL

First Name :	Mark
Last Name :	Wheeler
Attachments :	DSEIS-2494_Wheeler_Original.pdf (6 kb)

IBR Draft SEIS - RECORD #2494 DETAIL

Submission Date : 11/15/2024
First Name : Mark
Last Name : Wheeler
Business/Organization/Agency :

Submission Input :

First Name:
Mark

Last Name:
Wheeler

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
This project should prioritize modes of transportation that are not personal cars. It should include high quality, pleasant bike & walking facilities so people actually want to bike & walk across the bridge. It should include light rail so people use that to commute across the bridge.

JCA comment #: 435

IBR Draft SEIS - RECORD #2495 DETAIL

First Name :	Joseph
Last Name :	Santos-Lyons
Attachments :	DSEIS-2495_SantosLyons_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #2495 DETAIL

Submission Date : 11/15/2024
First Name : Joseph
Last Name : Santos-Lyons
Business/Organization/Agency :

Submission Input :

First Name:
Joseph

Last Name:
Santos-Lyons

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Induced Demand

Comment:
I urge planners to prioritize future-proofing our transit infrastructure to meet long-term capacity needs. Stations should be designed to accommodate four-car trains now, aligning with potential future upgrades to the downtown transit tunnel. Additionally, we must plan for higher-capacity transit systems, such as multi-lane Bus Rapid Transit (BRT) or even heavy rail, to ensure flexibility and scalability well beyond the 2045 Environmental Impact Statement (EIS) horizon.

Finally, I encourage incorporating induced demand considerations into traffic modeling. Accurately accounting for how new infrastructure influences travel behavior is essential for realistic projections of transit and road use.

Thank you for considering these critical points as we shape a resilient and adaptable transit future.

JCA comment #: 434

IBR Draft SEIS - RECORD #2496 DETAIL

First Name :	David
Last Name :	Lewis
Attachments :	DSEIS-2496_Lewis_Original.pdf (6 kb)

IBR Draft SEIS - RECORD #2496 DETAIL

Submission Date : 11/15/2024
First Name : David
Last Name : Lewis
Business/Organization/Agency :

Submission Input :

First Name:
David

Last Name:
Lewis

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
I am a 76-year-old Portland resident, and I use my bicycle for most of my transportation, along with transit. I have a number of concerns about the proposed design for the I-5 bridge replacement. The fact that the design puts transit and pedestrian/bicycle traffic on opposite sides makes multimodal use far more difficult. The lack of connection to the Williams/Vancouver corridor in Portland makes it difficult to access from the dominant North/South bicycling route. And the lack of shade will make bicycling and walking across the bridge in summer

far less inviting.

JCA comment #: 433

IBR Draft SEIS - RECORD #2497 DETAIL

First Name :	Mary
Last Name :	Locke
Attachments :	DSEIS-2497_Locke_Original.pdf (6 kb)

IBR Draft SEIS - RECORD #2497 DETAIL

Submission Date : 11/15/2024
First Name : Mary
Last Name : Locke
Business/Organization/Agency :

Submission Input :

First Name:
MARY

Last Name:
LOCKE

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Air Quality

Comment:
Hello,
At present, the plans are put to the bridge nearly over the top of my family home. My parents are seniors and this is going to complicate theirs, and all others in the area, access to clean and healthy air. More lanes equals more cars and this is dangerous. I know there's some plan to put a bicycle lane in, but making it ridiculous hard to use is not going to encourage people to take their bicycles over cars. Sure, the Max is going over, but that's

not in a convenient place to get to either.
This plan, as is, is very, very dangerous and is socially and environmentally unjust. You're putting my family's health in danger. Please scale back this irresponsible plan.
Thank you,
Mary Locke

JCA comment #: 432

IBR Draft SEIS - RECORD #2498 DETAIL

First Name :	Ryan
Last Name :	Hashagen
Attachments :	DSEIS-2498_Hashagen_Original.pdf (6 kb)

IBR Draft SEIS - RECORD #2498 DETAIL

Submission Date :	11/15/2024
First Name :	Ryan
Last Name :	Hashagen
Business/Organization/Agency :	Icicle Industries

Submission Input :

First Name:
Ryan

Last Name:
Hashagen

Business or Organization:
Icicle Industries

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
I run a manufacturing business in Portland and think the current IBR project will be a climate disaster that leads

to more VMT through induced demand, encourage additional suburban sprawl in Clark County, make the new Vancouver Waterfront much less appealing, and will be a huge waste of money. Please focus on instituting congestion pricing tolling first, so that people and businesses can pay for the ability to move themselves and good quickly, when needed. Our business will be impacted by the years of construction and will see only negative results.

JCA comment #: 431

IBR Draft SEIS - RECORD #2499 DETAIL

First Name :	Chris
Last Name :	Streight
Attachments :	DSEIS-2499_Streight_Original.pdf (6 kb)

IBR Draft SEIS - RECORD #2499 DETAIL

Submission Date : 11/15/2024
First Name : Chris
Last Name : Streight
Business/Organization/Agency :

Submission Input :

First Name:
Chris

Last Name:
Streight

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
Hello,
Incorporating easy and seamless access to the bridge for pedestrians, cyclists, and other forms of human-powered travel outside of cars/trucks is paramount. It must be easy to access, safe, and be done in a way that negates the traffic noise. The I205 pedestrian/bike bridge is very safe but is a terrible experience from a noise standpoint. It is so offensive that I have opted not to ride my bike across on many occasions because of the

noise. It would be like turning up the radio inside a car to just static at 90 decibels and having to endure that for 5 minutes straight. Who would do that? No one!

This bridge needs to be a bridge for all forms of travel, not just cars and trucks.

Best regards,
Chris

JCA comment #: 430

IBR Draft SEIS - RECORD #2500 DETAIL

First Name :	Dan
Last Name :	Eisenbeis
Attachments :	DSEIS-2500_Port of Portland_Original.pdf (423 kb)

Port of Portland

November 15, 2024

IBR Program Draft SEIS
c/o Chris Regan
500 Broadway Street, Suite 200
Vancouver, WA 98660

RE: Comments on Draft Supplemental Environmental Impact Statement

Dear Mr. Regan:

The Port of Portland's (Port) mission is to build shared prosperity for the region through trade, travel, and economic development. Everything the Port does is tied to the efficient movement of people and goods – and there is no more urgent or significant improvement to our state and regional transportation system than the replacement of the functionally obsolete I-5 Bridge.

As a local partner agency, the Port supports the Modified Locally Preferred Alternative (MLPA). In the context of that support, the Port appreciates the opportunity to offer the following comments on the Draft Supplemental Environmental Impact Statement (SEIS).

Freight Mobility: Marine Drive Interchange and Hayden Island
As the front door to the Rivergate Industrial District, the Marine Drive interchange is critical to the Port and our tenants. Today, this interchange is often backed up, creating unsafe queuing and delays in freight movement. The Port has previously noted that the Transportation Technical Report confirms the proposed design of the Marine Drive interchange is not expected to meet AM or PM peak hour performance standards under 2045 conditions. The Port strongly recommends additional study and alternative design options to ensure optimal freight access to and from Rivergate and the Port's marine terminals. Similarly, the Port would like additional information on how the proposed design accommodates over-dimensional freight and how freight mobility concerns will be accommodated during the estimated (up to) eight-year construction period.

Given its warehousing and light industrial land uses, Hayden Island's intersections must also be designed with freight access in mind. However, the proposed grades, vertical clearances, and turning radii appear to be a challenging configuration. The Port recommends that in the final SEIS, the IBR Program further confirm truck maneuverability between Hayden Island and points south via I-5. In particular, the system of three conceptual roundabouts must be tested for viability.

Access to PDX and I-205 Traffic Diversion During Construction and Tolling
I-205 is the primary route to and from Portland International Airport (PDX). The number of annual travelers at PDX is forecasted to grow from 18 million passengers in 2024 to over 35 million passengers in 2045. Table 4-5 in the Transportation Technical Report notes that the I-205 bridge's daily traffic will increase from 169,600 to 220,000 (No Build) or 216,000 (MLPA) in 2045.

Given these forecasts, the Port recommends providing additional information on plans to mitigate the impacts of growing traffic volumes on I-205.

Moreover, the Transportation Technical Report (Section 5.11) indicates "Diversion could occur during construction as people try to avoid pre-completion tolling or congestion from construction impacts. Depending on the origin and destination of the trip, this could increase travel times, modify the time of day a trip is made, or potentially change the route or mode that is chosen." However, there was no additional analysis of the anticipated construction diversion impacts to the I-205 Bridge. Similarly, the Transportation Technical Report (Section 4.11.3) notes "Reductions on I-5 were the result of diversion to the I-205 Glenn Jackson Bridge as well as increased transit use" but there is no specific description of the extent of the diversion. The Port recommends providing additional information on the proposed mitigation measures to minimize diversion impacts on the I-205 Bridge because of construction and tolling.

River Traffic Closures and Restrictions

The Draft SEIS indicates that restrictions on or closures to river traffic would be communicated in advance, enabling river users to accommodate their schedules, tug and barge configurations, requirements for assist tugs, shipping marine freight by other modes (e.g., truck, rail), use of different vessels with lower vertical clearance, and other options during construction activities that disrupt navigation and enable the U.S. Army Corps of Engineers (USACE) to fulfill its navigation missions. The Port encourages the IBR team to coordinate with the USACE to match river traffic closures or restrictions with annual upstream dam lock closures to limit impacts on river users. Considerations such as the annual freshet (high-water events) when navigation can be more challenging, and during the busy period following the harvest when more frequent tows are employed to move product to market, should be considered when scheduling any potential closures or restrictions.

Clarifications

The Port would like to clarify and/or correct several statements made in the Draft SEIS:

- *Section 3.2.2 Existing Conditions: "The upriver end of this section of the channel, known as the Columbia and Lower Willamette, is just downriver from the existing Interstate Bridge."*
    - The Lower Columbia River and the Lower Willamette River are separate Federal Navigation Channel projects.
- *3.2.2 Existing Conditions: "Between the Interstate Bridge and the Celilo Falls BNSF Railway Bridge 95 miles to the east, many shoreline land uses are dependent on the Columbia River. Today, the Columbia River shoreline is often identified by local jurisdictions as a resource to be leveraged for river-dependent uses such as recreational, environmental, habitat, or economical purposes than with industrial marine, water-dependent uses."*
    - The Columbia River is designated by the US Department of Transportation Maritime Administration as M-84 which is a part of their Marine Highway program – see US DOT Marine Highway M-84.

- *3.2.2 Existing Conditions: "North Portland Harbor supports marinas of floating homes and primarily noncommercial boats. North Portland Harbor does not include a designated navigation channel."*
    - The North Portland Harbor does have a Federal Navigation Channel – see USACE federal navigation channel operations and maintenance dredging.
- *3.2.2 Existing Conditions: "Farther west (downstream), large ocean-going cargo ships use North Portland Harbor to reach Port of Portland Terminal 6. However, they cannot travel farther upstream due to the depth of the waterway."*
    - The Oregon Slough (20-foot-deep channel) was authorized by the Rivers and Harbors Act of 25 July 1912. While larger cargo vessels cannot transit past the BNSF railroad bridge, smaller ocean-going capable vessels such as tugs can transit to the Diversified Marine facility located adjacent to the current I-5 bridge.

Bridge Design
Finally, regarding the bridge design, the Port supports the fixed span option.

The Port would like to reiterate its support for the MLPA as well as the importance of the Interstate Bridge Replacement project to the efficient movement of people and goods and economy of our state and region. Thank you for your consideration and the opportunity to comment.

Respectfully,

Dan Eisenbeis
Regional Affairs Manager

IBR Draft SEIS - RECORD #2501 DETAIL

First Name :	Ann
Last Name :	Scheleen
Attachments :	DSEIS-2501_Scheleen_Original.pdf (6 kb)

IBR Draft SEIS - RECORD #2501 DETAIL

Submission Date : 11/15/2024
First Name : Ann
Last Name : Scheleen
Business/Organization/Agency :

Submission Input :

First Name:
Ann

Last Name:
Scheleen

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
As a transportation cyclist, people have often shared with me that they would like to use their bicycles, but it doesn't feel safe or it's too hard to access bike paths. The access points for the proposed I-5 bridge sounds like a nightmare. It would be difficult to use a combination of transportation types and the elevation gain to access the bridge sounds formidable. At my age, I would probably need an E bike, another barrier.

JCA comment #: 429

IBR Draft SEIS - RECORD #2502 DETAIL

First Name :	Stephanie
Last Name :	Noll
Attachments :	DSEIS-2502_Noll_Original.pdf (126 kb) OregonTrailsCoalitionCommentsonDraftSEISforInterstateBridge.pdf (122 kb)

IBR Draft SEIS - RECORD #2502 DETAIL

Submission Date :	11/15/2024
First Name :	Stephanie
Last Name :	Noll
Business/Organization/Agency :	Oregon Trails Coalition
Attachments :	Oregon-Trails-Coalition-Comments-on-Draft-SEIS-for-Interstate-Bridge.pdf (122 kb)

Submission Input :

First Name:
Stephanie

Last Name:
Noll

Business or Organization:
Oregon Trails Coalition

Email:
steph.noll@oregontrailscoalition.org

Phone:
15032904569

US States:
OR

Topic Area:
Transportation

Comment:
Summary:
The Oregon Trails Coalition is primarily concerned with bridge design impacts on the safety, connectivity, accessibility, and user experience of people walking, biking, using mobility devices, and accessing transit. We are especially concerned about the bridge's impact on folks accessing existing and planned segments of the Marine Drive Path, Delta Park, Columbia Slough Path, and North Portland Greenway on the south side of the bridge and the Vancouver Waterfront Trail and the Burnt Bridge Creek Trail on the north side.
Full formatted comments attached as PDF.

Full formatted comments attached as PDF.

Attachment (maximum one):
Oregon-Trails-Coalition-Comments-on-Draft-SEIS-for-Interstate-Bridge.pdf

JCA comment #: 428

Oregon Trails Coalition Comments on Draft SEIS for Interstate Bridge

Summary:
The Oregon Trails Coalition is primarily concerned with bridge design impacts on the safety, connectivity, accessibility, and user experience of people walking, biking, using mobility devices, and accessing transit. We are especially concerned about the bridge's impact on folks accessing existing and planned segments of the Marine Drive Path, Delta Park, Columbia Slough Path, and North Portland Greenway on the south side of the bridge and the Vancouver Waterfront Trail and the Burnt Bridge Creek Trail on the north side.

1. **Trail Access and Experience for People Walking, Biking, Rolling:** If we are to meet safety and active transportation usership goals, clear, safe connections and wayfinding to the existing and planned regional trails network on both sides of the river is critical.

    a. The bridge project corridor should extend to the north to Hwy 500 and Leverich Park to provide active transportation connectivity from the Burnt River Creek Trail and neighborhoods north of Hwy 500 as well as a direct connection to the Vancouver Waterfront Path.
    b. On the south side, the project corridor should include safe, separated connections to planned segments of the Marine Drive Path (connecting to the North Portland Greenway), Delta Park, and the Columbia Slough Path.
    c. When approaching the bridge from the north, the "Vancouver Dip" is a barrier for universal access. Under the current design, people must descend to the waterfront then use a ½ mile long, 4.5% grade circular facility to climb up to the bridge before crossing the Columbia River. This is an extreme example of out of direction travel that is exacerbated by out of elevation travel. The program needs to include a multiuse path at the bridge's grade from Evergreen to the river front so that walkers/ rollers/ riders have direct access to the bridge.
    d. A related and significant problem is the elevation barrier into the multiuse path, especially at the Vancouver waterfront. Under current design, in order to access the multiuse bridge path, users must climb/descend a ½ mile circular ramp at 4.5% grade. This is a significant barrier and is ableist in design. If the elevation of the multiuse path crossing the Columbia River cannot be lowered, then elevators need to be made available for active transportation users.

e. There should be robust and consistent wayfinding signage and pavement markings to connect folks to trails, active transportation facilities, and transit stops on both sides of the bridge.
f. The active transportation and transit facilities are on opposite sides of the bridge. As a result, there is additional out of direction travel for people making trips that combine transit and walking/rolling/biking.
g. **We strongly encourage more study of design options that put transit and active transportation facilities together for increased access, safety, comfort, emergency response, and user options.**

2. **Safety, Comfort, and Equitable Access** If we are to meet or exceed active transportation usership goals, the system must be designed to be welcoming of those who are eight to eighty years old —by ensuring seamless, accessible pathways without extra distance or difficult grades. By integrating open views, rest areas, and close transit access, the bridge can become a safe, enjoyable route for all.
    a. Noise, dirt, and debris: Active transportation users need protection from road noise, dirt, and vehicle debris.
    b. Grade and Distance: Current designs require significant out of direction travel both in terms of distance and grade for active transportation users while single occupancy vehicle travel experiences little to no out of direction travel.
    c. Due to the long span of the bridge without the benefit of tree canopy, there should be provisions for shading the multi-use path as the number of days regional heat advisories continue to increase.
    d. Open views to appreciate nature: Positioning the active transportation facilities in a way to access views of nature can reduce stress and increase comfort, thus encouraging more users.
    e. If two-level bridge, prevent rain (and other liquid) runoff onto multi-use path
    f. Personal Safety - Bridge connections should adequately separate people walking, biking, and rolling from motor vehicles and bridge and approach pathways should include adequate lighting.
    g. Emergency Access -
        i. Medical and police vehicles must be able to directly access multi-use path. Lack of embedded rail ties prevent ambulances and emergency responders to directly support those using the multi-use path.
        ii. If emergency responders are expected to access multi-use path by parking on highway shoulder and scaling divider, we are concerned there is not sufficient separation between automobiles traveling at highway speeds and active transportation modes.

3. ***Operations & Maintenance of Active Transportation System***
    a. Active transportation paths must have a long term financial plan for clearing the right of way of debris, glass, trash, snow and ice, etc.
    b. The bridge maintenance and operations plan should include clearing active transportation routes and pathways on bridge and all along approaches

4. **Environmental and Climate Impact** We want a climate-resilient bridge that supports active and public transportation, reducing reliance on cars and cutting emissions long-term. An environmentally friendly design promotes cleaner, healthier spaces, with natural buffers and materials that help protect public health and the environment.
    a. As heat increases in the region, the need for climate-resilience/mitigation is necessary. This includes protection from the sun through natural and/or manmade shade.
    b. Reducing single occupancy vehicle miles traveled will reduce air particulate pollution.
    c. Modeshift to transit and active transportation also:
        i. Reduces noise pollution
        ii. Reduces the impacts of water runoff, including chemical, oil, tire particulate and brake particulate runoff
    d. Global impacts: The proposed design does little to reduce auto travel, estimating a 62% increase in study-area VMT over current amounts (Executive Summary, S-21). Shifting modeshare to active transportation and transit is the most effective method of reducing VMT and meeting specific state/regional climate goals.

About the Oregon Trails Coalition

The Oregon Trails Coalition advisory council includes representatives from more than thirty federal, state, and local agencies, trail user groups, outdoor industry and tourism partners, and volunteer organizations. We represent walkers, bikers, runners, paddlers, equestrians, adaptive equipment users, skiers, snowmobilers, and motorized trail enthusiasts.

We envision a statewide network of sustainable trails that: connect Oregonians of all backgrounds and abilities to the outdoors, build a culture of environmental and cultural stewardship and healthy recreation, provide an off-street network for traveling within and between Oregon communities, and attract a wide range of users that contribute to Oregon’s urban and rural economies.

Oregon Trails Coalition Comments on Draft SEIS for Interstate Bridge

Summary:
The Oregon Trails Coalition is primarily concerned with bridge design impacts on the safety, connectivity, accessibility, and user experience of people walking, biking, using mobility devices, and accessing transit. We are especially concerned about the bridge's impact on folks accessing existing and planned segments of the Marine Drive Path, Delta Park, Columbia Slough Path, and North Portland Greenway on the south side of the bridge and the Vancouver Waterfront Trail and the Burnt Bridge Creek Trail on the north side.

1. **Trail Access and Experience for People Walking, Biking, Rolling:** If we are to meet safety and active transportation usership goals, clear, safe connections and wayfinding to the existing and planned regional trails network on both sides of the river is critical.

    a. The bridge project corridor should extend to the north to Hwy 500 and Leverich Park to provide active transportation connectivity from the Burnt River Creek Trail and neighborhoods north of Hwy 500 as well as a direct connection to the Vancouver Waterfront Path.
    b. On the south side, the project corridor should include safe, separated connections to planned segments of the Marine Drive Path (connecting to the North Portland Greenway), Delta Park, and the Columbia Slough Path.
    c. When approaching the bridge from the north, the "Vancouver Dip" is a barrier for universal access. Under the current design, people must descend to the waterfront then use a ½ mile long, 4.5% grade circular facility to climb up to the bridge before crossing the Columbia River. This is an extreme example of out of direction travel that is exacerbated by out of elevation travel. The program needs to include a multiuse path at the bridge's grade from Evergreen to the river front so that walkers/ rollers/ riders have direct access to the bridge.
    d. A related and significant problem is the elevation barrier into the multiuse path, especially at the Vancouver waterfront. Under current design, in order to access the multiuse bridge path, users must climb/descend a ½ mile circular ramp at 4.5% grade. This is a significant barrier and is ableist in design. If the elevation of the multiuse path crossing the Columbia River cannot be lowered, then elevators need to be made available for active transportation users.

e. There should be robust and consistent wayfinding signage and pavement markings to connect folks to trails, active transportation facilities, and transit stops on both sides of the bridge.
f. The active transportation and transit facilities are on opposite sides of the bridge. As a result, there is additional out of direction travel for people making trips that combine transit and walking/rolling/biking.
g. **We strongly encourage more study of design options that put transit and active transportation facilities together for increased access, safety, comfort, emergency response, and user options.**

2. **Safety, Comfort, and Equitable Access** If we are to meet or exceed active transportation usership goals, the system must be designed to be welcoming of those who are eight to eighty years old —by ensuring seamless, accessible pathways without extra distance or difficult grades. By integrating open views, rest areas, and close transit access, the bridge can become a safe, enjoyable route for all.
    a. Noise, dirt, and debris: Active transportation users need protection from road noise, dirt, and vehicle debris.
    b. Grade and Distance: Current designs require significant out of direction travel both in terms of distance and grade for active transportation users while single occupancy vehicle travel experiences little to no out of direction travel.
    c. Due to the long span of the bridge without the benefit of tree canopy, there should be provisions for shading the multi-use path as the number of days regional heat advisories continue to increase.
    d. Open views to appreciate nature: Positioning the active transportation facilities in a way to access views of nature can reduce stress and increase comfort, thus encouraging more users.
    e. If two-level bridge, prevent rain (and other liquid) runoff onto multi-use path
    f. Personal Safety - Bridge connections should adequately separate people walking, biking, and rolling from motor vehicles and bridge and approach pathways should include adequate lighting.
    g. Emergency Access -
        i. Medical and police vehicles must be able to directly access multi-use path. Lack of embedded rail ties prevent ambulances and emergency responders to directly support those using the multi-use path.
        ii. If emergency responders are expected to access multi-use path by parking on highway shoulder and scaling divider, we are concerned there is not sufficient separation between automobiles traveling at highway speeds and active transportation modes.

3. ***Operations & Maintenance of Active Transportation System***
    a. Active transportation paths must have a long term financial plan for clearing the right of way of debris, glass, trash, snow and ice, etc.
    b. The bridge maintenance and operations plan should include clearing active transportation routes and pathways on bridge and all along approaches

4. **Environmental and Climate Impact** We want a climate-resilient bridge that supports active and public transportation, reducing reliance on cars and cutting emissions long-term. An environmentally friendly design promotes cleaner, healthier spaces, with natural buffers and materials that help protect public health and the environment.
    a. As heat increases in the region, the need for climate-resilience/mitigation is necessary. This includes protection from the sun through natural and/or manmade shade.
    b. Reducing single occupancy vehicle miles traveled will reduce air particulate pollution.
    c. Modeshift to transit and active transportation also:
        i. Reduces noise pollution
        ii. Reduces the impacts of water runoff, including chemical, oil, tire particulate and brake particulate runoff
    d. Global impacts: The proposed design does little to reduce auto travel, estimating a 62% increase in study-area VMT over current amounts (Executive Summary, S-21). Shifting modeshare to active transportation and transit is the most effective method of reducing VMT and meeting specific state/regional climate goals.

About the Oregon Trails Coalition

The Oregon Trails Coalition advisory council includes representatives from more than thirty federal, state, and local agencies, trail user groups, outdoor industry and tourism partners, and volunteer organizations. We represent walkers, bikers, runners, paddlers, equestrians, adaptive equipment users, skiers, snowmobilers, and motorized trail enthusiasts.

We envision a statewide network of sustainable trails that: connect Oregonians of all backgrounds and abilities to the outdoors, build a culture of environmental and cultural stewardship and healthy recreation, provide an off-street network for traveling within and between Oregon communities, and attract a wide range of users that contribute to Oregon’s urban and rural economies.

IBR Draft SEIS - RECORD #2503 DETAIL

First Name :	Michele
Last Name :	Gila
Attachments :	DSEIS-2503_Gila_Original.pdf (173 kb) PMAR_Letter_on_IBR_Draft_Supplemental_Environmental_Impact_Statement.pdf (171 kb)

IBR Draft SEIS - RECORD #2503 DETAIL

Submission Date :	11/15/2024
First Name :	Michele
Last Name :	Gila
Business/Organization/Agency :	Portland Metropolitan Association of Realtors®
Attachments :	PMAR Letter on IBR Draft Supplemental Environmental Impact Statement.pdf (171 kb)

Submission Input :

The attached comment is submitted on behalf of:

Michele Gila
Portland Metropolitan Association of Realtors®
mgila@pmar.org
(503) 228-6595
150 SW Harrison Street, Suite 200
Portland, OR 97201

Thank you.

Kari Chisholm
Swift Public Affairs

PMAR
PORTLAND METROPOLITAN ASSOCIATION OF REALTORS®

November 14, 2024

Interstate Bridge Replacement Program,
Attn: Draft SEIS Public Comment
500 Broadway, Suite 200
Vancouver, WA 98660

To whom it may concern:

The Portland Metro Association of Realtors® (PMAR) fully supports the adoption and implementation of the Modified Locally Preferred Alternative (LPA) for the Interstate Bridge Replacement (IBR) project.

As a leading advocate for the real estate community in the Portland metro area, with over 7500 member Realtors® in the region, PMAR recognizes the critical importance of this project for enhancing regional connectivity, supporting economic growth, and addressing key transportation challenges.

Thank you for the opportunity to provide the following comments on the Draft Supplemental Environmental Impact Statement:

- **Congestion Pricing:** PMAR strongly endorses a variable-rate tolling approach as part of the Modified LPA. Unlike a flat toll, congestion pricing adjusts rates based on traffic conditions, which is more equitable for non-commuters and benefits Realtors® who often travel during off-peak hours. This model encourages commuters – including Realtors® – to shift travel to non-peak hours, reducing their financial burdens while helping to manage traffic demand.

- **Multimodal Investments:** PMAR supports the expansion of light rail transit (LRT), integration of bus services, and the inclusion of dedicated pedestrian and bike paths. Safe, separated infrastructure for these modes not only enhances accessibility but also reduces traffic congestion, making it easier for Realtors® and clients to navigate the region efficiently.

- **Safety and Climate Resilience:** The new bridge design prioritizes safety with wider shoulders, improved interchange connections, and earthquake resilience. PMAR views these features as essential for protecting the community and ensuring the infrastructure can withstand future climate challenges, supporting the long-term economic health of the region.

- **Facilitating Regional Integration:** The improved connectivity between Oregon and Washington will support a more integrated housing market, benefiting dual-licensed Realtors® who serve clients on both sides of the river. By alleviating traffic bottlenecks and enhancing transportation options, the project will make it easier for residents to live and work across state lines, supporting greater market fluidity and broader housing opportunities.

- **Economic Impact:** The IBR project will alleviate one of the most significant freight bottlenecks in the Pacific Northwest, facilitating smoother movement of goods and services. This will directly benefit local businesses and support the overall vitality of the regional economy.

- **Stakeholder Engagement:** PMAR urges continued collaboration with a diverse group of stakeholders, including Realtors®, throughout the planning and implementation phases of the project. Realtors® have unique insights into housing trends and market needs, and their input is crucial for crafting policies that support community growth and development. PMAR looks forward to being an active participant in these discussions.

- **Long-Term Infrastructure Resilience:** The new bridges will replace the aging structures and provide an earthquake-resilient, climate-friendly solution. This investment is essential for ensuring the safety of travelers and the reliability of critical transportation links, particularly in the event of a major seismic event.

- **Commitment to Sustainability:** The project's focus on low-emission travel options and reduced congestion supports regional climate goals, aligning with PMAR's advocacy for sustainable development practices that benefit both current and future residents.

PMAR strongly supports the Modified Locally Preferred Alternative (LPA) for the Interstate Bridge Replacement project. This comprehensive proposal addresses urgent transportation needs while laying the groundwork for a safer, more resilient, and economically vibrant region.

Thank you for your consideration.

Michele Gila
Director, Realtor® Advocacy

PMAR
PORTLAND METROPOLITAN ASSOCIATION OF REALTORS®

November 14, 2024

Interstate Bridge Replacement Program,
Attn: Draft SEIS Public Comment
500 Broadway, Suite 200
Vancouver, WA 98660

To whom it may concern:

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Thank you for the opportunity to provide the following comments on the Draft Supplemental Environmental Impact Statement:

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- **Commitment to Sustainability:** The project's focus on low-emission travel options and reduced congestion supports regional climate goals, aligning with PMAR's advocacy for sustainable development practices that benefit both current and future residents.

PMAR strongly supports the Modified Locally Preferred Alternative (LPA) for the Interstate Bridge Replacement project. This comprehensive proposal addresses urgent transportation needs while laying the groundwork for a safer, more resilient, and economically vibrant region.

Thank you for your consideration.

Michele Gila
Director, Realtor® Advocacy

IBR Draft SEIS - RECORD #2504 DETAIL

First Name :	Carol
Last Name :	Mayer-Reed
Attachments :	DSEIS-2504_MayerReed_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #2504 DETAIL

Submission Date : 11/15/2024
First Name : Carol
Last Name : Mayer-Reed
Business/Organization/Agency :

Submission Input :

First Name:
Carol

Last Name:
Mayer-Reed

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Other

Comment:
Active Transportation:
1. Consider placing the pedestrian/bike lanes on the west side of the bridge deck outbound of the LRT so that the proposed public elevator can be used.
The big corkscrew ramp on the Vancouver shore is not an acceptable solution for public access.
2. Consider the safety benefits of placing pedestrians and cyclists next to the LRT. More eyes will observe the

activities on the bridge due to the frequency of trains and its occupants. Perhaps this would be more of a deterrent to harmful encounters.
3. Consider more expedient links of destinations on Hayden Island and Vancouver for pedestrians and cyclists on the west side of the I-5 corridor rather than the east sides. There would be still be requirements for I-5 under crossings, but perhaps fewer people would need to use them.

JCA comment #: 427

IBR Draft SEIS - RECORD #2505 DETAIL

First Name :	Carol
Last Name :	Mayer-Reed
Attachments :	DSEIS-2505_MayerReed_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #2505 DETAIL

Submission Date : 11/15/2024
First Name : Carol
Last Name : Mayer-Reed
Business/Organization/Agency :

Submission Input :

First Name:
Carol

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Mayer-Reed

Email:
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Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Visual Quality

Comment:
1. Freeway widening is, without a doubt, one of the worst offenders in terms of urban livability and visual/physical/noise impacts to our neighborhoods, retail districts, historic properties and downtowns. Consider the harm that this project, as proposed, will inflict on our urbanized areas in both WA and OR.
2. Develop and publish visual impact studies as viewed from the Hayden Island, Vancouver Waterfront and downtown. Images shown do not capture these critical views, especially of the river and Mt. Hood as viewed

from parks and river greenways. Images from downtown Vancouver retain existing trees in the foreground that avoid portraying the reality of the impacts from the bridge and interchange proposals. These images are selectively deceiving to the public. Show the reality of heights, materials and structure impacts.
3. Any double-decker bridge option will create unacceptable visual impacts due to the density, thickness and weight of truss structures. Single deck bridge options will appear thinner and lighter, especially if metal railings are used rather than solid, noise-reflecting concrete barriers.
4. An extradosed bridge option may be more visually acceptable, due to lightness of deck, structure and cable arrays. Several bays of extradosed structure featured in the middle of the river might be considered in combination with girder spans closer to both shores.
5. Keep the overall height of the structure as low as possible.

JCA comment #: 426

IBR Draft SEIS - RECORD #2506 DETAIL

First Name :	Alan
Last Name :	Garcia
Attachments :	DSEIS-2506_Garcia_Original.pdf (6 kb)

IBR Draft SEIS - RECORD #2506 DETAIL

Submission Date : 11/15/2024
First Name : Alan
Last Name : Garcia
Business/Organization/Agency :

Submission Input :

First Name:
Alan

Last Name:
Garcia

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
I urge you to prioritize the access and experience for people walking, rolling (micro-mobility, etc.) and biking on the new I-5 span:
Enable direct access to the span at river grade from the WA and Oregon sides to support active transportation users noted above.
Provide separation from more vulnerable active transportation users and freight traffic. Doing so will support and foster active transportation. To this point, I support the well-designed Supplemental Environmental Impact Statement (SEIS) which offers a safe separation for active transportation users along the Interstate Avenue/Expo Way corridor
Ensure a seamless, conflict free connection from the Vancouver/Williams corridor, a major active transportation

route in Portland, to support and foster cross-state commuting.
Design a seamless active transportation access to the span from Marine Drive, another popular active transportation route. Doing so would facilitate greater east/west access, but it needs to prevent freight and active transportation conflicts. Active transportation usage will increase if users are safe.

JCA comment #: 425

IBR Draft SEIS - RECORD #2507 DETAIL

First Name :	Joyce
Last Name :	Morrelli
Attachments :	DSEIS-2507_Morrelli_Original.pdf (6 kb)

IBR Draft SEIS - RECORD #2507 DETAIL

Submission Date : 11/15/2024
First Name : Joyce
Last Name : Morrelli
Business/Organization/Agency :

Submission Input :

First Name:
Joyce

Last Name:
Morrelli

Email:
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Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Hayden Island Issues

Comment:
Tolling is going to be hardship for most of the folks that have been on the island. We have lived here for over 40 years and do most of shopping, doctors, dentists in Vancouver and even family live in Washington. Recently our family has needed ambulances and all kinds of emergency assistance and have for many years. Their ability to get in and off the island will be limited.
The freeway is going to go down the middle of the island. It is going to be huge. It will affect our home's resale

value and also affect people from Vancouver shopping on the island. This will have a big effect on our shopping center.

JCA comment #: 424

IBR Draft SEIS - RECORD #2508 DETAIL

First Name :	Carol
Last Name :	Mayer-Reed
Attachments :	DSEIS-2508_MayerReed_Original.pdf (6 kb)

IBR Draft SEIS - RECORD #2508 DETAIL

Submission Date : 11/15/2024
First Name : Carol
Last Name : Mayer-Reed
Business/Organization/Agency :

Submission Input :

First Name:
Carol

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City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Noise and Vibration

Comment:
1. The double-decker truss bridge will produce impacts in terms of noise pollution since vehicular sounds of engines and tires are reflected off the deck of the upper level. Mitigation of these hard surface are difficult due to the need to inspect the structures for cracks or other failures. This noise will affect public and private properties on both sides of the river, including the new Vancouver Waterfront, downtown and Hayden Island. Similar to the Marquam Bridge, real estate is devalued on adjacent properties and parks are highly unpleasant

to use. This is a critical issue to study as the bridge type selection moves forward.

JCA comment #: 423

IBR Draft SEIS - RECORD #2509 DETAIL

First Name :	Carol
Last Name :	Mayer-Reed
Attachments :	DSEIS-2509_MayerReed_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #2509 DETAIL

Submission Date : 11/15/2024
First Name : Carol
Last Name : Mayer-Reed
Business/Organization/Agency :

Submission Input :

First Name:
Carol

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City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
1. This project is being described as a bridge replacement project, but it's actually a freeway widening and interchange re-building project that's justified by the need for the replacement of aging bridges. This is deceptive to the general public. Focus on the bridge replacement and two adjacent on-shore interchanges. Let WDOT carry on with its freeway widening projects later, if warranted.
3. Avoid any impacts to the Ft. Vancouver National Park property and its historic buildings.

2. Simplify/reduce impacts of interchanges on both shores where possible. Treat local arterials as such rather than freeway to freeway interchanges.
3. Reconsider round-abouts on Marine Drive. Pedestrians and cyclists are at a disadvantage using round-abouts due to drivers only looking left before acceleration. Use stop signs or signalized intersections. Limit land consumptive physical project impacts where possible.
4. Reconsider single point urban interchange on Marine Drive. These SPUIs are oversized and very confusing to drivers.
5. Reconsider deleting the I-5 ramps onto Hayden Island, an interchange which is too close to Marine Drive. With the local bridge over the new harbor, drivers can use this connection to the island. Reduce the number of lanes over and on Hayden Island.

JCA comment #: 422

IBR Draft SEIS - RECORD #2510 DETAIL

First Name :	Paul
Last Name :	Buchanan
Attachments :	DSEIS-2510_Buchanan_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #2510 DETAIL

Submission Date : 11/15/2024
First Name : Paul
Last Name : Buchanan
Business/Organization/Agency :

Submission Input :

First Name:
Paul

Last Name:
Buchanan

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Phone:
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City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
Hello IBR Advisory Committee Members,
I am one of many many people who chooses not own a car and regularly travels between Portland & Vancouver as I work in building and construction.
As it is that I am fortunate to be able bodied, I typically ride my bike for transportation. I have driven over the I-5 bridge numerous times and, as inadequate the bridge is right now for people driving it is much much worse

for people crossing the river outside of a car. There is no protection from the 100+ decibel noise of the roadway and the sidewalks are barely wide enough for two people to pass on foot or on bike.
The new bridge needs not only adequate pedestrian and bike access, these need to be tied next to any transit services that are programed for the bridge. Putting transit lanes between vehicle lanes and the multi-use path on the bridge will make the space more welcoming and healthier for people riding and walking so they aren't exposed to the noise and are less directly exposed to tailpipe emissions when traffic inevitably grinds to a halt.
Further there needs to be better bike and pedestrian connections into downtown Vancouver so that, as soon as people exit the bridge to the north, they aren't forced into vehicle traffic speeding to get to the bridge. The same goes for the Portland connection; it needs to get directly to already well established multimodal corridors at Denver in Kenton as well as Williams and Vancouver.
This bridge has the opportunity to stand as a testament to the ingenuity and creativity of all the people of the Portland and Vancouver metros. Right now it seems like it is only being built by and for people relying solely on the fossil fuel and oil industries to get around. It needs to rise to meet the low carbon needs of now and the quickly approaching future.
Thank you for your time,
-Paul

JCA comment #: 421

IBR Draft SEIS - RECORD #2511 DETAIL

First Name :	Eric
Last Name :	Oliver
Attachments :	DSEIS-2511_Oliver_Original.pdf (6 kb)

IBR Draft SEIS - RECORD #2511 DETAIL

Submission Date : 11/15/2024
First Name : Eric
Last Name : Oliver
Business/Organization/Agency :

Submission Input :

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Eric

Last Name:
Oliver

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Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
The Interstate Bridge Replacement project must ensure complete and safe connections to the existing walking, biking, and rolling corridors in Oregon. These pathways need to be as physically separated from freight traffic as possible, especially in areas where new ramps and interchanges will be constructed. Maximizing this separation is key to creating safer, more attractive, and therefore more heavily used walking, rolling, and biking routes.

JCA comment #: 420

IBR Draft SEIS - RECORD #2512 DETAIL

First Name :	Kenneth
Last Name :	Visser
Attachments :	DSEIS-2512_Visser_Original.pdf (5 kb)

IBR Draft SEIS - RECORD #2512 DETAIL

Submission Date :	11/15/2024
First Name :	Kenneth
Last Name :	Visser
Business/Organization/Agency :	The Arnada Neighborhood Association

Submission Input :

The Arnada Neighborhood Association

Vancouver, Washington

November 15, 2024

Interstate Bridge Replacement Team

DraftSEIS@interstatebridge.org

Dear IBR Team:

The Arnada Neighborhood is within the city limits of Vancouver Washington. Its bounds are Interstate 5 on the east, Fourth Plain Road on the north, Broadway Street on the west, and 15th Street on the south.

The Arnada Neighborhood Association (ANA) was organized in 1976 under Vancouver City ordinances providing for the establishment of neighborhood associations within the city of Vancouver. The ANA was established by the residents of Arnada Neighborhood to unite common interests and promote the welfare of the neighborhood and its residents. The ANA concerns itself with livability and sustainability for all within the neighborhood and the community in general.

Recently the ANA met and articulated its concerns about and suggestions regarding the Interstate Bridge Replacement project. Please accept these

concerns and suggestions as comments regarding the IBR draft SEIS.

Respectfully, on behalf of the ANA,

/s/

Kenneth M. Visser

Chairman, Arnada Neighborhood Association

##

Arnada Neighborhood Association Concerns About and Suggestions Regarding the Interstate Bridge Replacement Project

The Interstate Bridge Replacement project construction plans and post-construction operation will have impacts on Vancouver's Arnada Neighborhood, including vibration, audible, visual and air quality impact. Neighborhood residents look forward to working with project officials, staff, and consultants to determine ways to mitigate the negative impacts. The Arnada Neighborhood Association (ANA) submits the following comments.

Neighborhood concerns include:

Auditory, visual, and air quality impacts on single and multi-family residential units, commercial properties, and Arnada Park. To mitigate adverse impacts, the ANA will advise project planners on sound wall construction, height, and aesthetics.

· Trees will be planted in the neighborhood and adjacent areas to replace those that will be removed for construction. They will be planted as soon as the remaining construction will not damage them. The number of trees planted will be double the number removed to help offset air quality impacts and enhance air quality. The project will ensure the survival or replacement of the trees for 10 years.

· The sound wall will receive the highest standard anti-graffiti coating available at the time of its construction, and the project will ensure funding for graffiti removal for 25 years from date of completion.

· *The ANA urges that the sound wall be designed to be as esthetically pleasing as possible*, particularly when viewed from the west.

Construction vibration impacts. To mitigate adverse impacts of construction vibrations, the project will provide vibration monitoring for buildings and streets from D Street east to the freeway within the neighborhood boundaries. Any damage that occurs will be repaired promptly at project expense.

According to the draft SEIS, project construction is anticipated to *utilize portions of Arnada Park as a staging area*. To mitigate adverse construction equipment and similar impacts on the property, the park will be returned to the state it was in when staging commenced. To mitigate the impact of neighborhood residents not being able to fully use the park during construction and the probable impact of property lost to the sound wall, the project will install a kickball field and replace the basketball court.

Being kept up-to-date on project schedule. While it is understood that all dates will be in flux for a period of time, neighborhood residents need to know what will happen when so that they can adjust as much as possible.

The ANA is concerned that *a design is not yet available for the Fourth Plain Boulevard overpass* adjacent to the neighborhood. The ANA will have

input on the overpass design when available.

The ANA *advocates for construction of the proposed community connector* between downtown Vancouver and the Vancouver National Historic Reserve to ensure that the IBR does not worsen the existing I-5 separation between these two important community resources.

The ANA urges *robust mitigation for all adverse effects of the IBR project on historic and archaeological resources*. The Vancouver National Historic Reserve and Providence Academy have played important roles in community life historically and continue to do so. Project mitigation should help ensure that these significant resources, all listed on the National Register of Historic Places, are passed on to the future.

The ANA opposes tolling until the project is complete. Residents are happy to pay bridge tolls after the Bridge is finished and all modifications to I-5 are completed. Until that time we expect to live with dirty air, construction noise and vibration, a smaller and less safe park and likely a decade of traffic jams. We cannot accept tolls along with these afflictions. We require a toll exemption for Arnada residents until completion.

---END---

IBR Draft SEIS - RECORD #2513 DETAIL

First Name :	Betsy
Last Name :	Reese
Attachments :	DSEIS-2513_Reese_Original.pdf (6 kb)

IBR Draft SEIS - RECORD #2513 DETAIL

Submission Date : 11/15/2024
First Name : Betsy
Last Name : Reese
Business/Organization/Agency :

Submission Input :

First Name:
Betsy

Last Name:
Reese

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
The IBR design must improve safety and comfort for people who walk, bike, roll and use transit. The current plan is inadequate. Please collaborate with local advocates and advocacy groups, like The Street Trust and BikeLoud, to formulate a plan that better considers active transportation.

JCA comment #: 419

IBR Draft SEIS - RECORD #2514 DETAIL

First Name :	Steve
Last Name :	Bozz
Attachments :	DSEIS-2514_Bozz_Original.pdf (6 kb)

IBR Draft SEIS - RECORD #2514 DETAIL

Submission Date : 11/15/2024
First Name : Steve
Last Name : Bozz
Business/Organization/Agency :

Submission Input :

First Name:
Steve

Last Name:
Bozz

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
The IBR as currently scoped is too enormous, too massive, too costly and unnecessary. Focus on the core needs of the region that reflect our modern budget realities. Focus on the bridge crossing, re-examine less costly options such as an immersed tunnel, and pull out most of the unnecessary auxiliary lanes and interchanges which are not justified by any measure. Oregonians and Washingtonians have waited a long time for this project to commence, let's get it right for the sake of our children, which includes ensuring this project is part of the region's carbon-reduction goals.

As currently proposed the IBR would induce demand for driving and increase carbon and diesel emissions. That is the wrong way. Let's get on the right track: reduce the size of the bridge, reduce the number of lanes,

increase the areas of the bridge that are dedicated to transit, walking and biking connections. Thank you.

JCA comment #: 418

IBR Draft SEIS - RECORD #2515 DETAIL

First Name :	Gary
Last Name :	Shaff
Attachments :	DSEIS-2515_Shaff_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #2515 DETAIL

Submission Date : 11/15/2024
First Name : Gary
Last Name : Shaff
Business/Organization/Agency :

Submission Input :

First Name:
Gary

Last Name:
Shaff

[redacted]

Topic Area:
Transportation

Comment:
The new bridge crossing reflects Oregon's old school approach to transportation improvements where the legislature identified and funded projects which, almost exclusively, improved travel times for auto/truck drivers. Southern Oregon's "expressway" was constructed under the 2019 transportation bill along with projects throughout the state - identified as much to distribute the spoils rather than to address a real transportation need. The "real" transportation need at this point given the climate, social justice, housing affordability and health is investing in walking and bicycle networks within urban areas of the state. The interstate bridge will not solve intercity transportation problems and will, in all likelihood, make them worse by increasing congestion and climate damage.
I'm perplexed why ODOT would propose a project that will, without question, increase vehicle miles of travel in Region 1, contrary to the State goal of reducing them by 30 percent. You'd think that ODOT would have learned that you can't add capacity without inducing demand and thus undermine any benefit the project sponsors might have originally forecast.

JCA comment #: 417

IBR Draft SEIS - RECORD #2516 DETAIL

First Name :	Rob
Last Name :	Galanakis
Attachments :	DSEIS-2516_Galanakis_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #2516 DETAIL

Submission Date : 11/15/2024
First Name : Rob
Last Name : Galanakis
Business/Organization/Agency :

Submission Input :

First Name:
Rob

Last Name:
Galanakis

[redacted]

[redacted]

[redacted]

[redacted]

Topic Area:
Transportation

Comment:
My daughter loves squirrels. There is a squirrel rescue in Vancouver she would love to volunteer at. But, we do not drive, and when looking at the options for getting to Vancouver, I told her volunteering wasn't in the cards. So when the IBR SDEIS came out, I was optimistic that we'd have better multi-modal routes (transit and bike) to help my daughter's dream come true.
Unfortunately, the configuration of the bridge was a major disappointment:
- The bridge was so impossibly high that even my ebike would have a hard time.
- The configuration of transit and bike path connections/ramps introduced delays and extra travel.
To make the bridge useful for active transit- which is required to hit the goals listed in the SDEIS! - the design should include transit and MUP next to each other (with transit lanes as a buffer to car lanes), more elevators,

and connections to Evergreen in the north and Vancouver/Williams in the south. These are all vital changes needed to make using this bridge for transportation work.

JCA comment #: 416

IBR Draft SEIS - RECORD #2517 DETAIL

First Name :	Joel
Last Name :	Havens
Attachments :	DSEIS-2517_Havens_Original.pdf (216 kb) image001.png (14 kb) DRAFT SEIS I5 BRIDGE.pdf (210 kb)

IBR Draft SEIS - RECORD #2517 DETAIL

Submission Date :	11/15/2024
First Name :	Joel
Last Name :	Havens
Business/Organization/Agency :	[redacted]
Attachments :	DRAFT SEIS I5 BRIDGE.pdf (210 kb)

Submission Input :

Hi Greg,

Please find attached our letter in support of the I5 Bridge Draft SEIS.

Thank you,

Joel Havens
[redacted]

Halbert Construction Services LLC

12013 NE 99th St., Suite1630
Vancouver, WA 98682
360.772.1406
WA LIC# HALBECS896O9
OR CCB# 203014

November 13, 2024

Program Administrator Greg Johnson
Interstate Bridge Replacement Program
500 Broadway St, Ste 200
Vancouver, WA 98660

RE: Draft SEIS Public Comment

Dear Program Administrator Johnson:

On behalf of the Vancouver Washington based construction company and our employees. We offer our support for plans outlined in the Draft Supplemental EIS regarding replacing the I-5 bridge and improving its five-mile influence area.

Halbert Construction Services works on projects in both SW Washington and the Portland metro area. Many of our clients are non-profit organizations that are vital to addressing the needs of the region. Our employees, subcontractors and suppliers traverse the I-5 bridge and influence area daily

Despite a very tight geographic configuration within a built environment, we support the comprehensive multi-modal program design that would accommodate an additional 66,000 person-trips and 32,000 vehicle-trips through the corridor each day by 2045, while reducing accidents and backups. The proposal makes improvements by adding safety shoulders, a dedicated public transit lane, active transportation and auxiliary merge lanes. It also makes river navigation safer and protects ecosystems through modern stormwater management.

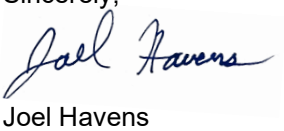
We recommend pursuing a single-level fixed-span configuration with two auxiliary lanes, allowing for an overall more gradual grade and no traffic-stopping lift span which brings obvious improvements to congestion, accident reduction and climate.

We prefer the following:

- A second auxiliary lane wherever possible.
- Mitigation to support displaced or disrupted business during and after construction.
- A local user fee rate that reflects existing tax burdens shouldered by commuters, freight and commerce, and is eliminated after construction bonds are paid.
- Consideration for workforce housing.
- Retention of C Street ramps for secondary access to downtown Vancouver.
- Commencing construction as soon as possible, given rising construction costs.

We appreciate the efforts of all involved in planning, design and funding of this critical transportation facility expected to last a century.

Sincerely,



Joel Havens
Project Manager
Halbert Construction Services

Halbert Construction Services LLC

12013 NE 99th St., Suite1630
Vancouver, WA 98682
360.772.1406
WA LIC# HALBECS896O9
OR CCB# 203014

November 13, 2024

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500 Broadway St, Ste 200
Vancouver, WA 98660

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Despite a very tight geographic configuration within a built environment, we support the comprehensive multi-modal program design that would accommodate an additional 66,000 person-trips and 32,000 vehicle-trips through the corridor each day by 2045, while reducing accidents and backups. The proposal makes improvements by adding safety shoulders, a dedicated public transit lane, active transportation and auxiliary merge lanes. It also makes river navigation safer and protects ecosystems through modern stormwater management.

We recommend pursuing a single-level fixed-span configuration with two auxiliary lanes, allowing for an overall more gradual grade and no traffic-stopping lift span which brings obvious improvements to congestion, accident reduction and climate.

We prefer the following:

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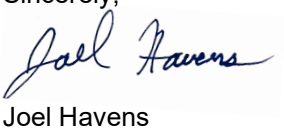
- A local user fee rate that reflects existing tax burdens shouldered by commuters, freight and commerce, and is eliminated after construction bonds are paid.
- Consideration for workforce housing.
- Retention of C Street ramps for secondary access to downtown Vancouver.
- Commencing construction as soon as possible, given rising construction costs.

We appreciate the efforts of all involved in planning, design and funding of this critical transportation facility expected to last a century.

Sincerely,



Joel Havens
Project Manager
Halbert Construction Services

IBR Draft SEIS - RECORD #2518 DETAIL

First Name :	Robert
Last Name :	Galanakis
Attachments :	DSEIS-2518_Galanakis_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #2518 DETAIL

Submission Date :	11/15/2024
First Name :	Robert
Last Name :	Galanakis
Business/Organization/Agency :	Lithic Technology

Submission Input :

First Name:
Robert

Last Name:
Galanakis

[redacted]

Topic Area:
Other

Comment:
When the new size of the IBR budget was announced two years ago, Representative Pham asked IBR Administrator Johnson, how confident he felt in the new budget and how to avoid cost overruns.
The Administrator's response did not inspire any confidence. He said he "felt really good" about these numbers and that the best way to avoid overruns was to "get the project started as soon as possible." He seemed to ignore the almost inevitable outcome that this project could cost 50% more than budgeted, like many other

megaprojects do. He was unwilling to entertain the idea of paring down the project by avoiding the interchange rebuilds (and whatever the implications of that would be).
At one point, one of the leads of the legislative committee blurted out that, if we don't build this bridge, the federal money goes away! It seemed like he was giving away the game.
This did not feel like a group of citizens trying to find a constructive way forward to benefit everyone in our region; it seemed like a small group of people had a thing they wanted to see done, costing as much as possible, and anyone standing in the way was seen as an obstructionist.
I have two children who I hope will grow up and age in the Portland area. My concerns with this project are not about the short-term impacts of "free" federal money. My concerns, along with most others, are about the impacts of a poorly-conceived project that saddle the region with debt, emissions, and worse transportation options, for decades to come.
I ask the IBR to right-size the project to the bare minimum needed to accomplish the goals of a seismically resilient bridge. Perhaps even one that is low to the river, and supports only transit and active transportation, like the Tillikum Crossing does. As we see in the case of the Tillikum Crossing, these investments can have massive impacts, like the imminent development of the area for Major League Baseball. Using Zidell Yards for an MLB stadium would have been impossible without the Crossing. A similar crossing of the Columbia could have similar impacts on both sides of the river. The delays created by such a project would be more than offset by the price savings, and the far better generational impact.
If such a project isn't deemed possible politically, then there are still many areas to cut scope to save money, such as limiting the width of the bridge, using a lift, and not rebuilding the exchanges (or rebuilding them last, only if the rest of the project is on budget).

JCA comment #: 415

IBR Draft SEIS - RECORD #2519 DETAIL

First Name :	Robert
Last Name :	Galanakis
Attachments :	DSEIS-2519_Galanakis_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #2519 DETAIL

Submission Date : 11/15/2024
First Name : Robert
Last Name : Galanakis
Business/Organization/Agency :

Submission Input :

First Name:
Robert

Last Name:
Galanakis

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

Topic Area:
Induced Demand

Comment:
Hello IBR team.
I am a business owner, and part of making good decisions is basing them on good data. If, for example, I want to grow my business through advertising, I would look at the performance of previous ads. If I had questions, I would run experiments. For more complex analysis, I would rely on more complex modeling.
The most important aspect of any model is that it can predict past performance. If the model couldn't, why

would I use it? How could I justify basing a business decision on a model that can't pass its most basic test? Unfortunately, the IBR modeling seems to fail this most basic test. Other comments have explained the issues with the modeling at length, so I'll focus on the impacts of the invalid model.

Everything has a tradeoff. The SDEIS makes evaluating such tradeoffs impossible, because it does not model impacts properly. How can we choose between 0/1/2 auxiliary lanes? How can we evaluate whether the interchange rebuilds are needed? How can we evaluate the impact of a lift bridge? We're being asked to weigh in using a model that doesn't correspond to reality.

It is depressing that the IBR team responsible for public engagement seems to realize this. At their presentation to the Southeast Uplift Transportation and Land Use group, they were unwilling to explain their modeling choices and limitations. They claimed that Metro provided the model, and the number of regional trips, and they just make it all work out. There was no explanation for the lack of acknowledgement of induced demand. This would not have been a suitable response for a college assignment; it is certainly not appropriate for a project that will cost $7+ billion dollars.

I would ask the IBR to perform a new EIS with better modeling so we can properly evaluate the impacts of this generational project.

JCA comment #: 414

IBR Draft SEIS - RECORD #2520 DETAIL

First Name :	Christian
Last Name :	Grand
Attachments :	DSEIS-2520_Grand_Original.pdf (6 kb)

IBR Draft SEIS - RECORD #2520 DETAIL

Submission Date :	11/15/2024
First Name :	Christian
Last Name :	Grand
Business/Organization/Agency :	

Submission Input :

Hello,

I am a resident of Portland.

Please make sure the bridge has a MAX train so folks can easily and quickly cross the bridge during rush hour.

Please also make sure the bridge has a bicycle lane.

Thank you,
~Christian Grand

[redacted]

--
Christian Grand, [redacted]
[redacted]

IBR Draft SEIS - RECORD #2521 DETAIL

First Name :	Karen
Last Name :	Waggoner
Attachments :	DSEIS-2521_Waggoner_Original.pdf (337 kb) West_Side_Mulituse_Path.pdf (335 kb)

IBR Draft SEIS - RECORD #2521 DETAIL

Submission Date :	11/15/2024
First Name :	Karen
Last Name :	Waggoner
Business/Organization/Agency :	
Attachments :	West Side Mulituse Path.pdf (335 kb)

Submission Input :

The IBR proposes building the light rail line on the south bound main bridge and the multiuse path on the north bound main bridge span. The IBR proposal makes each system separate from each other. The IBR proposal makes connections between these two systems difficult and inefficient for transit and active transportation users.

Karen Waggoner, [redacted]

[redacted]

Waggoner Family **November 15, 2024**

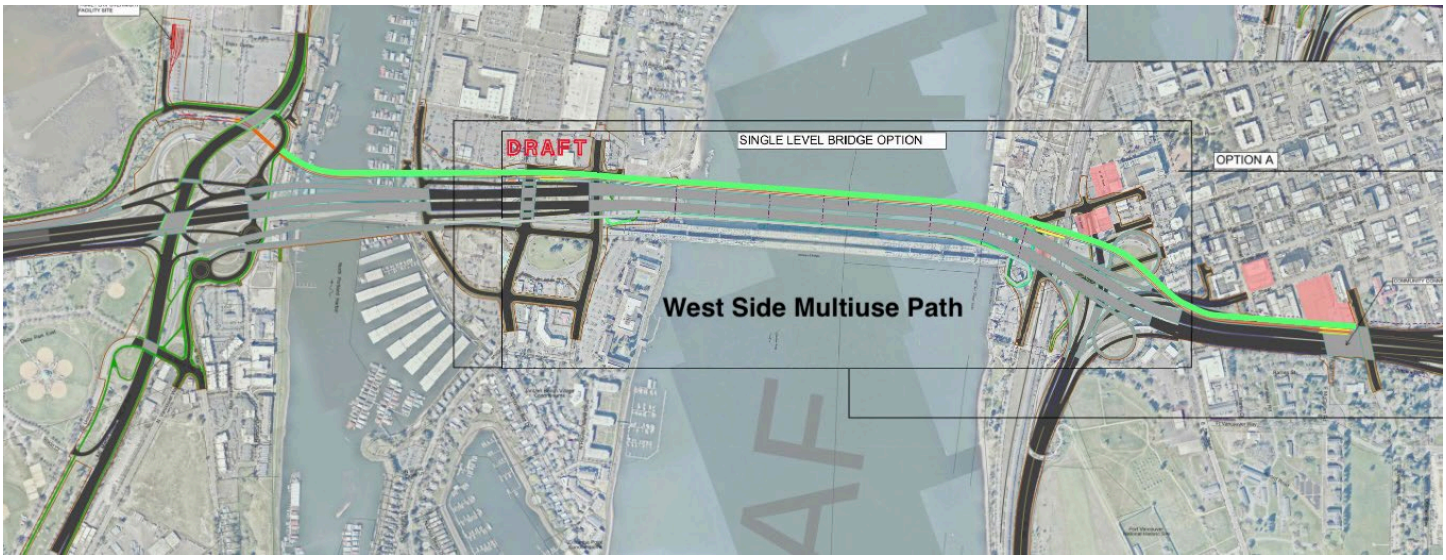
[redacted]

Re: Study building the multi-use path and the light rail line on the west side of the south-bound main bridge

The IBR proposes building the light rail line on the south bound main bridge and the multiuse path on the north bound main bridge span. The IBR proposal makes each system separate from each other. The IBR proposal makes connections between these two systems difficult and inefficient for transit and active transportation users.

The IBR proposal has stairs and elevators providing connections for transit users but the stairs and elevators are not usable for users of the multi-use path. The multi-use path has ramp connections for users that are not usable for transit riders. Though these two systems are parallel to each other, but they are entirely separated systems. These systems do not connect easily even though active transportation users want to connect to transit.

We believe additional study is needed to connect these two systems together. People who are not driving to their destination, a goal of the IBR, will often use several modes to reach their destination. Users may ride their bikes to a light rail station, place their bikes on the train in storage specially design for bikes on the light rail train, then ride their bikes for the final leg of their trip. The IBR design of entirely separate light rail and multiuse path makes these blended trips difficult.



One idea that needs to be studied more is to build the multiuse path next to the light rail alignment on the south bound main bridge. Compared to the multiuse path on the east side of the main bridge, the multiuse path on the west side next to the light rail alignment better meets the purpose and needs statement for the IBR to (b) improve connectivity, reliability, travel times, and operations of public transportation modal alternatives in the Program area. The west side alignment provides the following improvements:

• Seamless Transition: Users should easily switch between transit and active transportation at any station, with no grade changes or distance barriers.

• Shared Elevator Access: Allowing active transportation users to share transit station elevators eliminates the need for additional infrastructure, making the design more efficient and accessible.
• Creates reductant ways to connect to both transit and multiuse path: If the elevator is not working, users can use the ramp or stairs. User not able to negotiate going up the long ramps can use the elevator. Bike users who get a flat tire on the multiuse path can connect to the light rail station and still get to their destination.

• Provides Eyes on the Path: Transit operators and passengers provide a continuous presence, reducing the isolation felt on a multi-use path and enhancing safety and comfort.

• Better Emergency Egress: The multi-use path should double as an emergency exit route for the transit way, supporting user safety during unexpected events.

• Inclusive Design Principles: These principles ensure the accessibility and usability of both transit and active transportation facilities for individuals of all abilities.

• By building the multiuse path on the west side of the light rail trackway provides greater separation from vehicle noise and would offer a more pleasant experience for active transportation users compared to a multiuse path on the east side immediately next to vehicle travel.

• If the multiuse path was built next to the light rail line on the light rail bridge crossing North Portland Harbor, then the multiuse path connection to the 40 Mile loops would be direct rather than out of direction when the multiuse path is on the local Harbor Bridge.

Regarding Views: There is a good view of Mt Hood if the multiuse path in on the east side of the north bound main bridge, however there is a good view to the west too. Additionally, a quality view of North Portland Harbor and Mt Hood views could be experienced on the local harbor bridge, but the IBR proposes the multiuse path on the west side of that local Harbor Bridge. The IBR also shows a side walk on the east side of the local Harbor Bridge. We propose that the side walk on the east side of the Local Harbor Bridge be as wide as possible and include wide spots for stopping on the route to rest and appreciate one of the region's best view of North Portland Harbor.

View East from Local Harbor Bridge

Thank you,
Karen Waggoner

Waggoner Family
10 NE Bridgeton Road
Portland, OR 97211
karen.waggoner@comcast.net

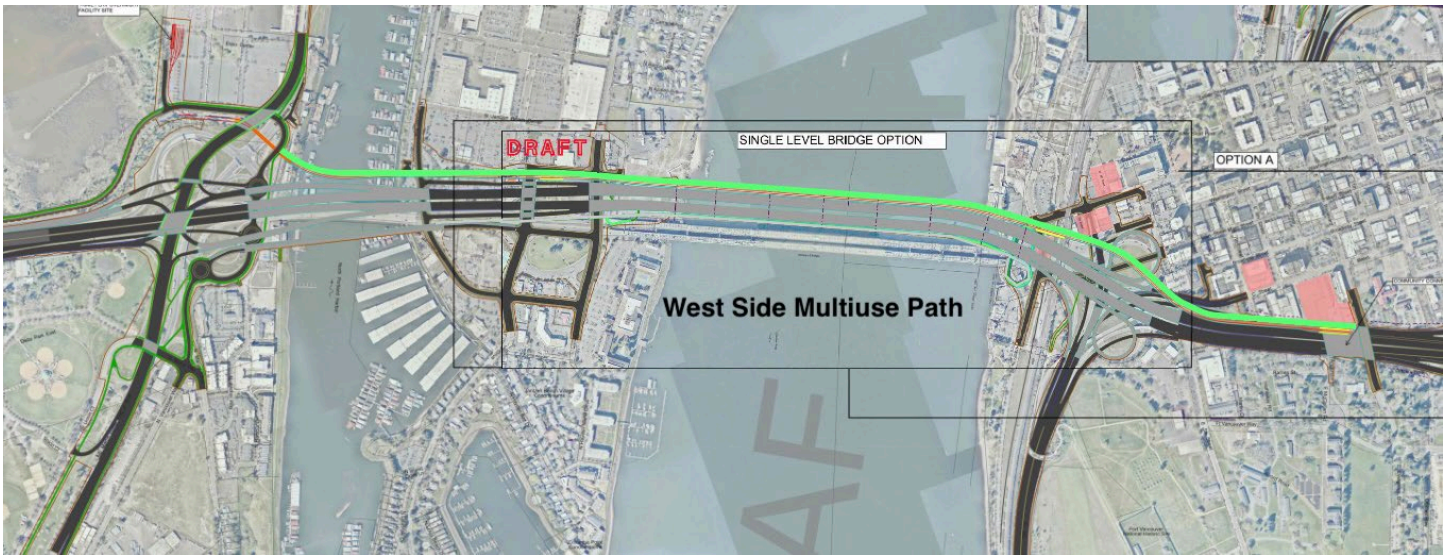
November 15, 2024

Re: Study building the multi-use path and the light rail line on the west side of the south-bound main bridge

The IBR proposes building the light rail line on the south bound main bridge and the multiuse path on the north bound main bridge span. The IBR proposal makes each system separate from each other. The IBR proposal makes connections between these two systems difficult and inefficient for transit and active transportation users.

The IBR proposal has stairs and elevators providing connections for transit users but the stairs and elevators are not usable for users of the multi-use path. The multi-use path has ramp connections for users that are not usable for transit riders. Though these two systems are parallel to each other, but they are entirely separated systems. These systems do not connect easily even though active transportation users want to connect to transit.

We believe additional study is needed to connect these two systems together. People who are not driving to their destination, a goal of the IBR, will often use several modes to reach their destination. Users may ride their bikes to a light rail station, place their bikes on the train in storage specially design for bikes on the light rail train, then ride their bikes for the final leg of their trip. The IBR design of entirely separate light rail and multiuse path makes these blended trips difficult.



One idea that needs to be studied more is to build the multiuse path next to the light rail alignment on the south bound main bridge. Compared to the multiuse path on the east side of the main bridge, the multiuse path on the west side next to the light rail alignment better meets the purpose and needs statement for the IBR to (b) improve connectivity, reliability, travel times, and operations of public transportation modal alternatives in the Program area. The west side alignment provides the following improvements:

• Seamless Transition: Users should easily switch between transit and active transportation at any station, with no grade changes or distance barriers.

• Shared Elevator Access: Allowing active transportation users to share transit station elevators eliminates the need for additional infrastructure, making the design more efficient and accessible.
• Creates reductant ways to connect to both transit and multiuse path: If the elevator is not working, users can use the ramp or stairs. User not able to negotiate going up the long ramps can use the elevator. Bike users who get a flat tire on the multiuse path can connect to the light rail station and still get to their destination.

• Provides Eyes on the Path: Transit operators and passengers provide a continuous presence, reducing the isolation felt on a multi-use path and enhancing safety and comfort.

• Better Emergency Egress: The multi-use path should double as an emergency exit route for the transit way, supporting user safety during unexpected events.

• Inclusive Design Principles: These principles ensure the accessibility and usability of both transit and active transportation facilities for individuals of all abilities.

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View East from Local Harbor Bridge

Thank you,
Karen Waggoner

IBR Draft SEIS - RECORD #2522 DETAIL

First Name :	Zachary
Last Name :	Clark
Attachments :	DSEIS-2522_Clark_Original.pdf (6 kb)

IBR Draft SEIS - RECORD #2522 DETAIL

Submission Date : 11/15/2024
First Name : Zachary
Last Name : Clark
Business/Organization/Agency :

Submission Input :

First Name:
Zachary

Last Name:
Clark

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

Topic Area:
Transportation

Comment:
Please make sure mass transportation and cycling/pedestrian are considered and put close to each other for ease of use and "Multimodal" transport.

JCA comment #: 413

IBR Draft SEIS - RECORD #2523 DETAIL

First Name :	Karen
Last Name :	Waggoner
Attachments :	DSEIS-2523_Waggoner_Original.pdf (567 kb) 40_Mile_Loop_Connections.pdf (564 kb)

IBR Draft SEIS - RECORD #2523 DETAIL

Submission Date :	11/15/2024
First Name :	Karen
Last Name :	Waggoner
Business/Organization/Agency :	
Attachments :	40 Mile Loop Connections.pdf (564 kb)

Submission Input :

The 40-Mile Loop is a comprehensive regional trail system forming a central Hub that connects nearly all other regional trails and parks within Multnomah County. The Loop alignment, which has been planned and incorporated into regional land use frameworks for over 40 years. While the trail alignment for the 40-Mile Loop has long been established, certain easements remain unacquired, and some portions of the trail are yet to be constructed.

The adopted alignment of the 40-Mile Loop passes through the area impacted by the Interstate Bridge Replacement (IBR) project. While the IBR project provides several benefits to the 40-Mile Loop, we believe additional study is warranted to make the proposed trails safer and more usable.

Karen Waggoner, [redacted]

[redacted]

Waggoner Family **November 15, 2024**

[redacted]

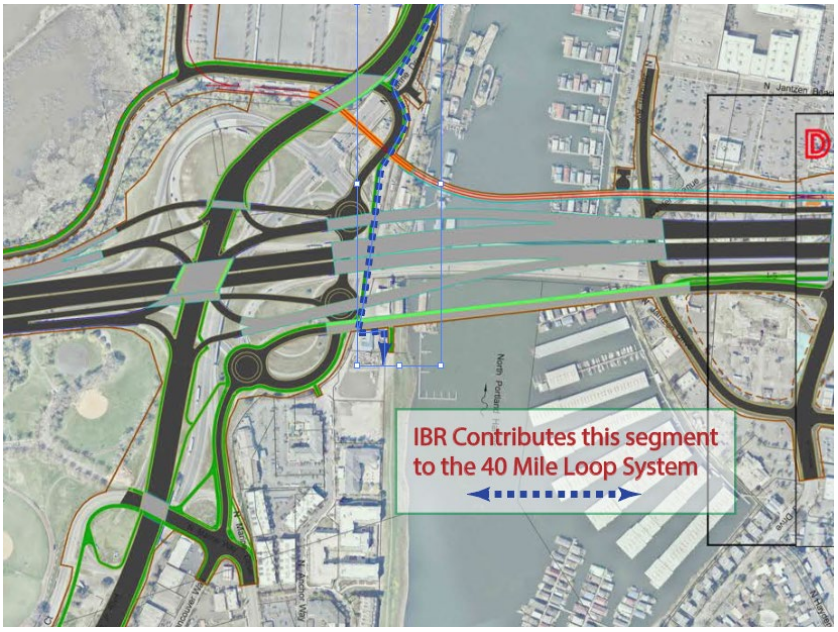
Re: IBR multi-use path connections to the 40-Mile Loop East/West Corridor

The 40-Mile Loop is a comprehensive regional trail system forming a central Hub that connects nearly all other regional trails and parks within Multnomah County. The Loop alignment, which has been planned and incorporated into regional land use frameworks for over 40 years. While the trail alignment for the 40-Mile Loop has long been established, certain easements remain unacquired, and some portions of the trail are yet to be constructed.

The adopted alignment of the 40-Mile Loop passes through the area impacted by the Interstate Bridge Replacement (IBR) project. While the IBR project provides several benefits to the 40-Mile Loop, we believe additional study is warranted to make the proposed trails safer and more usable.

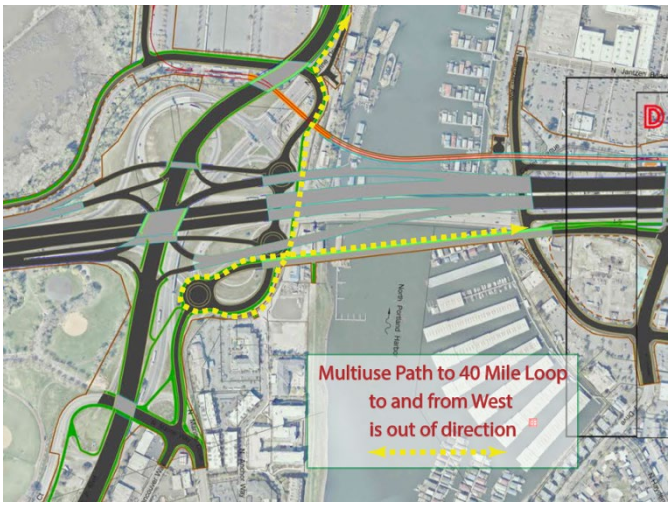
IBR Positive Contributions to the 40-Mile Loop Trail

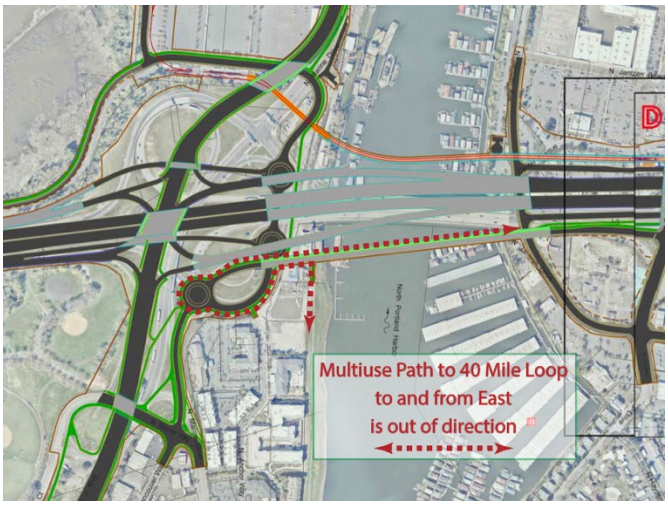
The IBR project will construct the segment of the 40-Mile Loop within the project area. This new trail segment will provide a safe, separated trail connecting the existing 40-Mile Loop trail located west of the proposed bridges through the project area, under the many new IBR bridges emanating from mainland Portland. After crossing under the local Harbor Bridge, the east most bridge proposed, the IBR will stub out the Trail to the East for a future connection to the Bridgeton Trails segment of the 40 Mile Loop. This is a good trail addition to the 40 Mile Loop and appreciated by the 40 Mile Loop Land Trust board.



Concerns with the Proposed Connection of 40 Mile Loop to the multiuse path on the local Harbor Bridge.

However, the proposed trail connections from the multiuse path on the local Harbor Bridge to the new 40-Mile Loop segment is not optimal. The proposed design requires users to travel out of their way, navigating a traffic circle and crossing vehicle lanes to reach both the eastbound and the westbound trail connection. This routing is neither convenient nor efficient and could discourage its use.





Request for Further Study of better East and West Connections to the 40 Mile Loop

We strongly recommend that alternative design options be considered to provide a more direct, connection to and from the east and west to the local Harbor Bridge multiuse path.

Possible additional study include:

1) Creating a direct connection from the East stub of the Bridgeton Trail to the sidewalk on the east side of the local Harbor Bridge. This direct connection would make it easier and more appealing for cyclists and pedestrians to cross the Harbor Bridge, while also offering a scenic route with views of North Portland Harbor and Mt Hood.
2) Additionally, we request that the sidewalk on the east side of the local Harbor Bridge be designed to be as wide as possible, with areas to rest and enjoy the views, further enhancing the experience for users.
3) Study more direct trail connections from the local Harbor Bridge multi use path to both the east and the west that do not involve routes around the Marine Drive traffic circles and crossing travel lanes.
4) Study routing the IBR entire multiuse path on the west side of the bridges rather than the east side. If the multiuse path was located on the light rail bridge on the west side, the east and west connection would be straight forward and direct. The west side multi use path is discussed more in a separate comment.
5) Lastly, we have a separate comment on ways the IBR could facilitate more just a stub for the east side connection to the Bridgeton Trail segment of the 40 Mile Loop.

Thank you,
Karen Waggoner

Waggoner Family
10 NE Bridgeton Road
Portland, OR 97211
karen.waggoner@comcast.net

November 15, 2024

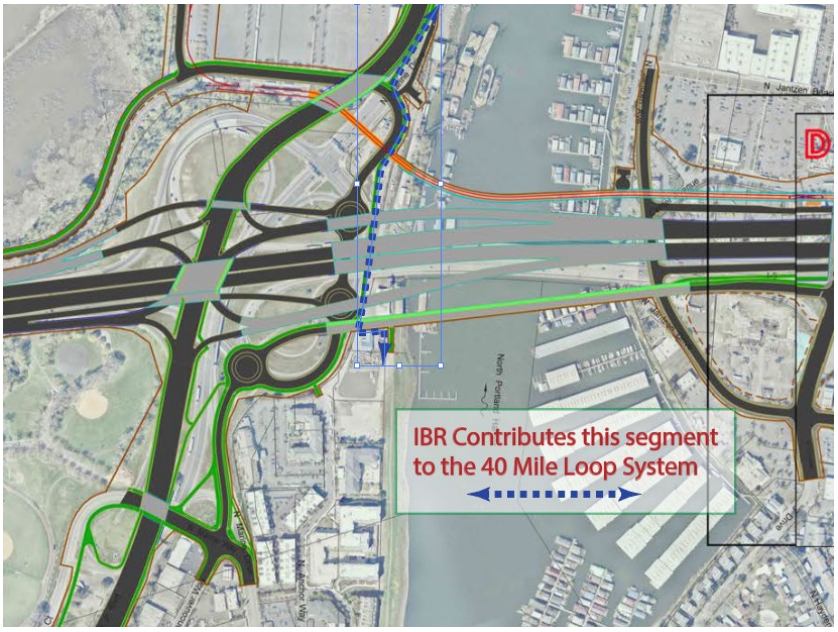
Re: IBR multi-use path connections to the 40-Mile Loop East/West Corridor

The 40-Mile Loop is a comprehensive regional trail system forming a central Hub that connects nearly all other regional trails and parks within Multnomah County. The Loop alignment, which has been planned and incorporated into regional land use frameworks for over 40 years. While the trail alignment for the 40-Mile Loop has long been established, certain easements remain unacquired, and some portions of the trail are yet to be constructed.

The adopted alignment of the 40-Mile Loop passes through the area impacted by the Interstate Bridge Replacement (IBR) project. While the IBR project provides several benefits to the 40-Mile Loop, we believe additional study is warranted to make the proposed trails safer and more usable.

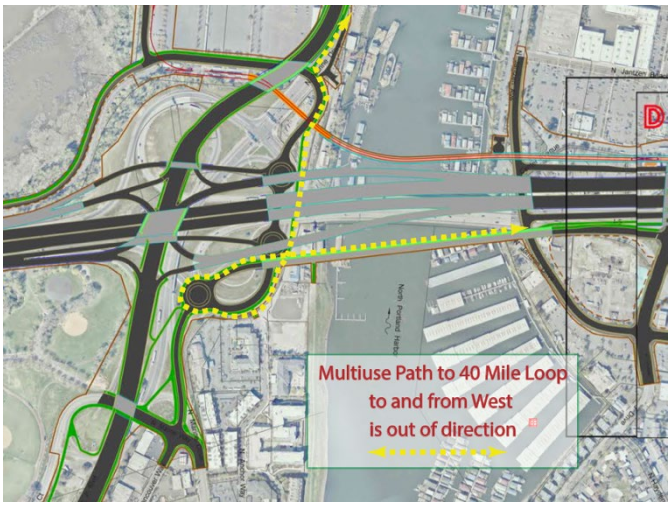
IBR Positive Contributions to the 40-Mile Loop Trail

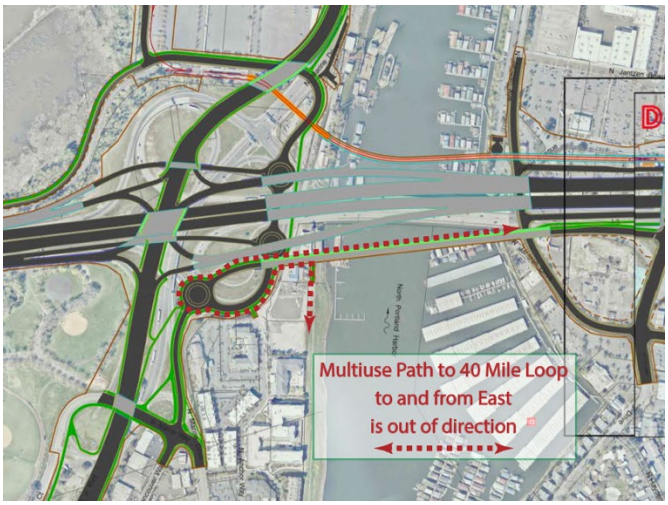
The IBR project will construct the segment of the 40-Mile Loop within the project area. This new trail segment will provide a safe, separated trail connecting the existing 40-Mile Loop trail located west of the proposed bridges through the project area, under the many new IBR bridges emanating from mainland Portland. After crossing under the local Harbor Bridge, the east most bridge proposed, the IBR will stub out the Trail to the East for a future connection to the Bridgeton Trails segment of the 40 Mile Loop. This is a good trail addition to the 40 Mile Loop and appreciated by the 40 Mile Loop Land Trust board.



Concerns with the Proposed Connection of 40 Mile Loop to the multiuse path on the local Harbor Bridge.

However, the proposed trail connections from the multiuse path on the local Harbor Bridge to the new 40-Mile Loop segment is not optimal. The proposed design requires users to travel out of their way, navigating a traffic circle and crossing vehicle lanes to reach both the eastbound and the westbound trail connection. This routing is neither convenient nor efficient and could discourage its use.





Request for Further Study of better East and West Connections to the 40 Mile Loop

We strongly recommend that alternative design options be considered to provide a more direct, connection to and from the east and west to the local Harbor Bridge multiuse path.

Possible additional study include:

1) Creating a direct connection from the East stub of the Bridgeton Trail to the sidewalk on the east side of the local Harbor Bridge. This direct connection would make it easier and more appealing for cyclists and pedestrians to cross the Harbor Bridge, while also offering a scenic route with views of North Portland Harbor and Mt Hood.
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Thank you,
Karen Waggoner

IBR Draft SEIS - RECORD #2524 DETAIL

First Name :	Karen
Last Name :	Waggoner
Attachments :	DSEIS-2524_Waggoner_Original.pdf (219 kb) Synergies_Need_to_be_Recognized__Studied.pdf (217 kb)

IBR Draft SEIS - RECORD #2524 DETAIL

Submission Date :	11/15/2024
First Name :	Karen
Last Name :	Waggoner
Business/Organization/Agency :	
Attachments :	Synergies Need to be Recognized & Studied.pdf (217 kb)

Submission Input :

Please study synergies between improvements by the IBR and other large public and private projects being constructed at the same time. This synergy coordinated by the Cities of Portland and Vancouver could create public amenities greater than any of the individual projects could provide on their own.

Karen Waggoner, [redacted]

[redacted]

Waggoner Family **November 15, 2024**

[redacted]

Re: Synergies Empowered by the IBR

Coordinate synergies between improvements by the IBR and other large public and private projects being constructed at the same time. This synergy coordinated by the Cities of Portland and Vancouver could create public amenities greater than any of the individual projects could provide on their own.

Example: **Create Bridgeton Trail Segment of the 40 Mile Loop**

1) IBR Road system requires acquisition of property in order to build the new Harbor Bridges. That property under the new bridges finally puts into public ownership a key missing trail segment of the 40 Mile Loop.
2) At the same time as the IBR, the Army Corp of Engineers is upgrading the adjacent levee. The improved levee will be higher in elevation and finished with a compacted gravel maintenance road.
3) That key trail segment is also located in an existing Portland urban renewal district. The urban renewal district has already designed the finished trail, amenities and connections to local walkways. The urban renewal district had set aside funds to do the finish work once the trail easements were acquired.
4) By completing this Trail segment, Hundreds of residential units in Bridgeton have a direct, protected and safe way to walk and roll to the Expo Light Rail Station. This enhances ridership numbers for the IBR Light Rail and FTA funding requests.

The City of Portland can coordinate these projects together. Work IBR is already planning to do can create a synergy that builds a key piece of Trail infrastructure greater than any one project could do on their own.

This is just one example of possible synergies empowered through the IBR.
There are other synergies for Hayden Island, Vancouver Waterfront and Historic Reserve.

Thank you,
Karen Waggoner

Waggoner Family
10 NE Bridgeton Road
Portland, OR 97211
karen.waggoner@comcast.net

November 15, 2024

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Thank you,
Karen Waggoner

IBR Draft SEIS - RECORD #2525 DETAIL

First Name :	Corinna
Last Name :	Kimball-Brown
Attachments :	DSEIS-2525_Kimball-Brown_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #2525 DETAIL

Submission Date : 11/15/2024
First Name : Corinna
Last Name : Kimball-Brown
Business/Organization/Agency :

Submission Input :

First Name:
Corinna

Last Name:
Kimball-Brown

[redacted]

[redacted]

[redacted]

[redacted]

Topic Area:
Transportation

Comment:
If our region is going to meet our climate goals and reduce congestion, the Interstate bridge replacement must be designed in a way that prioritizes the comfort and convenience of people taking transit, bicycling and walking. The multi-use path should extend to the northern limits of the project area and the project should include connections to low-stress bikeways on all sides. The path and light rail line should be on the same side of the bridge; it's very common for commuters to take their bikes on light rail. The bridge should be designed to anticipate increasing transit capacity in the future, not private vehicle capacity. The current design makes it clear that biking, walking, and transit were an after-thought.

JCA comment #: 412

IBR Draft SEIS - RECORD #2526 DETAIL

First Name :	Karen
Last Name :	Waggoner
Attachments :	DSEIS-2526_Waggoner_Original.pdf (829 kb) Separate_Freight__Bike_Travel.pdf (506 kb)

IBR Draft SEIS - RECORD #2526 DETAIL

Submission Date :	11/15/2024
First Name :	Karen
Last Name :	Waggoner
Business/Organization/Agency :	
Attachments :	Separate_Freight__Bike_Travel.pdf (506 kb) DSEIS-2526_Waggoner_Original.pdf (509 kb)

Submission Input :

One important purpose and need of the IBR is to improve highway freight mobility and address interstate travel and commerce needs in the Program area.

Additionally, the need is to improve connectivity, reliability, travel times, and operations of public transportation modal alternatives in the Program area.

Karen Waggoner, CMP, CMM

[redacted]

Waggoner Family **November 15, 2024**

[redacted]

Re: Separating Freight and Bike Travel on the Marine Drive Interchange and On-Ramps

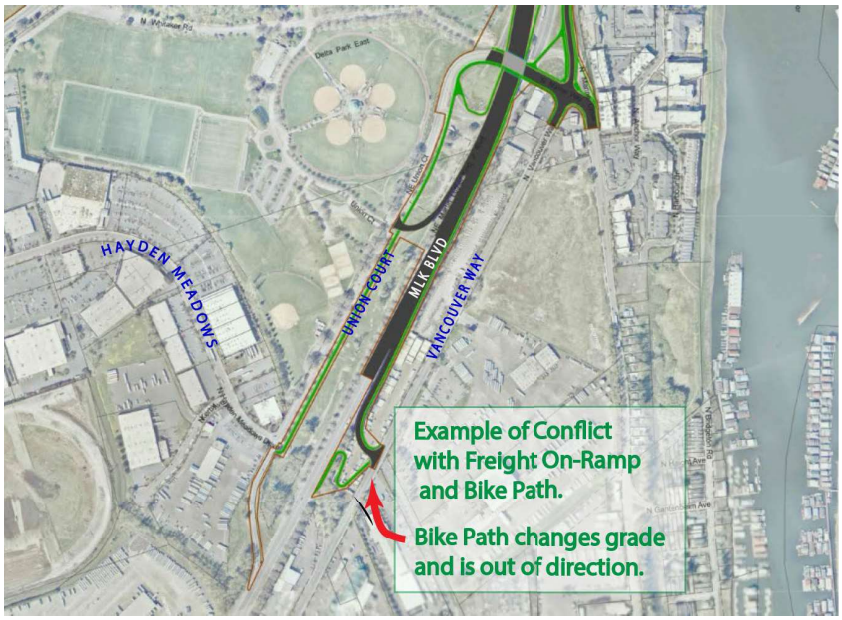
One important purpose and need of the IBR is to improve highway freight mobility and address interstate travel and commerce needs in the Program area.

Another important purpose and need is to improve connectivity, reliability, travel times, and operations of public transportation modal alternatives in the Program area.

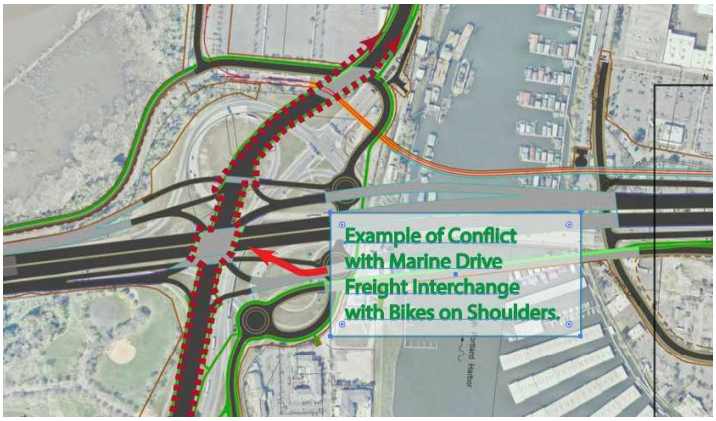
A way to meet the purpose and needs of both Freight Users and Active Transportation Users is to build active transportation routes physically separated from Freight routes as much as possible. Maximizing this separation is key to creating efficient Freight routes while creating safer, more attractive, and therefore more heavily used walking, rolling, and biking routes.

Examples of Conflicts between Freight and Active Transportation users.

The proposed IBR design for the ramp from Vancouver Way to MLK North poses significant conflict between Freight and Bikes, as the proposed Bike route travels changes grade along a switch back, crosses a major Freight intersection and climbs a grade up along a freight-heavy on-ramp.



Another example of possible Freight-Bike conflict is in the Marine Drive Interchange. Here IBR proposes to build a complete bike lanes and pedestrian sidewalk on both sides of the Interchange.



Even if the IBR is required by State Law to provide bike and pedestrian facilities on the Marine Drive interchange, we recommend additional study on improving two aspects of these improvements:

1) Any facilities for bike and ped that must be built on Marine Drive needs to be built in a way that separates bike and ped travel from Freight as much as possible using techniques such as barriers, and raised bike roadways.

2) To discourage any active transportation users from crossing the Marine Drive interchange, also build alternative routes that go around the Marine Drive Interchange rather than through the interchange. This separate bike ped system needs be so well design that it becomes the preferred route. Current IBR design has the MLK active user connection provided partially along MLK shoulders and partially on separated trails. To become the preferred route, an active transportation route that is not reliant of MLK shoulders need to be developed. This separated preferred corridor needs to conveniently link to each of the existing regional bike corridors.

Complete separation creates safety for both the people that are walking, biking and rolling in this area, but also makes it safer and more efficient for Freight Users who don't have to worry about negotiating on ramps with curves and with grade changes while watching out for bike users traveling the exact same routes.

This separation better meets 3 parts of the purpose and needs statement of the IBR; (a) improve travel safety and traffic operations on the I-5 river crossing and associated interchanges; (b) improve connectivity, reliability, travel times, and operations of public transportation modal alternatives in the Program area; (c) improve highway freight mobility and address interstate travel and commerce needs in the Program area.

Given the Marine Drive interchange is usually described as the **most heavily used Freight corridor in Oregon**, we encourage the IBR to work with the Active Transportation Users in combination with the Freight Users **together rather than separately** to refine designs that efficiently moves Freight Users through the Marine Drive Interchange and Active Transportation Users around the Interchange.

Thank you,
Karen Waggoner

Waggoner Family
10 NE Bridgeton Road
Portland, OR 97211
karen.waggoner@comcast.net

November 15, 2024

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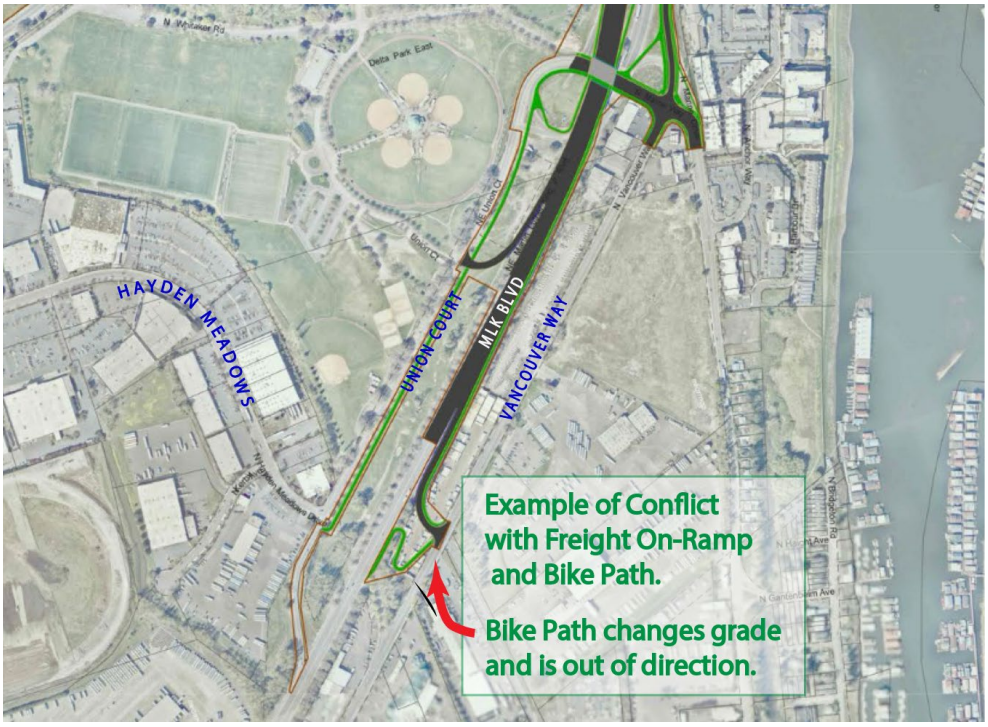

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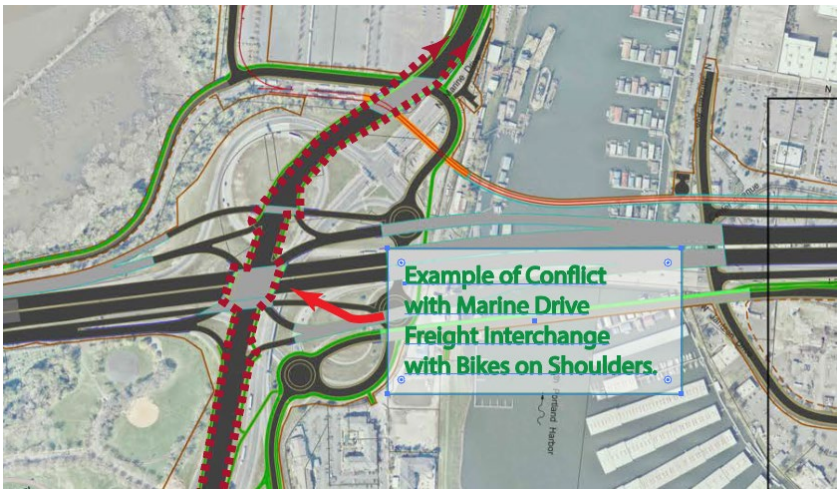

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Thank you,
Karen Waggoner

IBR Draft SEIS - RECORD #2527 DETAIL

First Name :	Karen
Last Name :	Waggoner
Attachments :	DSEIS-2527_Waggoner_Original.pdf (382 kb) MLK_Undercrossing.pdf (380 kb)

IBR Draft SEIS - RECORD #2527 DETAIL

Submission Date :	11/15/2024
First Name :	Karen
Last Name :	Waggoner
Business/Organization/Agency :	
Attachments :	MLK Undercrossing.pdf (380 kb)

Submission Input :

Problems with the proposed MLK ramp design need to be studied.

Karen Waggoner, [redacted]

[redacted]

Waggoner Family **November 15, 2024**

[redacted]

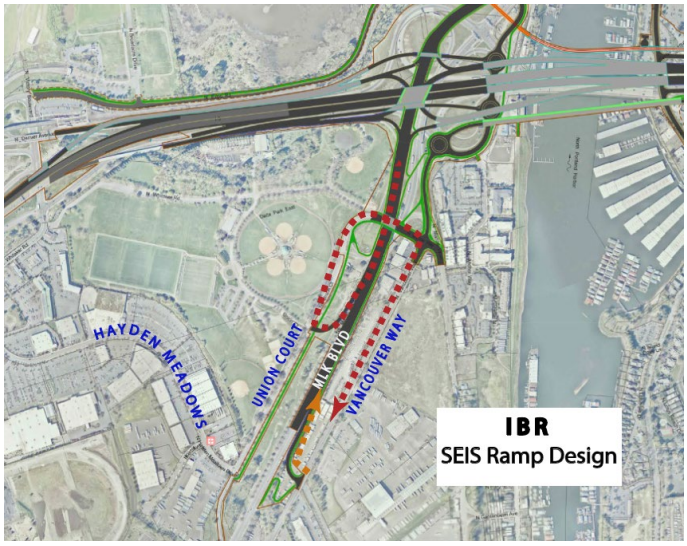
Re: The MLK Undercrossing and Interchange to Address Freight & Neighborhood Access Ramps for the IBR

Initial Proposed Design for MLK Access Ramps.

The Interstate Bridge Replacement (IBR) proposes a Martin Luther King (MLK) on-ramp and off-ramp design that meets very minimal requirements:

1) These ramps replace the existing ramp connections.
2) These ramps merge vehicles onto MLK further away from the Marine Drive single point intersection improving the merge/weave problems with the current intersection.

This minimal ramp design does not excel with other important goals for Portland including efficient regional freight movement, recreational park safety and understandable way finding.



Problems with the proposed MLK ramp design

1) The proposed ramp design creates out of direction travel.
2) The proposed design is confusing to navigate. A traveler will take the off-ramp to leave the Marine Drive / MLK interchange, but not clearly see how to get back onto the Marine Drive / MLK interchange. There is the same way finding confusion in reverse
3) The proposed MLK off-ramp conflicts with Delta Park's primary recreational entrance. Since this a major Freight travel ramp, this ramp should not conflict with the major access to a major recreational area.
4) The proposed MLK ramp encourages Freight movement to use East Marine Drive for access when the Freight Master plan wants freight travel to use Columbia Blvd to MLK for Freight Access rather than East Marine Drive which is a local neighborhood roadway.

Proposal - MLK Undercrossing and Complete Intersection
There is a better design to meet all of IBR requirements while also meeting broader Portland Freight, Neighborhood and Parks planning goals.

This new ramp design proposes an undercrossing under MLK connecting Hayden Meadows Drive to Vancouver Way. This new MLK undercrossing combined with slightly relocated MLK on-ramps and off-ramps has the following advantages:

1) The Complete MLK Intersection minimizes out of direction travel.
2) The complete MLK intersection removes Freight users from the main Delta Park Entrance.
3) This design would be easier to navigate. It is more understandable for Freight and other users just how to get on and off MLK and the access the Marine Drive Interchange.
4) The new undercrossing meets the purpose and need of the IBR : (a) improve travel safety and traffic operations on the I-5 river crossing **and associated interchanges**; (c) **improve highway freight mobility** and address interstate travel and commerce needs in the Program. The MLK Undercrossing designs meets the purpose and needs better than the minimal IBR ramp design.
5) Lastly the MLK undercrossing provides a new way to access the Hayden Meadows Drive commercial shopping area. This new access could help off-set the removal of the direct access to Hayden Meadows that exist today from the current Marine Drive intersection to I-5 South to Interstate Ave off ramp. This existing off ramp connection from Marine Drive south bound on-ramp to Interstate Ave was removed to provide for the new Braided Ramp from Marine Drive to I-5. This Interstate Ave ramp connection from I-5 still exits if someone is on the main line of I-5. However Marine Drive travelers on the local Portland system wanting to access Interstate Ave in the IBR proposed design would have to travel through the three new Marine Drive traffic circles, then to Expo Road then connect to Interstate Ave. The MLK undercrossing design would create another more direct way to get to Hayden Meadows Drive and Interstate Ave.

IBR's Response to building the MLK Undercrossing

Have Portland Fund This – Not the IBR
This undercrossing has been proposed to the IBR early in the design process. IBR has stated that a MLK undercrossing might be nice to have but that the undercrossing should be something that City of Portland funds later.

A complete MLK Undercrossing and ramp design is more appropriate to be included in the IBR funding package. This undercrossing improves Freight connections for this intersection described as Oregon's Most Important Freight Interchange. The MLK Undercrossing excels at meeting the IBR purpose and need (c) **improve highway freight mobility**.

Rather than the IBR build a minimally acceptable ramp design and suggest the local city come back later and rebuild the preferred connection is not good public policy. The cost of the undercrossing would be an exceptionally large funding request for Portland. The Undercrossing is more appropriate to be funded in the budget for a project that describes itself as building a bridge to meet the needs for the next 100 years.

Please study the MLK undercrossing and full interchange design. Involve the Freight Community, the local residents, Portland Transportation and Portland Parks. Let's work together to refine a ramp and undercrossing design that excels at meeting section C of the purpose and need of the IBR to improve freight mobility.

Thank you,
Karen Wagoner

Waggoner Family
10 NE Bridgeton Road
Portland, OR 97211
karen.waggoner@comcast.net

November 15, 2024

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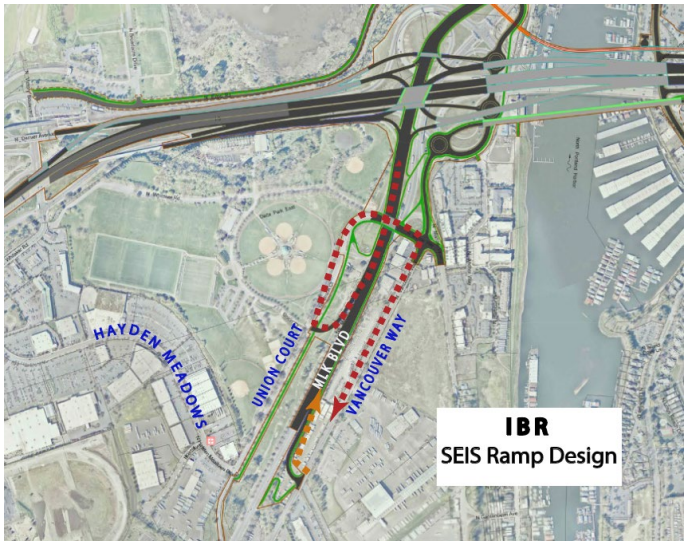

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Thank you,
Karen Wagoner

IBR Draft SEIS - RECORD #2528 DETAIL

First Name :	Karen
Last Name :	Waggoner
Attachments :	DSEIS-2528_Waggoner_Original.pdf (207 kb) Marine_Drive_Bike_Lane_Conflict.pdf (206 kb)

IBR Draft SEIS - RECORD #2528 DETAIL

Submission Date :	11/15/2024
First Name :	Karen
Last Name :	Waggoner
Business/Organization/Agency :	
Attachments :	Marine Drive Bike Lane Conflict.pdf (206 kb)

Submission Input :

The IBR proposed design for Bike lanes through the Marine Drive Single Point Interchange presents a major conflict between bike and Freight movements. As the Marine Drive interchange is considered to one of the most important freight Interchanges in the State of Oregon, we request that these pathways for active transportation be built separated from freight movements to provide safe passage for active transportation users.

Karen Waggoner, [redacted]

[redacted]

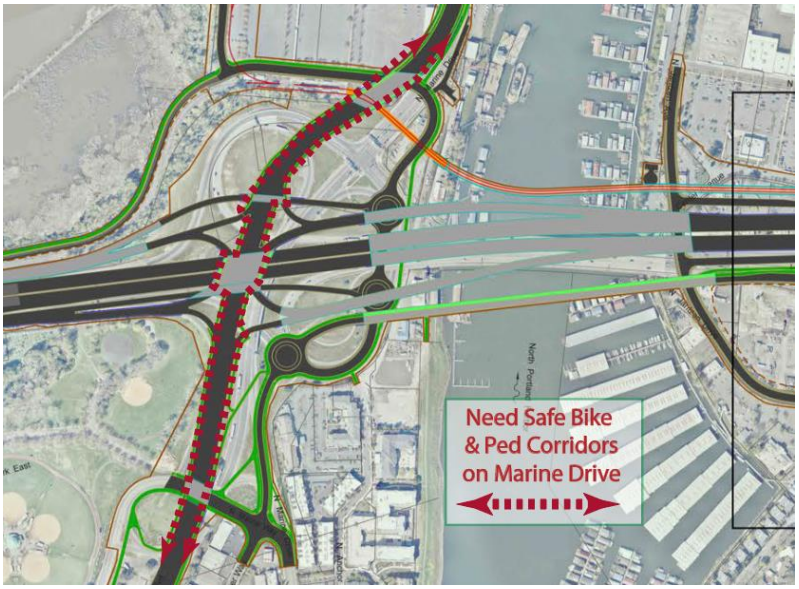
Waggoner Family
10 NE Bridgeton Road
Portland, OR 97211
karen.waggoner@comcast.net

November 15, 2024

Re: Comments on Freight and Bike Concerns on the Marine Drive Single Point Interchange

The IBR proposed design for Bike lanes through the Marine Drive Single Point Interchange presents a major conflict between bike and Freight movements. As the Marine Drive interchange is considered to one of the most important Freight Interchanges in the State of Oregon, we request that these pathways for active transportation be built separated from Freight movements to provide safe passage for active transportation users.

This meets the purpose and needs of the IBR to (b) improve connectivity, reliability, travel times, and operations of public transportation modal alternatives in the Program area and(c) improve highway freight mobility and address interstate travel and commerce needs in the Program area.



Please study how these corridors could be built separate from the vehicle travel lanes using barriers or raised active transportation pathways. In addition, the IBR should study how to use the new technologies of sensors that detect active transportation user approaching intersections crossings. These advanced sensors triggers traffic signals, so that users crossing through many these intersections does not have to individually press a button at each crossing and wait for the signal to change one crossing at a time.

Thank you,

Karen Waggoner

Waggoner Family
10 NE Bridgeton Road
Portland, OR 97211
karen.waggoner@comcast.net

November 15, 2024

Re: Comments on Freight and Bike Concerns on the Marine Drive Single Point Interchange

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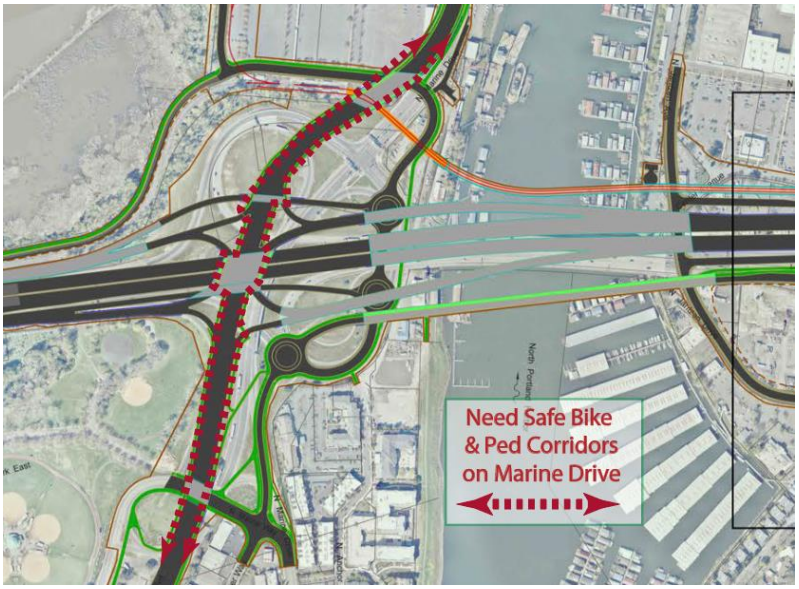

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Thank you,

Karen Waggoner

IBR Draft SEIS - RECORD #2529 DETAIL

First Name :	Karen
Last Name :	Waggoner
Attachments :	DSEIS-2529_Waggoner_Original.pdf (486 kb) Bridge_Style.pdf (169 kb) Bridge_Style.pdf (169 kb)

IBR Draft SEIS - RECORD #2529 DETAIL

Submission Date :	11/15/2024
First Name :	Karen
Last Name :	Waggoner
Business/Organization/Agency :	
Attachments :	Bridge Style.pdf (169 kb)

Submission Input :

We believe the aesthetics of these bridges matter. The architectural style of the bridges creates a gateway to both Oregon and Washington. The view of the bridges from the Vancouver shoreline and Hayden Island are important to the future developments in those areas.

Karen Waggoner, [redacted]

[redacted]

Waggoner Family **November 15, 2024**

[redacted]

Re: Architectural Design of the new Bridges

We believe the aesthetics of these bridges matter, and that they are an important inspiration that helps move the project forward. The architectural style of the bridges creates a gateway to both Oregon and Washington. The view of the bridges from the Vancouver shoreline and Hayden Island are important to the future developments in those areas.

We request that once the bridge configuration is determined the IBR hold a public process on the final architectural design of not only the main bridges but the entire bridge corridor. This process could be modeled after similar processes that Portland has done in the past for Tilikum Crossing and the new Burnside Bridge. Both of these processes were led by National Design Experts in collaboration with Local Design Experts, the project engineers and members of the public to recommend a final bridge architecture to the region's leaders.

Should the IBR select the stack bridges as the best option, that bridge structure, even though it is a basic truss, can be executed with finesse. Remember the bridges crossing North Portland Harbor could have architectural significance as well. Imagine driving over the Harbor between twin cable-stayed bridges on each side, one beautiful structure holding up the light rail bridge, and its twin holding up the local Harbor bridge.

Even a flat bridge can have architectural significance. How the constraints of the project are resolved in the hands of a talented Bridge Architect become the Bridge's unique beauty.

The region is investing a lot into these bridges that will be part of our environment for a long time. Let's build something we are proud to leave to our children and our children's children.

Thank you,

Karen Waggoner

Waggoner Family
10 NE Bridgeton Road
Portland, OR 97211
karen.waggoner@comcast.net

November 15, 2024

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November 15, 2024

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Should the IBR select the stack bridges as the best option, that bridge structure, even though it is a basic truss, can be executed with finesse. Remember the bridges crossing North Portland Harbor could have architectural significance as well. Imagine driving over the Harbor between twin cable-stayed bridges on each side, one beautiful structure holding up the light rail bridge, and its twin holding up the local Harbor bridge.

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Thank you,

Karen Waggoner

IBR Draft SEIS - RECORD #2530 DETAIL

First Name :	Francie
Last Name :	Royce
Attachments :	DSEIS-2530_Royce_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #2530 DETAIL

Submission Date : 11/15/2024
First Name : Francie
Last Name : Royce
Business/Organization/Agency :

Submission Input :

First Name:
Francie

Last Name:
Royce

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

Topic Area:
Transportation

Comment:
If the Interstate Bridge is ever built, the pedestrian/bike infrastructure must be improved significantly from the current design of a 100' separation in elevation from the path to the MAX station to be built. As a 76 year active bike rider, I would find the cork screw ramp to gain 100' in elevation daunting if not impossible to ride. It is very important to think about how to integrate the pedestrians and bike riders from the bridge path into use of MAX.

JCA comment #: 411

IBR Draft SEIS - RECORD #2531 DETAIL

First Name :	Emily
Last Name :	Stebbins
Attachments :	DSEIS-2531_Stebbins_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #2531 DETAIL

Submission Date : 11/15/2024
First Name : Emily
Last Name : Stebbins
Business/Organization/Agency :

Submission Input :

First Name:
Emily

Last Name:
Stebbins

[redacted]

[redacted]

[redacted]

[redacted]

Topic Area:
Induced Demand

Comment:
As a parent and an educator, I am deeply invested in working towards a healthy, livable planet for my child and my students. While I understand the need for seismic upgrades and a safe way to cross the river, I don't believe that we should be spending public resources on building new infrastructure that will increase emissions. I am concerned about adding lanes that would encourage more people to drive. Induced demand is a major concern — it is heartbreaking to think that, in trying to reduce congestion, we would instead multiply it.

Instead, it is critical that transit be convenient, that connections are realistic, and that people be able to move freely between public transit and active transportation. I would love to be able to visit my cousins in Vancouver without driving, but instead I rarely see them because it feels like such a journey. If there was fast, convenient

public transit, we could see each other more often. I could take my kid across the Columbia on a summer day to go swim in the Washougal. Please center public health and climate justice in building a bridge that is accessible through active and public transit. Make more space not for cars, but for people!

JCA comment #: 410

IBR Draft SEIS - RECORD #2532 DETAIL

First Name :	Eleanor
Last Name :	Greene
Attachments :	DSEIS-2532_Greene_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #2532 DETAIL

Submission Date : 11/15/2024
First Name : Eleanor
Last Name : Greene
Business/Organization/Agency :

Submission Input :

First Name:
Eleanor

Last Name:
Greene

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

Topic Area:
Transportation

Comment:
I am a NE Portlander who travels to Vancouver twice per week, during rush hour once. I would love to see a mode of transit where I could take my bicycle and/or train to get there. It is important to add side-by-side transit options to make it easy for me to do both-- it would be such a relief to not have to deal with car traffic and be able to move seamlessly from bike to transit and back to bike. Although I have a car and have that option, there are those who do not and this would be a boon to economic justice for communities who don't have cars and

need an affordable way to travel between cities. Please make our cities connected and safe by bike and transit.

JCA comment #: 409

IBR Draft SEIS - RECORD #2533 DETAIL

First Name :	Jeffrey
Last Name :	Yasskin
Attachments :	DSEIS-2533_Yasskin_Original.pdf (6 kb)

IBR Draft SEIS - RECORD #2533 DETAIL

Submission Date : 11/15/2024
First Name : Jeffrey
Last Name : Yasskin
Business/Organization/Agency :

Submission Input :

First Name:
Jeffrey

Last Name:
Yasskin

[redacted]

[redacted]

[redacted]

[redacted]

Topic Area:
Transportation

Comment:
Instead of spending billions of dollars to fail to manage congestion, the departments of transportation should be working on congestion pricing and increased public transit to move people toward more efficient modes of transportation. Please listen to the Just Crossing Alliance's recommendations, and don't waste our money on this boondoggle.

JCA comment #: 408

IBR Draft SEIS - RECORD #2534 DETAIL

First Name :	Chris
Last Name :	Smith
Attachments :	DSEIS-2534_Smith_Original.pdf (19 kb)

IBR Draft SEIS - RECORD #2534 DETAIL

Submission Date : 11/15/2024
First Name : Chris
Last Name : Smith
Business/Organization/Agency :

Submission Input :

First Name:
Chris

Last Name:
Smith

Business or Organization:
personal comment

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

Topic Area:
Induced Demand

Comment:
The DSEIS itself includes no discussion of induced demand (topic not found in index).

The Transportation Technical report has some discussion of “induced development” (i.e., land use changes) increasing travel demand (based largely on a 14-year-old memo from Metro in Attachment G) but ultimately concludes that land use plans already anticipate completion of the project (p. 6-1).
There are multiple mechanisms behind induced demand that are included nowhere in the DSEIS.
What follows is the transcript of a November 8th, 2024 "Science Friday" podcast in which author Megan Kimble discussed impacts of highway expansion including induced demand.

Segment Transcript
IRA FLATOW: This is Science Friday. I’m Ira Flatow. Have you ever been stuck in traffic? Well, maybe you are right now, and you had the thought, if only this highway was a little wider so it could fit more cars. Well, you aren’t alone because many states have been expanding their highways across the country for decades.

New York Governor Kathy Hochul recently announced a $1.3 billion project to expand one of the state’s highways for a whopping six-minute travel savings. Other widening projects are underway in states, including Texas, California, and Maryland. In 2022, federal, state, and local governments in the US spent $127 billion on highway construction. These DOTs say expanding highways is necessary to reduce congestion, especially in areas with growing populations and to encourage economic development.

But you know what? Decades of research shows the opposite effect. When highways are expanded, the travel time actually increases. When more lanes are added, people just clog up the new ones. So how does this happen? And why do we keep expanding highways, even though the research says it doesn’t work? Here to explain the science behind highway widening and how some states are actually rethinking their approach to traffic is Megan Kimble. She’s a journalist and author of the book City Limits, Infrastructure Inequality and the Future of America’s Highways. She’s based in Austin, Texas. Welcome to Science Friday.

MEGAN KIMBLE: Thank you for having me.

IRA FLATOW: Lots of highways in Austin, right?

MEGAN KIMBLE: Lots of highways. I’m one mile from I-35 right now.

IRA FLATOW: Well, let’s get to the point. It does seem logical that if you want less congestion, you just widen the road. But that the data shows that widening actually makes traffic worse, right?

MEGAN KIMBLE: Yeah, it’s certainly intuitive. Like you said, if you’re sitting on a highway in traffic, you think, one more lane will get this traffic flowing more quickly. But yeah, it’s actually been well understood for decades that when you add capacity to a highway in the form of new lanes, more cars will rush to fill up that capacity. So that was first articulated in 1962. So just a few years after the interstate highway program began, an economist looked at all these new highways that were being built in American cities and saw that as lanes were added, as capacity was added, the total traffic was increasing.

And this is because travel is a good like any other. It follows the rules of supply and demand. So when you increase supply, demand also increases. So people change their behavior. They maybe move farther from their job and they take on a longer commute because they think they can get there quicker, or they take more

discretionary trips, so they go to the grocery store three times, instead of one time. And overall, traffic volumes increase. So the sort stated goal of fixing traffic congestion by adding lanes fails. In project after project, city after city, when highway departments widen, highway travel times actually increase.

IRA FLATOW: But states are also talking about climate goals. We're going to reduce smog and pollution and greenhouse gases. But more cars are just the opposite. When you widen the highways, you're having an environmental impact.

MEGAN KIMBLE: Yeah, you're measurably increasing greenhouse gas emissions. A stat I found when I was reporting my book that absolutely floored me is that on-road emissions in Texas, so the emissions generated by our cars and trucks, account for half a percentage of total worldwide carbon dioxide emissions. So like the highway expansions that I profile in my book, whether those go forward will have a measurable impact on global climate emissions. Every one of these highway expansions contributes to that number.

There's been a lot of research lately that shows that highway widenings are the number one lever for states to pull to either reduce or increase their greenhouse gas emissions. So you have a lot of governors saying, we are committing to ambitious climate goals. And then their state DOT are funding highway widenings.

IRA FLATOW: Can you point to any benefits of highway expansion?

MEGAN KIMBLE: You certainly can allow more cars on the highway. So you do, in fact, increase the total number of people that can drive on a road. If you expand something from two to four lanes, more cars fit on that road. But I think the question is, do we want to encourage driving? Do we want our public policy decisions and public funding to be spent in such a way that it encourages people to drive?

So the highways enabled the growth of the suburbs. They allowed people to buy more affordable housing out in the fringes of cities because they promised speedy access back to job centers and schools. But what is often not factored in is that has come at an enormous cost. So there is certainly a benefit in the sense of it has allowed kind of cheaper housing. But when you combine housing and transportation, when you factor in the cost of gas and car insurance and the externalities of greenhouse gas emissions, it actually is not so cheap anymore.

IRA FLATOW: Yeah, and these highways are also pretty expensive to maintain, right?

MEGAN KIMBLE: They're expensive to build and they're expensive to maintain. Yeah. I started reporting this book because I learned that the state of Texas had allocated $60 billion– that's billion with a B– to expand highways in five major Texas cities. It's an extraordinary amount of money to be spent, as we started talking about not actually solving the problem we set out to solve.

IRA FLATOW: Yeah, and you point out in the early days of thoughts about highway expansion that when it was studied, there were even recommendations that the money would better be spent on public transportation.

MEGAN KIMBLE: Yeah. This is one of my favorite stories that I encountered while reporting my book. So when Eisenhower sold Congress on the interstate highway program, he promised it as one of national defense, so it

was going to connect the country in the case of an atomic bomb or nuclear attack, and also build economic prosperity, that we are going to enable trade across this vast nation of ours. So it very much was a program to connect the country.

And what the interstate highway program did is it enabled $25 billion, the largest public works project ever attempted in American history, and the federal government would pay 90% of the cost of construction of these interstate highways. And so the money flowed directly to state departments of transportation, which were called Highway Departments with essentially no oversight by the federal government.

And so what states started doing because they had lots of money flowing into their coffers and people were buying cars in record numbers, is they started building massive highways in the middle of cities. And so they started trying to use that federal money to solve this sort of local problem of urban congestion.

IRA FLATOW: Yeah, that's not what Eisenhower wanted it for, right?

MEGAN KIMBLE: Yeah, that's not what Eisenhower intended. And we know that because he appointed this guy, John S Bragdon, as a special assistant to the president to oversee the implementation of the interstate highway program. And Bragdon looked into the matter a few years after the program passed and found that it was running significantly over budget, and it was running over budget because states were using this federal money to build urban highways, which are much more expensive to build than rural ones.

And so he asked Congress, was that your intent of the program, was to solve this problem of local congestion? And he presents his findings to Eisenhower in the spring of 1960. And it's a really remarkable presentation. I found the actual note cards in the Eisenhower Presidential Library of the text that Bragdon presented to Eisenhower. And in it, he says, practically all the experts on the traffic problem of cities agree that the way to solve urban congestion, rush hour congestion, is through transit. People take up less space than cars. And urban transit is the solution.

But what cities are doing currently is they are using this federal money through the interstate highway program to rip out existing transit systems and build massive highways in their place. And Eisenhower responds, and he agrees. He says those who had implemented the project, the program in this way, had done so against his wishes. He had never intended these massive highways to be built through the center of cities.

IRA FLATOW: And when they started ripping out places to build these highways, the demographics were not quite equal for Black and white, were they?

MEGAN KIMBLE: No. This coincided with the era of urban renewal, in which city planners were looking at, quote, unquote, "blighted neighborhoods" predominantly occupied by Black and Hispanic families, neighborhoods that had been blighted by the same federal government a couple of decades earlier through the practice of redlining. And they saw an opportunity to clear those neighborhoods.

So it's very clear in the historic record that planners intentionally routed interstate highways through Black and Hispanic neighborhoods and displaced half a million people from their homes along the way. And so it very much had a disproportionate impact on those neighborhoods. And that impact is still being felt today. People

who live next to highways suffer higher rates of respiratory diseases. And those are still mostly communities of color.

IRA FLATOW: And as you say, specifically in Texas– and I didn't know they have the largest highway in the country, 26-lane Katy Freeway in Houston?

MEGAN KIMBLE: Yeah, the Katy Freeway is like the textbook example of induced demand. It's 26 lanes, including frontage roads. It is this massive highway. And TxDOT expanded it about a decade ago. And within five years, rush hour travel times got worse. And people in Houston drive on that highway. They understand that. I was really struck reporting my book. I went door to door with a lot of activists who were trying to stop a different highway expansion. And people in Houston understand the phenomenon of induced demand. They don't necessarily call it that. But when you live in a place that is covered by highways and you still sit in crushing traffic, you might wonder, why do we keep doing this?

IRA FLATOW: Yeah. And let's talk about that. You wrote about the efforts of anti-highway expansion groups in Texas, and there were some successes.

MEGAN KIMBLE: Yeah, so a group in Houston called Stop TxDOT I-45 started going door to door to stop this massive highway expansion. It's called– locals call it the I-45 expansion, but it actually impacts three interstate highways and will rebuild and reroute the entire downtown loop in Houston, along the way, displacing 1,200 people from their homes, consuming 450 acres of land. And it's currently an $11 billion project. And a lot of the people who are in the footprint of the expansion didn't know that their homes would be taken. They didn't know they had any way to fight back. The authority of eminent domain is absolute. TxDOT can say, hey, we want your home, and all they can do is negotiate on the price.

But this group of just volunteers started going door to door in those neighborhoods impacted by the expansion, saying, hey, do you want this? Hey, do you know that you can say– you know that you can voice your opposition. TxDOT's own analysis found that the people impacted by this highway expansion were predominantly minority. And so a few of those people filed civil rights complaints, saying this project violates Title VI of the Civil Rights Act because it disproportionately impacts Black and Hispanic people.

And as a result, the federal government actually, under Pete Buttigieg, intervened to pause that project. So they said, hey, TxDOT, we need you to stop work on this project while we investigate these serious civil rights complaints. And those were filed just by normal people, people who I spoke with, who live in the footprint of the expansion, and said, hey, this isn't fair. This is unjust.

IRA FLATOW: Wow. And this is happening in cities across the country, people fighting back, and cities, some of them, actually taking down their highways.

MEGAN KIMBLE: Yeah. There's this kind of new resurgence of freeway revolts, which people might remember in the 1960s, there was this massive resistance to highway construction. As these highways came into American cities, tens of thousands of people poured into the streets and said, we don't want this. And they stopped highways from being built, in Baltimore and Portland and Seattle. Across the country, there were really successful examples of freeway revolts. And there is this sort of burgeoning movement today of this new

generation of freeway fighters, many of whom are galvanized by climate, who see the climate impacts of these highway expansions. And they're really trying to stop highway expansion across the country.

IRA FLATOW: And you've mentioned in your book that there are cities that are actually taking down their highways. What cities are those?

MEGAN KIMBLE: Yeah, about 18 cities across North America have either taken down highways or committed to doing so. So one of the ones I profiled in the book is the city of Rochester, New York, which had this inner loop highway circling its downtown, this kind of moat, this sunken highway, that really cut off downtown from the surrounding neighborhoods. And that highway enabled people to actually leave the central business district. And so the downtown had been kind of hollowed out.

And starting about two decades ago, city leaders started talking about, what if we just took that highway away? What if we removed it? And in 2017, the city got a grant from the Obama administration, and they filled in the inner loop highway. They brought it up to grade. And they made a two-lane city street in its place, built this really wide, beautiful sidewalk and bike lane. So there are now apartments built on land that used to be a highway.

Most of those apartments are rented to families earning below the median income, three or four story buildings, and it's pretty remarkable to go walk. You can see part of the inner loop highway remains. The city of Rochester is in the process of actually filling in the rest of it now. But you can go today and see this sunken highway and then walk two blocks and see a neighborhood, a city. It's populated. People are walking. They're riding their bikes. There's a brewery right there. And it's really remarkable to see, we can reclaim that space.

I think a lot of people, myself included, I've only ever grown up in cities wrapped by highways. It's very hard to imagine them gone. It's hard to imagine anything different. But a lot of cities are tearing down highways and building something else in their place. And that can happen over five years. That can happen very quickly.

IRA FLATOW: And Colorado is actually taking a different approach, right? What are they doing?

MEGAN KIMBLE: Yeah, so that really shows how this is a climate story. So Coloradans elected a Governor Jared Polis, who made climate a top priority of his administration, and the legislature, passed a bill requiring all state agencies to make a plan to reduce greenhouse gas emissions by 90% by 2050. And so the Colorado DOT looked at its portfolio of projects, which included widening I-25 through the heart of Denver, and said, hey, we can't actually widen this highway and meet our greenhouse gas targets.

And so they took that widening off the books. They said, we're not going to do this, and we're going to allocate that money to something else. And that something else is bus rapid transit. So basically, we're going to help build a more robust transit system in Denver so that people can ride the bus, which lowers greenhouse gas emissions, and get people where they're going without a car. And that is a really remarkable example of climate policy dictating transportation funding.

IRA FLATOW: Very interesting. You've been reporting on this issue for a long time. You've written the book City Limits. What's your biggest takeaway on this topic after all of these years?

MEGAN KIMBLE: Yeah. I started reporting the book with kind of the same question that you have in this program, which is, if widening highways doesn't work to fix traffic, why are we still spending billions of dollars to widen highways? And the answer I have come to after four years of reporting is that there is this persistent belief in the US that cars help create prosperity, that cars enable economic development, and that without a car, our economy will collapse.

And so many other countries disprove that. Lots of cities in the US disprove that. There's so many different ways to tilt at that narrative. But that is this persistent belief from politicians of both parties, that cars create prosperity. And until we counter that, we're going to keep making the same mistakes.

IRA FLATOW: Do you think that might be changing? Are people thinking differently, starting to look at highways in their neighborhoods in a different way?

MEGAN KIMBLE: Yeah, absolutely. I mean, like I said, it's definitely becoming a climate fight. People are realizing that widening highways is only increasing our emissions, but I think it's also becoming a quality of life fight. Young people don't want to drive. They want to live in places that are walkable. They want to not spend the money on cars. A car is often the largest share of a household's disposable income after housing. And so people don't want to spend the money, and they don't want to spend the time driving. So I think there is a real shift, particularly as younger generations move into the housing market. They don't want to just live in the suburbs and drive everywhere they have to go.

IRA FLATOW: Yeah, this is a fascinating book, Megan. As someone who loves to read about highways and traffic and stuff, you've done a wonderful job here explaining the whole thing to us, especially the history of it, which is fascinating itself. Thank you very much for taking the time to be with us today.

MEGAN KIMBLE: Oh, thank you, Ira. Thanks for having me.

IRA FLATOW: Megan Kimble, journalist and author of the book City Limits, Infrastructure Inequality and the Future of America's Highways. And you can read an excerpt from that book on our website, sciencefriday.com/highways.

JCA comment #: 407

IBR Draft SEIS - RECORD #2535 DETAIL

First Name :	Celeste
Last Name :	Baskett
Attachments :	DSEIS-2535_Baskett_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #2535 DETAIL

Submission Date : 11/15/2024
First Name : Celeste
Last Name : Baskett
Business/Organization/Agency :

Submission Input :

First Name:
Celeste

Last Name:
Baskett

[redacted]

Topic Area:
Transportation

Comment:
I live in Portland and I ride my bike frequently and I use the bus and MAX as well. I hope that pedestrian and

bicycle and mass transit will be a key feature of the new design. Especially as e-bike use grows, more people will be able to commute farther by bike, such as between Portland and Vancouver. Bikes and mass transit are a better long-term solution to traffic congestion than increasing road widths, which does not have a long term impact on traffic congestion. Thank you!

JCA comment #: 406

IBR Draft SEIS - RECORD #2536 DETAIL

First Name :	Donna
Last Name :	Murdock
Attachments :	DSEIS-2536_Murdock_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #2536 DETAIL

Submission Date : 11/15/2024
First Name : Donna
Last Name : Murdock
Business/Organization/Agency :

Submission Input :

First Name:
Donna

Last Name:
Murdock

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

Topic Area:
Climate Change

Comment:
As a resident of Multnomah County, I urge project planners to reconsider expansion and instead focus on a simple bridge replacement that would improve user experience for public transit and active transportation. This would put the project in line with the OCFEC and with Metro's 2023 Regional Transportation Plan to reduce per capita VMT by 31% by 2045. It would also reduce the cost of this project and help protect adjacent communities and our river from dangerous air, water, and noise pollution. Right-sizing it would help ensure we

meet our climate goals and ensure that our region has a more sustainable future.

JCA comment #: 405

IBR Draft SEIS - RECORD #2537 DETAIL

First Name :	Kristin
Last Name :	Wray
Attachments :	DSEIS-2537_Wray_Original.pdf (6 kb)

IBR Draft SEIS - RECORD #2537 DETAIL

Submission Date : 11/15/2024
First Name : Kristin
Last Name : Wray
Business/Organization/Agency :

Submission Input :

First Name:
Kristin

Last Name:
Wray

[redacted]

[redacted]

[redacted]

[redacted]

Topic Area:
Transportation

Comment:
I am writing to demand that the IBR promotes infrastructure that ties communities together and invests in a brighter, cleaner, safer future. This means reducing the freeway component of the project but includes the seismic replacement, light rail extension and bike and pedestrian improvements. No freeway expansion!

JCA comment #: 401

IBR Draft SEIS - RECORD #2538 DETAIL

First Name :	Glenn
Last Name :	Grossman
Attachments :	DSEIS-2538_Grossman_Original.pdf (3 kb)

IBR Draft SEIS - RECORD #2538 DETAIL

Submission Date :	11/18/2024
First Name :	Glenn
Last Name :	Grossman
Business/Organization/Agency :	Shumway IBRP Action Group

Submission Input :

Shumway IBRP Action Group - Concerns About and Suggestions Regarding the Interstate Bridge Replacement Project

The Interstate Bridge Replacement project construction plans and post-construction operation will have impacts on Vancouver's Shumway Neighborhood, including vibration, audible, visual and air quality impact. Neighborhood residents look forward to working with project officials, staff, and consultants to determine ways to mitigate the negative impacts. The Shumway IBRP Action Group submits the following comments.

Neighborhood concerns include:

Auditory, visual, and air quality impacts on single and multi-family residential units, commercial properties, and Shumway Neighborhood. To mitigate adverse impacts, the Shumway IBRP Action Group will advise project planners on sound wall construction, height, and aesthetics.

Trees will be planted in the neighborhood and adjacent areas to mitigate near-road air quality issues. They will be planted as soon as the remaining construction will not damage them. The number of trees planted will be sufficient to help offset air quality impacts and enhance air quality as per recommendations made by the US Environmental Protection Agency regarding planting vegetation to mitigate near-road air quality issues. The project will ensure the survival or replacement of the trees for 10 years.

The sound wall will receive the highest standard anti-graffiti coating available at the time of its construction, and the project will ensure funding for graffiti removal for 25 years from date of completion.

The Shumway IBRP Action Group urges that the sound wall be designed to be as esthetically pleasing as possible, particularly when viewed from the west.

Construction vibration impacts. To mitigate adverse impacts of construction vibrations, the project will provide vibration monitoring for buildings and streets from F Street east to the freeway within the neighborhood boundaries. The project will also implement any and all materials and methods available to reduce/minimize the impact of construction vibration, including, but not limited to pile driving. Any damage that occurs will be repaired promptly at project expense.

Being kept up-to-date on project schedule. While it is understood that all dates will be in flux for a period of time, neighborhood residents need to know what will happen when so that they can adjust as much as possible.

The Shumway IBRP Action Group is concerned that a design is not yet available for the Fourth Plain Boulevard overpass adjacent to the neighborhood. The Shumway IBRP Action Group will have input on the overpass

design when available.

The Shumway IBRP Action Group advocates for construction of the proposed community connector between downtown Vancouver and the Vancouver National Historic Reserve to ensure that the IBR does not worsen the existing I-5 separation between these two important community resources.

The Shumway IBRP Action Group urges robust mitigation for all adverse effects of the IBR project on historic and archaeological resources. The Vancouver National Historic Reserve and Providence Academy have played important roles in community life historically and continue to do so. Project mitigation should help ensure that these significant resources, all listed on the National Register of Historic Places, are passed on to the future.

The Shumway IBRP Action Group opposes tolling until the project is complete. Residents of Shumway neighborhood are happy to pay bridge tolls after the Bridge is finished, the overpasses in Shumway neighborhood at 39th St., 33rd St., and 29th St. are complete, and all modifications to I-5 are completed. Until that time we expect to live with dirty air, construction noise and vibration, and likely a decade of increase road congestion. We cannot accept tolls along with these afflictions. We require a toll exemption for Shumway residents until completion.

IBR Draft SEIS - RECORD #2539 DETAIL

First Name :	Shera
Last Name :	Narruhn
Attachments :	DSEIS-2539_Narruhn_Original.pdf (4 kb)

IBR Draft SEIS - RECORD #2539 DETAIL

Submission Date :	11/18/2024
First Name :	Shera
Last Name :	Narruhn
Business/Organization/Agency :	211info

Submission Input :

1. Environmental Mitigation and Climate Resilience

The SEIS outlines a number of environmental concerns related to the new bridge, including air quality, water runoff, and noise. While I am glad to see that environmental mitigation strategies are being proposed, I believe more attention should be given to long-term environmental sustainability. In particular, I encourage further consideration of how the bridge design can be adapted to climate change impacts, including flooding and seismic activity.

Given the increasing severity of weather events and the region's vulnerability to earthquakes, I urge the team to ensure that the bridge's design can withstand such challenges. This could involve using advanced, climate-resilient materials, reinforcing the structure for seismic activity, and integrating stormwater management features that reduce runoff and protect the river ecosystem.

2. Traffic Management and Public Transit Options

The traffic analysis presented in the SEIS indicates a significant focus on alleviating congestion, but I'm concerned that simply expanding vehicle capacity may only provide temporary relief. As we've seen in other cities, adding more lanes often leads to more cars and doesn't solve the underlying problem of congestion. I would like to see more emphasis on multimodal transportation options, especially public transit.

As the region grows, we should be planning for more than just cars. Integrating dedicated bus lanes and potentially light rail into the bridge design would encourage people to leave their cars at home and improve the overall flow of traffic. Additionally, the environmental benefits of shifting to public transit, especially for commuters across the river, cannot be overstated. I hope the final design reflects these priorities.

3. Equity and Accessibility

One of the most critical aspects of this project is ensuring that it benefits everyone in the region, especially low-income and underserved communities. The SEIS discusses potential impacts on these communities, but I feel more needs to be done to ensure that tolling and other changes do not disproportionately affect people who rely on the bridge for daily commuting.

I would like to see equitable tolling solutions that offer discounts or exemptions for low-income individuals or essential workers. Additionally, we must ensure that the bridge's design does not displace local businesses or residents, particularly in communities that have been historically underserved in infrastructure planning. These neighborhoods should not only be protected but should have a voice in the ongoing discussions about the bridge's design and its impacts.

4. Health and Noise Impacts

The draft SEIS highlights concerns about noise levels from the new bridge and its potential impacts on nearby communities. I encourage the team to consider how noise reduction strategies can be incorporated, particularly in residential areas that are already affected by the current bridge. This could include noise barriers, traffic flow improvements, or other design adjustments that minimize sound pollution.

Furthermore, any potential health impacts from air quality due to traffic should be carefully monitored, especially in areas with higher rates of asthma and other respiratory conditions. It's critical that the project minimizes air pollution and takes steps to protect the health of all residents in the region.

5. Continued Public Involvement and Transparency

Finally, I want to emphasize the importance of keeping the public engaged and informed as the project moves forward. While the SEIS provides a lot of important information, many residents may not fully understand the complexities of the project or the potential impacts on their communities. Continued transparency and open lines of communication will ensure that the project remains accountable to the people it is meant to serve.

It's important that the public has opportunities to weigh in not just in the early stages but throughout the planning, design, and construction phases. Regular updates, public meetings, and clear communication about any changes or new findings will help maintain trust in the process.

Conclusion

I appreciate the work done so far on the Interstate Bridge Replacement Program, and I am hopeful that the final design will reflect the needs and concerns of all the people who will be affected. By prioritizing environmental sustainability, equitable access to transportation, and robust public engagement, this project can truly benefit the entire region for generations to come.

Thank you for considering my comments. I look forward to continued involvement in the process.AAA

IBR Draft SEIS - RECORD #2540 DETAIL

First Name :	Joshua
Last Name :	Putnam
Attachments :	DSEIS-2540_Putnam_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2540 DETAIL

Submission Date :	11/18/2024
First Name :	Joshua
Last Name :	Putnam
Business/Organization/Agency :	

Submission Input :

The scale of this project is excessive, especially the massive expansion of the approaches. This is no longer a bridge replacement project, it's a highway expansion project not justified by the surrounding economy. We should not be subsidizing single-occupant-vehicle commuters, which is the only use that requires a project of this scale.

IBR Draft SEIS - RECORD #2541 DETAIL

First Name :	Steven
Last Name :	Wright
Attachments :	DSEIS-2541_Wright_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2541 DETAIL

Submission Date :	11/18/2024
First Name :	Steven
Last Name :	Wright
Business/Organization/Agency :	Retired

Submission Input :

Why are we going to spend that much money on 200 year old technology?

IBR Draft SEIS - RECORD #2542 DETAIL

First Name :	Gabriel
Last Name :	Graff
Attachments :	DSEIS-2542_Graff_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2542 DETAIL

Submission Date :	11/18/2024
First Name :	Gabriel
Last Name :	Graff
Business/Organization/Agency :	

Submission Input :

As a North Portland resident living near I-5, it is difficult to see the need for a project with this large a footprint even looking far into the future. A combination of fewer auxiliary lanes and tolling would make the project more affordable and sustainable, increase the coalition of supporters, and make the project much more likely to come to fruition.

IBR Draft SEIS - RECORD #2543 DETAIL

First Name :	Andrew
Last Name :	Holtz
Attachments :	DSEIS-2543_Holtz_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2543 DETAIL

Submission Date : 11/18/2024
First Name : Andrew
Last Name : Holtz
Business/Organization/Agency :

Submission Input :

The new Interstate Bridge should be FUN to walk, bike or roll across. Of course, it must be safe and connected to regional paths. But it needs to be more than the minimum. It should let people see the stunning river and landscape. It should offer comfortable spots to rest and take in the view.
Be sure to design for mitigation of traffic noise on multiuse path users. The roar of freeway traffic is physically and mentally punishing.
But to really encourage people to choose the healthier way across the river (for person, community & environment) be sure to design the paths so that crossing the bridge will be FUN!

IBR Draft SEIS - RECORD #2544 DETAIL

First Name :	Douglas
Last Name :	Tweet
Attachments :	DSEIS-2544_Tweet_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2544 DETAIL

Submission Date : 11/18/2024
First Name : Douglas
Last Name : Tweet
Business/Organization/Agency :

Submission Input :

Overall, I support the option of a single level bridge with moveable span, but with no light rail. Increase the number of through lanes for traffic and remove light rail entirely.

No Light Rail. It is a waste of money to accommodate a small percentage of commuters. Light Rail is NOT an improvement in transportation options. It is a bloated, expensive, inflexible waste of precious resources. Buses are much better as a mass transportation option. Use of buses for mass transit is far cheaper and more flexible than light rail. Buses can use the same lanes as cars, trucks, and emergency vehicles. Buses could be electric, if preferred. I used to commute to downtown Portland and used the Express Bus service from Fisher's Landing. It was inexpensive, fast, safe, and convenient.

IBR Draft SEIS - RECORD #2545 DETAIL

First Name :	Richard
Last Name :	Schramm
Attachments :	DSEIS-2545_Schramm_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2545 DETAIL

Submission Date :	11/18/2024
First Name :	Richard
Last Name :	Schramm
Business/Organization/Agency :	Retired

Submission Input :

The Columbia Crossing Bridge, or the new I-5 bridge planned to span the Columbia River, should be a toll bridge. Those who actually use the bridge should pay for its construction and its ongoing maintenance. The toll price should flex based on the time of day to allow the traffic flow to be spread out and thus allow a better user experience. I support tolls.

IBR Draft SEIS - RECORD #2547 DETAIL

First Name :	Max
Last Name :	Farbman
Attachments :	DSEIS-2547_Farbman_Original.pdf (3 kb)

IBR Draft SEIS - RECORD #2547 DETAIL

Submission Date : 11/18/2024
First Name : Max
Last Name : Farbman
Business/Organization/Agency :

Submission Input :

Support for Core Project Goals
I strongly support the Interstate Bridge Replacement Project as a vital investment for our growing region. This project should prioritize:

Public Transit Expansion: To reduce reliance on single-occupancy vehicles and improve access for all.
Active Transportation Infrastructure: Safe and efficient routes for pedestrians and cyclists.
Seismic Upgrades: Ensuring the bridge is resilient and prepared for a major earthquake.
Safety Enhancements: Reducing crashes and improving travel reliability for all users.
Concerns with Traffic Modeling and Freeway Expansion
I have significant concerns about the project's justification for expanding freeway capacity. Research consistently shows that adding lanes does not alleviate traffic congestion in the long term due to induced demand. Key studies include:

Duranton and Turner (2011): Demonstrated that increasing road capacity results in proportional increases in vehicle miles traveled (VMT).
Handy and Boarnet (2014): Highlighted the limitations of highway expansion as a congestion mitigation strategy.
Given these findings, I urge the project team to provide transparent information on the traffic modeling used in the SEIS. Specifically:

What assumptions underlie the traffic and demand projections?
How have induced demand and climate impact considerations been integrated into the analysis?
Why is a second auxiliary lane deemed necessary, and what evidence supports its inclusion?
Rethinking Regional Priorities
This project offers a unique opportunity to create a bridge that reflects the future needs of our region, emphasizing climate resilience and equitable transportation options. A design that prioritizes public transit, active transportation, and seismic safety aligns with Oregon and Washington’s climate and equity goals. By contrast, perpetuating outdated norms around freeway expansion undermines these priorities.

Cost-Effectiveness and Streamlined Solutions
A more streamlined solution focused on bridge replacement, transit enhancement, and active transportation could provide significant cost savings while delivering the greatest benefits. Expanding the freeway not only risks inflating project costs but may also compromise long-term regional goals. I urge decision-makers to conduct a thorough cost-benefit analysis of alternatives that do not include additional freeway lanes.

Final Thoughts
This is a once-in-a-generation opportunity to redefine transportation in our region. Let’s commit to building infrastructure that supports a sustainable, equitable, and forward-thinking future. The SEIS should reflect a

comprehensive approach that prioritizes long-term regional needs over short-term congestion relief through freeway expansion.

Thank you for your consideration.

IBR Draft SEIS - RECORD #2548 DETAIL

First Name :	Douglas
Last Name :	Tweet
Attachments :	DSEIS-2548_Tweet_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2548 DETAIL

Submission Date : 11/18/2024
First Name : Douglas
Last Name : Tweet
Business/Organization/Agency :

Submission Input :

Overall, I support the option of a single level bridge with moveable span, but with no light rail. Increase the number of through lanes for traffic and remove light rail entirely.

Too little space is devoted to the vast majority of commuters who travel by cars and trucks. Judging from Figure 2-18 in Chapter 2, the amount of bridge surface area devoted to light rail, buses, pedestrians, and bicycles is about equal to that for cars and trucks. It is absurd to have 50% of the bridge devoted to a small number of commuters; currently less than 2% (from IBR document dated November 23, 2021 cited in clarkcountytoday.com June 11, 2024 article “Over half Interstate Bridge Proposal allocated to transit, pedestrians, and bicyclists” by John Ley.) The IBR expects an (unbelievable) increase to ~12% by 2045 (Table 2 in Executive Summary). This represents an increase by a factor of 6 in 13 years. On what is this projection based? As I recall from the CRC project, their predictions were always wildly optimistic and greatly over-estimated the actual increase in mass transit ridership. Even if this were true, it is ridiculous to give 50% of the bridge to 12% of commuters, and cram 88% into the other half. Get rid of light rail, and replace with a bus option that uses the same lanes as cars, trucks, and emergency vehicles.

IBR Draft SEIS - RECORD #2549 DETAIL

First Name :	Jessica
Last Name :	Gosnell
Attachments :	DSEIS-2549_Gosnell_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2549 DETAIL

Submission Date :	11/18/2024
First Name :	Jessica
Last Name :	Gosnell
Business/Organization/Agency :	

Submission Input :

I support the building of a seismically resistant bridge replacement; however, this project as planned is positioned to encourage and actively promote more individual vehicular use and associated climate impact. This is an opportunity to mindfully address our climate goals and community needs. Encouraging more independent vehicles is more of the same planning that has caused emissions to be a primary climate change contributor. Alternative transportation needs to be prioritized not just in our written climate plans but in our infrastructure design. Paying 7bn dollars to move away from our climate goals is not in our best interest.

IBR Draft SEIS - RECORD #2550 DETAIL

First Name :	Douglas
Last Name :	Tweet
Attachments :	DSEIS-2550_Tweet_Original.pdf (2 kb)

IBR Draft SEIS - RECORD #2550 DETAIL

Submission Date : 11/18/2024
First Name : Douglas
Last Name : Tweet
Business/Organization/Agency :

Submission Input :

Overall, I support the option of a single level bridge with moveable span, but with no light rail. Increase the number of through lanes for traffic and remove light rail entirely.

Your plan does NOT alleviate traffic congestion; it does not meet the stated goals. According to the IBR report Chapter 3 “Existing Conditions”, Table 3.1-3, in 2019 the I-5 bridge experienced 3 hours of congestion (<45 mph) southbound in the mornings, and 8.75 hrs northbound. According to the Executive Summary (Table 2), for the best performing bridge option (using 2 auxiliary lanes) by 2045 the southbound lanes will experience 4.5 hrs of congestion, but the northbound lanes 6 hours. So, IBR predicts the morning commute will be 50% worse than 2019, while the northbound lanes will be about 32% better. If only one auxiliary lane, the northbound will have 9 hours of congestion, or about the same as 2019. So, after spending over $7B, traffic will be worse in the morning, and maybe a bit better in the evening commute. Since the vast majority of commuters travel by private cars, how much more improvement in congestion would be achieved by getting rid of light rail and dedicated bus lanes and increasing general purpose lanes shared by cars, trucks, buses, and emergency vehicles? I suspect the reduction in congestion would be considerable. Your cult-like focus on light rail at all costs makes your plan a failure at meeting the main stated goal of this entire project, relieving congestion.

IBR Draft SEIS - RECORD #2551 DETAIL

First Name :	Douglas
Last Name :	Tweet
Attachments :	DSEIS-2551_Tweet_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2551 DETAIL

Submission Date : 11/18/2024
First Name : Douglas
Last Name : Tweet
Business/Organization/Agency :

Submission Input :

Overall, I support the option of a single level bridge with moveable span, but with no light rail. Increase the number of through lanes for traffic and remove light rail entirely.

The proposed bridge is too low, blocking upstream river traffic. Just buying off the owners of the current upstream companies permanently eliminates those jobs. You claim the IBR is a job creator, but those construction jobs are temporary. Meanwhile you are permanently eliminating many other jobs. Also, by making the bridge too low you restrict possible future upstream businesses and jobs. I prefer allowing the bridge to open to river traffic as desired by the US Coast Guard (Chapter 2, p 2-23). This seems to be Configuration (3) on page 9 of Executive Summary: Single level bridges with moveable spans over the primary navigation area. This appears to be the same as in column 7 of Tables 2 and 3. Also, do this with no light rail, so can have more than 3 through lanes (e.g. 4 or 5 each way), as well as one auxiliary lane each way for on/off traffic. If you eliminate light rail, the bridge could get down to ground level more quickly. No need for a special bridge for LR tracks 75 ft above downtown Vancouver.

IBR Draft SEIS - RECORD #2552 DETAIL

First Name :	Ricky
Last Name :	Carmolinga
Attachments :	DSEIS-2552_Carmolinga_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2552 DETAIL

Submission Date : 11/18/2024

First Name : Ricky

Last Name : Carmolinga

Business/Organization/Agency :

Submission Input :

I appreciate the bridge model you have where the bike and pedestrian pathway are on the the east side of the bridge and in the open air. That design is going to make me more likely to use the pathway that than if it was in a double decker configuration underneath the car traffic and next to light rail transit. It also gives a great opportunity to see a great vista of the Columbia River looking east with the gorge and Mt. Hood in the distance. There's an argument I've heard about the double decker configuration model also being displayed as helping protect walkers and riders from the elements. I don't buy it. As they still have to ride or walk in the elements to get to bridge pathway, anyway. What's more important is to make it as inviting as possible for people to use by foot or on bikes. The open air, on the east side of the bridge, version does a much better job of that.

IBR Draft SEIS - RECORD #2553 DETAIL

First Name :	Douglas
Last Name :	Tweet
Attachments :	DSEIS-2553_Tweet_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2553 DETAIL

Submission Date :	11/18/2024
First Name :	Douglas
Last Name :	Tweet
Business/Organization/Agency :	

Submission Input :

Overall, I support the option of a single level bridge with moveable span, but with no light rail. Increase the number of through lanes for traffic and remove light rail entirely.

All of your options grab about 47 acres of land, displacing 43 residential units and 36 businesses, including the 5 year old Hurley building. If there were no light rail, how much could this disruption be reduced? Obviously, the reduction would be substantial.

IBR Draft SEIS - RECORD #2554 DETAIL

First Name :	Douglas
Last Name :	Tweet
Attachments :	DSEIS-2554_Tweet_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2554 DETAIL

Submission Date :	11/18/2024
First Name :	Douglas
Last Name :	Tweet
Business/Organization/Agency :	

Submission Input :

Overall, I support the option of a single level bridge with moveable span, but with no light rail. Increase the number of through lanes for traffic and remove light rail entirely.

I am against tolling. Tolls are a regressive tax on working people, as you admit “tolling would place a burden on low-income travelers” (page S-19). Furthermore, tolling is a grossly inefficient way to pay for a bridge, since in many cases around the US the tolling company keeps 50% or more of the tolls collected. For example, In Seattle on I-405, 68% of the money collected goes to the “cost of collection” (see notolls.com).

IBR Draft SEIS - RECORD #2555 DETAIL

First Name :	Chuck & Jenni
Last Name :	Frayer
Attachments :	DSEIS-2555_Frayer_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2555 DETAIL

Submission Date :	11/18/2024
First Name :	Chuck & Jenni
Last Name :	Frayer
Business/Organization/Agency :	N/A

Submission Input :

We have a floating house at Jantzen Beach Moorage on Hayden Island. There are 178 homes in this community. We are in row B and are very concern about losing it. As we understand, rows A & B will be taken out with the new bridge.
We have been there for 7 years and the reason we are there is because I'm disabled in a wheelchair and this moorage is the only accessible one on the river so there's know other places to move it to.
So the question is, what happen now and what do we do?

Thank you for your time
Chuck & Jenni Frayer

IBR Draft SEIS - RECORD #2556 DETAIL

First Name :	Douglas
Last Name :	Tweet
Attachments :	DSEIS-2556_Tweet_Original.pdf (2 kb)

IBR Draft SEIS - RECORD #2556 DETAIL

Submission Date : 11/18/2024
First Name : Douglas
Last Name : Tweet
Business/Organization/Agency :

Submission Input :

Overall, I support the option of a single level bridge with moveable span, but with no light rail. Increase the number of through lanes for traffic and remove light rail entirely.

The IBR LPA plan achieves the exact opposite of all their Equity goals:
a) Reduces mobility and accessibility: By putting all the money into light rail, access to buses into local neighborhoods is reduced. Also, money spent on light rail could be better used towards building affordable housing. Light rail is expected to cost (at least) an extra $2B. If buses were used instead of light rail, even if half of the savings would be devoted to affordable housing, the impact on “equity and environmental justice” would be huge and long-lasting.
b) Physical Design: A huge, noisy bridge flying over downtown Vancouver will be an obnoxious eyesore and irritant to any of the people living and working in that area.
c) Community benefits: Removing many acres of buildings and residents in the downtown Vancouver area will not benefit the community, but rather further enrich only a few wealthy people who sell their property to the government.
d) Workforce equity and economic opportunity: Permanently destroying the upriver businesses from the too low bridge will put many people out of work now, as well as end potential future jobs. Removing 47 acres of businesses and residences in downtown Vancouver will also permanently eliminate many more jobs.
e) Decision-making processes: From what I’ve seen so far, the decisions have already been made by those in power, and everything else is a mirage. This whole project has been driven by light rail, and no other option was seriously considered.
f) Avoid further harm: Your bloated light rail bridge in Vancouver will do irreparable harm to the community. Just the usual rich people will benefit.

IBR Draft SEIS - RECORD #2557 DETAIL

First Name :	Patricia
Last Name :	Bugas-Schramm
Attachments :	DSEIS-2557_Bugas-Schramm_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2557 DETAIL

Submission Date : 11/18/2024

First Name : Patricia

Last Name : Bugas-Schramm

Business/Organization/Agency :

Submission Input :

Please toll Columbia River bridges in the Portland-Vancouver metro area. Sliding rates based on time of day smoothes out demand while supporting long term repair and maintenance of these structures. Every major metro area uses tolls. It is time we augment transportation funding proportionate to use and in support of long term preservation of these critical public assets. Transponder on windshields and creating user accounts (like Hood River) keeps traffic flowing. We need tolling to manage current and projected growth of these structures' use.

IBR Draft SEIS - RECORD #2558 DETAIL

First Name :	Ian
Last Name :	Blackburn
Attachments :	DSEIS-2558_Blackburn_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2558 DETAIL

Submission Date :	11/18/2024
First Name :	Ian
Last Name :	Blackburn
Business/Organization/Agency :	

Submission Input :

I care about the iconic historic buildings that are an active part of our community, and are an incredibly important part of our community’s history. To make sure buildings stay preserved durning the construction and don’t get demolished.

IBR Draft SEIS - RECORD #2559 DETAIL

First Name :	Melissa
Last Name :	Parmeter
Attachments :	DSEIS-2559_Parmeter_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2559 DETAIL

Submission Date :	11/18/2024
First Name :	Melissa
Last Name :	Parmeter
Business/Organization/Agency :	

Submission Input :

Replacing a 3-lane bridge with a 3-lane bride, for $7.5B , is not progress. Washington and Oregon need a third bridge across the Columbia river for freight. Removing freight from the I-5 bridge will greatly reduce traffic congestion.

Light rail across the Columbia river will not reduce traffic congestion on I-5.
Rerouting freight off I-5 between the Marquam bridge and the I-5 bridge is a more effective and less expensive alternative than light rail.

If MAX reduced traffic congestion then traffic between the I-5 bridge and the Marquam bridge would already be reduced, but MAX is not relieving traffic. Commuters do not want light rail, they want to dive their cars in reduced traffic across the I-5 bridge and downtown Portland.

IBR Draft SEIS - RECORD #2560 DETAIL

First Name :	Eudaemone
Last Name :	Battilega
Attachments :	DSEIS-2560_Battilega_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #2560 DETAIL

Submission Date : 11/18/2024
First Name : Eudaemone
Last Name : Battilega
Business/Organization/Agency :

Submission Input :

First Name:
Eudaemone

Last Name:
Battilega

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
There is no question that the bridge needs to be replaced. But this is NOT the correct plan of action. I strongly oppose this expansion as proposed. ODOT and WSDOT are proposing a massive, $7+ billion, five mile highway expansion That will not solve the problem and only cause more issues with transportation (including pedestrians and cycling.

After looking at the numbers it's clear that ODOT and WSDOT are simply lying to the public on the traffic projections.

As reported in Willamette Week:

“A new examination of the assumptions underlying the proposed Interstate Bridge between Portland and Vancouver says the project relies on bogus numbers. The new study was commissioned by the Just Crossing

Alliance, which wants to reduce the freeway component of the project but supports parts of it, including the seismic replacement, light rail extension and bike and pedestrian improvements.”

JCA comment #: 710

IBR Draft SEIS - RECORD #2561 DETAIL

First Name :	Robin
Last Name :	Jensen
Attachments :	DSEIS-2561_Jensen_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #2561 DETAIL

Submission Date : 11/18/2024
First Name : Robin
Last Name : Jensen
Business/Organization/Agency :

Submission Input :

First Name:
Robin

Last Name:
Jensen

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
I am extremely disappointed to see the current plan for the IBR to be so short-sighted in so many ways. My 2 biggest concerns: 1- Though at the present time there are capacity limitations of the Steel Bridge, the Regional Transportation Plan expects the need for expansion, which will include 4-car trains through Portland. Unless the IBR also plans for increased transit capacity, there will be no solution to getting those larger trains across the river. When I look at the passenger capacity of various transportation modes, it makes no sense that we are

planning to increase single car traffic lanes and not planning for expansion of various rail options. 2- The siting of the transit on the opposite side and/or on different levels of the bridge from the active transportation lines makes no sense. It will make it much more difficult for people to be able to transfer. The proposed steep, spiral path down to Vancouver would also be extremely challenging for bikers and walkers in both directions. In addition, if the multi-use path is separated from the vehicular traffic lanes, the transit lines will shield bikers and walkers from noise and exhaust pollution from cars.

Thank you for considering these concerns.

JCA comment #: 709

IBR Draft SEIS - RECORD #2562 DETAIL

First Name :	Becky
Last Name :	Newman
Attachments :	DSEIS-2562_Newman_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #2562 DETAIL

Submission Date : 11/18/2024
First Name : Becky
Last Name : Newman
Business/Organization/Agency :

Submission Input :

First Name:
Becky

Last Name:
Newman

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
Just wanted my voice to be counted among the many who desire planning that prioritizes people and de-emphasizes car-centric thinking. I wish for a safe, connected bikeway across the Columbia and affordable mass transit, both of which will encourage fewer car trips between Portland and Vancouver.

JCA comment #: 708

IBR Draft SEIS - RECORD #2563 DETAIL

First Name :	Michell
Last Name :	Prunty
Attachments :	DSEIS-2563_Prunty_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #2563 DETAIL

Submission Date : 11/18/2024
First Name : Michell
Last Name : Prunty
Business/Organization/Agency :

Submission Input :

First Name:
Michell

Last Name:
Prunty

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Hayden Island Issues

Comment:
I am frequently on Hayden Island and if you aren't there everyday you don't realize how bad the public infrastructure is. It is very hard for people to walk or bike on the Island and there is a massive demand for more public transportation since it's not safe to walk or bike. Widening the freeway will make these problems worse and hurt the people who live / work on the island. Please consider instead of investing in widening the freeway that we invest in better public transportation alternatives and SAFE walking / biking paths for people on the island. Please spend some time walking around the island during busy hours and consider how widening the freeway will adversely affect people.

JCA comment #: 707

IBR Draft SEIS - RECORD #2564 DETAIL

First Name :	Daniel
Last Name :	Hoyer
Attachments :	DSEIS-2564_Hoyer_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #2564 DETAIL

Submission Date : 11/18/2024
First Name : Daniel
Last Name : Hoyer
Business/Organization/Agency :

Submission Input :

First Name:
Daniel

Last Name:
Hoyer

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Parks and Recreation

Comment:
I use the crossing multiple times a week on my bicycle, there need to be easy connections from local access to the bridge, current situation is ridiculous
light rail is essential to making the bridge work for all
keep plan simple with minimal work beyond the crossings, a bigger road will not solve congestion, good alternatives will

JCA comment #: 706

IBR Draft SEIS - RECORD #2565 DETAIL

First Name :	Philip
Last Name :	Brunner
Attachments :	DSEIS-2565_Brunner_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #2565 DETAIL

Submission Date : 11/18/2024
First Name : Philip
Last Name : Brunner
Business/Organization/Agency :

Submission Input :

First Name:
Philip

Last Name:
Brunner

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
I am a North Portland resident (Kenton). All studies I have seen easily state increasing capacity increases traffic and overall emissions, which is the exact opposite of what we need to be doing. Even worse much of these emissions are in my neighborhood. My preference would be to keep the bridge and just retrofit it for any concerns with safety. The costs I saw showed that we could easily do this for many decades before even coming close to the cost of the new bridge. That said I'm sure you're already planning to replace it, so my

requests would be that it includes MAX access up to Vancouver (something that certainly would be helpful for me and many others). In additional to light rail, it needs to prioritize the safe travel of cyclists and pedestrians to be able to not only use the bridge but also any connections to it as well. I am supportive of tolling to be added to help deal with congestion, but insist it be done with equity in mind. My understand is that ODOT has a program already around this. Again, my preference is that we don't replace the existing bridge to increase capacity, that is a short sighted plan that has been proven in many studies. We should be trying to find ways to reduce traffic, which means alternate means of transportation (active and public). Thank you.

JCA comment #: 705

IBR Draft SEIS - RECORD #2566 DETAIL

First Name :	Nicholas
Last Name :	Burns
Attachments :	DSEIS-2566_Burns_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #2566 DETAIL

Submission Date : 11/18/2024
First Name : Nicholas
Last Name : Burns
Business/Organization/Agency :

Submission Input :

First Name:
Nicholas

Last Name:
Burns

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
This project doesn't look like it will solve the issues it claims to solve. Building more lanes and widening freeways does not improve traffic in the long term. We need proven solutions that work and are are affordable, adding more lanes has shown by example to be a bad use of money and time, and just makes the climate emergency worse.

JCA comment #: 704

IBR Draft SEIS - RECORD #2567 DETAIL

First Name :	Esther
Last Name :	Harlow
Attachments :	DSEIS-2567_Harlow_Original.pdf (9 kb)

IBR Draft SEIS - RECORD #2567 DETAIL

Submission Date : 11/18/2024
First Name : Esther
Last Name : Harlow
Business/Organization/Agency :

Submission Input :

First Name:
Esther

Last Name:
Harlow

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
Right size this project. We are in a climate crisis and we will be fighting an uphill battle to lessen carbon emissions, both those caused directly by gas vehicle traffic and those caused by repair from electric vehicle traffic (road repair from heavier vehicles, output from mining, etc.) I want to be able to get across this bridge in multiple manners of travel and not be reliant on my expensive car travel. we can't afford it in every sense of the word.

Prioritize racial and economic equity in every step of the project.

Transit and the multi-use path should be next to each other, for seamless transfers and ease of use. Path users should have convenient access to transit elevators, especially at elevated stations.
Positioning transit lanes as buffers between the multi-use path and vehicle lanes can reduce noise, debris, and enhance user safety.
Vancouver: The path should extend to Evergreen to prevent the need for using a 100-foot high spiral.
Portland: Add connections to the popular Vancouver/Williams corridor in addition to the planned Kenton/Denver Ave. link.
Transit Stations should be built to support four-car trains now to align with future downtown transit tunnel upgrades.
Plan for even higher capacity transit systems, such as multi-lane Bus Rapid Transit (BRT) or heavy rail, beyond the 2045 Environmental Impact Statement (EIS) horizon. We must ensure today's infrastructure can adapt to tomorrow's needs.
Traffic modeling must realistically account for induced demand to ensure accurate projections for transit and road use.
Implement a low-income toll discount program from the first day of pre-completion tolling. This will help prevent financial burdens on vulnerable communities. Freeway impacts—such as noise and tolls—disproportionately affect historically marginalized communities. Use economically and racially focused, equitable solutions.
Current traffic modeling issues mean that health impact assessments (air quality, safety, etc.) are unreliable. A new, more realistic Supplemental Environmental Impact Statement (DSEIS) is needed. Increased traffic under any scenario poses serious health risks and exacerbates negative outcomes for priority communities.
The DSEIS does not provide sufficient justification for a second auxiliary lane.
Prioritizing a streamlined project focused on bridge replacement, transit enhancements, and active transportation—without extensive freeway expansion—would be more beneficial and cost-effective.

JCA comment #: 703

IBR Draft SEIS - RECORD #2568 DETAIL

First Name :	David
Last Name :	Feldman
Attachments :	DSEIS-2568_Feldman_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #2568 DETAIL

Submission Date : 11/18/2024
First Name : David
Last Name : Feldman
Business/Organization/Agency :

Submission Input :

First Name:
David

Last Name:
Feldman

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
Too many car lanes, too many exits. Delete the 4th plain exit.

JCA comment #: 702

IBR Draft SEIS - RECORD #2569 DETAIL

First Name :	Michell
Last Name :	Prunty
Attachments :	DSEIS-2569_Prunty_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #2569 DETAIL

Submission Date : 11/18/2024
First Name : Michell
Last Name : Prunty
Business/Organization/Agency :

Submission Input :

First Name:
Michell

Last Name:
Prunty

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
Hello, as someone who uses the freeway and bridge nearly 5x a week, I'd like to comment that I do NOT want a freeway expansion. I would greatly appreciate safer / wider biking and pedestrian crossing along with public transportation with better connections to Williams. I would not need or want to drive if we invested in alternative transportation. I would like to see a study on Immersed Tube Tunnel as a viable alternative to a freeway expansion. 100% no one I have talked to in my neighborhood wants a freeway expansion. We all want better alternative options.

JCA comment #: 701

IBR Draft SEIS - RECORD #2570 DETAIL

First Name :	Emily
Last Name :	Platt
Attachments :	DSEIS-2570_Platt_Original.pdf (11 kb)

IBR Draft SEIS - RECORD #2570 DETAIL

Submission Date :	11/18/2024
First Name :	Emily
Last Name :	Platt
Business/Organization/Agency :	Third Act Oregon

Submission Input :

First Name:
Emily

Last Name:
Platt

Business or Organization:
Third Act Oregon

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:

Comments by Third Act Oregon
Equitable, Accessible, Safe and Green Transportation for All

As elders and Third Act Oregon members deeply concerned about climate change and equitable access to safe, clean and reliable transportation, we advocate for an IBR that travelers of all abilities can easily use, decreases greenhouse gas emissions, and reduces the pollution burden on nearby historically marginalized communities. Importantly, robust public transit and active transportation options are essential for car-free or non-driving elders who wish to access amenities on either side of the Columbia River. Such transportation choices will enhance elder quality of life and help elders age in place. With these issues in mind, we have the following comments:

1. Facilitate Active Transportation:

Side-by-side Integration: Transit and the multi-use path should be next to each other, for seamless transfers and ease of use. Path users should have convenient access to transit elevators, especially at elevated stations.

Noise and Safety: Positioning transit lanes as buffers between the multi-use path and vehicle lanes can reduce noise, debris, and enhance user safety.

Better Connections:

• Vancouver: The path should extend to Evergreen to prevent the need for using a 100-foot high spiral.
• Portland: Add connections to the popular Vancouver/Williams corridor in addition to the planned Kenton/Denver Ave link.

2. Expand Access to Public Transportation

Future-Proofing for Capacity:

Stations should be built to support four-car trains now to align with future downtown transit tunnel upgrades. Plan for even higher capacity transit systems, such as multi-lane Bus Rapid Transit (BRT) or heavy rail, beyond the 2045 Environmental Impact Statement (EIS) horizon. We must ensure today's infrastructure can adapt to tomorrow's needs.

Induced Demand Consideration: Traffic modeling must realistically account for induced demand to ensure accurate projections for transit and road use.

3. Ensure Economic and Racial Justice

Tolling Equity: Implement a low-income toll discount program from the first day of pre-completion tolling. This will help prevent financial burdens on vulnerable communities.

Equity Priority: Freeway impacts—such as noise and tolls—disproportionately affect historically marginalized communities. Addressing this requires focused, equitable solutions

4. Reduce Negative Health Effects

Reliable Assessments: Current traffic modeling issues mean that health impact assessments (air quality, safety, etc.) are unreliable. Increased traffic under any scenario poses serious health risks and exacerbates negative outcomes for priority communities. A new, more realistic Supplemental Environmental Impact Statement (SEIS) is needed.

5. Right-Size the IBR

The draft SEIS does not provide sufficient justification for a second auxiliary lane. We should avoid subsidizing private auto travel at expense of walkers/rollers/cyclists.

Prioritizing a streamlined project focused on bridge replacement, transit enhancements, and active transportation—without extensive freeway expansion—would be more beneficial and cost-effective.

6. Improve the Environment and Climate

Transportation is Oregon's largest source of climate pollution. Building excellent active transportation and transit facilities will reduce vehicle miles traveled (VMT).
Global impacts: The current design does little to reduce auto travel. Shifting travel modes to active transport and transit is the most effective way of reducing VMT and meeting specific state/regional carbon reduction goals.
Local impacts: If the IBR project fails to reduce VMT, impacts to local communities include (1) additional air pollution (particulate and GH gases). (2) Degraded water quality from road-way run-off containing chemicals, oil, and tire and brake particulates, and (3) Additional noise pollution to surrounding communities.

Third Act Oregon
[redacted]

JCA comment #: 700

IBR Draft SEIS - RECORD #2571 DETAIL

First Name :	Christine
Last Name :	Douglass
Attachments :	DSEIS-2571_Douglass_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #2571 DETAIL

Submission Date : 11/18/2024
First Name : Christine
Last Name : Douglass
Business/Organization/Agency :

Submission Input :

First Name:
Christine

Last Name:
Douglass

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
I am writing out of concern that the plans for the Interstate Bridge project have not been adequately considered with the needs and interests of the public in mind. Careless plans -- such as the placement of light rail and active transportation on opposite sides of the bridge, and the design of the ridiculous corkscrew -- reflect a lack of due diligence and misuse of public funds. This project is a massive investment. Surely, we can find smarter and more creative ways to design the project to maximize efficiency, minimize negative impacts, and achieve goals related to the environment, social justice, economic vitality, and more.

JCA comment #: 699

IBR Draft SEIS - RECORD #2572 DETAIL

First Name :	Greg
Last Name :	Adams
Attachments :	DSEIS-2572_Adams_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #2572 DETAIL

Submission Date :	11/18/2024
First Name :	Greg
Last Name :	Adams
Business/Organization/Agency :	Just Crossing Alliance
Attachments :	DSEIS_2572_Adams_20241118_Original.pdf (3 kb)

Submission Input :

First Name:
Greg

Last Name:
Adams

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
I fully support efforts to replace the current connection with a bridge that is seismically sound-- we need this bridge to survive any seismic events in the future. However, it amazes me that even though both states have policies to reduce greenhouse gas emissions, these reductions aren't a central part of the current vision. This

large-scale project looks more like an expensive freeway expansion project than an investment in sustainable transportation and land use. The proposal gives insufficient focus to reducing vehicle miles traveled (VMT), maximizing active transportation in the surrounding areas, or providing credible modeling that acknowledges the induced demand that would come from any capacity expansion. For these reasons, I request that you explore a more cost-effective direct replacement of the existing bridge with transit and active transportation improvements that does not include any capacity expansion.

JCA comment #: 698

IBR Draft SEIS - RECORD #2573 DETAIL

First Name :	Jacob
Last Name :	Antles
Attachments :	DSEIS_2573_Antles_Original.pdf (5 kb)

IBR Draft SEIS - RECORD #2573 DETAIL

Submission Date :	11/18/2024
First Name :	Jacob
Last Name :	Antles
Business/Organization/Agency :	
Attachments :	DSEIS_2573_Antles_20241118_Original.pdf (3 kb)

Submission Input :

I'd like to see a more robust traffic analysis and projection especially considering the impacts of tolling both I5 and I205. Like we see with climate modeling where they model multiple different potential futures consiidering a range of different assumptions using the best climate science in the main variables then they negotiate and agree to some averaged climate model. I'd like to see some similar traffic analysis as well. For exampble, potential variables that could be looked at and modeled for increases, decreases, to differing degrees, or stays stable: work-from-home, impact of tolling, impact of free transit, impact of significanty increased urban construction, increased transit oriented development, impact of decreased freight, decreased car traffic, etc.

Further, it would be helpful to see the user and price impacts of significantly reducing the scope and scale of the interchanges, like reducing traffic speed/flow. Also to sve money, can we compromize on shoulder widths land widths? Also, we should say goodbye to Pearson field and help expand a suburban airport. This land would be better used for dense urban housing, close to the new bridge transit options, downtown vancouver, and Portland. Plus it seems like the proximty of the airport reduces the bridge designs and this would help with that.

I'd like to see better design around bike bus and pedestrian connections to downtown vancouver and established plus future bike routes in portland.

I'd like to see better compatibility to Oregon, Washington, and Portland climate goals, and rather than planning for zero congestion in 30 years, planning around keeping car traffic to levels conpatible with those goals.

IBR Draft SEIS - RECORD #2574 DETAIL

First Name :	Emily
Last Name :	Platt
Attachments :	DSEIS_2574_Platt_Original.pdf (12 kb)

IBR Draft SEIS - RECORD #2574 DETAIL

Submission Date :	11/18/2024
First Name :	Emily
Last Name :	Platt
Business/Organization/Agency :	Just Crossing Alliance
Attachments :	DSEIS_2574_Platt_20241118_Original.pdf (8 kb)

Submission Input :

First Name:
Emily

Last Name:
Platt

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
I am a Portland resident who has lived in a car-free household for the last 15 years. We have chosen to extract ourselves from a dirty, polluting, and lethal transportation choice that is a major contributor to the worsening climate crisis. Members of my household walk, bike, and use public transportation to get where they need to

go. It has been gratifying to see the recent improvements in car-free transportation infrastructure in my neighborhood. These improvements include better bike lanes protected from traffic, bendy buses that also allow easy transportation of bikes, the expanded MAX line to Milwaukie, and Tilikum Crossing. The IBR project must incorporate and improve upon these types of designs so that crossing the Columbia River is accessible, safe, and equitable to those of us who are car-free. With these issues in mind, I have the following comments on the IBR project:

1. Facilitate Active Transportation:
Side-by-side Integration: Transit and the multi-use path should be next to each other, for seamless transfers and ease of use. Path users should have convenient access to transit elevators, especially at elevated stations.
Noise and Safety: Positioning transit lanes as buffers between the multi-use path and vehicle lanes can reduce noise, debris, and enhance user safety.
Better Connections:
• Vancouver: The path should extend to Evergreen to prevent the need for using a 100-foot high spiral. As an experienced biker who has navigated the spiral to the Morrison Bridge and found it to be a real pain, a 100 foot high spiral would be an impediment to those who wish to explore active transportation across the IBR.
• Portland: Add connections to the popular Vancouver/Williams corridor in addition to the planned Kenton/Denver Ave link.
2. Expand Access to Public Transportation
Future-Proofing for Capacity:
Stations should be built to support four-car trains now to align with future downtown transit tunnel upgrades. Plan for even higher capacity transit systems, such as multi-lane Bus Rapid Transit (BRT) or heavy rail, beyond the 2045 Environmental Impact Statement (EIS) horizon. We must ensure today's infrastructure can adapt to tomorrow's needs.
Induced Demand Consideration: Traffic modeling must realistically account for induced demand to ensure accurate projections for transit and road use.
3. Ensure Economic and Racial Justice

Tolling Equity: Implement a low-income toll discount program from the first day of pre-completion tolling. This will help prevent financial burdens on vulnerable communities.
Equity Priority: Freeway impacts—such as noise and tolls—disproportionately affect historically marginalized communities. Addressing this requires focused, equitable solutions
4. Reduce Negative Health Effects
Reliable Assessments: Current traffic modeling issues mean that health impact assessments (air quality, safety, etc.) are unreliable. Increased traffic under any scenario poses serious health risks and exacerbates negative outcomes for priority communities. A new, more realistic Supplemental Environmental Impact Statement (SEIS) is needed.
5. Right-Size the IBR
The draft SEIS does not provide sufficient justification for a second auxiliary lane. We should avoid subsidizing private auto travel at expense of walkers/rollers/cyclists.
Prioritizing a streamlined project focused on bridge replacement, transit enhancements, and active transportation—without extensive freeway expansion—would be more beneficial and cost-effective.
6. Improve the Environment and Climate
Transportation is Oregon's largest source of climate pollution. Building excellent active transportation and

transit facilities will reduce vehicle miles traveled (VMT).
Global impacts: The current design does little to reduce auto travel. Shifting travel modes to active transport and transit is the most effective way of reducing VMT and meeting specific state/regional carbon reduction goals.
Local impacts: If the IBR project fails to reduce VMT, impacts to local communities include (1) additional air pollution (particulate and GH gases). (2) Degraded water quality from road-way run-off containing chemicals, oil, and tire and brake particulates, and (3) Additional noise pollution to surrounding communities.

Emily Platt
[redacted]

JCA comment #: 697

IBR Draft SEIS - RECORD #2575 DETAIL

First Name :	Sarah
Last Name :	Risser
Attachments :	DSEIS_2575_Risser_Original.pdf (11 kb)

IBR Draft SEIS - RECORD #2575 DETAIL

Submission Date :	11/18/2024
First Name :	Sarah
Last Name :	Risser
Business/Organization/Agency :	Families for Safe Streets PDX
Attachments :	DSEIS_2575_Risser_20241118_Original.pdf (9 kb)

Submission Input :

First Name:
Sarah

Last Name:
Risser

Business or Organization:
Families for Safe Streets PDX

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Topic Area:
Transportation

Comment:
I am submitting comments to the Interstate Bridge Replacement project as a leader and on behalf of FAMILIES FOR SAFE STREETS PDX

Families for Safe Streets is an advocacy organization that exists to address our unacceptable - and worsening - road fatality crisis. Families for Safe Streets understands that all road fatalities are preventable and unacceptable, that it is a basic human right to be safe and to feel safe in Oregon's roads whether traveling by truck, car, bicycle, motorcycle, foot, wheelchair, or otherwise rolling. All of our members have either lost a

family member or have been seriously injured in road traffic.

The road fatality epidemic in the Portland metropolitan area is particularly dire. Despite the existence of a Vision Zero Program the number of fatalities has increased over the recent past, with a disproportionate rise in pedestrian fatalities.

All decisions on the Interstate Bridge Replacement project should be informed by the undeniable fact that our transportation system contributes in significant and unacceptable ways to two concerning life-threatening crises: 1) climate collapse and 2) a worsening epidemic of violent and preventable road fatalities and serious injuries. To dismiss or downplay these crises by not ensuring they are addressed to the extent possible represents a willful acceptance of future harm to both individuals and the environment and a lack of concern for the damage that the system has already inflicted; to dismiss or downplay these crises represents a clear moral failing.

To increase safety, the Interstate Bridge Replacement project must ensure complete and safe connections to the existing active transportation network. Given the significant amount of freight on and approaching the bridge, the pathways and connections for all non-vehicular (vulnerable) road users must be physically separated from all vehicular traffic, most especially where new ramps and interchanges will be constructed. To ensure safety and equity, it is imperative to ensure all road users are safe and feel safe. This will ensure that those who prefer to leave their car behind can do so without worrying about bodily harm or death.

Maximizing the separation between vehicular traffic and vulnerable road users is imperative to ensuring walking, rolling, and biking routes are used to the extent possible. Specifically, the current design for the ramp from Vancouver Way to MLK North exposes low-impact road users to conflict with freight, because the proposed route is convoluted, traveling down, across, and back up a freight-heavy on-ramp. Moreover, given the Marine Drive interchange is usually described as the most heavily used freight corridor in Oregon, additional alternatives that entirely separate walk/bike/roll travel around rather than through this important freight interchange must be studied.

Connection to the Interstate Avenue/Expo Way Walk/Bike/Roll Corridor presents a well-designed, safe separation for walk/bike/roll users along the Interstate Avenue/Expo Way corridor. This corridor provides an excellent example of the type of separation that should be extended to all Oregon active transit corridors.

The proposed design for the Marine Drive Single Point Interchange presents a potential conflict between bike lanes and freight traffic and so alternatives need to be studied, including removing bike lanes from this interchange and reinvesting saved funds into enhancing other connections. These studies should explore how the project will meet the requirements of the Oregon Bike Bill without relying on shoulders of MLK and Marine Drive for bike travel. The Oregon Bike Bill allows for more design flexibility than the IBR project acknowledges. Given this, all allowable uses of the required 1% for bike/ped must be studied with a focus on promoting vulnerable road user safety.

The Vancouver/Williams Walk/Bike/Roll Corridor's connection to the new main bridge multi-use path (MUP) is indirect and complicated. Northbound users must navigate bike lanes along the shoulders of northbound MLK,

while southbound users must travel along a separated bike lane next to Union Court before joining southbound MLK on a shoulder bike lane. This is a crash waiting to happen. Additional alternatives must be explored.

The 40-Mile Loop East/West Corridor is the main trail hub for Portland and when fully completed will connect most of the other trails in the region. Ensuring connections with the 40-Mile Loop are at potential is important for ease of use and wayfinding. The proposed eastbound connection to the Bridgeton Trail portion of the 40-Mile Loop must be improved. The current design requires out-of-direction travel, routing users around a traffic circle to access the multi-use path on the west side of the Harbor Bridge. This is both inconvenient and inefficient. Alternative designs need to be considered to provide a direct connection from the Bridgeton Trail to the east-side sidewalk of the Harbor Bridge. This would encourage more users to cross the bridge as the east sidewalk offers a scenic view of North Portland Harbor and Mt. Hood. Additionally, we request that the sidewalk on the east side of the Harbor Bridge be as wide as possible and built with wide viewing areas to rest and enjoy the view.

Ensuring non-vehicular modes of travel are as safe and efficient as possible is imperative to ensuring individuals have robust transportation choices and can, if they prefer to, leave their cars behind. Reducing vehicular traffic is essential to combating congestion; we know that it is impossible to build our way out of congestion problems. Reducing vehicular traffic is also essential to increasing safety on our roads.

JCA comment #: 696

IBR Draft SEIS - RECORD #2576 DETAIL

First Name :	Max
Last Name :	Farbman
Attachments :	DSEIS_2576_Farbman_Original.pdf (9 kb)

IBR Draft SEIS - RECORD #2576 DETAIL

Submission Date :	11/18/2024
First Name :	Max
Last Name :	Farbman
Business/Organization/Agency :	Just Crossing Alliance
Attachments :	DSEIS_2576_Farbman_20241118_Original.pdf (6 kb)

Submission Input :

First Name:
Max

Last Name:
Farbman

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
Support for Core Project Goals
I strongly support the Interstate Bridge Replacement Project as a vital investment for our growing region. This project should prioritize:

Public Transit Expansion: To reduce reliance on single-occupancy vehicles and improve access for all.
Active Transportation Infrastructure: Safe and efficient routes for pedestrians and cyclists.
Seismic Upgrades: Ensuring the bridge is resilient and prepared for a major earthquake.

Safety Enhancements: Reducing crashes and improving travel reliability for all users.

Concerns with Traffic Modeling and Freeway Expansion

I have significant concerns about the project's justification for expanding freeway capacity. Research consistently shows that adding lanes does not alleviate traffic congestion in the long term due to induced demand. Key studies include:

Duranton and Turner (2011): Demonstrated that increasing road capacity results in proportional increases in vehicle miles traveled (VMT).

Handy and Boarnet (2014): Highlighted the limitations of highway expansion as a congestion mitigation strategy.

Given these findings, I urge the project team to provide transparent information on the traffic modeling used in the SEIS. Specifically:

What assumptions underlie the traffic and demand projections?

How have induced demand and climate impact considerations been integrated into the analysis?

Why is a second auxiliary lane deemed necessary, and what evidence supports its inclusion?

Rethinking Regional Priorities

This project offers a unique opportunity to create a bridge that reflects the future needs of our region, emphasizing climate resilience and equitable transportation options. A design that prioritizes public transit, active transportation, and seismic safety aligns with Oregon and Washington’s climate and equity goals. By contrast, perpetuating outdated norms around freeway expansion undermines these priorities.

Cost-Effectiveness and Streamlined Solutions

A more streamlined solution focused on bridge replacement, transit enhancement, and active transportation could provide significant cost savings while delivering the greatest benefits. Expanding the freeway not only risks inflating project costs but may also compromise long-term regional goals. I urge decision-makers to conduct a thorough cost-benefit analysis of alternatives that do not include additional freeway lanes.

Final Thoughts

This is a once-in-a-generation opportunity to redefine transportation in our region. Let’s commit to building infrastructure that supports a sustainable, equitable, and forward-thinking future. The SEIS should reflect a comprehensive approach that prioritizes long-term regional needs over short-term congestion relief through freeway expansion.

Thank you for your consideration.

JCA comment #: 695

IBR Draft SEIS - RECORD #2577 DETAIL

First Name :	Karen
Last Name :	Brown
Attachments :	DSEIS_2577_Brown_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #2577 DETAIL

Submission Date :	11/18/2024
First Name :	Karen
Last Name :	Brown
Business/Organization/Agency :	Just Crossing Alliance
Attachments :	DSEIS_2577_Brown_20241118_Original.pdf (2 kb)

Submission Input :

First Name:
Karen

Last Name:
Brown

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
Hello,
After reviewing the new study by the Just Crossing Alliance on the ODOT/WSDOT I-5 Bridge proposal, I agree with Just Crossing's analysis which wants to reduce the freeway component of the project. As an Oregon state and Multnomah County taxpayer I think it is too expensive and would induce more demand. I also support the study authors' support for the much needed seismic replacement, light rail extension and bike and pedestrian improvements.

JCA comment #: 694

IBR Draft SEIS - RECORD #2578 DETAIL

First Name :	Raj
Last Name :	Garg
Attachments :	DSEIS_2578_Garg_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #2578 DETAIL

Submission Date :	11/18/2024
First Name :	Raj
Last Name :	Garg
Business/Organization/Agency :	Just Crossing Alliance
Attachments :	DSEIS_2578_Garg_20241118_Original.pdf (2 kb)

Submission Input :

First Name:
RAJ

Last Name:
GARG

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
I have two main problems with the IBR.
1. At $7.5B, the cost is astronomical. NY completed two major bridge projects in 2017 at cost of $2B and $3.9B

2. It will not withstand a major earthquake
Time to go back to the drawing board.

JCA comment #: 693

IBR Draft SEIS - RECORD #2580 DETAIL

First Name :	Ryan
Last Name :	Hashagen
Attachments :	DSEIS_2580_Hashagen_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #2580 DETAIL

Submission Date :	11/18/2024
First Name :	Ryan
Last Name :	Hashagen
Business/Organization/Agency :	Icicle Industries
Attachments :	DSEIS_2580_Hashagen20241118_Original.pdf (2 kb)

Submission Input :

First Name:
Ryan

Last Name:
Hashagen

Business or Organization:
Icicle Industries

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
Please do not build the IBR project. Please fund commuter heavy rail on the existing freight tracks ASAP with frequent service from Vancouver to Oregon City and regular service from Longview to Salem.

JCA comment #: 692

IBR Draft SEIS - RECORD #2581 DETAIL

First Name :	Anonymous
Last Name :	Anonymous
Attachments :	DSEIS_2581_Anonymous_Original.pdf (7 kb) grasshopper_+15037537555_11_18_2024_181061933.mp3 (205 kb)

IBR Draft SEIS - RECORD #2581 DETAIL

Submission Date :	11/18/2024
First Name :	Anonymous
Last Name :	Anonymous
Business/Organization/Agency :	
Attachments :	DSEIS_2581_Anonymous_20241118_Original.pdf (2 kb)

Submission Input :

New Grasshopper Voicemail

Caller: [redacted]
Extension: 701 - SEIS - English Translation
Grasshopper #: [redacted]
Timestamp: 11/18/2024 10:10:44 AM (UTC-08:00) Pacific Time (US & Canada)

Read Your Voicemail "Yes, I'd like to comment that the transition is impacting our community, that it would be safe for everyone. And even I know that the money is coming from us. That was my concern, the toll and all that stuff that you guys were caring for. Um, and, and, and just that it be, the environment is safer, both for Oregon and Washington. Uh, lived here all my life. And so a big change is coming. I was about to change another world, uh, from, from my, from state to state here. Thank you."
Play this voicemail on your mobile phone or online

Sign in to your account

Find us on Twitter & Facebook

Love Grasshopper? Tell a Friend & spread the word!

IBR Draft SEIS - RECORD #2582 DETAIL

First Name :	Alon
Last Name :	Raab
Attachments :	DSEIS_2582_Raab_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #2582 DETAIL

Submission Date :	11/18/2024
First Name :	Alon
Last Name :	Raab
Business/Organization/Agency :	Just Crossing Alliance
Attachments :	DSEIS_2582_Rabb_20241118_Original.pdf (2 kb)

Submission Input :

First Name:
Alon

Last Name:
Raab

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Topic Area:
Transportation

Comment:
Dear Interstate Bridge Replacement Project committee members,
As a long-time resident of Portland who loves our city and region I urge you to reject the proposed project. Failure to look at transportation alternatives, contribution to the alarming effects of climate catastrophe, waste of public monies that should instead go to meet human needs and investing in green energy- these are but some of the reasons that I urge you to do the right thing.
Thank you,
Alon Raab

JCA comment #: 691

IBR Draft SEIS - RECORD #2583 DETAIL

First Name :	Marjorie
Last Name :	Nafziger
Attachments :	DSEIS_2583_Nafziger_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #2583 DETAIL

Submission Date :	11/18/2024
First Name :	Marjorie
Last Name :	Nafziger
Business/Organization/Agency :	Just Crossing Alliance
Attachments :	DSEIS_2583_Nafziger_20241118_Original.pdf (2 kb)

Submission Input :

First Name:
Marjorie

Last Name:
Nafziger

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
This project not only needs to provide for biking and public transit, but also needs to consider the impact on surrounding communities and environments with regard to health and racial justice.

JCA comment #: 690

IBR Draft SEIS - RECORD #2584 DETAIL

First Name :	Andrew
Last Name :	Hedges
Attachments :	DSEIS_2584_Hedges_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #2584 DETAIL

Submission Date :	11/18/2024
First Name :	Andrew
Last Name :	Hedges
Business/Organization/Agency :	Just Crossing Alliance
Attachments :	DSEIS_2584_Hedges_20241118_Original.pdf (2 kb)

Submission Input :

First Name:
Andrew

Last Name:
Hedges

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
I stand firmly opposed to the boondoggle to widen I-5 through Portland. The $7.5B estimate for the project (which will surely overrun, maybe doubling in cost) could be spent on innumerable projects with great impact for the region in economic and social terms. More lanes leads to more cars. Spend the money to improve existing infrastructure to facilitate multi-modal movement throughout the city before spending massive sums on a project that will only make things worse over the long term.

JCA comment #: 689

IBR Draft SEIS - RECORD #2585 DETAIL

First Name :	Julian
Last Name :	Bossiere
Attachments :	DSEIS_2585_Bossiere_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #2585 DETAIL

Submission Date :	11/18/2024
First Name :	Julian
Last Name :	Bossiere
Business/Organization/Agency :	Just Crossing Alliance
Attachments :	DSEIS_2585_Bossiere_20241118_Original.pdf (3 kb)

Submission Input :

First Name:
Julian

Last Name:
Bossiere

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
We need a bridge that welcomes everyone—walking, biking, and rolling and accessing public transit—by ensuring seamless, accessible pathways. By integrating open views, rest areas, and close transit access, the bridge can become a safe, enjoyable route for all.

We need for protective barriers, well-lit routes, and comfortable features like shading and rain protection, creating a welcoming space for everyone. A commitment to inclusive design prioritizes the safety and comfort of all ages, abilities, and backgrounds, especially underserved and vulnerable groups.

We want a climate-resilient bridge that supports active and public transportation, reducing reliance on cars and cutting emissions long-term.

We can’t afford to continue subsidizing driving above walking, biking, rolling, and using transit.

JCA comment #: 688

IBR Draft SEIS - RECORD #2586 DETAIL

First Name :	Aaron
Last Name :	Wolf
Attachments :	DSEIS_2586_Wolf_Original.pdf (9 kb)

IBR Draft SEIS - RECORD #2586 DETAIL

Submission Date :	11/18/2024
First Name :	Aaron
Last Name :	Wolf
Business/Organization/Agency :	Just Crossing Alliance
Attachments :	DSEIS_2586_Wolf_20241118_Original.pdf (3 kb)

Submission Input :

First Name:
Aaron

Last Name:
Wolf

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Climate Change

Comment:
Even without the climate crisis, prioritizing car traffic is not justified by any measure. Economically and socially, we need to prioritize transit and active transportation. However, because of the climate crisis, it is impossible to support the long-term maintenance of car-dependent infrastructure. The costs of the climate crisis are going to

overwhelm our systems. We need to use our resources today to build infrastructure that can be used even in a future of massive economic crashes and environmental challenges. Active transportation and efficient public transit are going to be much more feasible than maintaining so many private cars.

I urge the bridge planning to focus first and foremost on these modes that will actually serve us into the future and then minimize the expense and extent of car-focused aspects of the project. Keep in mind what we will need to have in 50 years. Do not build what you imagine we need in 2025, build what we can be confident will serve us in 2060. That means active transport and practical mass transit.

JCA comment #: 687

IBR Draft SEIS - RECORD #2587 DETAIL

First Name :	Unknown
Last Name :	Glenn
Attachments :	DSEIS_2587_Glenn_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #2587 DETAIL

Submission Date :	11/18/2024
First Name :	Unknown
Last Name :	Glenn
Business/Organization/Agency :	Shumway IBRP Action Group
Attachments :	DSEIS_2587_Glen_20241118_Original.pdf (6 kb)

Submission Input :

Shumway IBRP Action Group - Concerns About and Suggestions Regarding the Interstate Bridge Replacement Project

The Interstate Bridge Replacement project construction plans and post-construction operation will have impacts on Vancouver's Shumway Neighborhood, including vibration, audible, visual and air quality impact. Neighborhood residents look forward to working with project officials, staff, and consultants to determine ways to mitigate the negative impacts. The Shumway IBRP Action Group submits the following comments.

Neighborhood concerns include:

Auditory, visual, and air quality impacts on single and multi-family residential units, commercial properties, and Shumway Neighborhood. To mitigate adverse impacts, the Shumway IBRP Action Group will advise project planners on sound wall construction, height, and aesthetics.

Trees will be planted in the neighborhood and adjacent areas to mitigate near-road air quality issues. They will be planted as soon as the remaining construction will not damage them. The number of trees planted will be sufficient to help offset air quality impacts and enhance air quality as per recommendations made by the US Environmental Protection Agency regarding planting vegetation to mitigate near-road air quality issues. The project will ensure the survival or replacement of the trees for 10 years.

The sound wall will receive the highest standard anti-graffiti coating available at the time of its construction, and the project will ensure funding for graffiti removal for 25 years from date of completion.

The Shumway IBRP Action Group urges that the sound wall be designed to be as esthetically pleasing as possible, particularly when viewed from the west.

Construction vibration impacts. To mitigate adverse impacts of construction vibrations, the project will provide vibration monitoring for buildings and

streets from F Street east to the freeway within the neighborhood boundaries. The project will also implement any and all materials and methods available to reduce/minimize the impact of construction vibration, including, but not limited to pile driving. Any damage that occurs will be repaired promptly at project expense.

Being kept up-to-date on project schedule. While it is understood that all dates will be in flux for a period of time, neighborhood residents need to know what will happen when so that they can adjust as much as possible.

The Shumway IBRP Action Group is concerned that a design is not yet available for the Fourth Plain Boulevard overpass adjacent to the neighborhood. The Shumway IBRP Action Group will have input on the overpass design when available.

The Shumway IBRP Action Group advocates for construction of the proposed community connector between downtown Vancouver and the Vancouver National Historic Reserve to ensure that the IBR does not worsen the existing I-5 separation between these two important community resources.

The Shumway IBRP Action Group urges robust mitigation for all adverse effects of the IBR project on historic and archaeological resources. The Vancouver National Historic Reserve and Providence Academy have played important roles in community life historically and continue to do so. Project mitigation should help ensure that these significant resources, all listed on the National Register of Historic Places, are passed on to the future.

The Shumway IBRP Action Group opposes tolling until the project is complete. Residents of Shumway neighborhood are happy to pay bridge tolls after the Bridge is finished, the overpasses in Shumway neighborhood at 39th St., 33rd St., and 29th St. are complete, and all modifications to I-5 are completed. Until that time we expect to live with dirty air, construction noise and vibration, and likely a decade of increased road congestion. We cannot accept tolls along with these afflictions. We require a toll exemption for Shumway residents until completion.

IBR Draft SEIS - RECORD #2588 DETAIL

First Name :	Timothy
Last Name :	Ledlie
Attachments :	DSEIS_2588_Ledlie_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #2588 DETAIL

Submission Date :	11/18/2024
First Name :	Timothy
Last Name :	Ledlie
Business/Organization/Agency :	Just Crossing Alliance
Attachments :	DSEIS_2588_Ledlie_20241118_Original.pdf (3 kb)

Submission Input :

First Name:
Timothy

Last Name:
Ledlie

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
I would like this project to focus as much as possible on delivering world-class transit, bicycle, and pedestrian facilities and discouraging the use of single occupancy vehicles. The bike / ped path should be located on the same side as the transit to facilitate integration of those modes, and the transit tracks should be in between the roadway and the bike / ped path to create a buffer. Induced demand should be considered and as few vehicle travel lanes and interchanges as possible should be built. This project is a big opportunity for the region to take real action on global warming, environmental degradation, and livable communities by prioritizing transit, bicycles, and pedestrians and actively discouraging SOVs.

JCA comment #: 686

IBR Draft SEIS - RECORD #2589 DETAIL

First Name :	Becky
Last Name :	Tooley
Attachments :	DSEIS_2589_Tooley_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #2589 DETAIL

Submission Date :	11/18/2024
First Name :	Becky
Last Name :	Tooley
Business/Organization/Agency :	
Attachments :	DSEIS_2589_Tooley_20241118_Original.pdf (3 kb)

Submission Input :

First Name:
Becky

Last Name:
Tooley

Business or Organization:
Retired from Oregon Episcopal School

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Other

Comment:
New Bridge across the Columbia and Washington/Oregon:

First, let me acknowledge it is very difficult to design this bridge to work for everyone and include every idea. I

support the following:

1. Toll, though it pains me to say so, with a pass for those who need to transit back and forth for work.
2. Elevators at either end of the bridge to accommodate those who have a variety of disabilities. Actually, I believe this is mandatory for construction of walkways.
3. Set a total cut off for comments and begin construction!

Becky Tooley
[redacted]

JCA comment #: 685

IBR Draft SEIS - RECORD #2590 DETAIL

First Name :	Allan
Last Name :	Rudwick
Attachments :	DSEIS_2590_Rudwick_Original.pdf (9 kb)

IBR Draft SEIS - RECORD #2590 DETAIL

Submission Date :	11/18/2024
First Name :	Allan
Last Name :	Rudwick
Business/Organization/Agency :	Eliot NA
Attachments :	DSEIS_2590_Rudwick_20241118_Original.pdf (4 kb)

Submission Input :

First Name:
ALLAN

Last Name:
RUDWICK

Business or Organization:
Eliot NA

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
This Project is either going to go ahead as one of the last gasps of a failed auto-mobility at all costs paradigm or be restructured as a right-sized sane project.

if you must build this project, please take the advice of the advocates and
- Add Better Connections For Bikes!
Vancouver: The path should extend to Evergreen to prevent the need for using a 100-foot high spiral.
Portland: Add connections to the popular Vancouver/Williams corridor in addition to the planned Kenton/Denver Ave. link.
Allow for Side-by-side Integration: Transit and the multi-use path should be next to each other, for seamless transfers and ease of use. Path users should have convenient access to transit elevators, especially at elevated stations.

Make sure that you build for future Transit capacity expansion. The connection between downtown Portland and Vancouver is one of the strongest Transit corridors in the region and it has been under-served since the Yellow line was built in its current configuration.

If you want to actually do the right thing, this project should go back to the drawing board with a much lower budget and try to build for the future for less car-based transit. This means many things but I don't expect the power brokers to actually take this serious. Others have articulated good ideas better than I can recreate here. When you're ready to ACTUALLY LISTEN, we are ready to talk.

JCA comment #: 684

IBR Draft SEIS - RECORD #2591 DETAIL

First Name :	Heather
Last Name :	Heatlie
Attachments :	DSEIS_2591_Heatlie_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #2591 DETAIL

Submission Date :	11/18/2024
First Name :	Heather
Last Name :	Heatlie
Business/Organization/Agency :	Just Crossing Alliance
Attachments :	DSEIS_2591_Heatlie_20241118_Orginal.pdf (6 kb)

Submission Input :

First Name:
Heather

Last Name:
Heatlie

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
Expanding the I-5 bridge by adding lanes is an unnecessary expense.. Population trends and climate change make this expansion a waste and misspend scarce transportation funds. Furthermore the decrease in existing housing is going to exacerbate homelessness. No one willingly lives next to a freeway, except no people who

can't afford to live anywhere else.
We need reliable frequent public transit, not more cars.

JCA comment #: 683

IBR Draft SEIS - RECORD #2592 DETAIL

First Name :	Heather
Last Name :	Harmon
Attachments :	DSEIS-2592_Harmon_Original.pdf (209 kb) Ten Talents (TT 26).pdf (222 kb)

IBR Draft SEIS - RECORD #2592 DETAIL

Submission Date :	11/18/2024
First Name :	Heather
Last Name :	Harmon
Business/Organization/Agency :	Ten Talents Investments 26, LLC
Attachments :	Draft SEIS Public Comment (TT 26).pdf (206 kb)

Submission Input :

Attached please find correspondence from LeAnne Bremer on behalf of Ten Talents Investments 26, LLC which is being provided by email and postal mail. Thank you.

Heather
Harmon
Legal Assistant/Paralegal to LeAnne Bremer, Edward Decker, Kathryn Rasmussen, Beatrice Lucas, and Abigail Yeo (Pronouns: she/her/hers)
Miller Nash LLP

500 Broadway St, Ste 400 | Vancouver, WA 98660
[redacted]
Office: 360.699.4771
Email |
Insights
|
Website

LeAnne M. Bremer, P.C.
Partner
LeAnne.Bremer@MillerNash.com
360.619.7002 (direct)

November 18, 2024

REGULAR MAIL AND EMAIL: DRAFTSEIS@INTERSTATEBRIDGE.ORG

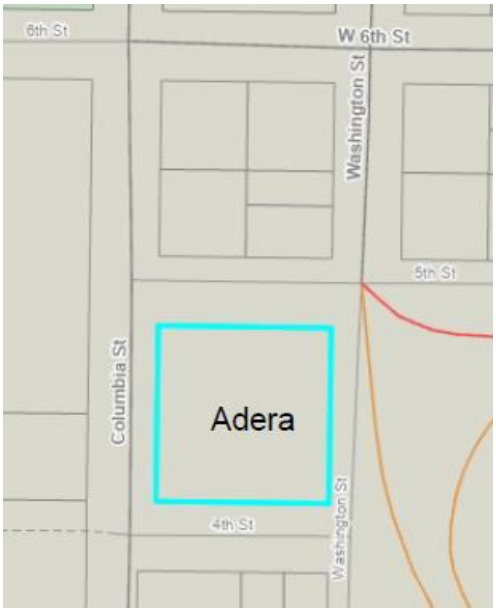
Greg Johnson
Program Administrator
Interstate Bridge Replacement Program
500 Broadway Street, Suite 200
Vancouver, WA 98660

Subject: Draft SEIS Public Comment for IBR

Dear Program Administrator Johnson:

On behalf of Ten Talents Investments 26, LLC (Owner), we are providing this comment on the draft Supplemental Environmental Impact Statement for the Interstate Bridge Replacement (IBR) by the November 18, 2024 deadline.

The Owner recently constructed a mixed-use building (residential/commercial) located at 411 Columbia Street, Vancouver, Washington (Tax Parcel No. 48320-000), referred to in this letter as the Adera parcel. The property is shown as one parcel on the most recent map from Clark County GIS:



According to the DSEIS, Chapter 3, Figure 3.3-3, it denotes the Adera parcels as two parcels (not taking into account a recent merger of property lines), and as outside the permanent impact footprint but as a partial acquisition.

Adera

However, the property is not listed in Appendix Table A4 in the Acquisitions Technical Report by address (411 Columbia Street). Thus, it is unclear where this property is discussed in the EIS and the nature of the impact that will be caused by the IBR.

As required by NEPA, Chapter 3 of the DSEIS is designed to identify, describe, and evaluate short-term and long-term property and property rights effects, and to describe measures to help avoid, minimize, or mitigate adverse effects. The DSEIS fails to do that with respect to the Adera parcel. The Owner is unable to provide meaningful comments on the DSEIS without understanding the nature and extent of the impact. The Owner is already experiencing reluctance from potential commercial tenants to sign leases, and residential tenants to sign long-term leases with the uncertainty of how the project will impact this property with specificity. The DSEIS should be more detailed in this regard so that the Owner's business is not affected well before any construction occurs.

We urge the project sponsors to identify precisely what the impacts are to the Adera property from the IBR and would welcome an opportunity to meet and discuss this matter with project staff.

Very truly yours,

LeAnne M. Bremer, P.C.

LeAnne M. Bremer, P.C.
Partner
LeAnne.Bremer@MillerNash.com
360.619.7002 (direct)

November 18, 2024

REGULAR MAIL AND EMAIL: DRAFTSEIS@INTERSTATEBRIDGE.ORG

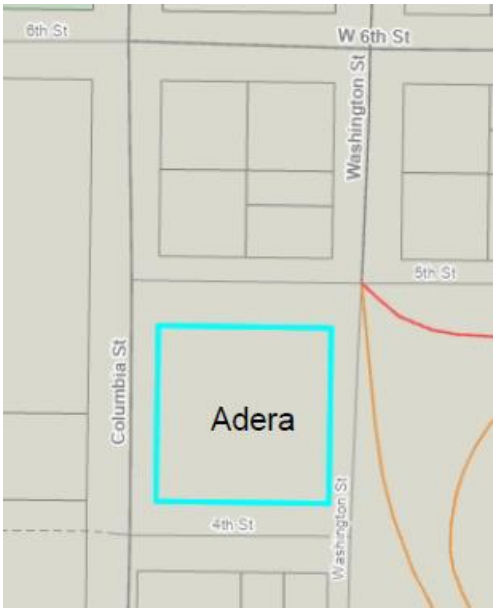
Greg Johnson
Program Administrator
Interstate Bridge Replacement Program
500 Broadway Street, Suite 200
Vancouver, WA 98660

Subject: Draft SEIS Public Comment for IBR

Dear Program Administrator Johnson:

On behalf of Ten Talents Investments 26, LLC (Owner), we are providing this comment on the draft Supplemental Environmental Impact Statement for the Interstate Bridge Replacement (IBR) by the November 18, 2024 deadline.

The Owner recently constructed a mixed-use building (residential/commercial) located at 411 Columbia Street, Vancouver, Washington (Tax Parcel No. 48320-000), referred to in this letter as the Adera parcel. The property is shown as one parcel on the most recent map from Clark County GIS:



According to the DSEIS, Chapter 3, Figure 3.3-3, it denotes the Adera parcels as two parcels (not taking into account a recent merger of property lines), and as outside the permanent impact footprint but as a partial acquisition.

Adera

However, the property is not listed in Appendix Table A4 in the Acquisitions Technical Report by address (411 Columbia Street). Thus, it is unclear where this property is discussed in the EIS and the nature of the impact that will be caused by the IBR.

As required by NEPA, Chapter 3 of the DSEIS is designed to identify, describe, and evaluate short-term and long-term property and property rights effects, and to describe measures to help avoid, minimize, or mitigate adverse effects. The DSEIS fails to do that with respect to the Adera parcel. The Owner is unable to provide meaningful comments on the DSEIS without understanding the nature and extent of the impact. The Owner is already experiencing reluctance from potential commercial tenants to sign leases, and residential tenants to sign long-term leases with the uncertainty of how the project will impact this property with specificity. The DSEIS should be more detailed in this regard so that the Owner's business is not affected well before any construction occurs.

We urge the project sponsors to identify precisely what the impacts are to the Adera property from the IBR and would welcome an opportunity to meet and discuss this matter with project staff.

Very truly yours,

LeAnne M. Bremer, P.C.

IBR Draft SEIS - RECORD #2593 DETAIL

First Name :	Alexandra
Last Name :	Parker
Attachments :	DSEIS_2593_Parker_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #2593 DETAIL

Submission Date :	11/18/2024
First Name :	Alexandra
Last Name :	Parker
Business/Organization/Agency :	
Attachments :	DSEIS_2593_Parker_20241118_Original.pdf (3 kb)

Submission Input :

First Name:
Alexandra

Last Name:
Parker

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Air Quality

Comment:
Hello,
This is a monumental build. We need to think about the long term for this project. We need to build with our futures in mind. I don't think the current project prioritizes the health and we'll being of future generations. As

designed now it will be more pollution as well as noise, and backed up traffic. We know that more and more lanes of traffic does nothing to solve our transportation issues. We need other modes like public transit and biking options tgat allow us to reduce our greenhouse gases and prioritize people. Please consider a different approach for our future. Thank you.

JCA comment #: 682

IBR Draft SEIS - RECORD #2594 DETAIL

First Name :	Heather
Last Name :	Harmon
Attachments :	DSEIS-2594_Harmon_Original.pdf (188 kb) Ten Talents (TT 29).pdf (193 kb)

IBR Draft SEIS - RECORD #2594 DETAIL

Submission Date :	11/18/2024
First Name :	Heather
Last Name :	Harmon
Business/Organization/Agency :	Ten Talents Investments 29, LLC
Attachments :	Draft SEIS Public Comment (TT 29).pdf (184 kb)

Submission Input :

Attached please find correspondence from LeAnne Bremer on behalf of Ten Talents Investments 29, LLC which is being provided by email and postal mail. Thank you.

Heather
Harmon
Legal Assistant/Paralegal to LeAnne Bremer, Edward Decker, Kathryn Rasmussen, Beatrice Lucas, and Abigail Yeo (Pronouns: she/her/hers)
Miller Nash LLP

500 Broadway St, Ste 400 | Vancouver, WA 98660
[redacted]
Office: 360.699.4771
Email |
Insights
|
Website

LeAnne M. Bremer, P.C.
Partner
LeAnne.Bremer@MillerNash.com
360.619.7002 (direct)

November 18, 2024

REGULAR MAIL AND EMAIL: DRAFTSEIS@INTERSTATEBRIDGE.ORG

Greg Johnson
Program Administrator
Interstate Bridge Replacement Program
500 Broadway Street, Suite 200
Vancouver, WA 98660

Subject: Draft SEIS Public Comment for IBR

Dear Program Administrator Johnson:

On behalf of Ten Talents Investments 29, LLC (Owner), we are providing this comment on the draft Supplemental Environmental Impact Statement for the Interstate Bridge Replacement (IBR) by the November 18, 2024 deadline.

The Owner recently acquired property from Clark Public Utilities located at 100 SE Columbia Way, Vancouver, Washington and 102 SE Columbia Way, Vancouver, WA 98661 (Project id# 38470012). According to the DSEIS, Chapter 3, Figure 3.3-3, it denotes the this property as a full acquisition. See also Appendix Table A4 in the Acquisitions Technical Report.

The legend for the above map incorrectly indicates the property is public and the appendix describes the land use as “utilities.” The DSEIS should be corrected to indicate that the property is not public, and it was purchased for office purposes. Thank you for your attention to this matter.

Very truly yours,

LeAnne M. Bremer, P.C.

LeAnne M. Bremer, P.C.
Partner
LeAnne.Bremer@MillerNash.com
360.619.7002 (direct)

November 18, 2024

REGULAR MAIL AND EMAIL: DRAFTSEIS@INTERSTATEBRIDGE.ORG

Greg Johnson
Program Administrator
Interstate Bridge Replacement Program
500 Broadway Street, Suite 200
Vancouver, WA 98660

Subject: Draft SEIS Public Comment for IBR

Dear Program Administrator Johnson:

On behalf of Ten Talents Investments 29, LLC (Owner), we are providing this comment on the draft Supplemental Environmental Impact Statement for the Interstate Bridge Replacement (IBR) by the November 18, 2024 deadline.

The Owner recently acquired property from Clark Public Utilities located at 100 SE Columbia Way, Vancouver, Washington and 102 SE Columbia Way, Vancouver, WA 98661 (Project id# 38470012). According to the DSEIS, Chapter 3, Figure 3.3-3, it denotes the this property as a full acquisition. See also Appendix Table A4 in the Acquisitions Technical Report.

The legend for the above map incorrectly indicates the property is public and the appendix describes the land use as “utilities.” The DSEIS should be corrected to indicate that the property is not public, and it was purchased for office purposes. Thank you for your attention to this matter.

Very truly yours,

LeAnne M. Bremer, P.C.

IBR Draft SEIS - RECORD #2595 DETAIL

First Name :	Maria
Last Name :	Schur
Attachments :	DSEIS_2595_Schur_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #2595 DETAIL

Submission Date :	11/18/2024
First Name :	Maria
Last Name :	Schur
Business/Organization/Agency :	Just Crossing Alliance
Attachments :	DSEIS_2595_Schur_20241118_Orginal.pdf (2 kb)

Submission Input :

First Name:
Maria

Last Name:
Schur

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
Please do not overbuild the new I-5 bridge. Please prioritize human use over motor vehicle use, especially safety. When building pedestrian/bike and public transit facilities, pretend someone will use these together and don't make them go far to connect.

JCA comment #: 681

IBR Draft SEIS - RECORD #2596 DETAIL

First Name :	Jacqueline
Last Name :	Bailey
Attachments :	DSEIS_2596_Bailey_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #2596 DETAIL

Submission Date :	11/18/2024
First Name :	Jacqueline
Last Name :	Bailey
Business/Organization/Agency :	
Attachments :	DSEIS_2596_Bailey_20241118_Orginal.pdf (3 kb)

Submission Input :

First Name:
Jacqueline

Last Name:
Bailey

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
Please reconsider the I-5 bridge tolls and construction. It will lower our property values considerably and many Hayden Island residents do most of their commerce in Vancouver because it is so much closer than Portland and these tolls will be a very big expense!! PLease consider Hayden Island residents and the enormous impact

this new construction will have on us. Also, the added expense of a MAX line seems to be an excessive and unwanted expense by most people. The MAX is bleeding money as it is, why make the bleed worse!!!

JCA comment #: 680

IBR Draft SEIS - RECORD #2597 DETAIL

First Name :	Lars
Last Name :	Gingery
Attachments :	DSEIS_2597_Gingery_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #2597 DETAIL

Submission Date :	11/18/2024
First Name :	Lars
Last Name :	Gingery
Business/Organization/Agency :	
Attachments :	DSEIS_2597_Gingery_20241118_Original.pdf (2 kb)

Submission Input :

First Name:
Lars

Last Name:
Gingery

Business or Organization:
Self

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
I-5 Bridge Replacement project needs to privilege public transit for cyclists, pedestrians and commuters beyond personal motorists. Increase induced demand for high-impact transit by enabling multi-modal transit options including cycling, walking, and enhanced public transit to connect communities. If enacting a toll structure for motorists makes fiscal sense and in turn reduces one-occupant automobile traffic, so much the better.

JCA comment #: 679

IBR Draft SEIS - RECORD #2598 DETAIL

First Name :	Jana
Last Name :	Jarvis
Attachments :	DSEIS_2598_TruckingAssociations_Original.pdf (151 kb) image001.png (5 kb) image002.png (354 bytes) image003.png (534 bytes) image004.png (451 bytes) image005.png (593 bytes) image006.png (475 bytes) OTA I-5 Bridge Letter[98].pdf (151 kb)

November 18, 2024

Interstate Bridge Replacement Program
Attn: Draft SEIS Public Comment
500 Broadway, Suite 200
Vancouver WA 98660

To Whom It May Concern:

On behalf of the Oregon Trucking Association and the Washington Trucking Associations and the thousands of trucking companies we represent, we urge you to consider the long-term capacity needs of the Interstate 5 bridge as you finalize design of this critical new infrastructure project for our region.

As part of the National Truck Network, the I-5 freeway is the only continuous north-south interstate route on the west coast connecting Canada to the Mexican border and it a vital transportation route to our local, state, regional, and national economies. The I-5 bridge provides important highway connections to the ports along the Columbia River, as well as the majority of the area's freight consolidation facilities and distribution centers.

As you know, the current I-5 bridge is over 60 years old, and it is not unreasonable to assume that the replacement bridge will also be in service for more than 50 years. We must ensure that the next iteration of the bridge not only adequately account for current capacity and demand, but that it also plans for future capacity for the next 50+ years as much as possible.

Currently, more than 114,000 freight trips carrying over $132M in commodities cross the bridge each day. That volume is projected to more than double over the next 25 years. Passenger vehicle trips have also continued to grow with population increases and are expected to increase over the next 50 years. Without additional capacity on the I-5 bridge, hours of delay on this key national freight route will increase. In addition, freight costs are expected to increase more than 90 percent over the next 20 years due to the cost of congestion without additional capacity.

We must increase vehicle capacity in any future iteration of the I-5 bridge. Our top priorities – and those of the members we represent who keep our economies moving – are congestion relief, throughput improvement, and freight mobility. Expanded roadway capacity by adding two auxiliary lanes should be the minimum strategy to address this need.

This will remain an important route for high, wide and heavy loads and these additional height and width needs should also be taken into consideration as overpasses and tolling gantries are going through the design and construction process.

Like many of us, safety remains a top priority for our members with any new bridge design. The first step to improving bridge safety is the establishment of 12-foot lane widths and wide shoulders, in addition to separation of bike, pedestrian, and freight and bus-only lanes. Finally, any future

bridge should be designed to withstand extreme geologic or weather events, limiting closures and restrictions for freight and ensuring the safety of all users.

We also recognize that the question of tolling remains a top priority for many involved in the Interstate Bridge Replacement (IBR) Program. Generally, the trucking industry is not supportive of tolling existing infrastructure. However, if the final bridge design includes enhanced capacity, support for tolling may increase. If tolls are to be implemented, we encourage them to be limited to one direction and ensure that they have predictable rates that do not put a heavier burden on freight. Unfortunately, because most trucking companies are unable to add the cost of tolling onto their contracts, they are forced to absorb the cost of tolls. Those increased costs are often rolled into higher freight costs overall, raising the price of products that are moved through toll roads. Finally, we want to ensure that any tolls will be used to pay for infrastructure and provide for future ongoing maintenance and preservation and are not diverted to other projects.

Above all else, we urge you to consider capacity needs for freight and passenger vehicles. We are extremely concerned that we are not building adequate capacity for current demand, let alone future demand. Thank you for the opportunity provide comments and we look forward to continuing conversations with the IBR Program around design specifics of the new bridge.

Sincerely,

Jana Jarvis
President & CEO
Oregon Trucking Association

Sheri Call
President & CEO
Washington Trucking Associations

November 18, 2024

Interstate Bridge Replacement Program
Attn: Draft SEIS Public Comment
500 Broadway, Suite 200
Vancouver WA 98660

To Whom It May Concern:

On behalf of the Oregon Trucking Association and the Washington Trucking Associations and the thousands of trucking companies we represent, we urge you to consider the long-term capacity needs of the Interstate 5 bridge as you finalize design of this critical new infrastructure project for our region.

As part of the National Truck Network, the I-5 freeway is the only continuous north-south interstate route on the west coast connecting Canada to the Mexican border and it a vital transportation route to our local, state, regional, and national economies. The I-5 bridge provides important highway connections to the ports along the Columbia River, as well as the majority of the area's freight consolidation facilities and distribution centers.

As you know, the current I-5 bridge is over 60 years old, and it is not unreasonable to assume that the replacement bridge will also be in service for more than 50 years. We must ensure that the next iteration of the bridge not only adequately account for current capacity and demand, but that it also plans for future capacity for the next 50+ years as much as possible.

Currently, more than 114,000 freight trips carrying over $132M in commodities cross the bridge each day. That volume is projected to more than double over the next 25 years. Passenger vehicle trips have also continued to grow with population increases and are expected to increase over the next 50 years. Without additional capacity on the I-5 bridge, hours of delay on this key national freight route will increase. In addition, freight costs are expected to increase more than 90 percent over the next 20 years due to the cost of congestion without additional capacity.

We must increase vehicle capacity in any future iteration of the I-5 bridge. Our top priorities – and those of the members we represent who keep our economies moving – are congestion relief, throughput improvement, and freight mobility. Expanded roadway capacity by adding two auxiliary lanes should be the minimum strategy to address this need.

This will remain an important route for high, wide and heavy loads and these additional height and width needs should also be taken into consideration as overpasses and tolling gantries are going through the design and construction process.

Like many of us, safety remains a top priority for our members with any new bridge design. The first step to improving bridge safety is the establishment of 12-foot lane widths and wide shoulders, in addition to separation of bike, pedestrian, and freight and bus-only lanes. Finally, any future

bridge should be designed to withstand extreme geologic or weather events, limiting closures and restrictions for freight and ensuring the safety of all users.

We also recognize that the question of tolling remains a top priority for many involved in the Interstate Bridge Replacement (IBR) Program. Generally, the trucking industry is not supportive of tolling existing infrastructure. However, if the final bridge design includes enhanced capacity, support for tolling may increase. If tolls are to be implemented, we encourage them to be limited to one direction and ensure that they have predictable rates that do not put a heavier burden on freight. Unfortunately, because most trucking companies are unable to add the cost of tolling onto their contracts, they are forced to absorb the cost of tolls. Those increased costs are often rolled into higher freight costs overall, raising the price of products that are moved through toll roads. Finally, we want to ensure that any tolls will be used to pay for infrastructure and provide for future ongoing maintenance and preservation and are not diverted to other projects.

Above all else, we urge you to consider capacity needs for freight and passenger vehicles. We are extremely concerned that we are not building adequate capacity for current demand, let alone future demand. Thank you for the opportunity provide comments and we look forward to continuing conversations with the IBR Program around design specifics of the new bridge.

Sincerely,

Jana Jarvis
President & CEO
Oregon Trucking Association

Sheri Call
President & CEO
Washington Trucking Associations

IBR Draft SEIS - RECORD #2599 DETAIL

First Name :	Matthew
Last Name :	Smith
Attachments :	DSEIS_2599_Smith_Original.pdf (9 kb)

IBR Draft SEIS - RECORD #2599 DETAIL

Submission Date :	11/18/2024
First Name :	Matthew
Last Name :	Smith
Business/Organization/Agency :	
Attachments :	DSEIS_2599_Smith_20241118_Original.pdf (8 kb)

Submission Input :

First Name:
Matthew

Last Name:
Smith

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
Dear Project Leadership,
I am writing to express my deep concern about the current $7.5 billion Interstate Bridge Replacement proposal. While I support the need to address seismic safety and aging infrastructure, the current plan represents a massive, missed opportunity to create truly sustainable transportation infrastructure for our region's future.
The proposal's emphasis on expanding highway lanes at such enormous expense fails to adequately address the pressing challenges of climate change and community connectivity. By relegating cycling and pedestrian infrastructure to secondary consideration, this project perpetuates outdated car-centric planning that we know

leads to increased emissions, reduced quality of life, and less accessible communities. The billions earmarked for additional lanes could instead be invested in robust public transit, protected bike lanes, and pedestrian-friendly infrastructure that would better serve all members of our community while advancing our climate goals. Evidence consistently shows that highway expansion projects like this one induce additional vehicle demand rather than solving congestion. As both a taxpayer and community member, I cannot support spending $7.5 billion on infrastructure that will likely worsen our environmental challenges while failing to provide meaningful, sustainable transportation alternatives. I urge you to reconsider this approach in favor of a more forward-thinking design that prioritizes people over cars.

JCA comment #: 678

IBR Draft SEIS - RECORD #2600 DETAIL

First Name :	Andrew
Last Name :	Taylor
Attachments :	DSEIS_2600_Taylor_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #2600 DETAIL

Submission Date :	11/18/2024
First Name :	Andrew
Last Name :	Taylor
Business/Organization/Agency :	
Attachments :	DSEIS_2600_Taylor_20241118_Original.pdf (2 kb)

Submission Input :

First Name:
Andrew

Last Name:
Taylor

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
I advise you to consider induced demand in the Interstate Bridge Replacement project. Building more highway will almost certainly not reduce traffic congestion. This will contribute to climate change and adverse health outcomes.

Other portions of the proposed project, including the seismic reinforcement, light rail extension, and accommodations bike and pedestrian traffic, are praiseworthy. These aspects should be prioritized over highway expansion.

JCA comment #: 677

IBR Draft SEIS - RECORD #2601 DETAIL

First Name :	James
Last Name :	Dashe
Attachments :	DSEIS_2601_Dashe_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #2601 DETAIL

Submission Date :	11/18/2024
First Name :	James
Last Name :	Dashe
Business/Organization/Agency :	Just Crossing Alliance
Attachments :	DSEIS_2601_Dashe_20241118_Original.pdf (2 kb)

Submission Input :

First Name:
james

Last Name:
dashe

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
I am writing to convey that I am primarily interested in this bridge being accessible and convenient to forms of transportation other than the private automobile. More than anything else, it needs to be a vibrant and dynamic part of our Public Transportation, Cycling, and Walking infrastructure (as well as other non-car conveyances).

JCA comment #: 676

IBR Draft SEIS - RECORD #2602 DETAIL

First Name :	Kevin
Last Name :	Flanigan
Attachments :	DSEIS_2602_Flanigan_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #2602 DETAIL

Submission Date :	11/18/2024
First Name :	Kevin
Last Name :	Flanigan
Business/Organization/Agency :	Inland Sea Maritime Group LLC
Attachments :	DSEIS_2602_Flanigan_20241118_Original.pdf (2 kb)

Submission Input :

First Name:
Kevin

Last Name:
Flanigan

Business or Organization:
Inland Sea Maritime Group LLC

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
We want to register our concerns with the proposed Interstate bridge replacement. Our property on Hayden Island is home to Schooner Creek Boat Works. We are concerned with sediments entering the bay from work in the water. We also need to allow the large sailboats to pass under the bridge. We have concerns of the tolls hindering our employees from washington. Finally we need to be sure large trucks with boats can get to the island and our location.
Please consider these concerns in the plan.
Thanks, Kevin Flanigan

JCA comment #: 675

IBR Draft SEIS - RECORD #2603 DETAIL

First Name :	Jacqueline
Last Name :	Bailey
Attachments :	DSEIS-2603_Bailey_Original.pdf (9 kb)

IBR Draft SEIS - RECORD #2603 DETAIL

Submission Date :	11/18/2024
First Name :	Jacqueline
Last Name :	Bailey
Business/Organization/Agency :	Just Crossing Alliance

Submission Input :

First Name:
Jacqueline

Last Name:
Bailey

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
The $7-12 billion cost is outrageous, while doing little to solve I-5 traffic congestion at the I-5 bridge.
2. The massive bridge will inevitably experience massive cost overruns, causing a redirection of funding meant for social programs.
3. Bridge tolls will impose a heavy and daily financial burden on all adjacent communities.
4. IBR's fixed-spans offer only 116 feet of vertical clearance above water, a full 62 ft less than today's

drawbridge which will significantly restrict larger commercial vessels from using the Columbia River to support upstream communities.
5. The 175 ft bridge height will be an eyesore that will detract from the current scenic beauty of the crossing.
6. Per the committee, IBR bridge plans will not be engineered to withstand a major Cascade Seduction Zone earthquake! Scientists are currently predicting there is about a 37% chance that a mega-thrust earthquake in this fault zone will occur in the next 50 years.
7. The IBR is an area where ground liquefaction is "expected" during a major earthquake. Liquefaction is a major threat to any bridge.
8. The Delta Park 30ft high 1/4 mile corkscrew bike & pedestrian access ramp, is too long & steep for the general public.
9. At 100ft above ground, the Vancouver transit station will be a long reach as elevator outages do happen.
10. At 30ft above ground, the Hayden Island transit station will also be a long reach subject to periodic elevator outages.
11. The 18-lane interchange planned for Hayden Island will create a very wide ugly swath of multiple pavement lanes across prime retail property, and a navigational nightmare for the visiting public and islanders.
12. The bridge's 15-year construction period will create a huge loss of quality of life, income, & property values for Hayden Island and adjacent communities.
13. Insist on an additional 120 days for public review & comment, given IBR's refusal to release full bridge information.
14. An "Independent Engineering Commission" should investigate & evaluate the option of more suitable, far less costly, and considerably more environmentally friendly "Immersed Tunnel!" If it was selected for a similar project in Vancouver BC, then why not here?

JCA comment #: 674

IBR Draft SEIS - RECORD #2604 DETAIL

First Name :	Jacqueline
Last Name :	Bailey
Attachments :	DSEIS_2604_Bailey_Original.pdf (9 kb)

IBR Draft SEIS - RECORD #2604 DETAIL

Submission Date :	11/18/2024
First Name :	Jacqueline
Last Name :	Bailey
Business/Organization/Agency :	Just Crossing Alliance
Attachments :	DSEIS_2604_Bailey_20241118_Original.pdf (5 kb)

Submission Input :

First Name:
Jacqueline

Last Name:
Bailey

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Hayden Island Issues

Comment:
The $7-12 billion cost is outrageous, while doing little to solve I-5 traffic congestion at the I-5 bridge.
2. The massive bridge will inevitably experience massive cost overruns, causing a redirection of funding meant for social programs.

3. Bridge tolls will impose a heavy and daily financial burden on all adjacent communities.
4. IBR's fixed-spans offer only 116 feet of vertical clearance above water, a full 62 ft less than today's drawbridge which will significantly restrict larger commercial vessels from using the Columbia River to support upstream communities.
5. The 175 ft bridge height will be an eyesore that will detract from the current scenic beauty of the crossing.
6. Per the committee, IBR bridge plans will not be engineered to withstand a major Cascade Seduction Zone earthquake! Scientists are currently predicting there is about a 37% chance that a mega-thrust earthquake in this fault zone will occur in the next 50 years.
7. The IBR is an area where ground liquefaction is "expected" during a major earthquake. Liquefaction is a major threat to any bridge.
8. The Delta Park 30ft high 1/4 mile corkscrew bike & pedestrian access ramp, is too long & steep for the general public.
9. At 100ft above ground, the Vancouver transit station will be a long reach as elevator outages do happen.
10. At 30ft above ground, the Hayden Island transit station will also be a long reach subject to periodic elevator outages.
11. The 18-lane interchange planned for Hayden Island will create a very wide ugly swath of multiple pavement lanes across prime retail property, and a navigational nightmare for the visiting public and islanders.
12. The bridge's 15-year construction period will create a huge loss of quality of life, income, & property values for Hayden Island and adjacent communities.
13. Insist on an additional 120 days for public review & comment, given IBR's refusal to release full bridge information.
14. An "Independent Engineering Commission" should investigate & evaluate the option of more suitable, far less costly, and considerably more environmentally friendly "Immersed Tunnel!" If it was selected for a similar project in Vancouver BC, then why not here?

JCA comment #: 673

IBR Draft SEIS - RECORD #2605 DETAIL

First Name :	Sarah
Last Name :	Risser
Attachments :	DSEIS_2605_Risser_Original.pdf (10 kb)

IBR Draft SEIS - RECORD #2605 DETAIL

Submission Date :	11/18/2024
First Name :	Sarah
Last Name :	Risser
Business/Organization/Agency :	Just Crossing Alliance

Submission Input :

First Name:
Sarah

Last Name:
Risser

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
I appreciate the opportunity to comment on the DSEIS for the Interstate Bridge Replacement.

All decisions on the Interstate Bridge Replacement project should be informed by the undeniable fact that our transportation system contributes in significant and unacceptable ways to two concerning life-threatening crises: 1) climate collapse and 2) a worsening epidemic of violent and preventable road fatalities and serious injuries. To dismiss or downplay these crises by not ensuring they are addressed to the extent possible represents a willful acceptance of future harm to both individuals and the environment and a lack of concern for the damage that the system has already inflicted; to dismiss or downplay these crises represents a clear moral failing.

To increase safety, the Interstate Bridge Replacement project must ensure complete and safe connections to the existing active transportation network. Given the significant amount of freight on and approaching the bridge, the pathways and connections for all non-vehicular (vulnerable) road users must be physically separated from all vehicular traffic, most especially where new ramps and interchanges will be constructed. To ensure safety and equity, it is imperative to ensure all road users are safe and feel safe. This will ensure that those who prefer to leave their car behind can do so without worrying about bodily harm or death.

Maximizing the separation between vehicular traffic and vulnerable road users is imperative to ensuring walking, rolling, and biking routes are used to the extent possible. Specifically, the current design for the ramp from Vancouver Way to MLK North exposes low-impact road users to conflict with freight, because the proposed route is convoluted, traveling down, across, and back up a freight-heavy on-ramp. Moreover, given the Marine Drive interchange is usually described as the most heavily used freight corridor in Oregon, additional alternatives that entirely separate walk/bike/roll travel around rather than through this important freight interchange must be studied.

Connection to the Interstate Avenue/Expo Way Walk/Bike/Roll Corridor presents a well-designed, safe separation for walk/bike/roll users along the Interstate Avenue/Expo Way corridor. This corridor provides an excellent example of the type of separation that should be extended to all Oregon active transit corridors.

The proposed design for the Marine Drive Single Point Interchange presents a potential conflict between bike lanes and freight traffic and so alternatives need to be studied, including removing bike lanes from this interchange and reinvesting saved funds into enhancing other connections. These studies should explore how the project will meet the requirements of the Oregon Bike Bill without relying on shoulders of MLK and Marine Drive for bike travel. The Oregon Bike Bill allows for more design flexibility than the IBR project acknowledges. Given this, all allowable uses of the required 1% for bike/ped must be studied with a focus on promoting vulnerable road user safety.

The Vancouver/Williams Walk/Bike/Roll Corridor's connection to the new main bridge multi-use path (MUP) is indirect and complicated. Northbound users must navigate bike lanes along the shoulders of northbound MLK, while southbound users must travel along a separated bike lane next to Union Court before joining southbound MLK on a shoulder bike lane. This is a crash waiting to happen. Additional alternatives must be explored.

The 40-Mile Loop East/West Corridor is the main trail hub for Portland and when fully completed will connect most of the other trails in the region. Ensuring connections with the 40-Mile Loop are at potential is important for ease of use and wayfinding. The proposed eastbound connection to the Bridgeton Trail portion of the 40-Mile Loop must be improved. The current design requires out-of-direction travel, routing users around a traffic circle to access the multi-use path on the west side of the Harbor Bridge. This is both inconvenient and inefficient. Alternative designs need to be considered to provide a direct connection from the Bridgeton Trail to the east-side sidewalk of the Harbor Bridge. This would encourage more users to cross the bridge as the east sidewalk offers a scenic view of North Portland Harbor and Mt. Hood. Additionally, we request that the sidewalk on the east side of the Harbor Bridge be as wide as possible and built with wide viewing areas to rest and enjoy

the view.

Ensuring non-vehicular modes of travel are as safe and efficient as possible is imperative to ensuring individuals have robust transportation choices and can, if they prefer to, leave their cars behind. Reducing vehicular traffic is essential to combating congestion; we know that it is impossible to build our way out of congestion problems. Reducing vehicular traffic addresses our dual climate and road safety crises.

JCA comment #: 672

IBR Draft SEIS - RECORD #2606 DETAIL

First Name :	Mason
Last Name :	Wordell
Attachments :	DSEIS_2606_Wordell_Original.pdf (9 kb)

IBR Draft SEIS - RECORD #2606 DETAIL

Submission Date :	11/18/2024
First Name :	Mason
Last Name :	Wordell
Business/Organization/Agency :	
Attachments :	DSEIS_2606_Wordell_20241118_Original.pdf (4 kb)

Submission Input :

First Name:
Mason

Last Name:
Wordell

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
As a N portland resident and someone who has commuted to Vancouver for work, I am very concerned about various aspects of the pedestrian safety on the bridge. I used to ride my bike and often felt unsafe - please do all you can to make this bridge accessible and safe! See specific comments below. Thank you!

1. Current design has the multi-use path on one side of the bridge and transit on the other, about 200 feet apart. We know multimodal trips are key for pedestrians and putting these transportation options side-by-side reduces out of direction travel, eases transfers, and has a number of additional benefits. The multi-use path

should be next to the MAX line, not on opposite sides of the bridge as it is currently designed.
2. Current design does not have elevators to the multi-use path. On the Vancouver waterfront, the multi-use path is approximately 100' in the air and requires a 1/2 mile long, 4.5% grade spiral ramp, and no elevator is available. This is ableist in design and due to the elevation and distance it excludes most pedestrians and folks with mobility challenges. The multi-use path needs to be lower or, at a minimum, have elevators available.
3. Current design has the multi-use path ending at the Vancouver waterfront where it descends a 1/2 mile spiral ramp at 4.5% grade. We believe the path must be extended to Evergreen Boulevard (site of the Vancouver library) along the transit line so pedestrians do not face 1/2 mile out of direction travel where they lose and must regain all the elevation. This extension also more effectively connects into the rest of the active transportation network throughout Vancouver.
4. For people to use active transportation, they must feel safe. We are asking for lighting throughout the multi-use path, separation from freeway traffic by placing the transit line between the multi-use path and the roadway, and building/planting natural and human-made shade.

JCA comment #: 671

IBR Draft SEIS - RECORD #2607 DETAIL

First Name :	Eric
Last Name :	Conner
Attachments :	DSEIS_2607_Conner_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #2607 DETAIL

Submission Date :	11/18/2024
First Name :	Eric
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Business/Organization/Agency :	
Attachments :	DSEIS_2607_Conner_20241118_Original.pdf (3 kb)

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eric

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Email:
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Phone:
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City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
Reliable Assessments: Current traffic modeling issues mean that health impact assessments (air quality, safety, etc.) are unreliable. A new, more realistic Supplemental Environmental Impact Statement (DSEIS) is needed.

Health Concerns: Increased traffic under any scenario poses serious health risks and exacerbates negative outcomes for priority communities.
Equity Priority: Freeway impacts—such as noise and tolls—disproportionately affect historically marginalized communities. Addressing this requires focused, equitable solutions.

JCA comment #: 670

IBR Draft SEIS - RECORD #2608 DETAIL

First Name :	Melissa
Last Name :	Martin
Attachments :	DSEIS_2608_Martin_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #2608 DETAIL

Submission Date :	11/18/2024
First Name :	Melissa
Last Name :	Martin
Business/Organization/Agency :	Just Crossing Alliance
Attachments :	DSEIS_2608_Martin_20241118_Original.pdf (3 kb)

Submission Input :

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Melissa

Last Name:
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Email:
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City:
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US States:
[redacted]

Zip:
[redacted]

Topic Area:
Neighborhoods and Equity

Comment:
Freeways have historically divided many neighborhoods and have had severe negative impacts for many populations especially those living close to the freeways. The new IBR design continues to rely on out of date research and does nothing to prioritize pedestrians or their safety. There must be lighting throughout the multi-use path, separation from freeway traffic by placing the transit line between the multi-use path and the roadway, and building/planting natural and human-made shade. Not only do these efforts increase safety and keep neighborhoods livable and intact, they would also add additional benefits to reduce impacts of climate change. The current design needs to be reworked.

JCA comment #: 669

IBR Draft SEIS - RECORD #2609 DETAIL

First Name :	Joseph
Last Name :	Cortright
Attachments :	DSEIS_2609_Cortright_Original.pdf (321 kb)

November 18, 2024

Interstate Bridge Replacement Program,
Attn: Draft SEIS Public Comment,
[redacted]

Comments on Draft Interstate Bridge Replacement Project EIS

Here are my comments on the Draft Supplemental Environmental Impact Statement prepared for the Interstate Bridge Replacement Project.

As written, I believe the DSEIS falls well short of meeting the statutory requirements of the National Environmental Policy Act (NEPA).

1. Information contained in the DSEIS is incomplete.

Though voluminous, the DSEIS omits many key facts and documents that are essential to ascertaining the environmental impact of the proposed alternatives. Specifically, the document lacks details explaining the assumptions and structure of models used to predict future traffic levels and land use patterns.

On February 22, 2008, I made the following public records request of the IBR:

> "I would like to request copies of all documents and reports relating to forecasts of traffic volumes, traffic speeds, and levels of congestion related to the IBR.
> I would also like to request copies of all documents and reports related to tolling and financing of the project."

Correspondence documenting this request, and acknowledging its acceptance are contained in "Cortright Request for Public Information, February 22, 2008," which is an electronic copy of email correspondence between Joe Cortright and Jay Lyman of the IBR staff, and in IBR acknowledgement of public records request.

I note that I requested these documents under Oregon and Washington public records laws in February 2008. They were not provided to me, nor were they included in the DSEIS or its appendices.

The Interstate Bridge Replacement Project has therefore violated public records laws of Oregon and Washington by failing to respond in either a timely or complete way to my February 22 request for all documents relating to tolling and traffic projections.

2. The DSEIS fails to comply with Oregon's State Transportation Plan Policy 1G that requires low cost options be implemented before building and Washington's comparable policy.

NEPA requires that a DSEIS demonstrate how alternatives comply with adopted state and local plans and policies. Federal regulations implementing NEPA make it clear that the EIS must address this issue:

> "To better integrate environmental impact statements into State or local planning processes, statements shall discuss any inconsistency of a proposed action with any approved State or local plan and laws ... [w]here an inconsistency exists, the statement should describe the extent to which the agency would reconcile its proposed action with the plan or law." 40 C.F.R. § 1506.2(d).

As part of its 1999 State Transportation Plan, the Oregon Transportation Commission adopted Policy 1G, governing implementation of major projects.

> POLICY 1G: MAJOR IMPROVEMENTS
> It is the policy of the State of Oregon to maintain highway performance and improve safety by improving system efficiency and management before adding capacity. ODOT will work in partnership with regional and local governments to address highway performance and safety needs.
> Action 1G.1
> Use the following priorities for developing corridor plans, transportation system plans, the Statewide Transportation Improvement Program, and project plans to respond to highway needs. Implement higher priority measures first unless a lower priority measure is clearly more cost-effective or unless it clearly better supports safety, growth management, or other livability and economic viability considerations. Plans must document the findings which support using lower priority measures before higher priority measures.
> 1. Protect the existing system. The highest priority is to preserve the functionality of the existing highway system by means such as access management, local comprehensive plans, transportation demand management, improved traffic operations, and alternative modes of transportation.
> 2. Improve efficiency and capacity of existing highway facilities. The second priority is to make minor improvements to existing highway facilities such as widening highway shoulders or adding auxiliary lanes, providing better access for alternative modes (e.g., bike lanes, sidewalks, bus shelters), extending or connecting local streets, and making other offsystem improvements.
> 3. Add capacity to the existing system. The third priority is to make major roadway improvements to existing highway facilities such as adding general purpose lanes and making alignment corrections to accommodate legal size vehicles.
> 4. Add new facilities to the system. The lowest priority is to add new transportation facilities such as a new highway or bypass.
> Action 1G.2

> Support any major improvements to state highway facilities in local comprehensive plans and transportation system plans only if the improvements meet all of the following conditions:
> · The improvement is needed to satisfy a state transportation objective or objectives;
> · The scope of the project is reasonably identified, considering the long range projection of need;
> · The improvement was identified through a planning process that included:
> - Thorough public involvement;
> - Evaluation of reasonable transportation and land use alternatives including measures for managing the existing transportation system and for reducing demands for highway capacity; and
> - Sufficient environmental analysis at the fatal flaw planning level.
> · The plan includes measures to manage the transportation system, but these measures will not satisfy identified highway needs during the planning period or there is a need to preserve a future transportation corridor for future needs beyond the planning period;
> · The improvement would be a cost-effective means to achieve the objective(s);
> · The proposed timing of the improvement is consistent with priorities established in corridor plans and regional transportation plans and the financing program identifies construction as being dependent on the future availability of funds;
> · Funding for the project can reasonably be expected at the time the project is ready for development and construction;
> · The local government schedules funding for local street improvements in its local transportation financing program if these are needed to attain the objectives of the major improvement; and
> · The plan includes policies and implementing measures that protect the corridor and its intended function.

Recommended corrective action. Revise the EIS to include an alternative that consists entirely of transportation demand management (TDM) strategies, including but not limited to HOV lanes, and other strategies.

3. The DSEIS violates Oregon's statutory goal of reducing greenhouse gas emissions

NEPA requires that the EIS demonstrate consistency with adopted State and local statues and plans (40 C.F.R. § 1506.2(d))

Oregon Revised Statutes 468A.205(1) sets goals of reducing greenhouse gas emissions by 10 percent from 1990 levels by 2010, and by 75 percent from 1990 levels by 2050. The DSEIS does not demonstrate how any of the alternatives affect achievement of these

goals. By enabling additional automobile travel and more decentralized, lower density development, each of the build alternatives will generate additional greenhouse gases and impede the state's ability to achieve these statutory goals.

> **468A.205 Policy; greenhouse gas emissions reduction goals.** (1) The Legislative Assembly declares that it is the policy of this state to reduce greenhouse gas emissions in Oregon pursuant to the following greenhouse gas emissions reduction goals:
>
> (a) By 2010, arrest the growth of Oregon's greenhouse gas emissions and begin to reduce greenhouse gas emissions.
>
> (b) By 2020, achieve greenhouse gas levels that are 10 percent below 1990 levels.
>
> (c) By 2050, achieve greenhouse gas levels that are at least 75 percent below 1990 levels.

Recommended corrective action: Evaluate each alternative for compliance with ORS 468A.205. Modify or discard alternatives that fail to comply with this statute. Develop other alternatives that fully comply with this law.

4. The DSEIS violates Washington's statutory goal of reducing greenhouse gas emissions

NEPA requires that the EIS demonstrate consistency with adopted State and local statues and plans (40 C.F.R. § 1506.2(d))

Washington has adopted statutory goals for the reduction of greenhouse gases. Revised Code of Washington, Chapter 80.80.020, provides:

> "(1) The following greenhouse gases emissions reduction and clean energy economy goals are established for Washington state:
>
> (a) By 2020, reduce overall greenhouse gases emissions in the state to 1990 levels;
>
> (b) By 2035, reduce overall greenhouse gases emissions in the state to twenty-five percent below 1990 levels;
>
> (c) By 2050, the state will do its part to reach global climate stabilization levels by reducing overall emissions to fifty percent below 1990 levels, or seventy percent below the state's expected emissions that year . . ."

Recommended Corrective Action: Evaluate each alternative for compliance with RCW 80.80.020. Modify or discard alternatives that fail to comply with this statute. Develop other alternatives that fully comply with this law.

5. Violates Washington's statutory goal of reducing VMT

NEPA requires that the EIS demonstrate consistency with adopted State and local statues and plans (40 C.F.R. § 1506.2(d))

The State of Washington has adopted a new statute, E2SHB 2815 of the 2008 Session, providing for a reduction of 50 percent in per capita vehicle miles traveled by 2050.

> NEW SECTION. Sec. 8. A new section is added to chapter 47.01 RCW to read as follows:
> To support the implementation of RCW 47.04.280 and 47.01.078(4), the department shall adopt broad statewide goals to reduce annual per capita vehicle miles traveled by 2050 consistent with the stated goals of executive order 07-02. Consistent with these goals, the department shall:
> (1) Establish the following benchmarks using a statewide baseline of seventy-five billion vehicle miles traveled less the vehicle miles traveled attributable to vehicles licensed under RCW 46.16.070 and weighing ten thousand pounds or more, which are exempt from this section:
> (a) Decrease the annual per capita vehicle miles traveled by eighteen percent by 2020;
> (b) Decrease the annual per capita vehicle miles traveled by thirty percent by 2035; and
> (c) Decrease the annual per capita vehicle miles traveled by fifty percent by 2050;
> **E2SHB 2815, Section 8.**

According to the DSEIS, the construction of the replacement bridge and other alternatives will facilitate an increase in vehicle miles traveled in the region of more than 40% from current levels. This is before accounting for induced demand from the additional capacity provided by the replacement bridge. This also provides further evidence that the baseline forecasts used to predict future traffic levels are not consistent with adopted state policy, and are unlikely to be realized.

Recommended Corrective Action: Evaluate each alternative for compliance with E2SHB 2815. Modify or discard alternatives that fail to comply with this statute. Develop other alternatives that fully comply with this law.

6. The DSEIS fails to properly account for induced demand.

In all of its analyses, the DSEIS uses a single set of assumptions about future land use, including the distribution of jobs and population within the metropolitan area general, and within the Project Impact Area in particular. This analysis assumes that building (or not building) this $4 billion project will have no impact whatsoever on the pattern and intensity of development over the next two decades.

This approach has two effects, both of which subvert the analysis of environment impacts and which violate NEPA. In the "No-Build" scenario, levels of development and traffic are improperly inflated, producing much higher level estimates of congestion than will actually occur. In each of the "Build" alternatives, levels of development and traffic are systematically understated.

Projections of future travel are based on assumptions about future patterns of land use, including the location and density of housing, and the location of jobs and commercial land uses.

The models that the IBR planners are using seem to be based on the "Lemming Theory" of travel behavior. Predictions that rush hour will last most of the day, and that travel speeds will fall precipitously assume that in spite of this congestion, more and more people will move to Clark County and take jobs in Oregon. Like the famous lemmings in the Walt Disney film—who leap mindlessly off the cliff even though they see other lemmings falling to their death—people keep using the I-5 bridge no matter how slow or congested it becomes. (In real life, even lemmings are smarter than this, in the Disney film, the terrified lemmings were actually chased off the cliff by the film's producers). A review of this kind of models by the Government Accountability Office concluded:

> Another source of error when calculating transportation projects' potential benefits and costs occurs because current travel demand models tend to predict unreasonably bad conditions in the absence of a proposed highway or transit investment. Travel forecasting, as previously discussed, does not contend well with land-use changes or effects on nearby roads or other transportation alternatives that result from transportation improvements or growing congestion. Before conditions get as bad as they are forecasted, people make other changes, such as residence or employment changes to avoid the excessive travel costs. Government Accountability Office (2005). Highway and Transit Investments: Options for Improving Information on Projects' Benefits and Costs and Increasing Accountability for Results. Washington, DC GAO-05-172.

The literature on induced demand shows that transportation facilities have major impacts on the local and density of development within metropolitan areas. This project is actually much larger than most projects, and more likely to have induced demand effects. The claim that resulting development is, or is not consistent with local plans says almost

nothing about whether there is induced demand. It's also worth noting that the claim that effects would not be "substantial" is never identified.

More comprehensive and independent reviews of the literature on induced demand have reached essentially the opposite conclusion from that asserted in the DSEIS. These reviews include: Avin, U., R. Cervero, et al. (2007), Litman, (2007) and Williams-Derry, C. (2007). In addition, the conclusion stated in the DSEIS about the literature is contradicted by an earlier literature review undertaken as part of the preliminary work on this project:

> "Travel responses to highway capacity improvements can affect the land use impacts discussed in the previous question. Expected travel responses include: (A) shifts in route, mode, and time of travel; (B) shifts in destinations; (C) new trips generated by new development; and (D) new trips induced by improved accessibility. Decreases in capacity can suppress demand. New trips "induced" by changes in land uses or improved accessibility are most difficult to forecast. The literature overwhelmingly suggests that induced travel is likely to increase facility demand over forecast levels, with up to half of long-term effects due to land use changes. The higher demand can often reduce or eliminate the facility's planned congestion relief, curtailing expected delay and air quality benefits. Even with little congestion relief, however, traffic widening projects provide benefits in reducing the duration of the peak period, carrying more vehicles per hour, and supporting access to a larger choice of home, work, and retail/service locations. Despite inconsistencies among studies, induced demand is generally projected to increase 0-10% for each 10% increase in road/lane miles, and 5% for every 10% travel time reduction. Local conditions, such as existing levels of congestion, traveler's value-of-time, and potential travel cost savings, affect the level of induced demand."
> Parsons Brinckerhoff, Land Use-Transportation Literature Review for the I-5 Trade Corridor Regional Land Use Committee, September 17, 2001. Pages 4-5

The DSEIS refers to this literature review, (Land Use Technical Report, Appendix A, Page A-2) and offers its own summary of its conclusions, but does not include the actual literature review as an appendix to the DSEIS. We include it here so that it will be made part of the record. Further, in our opinion, the interpretation offered in the DSEIS grossly distorts the actual conclusions of the Parsons Brinckerhoff literature review (Parsons Review). The DSEIS summary is partial, incomplete and misleading, emphasizing exceptions rather than the main conclusions, and offering no quotations of the actual wording of the Parsons Review. The Parsons Review is quite clear that within metropolitan areas, the effects of increased capacity are to disperse population, create more and longer trips, and generate induced demand for travel. See for example:

> **1.5. Households reinvest travel time savings in longer trips and more travel.**
> . . .

> Despite differences in travel conditions and opportunities across US cities over the past 20-year, people spend the same amount of time per day, on average, in travel. The stability in commuting travel times suggests that transport accessibility improvements will allow households to locate further away from jobs, and that that any travel time savings may be used for more travel.
> Parsons Brinckerhoff, Land Use-Transportation Literature Review for the I-5 Trade Corridor Regional Land Use Committee, September 17, 2001. Page 12.

Parson's conclusion is that although difficult to quantify **the literature overwhelmingly accepts the notion that induced demand exists.**

> While the literature overwhelmingly accepts the notion that induced demand exists, the quantification of its effects is less understood. Published literature suggests that for every 10% increase in lane-miles, long-term induced travel impacts range from 0-10 percent of initial traffic forecasts. This range of findings is consistent with studies indicating that heavy road building has not abetted US metropolitan congestion; however, each of the studies uses different models, assumptions and/or definitions.
> Parsons Brinckerhoff, Land Use-Transportation Literature Review for the I-5 Trade Corridor Regional Land Use Committee, September 17, 2001. Page 16.

Whether development is consistent with local land use plans or not bears no necessary relationship to whether there is induced demand. Many different levels of development (from vacant to fully allowed density with variances) are possible under any local land use plan. Asserting that the level of development is "consistent" with land use plans is a straightforward evasion of the requirement to consider the impacts of induced demand. This is simply irrelevant to determining whether there may be impacts. Local land use plans only specify the maximum amount of development that may occur in the area influenced by the project. There is a wide range of possible levels and intensities of development that are possible under these land use plans, from no development to the full maximum allowed by law.

The DSEIS fails to provide any details on the levels or amounts of development that would occur in specific areas, and whether such development would be as much as the maximum allowed under adopted land use plans, so it is impossible to determine whether land use plans represent any meaningful constraint on future development under any alternative. Alternative patterns of development, including more jobs, fewer housing units, or a better balance between jobs and housing in different parts of the region have the potential to dramatically reduce traffic volumes in the I-5 corridor. Congestion in the corridor is primarily caused by the dramatic imbalance in commuting from Washington to jobs in Oregon. Washington commuters working in the Oregon portion of the metropolitan area outnumber Oregon commuters to Washington jobs 46,226 to 8,463, a ratio of more than five-to-one, according to the Census Bureau (See Cortright Powerpoint Slide 15).

It is also clear that the DSEIS is inconsistent with administrative guidance on the question of induced demand. The Federal Highway Administration guidelines for preparing environmental impact statements clearly instruct the analysis of induced impacts: It specifically anticipates a different analysis for each alternative "substantial, foreseeable, induced development should be presented for each alternative"

> V. Environmental Impact Statement (EIS) -- FORMAT AND CONTENT
> G. Environmental Consequences
> - Land Use Impacts
>
> This discussion should identify the current development trends and the State and/or local government plans and policies on land use and growth in the area which will be impacted by the proposed project.
>
> These plans and policies are normally reflected in the area's comprehensive development plan, and include land use, transportation, public facilities, housing, community services, and other areas.
>
> The land use discussion should assess the consistency of the alternatives with the comprehensive development plans adopted for the area and (if applicable) other plans used in the development of the transportation plan required by Section 134. The secondary social, economic, and environmental impacts of any substantial, foreseeable, induced development should be presented for each alternative, including adverse effects on existing communities. Where possible, the distinction between planned and unplanned growth should be identified.
>
> Federal Highway Administration, U.S. Department of Transportation, TECHNICAL ADVISORY: GUIDANCE FOR PREPARING AND PROCESSING ENVIRONMENTAL AND SECTION 4(F) DOCUMENTS, T 6640.8A
> October 30, 1987
> (http://www.fhwa.dot.gov/legsregs/directives/techadvs/T664008a.htm)

The FHWA has developed substantial technical resources to illustrate how induced demand can be estimated for projects such as the IBR. For example, DeCourla-Souza and Cohen document long term demand elasticities of traffic with regard to travel time averaging -0.57 and ranging from -0.2 to -1.0. This means that in the long run, all other things being equal, a 10% reduction in travel time in a corridor would be associated with a 5.7% higher level of traffic. (Patrick DeCorla-Souza and Harry Cohen, Accounting For Induced Travel In Evaluation Of Urban Highway Expansion, 1998.)

If we were to apply these estimates to the travel time differences estimated by the IBR, this would suggest a dramatically higher level of traffic in the build scenarios than in the

no-build scenarios. The DSEIS would produce, according to its estimates an 18 minute travel time savings (a reduction of 40% from no-build levels). It would be hard to find another transportation project in the region—or any region—with a larger impact on highway travel times.

> Vehicles traveling northbound along I-5 from I-84 to 179th Street during the afternoon evening peak would experience a travel time decrease of 18 minutes over the 44 minute travel time for the 2030 No-Build Alternative (40 percent). (DSEIS, page 3-28)

A recent review of transportation models used in estimating future demand and project benefits, including the type used in this process, concludes:

> "Failure to account for indirect demand effects likely exaggerates the travel-time savings benefits of capacity expansion and ignores the potentially substantial land use shifts that might occur because of the marginal increase in accessibility provided."
> Avin, U., R. Cervero, et al. (2007). Forecasting Indirect Land Use Effects of Transportation Projects. Washington, DC, American Association of State Highway and Transportation Officials (AASHTO) Standing Committee on the Environment. (Page 5).

This is a problem because the DSEIS does not include any analysis of the possible effects of the bridge in inducing additional development in Clark County. From news reports, it is apparent that this was a conscious strategy on the part of project proponents to understate the effects of the project on future land use patterns. See, for example, Rivera, Dylan, "Columbia River bridge plans ignore effects of growth, Designers decide not to factor in the extra sprawl, leading to traffic and pollution, that a bigger I-5 span might bring," The Oregonian, June 22, 2008, page 1.

This story is worth quoting at length:

> "In planning a new, higher-capacity I-5 bridge over the Columbia River, the Oregon and Washington transportation departments ignored the potential for growth in North Portland and southwest Washington that could bring about yet more traffic and pollution.
>
> The Columbia River Crossing, as the bridge project is known, is designed to relieve congestion on the six-lane bridge that now frustrates Oregonians, commuters from Vancouver, and round-the-clock truckers struggling to keep their schedules.

> But a paradox lies ahead: If a bigger bridge with more lanes is built, will it create demand for housing and jobs, and yet more congestion? And will the boosted congestion spew more greenhouse gas?
>
> Transportation authorities say it could.
>
> The Oregonian has learned that **traffic forecasters involved in planning a new bridge, projected to cost $4.2 billion, were told to assume a new 12-lane bridge would not trigger any more growth than if the current bridge were simply left in place**. Yet a 12-lane bridge would handle 40 percent more cars during afternoon rush hour, according to the forecasters' calculations.
>
> Ignored is a finding by regional planners, in 2001, that eliminating the bridge's bottleneck threatened to push job and housing growth away from other parts of the metropolitan area and concentrate them in North Portland and across the river, in a rapidly expanding Clark County."
> **Rivera, 2008, (emphasis added)**

Recommended corrective action: The DSEIS should be re-written to include estimates of the impact of increased transportation capacity on the level, distribution and intensity of residential and commercial development in the Bridge Impact Area and in the metro area. Models should clearly state assumptions, and should illustrate variations between build and no-build scenarios at the TAZ level. The EIS should explicitly include alternatives that vary the composition and location of employment and households within the region in ways which would redress the imbalance between jobs and population between Clark County and the rest of the region in a manner consistent with reducing commuting flows in the I-5 corridor.

7. The DSEIS violates NEPA by failing to give separate consideration to transit alternatives and failing to give separate analysis of tolling as means of reducing congestion in the corridor.

From its very inception, the Interstate Bridge Replacement Project has billed itself as a "Interstate Bridge Replacement Project is a bridge, transit **and** highway improvement project." [1] (emphasis added). All of the build alternatives include a major increase in highway capacity. The failure to include alternatives that do not involve constructing a large additional increment of highway capacity is on its face a violation of NEPA's requirement that the DSEIS consider a wide range of reasonable options.

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[1] Banner headline on Interstate Bridge Replacement Project website. www.columbiarivercrossing.org, viewed June 20, 2008. (Emphasis added). This slogan also appears on the project's printed materials.

These agencies have a long and well-established history of having considered a diverse range of such opportunities in the past. The Environmental Impact Statement prepared on behalf of the Oregon Department of Transportation and the Federal Highway Administration for the proposed Mount Hood Freeway 35 years ago considered a wide range of alternatives including: two widths of freeways (four lane and eight lane), several types of transit (surface street, and grade separated), and a variety of demand reduction measures, including road user charges, increasing the gas tax, and changes in parking policies and land use regulations (Skidmore, Owings & Merrill, et al, 1973, see files page-9 and page-33).

Recommended corrective action: The DSEIS should be re-written with additional alternatives that include transportation demand management-only, tolling only, and transit only improvements, with no increase in highway capacity.

8. The DSEIS violates NEPA because it does not develop and evaluate a Transportation Demand Management (TDM) alternative as required by FHWA guidelines.

In its regulatory guidance on the preparation of Environmental Impact Statements for transportation projects, the Federal Highway Administration requires an analysis of transportation demand management strategies, including, but not limited to the operation of High Occupancy Vehicle lanes. The DSEIS does not include TDM as a separate alternative. The FHWA Guidance on EIS preparation provides:

> "Alternatives
> This section of the draft EIS must discuss a range of alternatives, including all "reasonable alternatives" under consideration and those "other alternatives" which were eliminated from detailed study (23 CFR 771.123(c)). The section should begin with a concise discussion of how and why the "reasonable alternatives" were selected for detailed study and explain why "other alternatives" were eliminated. The following range of alternatives should be considered when determining reasonable alternatives:
> 1. "No-action" alternative: The "no-action" alternative normally includes short-term minor restoration types of activities (safety and maintenance improvements, etc.) that maintain continuing operation of the existing roadway.
> 2. Transportation System Management (TSM) alternative: The TSM alternative includes those activities which maximize the efficiency of the present system. Possible subject areas to include in this alternative are options such as fringe parking, ridesharing, high-occupancy vehicle (HOV) lanes on existing roadways, and traffic signal timing optimization. This limited construction alternative is usually relevant only for major projects proposed in urbanized areas over 200,000 population.
> For all major projects in these urbanized areas, HOV lanes should be considered. Consideration of this alternative may be accomplished by reference to the

> regional transportation plan, when that plan considers this option. Where a regional transportation plan does not reflect consideration of this option, it may be necessary to evaluate the feasibility of HOV lanes during early project development. Where a TSM alternative is identified as a reasonable alternative for a "connecting link" project, it should be evaluated to determine the effect that not building a highway link in the transportation plan will have on the remainder of the system. A similar analysis should be made where a TSM element(s) (e.g., HOV lanes) is part of a build alternative and reduces the scale of the highway link."
> (U.S. Department of Transportation, Federal Highway Administration Technical Advisory: Guidance For Preparing and Processing Environmental and Section 4(F) Documents, T 6640.8A (October 30, 1987) (http://www.fhwa.dot.gov/legsregs/directives/techadvs/T664008a.htm)
> V. Environmental Impact Statement (EIS) -- FORMAT AND CONTENT, G. Environmental Consequences, Alternatives)

Excluding the TDM/HOV alternative from consideration is a serious omission because such measures can reduce traffic, and traffic congestion and the environmental effects associated with congestion. These alternatives can also result in lower levels of induced demand, and as noted by the Department of Transportation, enable a reduction of the scale and expense of a proposed project.

Adding a separate TDM alternative, which retained the existing bridges would hardly be a burdensome task for the project sponsors. They have already evaluated the effectiveness Traffic Demand Management as part of each build alternative (DSEIS, page S-28).

Recommended corrective action: The DSEIS should include a comprehensive TDM-only alternative.

9. The DSEIS failed to consider changes to land use plans as a means to reduce demand for travel over the I-5 corridor.

Clark County has a dysfunctional, one-way relationship with the Oregon portion of the metropolitan area. Relative to the rest of the region, it has a huge surplus of households and a huge deficit of employment. As a result, there are huge and imbalanced flows of workers commuting from housing in Clark County to jobs in the Oregon portion of the metropolitan area.

The need for this project is a direct result of the failure of Clark County to plan for and encourage the development of a sufficient number of jobs to provide local employment opportunities for its resident population. The DSEIS failed to consider whether changes in land use policies and economic development policies in Clark County to encourage

additional job development locally would reduce the expected future demand for travel across the Columbia River.

Indeed, relatively minor changes in either the job growth rate (increases) or in the population growth rate (decreases) would be sufficient to eliminate future projected increases in travel across the Columbia River. Because the IBR has not made public the Traffic Analysis Zone (TAZ) level forecasts of employment and population, nor explained the basis for these forecast, nor considered alternatives, it is impossible for those making public comments to review these materials. (As of the comment deadline the IBR had not responded to Fred Train's request that these materials be provided.)

Summary materials produced by the CRC make it clear that the traffic projections are dependent on continuing, if not accelerating sprawl in Clark County. According to the IBR, 93% of the **increase** in travel in the project corridor between now and 2030 will be the result of development in "suburban fringe Clark County." (Interstate Bridge Replacement Project, 2030 Update to Transit Markets Technical Memorandum, Table 3-3).

Clark County has developed at extremely low densities relative to the rest of the region, and this project would only contribute to a much higher level of sprawl than would be experienced in the absence of the project. For a graphic comparison of exurban sprawl in Clark County compared to the Oregon portion of the region, see the Sightline Institute's map of population growth in the region.

This seems unlikely to occur—especially in the absence of the project--because of the dramatic decline in demand for housing in more exurban areas throughout the United States. See, for example, Cortright, 2008, which documents a consistent pattern of decline in values of outlying suburban markets—including Clark County, Washington—while home values in close-in neighborhoods have remained stable or actually increased.

Again, such considerations are hardly unusual in an Environmental Impact Statement. The EIS for the Mount Hood Freeway, completed 35 years ago evaluated the effect of providing more jobs locally (in East Multnomah County) as a way of reducing the demand for travel in the proposed freeway corridor (Skidmore, Owings & Merrill, et al, 1973, see page-33).

Recommended corrective action: The DSEIS should be re-written to include an alternative that would change land use patterns in the Bridge Impact Area and in the region in ways that would reduce traffic flows in the I-5 corridor.

10. The Draft Supplemental Environmental Impact Statement violates NEPA by failing to forward separate alternatives with transit only, and highway capacity only, respectively.

NEPA requires the evaluation of reasonable alternatives to the proposed action. At the behest of Metro, the IBR considered an A plus option to keep the existing bridges, and reduce congestion through a combination of high occupancy vehicle lanes, transportation demand management, improved transit and other supporting actions. A similar combination of transit investments and minor modifications to the highway system was advanced by AORTA. The IBR chose not to advance either of these reasonable options option for full consideration in the DSEIS. This is a clear violation of the letter and spirit of NEPA.

By including both transit and a major expansion of highway capacity in all of the build alternatives, the DSEIS deprives the public and decision makers of any information about the separate value and merits of these alternatives. Clearly, it would be a simple matter to undertake either transit (light rail or busway) or highway capacity improvements separately. The DSEIS shows conclusively that highway capacity has a negative effect on traffic levels (i.e. it stimulates additional travel), while transit and tolling have the effect of reducing traffic (and associated environmental impacts).

Recommended corrective action: The DSEIS should be re-written to include one or more alternatives transit-only alternatives.

11. The DSEIS failed to consider commuter rail as an alternative

The DSEIS does not include consideration of commuter rail between Vancouver and Portland as a means of reducing demand for travel over the I-5 bridges. In 1997, the two states ran a commuter rail operation over existing rail lines. Such a system has the capacity to handle thousands of additional peak hour travelers (Oliver, 1997).

Recommended corrective action: The DSEIS should include an alternative that evaluates the impact of commuter rail as a means of reducing traffic in the I-5 corridor.

13. The DSEIS fails to allow for effect of policies to implement reduction carbon emissions—either cap and trade or carbon taxes—on growth in future demand.

Oregon and Washington have already enacted goals for the reduction of greenhouse gases (see items 2 and 3 above). The U.S. Congress is poised to enact a cap and trade regime in the next few years. These measures will require a reduction in the emission of CO2, and are likely to be achieved by policies that reduce vehicle miles traveled. The IBR's modeling assumes that there will be no additional constraint on carbon emissions. This is clearly unrealistic, and has the effect of artificially inflating the 2030 levels of traffic.

Recommended corrective action: The DSEIS should be re-written to explicitly address the likely effect of carbon restrictions on the future growth in traffic.

14. Projected Increases in Future Traffic Are Unrealistic and Undocumented.

The reliability of the IBR traffic projections is directly contradicted by recent trends in traffic in the I-5 corridor.

The IBR forecasts predict a steady increase in traffic in the I-5 corridor between now and 2030. Traffic volumes have steadily declined in the I-5 corridor over the past three years. According to records kept by the Oregon and Washington Departments of Transportation, traffic levels on I-5 bridges were down 0.5% in 2006, down 1.2% in 2007, and down 3% over the past twelve calendar months. Sherwood, C. (2008). More cross-river commuters leave cars home. The Columbian. Vancouver, WA.(May 7) 1.

The IBR forecasts that traffic in the no-build scenario on the I-5 bridges will be 184,000 vehicles per day. In 2007, traffic over the bridge, according to the Regional Transportation Council was 130,389 vehicles per day. In 1997, traffic over the I-5 bridges was 120,644 vehicles per day. The rate of increase in traffic between 1997 and 2007 was 0.8% per year (Southwest Washington Regional Transportation Council). To reach the IBR's projected level of traffic in 2030, the rate of growth in traffic in the I-5 corridor would have to nearly double from the rate experienced over the last decade, to 1.5% per annum, and maintain that rate of increase for each of the next 22 years. The DSEIS offers no explanation of why, in the face of much more expensive gasoline, anyone should expect traffic volumes to growth faster in the next two decades that they have in the last decade.

Recommended corrective action: Traffic forecasts in the DSEIS, particularly in the no-build alternative, should be revised sharply downward to reflect the decline in vehicle travel. Estimates of associated environmental effects related to traffic should be adjusted accordingly.

15. The DSEIS fails to analyze opportunity costs of spending $7.5 billion on this project in terms of reductions in other projects, and the economic impacts of this investment on the regional economy.

The Environmental Impact Statement makes it clear that this project will divert money otherwise available for other transportation investments in the Portland-Vancouver metropolitan area to the construction of the IBR.

Spending these monies on the Interstate Bridge Replacement Project will mean that they are not available for other projects in the Portland Vancouver metropolitan area. This means that the region will have upwards of $7.5 billion less in transportation improvements than would otherwise be the case. The EIS does not evaluate the economic or environmental consequences of diverting money from projects that would otherwise be funded from these sources.

In addition to tax revenues, the project assumes that a portion of the project revenues will come from tolls levied on traffic using the I-5 bridge. The toll proceeds are likely to be in excess of $100 million per year. Money spent on tolls will largely be from local households and businesses, and represents money that would otherwise be spent elsewhere in the local economy. Again, the DSEIS does not consider the economic or environmental impacts of shifting $100 million or more annually from consumer and business spending to toll payments. These impacts are likely to include lower levels of purchases of goods and services from local businesses, an associated reduction in employment at such businesses, and a loss of tax revenues from a lower level of business activity.

There will be significant economic impacts to the region for spending this $7.5 billion in construction costs, plus toll payments of $100 million or more annually indefinitely. The DSEIS does not consider the impact of these diversions of money from other uses, and therefore omits a significant impact.

The economic consequences of building regional infrastructure in a way that reduces vehicle miles traveled are significant. One recent study estimates that the residents of the Portland metropolitan area save in excess of $1 billion annually in fuel and vehicle costs because they drive shorter distances than the typical resident of a U.S. metropolitan area (Cortright, Green Dividend, 2008).

Recommended corrective action: The DSEIS should be revised to include an analysis of the economic effects and opportunity costs of spending $4 billion on this project, rather than on other transportation projects (and likely consumer expenditures) in the region.

16. The DSEIS relies on a twenty-three year-old analysis of land use effects for its assertion that there will be no significant impact on induced land use.

The DSEIS undertakes no serious analysis of induced travel. It produces a 2024 memorandum from Metro staff (Matt Bihn), claiming to summarize the work of earlier Metro modeling. The Bihn memo purports to conclude that Metro found that the previous CRC project would have minimal land use effects. (Traffic Technical Report, PDF pages 925-954).

The Bihn Memo contains a copy of a "white paper" summarizing an earlier analysis using the Metroscope model. This "white paper" is labeled "Draft Version 1" and it is not apparent that a final version was ever prepared. Although this white paper was presented to a conference in 2010, it is apparent that the Metroscope model actually was run in 2001, according to material contained in the CRC environmental documentation.

Memorandum TO: CRC Project Sponsors Council FROM: CRC Staff SUBJECT: Impacts of the CRC Project on Land Uses in Oregon and Washington (January 6, 2009)

According to press reports, the CRC staff asked Metro not to update this analysis:

> "In making their designs, bridge planners had assistance from specialists with the Metro regional government. Though Metro is nationally known for using sophisticated computer tools to study sprawl and the role of highways in it, Metro's modeling staff heeded requests by Columbia River Crossing Project staff to assume that all bridge solutions would have no influence on development patterns in North Portland and southwest Washington."
> (Rivera, 2008)

Recommended corrective action: The DSEIS should incorporate an induced demand analysis that reflects the effect of changes in highway capacity on patterns of land use in the region in the period through 2045.

17. The DSEIS is impermissibly vague about toll levels, which are a key feature of the project, and which profoundly influence traffic levels and associated environmental effects.

Toll levels are integral to the project, and simply providing an illustrative analysis of toll levels violates NEPA's requirement that the actual environmental impacts of the project be analyzed.

Tolling is not an external factor to the project's environmental effects. Toll revenues do not constitute simply a means of financing the project, but are essential to managing demand on the proposed project. For this reason, the level (dollar amount) of tolls levied is integral to the environmental impact analysis. The EIS is essentially incomplete because it fails to specify the level of tolls that will actually be charged.

It is clear that tolling is integral to determining the traffic levels associated with the build alternatives.

The DSEIS is vague about the level of tolls that would be charged, and whether tolls would be charged on just the I-5 bridge or on both the I-5 and I-205 bridges. The DSEIS uses a $2.95 peak hour toll as an example, but makes no commitment as to whether this is the actual level of toll that will be charged, or whether it would be sufficient to provide the expected amount of funding.

The uncertainty surrounding the financing arrangements for the project demonstrate that the toll levels used in the EIS are purely illustrative, and that the actual toll levels that will be charged—have not been determined, nor conclusively committed to in the EIS.

It is likely that the toll level will have to be much higher than that anticipated in the EIS. First, the project sponsors have not completed an "investment grade" toll revenue forecast, of the kind that will be required by bond issuers and bond rating agencies. Such

forecasts routinely require much more conservative assumptions than the promotional forecasts developed by transportation planning agencies. The more conservative "investment grade forecasts" are likely to produce a lower level of capital from bonding against future toll proceeds, necessitating a higher level of tolls than anticipated in the EIS.

The DSEIS does contain any meaningful environmental assessment of the traffic levels and environmental effects associated with toll levels other than the $2.00 to $2.50 peak tolls on the I-5 bridge alone.

Because the toll level has a profound effect on the amount of traffic, and the amount of traffic in turn has a profound effect on most of the serious environmental consequences associated with the project, the failure to specify an actual toll means that the EIS fails in its most basic task: estimating the environmental effects associated with each alternative.

In addition, it is apparent that tolling is the most important project component insofar as reducing congestion is concerned. The difference between tolling and not tolling the I-5 crossing represents more than 40,000 vehicles per day.

18. The Federal Highway Administration had determined to demolish the existing I-5 bridges prior to undertaking the Environmental Impact Statement.

In 2004, Federal Highway Administration official Dave Cox spoke to a transportation seminar held at Portland State University. In a discussion about options for the Interstate Bridge Replacement Project, he was asked whether the existing bridges would be preserved for any other uses. His response:

> Question (Gerald Mildner): Is the old bridge likely to stay, and serve some other purpose, or is it coming down?
>
> Answer (Dave Cox): I'm sure it's coming down.
>
> It's one of those in fact that ODOT estimates if there was an earthquake, both of those, the older one first, so what they're counting on is we would still have 205. So those bridges, the steel, I'm sure, would be salvaged, but the bridge wouldn't be there.
>
> Dave Cox, Administrator, Oregon Division, Federal Highway Administration
> Partial Transcript of Portland State University Seminar
> "The FHWA View of Transportation in Oregon"
> November 5, 2004
> (http://www.cts.pdx.edu/seminars.htm)

This clearly shows a predetermination on the part of the Federal Highway Administration to only consider options that involved the demolition of the existing Interstate 5 bridges. This predetermination colored their management of the DSEIS process, and led to the systematic—and unwarranted—exclusion of a whole series of viable alternatives that involved keeping the existing bridges.

19. "Auxiliary" Lanes are a fictional label to conceal the effects of adding capacity to the I-5 corridor.

The DSEIS describes some of the lanes on the proposed replacement bridge "auxiliary" lanes. They define auxiliary lanes on page S-18 of the DSEIS. There is no physical or functional difference between a traffic lane and a so-called auxiliary lane. In theory, the distinction is that "thru" lanes carry traffic past the exits and intersections in the bridge influence area, while auxiliary lanes carry traffic that enters and exists from these intersections in the bridge influence area.

If the replacement bridge can be defined as consisting of three thru-travel lanes and additional so-called auxiliary lanes in each direction, then the existing bridge can be similarly described as consisting of two travel lanes plus one auxiliary lane. A lane is a lane is a lane, and calling it by some other name has no effect on whether it provides capacity or not.

In addition, the project makes no justification for three auxiliary lanes. The purpose of these lanes, according to the DSEIS, is to improve safety and reduce congestion by accommodating cars and trucks entering or exiting the highway or traveling short distances between adjacent interchanges. But the DSEIS offers no analysis of why more than one auxiliary lane is required to achieve this purpose, much less any evidence that three are needed. Moreover, it violates NEPA by failing to have a range of alternatives with different numbers of lanes, regardless of the justification for those lanes. Because lanes represent additional capacity, they pose different levels of environmental impact, and the DSEIS considers only the effect of 10 or 12 lanes, and not other levels of capacity. With the project's proposed 78 foot wide roadways on two spans, the road could easily be striped for as many as twelve 12-foot travel lanes plus modest shoulders usually employed on river crossings.

20. Accident rates are exaggerated.

The DSEIS claims that the Interstate Bridge Replacement Project includes several highway segments that are among the top five percent of locations with highest numbers of accidents according to ODOT data (DSEIS, page 3-16 and 3-17). This should not be surprising given the high number of vehicles using the corridor. Data on accident rates, however, expressed as the number of accidents per million vehicle miles traveled, show that the I-5 corridor is actually no more dangerous than the Marquam Bridge, and is

actually considerably safer than the Fremont Bridge. See Cortright Powerpoint Presentation, Slide 24, and Ness (2007).

21. Importance of Interstate Bridge Replacement Project to freight is exaggerated.

The DSEIS claims that congestion in the corridor affects freight movement and harms the local economy (DSEIS, page S-4).

No evidence is presented that the changes in travel times associated with the build alternatives will have any significant impact on the regional economy over the next two decades. Most freight movement is purely local, and travels short distances. As a result it has no effect on the region's economic competitiveness (Cortright Powerpoint presentation, Slide 31). Most freight movement is low-value, time insensitive commodities like gravel and logs (Cortright Powerpoint presentation, Slide 32). The region's important and growing industries, like high technology and professional services ship trivial amounts of freight Cortright Powerpoint presentation, Slide 33). There is no correlation, at a national level, between traffic congestion and the growth of a regional economy's wholesale trade sector (Cortright Powerpoint presentation, Slide 34). Regional economists regard differences in transportation costs among regions as unimportant in determining industry location (Cortright Powerpoint presentation, Slide 35).

The IBR failed to examine the potential for meeting the region's freight needs by shifting additional freight movements to rail. The project relies on outdated projections of freight travel growth, dating from before the increase in fuel prices over the last four years. Contrary to their forecasts, overall freight movement per unit of GDP has actually been declining over the past three years (Cortright Powerpoint presentation, Slide 28). In addition, more containers have been moving by rail, with rail multi-modals shipments up 16% in the past two years (Cortright Powerpoint presentation, Slide 30).

> Modal shifts from road to rail and to inland and coastal shipping and from low-occupancy to high occupancy passenger transportation, as well as land use, urban planning and non-motorized transport offer opportunities for GHG mitigation, depending on local conditions and policies
> (Page 13)
>
> Taxes on vehicle purchase, registration, use and motor fuels, road and parking pricing
> Influence mobility needs through land use regulations, and infrastructure planning
> Investment in attractive public transport facilities and nonmotorised forms of transport
> (Page 20)
>
> International Panel on Climate Change, Contribution of Working Group III to the Fourth Assessment Report of the Intergovernmental Panel on Climate Change Summary for Policymakers, 2007.

CONCLUSION

The Draft Supplemental Environmental Impact Statement for the Interstate Bridge Replacement Project falls well short of meeting the requirements of the National Environmental Policy Act. It excludes key information that the public would need in order to ascertain the relative environmental results of different alternatives. It has systematically and unjustifiably narrowed the scope of alternatives to essentially two—do nothing or build a giant highway bridge plus transit. It has failed to seriously consider the effects of transit alone, or tolling alone, as means of mitigating congestion at far lower financial and environmental cost. It has ignored alternatives such as transportation demand management, commuter rail, and land use planning changes that would lessen highway traffic. If violates, or fails to show compliance with key state policies on transportation investment, climate change and vehicle travel. It has completely ignored the issue of induced demand, and the role that this project would play in stimulating additional low density, sprawling, auto dependent development in Clark County, and also created an intentionally exaggerated picture of development (and congestion) in the no-build scenario. It has concealed the underpinnings and assumptions of the traffic and financial models it has used to produce the traffic estimates on which its most important conclusions depend.

The purpose of an EIS ought to be to shed light on an issue, present alternatives, and facilitate discussion. Such an undertaking is neither excessively burdensome, nor an unknown art. This document is neither as comprehensive in its consideration of alternatives nor as informative as the Mt. Hood Freeway DSEIS completed more than 35 years ago (Skidmore, Owings & Merrill, et al, 1973). The Interstate Bridge Replacement

Project DSEIS, for all its heft (or perhaps because of it) does just the opposite—it conceals critical issues, it buries and ignores reasonable alternatives, and it is a profound barrier to a meaningful public dialogue about how best to deal with transportation across the Columbia River. If NEPA means anything at all, this project should go back to the drawing board and start over.

Cordially,

Joseph Cortright
[redacted]

Attachments:
Please consider the documents attached in the CD and electronic files accompanying this letter an integral part of my comments on the DSEIS.

Documents Prepared by Joseph Cortright

Cortright Request for Public Information, February 22, 2008
FILE: Cortright_Request_February_2008.pdf

Cortright, Financial Risk Memorandum
FILE: Cortright_Financial_June_2008.pdf

Cortright, Planning Commission Letter
FILE: Cortright_Planning_May_2008.pdf

Cortright, Planning Commission Powerpoint Presentation
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http://www.columbiarivercrossing.org/FileLibrary/TechnicalReports/2030TransitTravelMarketsTechnicalMemo.pdf
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Rivera, Dylan, "Columbia River bridge plans ignore effects of growth, Designers decide not to factor in the extra sprawl, leading to traffic and pollution, that a bigger I-5 span might bring," The Oregonian, June 22, 2008, page 1.
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Note: Document captured as page images, multiple pages per image; citations refer to image numbers, not original document page numbers.

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IBR Draft SEIS - RECORD #2610 DETAIL

First Name :	Melissa
Last Name :	Martin
Attachments :	DSEIS_2610_Martin_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #2610 DETAIL

Submission Date :	11/18/2024
First Name :	Melissa
Last Name :	Martin
Business/Organization/Agency :	
Attachments :	DSEIS_2610_Martin_20241118_Orginal.pdf (3 kb)

Submission Input :

First Name:
Melissa

Last Name:
Martin

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
Both states acknowledge and have new policies aimed at reducing emissions reductions. One well known way to do this is to decrease single occupancy travel in cars and to increase the use of active transit/public transit. These options also have societal benefits of reduced traffic noise and increase in health and well being. The design of the bridge should reflect and integrate and prioritize active and public transit over single occupancy vehicles and trucking. Instead the current design has the multi-use path on one side of the bridge and transit on the other, about 200 feet apart. The multi-use path should be next to the MAX line. Multimodal trips are key for pedestrians - putting these transportation options side-by-side has many benefits such as reduced out of

direction travel and eased transfers.

JCA comment #: 668

IBR Draft SEIS - RECORD #2611 DETAIL

First Name :	Pascal
Last Name :	Le Guilly
Attachments :	DSEIS_2611_LeGuilly_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #2611 DETAIL

Submission Date :	11/18/2024
First Name :	Pascal
Last Name :	Le Guilly
Business/Organization/Agency :	Schooner Creek Boat Works
Attachments :	DSEIS_2611_LeGuilly_20241118_Original.pdf (3 kb)

Submission Input :

First Name:
Pascal

Last Name:
Le Guilly

Business or Organization:
Schooner Creek Boat Works

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Navigation

Comment:
We are concerned that sediment will enter our bay (Canoe Cove) from the piling placement and the fixed span. We have customers with large sailboats who will not go under, including those with masts taller than 120 feet. Additionally, the toll will affect our employees and customers in Washington.
Also, we have large vessels coming and leaving by truck, and we are concerned about height restrictions for the trucking company.
Thank you
Pascal Le Guilly

JCA comment #: 667

IBR Draft SEIS - RECORD #2612 DETAIL

First Name :	Erik
Last Name :	Memmott
Attachments :	DSEIS_2612_Memmott_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #2612 DETAIL

Submission Date :	11/18/2024
First Name :	Erik
Last Name :	Memmott
Business/Organization/Agency :	
Attachments :	DSEIS_2612_Memmott_20241118_Original.pdf (3 kb)

Submission Input :

First Name:
erik

Last Name:
memmott

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
Biking and walking have to be on the same side of the highway as transit. This is non-negotiable.

JCA's concerns about data and assumptions need to be addressed in writing. They bring up important

questions about the true benefits of this project. I support the project in general, but I think the benefits of the project need to be clearer and more substantial, considering the expense and disruption.

With this being such a high-profile project, it is critical that this bridge shine as an example of inter-state, inter-agency collaboration around a modern, resilient bridge that supports a safe and convenient transportation system for all users, with an emphasis on vulnerable users and traffic/congestion mitigation.

The CRC and current IBR measures are not adequate to this task. It is vital that the lead agencies recognize this and make the necessary changes to correct course.

JCA comment #: 666

IBR Draft SEIS - RECORD #2613 DETAIL

First Name :	Jami
Last Name :	Dwyer
Attachments :	DSEIS_2613_Dwyer_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #2613 DETAIL

Submission Date :	11/18/2024
First Name :	Jami
Last Name :	Dwyer
Business/Organization/Agency :	
Attachments :	DSEIS_2613_Dwyer_20241118_Original.pdf (2 kb)

Submission Input :

First Name:
Jami

Last Name:
Dwyer

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Topic Area:
Neighborhoods and Equity

Comment:
Increasing freeway traffic will have a negative effect on the people who live nearby.

JCA comment #: 665

IBR Draft SEIS - RECORD #2614 DETAIL

First Name :	Jami
Last Name :	Dwyer
Attachments :	DSEIS_2614_Dwyer_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #2614 DETAIL

Submission Date :	11/18/2024
First Name :	Jami
Last Name :	Dwyer
Business/Organization/Agency :	
Attachments :	DSEIS_2614_Dwyer_20241118_Original.pdf (2 kb)

Submission Input :

First Name:
Jami

Last Name:
Dwyer

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Topic Area:
Climate Change

Comment:
We should consider the future. Individual cars burning fossil fuel is not sustainable.

JCA comment #: 664

IBR Draft SEIS - RECORD #2615 DETAIL

First Name :	Trisha (Allison)
Last Name :	Hall
Attachments :	DSEIS-2615_DOI_Original.pdf (283 kb)

United States Department of the Interior

OFFICE OF THE SECRETARY
Office of Environmental Policy and Compliance
911 NE 11th Avenue, Suite 661
Portland, Oregon 97232

IN REPLY REFER TO:
ER24/0411
4111

November 18, 2024

Chris Regan, IBR Program Environmental Manager
IBR Program Draft SEIS
500 Broadway Street, Suite 200
Vancouver, WA 98660

Dear Mr. Regan,

The U.S. Department of the Interior (Department), through the National Park Service (NPS) and the U.S. Geological Survey (USGS), has reviewed the draft Supplemental Environmental Impact Statement (SEIS) for the IBR Program I-5 crossing of the Columbia River at Vancouver, Washington. The Department offers the following comments for use in developing the final SEIS for this project.

The Columbia River Crossing Project (CRC) Locally Preferred Alternative (LPA) was updated to form the Modified LPA in 2022, including a new pair of Columbia River bridges built west of the existing bridge and including light-rail transit extension of the Metropolitan Area Express (MAX) line. The modified LPA includes three bridge configurations -- double-deck truss bridges with fixed spans, single-level bridges with fixed spans, and single-level bridges with movable spans. It also includes one and two auxiliary lane design options. The single-level bridge options will consider either a girder, extradosed, or finback bridges. In addition, there is an option to shift the I-5 mainline up to 40 feet westward in downtown Vancouver between the Washington State Route 14 (SR-14) and Mill Plain Boulevard, and an option to eliminate the existing C Street ramp in downtown Vancouver.

As a cooperating agency, NPS is committed to their work with IBR representatives over the years on the IBR and previously on the CRC. As recognized in the previous FEIS and ROD for the CRC project and as presented in this SEIS, all configurations and options will have significant adverse impacts to Fort Vancouver National Historic Site (FOVA) and the Vancouver National Historic Reserve (VNHR). It is critically important to address ways to avoid, minimize, or mitigate the baseline effects to these historic properties and park while addressing the cumulative effects of the numerous options that may be implemented. We recommend that these mitigations and cumulative effects be clearly described in the final SEIS.

Section 4(f) Comments

The NPS appreciates the detail contained in the 4(f) evaluation within the draft SEIS. We agree with the findings that the project will constitute a use of FOVA and the VNHR. We concur that FOVA and the VNHR are nationally significant properties with greater significance as a whole than as individually eligible historic properties, and that FOVA is a nationally significant unit of the National Park System. The NPS prefers the option of shifting the replacement crossing alignment west and removing the C Street ramp to reduce harm to FOVA and the VNHR; however, we do recognize that this option may not be feasible or cost-effective. While we are unable to concur that the LPA and the modified LPA is a *de minimus* action, we would be able to concur with an action that shifts the replacement crossing to an intermediate alignment that would lessen some of the direct impacts on FOVA and the VNHR.

Of the three bridge configurations, the single level bridge with girder design reduces the visual effects of all the options and maintains cleaner lines and symmetry. The extradosed and finback single level and double deck truss bridge options will introduce disruptive features on the viewshed that will diminish the integrity of setting and feeling of FOVA and the VNHR.

Fort Vancouver National Historic Site and the Vancouver National Historic Reserve

The draft SEIS correctly identifies that FOVA was congressionally designated a National Monument in 1948 and then expanded in 1961 to a National Historic Site. In 1966, FOVA was listed in the National Register of Historic Places. The NPS Organic Act of 1916, and the enabling legislation for FOVA, requires preservation and conservation of its natural, historical, and recreational resources therein, for the enjoyment of current and future generations. The draft SEIS also correctly identifies that the U.S. Congress created the VNHR in 1996, including properties affiliated with FOVA, including Officer's Row, the West Vancouver Barracks, and Old Apple Tree Park. Over one million visitors come to FOVA and the VNHR each year to learn about the history of the Pacific Northwest region, and their importance as nationally significant, cultural and heritage sites for which losses cannot be easily mitigated.

We recommend that the SEIS clearly acknowledge that adverse effects to FOVA and the VNHR will not change to any significant degree with any of the prospective changes in methods or delivery, although shifting the replacement crossing to the west and eliminating the C Street ramp would reduce some of the direct impacts to the historic properties and park. While use of the single level bridge with girder design will partially reduce the visual impacts, the project on the whole will adversely affect FOVA and the VNHR. The NPS objects to any design change that would increase direct effects to these properties. We also recommend for environmental analysis in the SEIS to address the loss of integrity of setting and feelings associated with the new bridges and how it would impact the ability of descendant communities, including Native American Tribes and Native Hawaiian Organizations, and the public, to fully engage with the location of the Fort Vancouver Village. The NPS encourages the FHWA and FTA to address in the SEIS increased noise and loss of visibility of key landscape features associated with the IBR, including installation of sound mitigation and identification of gathering places and interpretation to address the loss of access to nationally significant spaces that are of high significance and sacred to Indigenous communities.

We anticipate that construction-related physical damage through ground disturbance will occur to FOVA and the VNHR, especially through damage to the Fort Vancouver Village. Sites associated with the Fort Vancouver Village, 45CL163 and 45CL300, are highly sensitive.

Physical damage would cause permanent damage and destruction of historic places with Native American, Native Hawaiian, and other cultural associations. Resolution of adverse effects associated with this damage should reflect the significance of the site under multiple National Register criteria, including Criteria A and D. We recommend for the resolution of adverse effects to address the cultural significance of the remains of houses, structures, belongings, and heirlooms to Indigenous communities and the long-term cultural trauma and dysphoria associated with cumulative impacts to the site. The NPS encourages FHWA and FTA to clearly state in the SEIS that any direct damage that cannot be avoided should be addressed through consultation and should develop a data recovery plan to mitigate the effects to these properties. The data recovery plan would address the need to appropriately curate the information and belongings from these sites. Identification of a replacement cultural space, exhibit planning, might be considered to appropriately interpret these belongings and their past and present cultural context for the benefit of descendant communities, including Native American Tribes and Native Hawaiian Organizations, as well as better understanding by the public, fitting their high level of national significance.

The NPS supports restoration of historic landscape elements including the Fort Vancouver allée and including the surrounding landscape of the Village and prairie extending from 5th Street at I-5 along the eastern edge of I-5 to State Route 14 and then extending east of the Vancouver Land Bridge and south of the Pearson Field runway to the eastern edge of the project. We encourage plantings appropriate to the Fort Vancouver cultural landscape including restoration of its native prairie, and vegetation of exposed soil created by the project using native vegetation indigenous to the disturbed locations.

We agree that construction impacts, including vibration, could result in the physical destruction of the Post Hospital rendering it unusable or in partial or total collapse. There might be vibration impacts to the NCO Family Quarters within the Vancouver Barracks Historic District, part of the VNHR. We, therefore, recommend seismic rehabilitation of the Post Hospital and other buildings that might be adversely affected by construction vibration. In addition, the NPS encourages the FHWA and FTA to prepare a seismic monitoring plan for both the Post Hospital and the NCO Family Quarters to ensure that construction impacts will not damage these contributing buildings.

Auditory impacts associated with the IBR will diminish the integrity of contributing buildings and sites on the west side of Officer's Row and elsewhere in the VNHR. Noise abatement in these areas such as sound barriers and landscaping for aesthetic purposes could mitigate traffic noise and lessen the adverse auditory effects associated with the diminishment of integrity of setting and feeling of the VNHR.

Text-specific comments:

- Page 3.8-27, third bullet: Replace "Heritage" with "Historic"
- Page 4-53, first paragraph after "Passive Recreational Activities and Features, second sentence: Replace "immediately north of the HBC Kanaka Village" with "immediately north of the Fort site reconstruction".
- Page 4-53, last paragraph, second sentence: Replace text from the CRC project with "Construction of two of the village houses is complete and another house and landscape reconstruction is planned".

Section 6(f) Comments

The proposed Interstate Bridge Replacement Program previously noted potential impacts to sites in Portland, Oregon and Vancouver, Washington which have been assisted by the Land and Water Conservation Fund (LWCF). The State of Oregon and the State of Washington partner with the National Park Service to fund assist the listed sites. Please continue to consult with the state partners for any potential impacts, whether temporary or permanent. State coordinators may team up for coordinated response, otherwise please coordinate with each state.

State of Washington
Ms. Myra Barker, Compliance Specialist
c/o Washington Recreation and Conservation Office
1111 Washington St, SE
Olympia, WA 98501
myra.barker@rco.wa.gov
(360) 867-8508

State of Oregon
Oregon Parks and Recreation Department
725 Synner Street NE, Suite C
Salem, OR 97301

Ms. Michele Scalise, Grants and Community Program Manager
michele.scalise@oprd.oregon.gov, (503) 507-2249

Ms. Nohemi Enciso, LWCF Program Coordinator, Compliance
nohemi.enciso@oprd.oregon.gov, (503) 480-9092

Mr. Julian Fedorchuk
LWCF Compliance Coordinator
julian.fedorchuk@oprd.oregon.gov, (503) 689-3009

Project Impacts:
- City of Portland, Oregon, 41-001568, East Delta Park
- City of Vancouver, Washington, 53-00682 Burnt Bridge Creek Trail, Phase 2

(NOTE: 53-00595 Burnt Bridge Creek Acquisition may not be impacted.)

Potential Disturbance to a USGS Streamgage

The USGS operates streamgages along streams throughout the United States to collect water quantity and quality data for a variety of purposes. Continuous operation of USGS) streamgages is essential for our stakeholders. These streamgages have permanent infrastructure and are vulnerable to disruption when nearby construction or dredging occurs in the vicinity of them. The USGS maintains an active stream gage within the project area of the proposed I-5 crossing on the Columbia River at Vancouver, WA.

USGS Station Number	USGS Station Name	USGS Site Status	State	County
14144700	Columbia River at Vancouver, WA	Current	WA	Clark

The Oregon Water Science Center should be contacted and given sufficient advanced notice before construction near this active USGS streamgage. Efforts should be made to both preserve the streamgage and minimize impacts to the data collected at the site.

The NPS looks forward to continuing their participation as a cooperating agency for the IBR project, and their work with the FHWA and FTA towards a resolution of the IBR project's adverse effects to FOVA and the VNHR. For questions regarding Fort Vancouver National Historic Site or Vancouver National Historic Reserve, please contact Tracy Fortmann (tracy_fortmann@nps.gov). For questions regarding LWCF, please contact Andrea Messam (andrea_messam@nps.gov). Streamgage questions should be directed to Jon Janowicz (jjanowicz@usgs.gov). If you have any other questions or concerns, please don't hesitate to contact me at allison_hall@ios.doi.gov.

We appreciate the opportunity to comment.

Sincerely,

T. Allison Hall
Regional Environmental Officer

IBR Draft SEIS - RECORD #2616 DETAIL

First Name :	ECY
Last Name :	RE SWRO SEPA COORDINATOR
Attachments :	WA Ecology_Original.pdf (292 kb) image001.png (5 kb) 2024404445 ECY Comments.pdf (180 kb)

STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
Southwest Region Office
PO Box 47775, Olympia, WA 98504-7775 • 360-407-6300

November 18, 2024

Chris Regan, SEPA Contact
WA State Department of Transportation
Southwest Region
11018 Northeast 51st Circle
Vancouver, WA 98668-1709

Dear Chris Regan:

Thank you for the opportunity to comment on the draft environmental impact statement for the Interstate Bridge Replacement Program Project as proposed by WSDOT, FHWA, FTA. The Department of Ecology (Ecology) reviewed the environmental checklist and has the following comment(s):

SHORELANDS & ENVIRONMENTAL ASSISTANCE: Penny Kelley, [redacted]

1. Section 2.2.2.1 WAC 2002. National Pollution Discharge Elimination System Permit Program, WAC 173-220; reference is made to Section 401 water quality certifications in relation to the NPDES permit program. We recommend removing reference to Section 401 because it is not related to WAC 173-220 (the heading for this section under 2.2.2.1). Instead, we recommend clarifying that the program operates under state laws as part of the NPDES program created under Section 402 of the Clean Water Act. Section 401 is addressed in section 8.2.1 of the SEIS technical report and does not need to be included here.

2. Section 8.2.3 Wetland/Waters Removal-Fill Permits: The information provided in this section is not accurate. When reviewing impacts to waters of the state (including wetlands) for 401 water quality certifications, an official request must be submitted to the department. The Joint Aquatic Resource Permits Application can be included as supporting documentation to the request but is not the official request. We recommend updating this section with the following change:

   > In Washington, when reviewing impacts to wetlands or waters under Section 401 of the CWA, a request for a Section 401 Certification must be submitted to Department of Ecology. A pre-filing meeting request must be submitted to Ecology 30 days prior to sending the official request for a Section 401 Certification. Both forms for these requests can be obtained through the Department of Ecology, as well as information on what supporting documentation should be included. A permit application is also submitted to the USACE prior to submitting the official request for a 401 Certification.

3. Under 7.1.1 Regulatory Requirements, the fourth bullet contains information that appears to be incorrect and a possible typo. Construction and Municipal stormwater permit requirements are not issued through CWA Section 401 but CWA Section 402. We suggest changing 401 to 402.

SOLID WASTE MANAGEMENT: Derek Rockett [redacted]

All grading and filling of land must utilize only clean fill. All other materials may be considered solid waste and permit approval may be required from your local jurisdictional health department prior to filling. All removed debris resulting from this project must be disposed of at an approved site. Contact the local jurisdictional health department or Department of Ecology for proper management of these materials.

TOXICS CLEANUP: Sam Meng [redacted]

Within 0.25 mile from the project area, there are three cleanup sites including Lahti Property Site (Cleanup Site ID: 11477), Aeon Apartment II Site (Cleanup Site ID: 17045), and Vancouver Port of Red Lion Hotel (Cleanup Site ID: 2033). The sites are awaiting cleanup.

To search and access information about these sites see https://ecology.wa.gov/Spills-Cleanup/Contamination-cleanup/Cleanup-sites. If contamination is suspected, discovered, or occurs during construction, testing of the potentially contaminated media must be conducted. If contamination of soil or groundwater is readily apparent, or is revealed by sampling, the Department of Ecology must be notified. To notify Ecology, contact the Environmental Report Tracking System Coordinator at the Southwest Regional Office at (360) 407-6300. For assistance and information about subsequent cleanup and to identify the type of testing that will be required, contact Sam Meng with the Toxics Cleanup Program at the Southwest Regional Office at [redacted].

TOXICS CLEANUP: Sandy Smith [redacted]

If contamination is discovered or occurs during elodea removal, testing of the potentially contaminated media must be conducted. If contamination of soil, sediment, or water is readily apparent, or is revealed by testing, the Department of Ecology must be notified. Contact the Environmental Report Tracking System Coordinator at the Southwest Regional Office at (360) 407-6300. For assistance and information about subsequent cleanup and to identify the type of testing that will be required, contact Sandy Smith with the Toxics Cleanup Program at the Southwest Regional Office at [redacted].

Ecology's comments are based upon information provided by the lead agency. As such, they may not constitute an exhaustive list of the various authorizations that must be obtained or legal requirements that must be fulfilled in order to carry out the proposed action.

If you have any questions or would like to respond to these comments, please contact the appropriate reviewing staff listed above.

Department of Ecology
Southwest Regional Office

(JKT:202404445)

cc: Penny Kelley, SEA
Derek Rockett, SWM
Sam Meng, TCP

STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
Southwest Region Office
PO Box 47775, Olympia, WA 98504-7775 • 360-407-6300

November 18, 2024

Chris Regan, SEPA Contact
WA State Department of Transportation
Southwest Region
11018 Northeast 51st Circle
Vancouver, WA 98668-1709

Dear Chris Regan:

Thank you for the opportunity to comment on the draft environmental impact statement for the Interstate Bridge Replacement Program Project as proposed by WSDOT, FHWA, FTA. The Department of Ecology (Ecology) reviewed the environmental checklist and has the following comment(s):

SHORELANDS & ENVIRONMENTAL ASSISTANCE: Penny Kelley, (360) 280-8856

1. Section 2.2.2.1 WAC 2002. National Pollution Discharge Elimination System Permit Program, WAC 173-220; reference is made to Section 401 water quality certifications in relation to the NPDES permit program. We recommend removing reference to Section 401 because it is not related to WAC 173-220 (the heading for this section under 2.2.2.1). Instead, we recommend clarifying that the program operates under state laws as part of the NPDES program created under Section 402 of the Clean Water Act. Section 401 is addressed in section 8.2.1 of the SEIS technical report and does not need to be included here.

2. Section 8.2.3 Wetland/Waters Removal-Fill Permits: The information provided in this section is not accurate. When reviewing impacts to waters of the state (including wetlands) for 401 water quality certifications, an official request must be submitted to the department. The Joint Aquatic Resource Permits Application can be included as supporting documentation to the request but is not the official request. We recommend updating this section with the following change:

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3. Under 7.1.1 Regulatory Requirements, the fourth bullet contains information that appears to be incorrect and a possible typo. Construction and Municipal stormwater permit requirements are not issued through CWA Section 401 but CWA Section 402. We suggest changing 401 to 402.

SOLID WASTE MANAGEMENT: Derek Rockett (360) 995-3176

All grading and filling of land must utilize only clean fill. All other materials may be considered solid waste and permit approval may be required from your local jurisdictional health department prior to filling. All removed debris resulting from this project must be disposed of at an approved site. Contact the local jurisdictional health department or Department of Ecology for proper management of these materials.

TOXICS CLEANUP: Sam Meng (360) 999-9587

Within 0.25 mile from the project area, there are three cleanup sites including Lahti Property Site (Cleanup Site ID: 11477), Aeon Apartment II Site (Cleanup Site ID: 17045), and Vancouver Port of Red Lion Hotel (Cleanup Site ID: 2033). The sites are awaiting cleanup.

To search and access information about these sites see https://ecology.wa.gov/Spills-Cleanup/Contamination-cleanup/Cleanup-sites. If contamination is suspected, discovered, or occurs during construction, testing of the potentially contaminated media must be conducted. If contamination of soil or groundwater is readily apparent, or is revealed by sampling, the Department of Ecology must be notified. To notify Ecology, contact the Environmental Report Tracking System Coordinator at the Southwest Regional Office at (360) 407-6300. For assistance and information about subsequent cleanup and to identify the type of testing that will be required, contact Sam Meng with the Toxics Cleanup Program at the Southwest Regional Office at (360) 999-9587.

TOXICS CLEANUP: Sandy Smith (360) 999-9588

If contamination is discovered or occurs during elodea removal, testing of the potentially contaminated media must be conducted. If contamination of soil, sediment, or water is readily apparent, or is revealed by testing, the Department of Ecology must be notified. Contact the Environmental Report Tracking System Coordinator at the Southwest Regional Office at (360) 407-6300. For assistance and information about subsequent cleanup and to identify the type of testing that will be required, contact Sandy Smith with the Toxics Cleanup Program at the Southwest Regional Office at (360) 999-9588.

Ecology's comments are based upon information provided by the lead agency. As such, they may not constitute an exhaustive list of the various authorizations that must be obtained or legal requirements that must be fulfilled in order to carry out the proposed action.

If you have any questions or would like to respond to these comments, please contact the appropriate reviewing staff listed above.

Department of Ecology
Southwest Regional Office

(JKT:202404445)

cc: Penny Kelley, SEA
Derek Rockett, SWM
Sam Meng, TCP

IBR Draft SEIS - RECORD #2617 DETAIL

First Name :	Tom
Last Name :	Curtin
Attachments :	DSEIS-2617_Curtin_Original.pdf (6 kb)

IBR Draft SEIS - RECORD #2617 DETAIL

Submission Date : 11/18/2024
First Name : Tom
Last Name : Curtin
Business/Organization/Agency :

Submission Input :

First Name:
Tom

Last Name:
Curtin

Email:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
I absolutely oppose the IBR project.

JCA comment #: 663

IBR Draft SEIS - RECORD #2618 DETAIL

First Name :	Joseph
Last Name :	Cortright
Attachments :	DSEIS-2618_Cortright_Original.pdf (401 kb) Cortright_Induced_Travel_Sophistry.pdf (422 kb)

IBR Draft SEIS - RECORD #2618 DETAIL

Submission Date :	11/18/2024
First Name :	Joseph
Last Name :	Cortright
Business/Organization/Agency :	
Attachments :	Cortright_Induced_Travel_Sophistry.pdf (422 kb)

Submission Input :

The DSEIS fails to comply with NEPA because it makes no serious effort to analyze induced demand. The project's traffic technical report relies on a14-year old summary of Metro findings of the previous project using a now obsolete and no longer supported model of transportation/lane use effects.

The IBR fails to consider or use more up-to-date a peer-reviewed methodologies for analyzing induced travel, including the induced travel calculator.

Instead, the Oregon Department of Transportation specifically forbids making use of the induced travel calculator, even though it has been peer-reviewed, and is supported by the scientific literature.

The DSEIS falsely assumes that because land use is subject to regulation in Oregon and Washington that the addition of freeway capacity cannot change land use patterns. This is false. There are many possible patterns of development that are legal within the Oregon and Washington systems, and all of the available scientific evidence shows that the region will have a lower density, more car-dependent development pattern with higher vehicle miles of travel if road capacity is expanded as contemplated here.

In addition, as I have documented elsewhere in my comments, the travel projections used in the IBR calling for a 25 percent increase in total vehicle miles traveled are at odds with the Portland region's land use and transportation plans, which assume a 12 percent reduction in vehicle miles traveled.

cityobservatory.org /flat-earth-sophistry/
<https://cityobservatory.org/flat-earth-sophistry/>Flat Earth SophistryBy Joe Cortright17-22 minutes 12/30/2022

The science of induced travel is well proven, but state DOTs are in utter denial

*Widening freeways not only fails to reduce congestion, it inevitably

results in more vehicle travel and more pollution*

The Oregon Department of Transportation has published a technical manual banning the consideration of induced travel in Oregon highway projects.

The Oregon Department of Transportation wants to pretend that induced travel doesn't exist. Using federal funds, it has written a new handbook on how to plan for highways that makes some preposterous and undocumented claims about the induced travel. It explicitly prohibits planners and consultants from using peer-reviewed, scientifically based tools, like the Induced Travel Calculator, developed by the University of California Sustainable Transportation Center, and mandated by the California Department of Transportation for the analysis of the environmental effects of freeways.

The tortured denial by the Oregon Department of Transportation engages in some blatant sophistry that tries to create a false distinction between "latent" demand and "induced demand." If we just call it "latent demand" then somehow it doesn't count.

Turn to page 6-79 of ODOT's newly published "Analysis Procedures Manual <https://www.oregon.gov/ODOT/Planning/Documents/APMv2_Ch6.pdf>". The APM is a technical guide to using traffic data to plan future roadways. Here you find a red-bordered text box with a bold graphic STOP sign, explicitly banning planners and analysts from using the induced travel calculator. "The use of these calculator types shall not be used to estimate induced and latent demand effects on ODOT-funded projects . . . "

<https://i0.wp.com/cityobservatory.org/wp-content/uploads/2022/10/ODOT_Latent_Calculator.png>

This kind of foot-stomping, hand-waving denial is reminiscent of the Catholic church's harrumphing denials of Copernicus and Galileo's observations of the universe. But induced travel is extremely well-established science, and Oregon DOT shows itself to be modern day a flat-earth science denier.

What the Scientific Literature Shows

The economic and scientific literature on induced travel is unambiguous: Increasing road capacity, by whatever means, lowers the perceived cost of driving and results in more travel. The phenomenon is now so well-established that its called the "Fundamental Law of Road Congestion <http://cityobservatory.org/the-fundamental-global-law-of-road-congestion/> ."

The economics are straightforward: expanding the supply of highways lowers the cost of driving, and faced with a lower cost of driving, people drive more. In this classic diagram, the supply curve shifts outward (to the right) lowering the cost of driving and increasing the number of miles driven.

<https://i1.wp.com/cityobservatory.org/wp-content/uploads/2022/11/Handy_Volker_InducedXY_chart.png>

The best available science shows that this generated travel follows a unit elasticity: a one percent increase in roadway capacity creates a one percent increase in vehicle miles traveled. To claim otherwise is to simply be in denial about the fundamental economics of the price elasticity of demand <http://cityobservatory.org/transportation-planners-flunk-econ-101-price-elasticity-of-demand/>: lowering the price of something (in this case the time cost of using a particular roadway) tends to increase the volume consumed.

There have been numerous studies which have all reached similar conclusions about the empirical nature of this relationship. Two of the leading scholars on the subject, the University of California's Susan Handy and James Volker present a meta-analysis of studies of induced travel. Their results are summarized on the following table. In studies in the US and in other developed countries, there's a strong and consistent relationship between expanded roadways and additional travel. In the long run, estimates of the elasticity of induced travel are around 1.0, meaning that a one percent increase in road capacity tends to lead to a one percent increase in vehicle miles traveled.

<https://i1.wp.com/cityobservatory.org/wp-content/uploads/2022/10/Handy-Volker_Short_LIt.png>

The authoritative *Traffic Engineering Handbook* <https://bit.ly/3PyX3Er> summarizes the literature on induced demand as follows:

. . . the long-run elasticities of VMT with respect to road space is generally 0.5 to 1.0 after controlling for population growth and income, with values of almost 1.0, suggesting that new road space is totally filled by generated traffic where congestion is relatively severe.

Kara Kockelman (2011), "Traffic Congestion," Chapter 22, *Transportation Engineering Handbook*, McGraw Hill .

ODOT asserts that it can ignore all this literature. ODOT argues, in essence, that even thought the consensus is for a unit elasticity, that

here in Oregon, contra all this published literature, it believes the real coefficient of these equations is zero: that a one percent increase in roadway capacity would lead to no increase whatsoever in travel demand. In essence, the ODOT Analysis Methods Manual tells planners to ignore induced demand entirely.
Latent demand is induced demand.

The apparent justification for this conclusion is that there's something called "latent" demand that's different from "induced" demand.

Oregon DOT falsely claims that there is a difference between "latent" demand and "induced" demand. Here's what they are saying…

Latent Demand – this is demand for transportation that consumers do not utilize because they cannot afford the cost or it is not currently available. Latent demand responses are typically associated with network limitations, such as capacity constraints . . . *Latent demand does not include induced demand.*

Induced demand – new demand for travel that did not exist prior to the build scenario. This is above and beyond forecasted and latent demand associated with planned land use,* it is demand that is the result of changes in land use* (zone changes) or economic conditions that create new trips.

(ODOT Analysis Procedures Manual, June 2022, emphasis added).

Denying that "latent" demand is induced demand is not supported in the literature. No other study uses these terms in this fashion, or makes this distinction between "induced" and "latent" demand. This is ODOT's Through the Looking Glass <https://www.goodreads.com/quotes/12608-when-i-use-a-word-humpty-dumpty-said-in-rather> moment:

"When I use a word," Humpty Dumpty said, in rather a scornful tone, "it means just what I choose it to mean- neither more nor less."

Ben and Jerry observe the latent demand for ice cream every year when they drop the price of a cone to zero, and people line up around the block. These are all people who would love to have ice cream, if only it were free. The lines around the block are "induced ice cream eating", as the zero price of ice cream converts "latent demand" into "actual demand."

But we know empirically that travel changes rapidly in response to

available highway capacity. That's true both in the case of expansions and contractions in capacity. People rapidly and radically change their travel distances and trip making in response to changes in capacity. Predicted "carmaggedons" in the face of reductions of capacity from bridge closures <http://cityobservatory.org/carmaggedon_trunnion/>, highway collapses <http://cityobservatory.org/carmaggedon-stalks-atlanta/>, construction projects <http://cityobservatory.org/the-week-observed-2019-may10/>, demolitions <http://cityobservatory.org/seattle_carmaggedon/> of highways, and other similar events cause traffic disappearance.

Ultimately, this is pure sophistry: Whether you call it "latent" demand or "induced" demand, the effects are exactly the same: Adding more capacity to existing roadways increases the volume of vehicle travel.

Oregon's Analysis Procedures Manual vs. California's Transportation Analysis Framework

While OregonDOT has just published its "Analysis Procedures Manual" banning the use of induced travel calculators, its California counterpart, Caltrans has published guidelines that require the use of such a calculator to highway projects in the Golden State. What leads one state DOT to require the calculator, while the other bans it. Who is right?

<https://dot.ca.gov/-/media/dot-media/programs/sustainability/documents/2020-09-10-1st-edition-taf-fnl-a11y-new-.pdf>

Let's consider the processes and documentation that went into the CalTrans and ODOT publications. CalTrans adopted its Framework after a years-long study and review effort. It brought in outside experts, it conducted and published a thorough literature review, and the Framework itself was the subject of public meetings. As the Framework document explains:

Caltrans convened an expert panel of academics and practitioners through UC Berkeley Tech Transfer. The panel chair presented the group's conclusions to stakeholders at a virtual Technical Roundtable prior to finalizing the group's recommendations. Caltrans and State partners have accepted the panel's recommendations, which are reflected in the guidance documents.

In contrast, the Oregon Manual has no identified author, cites no academic literature, has not been subject to outside review by persons independent from the Oregon Department of Transportation. It is an unsubstantiated, unscientific polemic.

It's also possible (and indeed likely) that even without changes in land use, households and businesses will sort themselves differently among the

existing stock of land and buildings. If travel is fast and free, people may choose to live at housing a great distance from their jobs (or conversely, commute to jobs at great distance from their homes). If travel is slower or more expensive, they may seek housing nearer their job, or look for jobs only closer to home in order to minimize the time and money costs of travel. The redistribution of population and employment among existing buildings in response to changes in travel costs is something that ODOT denies is even possible.

What's deeply ironic about the denial of induced demand is that highway departments have been counting on it to create an unending demand for their services for decades. Building more and wider roads has led to more driving and more car ownership, which has jammed existing roads to capacity, and led to calls for further widening. It's a Sisyphean <http://cityobservatory.org/sisyphus-meets-bob-the-builder/> cycle that leads to ever more traffic and ever more spending on roads, which is just what highway departments and their vendors want.

Induced Demand and Land Use Changes

As Litman <https://www.vtpi.org/gentraf.pdf> points out there are first-, second-, third- and fourth-order effects from highway capacity increases. Initially travel times get faster (first order). That prompts people to change whether, when, where and by what means they travel.(second order). The shift in travel patterns and accessibility may then prompt changes in land use (third order). Finally, the cumulative effect of a shift to sprawl and greater auto dependence may further amplify trip taking (fourth-order).

Roadway expansion impacts tend to include:

First order. Reduced congestion delay, increased traffic speeds.

Second order. Changes in time, route, destination and mode.

Third order. Land use changes. More dispersed, automobile-oriented development.

Fourth order. Overall increase in automobile dependency. Degraded walking and cycling conditions (due to wider roads and increased traffic volumes), reduced public transit service (due to reduced demand and associated scale economies, sometimes called the Downs-Thomson paradox), and social stigma associated with alternative modes.

The ODOT view is that the "second order" effects—changing times, routes,

additional trip taking, and more miles traveled—somehow don't count as "induced travel" if no changes in land use happen. Or, alternatively, if that travel is accurately predicted by a traffic model or anticipated in a plan (i.e. "above and beyond forecasted") , that it also doesn't count.

The Land Use Red Herring

But let's have a look at the second part of the argument: That the transportation agency can ignore that part of induced demand that results from land use changes in response to the expansion of roadways, and that somehow, because Oregon has a system of land use planning that those effects simply don't occur here. ODOT's rhetorical position is that "Induced demand" can only occur in response to land use changes, and land use changes are impossible under Oregon's land use system.

<https://i2.wp.com/cityobservatory.org/wp-content/uploads/2022/10/ODOT_APM_Induced_defn.png>

The Oregon Department of Transportation likes to pretend that the only form of induced travel that is real is that which accompanies changes in land use. And they argue that because Oregon has strict land use laws, that investments in travel infrastructure can't produce changes in land use.

In general, Oregon faces low risk related to induced demand because of the state's strong land use laws, which exist to prevent sprawl. Changes to land use must be approved by local jurisdictions, so *a facility project cannot induce demand just by itself*.

ODOT's reasoning is this: Induced demand only occurs when there is a land use change that necessitates a change in a land use plan. Because Oregon has land use plans, transportation projects somehow can't create induced demand. This reasoning is wrong for two reasons: First, as we've already explained, "latent" demand–changes in transportation behavior in response to a capacity increase–can happen even without any change in land use, and this "latent" demand is, according to all the scientific literature "induced demand." The second reason is that Oregon's land use law doesn't prevent or preclude changes in land use in response to changes in transportation infrastructure.

What this misses is that the land use system is a permissive framework, and within that legal framework many possible patterns of population and employment are possible. For example, new housing can be built in infill locations (near transit, and proximate to more jobs) or it can be built at the urban periphery. Both outcomes are possible under the Oregon land use system. The key point about induced demand is that more investment in transportation infrastructure will make lower density, more far flung

development even more attractive. And, importantly, a significant part of the demand for Oregon roadways comes from places not subject to the Oregon land use system (i.e. suburban Clark County Washington). Investing in more transportation capacity across the Columbia River will facilitate more low density sprawl in Washington, and added automobile trips on the I-5 and I-205 bridges as large fractions of these suburban and exurban households live and shop in Oregon.

A lobbying campaign to deny induced demand

There's little question that ODOT officials are uncomfortable with the science of induced travel. And they're eager to do anything they can to minimize or misrepresent or discredit the application of this scientific fact to transportation planning. For example, in 2021, ODOT sought funding through AASHTO (the lobbying organization of state highway agencies) to get a project funded to dispute induced demand. Bike Portland <https://bikeportland.org/2021/12/14/is-is-possible-to-upgrade-freeways-without-inducing-demand-odot-wants-to-know-342255> reported that its proposal made it clear that the agency was primarily interested in generating talking points to push back against application of induced demand to metro area freeway expansion projects.

"While the road building era of the 1950s freeway networks is essentially complete, even minor strategies and investment intended to optimize existing roadway system assets are increasingly facing opposition in the name of "induced demand"…"

Even as it is busily ignoring or denying the science of induced travel, the Oregon Department of Transportation regularly repeats <http://cityobservatory.org/odots-climate-lie-an-idle-theory-of-greenhouse-gas-emissions/> the discredited myth <http://cityobservatory.org/urban-myth-busting_idling_carbon/> that idling in traffic is a significant source of greenhouse gas emissions that can be reduced by widening roadways.

<https://i0.wp.com/cityobservatory.org/wp-content/uploads/2022/11/ODOT_APM_FHWA.png>

<https://i1.wp.com/cityobservatory.org/wp-content/uploads/2022/11/ODOT_APM_Stop_Sign.png>

Traffic Projections that Deny Induced Travel Lack Scientific Integrity

To the extent that ODOT's guidance limits what is included in a federally required environmental impact statement, it's steadfast refusal to cite any sources for its claims, and its consistent ignorance of published scientific literature on induced travel constitutes a violation of the

scientific integrity requirements of NEPA.

§ 1502.23 Methodology and scientific accuracy.

Agencies shall ensure the professional integrity, including scientific integrity, of the discussions and analyses in environmental documents. Agencies shall make use of reliable existing data and resources. Agencies may make use of any reliable data sources, such as remotely gathered information or statistical models. *They shall identify any methodologies used and shall make explicit reference to the scientific and other sources relied upon for conclusions in the statement*. Agencies may place discussion of methodology in an appendix. Agencies are not required to undertake new scientific and technical research to inform their analyses. Nothing in this section is intended to prohibit agencies from compliance with the requirements of other statutes pertaining to scientific and technical research.

Chuck Marohn, writing at Strong Towns <https://www.strongtowns.org/journal/2022/4/4/ignoring-induced-demand-is-engineering-malpractice> explains
that traffic engineers treat travel demand as a fixed and immutable quantity–they've build models and a world view that pretends that people will travel just as much whether they build a project or not. This view helps justify building ever more roads, but doesn't reflect reality and ought to be treated as professional malpractice:

The concept of "travel demand" is where traffic engineers have stunted their own intellectual development more than perhaps anywhere else. And they've done so for two reasons. First, it makes their models easier to run. It's really difficult (impossible, really) to create models that factor in the behavioral responses of humans. Better to just assume a static level of demand, even though that assumption is a farce (remember, *traffic **models** are all about justifying projects*, not actually modeling what is going on in the world).

Second, it allows traffic planners and engineers to position themselves and their craft as responding to demand, not creating it. That's an important distinction because it allows them to be confident in what they do without having to struggle with the underlying reasons that things aren't working.
. . .

Engineering in the auto age is about building—build, build, build—and not about optimizing or managing systems. When your ethos is merely to build more stuff, you develop myths and models that support that ethos. That's

what you're seeing in the patently absurd assertion that additional capacity does not generate more trips. . . .

In 2022, denying how highway expansions induce people to drive more should be considered professional malpractice.

US Secretary of Transportation Pete Buttigieg clearly endorses the science of induced demand. In a recent television interview <https://www.bloomberg.com/news/features/2021-09-28/why-widening-highways-doesn-t-bring-traffic-relief>, Buttigieg told Chris Wallace:

. . . here's an entire science to this. And we have a lot of research partners. We have our own research institution called the Volpe Institute, which is in Cambridge, Massachusetts. . . . one of the challenges we have right now is you got more and more people in the country more and more people on the road. Just how to be smart about that. For example,it turns out that sometimes when you just want to get a lot of traffic on the roadway, and you just added lanes to it, all you get is more traffic, because it actually makes more people want to drive on that road and then you're right back where you were.

--
Joe Cortright
[redacted]

cityobservatory.org /flat-earth-sophistry/

Flat Earth Sophistry | City Observatory

By Joe Cortright ⋮ 17-22 minutes ⋮ 12/30/2022

The science of induced travel is well proven, but state DOTs are in utter denial

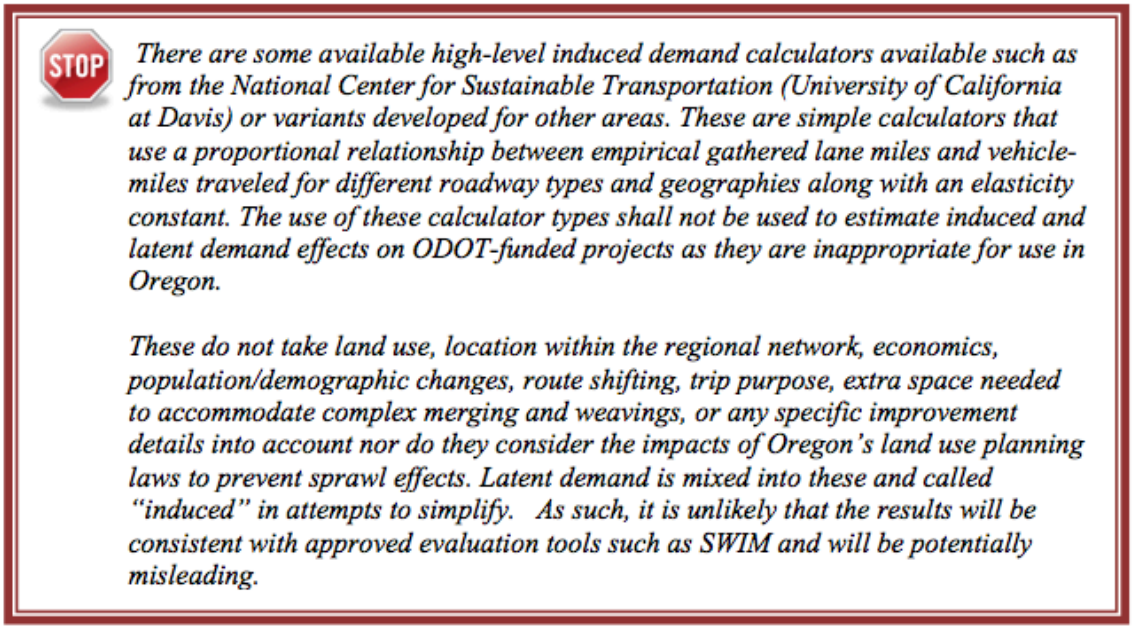
Widening freeways not only fails to reduce congestion, it inevitably results in more vehicle travel and more pollution

The Oregon Department of Transportation has published a technical manual banning the consideration of induc projects.

The Oregon Department of Transportation wants to pretend that induced travel doesn't exist. Using federal funds, it h how to plan for highways that makes some preposterous and undocumented claims about the induced travel. It ex consultants from using peer-reviewed, scientifically based tools, like the Induced Travel Calculator, developed b Sustainable Transportation Center, and mandated by the California Department of Transportation for the analysis o freeways.

The tortured denial by the Oregon Department of Transportation engages in some blatant sophistry that tries to crea "latent" demand and "induced demand." If we just call it "latent demand" then somehow it doesn't count.

Turn to page 6-79 of ODOT's newly published "Analysis Procedures Manual". The APM is a technical guide to u roadways. Here you find a red-bordered text box with a bold graphic STOP sign, explicitly banning planners and an travel calculator. "The use of these calculator types shall not be used to estimate induced and latent demand effects o



This kind of foot-stomping, hand-waving denial is reminiscent of the Catholic church's harrumphing denials of Coperni of the universe. But induced travel is extremely well-established science, and Oregon DOT shows itself to be mo denier.

What the Scientific Literature Shows

The economic and scientific literature on induced travel is unambiguous: Increasing road capacity, by whatever mean driving and results in more travel. The phenomenon is now so well-established that its called the "Fundamental Law o

The economics are straightforward: expanding the supply of highways lowers the cost of driving, and faced with a low more. In this classic diagram, the supply curve shifts outward (to the right) lowering the cost of driving and increasing

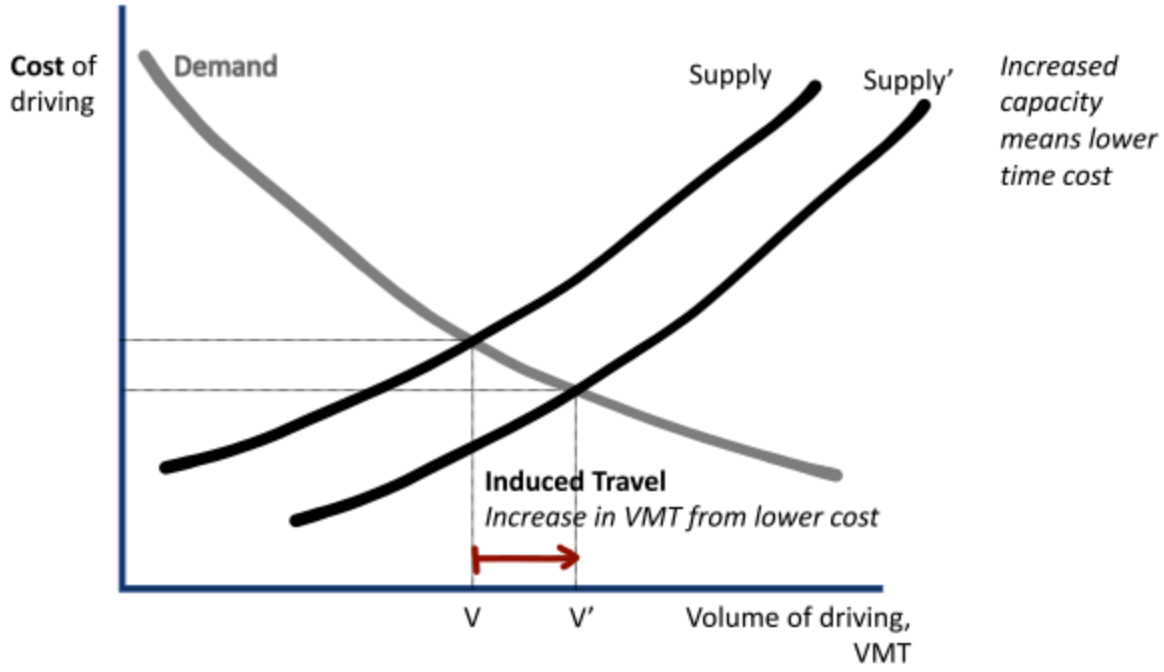


Figure 2. Elastic Demand for Vehicle Travel and the Induced Travel Effect

The best available science shows that this generated travel follows a unit elasticity: a one percent increase in ro percent increase in vehicle miles traveled. To claim otherwise is to simply be in denial about the fundamental econ demand: lowering the price of something (in this case the time cost of using a particular roadway) tends to increase th

There have been numerous studies which have all reached similar conclusions about the empirical nature of this re scholars on the subject, the University of California's Susan Handy and James Volker present a meta-analysis of st results are summarized on the following table. In studies in the US and in other developed countries, there's a stro between expanded roadways and additional travel. In the long run, estimates of the elasticity of induced travel are a percent increase in road capacity tends to lead to a one percent increase in vehicle miles traveled.

Authors	Geography	*Elasticities*	
		Short Run	Longer Run
Fulton et al. (2000)	United States (Maryland, North Carolina, Virginia, Washington, DC)	0.46–0.51	-
Noland & Cowart (2000)	United States	0.28–0.76	-
Cervero & Hansen (2002)	United States (California)	0.59	0.79 (5 year)
Duranton & Turner (2011)	United States	-	1.03 (10 year)
Su (2011)	United States	0.07	0.26
Melo et al. (2012)	United States	-	0.98
Graham et al. (2014)	United States	-	0.77
Hymel (2019)	United States	0.32–0.37	0.89–1.06
González & Marrero (2012)	Spain	0.11–0.17	0.27–0.31
Hsu & Zhang (2014)	Japan	-	1.24–1.30 (3-5 year)
		-	1.24–1.34 (3-5 year)
Chen & Klaiber (2020)	China	0.99	-
García-López et al. (2020)	Europe (29 countries)	-	1.21 (5 year)

The authoritative *Traffic Engineering Handbook* summarizes the literature on induced demand as follows:

> . . . the long-run elasticities of VMT with respect to road space is generally 0.5 to 1.0 after controlling for popula
> with values of almost 1.0, suggesting that new road space is totally filled by generated traffic where congestion i
>
> Kara Kockelman (2011), "Traffic Congestion," Chapter 22, *Transportation Engineering Handbook*, McGraw Hill .

ODOT asserts that it can ignore all this literature. ODOT argues, in essence, that even thought the consensus is f
Oregon, contra all this published literature, it believes the real coefficient of these equations is zero: that a one
capacity would lead to no increase whatsoever in travel demand. In essence, the ODOT Analysis Methods Manual t
demand entirely.

Latent demand is induced demand.

The apparent justification for this conclusion is that there's something called "latent" demand that's different from "indu

Oregon DOT falsely claims that there is a difference between "latent" demand and "induced" demand. Here's what the

> Latent Demand – this is demand for transportation that consumers do not utilize because they cannot afford the available. Latent demand responses are typically associated with network limitations, such as capacity constra **does not include induced demand.**
>
> Induced demand – new demand for travel that did not exist prior to the build scenario. This is above and beyo demand associated with planned land use, **it is demand that is the result of changes in land use** (zone conditions that create new trips.
>
> (ODOT Analysis Procedures Manual, June 2022, emphasis added).

Denying that "latent" demand is induced demand is not supported in the literature. No other study uses these terms distinction between "induced" and "latent" demand. This is ODOT's Through the Looking Glass moment:

> "When I use a word," Humpty Dumpty said, in rather a scornful tone, "it means just what I choose it to mean- ne

Ben and Jerry observe the latent demand for ice cream every year when they drop the price of a cone to zero, and pe These are all people who would love to have ice cream, if only it were free. The lines around the block are "induced price of ice cream converts "latent demand" into "actual demand."

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Transportation Analysis Framework
First Edition*

Evaluating Transportation Impacts of
State Highway System Projects

Let's consider the processes and documentation that went into the CalTrans and ODOT publications. CalTrans a years-long study and review effort. It brought in outside experts, it conducted and published a thorough literature re was the subject of public meetings. As the Framework document explains:

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- **Induced demand** – new demand for travel that did not exist prior to the build scenario. This is above and beyond forecasted and latent demand associated with planned land use, it is demand that is the result of changes in land use (zone changes) or economic conditions that create new trips. Induced demand can be identified on a regional scale when there is an increase in demand that cannot be attributed to other types of demand, such as demand diverting from one facility to another. Induced demand typically occurs over a long time span and may relate to land use changes outside of the study area or a reduction in the cost of accessing destinations previously too costly to access.

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The contents of this report reflect the views of the Oregon Department of Transportation, Transportation Planning Analysis Unit, which is responsible for the facts and accuracy of the information presented herein. The contents do not necessarily reflect the official views or policies of the Federal Highway Administration.

Points that are critical for the analysis process are displayed as a box in italics with the stop sign icon.

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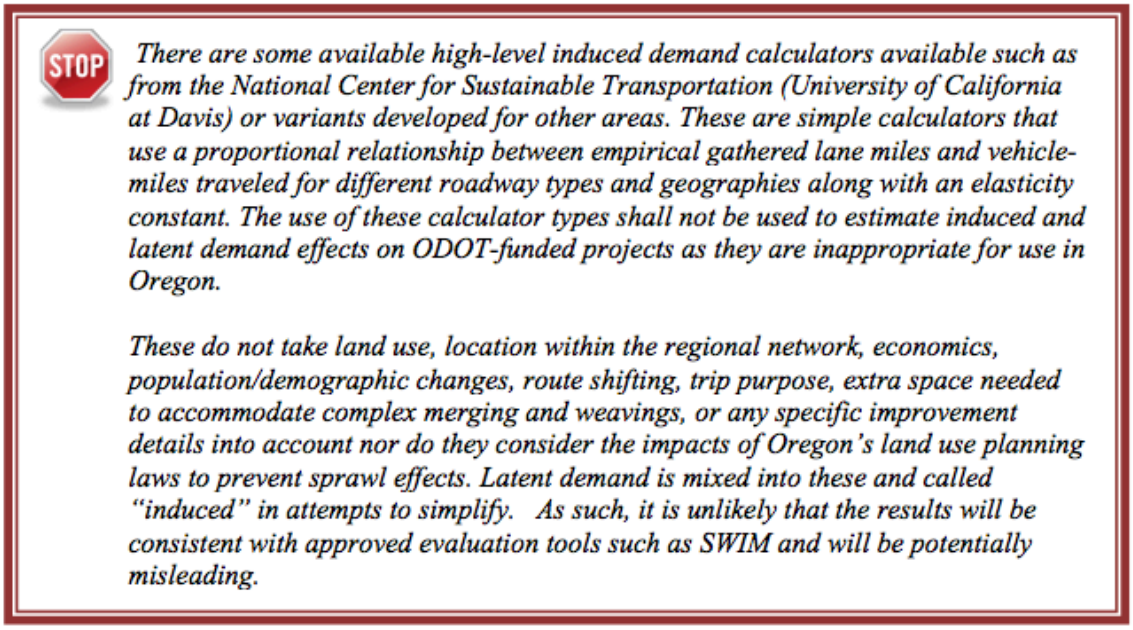

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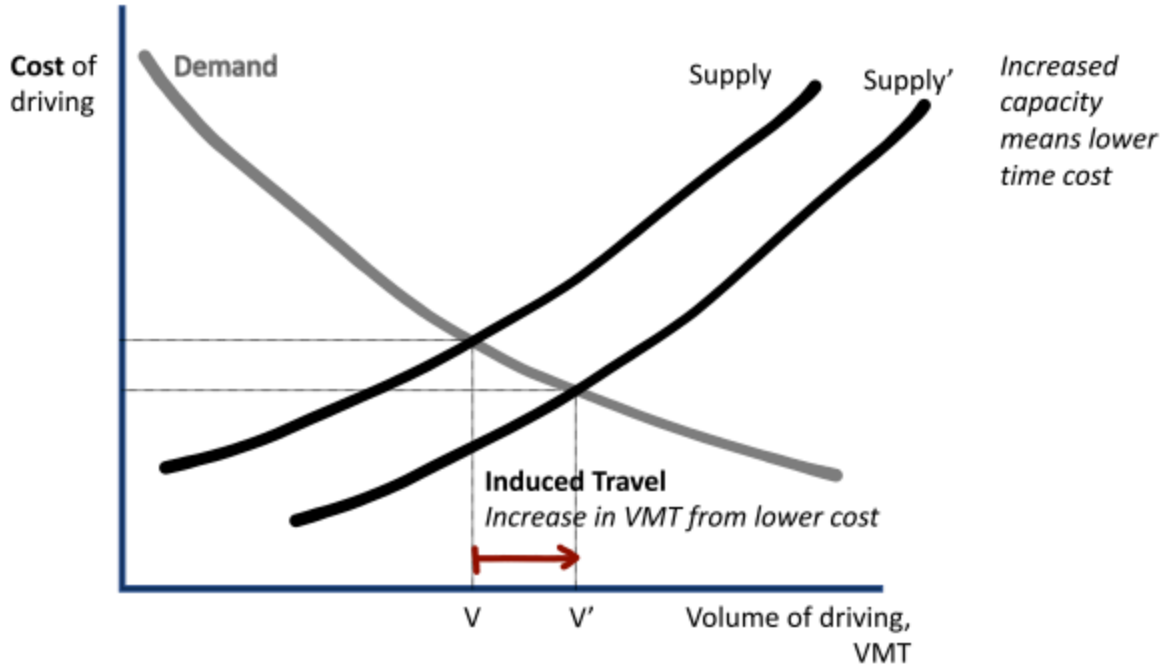

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Authors	Geography	*Elasticities*	
		Short Run	Longer Run
Fulton et al. (2000)	United States (Maryland, North Carolina, Virginia, Washington, DC)	0.46–0.51	-
Noland & Cowart (2000)	United States	0.28–0.76	-
Cervero & Hansen (2002)	United States (California)	0.59	0.79 (5 year)
Duranton & Turner (2011)	United States	-	1.03 (10 year)
Su (2011)	United States	0.07	0.26
Melo et al. (2012)	United States	-	0.98
Graham et al. (2014)	United States	-	0.77
Hymel (2019)	United States	0.32–0.37	0.89–1.06
González & Marrero (2012)	Spain	0.11–0.17	0.27–0.31
Hsu & Zhang (2014)	Japan	-	1.24–1.30 (3-5 year)
		-	1.24–1.34 (3-5 year)
Chen & Klaiber (2020)	China	0.99	-
García-López et al. (2020)	Europe (29 countries)	-	1.21 (5 year)

The authoritative *Traffic Engineering Handbook* summarizes the literature on induced demand as follows:

> . . . the long-run elasticities of VMT with respect to road space is generally 0.5 to 1.0 after controlling for popula
> with values of almost 1.0, suggesting that new road space is totally filled by generated traffic where congestion i
>
> Kara Kockelman (2011), "Traffic Congestion," Chapter 22, *Transportation Engineering Handbook*, McGraw Hill .

ODOT asserts that it can ignore all this literature. ODOT argues, in essence, that even thought the consensus is f
Oregon, contra all this published literature, it believes the real coefficient of these equations is zero: that a one
capacity would lead to no increase whatsoever in travel demand. In essence, the ODOT Analysis Methods Manual t
demand entirely.

Latent demand is induced demand.

The apparent justification for this conclusion is that there's something called "latent" demand that's different from "indu

Oregon DOT falsely claims that there is a difference between "latent" demand and "induced" demand. Here's what the

> Latent Demand – this is demand for transportation that consumers do not utilize because they cannot afford the available. Latent demand responses are typically associated with network limitations, such as capacity constra **does not include induced demand.**
>
> Induced demand – new demand for travel that did not exist prior to the build scenario. This is above and beyo demand associated with planned land use, **it is demand that is the result of changes in land use** (zone conditions that create new trips.
>
> (ODOT Analysis Procedures Manual, June 2022, emphasis added).

Denying that "latent" demand is induced demand is not supported in the literature. No other study uses these terms distinction between "induced" and "latent" demand. This is ODOT's Through the Looking Glass moment:

> "When I use a word," Humpty Dumpty said, in rather a scornful tone, "it means just what I choose it to mean- ne

Ben and Jerry observe the latent demand for ice cream every year when they drop the price of a cone to zero, and pe These are all people who would love to have ice cream, if only it were free. The lines around the block are "induced price of ice cream converts "latent demand" into "actual demand."

But we know empirically that travel changes rapidly in response to available highway capacity. That's true both i contractions in capacity. People rapidly and radically change their travel distances and trip making in response to c "carmaggedons" in the face of reductions of capacity from bridge closures, highway collapses, construction projects other similar events cause traffic disappearance.

Ultimately, this is pure sophistry: Whether you call it "latent" demand or "induced" demand, the effects are exactly the to existing roadways increases the volume of vehicle travel.

Oregon's Analysis Procedures Manual vs. California's Transportation Analysis Framework

While OregonDOT has just published its "Analysis Procedures Manual" banning the use of induced travel calculat Caltrans has published guidelines that require the use of such a calculator to highway projects in the Golden State. require the calculator, while the other bans it. Who is right?

Transportation Analysis Framework
First Edition*

Evaluating Transportation Impacts of
State Highway System Projects

Let's consider the processes and documentation that went into the CalTrans and ODOT publications. CalTrans a years-long study and review effort. It brought in outside experts, it conducted and published a thorough literature re was the subject of public meetings. As the Framework document explains:

> Caltrans convened an expert panel of academics and practitioners through UC Berkeley Tech Transfer. The p group's conclusions to stakeholders at a virtual Technical Roundtable prior to finalizing the group's recomm State partners have accepted the panel's recommendations, which are reflected in the guidance documents.

In contrast, the Oregon Manual has no identified author, cites no academic literature, has not been subject t independent from the Oregon Department of Transportation. It is an unsubstantiated, unscientific polemic.

It's also possible (and indeed likely) that even without changes in land use, households and businesses will sort the existing stock of land and buildings. If travel is fast and free, people may choose to live at housing a great distance commute to jobs at great distance from their homes). If travel is slower or more expensive, they may seek housing n

only closer to home in order to minimize the time and money costs of travel. The redistribution of population and buildings in response to changes in travel costs is something that ODOT denies is even possible.

What's deeply ironic about the denial of induced demand is that highway departments have been counting on it to c their services for decades. Building more and wider roads has led to more driving and more car ownership, which capacity, and led to calls for further widening. It's a Sisyphean cycle that leads to ever more traffic and ever more sp what highway departments and their vendors want.

Induced Demand and Land Use Changes

As Litman points out there are first-, second-, third- and fourth-order effects from highway capacity increases. Initia order). That prompts people to change whether, when, where and by what means they travel.(second order). T accessibility may then prompt changes in land use (third order). Finally, the cumulative effect of a shift to sprawl and further amplify trip taking (fourth-order).

> Roadway expansion impacts tend to include:
>
> First order. Reduced congestion delay, increased traffic speeds.
>
> Second order. Changes in time, route, destination and mode.
>
> Third order. Land use changes. More dispersed, automobile-oriented development.
>
> Fourth order. Overall increase in automobile dependency. Degraded walking and cycling conditions (due to wi traffic volumes), reduced public transit service (due to reduced demand and associated scale economies, some Thomson paradox), and social stigma associated with alternative modes.

The ODOT view is that the "second order" effects—changing times, routes, additional trip taking, and more miles trave "induced travel" if no changes in land use happen. Or, alternatively, if that travel is accurately predicted by a traffic (i.e. "above and beyond forecasted") , that it also doesn't count.

The Land Use Red Herring

But let's have a look at the second part of the argument: That the transportation agency can ignore that part of indu land use changes in response to the expansion of roadways, and that somehow, because Oregon has a system o

effects simply don't occur here. ODOT's rhetorical position is that "Induced demand" can only occur in response to la
changes are impossible under Oregon's land use system.

- **Induced demand** – new demand for travel that did not exist prior to the build scenario. This is above and beyond forecasted and latent demand associated with planned land use, it is demand that is the result of changes in land use (zone changes) or economic conditions that create new trips. Induced demand can be identified on a regional scale when there is an increase in demand that cannot be attributed to other types of demand, such as demand diverting from one facility to another. Induced demand typically occurs over a long time span and may relate to land use changes outside of the study area or a reduction in the cost of accessing destinations previously too costly to access.

The Oregon Department of Transportation likes to pretend that the only form of induced travel that is real is that which
use. And they argue that because Oregon has strict land use laws, that investments in travel infrastructure can't produ

> In general, Oregon faces low risk related to induced demand because of the state's strong land use laws, which
> Changes to land use must be approved by local jurisdictions, so **a facility project cannot induce demand just**

ODOT's reasoning is this: Induced demand only occurs when there is a land use change that necessitates a change
Oregon has land use plans, transportation projects somehow can't create induced demand. This reasoning is wro
we've already explained, "latent" demand–changes in transportation behavior in response to a capacity increase–
change in land use, and this "latent" demand is, according to all the scientific literature "induced demand." The secon
use law doesn't prevent or preclude changes in land use in response to changes in transportation infrastructure.

What this misses is that the land use system is a permissive framework, and within that legal framework many possi
employment are possible. For example, new housing can be built in infill locations (near transit, and proximate to mo
urban periphery. Both outcomes are possible under the Oregon land use system. The key point about induced dem
transportation infrastructure will make lower density, more far flung development even more attractive. And, impor
demand for Oregon roadways comes from places not subject to the Oregon land use system (i.e. suburban Clark Cou
more transportation capacity across the Columbia River will facilitate more low density sprawl in Washington, and ad
and I-205 bridges as large fractions of these suburban and exurban households live and shop in Oregon.

A lobbying campaign to deny induced demand

There's little question that ODOT officials are uncomfortable with the science of induced travel. And they're eag minimize or misrepresent or discredit the application of this scientific fact to transportation planning. For example, i through AASHTO (the lobbying organization of state highway agencies) to get a project funded to dispute induced de that its proposal made it clear that the agency was primarily interested in generating talking points to push back demand to metro area freeway expansion projects.

> "While the road building era of the 1950s freeway networks is essentially complete, even minor strategies and optimize existing roadway system assets are increasingly facing opposition in the name of "induced demand"…"

Even as it is busily ignoring or denying the science of induced travel, the Oregon Department of Transportation re myth that idling in traffic is a significant source of greenhouse gas emissions that can be reduced by widening roadway

The contents of this report reflect the views of the Oregon Department of Transportation, Transportation Planning Analysis Unit, which is responsible for the facts and accuracy of the information presented herein. The contents do not necessarily reflect the official views or policies of the Federal Highway Administration.

Points that are critical for the analysis process are displayed as a box in italics with the stop sign icon.

Traffic Projections that Deny Induced Travel Lack Scientific Integrity

To the extent that ODOT's guidance limits what is included in a federally required environmental impact statement, it sources for its claims, and its consistent ignorance of published scientific literature on induced travel constitutes a vio requirements of NEPA.

> § 1502.23 Methodology and scientific accuracy.
>
> Agencies shall ensure the professional integrity, including scientific integrity, of the discussions and ana documents. Agencies shall make use of reliable existing data and resources. Agencies may make use of ar

such as remotely gathered information or statistical models. **They shall identify any methodologies used a reference to the scientific and other sources relied upon for conclusions in the statement**. Agencies methodology in an appendix. Agencies are not required to undertake new scientific and technical research Nothing in this section is intended to prohibit agencies from compliance with the requirements of other statute and technical research.

Chuck Marohn, writing at Strong Towns explains that traffic engineers treat travel demand as a fixed and immutable and a world view that pretends that people will travel just as much whether they build a project or not. This view h roads, but doesn't reflect reality and ought to be treated as professional malpractice:

> The concept of "travel demand" is where traffic engineers have stunted their own intellectual development more else. And they've done so for two reasons. First, it makes their models easier to run. It's really difficult (imp models that factor in the behavioral responses of humans. Better to just assume a static level of demand, even is a farce (remember, **traffic models are all about justifying projects**, not actually modeling what is going on i
>
> Second, it allows traffic planners and engineers to position themselves and their craft as responding to deman an important distinction because it allows them to be confident in what they do without having to struggle with that things aren't working. . . .
>
> Engineering in the auto age is about building—build, build, build—and not about optimizing or managing syste merely to build more stuff, you develop myths and models that support that ethos. That's what you're seein assertion that additional capacity does not generate more trips. . . .
>
> In 2022, denying how highway expansions induce people to drive more should be considered professional malp

US Secretary of Transportation Pete Buttigieg clearly endorses the science of induced demand. In a recent television Wallace:

> . . . here's an entire science to this. And we have a lot of research partners. We have our own research ins Institute, which is in Cambridge, Massachusetts. . . . one of the challenges we have right now is you got more country more and more people on the road. Just how to be smart about that. For example,it turns out that s want to get a lot of traffic on the roadway, and you just added lanes to it, all you get is more traffic, because people want to drive on that road and then you're right back where you were.

IBR Draft SEIS - RECORD #2619 DETAIL

First Name :	LIndsay
Last Name :	Johnston
Attachments :	DSEIS-2619_Johnston_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #2619 DETAIL

Submission Date :	11/18/2024
First Name :	LIndsay
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Business/Organization/Agency :	Weber Coastal Bells

Submission Input :

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LIndsay

Last Name:
Johnston

Business or Organization:
Weber Coastal Bells

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Hayden Island Issues

Comment:
As a condo owner and business owner on the island, the amount of money and distruption to the island with little to no traffic relief this bridge it not the solution.
1. The $7-12 billion cost is outrageous, while doing little to solve I-5 traffic congestion at the I-5 bridge.
2. The massive bridge will inevitably experience massive cost overruns, causing a redirection of funding meant for social programs.

3. Bridge tolls will impose a heavy and daily financial burden on all adjacent communities.
4. IBR's fixed-spans offer only 116 feet of vertical clearance above water, a full 62 ft less than today's drawbridge which will significantly restrict larger commercial vessels from using the Columbia River to support upstream communities.
5. The 175 ft bridge height will be an eyesore that will detract from the current scenic beauty of the crossing.
6. Per the committee, IBR bridge plans will not be engineered to withstand a major Cascade Seduction Zone earthquake! Scientists are currently predicting there is about a 37% chance that a mega-thrust earthquake in this fault zone will occur in the next 50 years.
7. The IBR is an area where ground liquefaction is "expected" during a major earthquake. Liquefaction is a major threat to any bridge.
8. The Delta Park 30ft high 1/4 mile corkscrew bike & pedestrian access ramp, is too long & steep for the general public.
9. At 100ft above ground, the Vancouver transit station will be a long reach as elevator outages do happen.
10. At 30ft above ground, the Hayden Island transit station will also be a long reach subject to periodic elevator outages.
11. The 18-lane interchange planned for Hayden Island will create a very wide ugly swath of multiple pavement lanes across prime retail property, and a navigational nightmare for the visiting public and islanders.
12. The bridge's 15-year construction period will create a huge loss of quality of life, income, & property values for Hayden Island and adjacent communities.

JCA comment #: 662

IBR Draft SEIS - RECORD #2620 DETAIL

First Name :	Spencer
Last Name :	Kroll
Attachments :	DSEIS-2620_Kroll_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #2620 DETAIL

Submission Date : 11/18/2024
First Name : Spencer
Last Name : Kroll
Business/Organization/Agency :

Submission Input :

First Name:
Spencer

Last Name:
Kroll

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Climate Change

Comment:
Hello,
We absolutely do not need to add more lanes to the I-5 corridor in the face of accelerating climate change.

What we need is a new, taller bridge that does not stop traffic between Canada and Mexico and also incorporates ample opportunities for pedestrians, cyclist and also light rail expansion to Vancouver and beyond. It's time to get this done the right way without pressure from ODOT's car obsessed leadership.

Thank you,

Spencer Kroll

JCA comment #: 661

IBR Draft SEIS - RECORD #2621 DETAIL

First Name :	Phillip
Last Name :	Ross
Attachments :	DSEIS-2621_Ross_Original.pdf (9 kb)

IBR Draft SEIS - RECORD #2621 DETAIL

Submission Date : 11/18/2024
First Name : Phillip
Last Name : Ross
Business/Organization/Agency :

Submission Input :

First Name:
Phillip

Last Name:
Ross

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
Recommendations for Improving Transit Connection Facilities in the IBR Project

Dear IBR Project Team,

I am writing to express my concerns regarding the proposed design for the Interstate Bridge Replacement (IBR) project, specifically as it relates to the transit and active transportation facilities. While the $7.5 billion investment represents a critical opportunity to modernize the I-5 corridor between Portland and Vancouver, certain design elements will limit the project's usability, accessibility, and environmental impact if left unaddressed.

Concerns and Recommendations

1. Transit Station Accessibility:

The proposed elevated transit stations in Vancouver, at heights of approximately 100 feet (10 stories), will create significant accessibility challenges for users. This design will deter riders and reduce the overall effectiveness of the public transit component of the project. Station designs must prioritize ease of access, particularly for individuals with mobility limitations, to ensure widespread use and long-term success.

2. Bike Path Placement and Connectivity:

Placing the bike path on the east side of the bridge, away from the transit line, creates a disconnect between active transportation and public transit. This separation, compounded by the lack of direct connections or elevators linking the Vancouver waterfront to the bike path, forces cyclists into an unnecessary one-mile detour that includes a half-mile spiral ramp. Such a design will discourage use and undermine the goal of fostering seamless multimodal transportation.

3. Integrated Multimodal Design:

To maximize the project's impact, bike paths must be co-located alongside transit lines. This adjustment will allow for direct transfers between active transportation and public transit modes, increasing convenience and encouraging adoption. Additionally, keeping the bike path elevated will eliminate unnecessary detours and improve accessibility for cyclists and pedestrians alike.

Why These Changes Matter

By aligning bike and transit facilities and prioritizing user-friendly designs, the IBR project will better meet the needs of the community while advancing regional goals of sustainability, reduced congestion, and equitable access to transportation. Investing in integrated and accessible infrastructure now will ensure higher usage rates and demonstrate a commitment to forward-thinking urban planning.

The IBR project represents an unparalleled opportunity to enhance transportation infrastructure in the region. To fully realize this potential, I urge you to adopt the above recommendations in the project's final design. Thank you for your commitment to delivering a project that truly serves all members of our community.

Sincerely,

Phillip M Ross

JCA comment #: 660

IBR Draft SEIS - RECORD #2622 DETAIL

First Name :	Joseph
Last Name :	Cortright
Attachments :	DSEIS-2622_Cortright_Original.pdf (1 mb)

Submitted to the Joint Oregon Washington I-5 Committee
October 28, 2022

Joseph Cortright

Available on-line at:
https://cityobservatory.org/risky-bridges-deja-vu-all-over-again/

Needed: An independent review of technical mistakes that could cost billions

The proposed multi-billion dollar Interstate Bridge Replacement is shaping up a repeat of the Columbia River Crossing (CRC) fiasco because the two states haven't done anything to independently verify the work of their staff.

Oregon DOT and WSDOT are repeating all the key mistakes that caused the Columbia River Crossing (CRC) to fail a decade ago:

- Designing an oversized project
- Kicking the can down the road on hard financial decisions
- Ignoring engineering and regulatory warning signs
- Not developing a plan to break the project into affordable phases
- Rebuilding too many closely spaced interchanges.
- Not getting Coast Guard approval of bridge height until after spending tens of millions designing a bridge

Critically, the Interstate Bridge Replacement project is **not** being independently reviewed to determine whether its engineering design, traffic plans, travel projections, revenue forecasts and budget are reasonable. In the case of the CRC, a series of outside experts were called in, and spotted problems that were created or ignored by state DOT staff. Project officials for the IBR project are making the same errors, but haven't been subjected to any real scrutiny from disinterested, outside experts.

In the case of the Columbia River Crossing, **four different times**, outside experts were called in to independently examine the work of the Oregon and Washington transportation departments:

- 2010: Independent Review Panel
- 2011: Bridge Review Panel
- 2010: Bain Traffic & Revenue Forecast Review
- 2013: CDM Smith Investment Grade Analysis

Every time, they found costly errors that could have potentially doomed the project that needed to be fixed. The two states spent millions of dollars on these independent reviews ($1.2 million

for the two independent review panels, and another $1.5 million for independent traffic and toll revenue projections). These expenditures were money well-spent because they avoided even costlier mistakes. (We detail each of these reports below).

Say you're looking at buying a used car. While the owner assures you it's it good shape, you'd definitely want to check things out. You'd be well-advised to spend a few bucks and get an independent mechanic to look it over, and you'd probably spend a few bucks getting a "CarFax" report to see the vehicles history. Same thing about buying a house: you'd want to have a thorough inspection by an impartial expert.

Oregon and Washington leaders would be well-served by taking similarly prudent steps to check out the validity of the work being done for the Interstate Bridge Replacement project. The history of the project clearly shows why: The failed Columbia River Crossing collapsed in significant part because of errors and sloppy work done by the two state departments of transportation. A decade ago, reviews by independent experts hired by the two states show that the traffic and financial projects were flawed, the schedule was unreliable, the chosen bridge design was "unbuildable;" plus the initial design for the bridge was too low to qualify for Coast Guard approval. Independent experts also found that the project was making overly optimistic financial assumptions, failed to create a reasonable contingency plan (including phasing the project), and was perpetuating traffic problems (and driving up costs) by not removing one or more interchanges.

Before Oregon and Washington move forward with the latest version of the CRC, now called the "Interstate Bridge Replacement," (IBR) this project, which current estimates say could cost as much as $5 billion (and which past history has shown to be a significant understatement), they would be wise to hire some independent experts to check out the quality of the work done. So far, decision-makers are being asked to simply trust the two agencies, something that led to the epic failure of the Columbia River Crossing a decade ago. As we pointed out, ODOT pre-construction cost estimates for major highway projects have routinely been way too low, with the typical project ending up costing more than twice as much as its initial estimate.

The proposed IBR would be more expensive, more complex, and more financially risky than any other project ODOT has ever undertaken. The likelihood of errors is high, and the necessity for quality control checks on ODOT and WSDOT is critical. And recall, these are agencies that have repeatedly made false claims about key project issues, for example, falsely saying that if the two state's didn't move forward with the project they'd have to repay the federal government the $140 million spent planning the failed Columbia River Crossing.

1. Independent Review Panel findings: "unbuildable," "not accurate", "problematic", "seriously suspect"

In 2010, Governors John Kitzhaber and Christine Gregoire appointed an Independent Review Panel (IRP) to audit every aspect of the Columbia River Crossing project. The panel spent months studying the project, meeting with project staff, carefully studied the "open web" bridge structure the two DOTs designed, and in their report declared it "unbuildable" and directed that a

new design be selected. The Panel of experts from around the country looked at every aspect of the project's design, management, and financing had issued a 317-page report

INDEPENDENT REVIEW PANEL
Columbia River Crossing

PO Box 11351
Olympia, WA 98508

July 27, 2010

Governor Christine O. Gregoire
Office of the Governor
PO Box 40002
Olympia, WA 98504-0002

Governor Theodore R. Kulongoski
160 State Capitol
900 Court Street
Salem, Oregon 97301-4047

Columbia River Crossing Independent Review Panel Final Report

The Independent Review Panel warned that the project finances were tenuous and uncertain, just as they are with today's IBR. The panel of national experts warned:

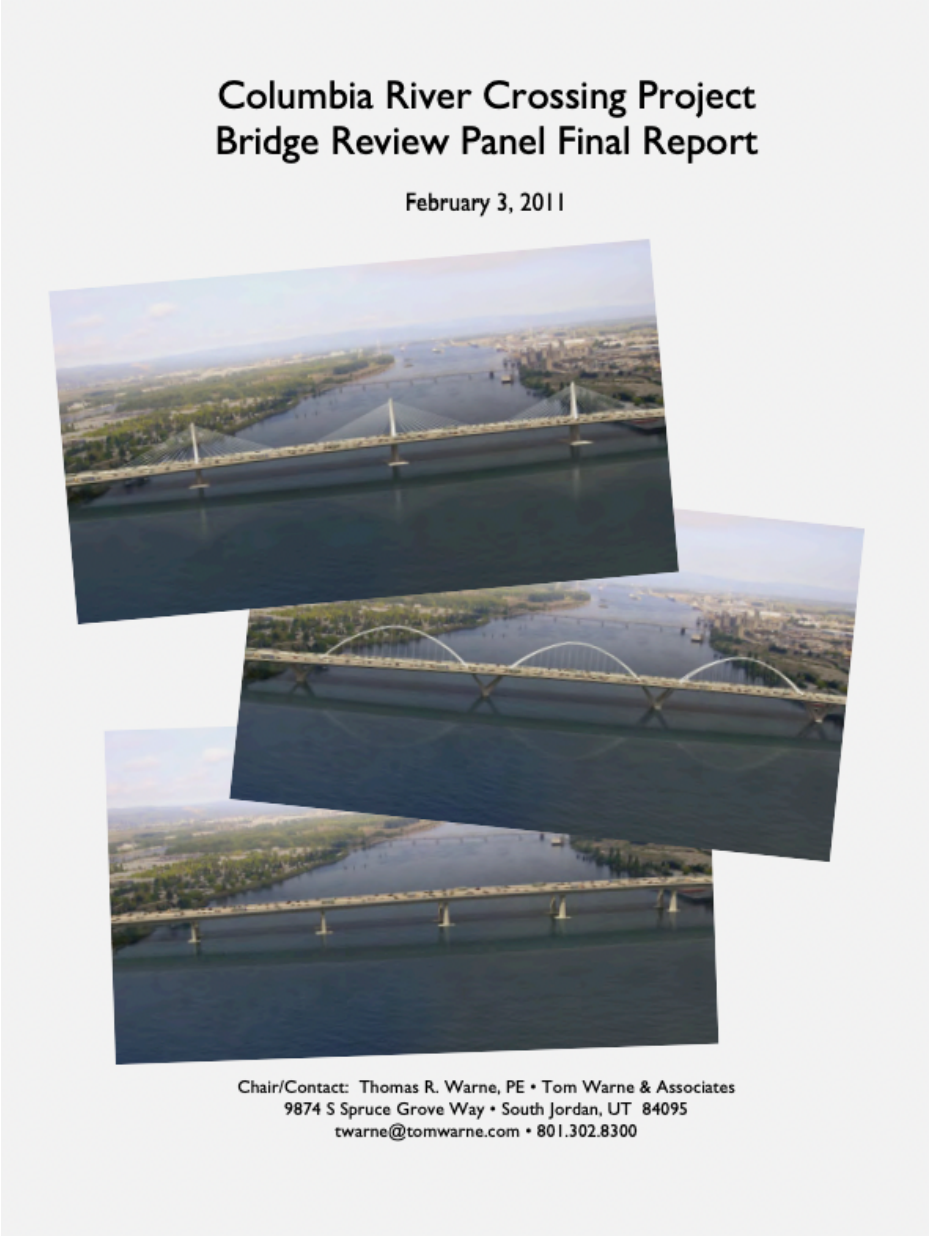
"As currently envisioned development of the CRC is counting on full funding from multiple sources, including tolling which will be new to the community and unproven in its revenue generating potential. Failure to achieve one or more major sources of funding can make the entire project unmanageable or unaffordable in the present."

The IRP had harsh criticism of the sketchy and inconsistent project budget and schedule. Their report flagged numerous problems, saying the budget and schedule had:

- "significant risk"
- "not accurate enough"
- "the reliability of the final outputs for cost and schedule are seriously suspect"
- "the credibility of the cost basis is . . . problematic"

2. Bridge Review Panel: A totally new bridge design

One direct outcome of the 2010 IRP was a determination that the proposed "open-web" design for the river crossing was "unbuildable." That led the two governors to appoint another panel, the bridge review panel, to come up with an alternative design. That panel, also chaired by Tom Warne, issued its 146-page report in



2011.

The Bridge Review Panel described themselves and their work as follows:

> This 16 member panel was comprised of national and international bridge experts, plus key representatives from federal, state and local partner transportation agencies. The mission of the BRP was to examine the current design and potential bridge types given current project constraints and including scenarios where constraints are relaxed or

modified. Issues such as meeting current environmental project commitments, sound technical and engineering approaches, aesthetic statements and cost effectiveness were also key considerations.

The panel's report concluded that any of three different bridge designs could work, including both a cable-stayed and tied-arch designs, which would be considerably taller than the design selected for the IBR. They determined that these taller designs had no insurmountable conflicts with aviation at Pearson field.

In all, Oregon and Washington spent nearly $1.2 million on consultant services specifically for the two panels. This doesn't include the costs of staff time for the two state transportation departments, or the time of other consultants already hired for other tasks, who provided information to the panels.

Independent Review Panel and Bridge Review Panel Expenses

Consultant	Amount	Description (per CRC)
John Clark	210,003.56	Participated on Bridge Expert Review Panel
Tom Warne	184,745.20	Led Independent Review Panel & Bridge Review Panel
Public Knowledge	141,921.40	Governors Expert Review Panel Administrator
Pegasus Global Holdings	99,439.44	Participated on CRC Independent Review Panel
Cascadia Law Group	85,825.52	Participated on CRC Independent Review Panel
Lenhardt, Andra & Partner	82,643.64	Participated on Bridge Review Panel
ERF	79,711.36	Participated on CRC Independent Review Panel
Aecom Technical Services	68,547.57	Participated on CRC Independent Review Panel
TY Lin International	58,367.04	Participated on Bridge Review Panel; CEVP
URS	47,191.48	Participated on Bridge Review Panel
Ralls Newman	45,522.99	Participated on Bridge Review Panel
Stephan Thoman Consulting	41,121.30	Participated on Bridge Review Panel
Mary Lou Ralls	26,012.50	Participated on CRC Independent Review Panel
Michael Meyer	16,983.50	Governors Expert Review Panel Member
Total	1,188,036.50	

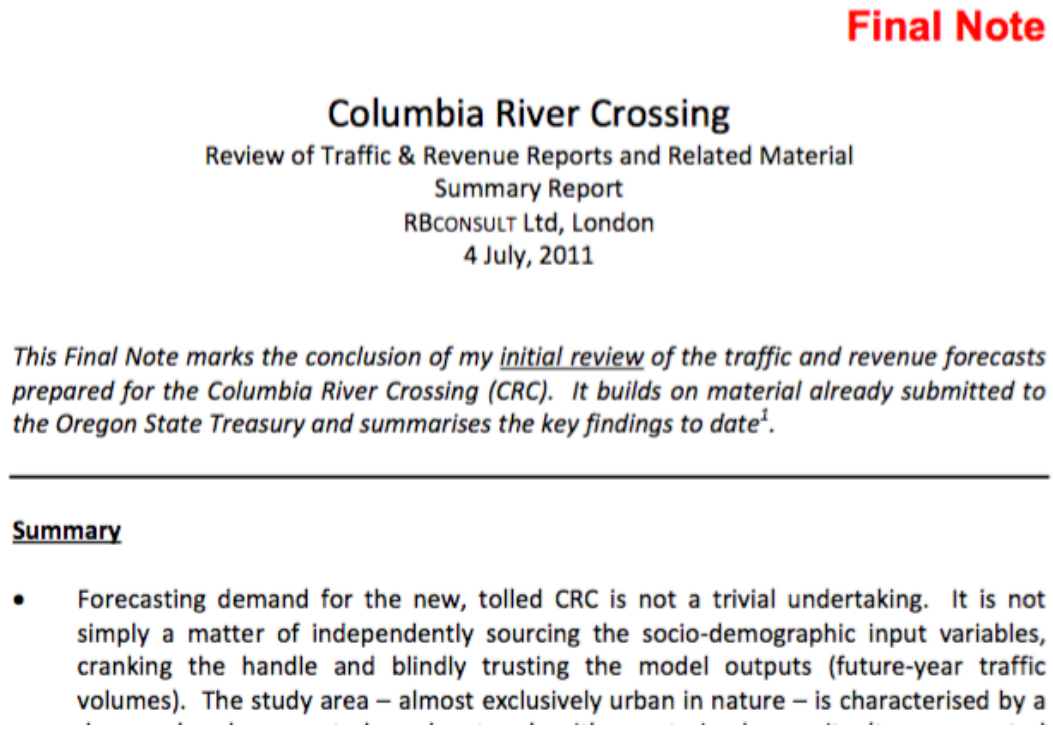
Source: Columbia River Crossing
https://projects.oregonlive.com/crc/spending/

3. The Bain Report: Flawed traffic projections

Accurate traffic projections are crucial for designing the correct size for the bridge and approaches, and for correctly estimating potential revenue from tolling. The Oregon and

Washington transportation departments have poor track records in traffic projections. Washington's state treasurer raised alarms about CRC toll financing after revenues for the newly built Tacoma Narrows toll bridge came in well under WSDOT projections. In 2010, concerns about the inadequacy of ODOT and WSDOT's CRC travel projections led Oregon State Treasurer Ted Wheeler to hire international toll finance expert Robert Bain to review their work. Bain's review found:

- Traffic and revenue analyses prepare for the CRC were "not suitable" for credit analysis
- CRC traffic projections were "confusing" and "outdated"
- Authors of the traffic projections failed to examine historical data or verify their models against actual trends
- Diversion estimates to I-205 were "worrying."
- Overall, the CRC appears to have overestimated traffic.



Final Note

Columbia River Crossing

Review of Traffic & Revenue Reports and Related Material

Summary Report

RBCONSULT Ltd, London

4 July, 2011

This Final Note marks the conclusion of my initial review of the traffic and revenue forecasts prepared for the Columbia River Crossing (CRC). It builds on material already submitted to the Oregon State Treasury and summarises the key findings to date[1].

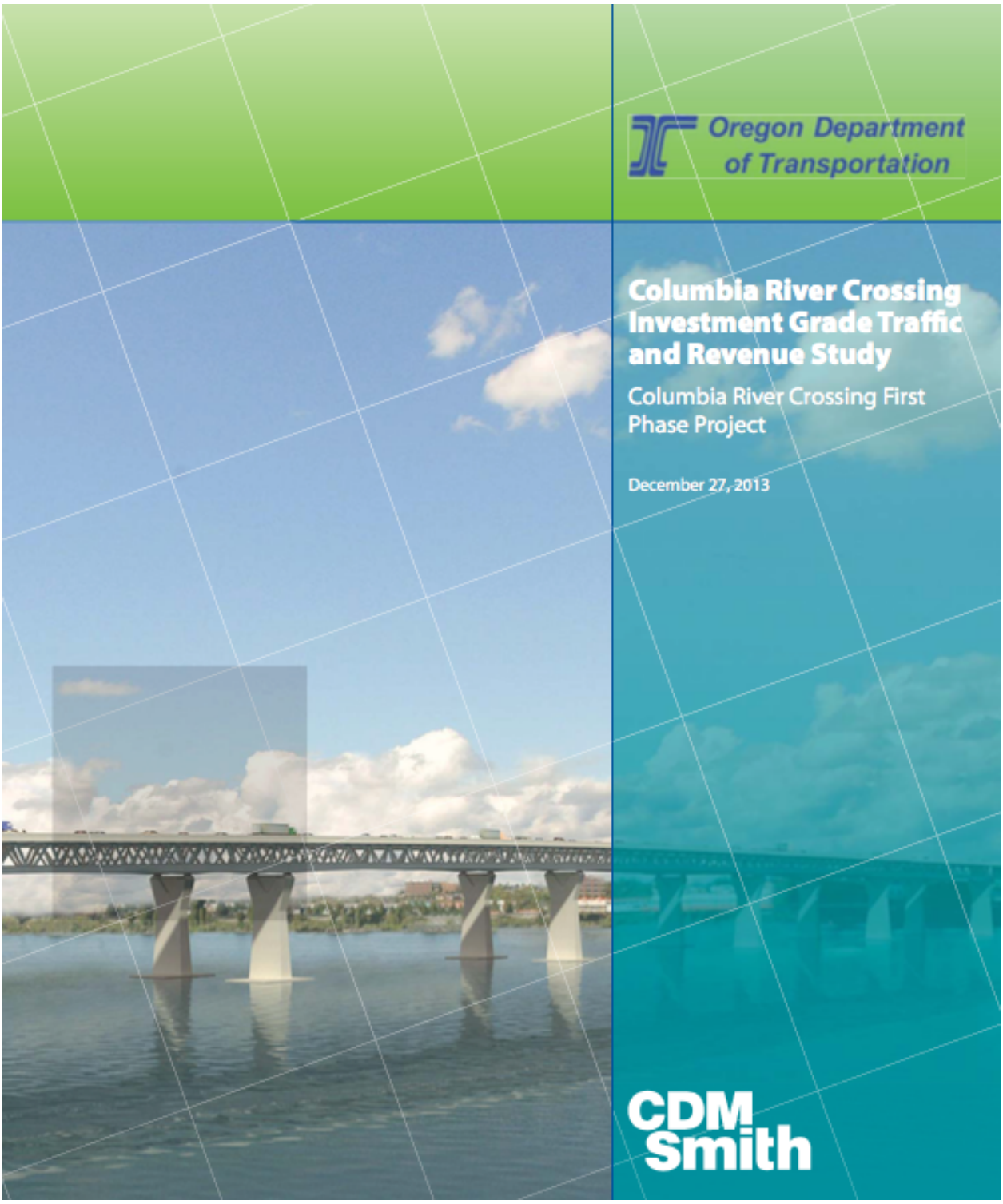
Summary

- Forecasting demand for the new, tolled CRC is not a trivial undertaking. It is not simply a matter of independently sourcing the socio-demographic input variables, cranking the handle and blindly trusting the model outputs (future-year traffic volumes). The study area – almost exclusively urban in nature – is characterised by a

4. The CDM Smith Investment Grade Analysis: FEIS Toll Traffic & Revenue Analysis Wrong

In 2013, two years after the issuance of the Final Environmental Impact Statement and the Record of Decision, the Columbia River Crossing finally got the results of the Investment Grade Analysis (IGA) prepared by its consultants, CDM Smith. The Oregon and Washington Departments of Transportation paid CDM Smith more than $1.5 million to develop their traffic modeling for the Investment Grade Analysis. The results were dramatically different than portrayed in the FEIS, and confirmed the flaws that the Bain report identified in the earlier modeling. The CDM Smith report said tolls would have to be at least twice as high (a minimum

of $2.60, rather than $1.35) and that the level of traffic that could be expected on the new widened I-5 bridge would be perpetually lower than that volume carried on the old I-5 bridge, because tolls would reduce and divert traffic. In short, the investment grade analysis confirmed what critics had been saying all along: that a tolled bridge would need no more capacity than the existing structure.



That history should be powerful proof to current decision-makers that they should insist on seeing an investment grade analysis before deciding on the size of the "replacement" bridge. But project manager Greg Johnson obstinately told the Metro Council in January 2022 that the investment grade analysis would not be used to size the bridge.

> . . . the question regarding the investment grade traffic study. That's one that we're going to have our folks look deeply into as far as the timing, but I do want to want to correct a misnomer. That investment grade traffic study is not to size the bridge. What sizes the bridge is the data that we take from the regional models that are a part of Metro and RTC . . .

Reflect for a moment what that means: Johnson is saying he'll disregard objective expert third-party information about how much money (and traffic) a tolled bridge will generate in deciding how big the bridge should be. But economics and practical experience tells us a tolled bridge will have dramatically less traffic than the current structure. Louisville, Kentucky's tolled I-65 bridges, identical in many respects to the IBR, resulted in a 50 percent decline in traffic—and a huge revenue shortfall. The IGA prepared for the Columbia River Crossing by ODOT's own consultants, CDM Smith, said a tolled I-5 bridge would carry only about half as many vehicles when finished as did ODOT's less sophisticated (and frankly, biased) models.

Coast Guard Rejection of the low fixed spans

Even with two independent external reviews that considered engineering, and a much trumpeted "Cost Estimate Validation Process" designed to catch and prevent risks, the project failed to adequately address a key issue: navigation clearance. A crucial element of any river crossing on a navigable waterway is allowing sufficient room for shipping traffic, a determination that is made by law,by the US Coast Guard. The current I-5 bridges have a 178 foot river clearance under their lift span. Then, as now, the state transportation departments are Ignoring or downplaying the Coast Guard's sweeping authority to regulate bridge heights.

A decade ago, with the CRC, ODOT and WSDOT willfully ignored early advice from the Coast Guard that a 95-foot navigation clearance would be insufficient. As early as 2006, the Coast Guard signaled it would need 115 or 125 feet of navigation clearance; the CRC project decided on its own that 95 feet ought to be enough. The two state DOTs attempted to bludgeon their way to Coast Guard approval, but since the USCG has clear and independent statutory authority to regulate all structures over navigable waterways, it held firm and in 2011, reached its own determination that the CRC would have to clear at least 116 feet. That led to a year of delays and tens of millions in additional costs to re-engineer the bridge to have a higher clearance. Importantly, this was not a risk that was identified or provided for in the projects schedule or cost management system, showing a clear failure to manage risks on this large project.

The IBR seems hell-bent on repeating this blunder once again. A Coast Guard preliminary determination has found that a new bridge over the Columbia needs to have a navigation clearance of 178 feet. Despite the Coast Guard's ruling, the project is proceeding with its proposal for a 116 foot navigation clearance, and steadfastly refusing to look at alternatives, like

a moveable bridge span or a tunnel, that would enable a lower and far less expensive and disruptive crossing. WSDOT and ODOT would like to pretend that the preliminary determination doesn't really mean anything, but under the agreement between the US DOT and the Coast Guard, alternatives that don't meet the preliminary determination are supposed to be excluded from further NEPA review. When the two state DOTs disregard the 178-foot clearance determination, interagency agreement says they are "proceeding at their own risk."

Deja vu all over again

The same errors that doomed the CRC are being repeated now by the Oregon and Washington transportation departments. They've designed their bridge with a 116 foot clearance, assuming that this will meet approval by the Coast Guard. But their USCG-bridge permit expired years ago, and they will need to apply for a new one, and go through an entirely new permitting process, which will likely end up mandating an even taller bridge—one that the project hasn't considered.

Even the IBR's proposed 116' high bridge poses major and as yet unanswered questions. To reach that height, the bridge will require extremely steep approaches on the Oregon and Washington sides of the river. In Oregon, the roadway grade exceeds the design standard for Interstate freeways, and will require an exception. The steep bridge grades have led one local engineer to argue that the bridge will be particularly dangerous in icy weather. The project calls for rebuilding every one of the seven closely spaced interchanges that cause congestion, contrary to federal design standards and the recommendations of the bridge review panel. Unlike with the CRC, there hasn't been any independent review of this design.

The project has yet to produce a definitive financial plan. The project hasn't developed any contingency plans if one or more of the project revenue sources doesn't materialize. It hasn't prepare a plan for project phasing. In fact, the selected high bridge design may be difficult or impossible to phase, because the extreme height of the proposed new river crossing will make it impossible to access the new structure from existing approach ramps.

The project has no plans to undertake an independent, investment grade analysis of the project until 2025. Just as before, the project mades optimistic assumptions about toll revenues—its current traffic forecast uses minimum tolls of $1.35—only half of what the 2012 CDM Smith Study said would be necessary to provide a $1.3 billion tolling contribution to the project's finance plan.

Now, as before, the project is proposing to rebuild every single interchange in the project area, even though outside experts (and their own problem statement) show that's a substandard design approach that leads to traffic problems and needlessly increases the cost of the project.

In many ways, the re-named IBR project is a scene-for-scene remake of the disaster film that was the Columbia River Crossing. A key difference to date is that its controversial and questionable engineering, traffic forecasting and financial decisions simply haven't been vetted by outside experts, as was done with the CRC. The rush to move forward to a decision to select a "locally preferred alternative" without getting this kind of professional advice magnifies the risks that like

its predecessor, the IBR project will also collapse when one or more of these unexamined risks strikes.

Eyes wide shut

The proposed IBR project is a big and risky endeavor. What's lacking is any independent verification of the assertions made by the project staff. Last time around, with the Columbia River Crossing, state leaders took the prudent steps of asking a few basic questions before moving forward with the project. They hired independent engineers and experts to assess the project design, budget, schedule and phasing. They hired an international toll bond expert to study its traffic projections. They conducted an investment grade analysis. The federal government hired a "project management oversight consultant" to ride shotgun on the project. With the IBR, none of these safety steps have been taken.

Even the Legislature has been complicit in this failure to put in place basic safeguards and oversight. In 2017, as part of its major transportation funding legislation, the Legislature created a "Megaprojects Task Force" and directed it to study and report on the state's process for selecting and managing large projects.

> SECTION 121. (1) The Task Force on Mega Transportation Projects is established. For the purposes of this section, a “mega transportation project” includes transportation projects, as defined in ORS 367.010, that cost at least $360 million to complete, that attract a high level of public attention or political interest because of substantial direct and indirect impacts on the community or environment or that require a high level of attention to manage the project successfully. . . . (11) The task force shall submit a report in the manner provided by ORS 192.245, and may include recommendations for legislation, to the Joint Committee on Transportation established under section 26 of this 2017 Act no later than September 15, 2018.

The legislation set a September 2018 deadline for the Task Force to file its report, but the task force met only twice (after its deadline), never filed any report, and sunsetted, at the end of 2018. It turns out that even the Legislature, which is expected to make up the shortfalls and pay for the overages when ODOT makes a mistake, isn't willing to try and learn from past experience. In the case of the $5 billion (and probably much more) Interstate Bridge Project, that could be a very expensive outcome.

References

Bain Report, [pdf-embedder url="http://cityobservatory.org/wp-content/uploads/2022/06/Bain_CRC_Report_July4.pdf"]

Independent Review Panel Report [pdf-embedder url="http://cityobservatory.org/wp-content/uploads/2022/06/IRP_Report_July30.pdf"]

Bridge Review Panel Report
https://www.wsdot.wa.gov/accountability/ssb5806/docs/6_Project_Development/ExternalReviewValidation/Bridge_Review_Panel/BRP_Report.pdf

CDM Smith Report[pdf-embedder url="http://cityobservatory.org/wp-content/uploads/2022/06/CDM_SMith_2013.pdf"]

Coast Guard Bridge Permit

IBR Draft SEIS - RECORD #2623 DETAIL

First Name :	Katherine Anne
Last Name :	Stansbury
Attachments :	DSEIS-2633_Stansbury_Original.pdf (9 kb)

IBR Draft SEIS - RECORD #2623 DETAIL

Submission Date : 11/18/2024
First Name : Katherine Anne
Last Name : Stansbury
Business/Organization/Agency :

Submission Input :

First Name:
Katherine Anne

Last Name:
Stansbury

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
Public comment on the SEIS for the Interstate Bridge Replacement Program:
We should be focused on the following:
+ Active Transportation
• Side-by-side Integration: Transit and the multi-use path should be next to each other, for seamless transfers and ease of use. Path users should have convenient access to transit elevators, especially at elevated stations.

• Noise and Safety: Positioning transit lanes as buffers between the multi-use path and vehicle lanes can reduce noise, debris, and enhance user safety.
• Better Connections:
o Vancouver: The path should extend to Evergreen to prevent the need for using a 100-foot high spiral.
o Portland: Add connections to the popular Vancouver/Williams corridor in addition to the planned Kenton/Denver Ave. link.
+ Public Transit
• Future-Proofing for Capacity:
o Stations should be built to support four-car trains now to align with future downtown transit tunnel upgrades.
o Plan for even higher capacity transit systems, such as multi-lane Bus Rapid Transit (BRT) or heavy rail, beyond the 2045 Environmental Impact Statement (EIS) horizon. We must ensure today's infrastructure can adapt to tomorrow's needs.
o Induced Demand Consideration: Traffic modeling must realistically account for induced demand to ensure accurate projections for transit and road use.
+ Economic and Racial Justice
• Tolling Equity: Implement a low-income toll discount program from the first day of pre-completion tolling. This will help prevent financial burdens on vulnerable communities.
• Equity Priority: Freeway impacts—such as noise and tolls—disproportionately affect historically marginalized communities. Addressing this requires focused, equitable solutions.
+ Health Analysis
• Reliable Assessments: Current traffic modeling issues mean that health impact assessments (air quality, safety, etc.) are unreliable. A new, more realistic Supplemental Environmental Impact Statement (DSEIS) is needed.
• Health Concerns: Increased traffic under any scenario poses serious health risks and exacerbates negative outcomes for priority communities.
+ Project Scope and Justification
• Right-Sizing the Project:
o The DSEIS does not provide sufficient justification for a second auxiliary lane.
o Prioritizing a streamlined project focused on bridge replacement, transit enhancements, and active transportation—without extensive freeway expansion—would be more beneficial and cost-effective.

JCA comment #: 659

IBR Draft SEIS - RECORD #2624 DETAIL

First Name :	Ted
Last Name :	Timmons
Attachments :	DSEIS-2624_Timmons_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #2624 DETAIL

Submission Date : 11/18/2024
First Name : Ted
Last Name : Timmons
Business/Organization/Agency :

Submission Input :

First Name:
Ted

Last Name:
Timmons

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Topic Area:
Induced Demand

Comment:
The size and footprint of this new bridge and the interchange improvements are unacceptable. If a new bridge is needed, it doesn't need "auxiliary lanes" that are secretly additional lanes, and any traffic forecasts need to factor in induced demand and the effects of tolling to reduce peak congestion.

JCA comment #: 658

IBR Draft SEIS - RECORD #2625 DETAIL

First Name :	Joseph
Last Name :	Cortright
Attachments :	Cortright_IBR_Modeling_Analysis.pdf (3 mb)

Technical Analysis of the Interstate Bridge Project Traffic Modeling

Joe Cortright, City Observatory
November 2024

Executive Summary

1. Travel demand modeling underpins the rationale for the I-5 bridge, its financing, and accurately disclosing its environmental impacts. Flawed traffic models produce an invalid SDEIS.
2. Metro's Regional Travel Demand Model (RTDM) doesn't accurately predict I-5 Bridge Traffic. Metro's Kate model isn't calibrated to current traffic levels. Metro's model claims 164,000 vehicles cross the I-5 bridge daily; ODOT's traffic counts show fewer than 139,000. Metro's model over-states traffic 18 percent in current years.
3. Metro's past modeling efforts have consistently overstated **I-5 traffic growth**. The CRC EIS predicted traffic would grow 1.3% per year from 2005 through 2030; actual growth was 0.3% per year through 2019, and only 0.1 percent per year from 2005 through 2023.
4. The model overestimates **truck travel**. Metro's forecast claims 17,000 trucks per day cross the I-5 bridges; ODOT's traffic counters show fewer than 10,000 daily trucks; that's over 2 million phantom trucks annually the I-5 bridge. Metro's model says truck traffic on I-5 will increase 2 percent per year; in reality, its declined at more than 4 percent per year.
4. The Metro model ignores I-5 bridge capacity constraints that limit traffic growth. The I-5 bridges can carry no more than 4,800 vehicles in the afternoon peak hour northbound; Yet the Metro Kate model pretends than more than 6,000 vehicles cross the bridge in the PM peak now, and that number will increase. Metro is using a flawed "static assignment" model that ignores capacity constraints, in violation of federal guidance and best practice.
5. Metro's modeling uses an inflated value of time that underestimates driver response to tolls (and underestimates diversion).
6. IBR claims to rely on the Metro regional traffic model, but secretly modified the outputs of the Metro's model falsely calling alterations "post-processing." Metro's model is specific enough not to need post-processing, and IBR failed to follow state and professional standards for documenting "post-processing" alterations.
7. IBR failed to follow professional standards for traffic modeling:
    - Didn't assess accuracy of previous modeling
    - Failed to calibrate its model to match actual traffic
    - Failed to document "post processing" of model results
    - Ignored more accurate Level 2 and Level 3 models

8. IBR continues to rely on a nearly two-decade old "purpose and need" statement that overstates traffic growth by a factor of five, illegally excluding from consideration smarter, cheaper and more environmentally sound alternatives.
9. Flawed projections conceal IBR's negative environmental effects. A phony, dirty "No-Build" scenario.

10. IBR modeling violates the region's adopted climate plans. IBR plans for a25 percent increase in driving while Metro's Regional Transportation Plan calls for total driving to decline by 12 percent to meet climate requirements.

11. IBR modeling is inconsistent with Level 2 analysis; the Level 2 study shows with tolling traffic in 2045 will be fewer than 125,000 vehicles, far less than the 164,000 in the EIS
12. IBR modeling has not been transparent, important facts have been concealed from public view.
13. IBR modeling fails to incorporate post-Covid changes in travel behavior and land use patterns
14. IBR has incorrectly defined the "No Build" alternative by failing to include Regional Mobility Pricing, an adopted regional policy
15. IBR plans to reduce or eliminate tolls after construction bonds are paid and has failed to disclose the environmental effects associated with lower tolls.

Contents

Introduction

The errors in traffic modeling on the I-5 project constitute financial and environmental fraud. They misrepresent the environmental impacts of the project in a way that is calculated to understate its negative effects relative to not building the project (i.e. the No-Build Scenario).. By overstating traffic demand, IBR is fraudulently seeking more federal funds for a larger project than is needed to meet actual demand, and violating environmental laws that require accurately disclosing the project's economic, social and environmental effects.

The highway portion of the Interstate Bridge Replacement (IBR) project consists of two distinct parts, one of which stimulates and accommodates additional car travel (expanded lane capacity) and another which limits and discourages car travel (tolling). The combination of these two distinct elements will determine how many vehicles actually use the proposed IBR project when it is built.

The stimulative nature of added capacity, and the restrictive nature of tolling is confirmed by Metro's modeling. The Metro model forecasts that widening I-5 as recommended in the Locally Preferred Alternative (LPA) and not charging tolls will cause 215,398 vehicles per typical weekday to use the bridge in 2045. In contrast, that same Metro model forecasts that keeping the existing bridge (or for that matter a new I-5 bridge with just three through lanes in each direction) and imposing tolls would cause traffic to be just 153,625 vehicles per typical weekday. Regardless of the capacity of the bridge, tolling the bridge, according to the Metro model, causes 40,000 to 50,000 fewer vehicles to use the bridge on a typical weekday in 2045. In short, one cannot accurately forecast future travel on the I-5 bridge without specifying both the capacity of the roadway and the tolling regime.

Metro, IBR Modeling, February 2023, 2045 I-5 and I-205 Bridge Average Weekday Traffic

Scenario	I-5	I-205	Total
SDEIS NB	192,100	205,505	397,605
SDEIS NB tolled	153,625	227,362	380,988
Delta Tolls	-38,474	21,857	-16,617
	-20%	11%	-4%

SDEIS LPA	164,455	220,162	384,617
SDEIS LPA No Toll	215,398	192,732	408,129
Delta Tolls	50,943	-27,431	23,512
	31%	-12%	6%

Source: Metro, IBR_L2_SDEIS_I5_I205_xing_auto_truck_022723.xlsx

Consequently, tolling, and the exact level of tolls to be charged to users of the I-5 bridge is intrinsic to knowing future traffic levels, and consequently, to establishing how much capacity (the number of lanes) the bridge needs to have, and also determining what the environmental impact of the project will be.

Whether the I-5 bridge is tolled or not clearly matters to traffic levels, but so to it is the level of tolls which determines the exact level of traffic that can be expected to use the I-5 bridge. A low level of tolls will have a small effect on traffic levels a high level of tolls will tend to reduce and or divert traffic to other routes. As documented in Section 7 below, Metro's model shows the relationship between toll levels (expressed in terms of the equivalent time penalty for a dollar denominated toll amount). The Traffic Technical Report for the SDEIS is vague about the exact level of tolls that will be charged. The IBR has said it will defer actual toll setting to a later time. But not knowing the actual level of tolls to be charged means that one cannot know with any confidence the actual level of traffic that will be served by the proposed build alternative, and consequently, one cannot accurately assess the project's environmental impacts. In the case of the earlier version of the same project, the minimum level of tolls needed to be charged to finance the bridge had to be doubled from that assumed in the project's Final Environmental Impact Statement (minimum tolls were increased from $1.35 to $2.60 per crossing). This higher level of tolls, in turn, was expected to have a dramatic effect on traffic levels (reducing traffic on I-5 and shifting much of that traffic to I-205). While this reduction in traffic was calculated according to the CDM Smith "investment grade analysis" model, the computations from the Kate model illustrated above and in Section 7 below, confirm that a higher level of tolls will result in lower traffic on I-5 and more diversion of traffic to I-205.

In most Environmental Impact Statements, the "No-build" scenario can be objectively identified by reporting current data on actual conditions. In the case of major highway projects, the sponsoring agencies are defining the "No-Build" scenario not as actual observed conditions today, but rather hypothesized conditions 20 or more years from now. Because these future conditions cannot be independently or objectively verified, the burden

on the agency to establish the reasonableness of its hypotheses about how the world will change is extremely great. If great deference is granted to agencies to choose hypothetical scenarios about how the world might change, without anchoring such projections in a rigorous basis, the agency can simply construct an alternative future world which, by contrast, makes whatever action the agency proposes appear to be environmentally benign.

That is exactly what has happened with IBR's construction of its hypothetical future "no-build" scenario. The agency has selected parameters, especially for future traffic growth which create an unrealistically crowded, highway system. These predictions largely mirror projections the agency made for the earlier version of this same project a decade ago—projections which have been proven, in reality, not to be true (See section 8.7).

Inasmuch as the hypothetical predictions of future traffic levels are determinative of whether a project has adverse environmental and social impacts, there should be a high degree of transparency about the data, assumptions and modeling used to generate these hypotheticals. But in reality, traffic modeling done by Metro and the DOTs, and the process of modeling itself is a closely guarded set of secrets. Metro and ODOT consultants do not publish detailed data that shows how their final figures were arrived at (contrary to professional best practices), nor have they looked to see whether their previous efforts have produced accurate predictions. They have released limited data about their work only in response to public records requests. It is not possible from the records made available by Metro and IBR modelers to replicate their calculations.

Why would sponsors of highway projects want to exaggerate the future growth in traffic levels? Predicting ever higher levels of traffic creates a perceived need for additional highway expansion projects. Highway departments and highway engineers have a personal and professional interest in building more and larger roadways.

1. Travel demand modeling for the IBR

Traffic modeling is the key to assessing the need for the project, determining its financial feasibility and gauging its environmental impact. Errors in traffic modeling lead to mis-stating the need for the project, failing to establish financial viability, and understating its negative environmental effects.

1.1 Modeling is foundational to the I-5 Bridge Replacement Project: It defines the project need, is used to justify its size, and to evaluate the viability of alternatives and to determine

financing. Also, the traffic projections are integral to claims made about the environmental effects of the proposed project and alternatives. As the Federal Highway Administration writes:

> Travel and land use forecasting is **critica**l to project development and National Environmental Policy Act (NEPA) processes. Forecasts provide important information to project managers and decision-makers, and provide foundations for determining purpose and need. They are **essential in evaluating**: the performance of **alternatives**; the estimation of **environmental impacts** such as noise and safety (based on traffic volume or exposure) and emissions (based on traffic volume and speed); induced land develop- ment effects (change in land development patterns due to changes in accessibility); and resulting indirect and/or cumulative effects (such as watershed effects). In short, **travel and land use forecasting is integral to** a wide array of corridor and **NEPA** impact assessments and analyses.
> FHWA, Interim Guidance On The Application Of Travel And
> Land Use Forecasting In NEPA, 2010, page 1. (Emphasis added).

If the travel forecasting used in the preparation of an Environmental Impact Statement is wrong, then the selection of alternatives and assessment of environmental impacts is wrong and violates NEPA.

The Interstate Bridge Replacement Project (IBR) is a joint effort of the Washington State Department of Transportation (WSDOT) and the Oregon Department of Transportation (ODOT). It proposes to replace the existing I-5 bridges over the Columbia River, widen about 5 miles of freeway, rebuild seven freeway interchanges and extend light rail transit from Oregon to Vancouver. If constructed, at a cost currently estimated at up to $7.5 billion, it would be the most expensive transportation project in the region's history.

The need for and key design parameters of the project are predicated on projections of future traffic levels across the Columbia River. WSDOT and ODOT have used their projections of future traffic levels to justify the federally required "purpose and need" statement for the project, to reject specific alternatives which they claim (according to traffic modeling) are not workable, and to justify the need for widening the bridge crossing and approaches.

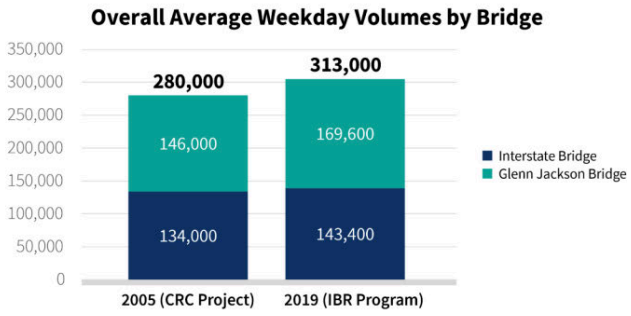
1.2 Oregon and Washington DOTs gather traffic count data.. Traffic projections begin by compiling and analyzing counts of vehicles on existing roadways. These counts are the base data for building travel demand models. ODOT and WSDOT gather traffic data on I-5 and other area roadways. For example, the Oregon Department of Transportation maintains a

Automatic Traffic Recorder (#26-004) at the Interstate Bridge, which counts the number of vehicles crossing the bridge by day and hour, and classifies vehicles by type. The output of this recorder (and hundreds of other recorders on state highways) is reported by ODOT annually on its website. Washington State DOT maintains similar data.

1.3 There are repeated discrepancies between traffic count data reported by the Oregon Department of Transportation and traffic volume levels reported in Metro and IBR reports. The reported I-5 bridge average weekday traffic volume is reported by the IBR variously as 142,400 vehicles per average weekday (per April 2022 presentation to Oregon Legislature) and 143,400 vehicles per day (per July 7 River Crossing Volumes provided to Cortright). IBR documents do not explain this discrepancy between its two estimates or why these figures differ from the traffic recorder data. The IBR and the Stantec Level 2 study both claim that the average weekday traffic on the I-5 bridge in 2019 (the base year for forecasting) was 143,400 vehicles per day.

Traffic Growth Rates

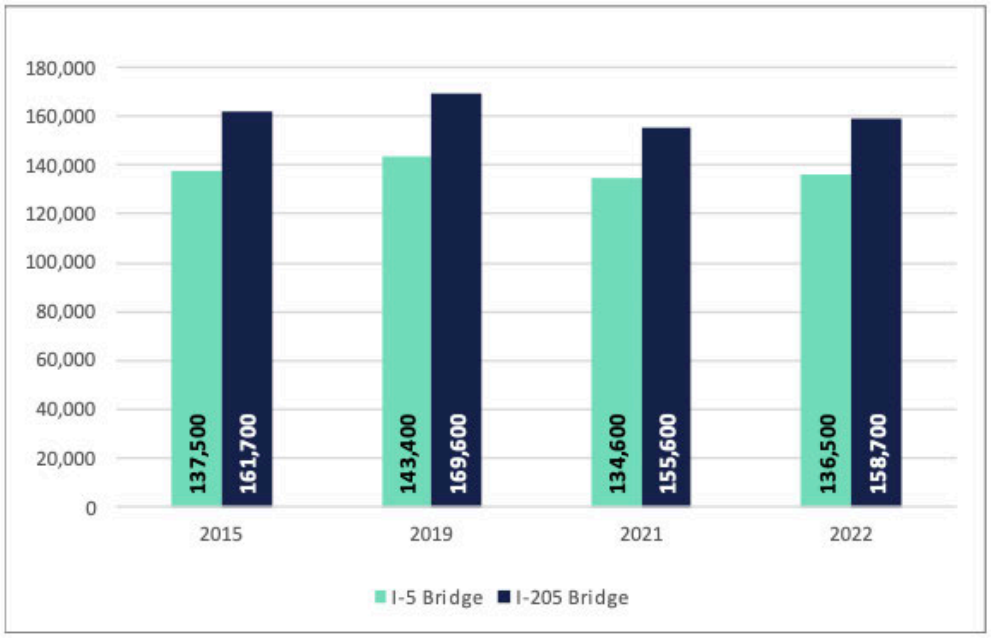
- **Overall average weekday daily traffic (AWDT) increased 12% between 2005 and 2019.**
  - The Interstate Bridge AWDT increased 0.3% per year annually.
  - The Glenn Jackson Bridge AWDT increased 1% per year annually.
  - Of the total growth in river crossing trips (33,000 AWDT), 72% of the increase occurred on the Glenn Jackson Bridge due to capacity constraints and extensive congestion over the Interstate Bridge.



Interstate BRIDGE Replacement Program

November 23, 2021

Figure 2-6. Historical Traffic Trends along the I-5 and I-205 River Bridge Crossings



IBR Level 2 Study, November 2023, page 2-10

That figure does not agree with the data from ODOT's automatic traffic data recorder which reports that average weekday traffic in 2019 was 138,780 per day.

ODOT and WSDOT officials have previously overstated I-5 traffic levels. In presenting the Columbia River Crossing from 2008 through 2011, the two states described the average weekday travel crossing the I-5 bridge as 134,000 vehicles per average weekday. In contrast, ODOT's automatic data recorder reports that 2005 crossings were 132,600 vehicles per average weekday. In litigation over the Columbia River Crossing Environmental Impact Statement, federal defendants conceded that the EIS mis-stated actual levels of traffic on the I-5 bridge in 2005:

> COMPLAINT (Paragraph 86): The traffic estimates used by the FEIS, which form the basis of the CRC project's projected need, are the same as those used by the DEIS in 2008 and based on data collected in 2005. According to the FEIS, reported traffic was 134,000 per day in 2005, whereas data from the Oregon Department of Transportation ("ODOT") puts traffic at 132,600 per day. . . .
>
> ANSWER: 86. Federal Defendants admit that traffic projections for the CRC project were developed from a base of 2005 traffic data. Federal Defendants deny the remaining allegations in the first sentence. Regarding the second sentence, Federal Defendants admit that the traffic volumes cited in the FEIS were 134,000 per day in October 2005. Federal

> Defendants admit that ODOT's reported annual average traffic counts for 2005 was 132,600. Federal Defendants deny the remaining allegations in the second sentence. . . .
>
> Coalition for a Livable Future, et al, v. Federal Highway Administration, et al, Modified Answer (Combined Complaint and Answer). 2 July 2012

1.4 IBR committed errors in stating historical growth rates.

The inaccurate traffic count data leads the Stantec Level 2 study to overstate the recent rate of growth across the I-5 bridges. The Level 2 study claims that between 2015 and 2019, traffic increased by 1.1 percent per year.

> The average weekday river crossings along the I-5 and I-205 Bridges since 2015 are presented in Figure 2-6. Between 2015 and 2019, the traffic on the I-5 Interstate Bridge increased at an annual rate of approximately 1.1% . . .
> Stantec, Level 2 Report, page 2-9

According to the average weekday traffic data reported on the ODOT automatic data recorder website, the actual rate of increase was only half as much—0.5 percent. We examined actual data reported on ODOT's website (https://www.oregon.gov/odot/data/pages/traffic-counting.aspx) for the Automated Traffic Recorder for the I-5 Interstate Bridge. In 2015, average weekday traffic was 135,696 vehicles per day. In 2019, average weekday traffic was 138,700 vehicles per day. This represents an annual rate of increase of 0.55 percent per year, half the rate claimed in the Stantec Report.

1.5 Several agencies are involved in preparing traffic projections. Traffic projections for the I-5 bridge project (like its predecessor, the Columbia River Crossing) were prepared by staff and consultants for WSDOT and ODOT. These projections are based substantially on a regional travel demand model (RTDM) developed and maintained by Portland's Metro regional government. The RTDM is a mathematical representation of the Portland-Vancouver transportation network, and the location of households and businesses. It uses a range of data and equations to estimate the number, origin and destination of trips and assigns them to the traffic network. By iteration, the model adjusts traffic routes to reflect the effects of congestion. The output of the model is estimates for current and future years of traffic volumes and traffic speeds for major segments of the region's transportation system

Key variables in the Metro model include the estimation of the origins and destinations of daily trips and a specification of the regional travel system, especially the maximum

capacity of individual road segments. Metro uses estimates of the dollar value of travel time to model the impact of tolling on traffic levels. Model results are highly sensitive to the value of travel time: too low a value of travel time overstates the impact of tolls on travel behavior; too high a value of travel time understates the impact of tolls on travel behavior. Value of travel time is a variable that is chosen by the modeler.

While the RTDM was produced by Metro, Metro provided the model, in software form, to third parties to modify the assumptions and key parameters and make other forecasts. Metro provided its model results to IBR staff, it also provided the underlying model to consultants (to Stantec, in 2022 for preparation of a Level 2 study), and to CDM SMith in 2013, to prepare an investment grade analysis of the CRC.

State and regional officials and their consultants have prepared multiple models of traffic associated with the Interstate Bridge Replacement Project.

- 2008 Draft Environmental Impact Statement, Traffic Technical Report, (https://www.wsdot.wa.gov/accountability/ssb5806/environmental-process-and-permitting.htm)
- 2011 Final Environmental Impact Statement, Traffic Technical Report (https://www.wsdot.wa.gov/accountability/ssb5806/environmental-process-and-permitting.htm)
- 2013 CDM Smith, Investment Grade Analysis (IGA)
- 2022 Metro RTDM Outputs (April 29, 2022 Excel File)
- 2022 IBR "Post-Processed" Model outputs (from public records disclosure, July 8, 2022)
- 2023, Stantec "Level 2" modeling (Excel, February 27, 2023)
- 2023 WSP Benefit Cost Analysis (Narrative, Excel Spreadsheet, Public Records Request Response).

Key metrics for each of these forecasts are summarized in the following table.

Summary of CRC/IBR Traffic Forecasts

Average Weekday Traffic (AWDT) I-5 Columbia River bridges

			No-Build Forecast		Build/LPA Forecast	
Forecast	Period	Base	Level	AAGR	Level	AAGR
Draft Environmental Impact Statement (2008)	2005-2030	134,000	184,000	1.3%	178,000	1.1%
Final Environmental Impact Statement (2011)	2005-2030	134,000	184,000	1.3%	178,500	1.1%

Investment Grade Analysis (2013)	2012-2036	128,400	138,200	0.3%	109,000	-0.7%
Metro Travel Demand Model (2022)	2019-2045	164,050	190,922	0.6%	164,384	0.0%
IBR Post-Processed (2022)	2019-2045	143,400	176,000	0.8%	175,000	0.8%
Stantec Level 2 Study (2023)	2019-2045	143,400	182,300	0.9%	123,900	-0.6%
Benefit-Cost Analysis (2023)*	2019-2045	11,278	14,291	0.9%	14,211	0.9%

* - Data is Project Area Daily VMT (000s)

1.6 Metro's Kate Travel Demand Model. The foundation of current IBR travel demand estimates is Metro's "Kate" travel demand model. Kate is a regional travel demand model, which estimates daily and hourly travel demand for the Portland Metropolitan area. Of interest for the IBR, the Kate Travel demand model estimates the number of vehicles crossing the Columbia River on the I-5 and I-205 bridges ("screenlines") for the model's base year (2015) and for future years. Metro has produced a series of model runs to estimate traffic on I-5 and I-205 in the current year and through 2045 under a range of assumptions about transportation improvements and varying toll levels for I-5 and other portions of the Portland Metro freeway system. Metro has prepared spreadsheets showing the output of the Kate Model in terms of screenline volumes for the I-5 and I-205 bridges under various scenarios. Data from the April 29, 2022 ("I5_xing_auto_truck_vol_comp_042922.xlsx") version of these estimates is presented here. Metro's modeling results have been substantially similar from October 2021 through February 2023 (latest results provided by Metro in response to a public records request (date). The 2023 estimates of the model remain the same. Metro's Modeling of I-5 traffic for the Locally Preferred Alternative (LPA) has not changed between October 2021 and April 2022. Metro estimates Average Weekday Traffic (AWT) at 190,841 on the I-5 bridges for 2045 in the No-Build Scenario). Similarly, the PM peak hour volumes for 2045 for I5 NB across the Columbia River have also not changed between the October 2021 model runs and the April 2022 model runs. For example, The No-Build Northbound PM peak hour value is 6,375 vehicles per hour in 2045 in the October 5, 2021, April 29, 2022 and February 27, 2023 model runs. The latest results are contained in an February 27, 2023 Excel file labeled, "IBR_L2_SDEIS_I5_I205_xing_auto_truck_022723.xlsx."

1.7 Metro's "Ivan" Travel Demand Model. The previous version of the regional travel demand model, used for the Columbia River Crossing Environmental Impact Statement was prepared by Metro. The data from this model, which estimates traffic for four-hour morning and evening peak travel periods, was "post-processed" by CRC staff (DEIS, Traffic

Technical Report, 2008, page 5-5). The DEIS and FEIS documents disclose neither the original Metro Ivan forecast numbers, nor do they document the calculations used to "post-process" this data. These "post-processed" figures served as the basis for the CRC's purpose and need statement, which was re-adopted verbatim for the current iteration of the IBR project. The post-processed Ivan figures were incorporated into the Columbia River Crossing 2008 DEIS Traffic Technical Report and the 2011 Columbia River Crossing FEIS Traffic Technical Report.

1.8 IBR's "Post Processed" traffic estimates. IBR took the outputs of Metro's Kate Travel Demand Model and "post-processed" them--altered the outputs. IBR's post-processed figures are described in a March 30, 2022 summary of a travel demand review meeting (Regional Modeling Technical Coordination Notes, March 30, 2022) and in a response to a public records request dated June 6, 2022)

1.9 Stantec's "Level 2" traffic estimates. Stantec took Metro's Kate Travel Demand Model and modified several of its parameters, keeping the underlying origin and destination data and network characteristics, but recalibrating the model to better fit observed travel behavior, using a different functional form to model trip choice in response to tolling, and using different values of traveler time. IBR has contracted to pay Stantec $787,000 for this work. In addition, IBR has also paid another consultant, WSP, unspecified amounts to participate in preparing this analysis. Stantec's Level 2 estimates are spelled out in a November, 2023 report: "Level 2 Traffic and Revenue Study."

1.20 CDM Smith's Investment Grade Forecast. CDM Smith was hired by the Oregon and Washington transportation departments to prepare a detailed investment grade analysis of the Columbia River Crossing. CDM Smith took Metro's Ivan Travel Demand model and modified sever of its parameters, keeping the underlying origin and destination data and network characteristics, but recalibrating the model to fit observed travel behavior, using a different method to compute behavioral responses to tolling and using different values of traveler time (computed from a stated preference survey designed to measure local responses to tolling choices created by the Columbia River Crossing project. The Oregon and Washington DOTs paid CDM Smith $1.5 million to undertake this study in 2013-14 (https://projects.oregonlive.com/crc/spending/). CDM Smith's estimates are provided in: Columbia River Crossing Investment Grade Traffic and Revenue Study, December 27, 2013.

1.21 Supplemental Draft Environmental Impact Statement.

The SDEIS contains a different set of estimates for No Build traffic levels on the I-5 Bridges in 2045. In contrast to earlier estimates released by IBR, this table claims that 180,000 vehicles would use the I-5 bridges in the No-Build scenario, rather than the 176,000

vehicles claimed in earlier material. No explanation is provided in the text on how these estimates were obtained.

Table 3.1-11. 2045 Forecast Average Weekday Daily Traffic Volumes on I-5 and I-205

Location	Existing AWDT	2045 No-Build AWDT [a]	2045 Modified LPA AWDT [b]
Total River Crossing	313,000	400,000 (+28%)	389,000 (-3%)
I-5 Bridge	143,400	180,000 (+26%)	175,000 (-3%)
I-205 Bridge	169,600	220,000 (+30%)	214,000 (-3%)

Source: ODOT/WSDOT, Metro/RTC Regional Travel Demand Model, IBR Analysis 2022
a Percentages reflect change from existing conditions.
b Percentages reflect change from 2045 No-Build Alternative.
AWDT = average weekday daily traffic

2. The Metro regional transportation demand model does not accurately predict I-5 bridge traffic.

Metro's regional travel demand model (RTDM), called Kate, doesn't accurately predict current levels of traffic on the I-5 bridges. It consistently over-predicts I-5 traffic, especially at the peak hour. Its predecessor model (Ivan) also incorrectly predicted growth rates for I-5 traffic

The Metro model is seriously flawed: It fails to accurately forecast traffic levels on the I-5 and I-205 bridges, and has failed to accurately project growth rates. Metro's Kate model doesn't accurately predict the future, the present or even the past. Our review of the Metro model outputs and actual traffic recorder data show that the model doesn't accurately reflect either the current level of traffic on I-5 and I-205, or accurately predict the growth of traffic on the two bridges over time.

The Metro model significantly over-estimates traffic on I-5, relative to I-205. The Metro model significantly over-estimates daily and hourly traffic levels on I-5 in the current year, as revealed by Metro's own validation report (which is not published on Metro's website).

2.1. Traffic demand modeling (TDM) is central to the rationale for, evaluation of alternatives to and environmental impact assessment of the proposed Interstate Bridge Replacement Project. IBR staff use TDM estimates of future traffic volumes to specify the size of the project, to include or exclude alternatives (such as a tunnel), and make claims about the different environmental impacts of each alternative.

2.2 The accuracy of travel demand models can be analyzed in several ways. Two important tests are calibration and prediction. Calibration examines whether a model's outputs for current year traffic levels match actual, observed travel levels. Prediction examines whether the growth rate in traffic implied by a model's forecast is borne out in practice.

2.3. Metro's Kate Model validation report shows that Kate systematically over-predicts current year traffic levels on I-5 relative to I-205, and over-predicts overall river crossings. Kate over predicts base year (i.e. 2015/2019) AWDT by almost 20 percent; it also under predicts traffic on I-205. Metro's Kate Model overestimates traffic volumes on the I-5 bridge relative to the I-205 bridge. Metro's Kate model assigns a larger share of cross-Columbia traffic to the I-5 bridge and a lower share of traffic to the I-205 bridge than is observed in practice.

2.4 IBR's own Level 2 study prepared by Stantec concludes that the Metro model overestimates traffic levels on I-5:

> While the calibration of the assignment model was adequate for planning purposes, some limitations were identified in the RTDM assignment process that resulted in overestimated speeds and underestimated travel times along the I-5 and I-205 corridors near the river crossings. As such, additional refinements were performed to the base year 2015 traffic assignment to improve alignment with the observed data. These refinements were performed outside of the RTDM environment, in a base year toll model prepared using RTDM output like demand matrices, highway network, and relevant parameters.
>
> Stantec (https://www.interstatebridge.org/media/sh2lube2/ibr_level-2_tr_report_final_remediated.pdf), page 3-5.

Stantec's Level 2 study corrected for the over-prediction on I-5, and produced a much smaller error. Stantec calibrated its model to the same 2015 base data used in the Metro Kate modeling. Stantec reported a 2.5% RMSE (Root Mean Square Error), just about one-sixth of the error factor for the Metro model. The Stantec version of the model calibrated to within 1 percent of I-5 bridge traffic levels.

2.5 Metro and the IBR continue to use the poorly calibrated Metro RTDM "for planning purposes" even though it substantially over-states actual traffic on the I-5 bridge. It seems clear that Metro and IBR prefer these higher forecasts because (a) they justify a larger project with more vehicle capacity, and (b) they create an inflated "no-build baseline" that systematically conceals or understates the travel-inducing environmental effects of the build alternative.

Comparison of Travel Demand Model Validation

Model (Year)	Calibration Year	Scope	Metric	Error (RMSE)
Metro/Kate (2017)	2015	32 Regional Cutlines	AWDT	14.5%
Stantec/IBR Level 2 (2023)	2015	32 Regional Cutlines	AWDT	2.5%
CDM Smith/CRC IGA (2013)	2010	11 Regional Cutlines	Hourly	2.5%
CDM Smith/CRC IGA (2013)	2010	I5, I205 Bridges	Hourly	0.8%

Sources:

Metro/Kate (2017) Table 14: Auto cutline comparison – Average Weekday

Stantec/IBR Level 2 (2023)	Table 3-3. Toll Model Calibration Summary at Regional Screenlines – Base Year 2015
CDM Smith/CRC IGA (2013)	Table 7-2 Selected Calibration Results for Locations other than the I-5 and I-205 Bridges
CDM Smith/CRC IGA (2013)	Table 7-3 Total Traffic Calibration Results for the I-5 and I-205 Bridge

2.6 As a result of these calibration errors, Metro's model fails to accurately reflect current levels of traffic on the I-5 bridge. Metro's Kate Model estimates of base year (2019) daily screenline volumes are not consistent with observed actual traffic counts. Screenlines are key reference points for computing and reporting traffic volumes in the Kate model. The I-5 and I-205 Columbia River Bridges are both screenlines. The 2019 screenline value estimated by Kate for the I-5 bridge is 164, 500 average weekday traffic (AWT). The value reported by ODOT traffic recorders is 138,530. (For more detailed information on IBR's "post-processed" estimates see section 6, below).

Estimates of Calendar year 2019, Average Weekday Traffic, I-5 Bridge

Source	Estimate	Discrepancy
ODOT, Traffic Count data	138,530	0
Metro, Kate Travel Demand Model	164,500	+18.7%
IBR, "Post-Processed" Estimate	143,400	+3.5%

2.7 In addition to calibrating a model to current or base year levels, we can assess the validity of a model by examining whether it accurately predicts changes in traffic levels over time. The modeled predictions prepared for the Columbia River Crossing using the Metro Model and the CDM Smith toll model provide an indication of the reliability of these two models.

2.8 The Oregon and Washington Departments of Transportation estimated the growth in travel on I-5 in the "No-Build" Scenario using Kate's predecessor model "Ivan,." The results of this model were incorporated in the project's Draft and Final Environmental Impact Statements, issued in 2008 and 2011 respectively. Using a base year of 2005, the model predicted traffic on the I-5 bridges in the "No Build" scenario would rise from 134,000 AWDT in 2005, to 184,000 in 2030. This amounts to an annual growth rate of 1.3% per year over the forecast period.

2.9 The Oregon and Washington Departments of Transportation hired CDM Smith, a national consulting firm to refine the Metro Travel Demand Model (Ivan) for purposes of preparing an Investment Grade Traffic and Revenue Forecast. CDM Smith recalibrated the Ivan model (resulting in a better fit with actual data, i.e. a root mean squared error of 0.8 percent for hourly traffic estimates). The CDM Smith model predicted that traffic in the No-Build Scenario would grow to 138,200 vehicles per day by 2036. The CDM SMith modeling used a base year of 2012, and a base level of traffic of 128,400 vehicles per day. (CDM Smith Figure 2.2). This represents a growth rate of 0.3 percent per year over the forecast period.

2.10 In reality, traffic growth during the first 14 years of that period (2005 to 2019) averaged just 0.3 percent per year. The Metro model predicted a growth rate for this time period of 1.3 percent per year, more than four times faster than the actual growth rate. In contrast, the growth rate prediction of the CDM Smith model almost perfectly corresponds to the observed 2005-2019 growth rate.

2.11 The Metro model is poorly calibrated, inaccurate, and fails to accurately predict future growth. Moreover, all of these errors are biased: the calibration exercise shows the Metro RTDM consistently predicts higher levels of I-5 traffic than actually are observed, and the historical record shows that the Metro model predicts faster levels of I-5 traffic growth than are actually observed.

2.12. Consequences of model over-prediction. Because the model over-predicts current traffic on the I-5 bridges, the growth in traffic on the I-5 bridges in the No-Build scenario, and future levels of traffic on I-5, it exaggerates the traffic congestion that would be expected in the No-Build scenario.

2.13 Millions of Phantom Cars. As the Metro calibration report shows, the Metro model predicted that 2019 average weekday traffic on the I-5 bridge would be 164,050. The actual traffic on the I-5 Bridge was 143,400 according to the IBR project. This amounts to more than 20,000 “phantom” vehicles that appear in the Metro model that do not exist in reality. This amounts to more than 6 million “phantom vehicles” per year.

3. Travel demand models overestimate current and future truck traffic

Metro uses a different model to predict current and future truck traffic on I-5. Its model grossly overstates current truck traffic. Its predecessor also predicted an increase in truck traffic, when in fact truck traffic declined on I-5. The data used to estimate current and future truck traffic levels are inconsistent with reported ODOT traffic counts. Metro's model relies on an outdated, 17-year old survey and hasn't been updated to reflect the latest estimates. The Metro Kate overstates the number of trucks crossing the I-5 bridge by more than 2 million today.

3.1 Truck volumes are estimated separately from passenger vehicles for traffic modeling purposes, in part, because truck traffic is influenced by other factors than passenger traffic, and in part because trucks are expected to pay a proportionately larger share of the cost of the project recovered from tolling. The CRC FEIS describes trucks Trucks are FHWA class 6-13 vehicles.

> ***5.2.7 Service Volumes – Trucks***
> The data and analysis of truck volumes include all medium and heavy trucks. The terms "medium" and "heavy" refer to specific classes in the Federal Highway Administration's (FHWA) 13 vehicle-type classification system. Medium trucks are single unit trucks with three or four axles and comprise FHWA Class 6 and 7. Heavy trucks include all tractor- trailer configurations and may include more than one trailer. Heavy trucks fall into FHWA Classes 8, 9, 10, 11, 12, and 13.
> FEIS, Traffic Technical Report, 2011, page 5-9

The Metro Kate Travel Demand model describes trucks as class 4-13 vehicles.

> Highway vehicle classification counts were used to develop average percentages of heavy vs. medium trucks on the system. This, combined with average weight carried by each vehicle type produced a vehicle split of 70% heavy truck and 30% medium truck. To obtain this split, about 92% of total commodity tonnage is allocated to heavy trucks and the remainder to medium trucks.
>
> Medium trucks are defined as FHWA Class 4-7, or single unit trucks
>
> Heavy trucks are defined as FHWA Class 8 and above, or trucks with one or more trailers
> Metro, Kate TravelDemand Model Methodology, page 73

The Stantec Level 2 study uses the same truck classification scheme

> Vehicle classification count data were obtained from permanent count stations along the I-5 Interstate Bridge and I-205 Glenn Jackson Bridge. The classification data were available by Federal Highway Administration (FHWA) vehicle types, as well as shape-based classes. FHWA classes 4 to 6 were grouped together to represent medium trucks while classes 7 to 13 were considered heavy trucks, which aligns closely with the heavy truck definition in the RTDM, as well as the Oregon Toll Program's proposed shape-based classification approach that would consider vehicles 35 feet or longer as heavy trucks.
>
> Stantec, Level 2 Report, page 2-9

The CDM Smith investment grade analysis uses class 6-13 as medium and heavy trucks because this corresponds to the then-proposed basis for accession tolls based on the number of axles. Class 4-5 vehicles would pay the two-axle toll (same as cars), while class 6-13 vehicles would pay an escalating toll based on the number of axles. (CDM Smith page 2-32).

ODOT reports the number of vehicles by vehicle class crossing the I-5 bridges on its traffic counting website. The following table shows ODOTs data for 2005, 2010, 2015, 2019, and average annual growth rates in truck traffic, by class from 2005 through 2019.

ODOT Traffic Counting Data by Vehicle Class					
					AAGR
Class	2005	2010	2015	2019	2005-19
1. Motorcycles (Optional)	1,308	444	1,019	192	-14%
2. Passenger Cars	84,493	80,376	102,255	105,760	2%
3. Other Two-Axle, Four-Tire Single Unit Vcles.	20,637	29,420	17,543	20,588	0%
4. Buses	1,130	517	476	451	-7%
5. Two-Axle, Six-Tire, Single-Unit Trucks	6,261	2,390	1,733	2,326	-7%
6. Three-Axle Single-Unit Trucks	3,746	1,084	701	903	-10%
7. Four or More Axle Single-Unit Trucks	152	74	106	27	-12%
8. Four or Fewer Axle Single-Trailer Trucks	1,778	579	688	451	-10%
9. Five-Axle Single-Trailer Trucks	4,051	5,889	5,146	4,145	0%
10. Six or More Axle Single-Trailer Trucks	927	1,565	1,482	1,382	3%
11. Five or fewer Axle Multi-Trailer Trucks	520	320	251	192	-7%
12. Six-Axle Multi-Trailer Trucks	241	123	146	109	-6%
13. Seven or More Axle Multi-Trailer Trucks	1,752	407	754	274	-13%
Class 4-13	20,558	12,948	11,483	10,260	-5.0%
Class 5-13	19,428	12,431	11,007	9,809	-4.9%
Class 6-13	13,167	10,041	9,274	7,483	-4.0%
Source: ODOT, Traffic Volumes and Vehicle Classification,					
(http://highway.odot.state.or.us/cf/highwayreports/traffic_parms.cfm)					

3.2 Metro relies on the Federal Freight Analysis Framework 3 (FAF3) estimates of current traffic and projections of freight movement from 2005 to 2035.

> The truck model forecasts the quantity, type, and distribution of truck trips generated by the flow of goods into, out from, and within the 4-county region. The model is based on a commodity flow (CF) database that forecasts annual tonnage flows of 44 commodity groups (2-digit SCTG) by primary mode, origin and destination regions and forecast year (2000 to 2035, in 5-year increments). The CF database was initially prepared for the Port of Portland using Freight Analysis Framework (1997 CFS) data. It was updated in 2005 using FAF2 (2002 CFS) data, then validated and augmented by the regional 2006 trade capacity study. It was most recently updated in December 2015, using a FAF3 (2007 CFS) database provided to the Port in April, 2015
>
> Metro, Kate Travel Demand Model Methodology, 2020, page 68.

The FAF3 data used in the Metro Kate model are more than a decade out of date. The FAF3 data have been superseded by FAF 4 (2012 data) and FAF5 (2017 data). The FAF5 data report much lower levels of truck freight activity than predicted by the FAF3 projections. The FAF5 projections predict much lower levels of truck freight growth in the coming decades than the FAF3 projections. By relying on FAF3 data and projections, Metro over-states the current level of truck traffic in Portland and on the I-5 bridges, and overstates expected future growth in truck traffic as well. Metro's latest Regional Freight Strategy also relies on the FAF3 data.

3.3 Metro did not validate its modeled estimates of truck traffic on I-5. Metro's Kate Validation report makes no mention of truck traffic levels. The report contains no data showing how well Kate truck traffic estimates compare to actual recorded levels of truck traffic in the region, or on the I-5 bridges.

The Draft SEIS claims that regional freight traffic will increase by 45 to 65 percent

> Freight Mobility and Access
>
> Freight transportation in the Portland-Vancouver metropolitan region is estimated to increase by 45% to 65% in the next 25 to 30 years, based on forecasts by Washington and Oregon.

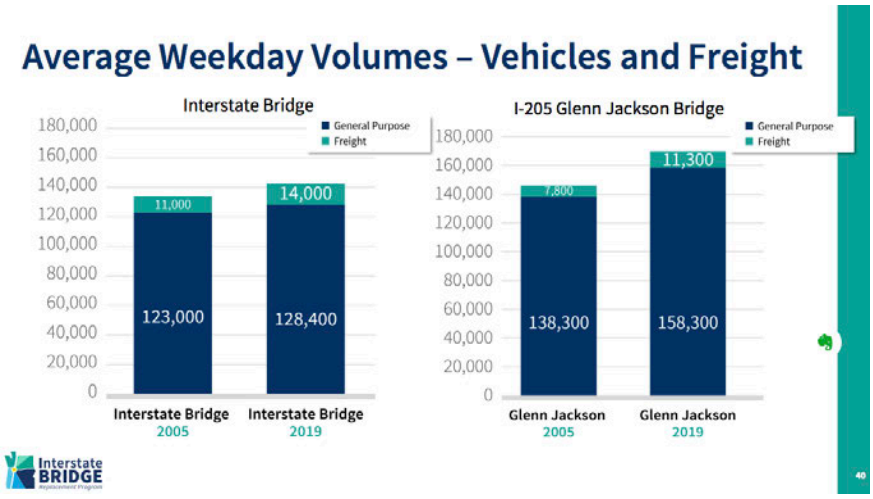
The report contains no citations to applicable studies.

3.4 Metro's Kate model claims current levels of truck traffic across the Columbia River and specifically on I-5 differ substantially from the values reported by ODOT. Metro's model

claims that more than 17,000 medium and large trucks (Class 4-13) per day crossed the I-5 bridge in 2019 (429:cell F7:F10). ODOT's public traffic count data shows that 10,260 Class 4-13 trucks per day crossed the I-5 bridge.

Truck Travel Reported Base Year Volumes					
		Base Traffic (AADT)		ODOT Traffic Count	
	Scope	Year	Level	Level	Difference (%)
CRC Final EIS	Class 4-13	2005	10,985	20,558	-47%
Investment Grade Analysis	Class 6-13	2013	10,512	10,512	0%
IBR Post-Processed	Class 4-13	2019	14,000	10,260	36%
Metro Travel Demand Model	Class 4-13	2019	17,373	10,260	69%
Stantec Level 2 Study	Class 4-13	2019	11,638	10,260	13%

3.5 IBR presented data on historical and current truck usage of the I-5 bridge that differ substantially from values reported by ODOT. In its presentation on traffic forecasting, IBR claimed that daily truck traffic on the I-5 bridge increased from 11,000 trucks in 2005 to 14,000 trucks in 2019 (a growth rate of 1.7 percent per year). According to ODOT's own traffic recorder data, the daily volume of trucks on I-5 declined from 13,167 in 2005 to 9,809 in 2019, an annual decline of -2.1 percent per year.



3.6 Stantec's Level 2 Traffic and Revenue Study confirms that the Metro Travel Demand Model overestimates existing truck traffic by almost 40 percent. The Metro model says trucks make up 9 percent of I-5 current traffic, Stantec says in reality trucks are only 6.5 percent of traffic. This minimizes the overstatement because the Metro model also over-estimates traffic for cars and light trucks as well:

> As shown before in Table 2-3, the heavy trucks constitute approximately 6.5% of total traffic on the I-5 Interstate Bridge. The RTDM estimates heavy trucks to be

about 9% of the total bridge traffic. As such, adjustments were necessary to reallocate the estimated truck trips to the proposed tolling classifications to be consistent with observed truck shares.

Stantec Level 2 Study, page 4-8

3.7 The modeling done for the Columbia River Crossing—using the previous version of the Metro travel demand model—predicted that truck traffic on I-5 in the No-Build scenario would ***increase*** by 2.3 percent per year from 2005 to 2030. The CRC FEIS predicted that truck traffic on the I-5 bridge in the No-Build Scenario would grow from 10,855 trucks per day in 2005, to 19,405 trucks per day in 2030, an increase of 2.3 percent per year. Between 2005 and 2019 (the last pre-pandemic year), truck traffic on I-5 ***decreased*** at an annual rate of 4 to 5 percent per year.

Summary of Truck Traffic Forecasts						
			No-Build Forecast		Build/LPA Forecast	
Forecast	Period	Base	Level	AAGR	Level	AAGR
CRC Final EIS	2005-2030	10,985	19,405	2.3%	19,405	2.3%
Investment Grade Analysis *	2012-2036	10,512	11,800	0.5%	7,700	-1.3%
Metro Travel Demand Model	2019-2045	17,373	28,384	1.9%	18,882	0.3%
Stantec Level 2 Study	2019-2045	11,638	25,500	3.0%	13,800	0.7%
* IGA is Class 6-13, all others are Class 4-13.						
Growth rates are calculated from claimed base year figures, not ODOT actuals.						

3.8 The CRC EIS predicted that the I-5 bridges will carry 19,405 trucks per day in 2030, under both the No-Build and Build Scenarios.

Exhibit 7-10

Peak Period 2030 I-5 Truck Volume - Bridge Alternatives				
	No-Build		LPA	
Hours	Southbound	Northbound	Southbound	Northbound
AM Peak Period 6 AM - 10 AM	1,140	2,195	1,175	1,960
Midday Peak Period 10 AM - 3 PM	3,525	2,900	3,505	3,225
PM Peak Period 3 PM - 7 PM	2,350	1,635	2,335	1,900
Night 7 PM - 6 AM	2,790	2,870	2,790	2,515
Daily Total	**9,805**	**9,600**	**9,805**	**9,600**
Number hours of congestion[1]	7.25	7.75	3.50	2.00
Number trucks traveling in congestion	2,220	3,075	1,275	770

Source: Portland/Vancouver International and Domestic Trade Capacity Analysis, 2006 and CRC Project, September 2009

CRC, Final Environmental Impact Statement, Traffic Technical Report, Exhibit 7-10

3.9 Metro's Kate and Stantec's Level 2 modeling all predict very rapid growth in truck traffic across the I-5 bridge. The Metro RTDM predicted that truck travel on the I-5 bridge would grow from (an incorrectly estimated 17,373 trucks in 2019, to 28,382 trucks in 2045 (No Build), a growth rate of 1.9 percent. The Level 2 forecasts prepared by Stantec (which concede that the Metro model overstated truck traffic on I-5--See section 3.6) estimated that the number of trucks would rise from 11,638 per year in 2015 (computed at 8.8 percent of total traffic) to 25,500 trucks in 2045 (Stantec Level 2 Study page 2-9).

3.10 The Metro Kate truck modeling is based on the Federal Freight Analysis Framework (FAF), which is out-of-date, and which has consistently over-estimated the rate of truck freight growth nationally. The Chief Economist of the US Department of Transportation wrote that these FAF forecasts were prepared for political purposes, and not used for "real decisionmaking":

> Other federal modal administrations prepare forecasts, but it is done more out of curiosity, to provide talking points for their administrators' speeches. The Federal Highway Administration's Office of Freight Operations has for the last several years prepared the Freight Analysis Framework, which forecasts freight flows out 20 years – not just for trucking, but for all modes of freight transportation. But **we don't actually use the FAF forecasts for any real decisionmaking.** The forecasts help to inform the political process in a general way, and **provide ammunition for politicians who want to spend more on transportation infrastructure.**

> Jack Wells, Chief Economist, U.S. Department of Transportation, "The Importance of Transportation Forecasting " Workshop for Transportation Forecasters U.S. Department of Transportation September 22, 2009. Emphasis added.

3.11 FAF forecasts used by ODOT systematically overstate truck traffic growth. The Oregon Department of Transportation relies upon the federal "Freight Analysis Framework" forecasts to predict future truck travel in Oregon. In 2011, ODOT adopted the "Oregon Freight Plan." Its forecasts were based on FAF2 (2002) commodity flow survey data and called for the volume of truck freight to increase 73 percent in 25 years—from 294 million tons to 508 million tons—between 2010 and 2035. This amounts to an annual rate of increase of 2.2 percent per year. In reality, truck volumes have *declined*, rather than increasing. The federal government's latest Commodity Flow Survey, summarized in FAF5, shows total truck volume *lower* now than it was 20 years ago. Trucking volume has declined from 294 million tons per year in 2010 to 229 million tons per year in 2023. We are now nearly half way through the forecast period in the 2011 Oregon Freight Plan, and truck freight has gone down; between 2010 and 2022, truck freight volumes declined at an average annual rate of -1.9 percent per year.

Millions of Tons of Truck Freight Per Year

Oregon Freight Plan (2011 and 2023)

	OFP	OFP
Year	2011	2023
2002	259	
2010	294	
2017		218
2023		229
2035	508	
2050		356

Source: Oregon Freight Plan, 2011 (from FAF2), Oregon Freight Plan, 2023 from (FAF5)

3.12 Port activity has almost no effect on truck traffic on I-5. The scale of truck movements associated with Port activity is wildly exaggerated. Much is made about the importance of the I-5 bridge to freight movements in and out of the Port of Portland and Port of Vancouver. As part of the Columbia River Crossing project, a 2013 study commissioned by Oregon DOT to identify truck traffic reported that:

> It was reported that there are relatively few truck trips going to and from the Port of Portland. According to the Port Import Export Reporting Service (PIERS) approximately 10% of the 500 trips at Terminal 6 would use the bridge, meaning about 50 trucks per day from Terminal 6 use the I-5 bridge.

That's about 1 truck every 30 minutes. The small number of trucks is hardly surprising--the Port of Portland overwhelmingly handles low value bulk commodities, like minerals and grain, that are moved mainly by rail and barge, not truck.

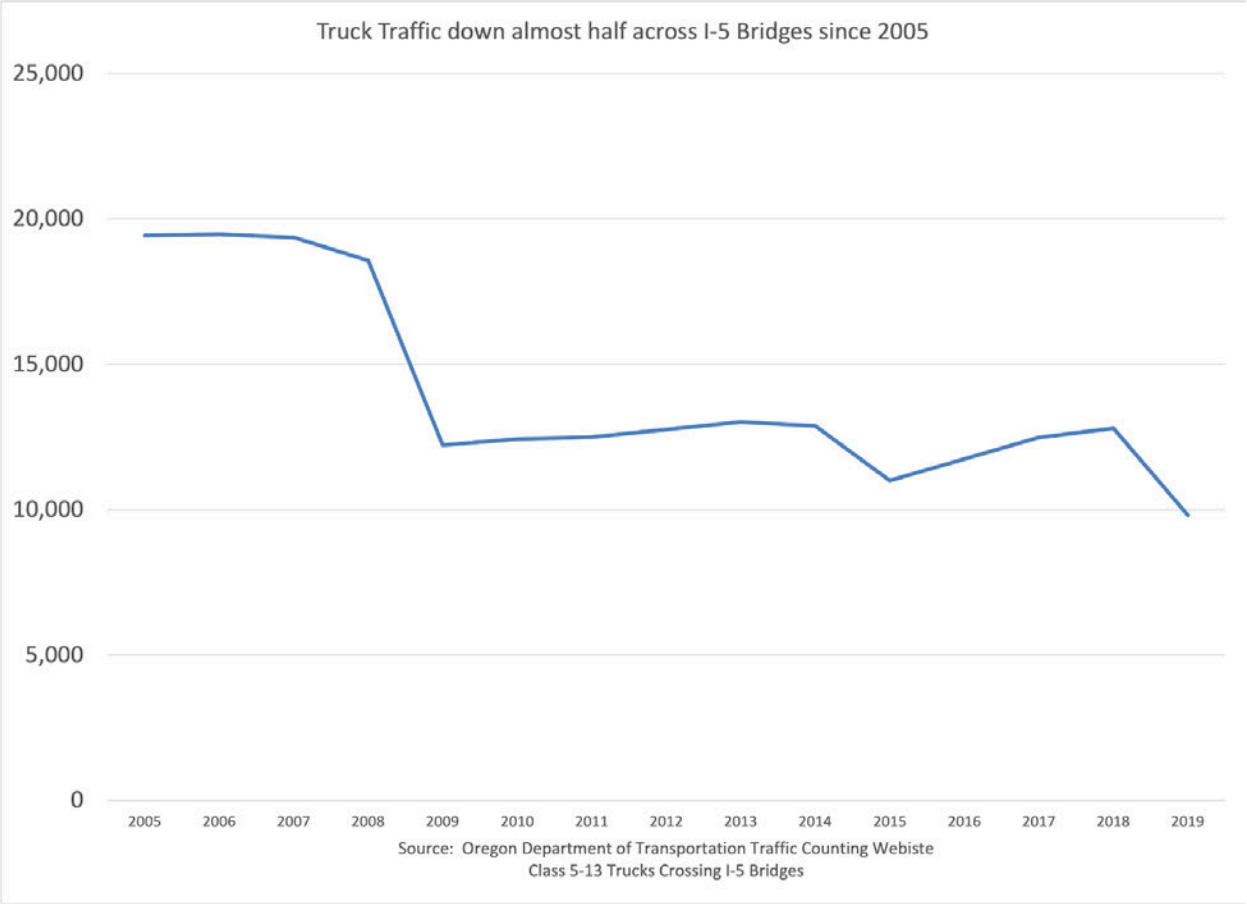
According to the study, neither the Port of Portland nor the Port of Vancouver have data on the origin and destination of trucks traveling to and from the ports. The Port of Vancouver averages about 330 truck trips total, per day, with no evidence of how many cross the I-5 bridge.

3.13 Inaccurate truck forecasts are a major risk to traffic and toll revenue forecasting. Bain calls “less usage by trucks” one of the “common sources of forecasting error:” He quotes Standard and Poor’s research showing that forecasts of truck usage were even more unreliable than those made for cars, and concluding:

> The unreliability of truck forecasts combined with the fact that they are often key revenue contributors underscores the importance of understanding the extend to which toll road cash flows rely on trucking demand.
> Bain, page 42

3.14 Millions of Phantom Trucks

The models for the Interstate Bridge Project greatly exaggerate current and likely future truck traffic volumes. Metro’s RTDM overstates existing (2019) traffic levels by 69 percent, or about 7,000 vehicles per day. That represents more than 2 million annual phantom truck trips in the base year. Metro’s RTDM model also predicts much higher truck traffic growth than is consistent with historical trends. Metro predicts truck traffic will grow 1.9% per year; over the past 20 years, truck traffic over the I-5 bridges has declined by between 4 and 5 percent per year.



The Metro model does not correspond to ODOT traffic count data. Metro has made no attempt to calibrate its model to match observed count data. The Metro RTDM, and other models are based on the out-dated FAF3 data. The FAF data series has significantly over-estimated growth in truck traffic, and according to senior USDOT officials is used for political purposes rather than real decision-making.

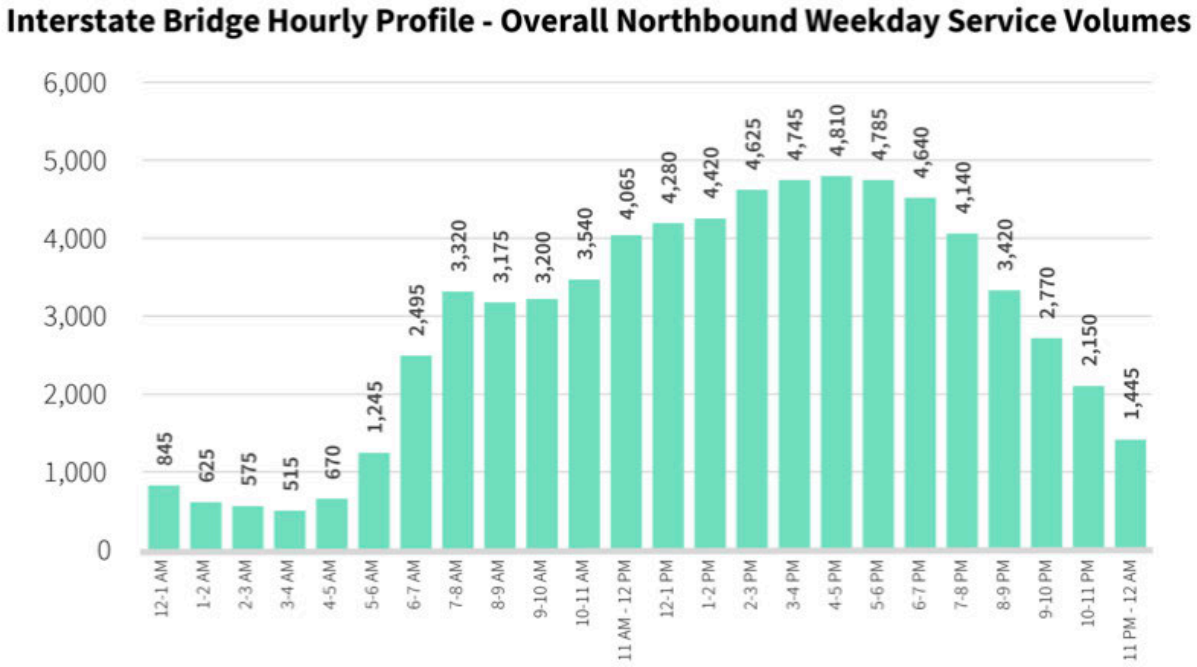
4. Traffic demand models predict traffic that exceeds bridge capacity

The Metro model consistently predicts traffic levels on the I-5 bridge, both in the current year and in future years, that exceed the demonstrated physical capacity of the bridge. The failure to correctly model roadway capacity is a serious model error. The current I-5 bridge can carry no more than about 5,000 vehicles in the Northbound direction in the PM peak hour, yet Metro's model says it now carries more than 6,000. The Metro Model and IBR "post-processed" estimates predict further increases in peak hour volumes in excess of capacity, to 6,700 vehicles (Metro) and 7,700 vehicles (IBR, post-processed) These impossible volumes are then used to predict long delays and justify expanding freeway capacity..

4.1 FHWA Guidance on the preparation of demand estimates requires Metro, WSDOT and ODOT to realistically account for capacity limitations:
https://ops.fhwa.dot.gov/trafficanalysistools/tat_vol3/sect6.htm

> "Constraining demand to capacity. . . care must be taken to ensure that forecasts are a reasonable estimate of the actual amount of traffic that can arrive within the analytical period . . . Regional model forecast are usually not well constrained to system capacity"

4.2 Traffic Count data show that the PM peak hour capacity of the I-5 bridge is currently less than 5,000 vehicles per hour (vph). The IBR reported 2019 hourly traffic counts, as follows:

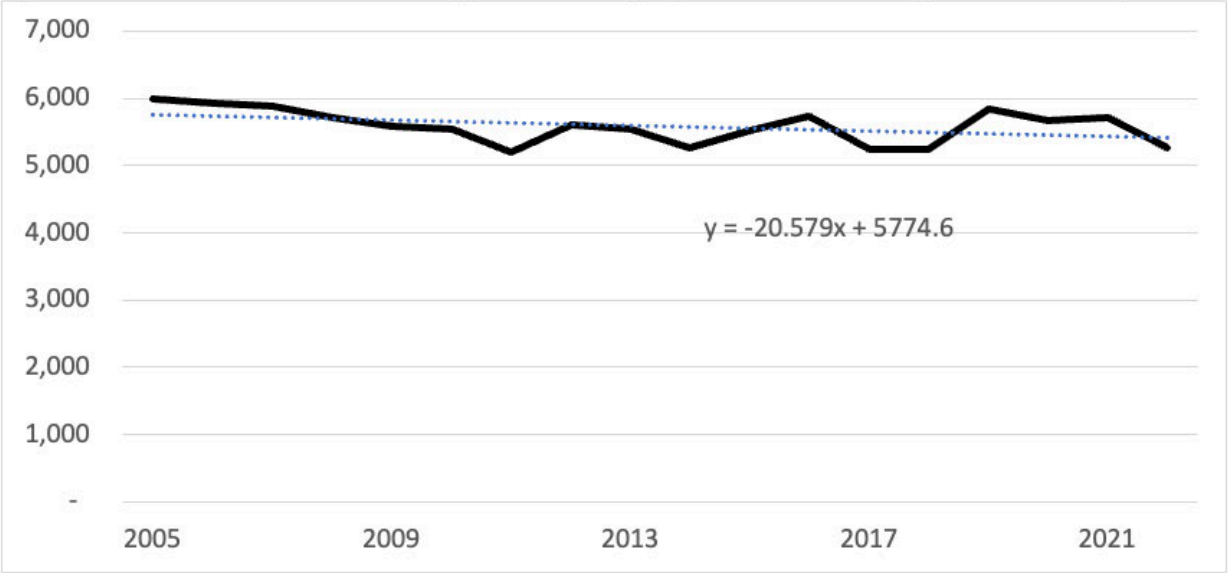


Interstate Bridge Project, Travel Demand Modeling
Coordination Meeting, 30 March 2022, Slide 9. (Obtained by Public records Request).

Maximum Northbound peak 4-hour travel was 4,810 vehicles per hour (vph) between 4pm and 5pm. Annual average weekday peak PM Northbound traffic counts since 2010 have averaged between 4,600 and 4,800 vph, and have not exceeded 5,000 vph. (Regional Transportation Council, Columbia River Bridge Crossings, Average Hourly Traffic Data, https://www.rtc.wa.gov/data/traffic/bridges/hourly.asp?brdg=i5).

Oregon Department of Transportation Automatic Data Recorder counts for the Interstate Bridge show that peak hour, peak direction traffic volumes on the I-5 bridge have been declining since 2005.

Figure 13: Peak Hour Peak Direction Traffic on the Bridge (ODOT Permanent Traffic Count Station)



(Marshall, 2024)

4.3 Traffic forecasters agree that the current I-5 bridges have reached their capacity. The 2013 CDM Smith Investment Grade Analysis prepared for the Columbia River Crossing observed that the I-5 bridges reached capacity in peak hours several years ago and further growth in peak hour traffic wasn't possible due to that physical constraint.

> Traffic under the existing toll-free operating condition on the I-5 bridge **reached nominal capacity several years ago**, especially considering the substandard widths of lanes and shoulders on the facility. The I-5 bridge has little or no room for additional growth in most peak periods, and capacity constraints have limited growth over the last decade.
> CDM Smith, page 8-12.

4.4 IBR has admitted that traffic growth on I-5 has been limited by capacity. In its December 2021 presentation to the Community Advisory Group, it wrote:

> "Of the total growth in river crossings [between 2005 and 2019], (33,000 AWDT), 72% of the increase occurred on the Glenn Jackson [I-205] Bridge **due to capacity constraints** and extensive congestion over the Interstate [I-5] Bridge."
> https://www.interstatebridge.org/media/lafddqwk/12-2-21-cag-meeting-presentation_remediated.pdf (emphasis added)

4.5 Metro's findings of fact for its 2011 Land Use Final Order include a finding that the capacity of the existing I-5 bridges is no more than 5,500 vehicles per hour in each direction. This statement is consistent with data presented in the CRC FEIS showing traffic

flows of up to 5,500 in the southbound direction and 5,000 vehicles per day in the northbound direction.

> The existing I-5 crossing provides three lanes each for northbound and southbound travel, which can accommodate approximately 5,500 vehicles per hour in each direction.
>
> Metro, Land Use Final Order, (Exhibit B Metro Council Resolution No. 11-4280, Findings of Fact and Conclusions of Law, South/North Corridor Land Use Final Order Columbia River Crossing Project, August, 2011, page 23)

4.6 The IBR Traffic Technical Report (June 2024 Version) concedes that the maximum hourly capacity of the I-5 bridges is no more than 1,850 v/l/h or about 4,550 vehicles per hour. TTR, Appendix A, Transportation Methods Report.. File: ibr_tra_tr-appxa.pdf

> However, the highest throughput across the Interstate Bridge (the primary bottleneck in the study area) as well as the ramp terminals just north and south of the Interstate Bridge ranges between 1,550 and 1,850 pc/h/ln. This indicates that the capacity of the Interstate Bridge is near 1,550 to 1,850 pc/h/ln, The HCM capacity estimates of 2,100 to 2,200 pc/h/ln are 20 to 30 percent higher than the capacity of the Interstate Bridge, indicating that the HCM model is not an appropriate analysis tool in this case. The HCM process is not accounting for factors that would further reduce the ideal capacity. Some possible contributing factors not accounted for by the HCM process include the influence of limited sight distance across and approaching the Interstate Bridge, closely spaced interchanges, short merge, diverge, and weaving distances.
>
> June 2024 Interstate Bridge Replacement Program | Page 27

4.7 The current PM peak hour Northbound Hourly traffic volumes estimated by the Metro model exceed the actual physical capacity of the I-5 bridge. Metro's model fails to accurately account for PM peak hour capacity restrictions on the I-5 bridges. Metro's Kate model incorrectly over-estimates current (2019) PM peak hour travel as 6,375 vph, when traffic recorder data show it was 4,800 vph. Metro's validation report does not address the discrepancy between estimated and actual base year peak hour travel.

4.8 IBR's traffic estimates show that peak hour traffic on I-5 has not increased at all since 2005. In its traffic modeling, IBR provides PM peak period Northbound estimates of travel comparing the 2005 volumes claimed in the Columbia River Crossing Environmental Analysis with the current 2019 volumes (these are IBR's "post-processed") estimates of volumes, which exceed the ODOT counts by 20 percent).

4.9 Notwithstanding the existing capacity limitations on the I-5 bridge, the "No-Build" scenario in the Stantec Level 2 study predicts that the I-5 bridges will account for a greater

share of growth in cross-river traffic (43.5 percent) between 2021 and 2046 than they did between 2005 and 2019 (28 percent). The Stantec model offers no plausible explanation as to why traffic on the I-5 bridges (which are already at capacity) can or should grow faster than they have in the past..

4.10. Modeling done for the IBR over-states I-5 bridge traffic levels in the "No-Build" scenario, which produces a false and biased estimate of the environmental impacts of the "Build Option.' Environmental impacts are estimated by comparing the differences between the "build" and no-build" traffic patterns. By overestimating traffic in the "no-build" scenario, the EIS falsely makes it appear that the "build" option is more environmentally beneficial

4.11 Higher levels of traffic in the "EIS" estimates do not represent an environmental "worst" case. ODOT and WSDOT officials assert that they admittedly exaggerated traffic estimates contained in the EIS represent a "worst" case, and that the "L2" and IGA numbers are valid only for financial purposes.

4.12 IBR uses the term "demand volumes" to characterize future traffic levels. This is a euphemism to conceal the fact that these are not predictions of actual levels of travel, but are modeled predictions of the number of vehicles that *might* use the bridge if there were no capacity constraints. The Metro RTDM model allows predicted traffic levels to exceed highway capacity. The SDEIS repeatedly uses the term "demand volumes" in its Purpose and Need Statement (two instances) and in its Traffic Analysis (four instances). A typical passage reads as follows:

> Both daily and during peak periods, the regional travel demand model predicts increased trips across the Columbia River by 2045. Table 3.1-11 shows year 2045 average weekday traffic **demand volumes** for I-5, I-205, and total Columbia River crossings. These are indications of the **predicted demand** for travel across the Columbia River; however, the Transportation Technical Report also evaluates more detailed operational measures to assess how well the facilities could handle future travel demand.
> IBR, SDEIS, Traffic Chapter, (Emphasis added)

The report never defines what it means by "demand volumes" as differentiated from "actual volumes" or simply volumes.

Other reports, notably the 2013 CDM Smith Investment Grade Analysis and the 2022 WSP Level 2 traffic analysis do not use the term "demand volumes" but instead characterize their predictions as "estimates" or "estimated volumes."

5. Travel demand models don't accurately model driver response to tolling

Tolling is an essential part of the IBR project: it is needed to finance the project and manage traffic levels. The Metro model only indirectly estimates the effect of tolling on traffic. Metro's model makes unwarranted assumptions about the value of travel time, leading it to under-estimate the effect of tolling on travel patterns. The Metro model also fails to account for shifts in the time of day of travel in response to variable tolling. By under-estimating the effects of tolls in reducing traffic, IBR is falsely trying to justify a much larger bridge structure and wider highway than is needed to carry future traffic. IBR, ODOT, and WSDOT all falsely characterize more rigorous and precise "investment grade" or "level 3" studies as inapplicable for assessing the environmental effects of tolled roadways. Investment grade studies are not "worst-case" scenarios, are more accurate than DOT "level 1" and "level 2" studies, and tend to over-estimate traffic levels on tolled roadways.

5.1 The value of travel time is a critical factor in the correct estimation of future travel demand. An incorrectly specified value of travel time will lead to inaccurate estimates of traffic levels in a tolled regime. An international expert in the field, Robert Bain calls miscalculation of the value of travel time savings "a common source of forecasting error."

> As a concept, the value of travel time savings (VTTS) lies at the heart of all toll road traffic forecasting models. . . . Toll road traffic forecasting reports need to explain what values of time savings have been used in models, how they have been estimated and how they have been applied— and provide strong justification in each case. (Bain, page 43)

Higher values of time signifies a greater willingness to pay a toll to save travel time, and results in higher estimates of travel on tolled roadways and less diversion to alternative routes and less trip suppression. Lower values of time signify less of a willingness to pay tolls to save travel time, and results in lower estimates of travel on tolled roadways and more diversion to alternative routes and more trip suppression.

5.2 Metro's Kate model does not directly estimate the impact of tolls on travel demand. The model uses an indirect approach, coding tolls as a "time penalty" or impedance for a tolled road segment. For example, if a road segment is tolled, the model is altered to increase the

travel time on that segment, so that the model treats any travel on that segment as slower (and less desirable) than travel on the remaining segments of the model.

5.3. Metro estimates the time penalty associated with a road toll by assuming a value of time, the number of dollars per hour that the average traveler values travel time savings. It uses its assumption of the value of travel time savings to estimate the number of minutes of delay (or time penalty) associated with each dollar of toll charged.

5.4 Different models use different values of travel time. Values of travel time vary by income, time of day, and trip purpose. The Metro TDM uses a value of $24.64 per hour for peak hour travel, CDM Smith uses a value of $15.21 for peak hour travel (for middle income households), Stantec uses a value of $22.74 per hour for middle income households for single occupancy vehicle trips (the category most closely corresponding to peak hour travel). The Metro RTDM uses a value of $16.39 for off-peak trips; CDM Smith uses a value of $13.13 for off-peak trips by middle income households, and Stantec uses a value of $13.99 per hour for single occupancy vehicle home-based shopping trips by middle income households. All values in 2022 dollars.

Comparison of Peak Hour Time Value and Implied Time Impedance

	Value of Time (2010$)	Minutes per Toll Dollar
Metro RTDM (Uncorrected)	19.27	3.1
Metro RTDM (Corrected)	14.28	4.2
CDM Smith (Middle)	11.89	5.0
Stantec Level 2 (Middle)	16.95	3.5

Note: All values converted to 2010$; Stantec reported at $22.74 (2022$); CDM Smith $15.21 (2013$)

Stantec confirms that in the aggregate, the values of travel time it used in its modeling are lower than in the Metro RTDM:

> . . . the VOTs assumed in the toll model for this analysis are generally lower than those in the RTDM . .
> Stantec, Level 2, page 3-4

5.5 Traffic studies offer different bases for their value of travel time estimates. Metro's RTDM says that its value of travel time is taken from a 2015 report from the Oregon Department of Transportation. This publication deals with the economic value of travel, and is not explicitly calibrated to reflect how pricing affects travel behavior. CDM Smith relies on a stated preference survey conducted by the company Resource Systems Group. Stantec does not report the source of its value of travel time figures, which it characterizes as "assumptions."

5.6 Metro's assumption of the value of time is attributed to an Oregon Department of Transportation study.

TollRates_Updated_AAB_JJ.xlsx (Aaron Breakstone_Jennifer John)

Table 1 I-5 Bridge Toll Assumptions & Values of Time for LPA

Time Period	SOV/HOV	Medium Truck	Heavy Truck
Peak Hours			
Value of Time – 2010 dollars	$19.27/hour	$39/hour	$39/hour
Minutes of perceived time per $1.00	3.11	1.54	1.54
Toll Rate	$3.25	$6.91	$13.41
Time equivalent included in assignment	10.34	9.10	17.56
Off Peak Hours			
Value of Time – 2010 dollars	$12.82/hour	$39/hour	$39/hour
Minutes of perceived time per $1.00	4.68	1.54	1.54
Toll Rate	$2.45	$5.28	$10.16
Time equivalent included in assignment	8.01	6.73	12.98

References

[1] The Value of Travel-Time: Estimates of the Hourly Value of Time for Vehicles in Oregon (2015). ODOT PIAU, November 2016

[2] Portland Metro Kate Trip-Based Travel Demand Model, 2018

5.7 As part of its 2013 investment grade analysis for the Columbia River Crossing, under contract to the Oregon Department of Transportation, the traffic analysis firm CDM Smith had conducted a "stated preference" survey. The survey results provided the basis for estimating the value of travel time for Portland area travelers likely to cross the Columbia River and provided separate estimates of the value of time by income and peak and non-peak travel periods. The CDM Smith study estimated that the value of time for middle income travelers at the peak hour was $12.58 in 2013 dollars, or $11.89 in 2010 dollars and $15.21 in 2022 dollars

5.8 The Metro model cites a figure of a value of peak hour travel time of $19.27 (2010$) per hour and $13.82 per off-peak hour. It claims that this figure is taken from a 2017 ODOT report. That ODOT report does not contain a $19.27or the $13.82 figure. The ODOT report

identifies three types of travel (personal local, personal inter-city and "on-the-clock" business travel), each with a separate hourly rate. The weighted average of these three values (weighted by share of travel) is $16.06. The values used in Metro's model correspond to 20 percent higher than this amount for the peak hour ($19.27) and 20 percent lower than this amount for the off-peak hour ($12.84). There is no documentation in the Metro spreadsheet or other available documents to show how these figures were determined. Metro provides no bases or citations for inflating peak travel time values by 20 percent above those contained in the ODOT manual. In addition, the estimates in the ODOT report are expressed in current 2017$; the Metro report apparently did not adjust these dollar amounts to 2010$. The Consumer Price Index for Urban Consumers in 2017 was 245.121, while in 2010 it was 218.076; this means that a one dollar in 2017$ n the ODOT report would actually be about 89 cents in 2010$.

Table 2: Details of Estimated Value of One Hour of Travel-Time by Vehicle Class, Oregon 2017

		Hourly Value	
Category	Share	2017$	2010$
Personal Local Travel	82%	$ 14.50	$ 12.90
Personal Intercity Travel	11%	$ 20.31	$ 18.07
"On-the-Clock" Business Travel	7%	$ 27.34	$ 24.32
Weighted Average		$ 16.06	$ 14.28
Average Minus 20%		$ 19.27	$ 17.14
Average Plus 20%		$ 12.84	$ 11.43

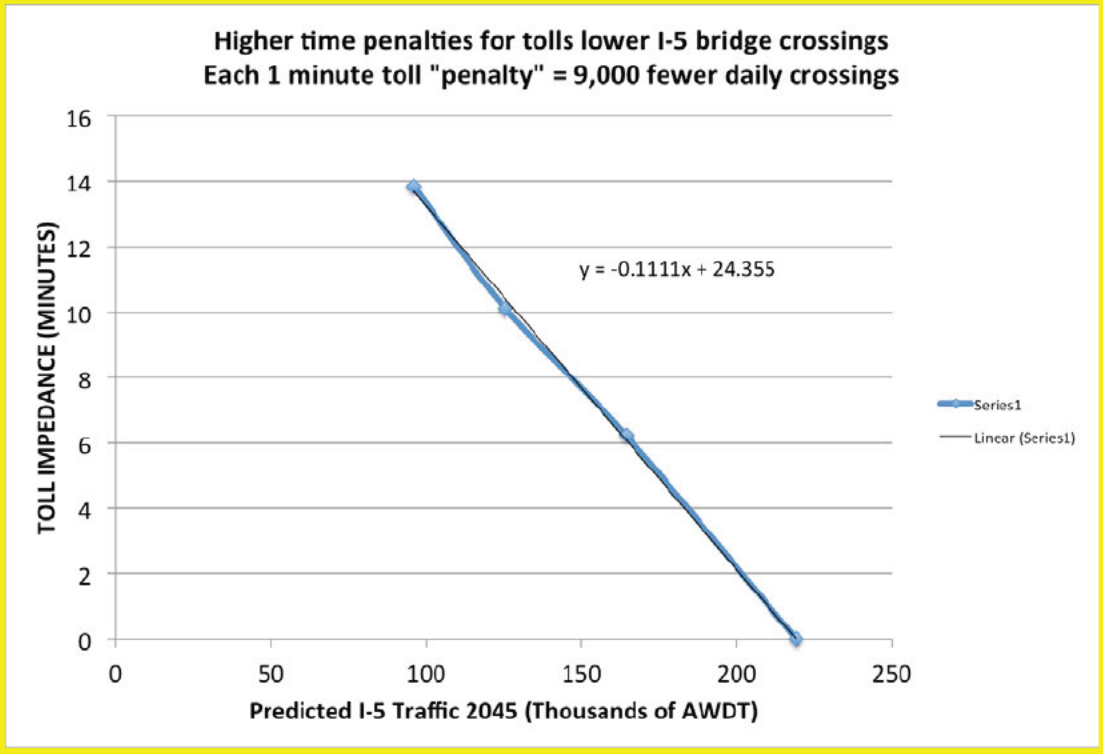
Convert to 2010$	
CPI-U	Index
2017	245.121
2010	218.076
Ratio	0.88967

By failing to correctly adjust for inflation and by arbitrarily inflating the value of travel time in the peak period, Metro has overstated the value of travel time based on the ODOT report. The corrected value of travel time, if one relies on the ODOT report, should be $14.28 per hour in 2010$. This means that Metro's figure of $19.27 per hour is inflated by 35 percent.

Nothing in the ODOT report indicates that this value of travel time is useful or accurate in predicting travel behavior on tolled roadways. Rather, it is a generalized estimate of the aggregate economic value of time; not an indication of the values that drive consumer choice between tolled and un-tolled routes.

The uncorrected Metro travel time estimate implies that each dollar of toll is associated with a time penalty of about 3 minutes. If we correct for the two errors noted above (arbitrarily increasing the estimate by 20 percent and failing to convert to 2010$), the associated travel time penalty associated with each dollar of tolls is more than four minutes. The CDM Smith stated preference survey estimate of $11.89 per hour implies each dollar of toll is associated with a time penalty of about 5 minutes. The value of time in the Stantec survey indicates a dollar of tolls would be associated with about a 3.5 minute time penalty.

In the Metro model, higher time penalties (impedances) are associated with less traffic using the tolled-5 bridge. The following chart shows the relationship between predicted I-5 traffic and the toll impedance (in minutes) implied by the Metro model. Data points are taken from the Metro model. These data show that an expanded I-5 bridge with no tolls would have about 220,000 daily vehicles. A toll equal to a six minute time penalty would reduce traffic to about 160,000 vehicles per day; a toll equal to ten minutes of travel time would reduce traffic to about 130,000 vehicles per day. The line fitted to these points illustrates the "demand curve" for I-5 travel implied by the Metro model.



Because the Metro model uses minute penalties, not actual dollar values, to estimate travel volumes, it is open to question what dollar amount each traveler attaches to a minute of travel time.

5.9 Metro estimated the effect of three levels of tolls, $2.00, 3.25 and $4.45 (in 2010$), equal to $2.56, $4.16 and $5.69 in 2022$. The traffic levels associated with these levels of tolling, as noted above, depend directly on which set of impedance values are chosen. The Metro model uses higher values of time than the CDM Smith and Stantec models.

5.10. Using the CDM Smith stated preference survey estimate of the value of time for middle income travelers instead of the Metro estimate means that the time impedances of each of these tolls would be significantly greater. Metro's (uncorrected) estimates a $2 toll (in 2010$) would impose a time penalty of about 6 minutes, while the CDM Smith value of time estimates that the same toll would impose about a 10 minute time penalty. The difference in the perceived time penalty, according to the Metro travel demand model would have a significant impact on expected ridership. Using the Metro (uncorrected) estimate produces about 164,000 AWDT in 2045; the CDM Smith estimate produces 130,000. The corrected Metro value of time would reduce traffic estimated for 2045 to about 144,000. These are for tolls of $2 (in 2010$). Higher tolls produce even larger reductions in expected future travel on the I-5 bridge. Using the Stantec value of time

estimates in the Metro model would produce travel levels between the uncorrected and corrected Metro estimates.

Effect of Value of Time and Toll Assumptions on I-5 Traffic Estimates, 2045

Price Index	Toll Level		
	$	$	$
2022$	2.00	3.25	4.45
	$	$	$
2010$	2.56	4.16	5.69

Value of Time Assumption	Minutes/$	Minutes/Toll		
Metro RTDM (Uncorrected)	3.1	6.2	10.1	13.8
Metro RTDM (Corrected)	4.2	8.4	13.7	18.7
CDM Smith (Middle)	5.0	10.0	16.3	22.3
Stantec Level 2 (Middle)	3.5	7.0	11.4	15.6

	Implied Average Weekday Trips, I-5 Bridge 2045		
Metro RTDM (Uncorrected)	164,200	129,300	95,800
Metro RTDM (Corrected)	144,400	97,200	51,800
CDM Smith (Middle)	130,000	73,800	19,800
Stantec Level 2 (Middle)	157,000	117,600	79,800

5.11 A value of time consistent with the IGA performed by CDM Smith for the CRC implies that the base level of tolls for the IBR ($2 in 2010$) would reduce traffic on I-5 to 130,000 vehicles per day, according to the Metro model.

5.12 Because estimated future traffic levels depend so directly on the assumptions made about the value of travel time savings, it is important to consider which estimate of the value of time is the most accurate. As noted above, the Metro estimates come from applying data from an ODOT memorandum designed to produce a generalized value of travel time; the ODOT estimates are not based on predictions or observed behavior of people traveling on tolled routes. The CDM Smith estimates of value of time are based on a stated preference survey conducted in the Portland metropolitan area specifically to inform

toll-based travel demand modeling. The Stantec estimates are assumptions made by Stantec, with no specific documentation.

The survey method used by CDM Smith is strongly preferred in the professional literature to assumed or borrowed value of time figures. The Transportation Research Board writes:

> It will always be preferable to estimate VOT (and underlying time and cost coefficients in the utility functions) based on local RP [Revealed Preference] and SP[Stated Preference] surveys.
>
> Transportation Research Board, NCHRP 722, Assessing Highway Tolling and Pricing Options and Impacts: Volume 2: Travel Demand Forecasting Tools, page 52.

Assuming a value of time, or borrowing it from another study raises the uncertainty associated with a forecast. It is preferred to estimate the value of time with data specific to the project in question, gathered from a revealed preference or stated preference survey.

> This [value of time] is a fundamental behavioral parameter in the travel model that always represents a source of uncertainty, simply because of the randomness known to be inherent to travel behavior. It should be determined that the average VOT values applied for each segment are reasonable. **A high risk is assigned to this factor if the VOT value was not estimated, but instead was assumed or borrowed.** No matter how well structured and segmented the model system, a ±20% variation in VOT can generally be considered within the 99% confidence interval. For simple models with poor segmentation, the range should be extended to at least ±40%.
>
> Transportation Research Board, NCHRP 722, Assessing Highway Tolling and Pricing Options and Impacts: Volume 2: Travel Demand Forecasting Tools, page 64. (emphasis added)

Metro's Regional Travel Demand Model and the Stantec Level 2 study both use values of time that are assumed or borrowed, rather than estimated from a stated preference survey specific to Metro Portland or the corridor in question. The CDM Smith study uses travel times from a preferred and more reliable source: a stated preference survey conducted that poses questions about travel in this corridor and this project (i.e. a tolled I-5 bridge). The value of time in the CDM Smith study is a more accurate and reliable estimate, according to professional standards.

5.12 The IBR and Metro staff ignored the CDM Smith Investment Grade Analysis, which is much more precise, and has been accurately validated against real world traffic data with an error of less than 1-2%. ODOT and WSDOT spent $1.5 million to commission this model. It is possible to be vastly more accurate. Also, unlike the CRC/Metro Ivan "No build" forecast prepared for the CRC, the No Build forecast prepared by CDM Smith accurately predicted 2005-2019 traffic growth.

5.13 A key element of the tolling scheme for I-5 is "time of day pricing" – charging higher tolls at peak hours to encourage drivers to take trips before or after rush hours. The Metro model is incapable of modeling shifts in travel time due to peak hour pricing. This is especially important in the I-5 corridor because a high proportion of trips are discretionary shopping trips that are heavily motivated by sales tax evasion. These are exactly the kind of trips that are likely to be affected by time-of-day pricing.

6. IBR altered Metro Forecasts, falsely labeling alterations "post-processing"

IBR claims that its traffic forecasts are an output of the Metro Travel Demand Model. IBR did not use the output of the Metro model. Instead, it altered the outputs of the Metro model. These alterations further exaggerate already inflated peak hour traffic levels on I-5. The adjustment of these figures, which IBR falsely labels as "post-processing" don't even follow from the methodology the project claims to have used. IBR has failed to document its so-called "post-processing" adjustments to Metro model outputs.

IBR staff made a series of undocumented changes to Metro model outputs, arbitrarily increasing some traffic volumes and decreasing others, which it characterizes as "post-processing."

6.1 While IBR officials claimed that their future travel forecasts were drawn from the Metro model, they failed to disclose that they did not use the actual outputs of the Metro model, but instead subjected them to a series of alterations, which they call "post-processing." IBR never publicly disclosed its "post-processing" the Metro Kate model outputs until after being challenged to reveal travel demand information in a public records request.

Contrary to public claims made by IBR officials and other project partners, IBR did not simply use the outputs of the Metro Model. IBR project director Greg Johnson testified for example, that the traffic modeling came from Metro. Johnson testified to the Metro Council on January 6, 2022, the IBR's numbers came from Metro travel projections:

> The question regarding the investment grade traffic study. That's one that we're going to have our folks look deeply into as far as the timing, but I do want to want to correct a misnomer. That investment grade traffic study is not to size the bridge. What sizes the bridge is the data that we take from the regional models that are a part of Metro and RTC . . .
> Greg Johnson, Metro Testimony, January 6, 2022

Greg Johnson testified to the IBR Executive Steering Group at its January 20, 2022 meeting that IBR's numbers were the results of Metro's models:

> So we're still working tremendously hard running models. The data gathering is done now. It's data sorting and data input into the models, so that is an ongoing process. we're hoping within the next month and a half to two months to start taking the results of those models and start putting the IBR solution or the locally

> preferred alternative, the draft locally preferred alternative on the table uh for for this group and our advisory groups to start looking at and giving us feedback

Matt Ransom, RTC Director, and member of the IBR Executive Steering Group (ESG) publicly maintained that it was the region's modelers, not agency officials, that determined what went into the models, and that the modelers were "walled off" from the policy people. November 17, 2021 ESG at approximately Timestamp: 1:44
https://youtu.be/k_-uOrevXFk?list=PLlzHp4MXqDjb7vAI42U8Dyb1QCItof9ht&t=6309

> Ryan, thank you for the presentation. I think Ryan was being a little bit too modest: the reality is, and I can vouch for this and I'll say it publicly: the Metro/RTC model is best in class and so what that means I think for this work, and it adds on to I think what President Peterson just said, best in class for comparing alternatives against each other.
>
> I think we need to be careful and just a word of caution for all of us. The absolute numbers are not the prediction of the future -- it's a model, it's a forecast, it's a set of hypotheses about what may occur. But the math that underlies these analysis tools is best in class. So rest assured I think for all partners that are looking at this.
>
> Second is the scenarios themselves. There are a lot of questions being asked and a lot of "do this" "do that" kind of statements being made. I want people to understand, those that are watching this and that will then look at the data when it comes out the team that does this is walled off from people like myself. They're walled off from others that might be around this table, the policy people, let's say the people that are asking these broad questions or proposing different hypotheses.
>
> That's important and the reason why that's important is these people spend their lives work making sure that the tool has the best math, the best integration of social characteristics, economic characteristics, so on and so forth. We want them to be true analysts and they are such so when we see the data that comes out it's best in class and it's also produced by people that don't have a, let's say, a reason to make it be what it ends up.
>
> Being they're siloed; they're walled off. The analysis outputs will be what they are and I think again for the public and public trust in this conversation. There's always so much like. I want to see this in the model with full faith in Ryan's team, full faith in the RTC/Metro teams and I think I look forward to seeing the results.

In 2022, Greg Johnson claimed that the project's modeling was "owned" and "created" by the planning organizations. ODOT's Greg Johnson testifying at the Joint I-5 Bridge Committee hearing on December 12, 2022.

> Rep Boshart--Davis asked:
>
> Mr. Johnson, you had mentioned that the IBR doesn't do the modeling. I think you said RTC and Metro does the modeling and provides that to you. Do you have the breakdown of the assumptions used for or the equation the data and the assumptions used for that modeling? And if so, would you be able to pass it on to the committee?

And Mr. Johnson answered:

> Yes we can. We provide the data. It is a model that is owned by both of these entities. . . . This model has been recognized nationally as an excellent tool; one of the best tools that is owned by planning organizations. It is my understanding of the evaluation of the model that these folks have created and all. So yeah, we can get to what our inputs are, and demonstrate to you what our assumptions are going into the model.

6.2 The term "post-processing" is technical jargon in the traffic forecasting profession. It refers to making alterations to the output of a travel demand model. Two "handbooks" on transportation modeling called NCHRP 255 and 765 describe how to use post-processing to develop more detailed estimates for particular times or particular road segments not estimated directly by a computerized regional travel demand model. Often times the outputs of regional travel demand models only include daily travel volumes (ADT or AWT), or only include multi-hour time periods. Similarly, regional travel demand models may only include travel volumes for a multi-roadway corridor, rather than individual roads. In these cases, the coarser outputs of RTDMs have to be interpolated to provide finer values for specific times (like a peak hour from 5 to 6 pm), or for a particular roadway. Other times, model outputs are for a different forecast year, and must be interpolated or extrapolated to match a planning year. None of these conditions apply to the IBR analysis. In the case of the IBR, neither temporal nor geographic interpolation is required for the Metro RTDM because it directly models hourly volumes for the I-5 and I-205 bridges for the horizon planning year (2045). NCHRP 255. Pedersen, Neil J., and Donald R. Samdahl. "Highway traffic data for urbanized area project planning and design." NCHRP Report 255 (1982)

6.3 IBR failed to document its post-processing changes or produce the required spreadsheets required by Oregon's adopted Analysis Procedures Manual. IBR failed to

follow either the practices spelled out in the professional literature for applying such methods or its Oregon DOT's Analysis Procedures Manual. Both of these call for providing spreadsheets or similar written calculations showing input data, describing assumptions, and generally enabling a third party to understand and replicate the calculations. ODOT's own Analysis Procedures Manual (which spells out how ODOT will analyze traffic data to plan for highway projects like the IBR), states that the details need to be fully displayed:

> 6.2.3 Documentation
> It is critical that after every step in the DHV [design hour volume] process that all of the assumptions and factors are carefully documented, preferably on the graphical figures themselves. While the existing year volume development is relatively similar across types of studies, the future year volume development can go in a number of different directions with varying amounts of documentation needed. Growth factors, trip generation, land use changes are some of the items that need to be documented. If all is documented then anyone can easily review the work or pick up on it quickly without questioning what the assumptions were. The documentation figures will eventually end up in the final report or in the technical appendix.
> The volume documentation should include:
> - Figures/spreadsheets showing starting volumes (30 HV)
> - Figures/spreadsheets showing growth factors, cumulative analysis factors, or travel demand model post-processing.
> - Figures/spreadsheets showing unbalanced DHV
> - Figure(s) showing balanced future year DHV. See Exhibit 6-1
> - Notes on how future volumes were developed:
>
> If historic trends were used, cite the source.
> If the cumulative method was used, include a land use map, information that documents trip generation, distribution, assignment, in-process trips, and through movement (or background) growth.
> If a travel demand model was used, post-processing methods should be specified, model scenario assumptions described, and the base and future year model runs should be attached
> ODOT, Analysis Procedures Manual,
> https://www.oregon.gov/odot/Planning/Pages/APM.aspx

6.7. IBR made substantial changes to the outputs of the Metro model. IBR changed both the estimates of average weekday traffic, and peak hour traffic. IBR also altered the estimates of base period (2019) traffic from those used in the Metro model. (Both the IBR base period traffic estimates and the Metro Kate model traffic estimates are inconsistent with Oregon Department of Transportation traffic recorder data (See section 1).

Comparison of 2045 No Build and LPA Forecasts from Kate and IBR (Post Processing)
Average Weekday Volumes

KATE OUTPUT (4/29/22 Spreadsheet)	I-5	I-205	River Total
NB CT (NoBuild)	190,841	200,129	390,970
LPA CT (Locally Preferred Alternative)	164,384	217,482	381,866
Difference between LPA and No Build (%)	-14%	9%	-2%
IBR Post-Processed (7/8/22 PDF)			
NB CT (NoBuild)	176,000	215,000	391,000
LPA CT (Locally Preferred Alternative)	175,000	207,000	382,000
Difference between LPA and No Build (%)	-1%	-4%	-2%
Post Processing Changes			
NB CT	-14,841	14,871	30
LPA CT	10,616	-10,482	134

IBR's post-processing made substantial changes to the outputs of the Metro model. IBR reports totally different volumes for I5 and I205 than Metro's Kate model. IBR reports that PM peak hour 2045 NB traffic will be 6,905 (No Build) and 7,735 (LPA). Metro's 429 modeling reports that peak NB traffic in the No Build will be 6,375 and 6,735 in the LPA. IBR has increased volumes (7735/6735) 8.3% and (6905/6375) 15% respectively. IBR seems to have added exactly 1,000 vehicles to the PM NB peak volume estimate from the Metro model in the LPA.

6.8 The Metro Kate Model directly estimates hourly volumes on the I-5 bridge as a model output. These model outputs don't need to be "post-processed" to produce peak hour estimates of travel volumes on the bridge. Instead, IBR has labeled its changes to the modeling as "post-processing."

6.9 In July 2022, ODOT offered a one paragraph description of its post-processing methodology in response to a public records request. IBR failed to provide any evidence (tables, spreadsheets) showing how these figures were calculated. The actual "post-processed" outputs don't conform to an application of the described procedure. IBR has provided no other documentation showing how Metro Kate Model outputs were "post-processed" to generate the daily and hourly travel estimates.

6.10 IBR described its alterations to the Metro model outputs (what it called "post-processing") as follows:

The general post-processing approach applied to the IBR Program is as follows:

- Calculate the growth rate between the existing Base Year 2015 travel demand model and the Horizon Year 2045 travel demand model (30 years of growth). The 2015 and 2045 travel demand models are developed jointly by Metro and RTC (two regional Metropolitan Planning Organizations).
- The 30 years of growth is factored down to account for the IBR Program using 2019 as the base year and 2045 as the horizon year (only 26 years of growth).
- The factored 26-year growth from the Travel Demand Model is then applied to the existing 2019 count data to estimate future weekday volumes.

IBR, June 1, 2022 Public Disclosure Request—Traffic Volume Interstate Bridge Replacement Program | DOCUMENT: "3_and_5_VolumeForecasts.pdf"

Materials disclosed pursuant to a public records request also summarize the "post-processing" steps undertaken by IBR. The March 30, 2022 Modeling Technical Coordination Meeting Notes describe "post processing" adjustments as follows:

Post Processing

- The IBR team walked through how volumes were post processed.
  - The post-processing steps are documented in the Transportation Methods & Assumptions Report.
  - The IBR team is following the standard methods per National Cooperative Highway Research Program (NCHRP) reports 255 & 765.
  - Process was reviewed and approved by all partner agencies in Fall 2021.
- *Step 1: Summarize 2019 counts*
  - 2019 counts were summarized, and peak period ramp and freeway volumes were adjusted to reflect demand volumes.
- *Step 2: Obtain Regional Travel Demand Model (RTDM) volumes for 2015 and 2045*
  - Traffic volumes from the RTDM were used to calculate growth between base year (2015) and horizon year (2045).
  - This process was completed for both No Build and Build scenarios.

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- *Step 3: Calculate and Assign Growth*
  - Growth is calculated at screenline levels because the RTDM is calibrated at screenline levels vs individual ramps.
  - For example, all northbound on-ramps north of the bridge are grouped together and growth is distributed between them.
  - The same process was applied to on- and off-ramps both directions on both sides of the river.
- Draft post-processed I-5 AM Peak and PM Peak 4 Hour Volumes for 2019, 2045 No Build and 2045 Build were presented to the group.

IBR, Regional Modeling Technical Coordination, NOTES, March 30, 2022, IBR_Modeling_Meeting_3.30.22_Notes.pdf (Post Processing Methodology).
obtained via public records request

6.11 IBR modelers elide the differences between actual traffic counts and "demand volumes." IBR used two different terms to describe the current (2019) level of traffic on the I-5 bridges. In its response to our public records request IBR says the predicted model growth rate was applied to "the existing 2019 count data." In the Notes from the 30 March 2022 modeling meeting, IBR says the model growth rate was applied to "2019 counts . . . adjusted to reflect demand volumes." IBR never identifies these adjustments. Modelers often describe the difference between actual recorded traffic levels and higher volumes predicted by the models as "unmet demand." This "unmet" demand is not actual, observed traffic; rather, it is cars that the model predicts would use the roadway if sufficient capacity existed. These are at best "potential" trips, and are an indication of how additional roadway capacity would induce additional travel. Using these fictional trips as the basis for calculating "No-Build" traffic levels overstates traffic, exaggerates the "need" for the project, and conceals the fact that expanding the roadway leads to even more trips, and greater environmental impacts.

6.12. What IBR calls post-processing, involves extracting the growth rate from the Metro model and applying it to a different base level of traffic. The table below replicates the steps described in IBR's post-processing methodology: computing a 30-year and 26-year growth factor, revising the base year level of traffic, and applying the 26-year growth factor to the revised base year traffic figure.

6.13 The Kate Model predicts an annual growth rate of 0.63 percent per year in I-5 traffic in the No-Build scenario. IBR's post process model calls for calculating the 30-year growth from the Kate model and factoring down that growth to 26 years. The Kate model predicts 2015 No-Build weekday traffic of 157,990 (again, miscalibrated), and 190,922 in 2045. This implies an annual growth rate of 0.63 percent. For a 30-year period this implies traffic levels will increase to 1.21 times the base traffic level, and for a 26-year period, traffic levels will increase to 1.18 times the base traffic level. (See Steps 1-2 on the table below).

6.14 Altering the base year traffic estimate. Between Metro's travel demand model, IBR's "post-processing," and ODOT's traffic recorder data, we have three different figures for base year traffic data. The Metro Kate model claims that base year 2019 average weekday traffic on the I-5 bridge is 164,050 vehicles per day. The fact that IBR does not use this figure is an implicit acknowledgement of the calibration errors in the Metro model (see Section 2). The IBR claims that 2019 average weekday traffic on the I-5 bridge was 143,400 vehicles per day. ODOT's traffic count data from station ATR-26-004 show that 2019 average weekday traffic on the I-5 bridge was 138,530. (Step 3)

6.15 Applying the growth factor to the 2019 base level weekday traffic. Applying the 26-year growth rate factor of 1.18 (from Step 2), to the 2019 level of base level traffic produces a 2045 estimate of No-Build weekday I-5 traffic of 168,835 (using the IBR base estimate) and 163,102 (using the actual traffic count base estimate). (Step 3). Neither of these estimates is consistent with the IBR projection that 2045 "post-processed" No-Build average weekday traffic would be 176,000 per year. (Step 4)

6.16 The IBR "post-processed" estimate of No-Build average weekday traffic is more than 7,000 vehicles per day higher than the result one obtains by multiplying the 26-year growth factor by IBR's stated 2019 base traffic level. The IBR post-processed estimate of 2045 weekday No-Build traffic is nearly 13,000 vehicles higher than the actual recorded level of 2019 weekday traffic. (Step 5)

6.17 A key question is how much more traffic is projected in 2045 in the "No-Build" Scenario than is extant in the 2019 base year. The IBR post-processing claims that No-Build I-5 traffic will increase by 32,600 vehicles between 2019 and 2045 (176,000-143,400). The replication of the stated post-processing methodology suggests that No-Build I-5 average weekday traffic will increase by about 25,000 vehicles between 2019 and 2045, regardless of base year values.

6.18 The values reported by IBR as the results of its post-processing are not consistent with its described methodology. IBR's base year (2019) estimate of 143,400 vehicles per day and end year (2045) estimate of 175,000 vehicles per weekday imply a growth rate of 0.79 percent per year, much higher than the Kate model growth rate of 0.63 percent per year. Alternatively, if one accepts the end year (2045) estimate of 175,000 vehicles per weekday and the Kate growth rate of 0.63 percent, that implies that the real base year (2019) estimate is actually 149,500. Again, because IBR did not document its post-processing steps, it is impossible to know the source of these discrepancies.

REPLICATE "POST PROCESSING"	I-5 Bridge Average Weekday Traffic			
1. Calculate 30 year growth rate per model from 2015 to 2045				
2015 Metro Base Year Estimate	157,990			
2045 Metro Horizon Year Estimate	190,922			
Annual Growth Rate (LN Estimate-LN Base)/30)	0.63%			
30 Year Growth	1.21			
2. Factor down growth rate to 26 year period (2019 to 2045)				
Annual Growth Rate (from Step 1, above)	0.63%			
26 Year Growth	1.18			
3. Apply 26-year growth rate to "existing 2019 count data"	2019	2045	Delta 2019-45	CAGR
A. IBR "Base"	143,400	168,835	25,435	0.63%
B. ODOT Traffic Count "Base"	138,530	163,102	24,572	0.63%
4. IBR Reported Postprocessed values	143,400	176,000	32,600	0.79%
5. Difference between IBR reported and calculated values (4-3)				
A. Compared to IBR "Base"				
Variance (IBR Reported - Calculated)		7,165	7,165	
Percent		4.1%	22.0%	
B. Compared to ODOT Traffic Count "Base"				
Variance (IBR Reported - Calculated)		12,898	8,028	
Percent		7.9%	24.6%	

6.19 IBR has post-processed the output of Metro's Kate model to try to compensate for the error in Kate's I-5/I-205 split: It has manually re-assigned about 15,000 vehicles per day from I-5 to I-205.

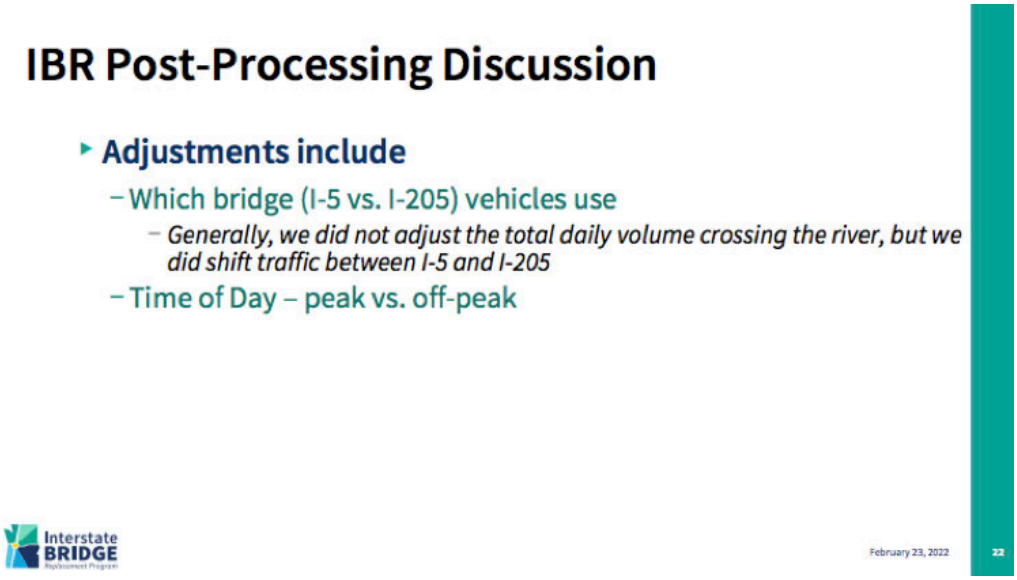
6.20 IBR's alterations to Metro model outputs made contradictory changes to I-5 bridge volumes: decreasing volumes on a daily basis to less than those from the Metro model, and increasing volumes for PM peak hours from the Metro model. While its post-processing moved traffic from I-5 to I-205 on a **daily** basis, IBRs post-processing moved traffic from I-205 to I-5 on a PM **peak hour** basis. IBR's estimate of PM Peak hour travel NB I-5 in 2019 is 6,290, which is higher than both the Kate model (5,740) which overpredicts this volume and the actual recorded data (4,800 vph)(See Section 4, above).

6.21 IBR's post processing admits one error in the Kate forecast (getting the base level of traffic on I-5 wrong), but fails to correct a second error in the Kate forecast (over-predicting the growth of traffic on I-5 relative to I-205). The post-processing between Kate and IBR lowered daily I-5 traffic counts by 15,000, but kept the same predicted growth rate in traffic from 2019 through 2045). Essentially IBR's post processing is saying that even though Kate can't accurately predict the current level of traffic on I-5 (an easy task), we can count on it to accurately predict the rate of growth in traffic for the next 25 years (a much more difficult task)..

6.22 IBR's post-processing produced unexplained and contradictory adjustments to traffic levels on the I-5 and I-205 bridges. For the terminal year (2045), for the No-Build, IBR post processing *increased* the peak hour traffic volumes on the I-5 bridge by 8 to 15 percent compared to Kate estimates. In post-processing, IBR *decreased* the *daily* traffic volumes on the I-5 bridge by 11 percent (190,122 vs 169,600) compared to Kate estimates. In post-processing IBR *increased* pm peak hour NB volumes on the I-5 bridge by 8 percent (6,905 v. 6,375).

6.23 IBR's "post-processing" used the 2045 estimate of total river crossing traffic taken from the Metro Kate Model without alterations. This table shows the estimated 2045 traffic levels on the I-5 and I-205 bridges from the Metro Kate Model and the IBR's post-processed values, for the no-build and for building the locally preferred alternative. The two forecasts predict exactly the same levels of total traffic across the river under the two different scenarios: about 391,000 vehicles in the no-build and 382,000 in the LPA (far right column). These differences are solely due to rounding. So clearly the post-processing accepted the river crossing totals from the Kate model without modification.

6.24 IBR's post-processing changed the allocation of traffic between the I-5 and I-205 bridges, allocating more traffic to I-205 in the no-build scenario and more traffic to I-5 in the build scenario. In the No-Build, post processing moved about 15,000 trips from the I-5 bridge to the I-205 bridge. In the case of the LPA, the post-processing moved about 10,000 trips from the I-205 bridge to the I-5 bridge. This means that the IBR Post processors think the Kate model is wrong by about 15,000 trips in one direction in the no-build, and wrong by about 10,000 trips in the opposite direction in the LPA. No explanation is offered why the two scenarios have such sizable changes with the opposite sign. Clearly IBR is not accepting the allocation of traffic by the Kate Model.



IBR, February 23, 2022 Modeling Presentation,
file: TDM_Modeling_Meeting_2.23.22_PPT_Slides.PDF
(obtained via public records request)

That's apparent when we focus on what the two models say about the differences between the No-Build and the LPA. The Kate Model says that building the LPA will result in 25,000 fewer trips on I-5 than in the No-Build, and about 17,000 more trips on I-205. The post processed estimates claim that building the LPA will reduce the number of trips on I-5 by 1,000 compared to the No-Build, and that the number of trips on I-205 will also decline, by 7,000, compared to the No-Build. In short, Kate says the LPA will have large impacts, and shift traffic from I-5 to I-205 (a 14% reduction on I-5 and a 9% increase on I-205). The post processed numbers say that the effects of building the LPA will be tiny, and will result in a 1 percent reduction of traffic on I-5 and a 4% reduction on I-205. Kate says building the LPA will shift traffic to I-205; IBR's "post-processing" claims that won't happen.

6.25 IBR's adjustments to Kate outputs increase the over-prediction error for I-5 PM NB peak hour traffic. Kate forecasts no-build traffic of 6,375 vehicles in the PM peak hour in 2045; IBR's post processing increases No Build PM peak hour NB traffic to 6,905 an increase of 8 percent.

Comparison of Kate Model Outputs to IBR "Post Processing"					
PM Peak Hour (5PM-6M) Northbound Hourly Volumes					
Kate Model Outputs (4/29/22)				Growth Rates 2019-2045	
	Existing (2019)	2045NB	2045 LPA	No Build	LPA
"Kate"	6,290	6,375	6,735	0.05%	0.26%
IBR "Post-Processed Outputs (7/8/22)					
	Existing (2019)	2045NB	2045Aux1	2045NB	2045Aux1
"Post-Processed"	5,720	6,905	7,735	0.72%	1.16%
Difference					
Volume	(570)	530	1,000		
Percent	-9%	8%	15%		

Peak period data: IBR_Modeling_Meeting_3.30.22.pdf

6.26. If we apply the same post-processing methodology to the hourly data that IBR applied to the weekday data, this implies an even lower level of peak hour traffic. The stated IBR post-processing method is to apply the Kate 2019-2045 growth rate to the actual observed 2019 count. The Kate growth rate for the NB I-5 PM peak hour is 0.05 percent per year (or a 1.33 percent **total** growth over 26 years). If we apply this Kate growth rate to the **recorded** PM peak hour traffic on I5 NB in 2019 (alternately 4,600 or 5,080 vehicles), that implies that "post-processed" peak hour travel should be between 4,660 and 5,150 vehicles per hour in 2045. This implies that IBR's peak hour NB traffic estimate is overstated by between 1,800 and 2,200 vehicles per hour, ie. between 36 and 44 percent.

6.27 Among traffic projections for the I-5 bridge, only the estimates prepared by the Interstate Bridge Project claim to have been "post-processed." A text search of the CDM Smith Investment Grade Analysis shows no occurrences of the term "post-process. " A text search of the Stantec Level 2 study shows no occurrences of the term "post-process." As noted above, each of these studies is based on the Metro model, with a different calibration and a different value of time, and added toll diversion elements.

6.28 IBR uses the term "post-processing" to describe the alterations it made to the outputs of the Metro Regional Travel Demand Model. But "post-processing" of these model outputs are not needed to address either temporal or geographic gaps in the model because Metro's TDM outputs data for the I-5 bridges on an hourly basis. IBR failed to follow professional practice and Oregon DOT's "Analysis Procedures Manual" in documenting its "post-processing" calculations. IBR's post processing made contradictory adjustments to peak hour and daily traffic flows. IBR's adjustments cannot be replicated by following the description of post-processing it has provided.

7. IBR and Metro modelers failed to follow their own professional standards and federal and state guidelines

Traffic modeling is guided by a series of professional and administrative guidelines. IBR and Metro modelers did not follow or violated these guidelines in many ways as they prepared their traffic demand modeling. IBR modelers

- *Didn't assess accuracy of their previous modeling*
- *Failed to calibrate their model to observed traffic levels*
- *Failed to accurately reflect capacity constraints*
- *Failed to use the exhibit scientific integrity*
- *Failed to document their data and methods*
- *Failed to commission an independent review of their analysis*

7.1 Failed to review accuracy of previous modeling

Federal Guidelines direct agencies to look-back at the accuracy of their past forecasts; neither Metro nor IBR reported that their previous forecasts were dramatically in error.

The Federal Highway Administration specifically directs NEPA analysts to examine previous traffic forecasting efforts, prior to undertaking new forecasts.

> Before producing new forecasts, it is useful to critically review past efforts to be aware of the prior work and to improve on or complement that work.
> FHWA, Interim Guidance On The Application Of Travel And Land Use Forecasting In NEPA, 2010, page 6.

The National Academy of Sciences report on traffic modeling recommended that agencies (like Metro, ODOT and WSDOT) that undertake traffic modeling periodically report how accurately their previous forecasts predicted actual traffic levels:

> *Recommendation 3: Periodically report the accuracy of forecasts relative to observed data.*
>
> The project team recommends that agencies responsible for producing traffic forecasts periodically report the accuracy of their forecasts relative to the outcomes measured when the roads are in service. Doing so will accomplish several things:

- Such reporting reveals any bias in the traffic forecasts, such as the observation in this research that observed traffic is, on average, 6% lower than forecast. Even if that bias cannot be attributed to a particular source, understanding its presence and magnitude provides more information to the decision making process.

- It also provides the empirical information necessary to estimate the uncertainty surrounding their traffic forecasts, as described in Recommendation 1.

> National Academies of Sciences, Engineering, and Medicine. 2020. *Traffic Forecasting Accuracy Assessment Research*. page S-10

The IBR staff and Metro staff failed to analyze the accuracy of their earlier forecasts made for the CRC as directed by federal guidelines and these earlier forecasts dramatically over-estimated future traffic growth on I-5. As part of the CRC, IBR made 25-year projections of traffic levels on I-5 and I-205, using Metro's "Ivan" model—a predecessor of its current "Kate" model. That modeling predicted that traffic would grow 1.5 percent per year between 2005 and 2030. In fact, through 2019, traffic grew only 0.3% per year.

IBR dutifully reported this historic trend in their presentation, but failed to divulge that this was a significantly slower growth rate than their earlier CRC modeling predicted. In short, IBR and Metro modelers have done essentially nothing to "mark-to-market" their traffic predictions: They have ignored the historical evidence of the past decade and a half which shows their earlier modeling was simply wrong. This is contrary to the recommendations of the National Academy of Sciences and the guidelines of the Federal Highway Administration..

The latest iterations of the Metro and IBR models repeat the same mistakes as their earlier modeling, predicting a rapid acceleration in traffic growth from the established patterns of recent years. They predict in the "No-Build" condition, average weekday traffic levels on I-5, which have grown 0.3 percent per year for the past 15 years, will more than double to 0.63 percent (or 0.79 percent) per year for the forecast period from 2019 to 2045.

7.2 Failed to Calibrate Model to Actual Travel Volumes

Travel models are known to have errors and inaccuracies. In order to minimize such errors, FHWA guidance directs states preparing NEPA documents to validate their traffic modeling.

> In the context of a NEPA study, it is important for the study team to **focus any calibration** and validation efforts that they undertake **on the study area**. Typically, a regional travel demand model will have been adequately calibrated and validated at least at a regional level prior to adoption. While it is important for the study team to critically review the

> documentation of this effort, it is suggested that **more emphasis be placed on checks at the study area level**. It is suggested that the study team **scale their calibration and validation effort according to the scale of the analysis, such as its geographic scope**.
> ***Calibration*** A meaningful calibration effort would include: . . .
> • Comparison of modeled traffic volumes with traffic counts both for individual roadway segments and at more aggregate levels such as throughout the study area
> Federal Highway Administration, Interim Guidance On The Application Of Travel And Land Use Forecasting In NEPA, March 2010, page 10 (emphasis added)

IBRs failure to undertake this required calibration of Metro's model is material because the Metro Kate model over-predicts peak hour north-bound travel on this section of I-5. This information is contained in Metro's own model validation result. The traffic screenline corresponding to the I-5 Bridge is "Cutline E-16". According to Metro's validation report, the Metro model overestimates PM peak hour northbound traffic at this cutline by 18 percent (Metro, 2017 Kate v1.0 Trip-Based Demand Model Validation Report for Base Year 2015 DRAFT VERSION, August 2017, Table 15).This over-estimation of traffic leads the model to predict more congestion that actually occurs, and means that the benefits of the project are exaggerated, and its environmental effects are understated.

7.3 Failure to Analyze Capacity Constraints

Metro and IBR have ignored FHWA Guidance to realistically account for capacity limitations: https://ops.fhwa.dot.gov/trafficanalysistools/tat_vol3/sect6.htm

> "Constraining demand to capacity. . . care must be taken to ensure that forecasts are a reasonable estimate of the actual amount of traffic that can arrive within the analytical period . . " Regional model forecast are usually not well constrained to system capacity)
>
> Federal Highway Administration, Traffic Analysis Toolbox, 2019.

As noted in Section 4 (above), the PM peak hour Northbound capacity of the I-5 bridges is about 5,000 vehicles per hour. This fact is independently acknowledged by IBR and ODOT consultants. Even so, the Metro and IBR modeling estimates peak hour Northbound travel flows in 2019 of 5,740 and 6,290 respectively, roughly 16 to 25 percent in excess of capacity. (See Section 6, above). Both the Metro and IBR models predict that in the No-Build Scenario, peak hour Northbound traffic levels will continue to increase, by 2045 reaching (6,375 - Metro) and (6,905 - IBR) (See Section 6, above). As modeling expert Norm Marshall has pointed out, these predictions of traffic that exceed capacity are indicative of model error.

7.4 Failure to Fully Document "Post processing"

As noted in Section 6 (above) the IBR project claims to have "post-processed" the outputs of the Metro travel demand model. Post-processing of model outputs is not technically necessary because the Metro travel demand model directly estimates hourly volumes of the I-5 bridges as a model output. (Post-processing is ordinarily only justified when a model doesn't provide estimates for a roadway segment or time period, and model outputs have to be interpolated to provide these results.)

In addition, ODOT's own rules for conducting "post-processing" require that the modeler document their post-processing calculations. IBR failed to document its post-processing changes or produce the required spreadsheets required by Oregon's adopted Analysis Procedures Manual. IBR failed to follow either the practices spelled out in the professional literature for applying such methods or its Oregon DOT's Analysis Procedures Manual. Both of these call for providing spreadsheets or similar written calculations showing input data, describing assumptions, and generally enabling a third party to understand and replicate the calculations. (See Section 6.3).

7.5 Lack of Transparency

In effect, IBR's traffic modeling is a "black box" that presents only partial and incomplete information about key data values, methodology and actual calculations. This process is not transparent and subject to analysis or replication by independent reviewers. This violates accepted practice for transportation modeling. NCHRP Report #765 states:

> It is critical that the analyst maintain personal integrity. Integrity can be maintained by working closely with management and colleagues to provide a truthful forecast, including a frank discussion of the forecast's limitations. **Providing transparency in** methods, computations, and **results is essential.** . . . The analyst should document the key assumptions that underlie a forecast and conduct validation tests, sensitivity tests, and scenario tests—**making sure that the results of those tests are available to anyone** who wants to know more about potential errors in the forecasts.
> National Cooperative Highway Research Project Report, "Analytical Travel Forecasting Approaches for Project-Level Planning and Design," NCHRP Report #765
> .

See Section 14 for more detail on how the Interstate Bridge Project systematically obstructed public availability of modeling data and methodology.

7.6 Lack of Scientific Integrity

Federal regulations require that material included in and relied upon in an Environmental Impact Statement have scientific integrity.

> Agencies shall ensure the professional integrity, including scientific integrity, of the discussions and analyses in environmental documents. Agencies shall make use of reliable existing data and resources. Agencies may make use of any reliable data sources, such as remotely gathered information or statistical models. They shall identify any methodologies used and shall make explicit reference to the scientific and other sources relied upon for conclusions in the statement. Agencies may place discussion of methodology in an appendix. Agencies are not required to undertake new scientific and technical research to inform their analyses. Nothing in this section is intended to prohibit agencies from compliance with the requirements of other statutes pertaining to scientific and technical research.
> 40 CFR § 1502.23 (Emphasis added).

Courts have said that agencies are required to provide specific references to the scientific research they rely upon:

> The court in its order on the cross-motions for summary judgment found BLM violated NEPA because it did not provide citations in the Environmental Assessment (EA) to the studies upon which it relied in its analysis of the impacts of the grazing decisions on the sage grouse and pygmy rabbit. . . . The court found this omission was a violation because NEPA requires agencies to ensure professional and scientific integrity by setting forth the methodologies used and making "explicit reference by footnote [to] the scientific and other sources relied upon for conclusions in the statement." *Earth Island Inst. v. U.S. Forest Serv.,* 442 F.3d 1147, 1160 (9th Cir. 2006), *abrogated on other grounds by Winter v. Natural Res. Def. Council, Inc.,* 555 U.S. 7 (2008) (citing 40 C.F.R. § 1502.24).
>
> *Guardians v. Bureau of Land Management*, No. 2:10-cv-02896 KJM KJN (E.D. Cal. Jan. 8, 2014)

The IBR project has failed to incorporate all of the information at its disposal. Notably, it has failed to use the more precise estimates from the CDM Smith Columbia River Crossing study. In 2013, the states of Oregon and Washington commissioned CDM Smith to prepare a revenue forecast for the predecessor version of this project, the Columbia River Crossing. This analysis used the then-current version of Metro's Regional Travel Demand Model,

along with different assumptions about value of traveler time savings and behavioral responses to tolling to generate its own forecasts of future traffic levels on I-5. The two states spent more than $1.5 million with CDM Smith to create a "Level 3 model" which the IBR and industry sources indicate is more detailed and more reliable than the Level 1 or Level 2 modeling done for the project (See Section 11, below). CDM Smith validated their model against actual traffic levels on I-5; the CDM Smith model showed a less than 1 percent variance with actual travel levels, compared to an 18 percent over-prediction of traffic levels for Metro's Kate travel demand model. The CDM Smith report predicted much lower growth in traffic in the No-Build scenario, much lower traffic levels in the Build scenario than ODOT and WSDOT included in their estimates for the Columbia River Crossing EIS.

The IBR project makes no mention of the CDM Smith modeling effort. Even though the CDM Smith model is more precise (Level 3, not Level 1 or 2), and even though its validation report shows it is more accurate than the Metro RTDM, the IBR project disregarded this modeling in preparing its estimates for the IBR project. Failing to consider and incorporate more accurate modeling techniques (which these agencies commissioned and paid for) is evidence of a lack of scientific integrity.

7.7 Failure to undertake independent review of traffic projections.

The US Department of Transportation has provided guidance on the preparation of traffic and revenue forecasts for tolled facilities. It calls for an independent review of projections. US DOT writes:

> The professionalism, accuracy, and credibility of traffic and revenue forecasts, and the reports presenting them, are always subject to review. A senior-level peer review, internal and/or external, is therefore necessary. An internal review concurrent with the analyses and report preparation can be very effective (i.e., quality assurance and quality control). An external peer review by an independent third party can greatly improve its credibility with potential investors, lenders, government officials with oversight and approval responsibilities, and others. To improve the credibility of the reviewer, his or her background, contractual charge, timeframe, and budget/cost may be revealed.
>
> U. S. Department of Transportation, Guidebook on Financing of Highway Public-Private Partnership Projects, December 2016, Page A-3
> https://www.fhwa.dot.gov/ipd/pdfs/p3/p3-toolkit_p3_project_financing_guidebook_122816.pdf

The Federal Highway Administration's guidance for preparation of NEPA analyses for highway projects directs agencies to include in their documentation either the results of any peer review or an explanation of why a peer review was not included.

> Other elements to consider for inclusion in the documentation are: . . .
> Results of any peer reviews or an explanation detailing why no peer review was required.
>
> Federal Highway Administration, Interim Guidance On The Application Of Travel And Land Use Forecasting In NEPA, March 2010, page 16

Neither Metro nor IBR commissioned a "senior level" peer review of their modeling efforts. The EIS makes no mention of any peer review of traffic modeling, nor does it contain an explanation of why no independent review was undertaken. An external review of the earlier modeling efforts by ODOT and WSDOT for the predecessor project (the Columbia River Crossing) concluded that the traffic modeling was flawed and significantly overestimated future traffic levels. Bain's independent review, prepared for the Oregon State Treasury, concluded that the description of modeling activity in project reports was confusing and dated, that no mention was made of recent historic traffic patterns, and that the modeling failed to reflect the slowdown in traffic growth compared to earlier years. Bain, Robert, *Columbia River Crossing: Review of Traffic & Revenue Reports and Related Material Summary Report*, RBCONSULT Ltd, London, 4 July, 2011

7.8 Failure to document reasonableness and reliability of value of time estimates. The Federal Highway Administration Guidance on NEPA directs transportation forecasters to document the reasonableness and reliability of their value of time estimates.

> While there are different methods that can be used to estimate demand for a managed lane or a toll facility (e.g., diversion curves, toll mode choice models, or traffic assignment methods that incorporate time and cost), for each approach to be successful it is recommended that the basic components leading to the demand estimate (trip distribution patterns by market segment, **values-of-time**, and travel time differences) **be demonstrated to be reasonable and reliable**.
> Federal Highway Administration, Interim Guidance On The Application Of Travel And Land Use Forecasting In NEPA, March 2010, page 13

As noted in Section 5, above, the Metro Travel Demand model borrowed its estimates of the value of time from another source, and did not establish that these values were reasonable or reliable, especially for predicting behavioral responses to tolling. Stantec's value of time

estimates were assumed and not documented, and are specifically disclaimed in the report. Neither Metro nor Stantec utilized the results of CDM Smith's 2013 stated preference survey of project area travelers (which is the preferred source of travel time estimates). The value of time estimates in the Metro and Stantec models have not been demonstrated to be reasonable and reliable for modeling purposes.

7.9 Failure to document assumptions. FHWA guidelines direct NEPA traffic analyses to comprehensively disclose assumptions used:

> It is important for NEPA documentation to include enough technical detail to explain complex information in an understandable manner and present information in a way that is easy to follow for agency reviewers, courts, and the public. In addition to explaining the technical information, it is important for agency reviewers, courts, and the public to understand **the reasoning behind how analytical methods were chosen, what assumptions were made, and who made those choices**. The study team can take several steps to achieve this balance, as outlined in a 2005 NCHRP report:
> Identify and Explain Key Assumptions. The technical analyses contained in NEPA documentation generally are based on a series of assumptions. For example, travel forecasts are based on assumptions about future population and employment trends, and future transportation investments. It is important for decisions regarding these underlying assumptions to be reached using a reasoned approach. Also, **it is important for the assumptions themselves to be reasonable in order for the results of the forecasts to be reasonable**. Therefore, in presenting technical information, it is important for preparers of NEPA documentation to **specifically identify key assumptions and explain why those assumptions were made.**
> Describe Methods Used to Develop Forecasting Results. The persuasive power of technical data depends heavily on the reader's confidence in the methods used to generate those data. **If the reader cannot understand how the data were developed, the reader is essentially being asked to "take it on faith."** Thus, describing the methodologies used to develop the data can enhance the credibility of NEPA documentation. This approach requires more than giving the name and version of the model used; it requires explaining in simple terms how that model works and what type of information it provides. It also means explaining any inherent limitations in that model.
> Federal Highway Administration, Interim Guidance On The Application Of Travel And Land Use Forecasting In NEPA, March 2010, pages 36-37

IBR has failed to document the reasonableness of many of the key assumptions in its modeling, including the value of time estimates (from the Metro Model), and the "post-processing" it did of Metro model outputs.

Other modeling, including the Stantec modeling, specifically refuses to establish whether the assumptions made are reasonable. Stantec's Level 2 forecast concedes that its results are based on assumptions that are open to question, and that alternative, and equally reasonable assumptions could produce materially different estimates of travel behavior (and toll revenue):

> In many instances, a broad range of alternative assumptions could be considered reasonable with the availability of alternative toll schedules, and any changes in the assumptions used could result in material differences in estimated outcomes. (Stantec Level 2 report, page vi).

Stantec specifically disclaims liability for its choice of assumptions. This turns their study into an essentially hypothetical "what if" exercise, based on un-documented assumptions made by the authors. They disclaim liability for use of these estimates.

> By their very nature, assumptions regarding information or data are accepted as true or certain to happen without actual proof of same. **Stantec and WSP used assumptions to generate the Forecasts & Estimates in this Report.** Many statements contained in this document that are not historical facts are forward-looking statements, which are based on Stantec's or WSP's **opinions**, as well as **assumptions** made by, and information currently available to, the management and staff of Stantec or WSP. Because the statements are based on expectations about future events and economic performance, and are not statements of fact, actual results may differ materially from those projected. The assumptions and resulting forecasts could change based on a variety of factors, including but not limited to: (a) economic conditions; (b) social and demographic conditions; (c) force majeure; (d) changes in operations and maintenance of the toll facility represented in the Report; and/or (e) new or changed transportation network or transit systems in the Portland/Vancouver region. These potential risks and uncertainties may be magnified by the transitory or permanent effects of the COVID-19 pandemic on mobility, travel, and the economy.
> (Stantec, Level 2 report, page vii, emphasis added)

8. IBR has used incorrect traffic modeling to create a false purpose and need statement for the project

The NEPA environmental review for the IBR project is predicated on a "Purpose and Need" Statement that relies on demonstrably inaccurate and now outdated forecasts of future traffic levels. The "Purpose and Need" statements exaggerate future traffic growth and are used to justify an over-sized bridge.

8.1 The Purpose and Need Statement for the Interstate Bridge Project (carried forward directly from the 2008 Columbia River Crossing project EIS), assumes that the region will experience and needs to accommodate a 35 percent increase in I-5 traffic, regardless of whether an expanded crossing is built. That projected growth rate has been demonstrated to be incorrect.

8.2 USDOT's guidance on NEPA calls for the "Purpose and Need" statement to be revised to reflect better information.

> "The purpose and need section of the project may, and probably should, evolve as information is developed and more is learned about the project and the corridor. "
>
> U. S. Department of Transportation, NEPA Implementation: The Importance of Purpose and Need in Environmental Documents," September 18, 1990, https://www.environment.fhwa.dot.gov/legislation/nepa/guidance_purpose_need.aspx

8.3 The purpose and need statement of the IBR originated with the Columbia River Crossing in 2005. The project's original purpose and need statement, drafted prior to the publication of the Draft Environmental Impact Statement read as follows:

Project Need

The specific needs to be addressed by the proposed action include:

- **Growing Travel Demand and Congestion:** Existing travel demand exceeds capacity in the I-5 Columbia River crossing and associated interchanges. This corridor experiences heavy congestion and delay lasting 2 to 5 hours during both the morning and afternoon peak travel periods and when traffic accidents, vehicle breakdowns, or bridge-lifts occur. Due to excess travel demand and congestion in the I-5 bridge corridor, many trips take the longer, alternative I-205 route across the river. Spillover traffic from I-5 onto parallel arterials such as Martin Luther King Boulevard. and Interstate Avenue increases local congestion. The two crossings currently carry over 260,000 trips across the Columbia River daily. Daily traffic demand over the I-5 crossing is projected to increase by 40 percent during the next 20 years, with stop-and-go conditions increasing to at least 10 to 12 hours each day if no improvements are made.

I-5 Columbia River Crossing, Statement of Purpose and Need, January 17, 2006

Elsewhere, the project's problem statement claims:

> Increased Travel Demand Daily traffic demand over the I-5 bridge is expected to increase by more than 40 percent in 20 years, from 125,000 vehicles in 2000 to 180,000 vehicles in 2020 (traffic is expected to further increase beyond 2020; new travel demand modeling is currently being conducted to predict 2030 levels).

8.4 The purpose and need statement was revised slightly in later work on the Columbia River Crossing. As expressed in the project's 2011 Final Environmental Impact Statement, the purpose and need statement read as follows:

1.3.2 Project Need

The specific needs to be addressed by the proposed action include:

- **Growing travel demand and congestion:** Existing travel demand exceeds capacity in the I-5 Columbia River crossing and associated interchanges. This corridor experiences heavy congestion and delay lasting 4 to 6 hours daily during the morning and afternoon peak travel periods and when traffic accidents, vehicle breakdowns, or bridge lifts occur. Due to excess travel demand and congestion in the I-5 bridge corridor, many trips take the longer, alternative I-205 route across the river. Spillover traffic from I-5 onto parallel arterials such as Martin Luther King Jr. Boulevard and Interstate Avenue increases local congestion. In 2005, the two crossings carried 280,000 vehicle trips across the Columbia River daily. Daily traffic demand over the I-5 crossing is projected to increase by more than 35 percent during the next 20 years, with stop-and-go conditions increasing to approximately 15 hours daily if no improvements are made.

The transportation data included in this section are explained in detail in Chapter 3, and in greater detail in the CRC Traffic Technical Report and CRC Transit Technical Report.

Vehicle Trips

Of the 280,000 vehicle trips that crossed the Columbia River daily in 2005, 134,000 vehicles utilized the I-5 Interstate bridges while 146,000 used I-205. The figure includes trips made in single-occupancy vehicles (SOV), high-occupancy vehicles (HOV), trucks, and transit vehicles (buses).

PROJECT PURPOSE AND NEED • 1-5

Columbia River Crossing, FEIS, Chapter 1: Purpose and Need. https://www.wsdot.wa.gov/accountability/ssb5806/docs/6_Project_Development/Environmental_Process_And_Permitting/FEIS_PDFs/CRC_FEIS_Chapter_1.pdf

8.5 When the project was revived as the "Interstate Bridge Replacement" project in 2019, the Federal Highway Administration and Federal Transit Administration re-adopted the same Purpose and Need Statement as used in the Columbia River Crossing.

> In 2019, ODOT and WSDOT reinitiated the CRC Project as the IBR Program. The needs identified in the CRC Purpose and Need statement are still pertinent to the IBR Program. As a result, the Purpose and Need statement for the IBR Program remains the same as in the CRC Project's 2011 Final EIS and ROD.
>
> Supplemental Environmental Impact Statement for the Interstate Bridge Replacement Program, A Notice by the Federal Highway Administration and the Federal Transit Administration on 04/05/2023, Federal Register, 88 FR 20206
>
> https://www.federalregister.gov/documents/2023/04/05/2023-07052/supplemental-environmental-impact-statement-for-the-interstate-bridge-replacement-program

The IBR stated in its -re-evaluation:

> Through work completed over the past year, the IBR program has determined that the needs identified in the CRC Purpose and Need statement are still pertinent. Thus,

> the Purpose and Need statement for the IBR program remains the same as in the 2011 ROD for the CRC Project.
>
> MEMORANDUM: CONTEXT FOR NATIONAL ENVIRONMENTAL POLICY ACT (NEPA) REEVALUATION Feb. 4, 2022
>
> https://www.interstatebridge.org/media/uhollzy5/2021-12-29-ibr-reevaluation-final-version-signed_unremediated.pdf

As the IBR website makes clear, the Purpose and Need is unchanged:

> Project Need: The specific needs to be addressed by the proposed action include:
>
> - Growing travel demand and congestion: Existing travel demand exceeds capacity in the I5 Columbia River crossing and associated interchanges. This corridor experiences heavy congestion and delay lasting 4 to 6 hours daily during the morning and afternoon peak travel periods and when traffic accidents, vehicle breakdowns, or bridge lifts occur. Due to excess travel demand and congestion in the I-5 bridge corridor, many trips take the longer, alternative I-205 route across the river. Spillover traffic from I-5 onto parallel arterials such as Martin Luther King Jr. Boulevard and Interstate Avenue increases local congestion. In 2005, the I-5 and I-205 crossings carried 280,000 vehicle trips across the Columbia River daily. Daily traffic demand over the I-5 crossing is projected to increase by more than 35 percent during the next 20 years, with stop-and-go conditions increasing to approximately 15 hours daily if no improvements are made.
> - Impaired freight movement: I-5 is part of the National Truck Network, and the most important freight highway on the West Coast, linking international, national and regional markets in Canada, Mexico and the Pacific Rim with destinations throughout the western United States. In the center of the project area, I-5 intersects with the Columbia River's deep water shipping and barging as well as two river-level, transcontinental rail lines. The I-5 crossing provides direct and important highway connections to the Port of Vancouver and Port of Portland facilities located on the Columbia River as well as the majority of the area's freight consolidation facilities and distribution terminals. Freight volumes moved by truck to and from the area are projected to more than double over the next 25 years. Vehicle-hours of delay on truck routes in the Portland-Vancouver area are projected to increase by more than 90 percent over the next 20 years. Growing demand and congestion will result in increasing delay, costs and uncertainty for all businesses that rely on this corridor for freight movement.

Re-Evaluation of the Interstate-5 Columbia River Crossing Final Environmental Impact Statement and Record of Decision (2011; re-evaluated in 2012 and 2013) December 2021 Interstate Bridge Replacement Program | Page B-2

The statement of Purpose and Need as restated by IBR reads as follows.

Interstate BRIDGE Replacement Program

Re-Evaluation of the Interstate-5 Columbia River Crossing Final Environmental Impact Statement and Record of Decision (2011; re-evaluated in 2012 and 2013)

ATTACHMENT B. COLUMBIA RIVER CROSSING PROJECT PURPOSE AND NEED

Excerpted from the CRC Project Record of Decision (2011).

Project Purpose

The purpose of the proposed action is to improve I-5 corridor mobility by addressing present and future travel demand and mobility needs in the CRC Bridge Influence Area (BIA). The BIA extends from approximately Columbia Boulevard in the south to SR 500 in the north. Relative to the No-Build Alternative, the proposed action is intended to achieve the following objectives: a) improve travel safety and traffic operations on the I-5 crossing's bridges and associated interchanges; b) improve connectivity, reliability, travel times, and operations of public transportation modal alternatives in the BIA; c) improve highway freight mobility and address interstate travel and commerce needs in the BIA; and d) improve the I-5 river crossing's structural integrity (seismic stability).

Project Need

The specific needs to be addressed by the proposed action include:

- **Growing travel demand and congestion**: Existing travel demand exceeds capacity in the I5 Columbia River crossing and associated interchanges. This corridor experiences heavy congestion and delay lasting 4 to 6 hours daily during the morning and afternoon peak travel periods and when traffic accidents, vehicle breakdowns, or bridge lifts occur. Due to excess travel demand and congestion in the I-5 bridge corridor, many trips take the longer, alternative I-205 route across the river. Spillover traffic from I-5 onto parallel arterials such as Martin Luther King Jr. Boulevard and Interstate Avenue increases local congestion. In 2005, the I-5 and I-205 crossings carried 280,000 vehicle trips across the Columbia River daily. Daily traffic demand over the I-5 crossing is projected to increase by more than 35 percent during the next 20 years, with stop-and-go conditions increasing to approximately 15 hours daily if no improvements are made.

8.6 The IBR purpose and need statement relies critically on traffic projections. In each case, the central element of the purpose and need statement was projections of future traffic growth in the I-5 corridor.

8.7 The traffic projections used to produce the IBR purpose and need statement are outdated and wrong. The original purpose and need statement relied on a twenty-year

forecast of traffic growth made in 2005. We are now nearly 90 percent of the way through that forecast period, and it is readily apparent that the transportation projection incorporated into the purpose and need statement was demonstrably false. Rather than growing at a rate of 1.7 percent per year as forecast in the 2005 Purpose and Need Statement, or 1.5 percent per year as forecast in the 2011 Purpose and Need Statement, travel has grown at a much lower rate 0.3 percent per year from 2005 through 2019.

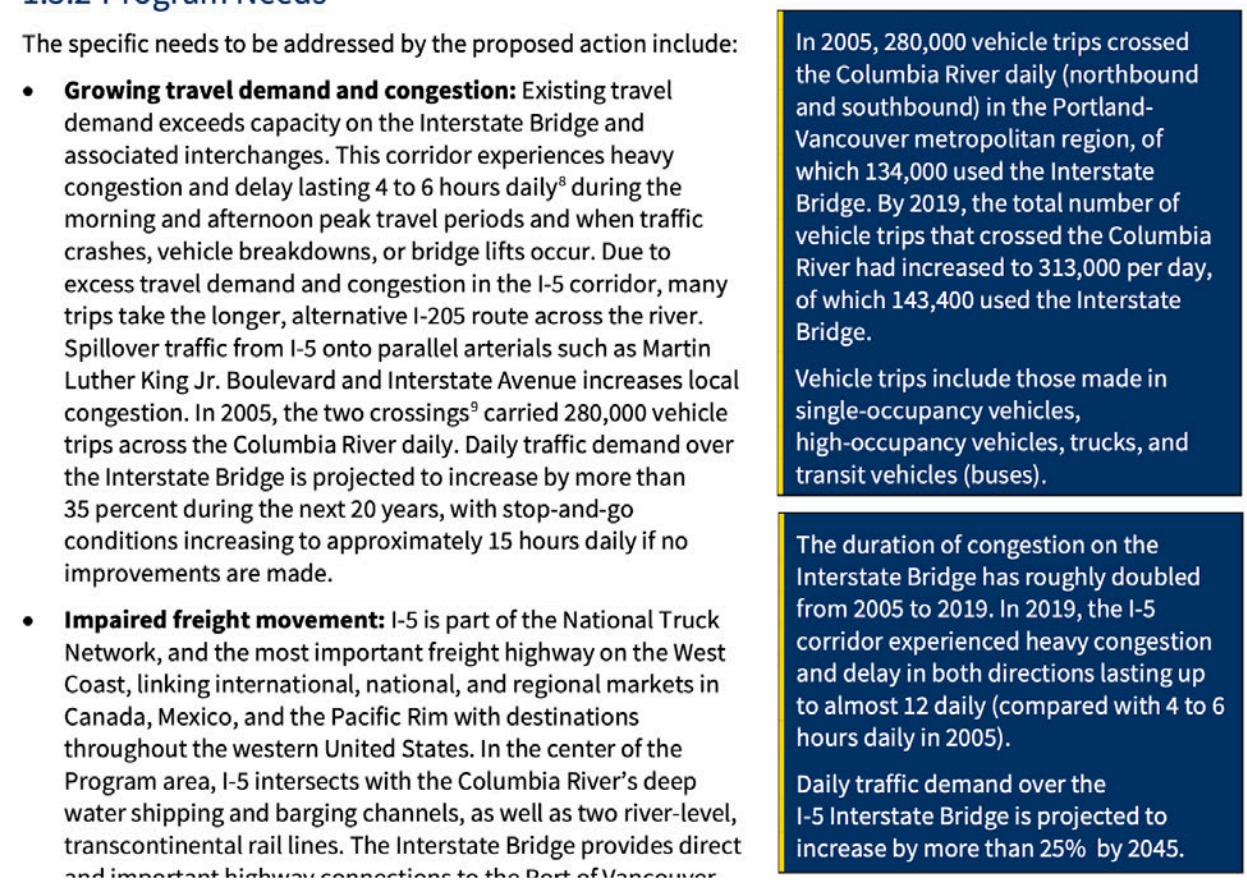
Traffic Growth Rates in Purpose and Need Statements

Forecast	Period	Base	Future	AAGR
CRC Purpose & Need (2005)	20 years	n.a.(*)	n.a.(*)	1.7%
CRC Purpose & Need (2008)	20 years	n.a.(**)	n.a.(**)	1.5%
Final Environmental Impact Statement (2011)	2005-2030	134,000	184,000	1.3%
Investment Grade Analysis (2013)	2019-2045	128,400	138,200	0.3%
IBR Re-evaluated Purpose and Need (2022)	20 years	n.a.(**)	n.a.(**)	1.5%
Metro Travel Demand Model (2022)	2019-2045	164,050	190,922	0.6%
IBR Post-Processed (2022)	2019-2045	143,400	176,000	0.8%
Stantec Level 2 Study (2023)	2019-2045	143,400	182,300	0.9%
Actual	2005-2019	132,603	138,530	0.3%

*-"... more than 40 percent in the next twenty years..."
*-"... more than 35 percent in the next twenty years..."

None of the traffic modeling done for the IBR project indicates that traffic growth will be anywhere near as fast as claimed in the project's purpose and need statement. The Metro Travel Demand Model predicts a growth rate of 0.6 percent per year, the IBR's "post-processed" data predict growth of 0.8 percent per year, and the Stantec Level 2 study predicts growth of 0.9 percent per year. All of these data sources imply that the traffic growth rates assumed in the Purpose and Need Statement are at least 50 percent too high. Additionally, as noted, none of these three forecasts properly allows for peak hour capacity constraints on the existing I-5 bridge which greatly limit future traffic growth (See Section 4).

8.8 The Draft Supplemental Environmental Impact Statement contains contradictory claims about traffic growth rates. The text of the adopted Purpose and Need Statement claims daily traffic demand will increase by more than 35 percent over the next 20 years; the text box adjacent to the statement says: daily traffic demand is expected to increase more than 25 percent by 2045.



1.3.2 Program Needs

The specific needs to be addressed by the proposed action include:

- **Growing travel demand and congestion:** Existing travel demand exceeds capacity on the Interstate Bridge and associated interchanges. This corridor experiences heavy congestion and delay lasting 4 to 6 hours daily[8] during the morning and afternoon peak travel periods and when traffic crashes, vehicle breakdowns, or bridge lifts occur. Due to excess travel demand and congestion in the I-5 corridor, many trips take the longer, alternative I-205 route across the river. Spillover traffic from I-5 onto parallel arterials such as Martin Luther King Jr. Boulevard and Interstate Avenue increases local congestion. In 2005, the two crossings[9] carried 280,000 vehicle trips across the Columbia River daily. Daily traffic demand over the Interstate Bridge is projected to increase by more than 35 percent during the next 20 years, with stop-and-go conditions increasing to approximately 15 hours daily if no improvements are made.
- **Impaired freight movement:** I-5 is part of the National Truck Network, and the most important freight highway on the West Coast, linking international, national, and regional markets in Canada, Mexico, and the Pacific Rim with destinations throughout the western United States. In the center of the Program area, I-5 intersects with the Columbia River's deep water shipping and barging channels, as well as two river-level, transcontinental rail lines. The Interstate Bridge provides direct and important highway connections to the Port of Vancouver

In 2005, 280,000 vehicle trips crossed the Columbia River daily (northbound and southbound) in the Portland-Vancouver metropolitan region, of which 134,000 used the Interstate Bridge. By 2019, the total number of vehicle trips that crossed the Columbia River had increased to 313,000 per day, of which 143,400 used the Interstate Bridge.

Vehicle trips include those made in single-occupancy vehicles, high-occupancy vehicles, trucks, and transit vehicles (buses).

The duration of congestion on the Interstate Bridge has roughly doubled from 2005 to 2019. In 2019, the I-5 corridor experienced heavy congestion and delay in both directions lasting up to almost 12 daily (compared with 4 to 6 hours daily in 2005).

Daily traffic demand over the I-5 Interstate Bridge is projected to increase by more than 25% by 2045.

8.9 The purpose and need of the project is too narrowly defined. By defining the "need" for this project to accommodate a growth rate of about 1.5 percent per year, which is well in excess of observed and predicted future traffic growth, the IBR has effectively eliminated from consideration smaller and less environmentally damaging alternatives (for example, a narrower bridge that utilizing existing intersections and approaches). In effect, the Purpose and Need Statement purports to define a "need" to accommodate 35 percent more vehicles in twenty years, when in fact, we won't need to accommodate that many. This excessively narrow purpose and need statement excludes other reasonable alternatives from consideration, as required by NEPA:

> It is contrary to NEPA for agencies to "contrive a purpose so slender as to define competing `reasonable alternatives' out of consideration (and even out of existence)." *Simmons* v. *U.S. Army Corps of Engineers,* 120 F.3d 664, 666 (7th Cir. 1997) (citing 42 U.S.C. 4332(2)(E)). Constricting the definition of the project's purpose could exclude "truly" reasonable alternatives, making an EIS incompatible with NEPA's requirements. *Id. See also, e.g., Nat'l Parks & Conservation Ass'n* v. *Bureau of Land Mgmt.,* 606 F.3d 1058, 1070 (9th Cir. 2010) ("Agencies enjoy `considerable

discretion' to define the purpose and need of a project. However, `an agency cannot define its objectives in unreasonably narrow terms.'" (internal citations omitted)).

9. By using flawed traffic projections, IBR has failed to accurately reveal the project's environmental effects.

IBR maintains that the Level 2 analysis cannot be used to assess the environmental effects of the IBR project under NEPA. In fact, ODOT, one of the partners in the IBR project, has used its Level 2 forecast of traffic on I-205 in the Portland Metropolitan Area for the environmental assessment of the I-205 project. The Level 2 forecasts are more accurate than Level 1, and show different environmental effects more precisely.

- *Level 2-3 analyses are more rigorous and accurate*
- *Level 2-3 analysis use the same modeling tools and framework*
- *Level 2-3 analyses conducted for IBR are better calibrated, and have fewer errors than Level 1*
- *ODOT has failed to justify the excessively optimistic and error filled predictions of its Level 1 analysis.*
- *Level 3 analyses are not unrealistically conservative, traffic routinely falls below levels predicted in*
- *Level 3 is not a "worst case" analysis.*
- *ODOT has used level 3 analyses for NEPA purposes for other Portland area highway projects*

The traffic modeling in the Stantec Level 2 analysis and the SEIS analysis are functionally identical: they aim to estimate the pattern of traffic in the Portland metropolitan area. Contrary to IBR claims:

- Level 2 and Level 3 analyses are not unrealistically low or worst case estimates of traffic
- Level 2 and Level 3 analyses demonstrate dramatically different environmental impacts as a result of tolling.
- ODOT used its level 2 analysis of I-205 for preparation of the environmental assessment of I-205.

9.1 IBR falsely claims that Level 2 traffic forecasts cannot be used to assess environmental impacts. IBR officials claim that the Level 2 and EIS studies are done "for different purposes."

Traffic Forecasts for Different Purposes

There are two different types of traffic volume forecasts being prepared for use on the IBR Program: Financial Planning Forecasts and Environmental Analysis Forecasts.

These forecasts have inherently different purposes. Forecasts for financial planning, such as a toll traffic and revenue (T&R) studies, focus on annual traffic and revenue projections in each year. Typically, these forecasts are conservative so as to not overstate possible revenue.

Forecasts for environmental analysis are prepared to support the National Environmental Policy Act (NEPA) process and focus on traffic impacts for a typical weekday. Generally, these forecasts are intended to avoid underestimating possible environmental impacts and are used for design needs.

https://www.interstatebridge.org/media/jn0njjgt/231101_ibr_tr_factsheet_remediated.pdf

9.2 Level 2 and Level 3 forecasts are more accurate than the "Level 1" forecasts IBR uses in the SDEIS. ODOT officials portray Level 2 and Level 3 analyses as more refined and precise estimates of travel demand than their "Level 1" forecast. Specifically they represent the Level 2 and Level 3 estimates as more "rigorous and precise." Each successive level of forecasting is represented as having an "increased level of accuracy."

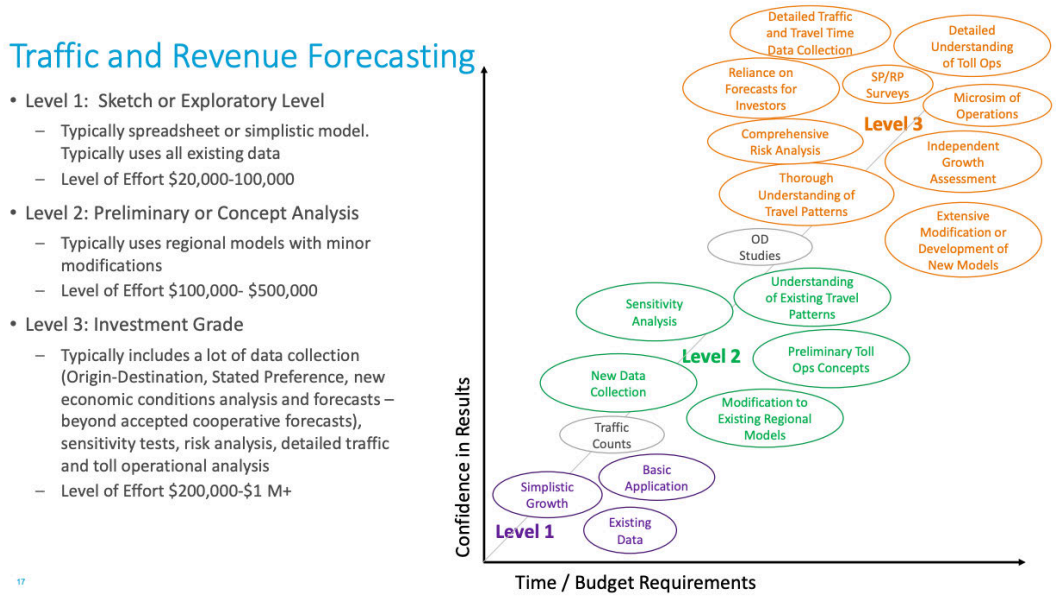
There are three levels of T&R studies, typically performed sequentially and each building upon the previous one to inform the decision-making process. Level 1 is a basic sketch analysis for evaluating high-level feasibility of tolling. This level of analysis was completed during previous bridge replacement planning efforts.

Level 2 includes more detailed analysis conducted to test different toll and policy scenarios to determine their relative traffic and revenue outcomes to inform ongoing financial planning.

This is the level of analysis recently conducted by the Program. A Level 2 toll T&R study is typically conducted concurrent with environmental analysis required by NEPA.

A Level 3 toll T&R study (also referred to as an "investment-grade" study) is the most-detailed level, focused on supporting decision-makers to refine toll rates and policies into the set that are projected to meet project objectives, including all financial obligations. The Level 3 forecasts are prepared with sufficient precision and rigor to secure a credit rating and obtain financing and are typically completed about 6 to 8 months before tolling begins.

An independent review of traffic and revenue forecasting prepared by the Stephen Weller, Travel Demand Forecasting Lead, CH2M, for the Larson Institute of the University of Pennsylvania described Level 3 analyses as the most well-researched and having the greatest "confidence in results" of all three levels of traffic estimates.



Weller, Stephen, "Public Perspective on Traffic and Revenue Forecasts for Public/Private Partnerships," Presentation to the Penn State Transportation and Safety Conference, December 7, 2017
https://www.larson.psu.edu/education/TESC-Sessions/5B-Innovative-Planning-Procurement-Freeway-Congestion-LTI.aspx

Level 2 and Level 3 analyses are more detailed and reliable than Level 1 analyses. According to the Federal Highway Administration,

> Study levels are typically termed I, II, or III, with Level I being conceptual and based on available information. Level II requires current and comprehensive survey data and a full analysis, while Level III is investment grade with the toll plan and other pertinent factors and assumptions detailed with full support, necessary commitments from others when appropriate, and complete documentation.
> Federal Highway Administration, Guidebook On Financing Of Highway Public-Private Partnership Projects, December 2016
> https://www.fhwa.dot.gov/ipd/p3/toolkit/publications/other_guides/financing_of_highway_p3_projects/appendices.aspx

9.3 Level 2 and Level 3 forecasts are neither excessively conservative nor pessimistic.

Level 2 and Level 3 forecasts are not inordinately pessimistic, rather, it is that level 1 forecasts are unjustifiably optimistic. The Transportation Research Board writes:

> Forecasts prepared by project sponsors and bidders (interested parties) are generally higher than prepared by investors/bankers; this optimism bias is estimated at 20% or more.
>
> Transportation Research Board, NCHRP 722, Assessing Highway Tolling and Pricing Options and Impacts: Volume 2: Travel Demand Forecasting Tools, page 30.

9.4 ODOT uses Level 2 forecasts for environmental analysis.

ODOT has relied on "Level 2" Forecasts to document environmental impacts under NEPA for other Portland Area highway expansion projects. ODOT contractor WSP prepared a "Level 2" analysis for the I-205 project in November 2022. That analysis contains traffic and revenue estimates for I-205.

ODOT incorporated WSP's Level 2 traffic estimates in the Transportation Technical Report for the I-205 Environmental Assessment. It shows on Figure 5.7 on page 3 of the I-205 Traffic Technical Report that average daily volumes across the Tualatin River Bridge in the Build Scenario in 2045 would be 101,700. The transportation technical report narrative confirms that ODOT used the same numbers for **both** the financial analysis and the environmental analysis of the project.

> For environmental analysis and financial planning purposes, a baseline weekday variable-rate toll schedule was identified that balances the objectives of revenue generation sufficient to meet the funding target for capital construction of the I-205 improvements, and alleviating congestion on I-205 during peak travel times.
> . . .
> A recent financial analysis confirmed that under the assumed baseline toll rates, there would be sufficient net toll revenues to leverage bonds that would meet the toll funding contribution target for construction of the planned I-205 improvements.
> I-205_Transportation_Technical Report_FinalDraft.doc
> WSP, I-205 Transportation Technical Report, November 2022, page 7.

ODOT also used these same Level 2 traffic projections in the I-205 Benefit-Cost Analysis it submitted to the federal government. In applying for federal funds for this project, ODOT is legally obligated to demonstrate that a project is cost-effective, i.e. produces economic benefits in excess of its cost. ODOT represented these Level 2 projections as factual and accurate indications of future travel levels if the project is built. They are manifestly saying the Level 2 projections can be used to assess the environmental and socio-economic impacts of this project. They particularly make the point that tolling reduces and re-directs traffic, and that this is essential to estimating project benefits and costs.

In its Benefit Cost Narrative for the I-205 project, ODOT notes:

> Demand management through **tolling significantly improves congestion outcomes** . . . Value of Travel Time savings, or Vehicle Hours of Driving (VHD) benefits are calculated from traffic studies on pre-pandemic traffic levels and modeled traffic volumes **under the addition of tolling**. These traffic figures are provided by WSP USA and their Transportation Engineering team. Volume growth under the baseline is limited by congestion and lack of additional lanes, while **volume growth under the Build scenario sees slower growth over time due to the ability of tolling to manage demand.**
> ODOT, I-205 Benefit Cost Analysis Narrative, 2022 (Emphasis supplied)

In its Benefit Cost Analysis for the I-205 project, ODOT relied on the Level 2 forecast produced by WSP to predict traffic levels and benefits (reductions in vehicle hours of delay).

> VHD reduction factors: VHD reduction is based on traffic volumes and time savings per trip estimates from WSD USA, and can be found in the tables in the "Modeled Travel Times" and "Traffic Count Data" worksheets of the BCA model. These estimates are developed relative to a No Build Baseline, with No Build volumes reported in the "Traffic Count Data" as well. Travel time savings are calculated relative to the No Build baseline, and total travel times can be seen in the top table in the Modeled Travel Times worksheet. Truck share of traffic for Northbound and Southbound lanes can be found in the table starting in cell C20 of the "Modeled Travel Times" worksheet. The worksheet "VHD Savings" calculates the benefits from travel time savings.
>
> Oregon Department of Transportation, I-205 Corridor Widening: Stafford Road to OR43 Benefit Cost Analysis Description, Assumptions, and Factors
> https://www.oregon.gov/odot/About/INFRAI205/I-205%20Corridor%20BCA%20-%20INFRA%202022%20FINAL.pdf

The project's benefit cost excel spreadsheet shows that the benefit cost analysis used exactly the same traffic projections as the Level 2 study, and the Transportation Technical Report of the Environmental Assessment.

In addition, in the case of the I-205 project, ODOT relies on the Level 2 modeling to show that the addition of highway capacity will not result in induced demand (additional travel) because tolling will limit the growth of traffic. Limiting the growth of traffic is central to the EA conclusion that the project will not have adverse environmental impacts.

> Methodology: Value of Travel Time Savings and Congestion Reduction Value of Travel Time savings, or Vehicle Hours of Driving (VHD) benefits are calculated from traffic studies on pre-pandemic traffic levels and modeled traffic volumes under the addition of tolling. These traffic figures are provided by WSP USA and their Transportation Engineering team. Volume growth under the baseline is limited by congestion and lack of additional lanes, while volume growth under the Build scenario sees slower growth over time due to the ability of tolling to manage demand. Volumes and travel times are reduced under the Build scenario relative to baseline. . . . **Induced travel: Induced travel is likely to be zero due to the implementation of tolling and demand management pricing**. This can be seen in the change in traffic volumes assumed in worksheet "Traffic Count Data." The source of this data is modeling done by WSD [sic]USA transportation engineers.
> Oregon Department of Transportation, I-205 Corridor Widening: Stafford Road to OR43 Benefit Cost Analysis Description, Assumptions, and Factors https://www.oregon.gov/odot/About/INFRAI205/I-205%20Corridor%20BCA%20-%20INFRA%202022%20FINAL.pdfSCRAP (Emphasis added)

9.5 The failure to use more recent, accurate forecasts of traffic violates NEPA. In one relevant case, court's found USDOT violated the law by failing to use newer, more accurate forecasts when they were available.

> . . . [w]hile NEPA does not require an agency to update its population forecasts whenever new forecasts become available, it ordinarily may not rely on outdated forecasts when it sets out to prepare an EIS even though more recent forecasts from the agency's own experts are readily available. Defendants' decision to do so here was error....Defendants cannot rely on the fact that they discussed the issue in the [post-FEIS] traffic sensitivity analysis] to excuse their failure to directly address it in the FEIS because the TSA was not subject to public comment.
> *Conservation Law Found. v. Fed. Highway Admin.,* 2007 WL 2492737, at *22 (D.N.H. August 30, 2007)

Both the Level 2 (e.g Stantec) and Level 3 (CDM Smith) analyses are more reliable in predicting actual levels of traffic under tolling. It is a violation of NEPA to use less accurate, less valid information, when better information is available.

Tolling is integral to understanding the traffic and environmental impacts of the project. The level of tolls determines the amount of traffic.

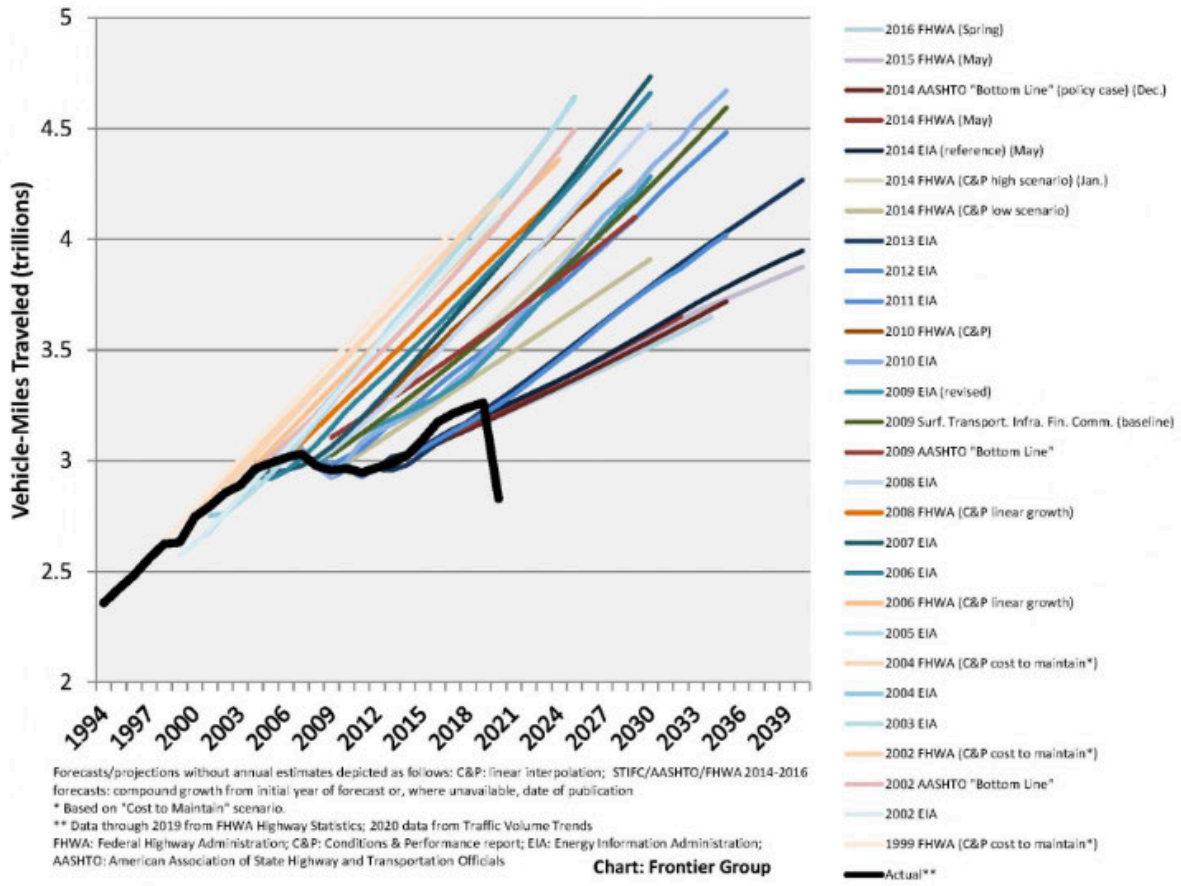
In the case of the Columbia River Crossing, the level of tolls ultimately recommended for the project was substantially higher, and had very different traffic and environmental impacts than those presented in the less accurate "Level 1" forecasts used to prepare the 2011 Environmental Impact Statement. The financial analysis done as part of the Investment Grade Analysis concluded that tolls needed to be as much as twice as high to pay for the project (minimum tolls of $2.60, rather than $1.35), and this produced considerable diversion of traffic to I-205 not predicted in the Investment Grade Analysis.

9.6 Investment Grade Forecasts are not "worst case" estimates

The Oregon and Washington Departments of Transportation and staff of the IBR have claimed that the investment grade analyses are financial "worst case" scenarios that will never be borne out in practice. That's simply false. The federal government and bond rating agencies require the preparation of independent, investment grade forecasts because state highway department forecasts are unreliable and are generally dramatic over-estimates. Investment grade forecasts are more realistic, but also tend to be over-optimistic; they are not described by their authors as "worst-case" scenarios; traffic levels regularly come in below levels forecast by investment grade analyses.

First, to be sure, highway department forecasts routinely overstate future traffic growth. A comprehensive review of two decades of traffic growth projections prepared by state transportation departments, the Federal Highway Administration and other groups, like AASHTO (the highway agency lobby), shows that they continually predict "hockey-stick" growth patterns that have never been realized in practice.

Predicted Versus Actual VMT Growth (Dutzik 2021)



Dutzik, 2021.

While investment grade analyses are not as egregiously over-optimistic as these highway department "hockey-stick" forecasts, they also tend to consistently over-estimate actual traffic levels. The problem of over-estimating traffic levels (and associated toll revenues) is endemic. Bond rating agency Fitch issued a scathing report on toll forecast errors. They warned that over-estimating revenue is common in the industry and is a key cause of financial problems for toll-financed projects. The Fitch message, summarized in the trade publication, Toll Roads News, is clear and stark:

> They [Fitch] call demand forecasting "a key vulnerability," adding: "The probability of over-estimation remains high despite decades of experience with forecasting demand on transport projects. Many greenfield projects over the years across many jurisdictions have suffered from this… While other risks have been manifested in

> many cases, defaults on debt have largely been driven by under-performance relative to original projections."
> (emphasis added)
> Toll Road News, "Global PPP Lessons Learned," Toll Roads News, October 7, 2013
> http://www.tollroadsnews.com/node/6769

Investment grade forecasts also routinely suffer from optimism bias, as demonstrated by international expert (and Oregon State Treasury adviser) Robert Bain's comprehensive review of industry practice:

> "The standard of some traffic and revenue studies, supporting infrastructure investments worth billions of dollars, is truly appalling," Bain said. "Forecasts are commonly used to 'sell' deals to potential investors, insurers or rating agencies — so they are exposed to manipulation."
> Bain, quoted in Pittman, 2016

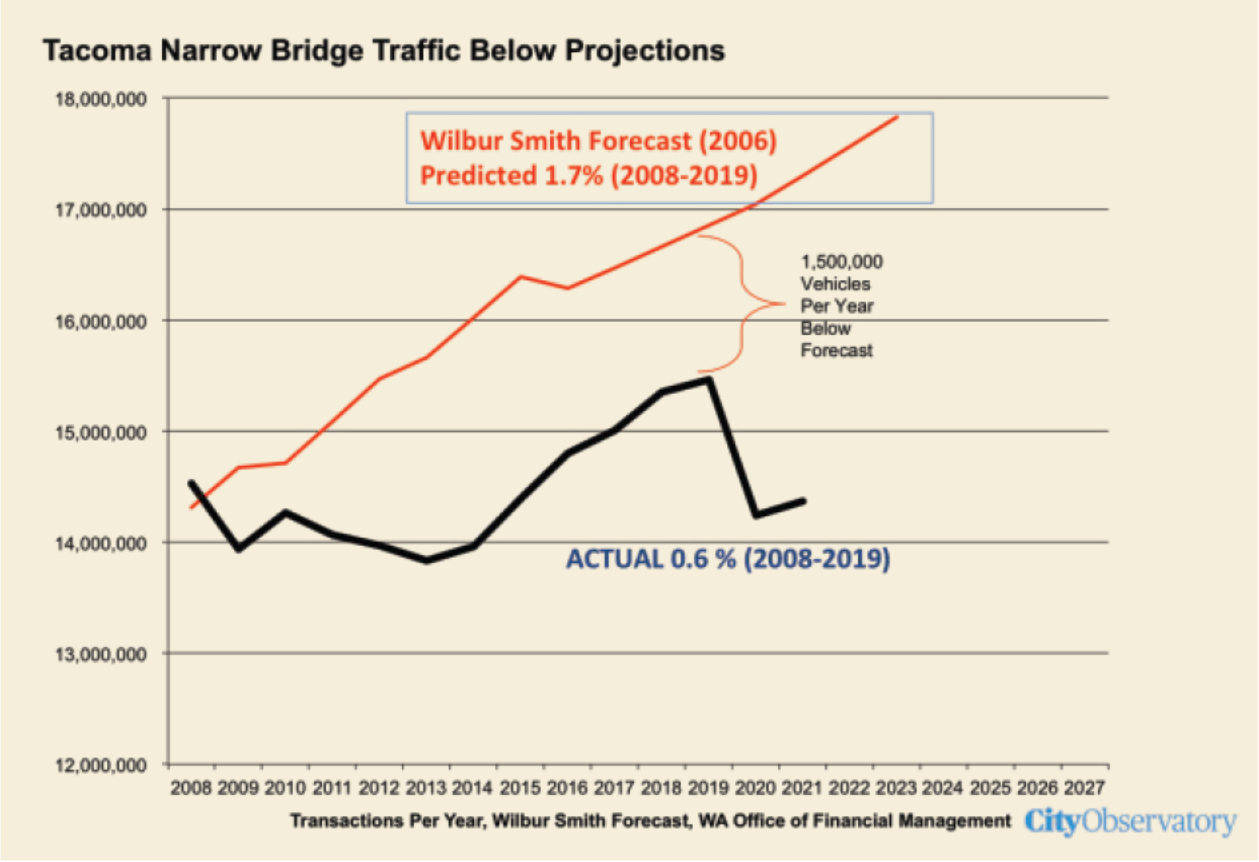
Over-predicting traffic is commonplace for toll road studies, even those done for "investment grade" forecasts. Streetsblog reported that:

> In 2012, the Reston (Virginia) Citizens Association completed a study [PDF] examining traffic projections provided by engineering firm Wilbur Smith (the company that did the very wrong Indiana Toll Road projections, now called CDM Smith). The group collected data from 26 toll road projects on which Wilbur Smith had produced the traffic projections. During the first five years that were forecast, traffic projections overshot actual traffic every single year, and by an average of 109 percent, according to the report.

In short, investment grade toll revenue forecasts are not as excessively optimistic as the promotional forecasts produced by state highway agencies, but they still consistently over-estimate traffic volumes and toll revenues on newly tolled-roadways. They are decidedly not unrealistic worst-case scenarios as portrayed by state DOT and IBR officials. As a practical matter, the results of the Investment Grade Analyses confirm that overall traffic levels will be lower, and diversion to un-tolled parallel routes (in this case I-205) will be higher than acknowledged in IBR's less rigorous "Level 1" forecasts that are used in its environmental analysis. That will lead to vastly different community, environmental and economic impacts than portrayed in the project's environmental impact statement.

9.7 Investment Grade Analyses of tolled highway facilities do not tend to under-estimate future traffic levels; if anything, investment grade traffic and revenue studies tend to over-state future traffic levels. The criticism that investment grade studies are "too conservative" implies that such studies routinely under-estimate traffic levels on tolled roads (i.e. that actual traffic levels are significantly higher than shown in the investment grade analysis). While the IBR asserts that this is true, they present no actual statistical evidence to show that investment grade studies under estimate traffic. In fact, studies that have been done show that actual traffic levels on tolled facilities are lower than forecast.

One need look no further than the Tacoma Narrows Bridge in Washington State, the nearest highway project that has been subjected to an investment grade forecast. Wilbur Smith (the predecessor of CDM Smith) prepared the investment grade forecast for the Tacoma Narrows Bridge.



It predicted that traffic on the bridge would grow at an annual rate of 1.7 percent per year after the capacity of the bridge was doubled. In fact, through 2019 (i.e. prior to the pandemic) actual traffic growth was only about a third that fast (traffic up 0.6 percent). The

result is that toll revenues are dramatically lower than projections, necessitating repeated bail outs from state highway funds.

9.8 Higher forecasts are not environmentally more conservative. State DOT officials try to rationalize the exaggerated Level 1 forecasts as helping to minimize the environmental effects of the project. In essence, they imply that build traffic levels will be "no worse"--i.e. Not higher than shown in the Level 1 forecast. This is wrong for two reasons. First, as noted above, the environmental impact of the project is determined by comparing the build forecast against the no-build, and the traffic models overstate the no-build forecasts by an even larger amount (and thus falsely claim that the project will have less environmental impact). Second, tolling produces diversion, which has its own environmental effects. Failing to appropriately model the effects of tolling on patterns of traffic--in this case the diversion of tens of thousands of vehicles from I-5 to I-205, according to the project's own Level 2 study.

The IBR SDEIS claims that tolling the expanded I-5 bridge will produce no net shift of traffic from I-5 to I-205. According to the SDEIS, traffic in the "No-build" scenario on I-205 would be 220,000 vehicles per average weekday in 2045, and if I-5 were tolled, traffic on I-205 for the average weekday would be 214,000 vehicles, a decrease of 6,000 vehicles. This is an obviously implausible result: IBR argues fewer vehicles will use I-205 bridge if the alternative route (I-5) is tolled than if the I-5 route is free.

Transportation Technical Report

Interstate BRIDGE Replacement Program

Table 4-56. 2045 Forecast Average Weekday Daily Traffic and Transit Volumes and Total Person-Trips for Vehicles and Transit Only

Location	2045 No-Build AWDT	2045 No-Build Transit Trips	2045 No-Build Total Person-Trips	2045 Modified LPA and Options AWDT [a]	2045 Modified LPA and Options Transit Trips [a]	2045 Modified LPA and Options Total Person-Trips [a]
Total River Crossing	400,000	17,200	523,200	389,000 (-3%)	30,800 (+79%)	522,600 (-.1%)
I-5 Bridge	180,000	14,800	241,500	175,000 (-3%)	29,100 (+96%)	249,400 (+3%)
I-205 Bridge	220,000	2,400	281,600	214,000 (-3%)	1,800 (-25%)	273,100 (-3%)

Source: ODOT/WSDOT, Metro/RTC Regional Travel Demand Model, IBR Analysis

a Percentages reflect change from 2045 No-Build Alternative.

AWDT = average weekday daily traffic

That estimate is flatly contradicted by the Stantec Level 2 study, which argues conclusively that tolling I-5 will cause tens of thousands of vehicles to divert to the I-205 bridge. The Stantec study estimates that tolling I-5 would cause more than 50,000 fewer vehicles to use the I-5 bridges, and that between 42,000 and 51,000 of these vehicles would shift to the I-205 bridge.

Table 4-4. River Crossings by Bridge

Year	I-5	I-205	Total	I-5	I-205
No-Build	182,300	216,100	398,400	46%	54%
Scenario A	124,000	258,100	382,100	32%	68%
Scenario B	130,600	257,300	387,900	34%	66%

Note: All traffic forecasts are intended to support financial analysis only; not intended for design purposes.

Stantec, Interstate Bridge Replacement Project, Level 2 Traffic and Revenue Study, February 24, 2023, page 4-10

While IBR and its paid consultant, Stantec, may assert that these forecasts are "not intended" for design purposes, one can logically ask, "whose intent, and why?" It's clear that the highway departments, who want to justify as large a project as possible, and conceal its potential negative traffic and environmental effects don't like the implications of these forecasts. Also, as noted above, the Stantec model has a far smaller error factor (2.5 percent) than the Metro "Kate" model (14 percent) , on which the IBR SDEIS estimates are based.

9.9 It is accurate for highway departments to say that investment grade analyses produced by consultants generate more conservative results than the forecasts produced by state highway departments. But that begs the larger question: why should anyone place any reliance on the grossly exaggerated projections of state highway departments? There's no rational basis for preferring exaggerated promotional forecasts to more conservative ones for the purpose of estimating the environmental impacts of the project.

10. IBR modeling is inconsistent with adopted state and regional climate plans and policies

The Interstate Bridge Project is based on projections that call for accommodating a 26-27 percent increase in vehicle miles traveled; this is inconsistent with adopted Metro and Oregon

policies that call for holding vehicle miles of travel to their current level. IBR modeling, which assumes this large increase in driving violates the provisions of the federally-required, regionally adopted Regional Transportation Plan which calls for holding vehicle miles traveled to approximately their current level through 2045.

10.1 Oregon and Metro have adopted climate plans and policies calling for a significant reduction in greenhouse gas emissions. Metro has adopted a Climate Smart Strategy which calls for a reduction in greenhouse gasses by 75 percent. Metro and the State have determined that achieving this greenhouse gas reduction goal will require—in addition to expected improvements in vehicle technology— holding the overall level of vehicle miles traveled in the region to about their current level for the next two decades.

10.2 The Land Conservation and Development Commission's Climate Friendly and Equitable Communities (CFEC) Rule requires Metro to plan for a 35 percent reduction in vehicle miles traveled per capita between 2005 and 2050. Oregon Law (ORS 468A.205) calls for Oregon to reduce its greenhouse gas emissions to 25% of 1990 levels by 2050. The Land Conservation and Development Condition has adopted rules (OAR 660-044) that:

- Declare the purpose of Division 44 is to implement ORS 468A.205.

- Require Metro to "change its transportation and land use plans to significantly reduce pollution from light vehicles" and to change its policies accordingly.

- Set emissions reductions targets that Metro is required to use when it "develops, reviews and updates a land use and transportation scenario" "while achieving" greenhouse gas emission reductions by reducing per capita vehicle miles traveled by 20 percent by 2034 and 35 percent by 2050.

Metro is required to adopt a Regional Transportation Plan ("RTP") in which Vehicle Miles Traveled ("VMT") declines by 30 percent from 2005 levels by 2045. OAR 660-012-0160(6) provides:

> Metro **shall** adopt a regional transportation plan in which the projected vehicle miles traveled per capita at the horizon year using the financially-constrained project list **is lower than** the estimated vehicle miles traveled per capita at the base year by an amount that is consistent with the metropolitan greenhouse gas reduction targets in OAR 660-044-0020. [emphasis added]

10.3 Metro's climate plans are required to be incorporated in the adopted, federally required Regional Transportation Plan. Metro adopted the latest version of the Regional Transportation Plan on November 30, 2023 (Metro Ordinance 23-1496). The Climate

Friendly and Equitable Communities (CFEC) update to the Transportation Planning Rule OAR 660-012-0160(6) requires Metro to adopt a regional transportation plan *in which the projected vehicle miles traveled per capita of the financially constrained project list is consistent with the region's metropolitan greenhouse gas (GHG) reduction target.* Further still, Metro's Climate Smart Strategy which was incorporated into both the 2018 and 2023 Regional Transportation Plans calls for a reduction in VMT per capita in the region in order to achieve state-mandated greenhouse gas reduction goals.

10.4 Appendix J of the Regional Transportation Plan illustrates how Metro expects to comply with the Climate Smart Communities rule. Appendix J shows that the region will plan to reduce per capita levels of driving by 35 percent from current levels, and in effect hold the total vehicle miles traveled in the region to about the same level as today—20 million miles per day.

10.5 The Draft SDEIS shows that No-Build and Build traffic volumes used to model regional growth have much higher estimated growth than in the adopted Metro Regional Transportation Plan.

Table 3.1-2 reports that current (2015) daily vehicle miles traveled in the Portland Metropolitan area were 43.1 million.

Table 3.1-2. Regional Travel Measures – Existing 2015 Daily Vehicle Miles Traveled, Vehicle Hours Traveled, and Vehicle Hours of Delay

Area	Vehicle Miles Traveled	Vehicle Hours Traveled	Vehicle Hours of Delay [a]
Portland Metropolitan Region	43,115,600	1,225,400	19,400
Traffic Subarea (I-5, I-205, and I-84)	11,277,600	326,900	10,100

Source: Metro/RTC regional travel demand model.

a Delay is measured as time spent in congestion on network links that exceed 0.9 volume/capacity ratio.

Table 3.1-10 reports that 2045 daily vehicle miles traveled in the Portland region will be 58.5 million in the No-Build, and a tiny amount less (58.7 million) in the various versions of the single Build alternative.

Table 3.1-10. 2045 Weekday Daily Vehicle Miles Traveled, Vehicle Hours Traveled, and Vehicle Hours of Delay

Alternative	Study Area	Vehicle Miles Traveled	Vehicle Hours Traveled	Vehicle Hours of Delay
No-Build Alternative	Portland Metropolitan Region	58,835,800	1,793,400	64,000
	Traffic Subarea	14,291,000	436,400	24,300
Modified LPA (Base Scenario)	Portland Metropolitan Region	58,743,200	1,782,300	57,000
	Traffic Subarea	14,211,400	424,900	17,000
Modified LPA (Two Auxiliary Lane Design Option)	Portland Metropolitan Region	58,751,200	1,781,800	56,700
	Traffic Subarea	14,219,500	424,300	16,600
Change between No-Build and Modified LPA Base Scenario	Regional Difference	-92,700 (<-1%)	-11,100 (-1%)	-7,000 (-11%)
	Subarea Difference	-79,600 (-1%)	-11,500 (-3%)	-7,300 (-30%)
Change between No-Build and Modified LPA Two Auxiliary Lane Design Option	Regional Difference	-84,600 (<-1%)	-11,600 (-1%)	-7,300 (-11%)
	Subarea Difference	-71,400 (-1%)	-12,100 (-3%)	-7,700 (-32%)
Change between Modified LPA Base Scenario and Modified LPA Two Auxiliary Lane Design Option	Regional Difference	8,000 (<-1%)	-500 (<-1%)	-300 (<-1%)
	Subarea Difference	8,200 (<-1%)	-600 (<-1%)	-400 (-2%)

Source: Metro/RTC Regional Travel Demand Model.

These figures imply a growth rate of average weekday VMT of 1 percent annually percent from 2015 through 2045.

These estimated growth rates are inconsistent with the growth rate in VMT allowed for in the Metro RTP. According to the Metro RTP, Appendix J, the region's plan is to reduce VMT per capita by 30 percent by 2045 from 2005 levels, and thereby, with population growth, to hold the growth in VMT between 2020 and 2045 to zero.

Metro's current RTP says it puts the region on a path to reducing greenhouse gas emissions, and comply with state climate policies by making investments in the transportation system that reduce driving. And when it comes to its climate analysis, the RTP projects that the region will cut per capita driving by more than 30 percent from current levels. The Climate Analysis (Appendix J, page 9) makes this claim:

The RTP Climate Analysis (Appendix J, page 9) claims that per capita VMT will decline by 31 percent from 2020 levels by 2045.

> 3. The RTP supports state goals to reduce greenhouse gas emissions and is expected to meet state-mandated targets for reducing per capita greenhouse gas emissions from household light-duty vehicles by 2045.
>
> o By 2045, the plan, together with advancements in fleet and technology, is expected to reduce per capita annual greenhouse gas emissions from light duty household vehicles by 80.1 percent (compared to 2020 levels) and reduce total greenhouse gas emissions from light-duty household vehicles by 76.7 percent (compared to 2020 levels).
>
> o By 2045, the plan, together with advancements in fleet and technology, is expected to reduce VMT per capita of light-duty household vehicles by 39 percent (compared to 2005 levels) and by 31 percent from (compared to 2020 levels).
>
> Metro 2023 Regional Transportation Plan, Appendix J. page 9. https://www.oregonmetro.gov/sites/default/files/2023/07/13/2023-RTP-Appendix-J-public-review-draft-20230710.pdf

10.6 The Interstate Bridge Project's Benefit Cost Analysis, is also based on Metro's regional travel demand model, and contains similar estimates of vehicle miles of travel in the "study area," a portion of the region that includes the Interstate Bridge Project. The modeling used by IBR asserts that vehicle miles traveled in the study area will increase from a current level of about 11.7 million miles per day to 14.3 million miles in the No Build and 14.2 million miles per day in the Build Scenario. These represent an increase in vehicle miles traveled of about 0.85 percent per annum, slightly slower than for the region as a whole.

IBR Automobile Travel Data

Travel Demand Modeling Results for IBR Program (Project Study Area) - Daily Results

Travel demand modeling results were estimated as part of the IBR Program 2023.

		Existing	Build		No Build	
Variable	**Units**	**2017**	**2027**	**2045**	**2027**	**2045**
VMT - Study Area - separate for Auto and Truck	veh-miles	11,277,649	12,326,878	14,211,373	12,879,706	14,291,079
Auto	veh-miles	10,754,643	11,678,788	13,269,111	12,187,142	13,354,614
Truck	veh-miles	523,006	648,090	942,262	692,564	936,465

10.7 The RTP assumes that the state and region will implement a series of pricing measures, including a carbon tax, a vehicle miles traveled fee, tolling on some area roadways, and pricing of major throughways, along with implementation of "pay as you drive" per mile insurance. Appendix J of the adopted RTP says that implementation of these measures, which is essential to achieving adopted greenhouse gas reduction goals, will reduce vehicle miles traveled per capita sufficiently to hold aggregate vehicle miles traveled

in the metropolitan region to their current level of approximately 20 million vehicle miles per day. These RTP policies should be included in the "No-Build" alternative, but are not.

The DSEIS omits any mention of these climate policies. Specifically, the Climate Analysis for the Interstate Bridge Replacement SDEIS makes no mention of the Oregon's Climate Friendly and Equitable Communities (CFEC) Rule which requires Metro to plan for a 30 percent reduction in per capita vehicle miles traveled in the Portland Metropolitan area. The climate analysis section of the SDEIS recites a litany of Oregon and Washington Greenhouse Gas reduction policies but makes no mention of the Oregon's CFEC rules and Metro's obligation to reduce VMT by 30 percent by 2050 in order to reduce greenhouse gas emissions.

> Washington and Oregon have policies intended to promote a shift away from GHG emissions in the transportation sector. These transportation-related transition policies are summarized in Table 3.19-2.

This table (Table 3.19-2) mentions Oregon's Climate Protection program (focusing on fossil fuel use), Oregon's Clean Fuels Program (mandating biofuels), Oregon's Clean Energy targets (for electricity generation) and three "clean car programs": Zero Emission Vehicles, Clean Cars and Clean Trucks, all of which address vehicle emission rates, but not VMT. Despite claiming to summarize "transportation-related" climate policies, the SDEIS description completely omits any mention of state and regional rules and plans that mandate a reduction in per capita VMT--almost certainly because the projections presented to justify the IBR project are predicated on absolutely no change in per capita VMT.

10.8 The modeling scenario used to compute the "No-Build" level of traffic in the IBR's traffic modeling is not consistent with the region's adopted Regional Transportation Plan (RTP). The RTP calls for extensive implementation of pricing in the region and on the region's roads. The "No-Build" traffic levels shown in the IBR SEIS are artificially (and illegally) high, and thus overstate the environmental benefits of the build alternative. The IBR traffic forecasts for the No-Build alternative need to be consistent with those used in the Climate Analysis of the RTP, which would include no net increase in aggregate regional VMT.

10.9 The modeling scenario used to compute the "Build" alternative also fails to include the pricing policies incorporated in the Regional Transportation Plan. As a result, the level of vehicle travel contemplated in the "Build Scenario)— a 27 percent increase from current levels—is likewise inconsistent with the adopted regional transportation plan, which calls for no overall increase in VMT in the region.

11. Fails to incorporate post-Covid changes in travel behavior and land use patterns

The models used to predict future travel demand for the Interstate Bridge project are based on data, assumptions and relationships that pre-date the Covid-19 pandemic. The pandemic has accelerated a shift toward "work from home" and increased electronic commerce that has had the effect of reducing automobile travel, and likely permanently changing travel patterns.

11.1 The persistent effects of post-pandemic changes in travel behavior are not reflected in IBR revenue forecasts.

11.2 ODOT data show that traffic levels, post-pandemic, have departed significantly from pre-pandemic travel trends. A 2023 report, authored by ODOT traffic counting expert Becky Knudsen reports that traffic volumes on I-5 are lower now than in 2019, and have not increased following the 2020 Covid-19 pandemic. Becky Knudsen, "Pandemic Impacts on Future Transportation Planning: Implications for Long Range Travel Forecasts", ODOT, July 2023. Knudsen's data show that traffic on I-5 in Portland was 7 percent below 2019 levels in 2023, even lower than it had been two years earlier (when it was 6 percent below 2019 levels).

TABLE 1. I-5: Percent Difference in Traffic Volumes Compared to 2019: Month of April 2021, 2022, and 2023

	Year	Portland	Willamette Valley	Southern Segment
Average Weekday	2021	-6%	-2%	5%
	2022	-8%	-5%	-1%
	2023	-7%	-4%	-7%
Average Weekend	2021	-10%	0%	6%
	2022	-5%	0%	0%
	2023	-4%	-2%	10%
Overall Average	2021	-6%	-1%	6%
	2022	-7%	-3%	-1%
	2023	-6%	-4%	-3%

Source: Portland Region Automatic Traffic Recorders (ATRs): 03-011,026-004, 26-016; Willamette Valley: 20-020, 20-025, 22-005; Southern I-5: 10-008, 15-019, 15-002; this table provides averages across the 3 ATRs for each region.

11.3 WSDOT data on travel show that travel levels and congestion have declined significantly from pre-pandemic levels, and continue to be dramatically lower, WSDOT's

Mobility Dashboard reports that traffic congestion is down sharply in Clark County with a persistent and sustained decline in congestion-related travel delays. According to WSDOT data, total vehicle hours of delay in Clark County's three principal roadways are down more than 75 percent from pre-Covid (2019) levels. Washington State Department of Transportation, Multimodal mobility dashboard - Vancouver region, 2023, https://wsdot.wa.gov/about/data/Multimodal-mobility-dashboard/dashboard/vancouver/default.htm

11.4 IBR's own Level 2 forecast reports that traffic across the I-5 Bridge had still not recovered to pre-pandemic levels as of 2022. Average weekday traffic in October 2022 was 136,500, compared to 143,400 in 2019, 4.8 percent below pre-pandemic levels. (Stantec, Level 2 Analysis, Table 2.6). At the pre-pandemic rate of traffic growth (0.3% per year), it will take until 2039 before travel across the I-5 bridge recovers to its pre-pandemic level.

11.5 Since 2019, the Federal Highway Administration has lowered its forecast of the future increase in driving by light duty vehicles by almost half. In 2019, prior to the pandemic the Federal Highway Administration predicted that the 20-year increase in vehicle miles traveled by light duty vehicles would be 1.1 percent per year (Federal Highway Administration, FHWA Forecasts of Vehicle Miles Traveled (VMT): Spring 2019, https://www.fhwa.dot.gov/policyinformation/tables/vmt/2019_vmt_forecast_sum.pdf).. In 2023, the Federal Highway Administration lowered its predicted 20-year increase in vehicle miles traveled to 0.6 percent per year Federal Highway Administration, FHWA Forecasts of Vehicle Miles Traveled (VMT): Spring 2023 https://www.fhwa.dot.gov/policyinformation/tables/vmt/vmt_forecast_sum.cfm, .

11.6 Estimates by the Maryland Department of Transportation show that pandemic induced changes in travel behavior have likely reduced future growth in vehicle miles traveled. They conclude:

> VMT under all scenarios is estimated to be less than VMT under "Old normal" (Pre-pandemic conditions) scenario. It is estimated that 2045 total VMT reduction because of COVID-19 ranges between 3 % and 12 % with an average of 7 % across all scenarios. Shemer, L., Shayanfar, E., Avner, J., Miquel, R., Mishra, S., & Radovic, M. (2022). COVID-19 impacts on mobility and travel demand. *Case studies on transport policy*, *10*(4), 2519–2529. https://doi.org/10.1016/j.cstp.2022.11.011

11.7 Stantec concedes in its analysis that the long-term effects of Covid-19 could invalidate its projections of future travel levels.

> The assumptions and resulting forecasts could change based on a variety of factors, including but not limited to: (a) economic conditions; (b) social and demographic

> conditions; (c) force majeure; (d) changes in operations and maintenance of the toll facility represented in the Report; and/or (e) new or changed transportation network or transit systems in the Portland/Vancouver region. These potential risks and uncertainties may be magnified by the transitory or permanent effects of the COVID-19 pandemic on mobility, travel, and the economy.
> (Stantec, Level 2 report, page vii, emphasis added)

12. Traffic modeling has not been transparent

Traffic numbers are generated by a complicated model which is kept secret. Metro and IBR have fought attempts to release this information that would let others gauge the accuracy of their claims about future traffic.

Metro and IBR have resisted the release of data and documentation showing how they came up with their traffic forecasts.

A careful analysis of this previously undisclosed data shows that the models and their predictions are flawed and misleading.

The errors are substantial: they exaggerate the need for the project, making it more expensive than it needs to be to accommodate actual future traffic; it mis-states the project's likely environmental consequences.

The IBR traffic projection process is shrouded in secrecy.

The operation of the Metro Model and the additional operations performed by IBR (microsimulation and post-processing) are generally opaque to outside observers. Presentation materials released by IBR present only the conclusions of its technical efforts and do not fully describe the methods, assumptions or data used to produce those conclusions. As a result, outside observers do not have any reasonable basis for understanding or questioning how the results were obtained nor can they replicate these calculations: The modeling effort is effectively a black box, whose operation and features are known only to selected insiders. Others cannot verify, question or modify any of these assumptions to see how they affect model results.

Courts have recognized that this "black box" approach to producing traffic projections is a violation of the requirements of the National Environmental Policy Act (NEPA). 1000 Friends of Wisconsin v. USDOT, Dist Ct ED Wisconsin (2016) Case No. 11-C-0545. In this

case, Federal Judge Lynn Adelman ruled that the agency failed to explain how it reached its conclusions, invalidating its projections.

> In my prior decision, I did not find that the traffic projections were flawed. Rather, I determined that I could not decide whether the projections were flawed because WisDOT had not fully explained how it applied its methodology. See Dec. and Order at 9-14. * * * In my prior decision, I found that although WisDOT had generally explained its methodology for projecting traffic volumes in the impact statement, it had not adequately explained how it applied that methodology. Specifically, I found that WisDOT had not shown how the raw data it used resulted in the bottom-line numbers that appear in the impact statement for each of the project alternatives. Dec. and Order at 11.
>
> * * * because it is clear that the traffic forecasts played an important role in the evaluation of reasonable alternatives, I cannot conclude that WisDOT's failure to follow its own methodology and reach compromise projections was harmless. For these reasons, I conclude that the traffic projections used in the impact statement's evaluation of reasonable alternatives were not produced through a reasoned application of WisDOT's stated methodology, and that the agencies' evaluation of reasonable alternatives was deficient.

12.1 The IBR didn't disclose the AWDT figures in its April Legislative presentation, which are the most basic measures over overall traffic volume. Instead, it showed only vague but alarming heat maps and conclusory travel time data.

12.2 Neither Metro nor IBR published the output of the Kate RTDM. These were released by Metro pursuant to a public records request, only after Metro rescinded a proposed fee of $2,031.92 to release the records, claiming that the release was not in the public interest. Metro's delay assured that these records would not be publicly available prior to the Metro Council vote on the LPA. The IBR project, through the WSDOT, failed to release the Metro Kate Data that were in its possession.

12.3 Metro does not publish on its website the Kate Model validation report. The model validation report shows that there is a significant error and bias in the Kate model's predictions of traffic on the I-5 and I-205 bridges. The Kate model validation report is dated August 2017 and is cover and every content page is stamped "DRAFT," but no final report has ever been produced.

12.4 Metro undertook 24 different scenario traffic demand model runs with a range of different assumptions about the configuration of the road system and applicable tolling.

Metro did not disclose any of this information until it responded to a public records request.

12.5. In April, 2022, the IBR presented limited traffic information to the Joint Oregon Washington Legislative Oversight Committee.

126. On May 3, 2022, we filed a public records request with the Washington Department of Transportation (the agency that houses the IBR project staff), requesting full documentation of the IBR modeling.

12.7. Only June 6, 2022, WSDOT provided a handful of documents with conclusory information from forecasts, but no information about methodology, or supporting documents showing how forecasts were created.O

12.8. On July 19, 2022 we informed WSDOT that its request was incomplete and non-responsive, inasmuch as it failed to provide detailed information describing the project's data and methodology.

12.9. On August 19, 2022, we provided WSDOT with examples of documents that were in WSDOT's possession (documents either prepared by or submitted to IBR, that we obtained independently). We told WSDOT that the existence of these documentations showed that WSDOT had failed to comply with our public records request as required by Washington Law.

12.10. On October 3, 2022. IBR responded to our provision of these documents by asserting that they were not within the scope of our original request.

12.11. On October 12, 2022, WSDOT asked us to change our request. We declined to do so, and reiterated our original request for all data related to traffic modeling.

12.12 On December 1, 2022, WSDOT responded that it had identified voluminous records that were within the scope of our request, and informed us that they would charge $812 for the release of such documents, and that it might take up to two years to obtain such documents.

12.13. On December 21, 2022, we paid a deposit of $81.20 to WSDOT-under protest-to secure the release of these documents.

12.14 On January 31, 2023, WSDOT provided us with a link to electronic files containing hundreds of documents (totaling several gigabytes of data of data).

12.15 WSDOT went to great lengths to frustrate and delay our access to these documents, all of which are public records, and all of which are essential to a full and fair public debate about the Interstate Bridge Replacement project.

13. Modeling flaws constitute environmental and financial fraud

By over-stating travel demand in the "No-Build" scenario, and failing to accurately account for the effect of tolling on traffic in the build scenario, the IBR modelers have created a fictitious case for expanded road capacity, and falsely portrayed the environmental consequences of the two alternatives.

ODOT, WSDOT and their contractors are engaged in systematic financial and environmental fraud. Their false traffic projections are being used to lobby state and federal authorities for more money for a much larger—and vastly more expensive--project than is actually needed to accommodate future traffic, especially if either the I-5 bridge or the region's freeways are tolled, as the agency says it plans, and as the Oregon Legislature has already authorized. This is financial fraud because federal funds are being sought based on false representations about traffic levels. This is environmental fraud because it falsely claims that the massive I-5 expansion will reduce greenhouse gas emissions.

The practical effects of the consistent over-statement of future travel, especially in the No-Build alternative, is to paint a false picture of future traffic congestion, and to make the No-Build alternative look worse from a traffic and an environmental perspective than it actually is. The IBR forecasts predict higher levels of traffic if the I-5 bridge ISN'T widened than if it is, which allows the IBR to claim its massive expansion will generate less pollution than not widening.

ODOT and WSDOT are keeping two different sets of books for traffic projections: one set, which exaggerates traffic levels, is used to size the project, and to create a false environmental analysis. But ODOT and WSDOT also acknowledge that they will have to create a separate, more realistic set of traffic projections: both private lenders and the federal government require undertaking an independent investment grade analysis. Private markets require this because they know that highway department forecasts are biased and wrong: they refuse to lend money to projects based on such forecasts.

The track record of the so-called "Level 2" forecasts prepared by ODOT and WSDOT for the CRC Environmental Impact Statement compared to the projections made by CDM Smith show that the Level 2 analysis is wildly wrong, and the CDM Smith estimates are highly accurate. State DOT's like to maintain that the Investment Grade Analysis is somehow an unrealistically pessimistic, worse-case scenario: but in fact the CDM Smith IGA for the CRC has proven to be far more accurate than the agency's own forecasts. In addition, Investment Grade Analyses prepared for other toll projects around the country routinely over-estimate traffic and revenue levels: they are not- worst-case scenarios

ODOT and WSDOT, and by extension, the Federal Highway Administration, which has delegated its responsibility for compliance with the National Environmental Policy Act, are using fraudulent traffic projections to demonstrate compliance with environmental laws. Just as European diesel manufacturers rigged automotive software to generate false emission test results, the state DOTs have rigged their traffic projection software to falsely generate high levels of traffic and pollution in the "no-build" scenario, thereby creating the false conclusion that the massive highway expansion project will not increase pollution.

14. IBR has incorrectly defined the "No Build" alternative by failing to include Regional Mobility Pricing, an adopted regional policy

The SDEIS estimates the environmental effects of the IBR project by comparing traffic levels in the "no-build" scenario with traffic levels in the "LPA" or build scenario. If the SDEIS incorrectly specifies the conditions for the "No-Build" scenario (estimated traffic and related emissions in 2045), then its estimates of the net environmental effects of the LPA are incorrect. The IBR has defined the "no-build" alternative to predict an exaggerated level of traffic because it has omitted the effects of road pricing that are called for in adopted state and regional transportation plans.

14.1 Regional Mobility Pricing is part of the adopted Regional Transportation Plan. It is included in the near term constrained RTP project list, to be implemented between 2023 and 2030.

> 8.3.1.7 I-5 & I-205 Regional Mobility Pricing Project The Regional Mobility Pricing Project (RMPP) will apply congestion pricing on all lanes of Interstate-5 (I-5) and Interstate-205 (I-205) to manage travel demand and traffic congestion on these

> facilities in the Portland, Oregon metropolitan area in a manner that will generate revenue for transportation system investments. The pricing varies by time of day according to a set schedule, which can be updated periodically by the Oregon Transportation Commission. Higher fees will be charged during peak travel periods (such as morning and evening peak hours) and lower fees during off-peak hours. Congestion pricing is intended to encourage motorists to plan travel in advance and allows traffic to flow more freely during peak times.
> Metro, Regional Transportation Plan, 2023, page 8-70

14.2 IBR failed to include a "No-Build with RMPP" scenario in its modeling. The "No-Build" scenario modeled by Metro, as well as the No-Build scenarios reported by IBR,

14.3 By 2045, Regional Mobility Pricing (RMPP) will significantly reduce traffic on I-5 and I-205 and reduce or eliminate the need for additional capacity on the Interstate Bridge. Although ODOT did not prepare an analysis of the impact of RMPP for the IBR project, it did prepare such an analysis as a supplement to the environmental work for the I-5 Rose Quarter project, less than 5 miles South of the IBR project location.

14.4 ODOT's analysis of the effect of the Regional Mobility Pricing Program on vehicle travel and traffic congestion for the I-5 Rose Quarter project which shows that RMPP pricing would reduce traffic volumes, vehicle miles traveled and traffic congestion on I-5. (ODOT Memo: RMPP/RQ Regional Travel Demand Model Sensitivity Test Results Summary, July 22, 2022). Because much of the traffic traveling through the Rose Quarter also continues on I-5 and crosses the I-5 Columbia River Bridge, reduced traffic on this roadway segment would directly reduce traffic on the I-5 bridges, something not accounted for in IBR modeling).

For example, the analysis shows traffic between the Broadway-Weidler Interchange and I-405 would be reduced 20 percent if pricing is implemented and the Rose Quarter project isn't built.

14.6 The IBR should revise the "No-Build" traffic projections for I-5 and I-205 to include the full implementation of Regional Mobility Pricing. Correcting the "No-Build" estimates to include the effect of RMPP will significantly reduce expected traffic levels on I-5, and show that the proposed Locally Preferred Alternative has very different traffic impacts (relative to the No-Build) than those disclosed in the current draft environmental analysis.

14.7 In addition to Regional Mobility Pricing, the adopted Regional Transportation Plan is predicated on the assumption that between now and 2045 the State of Oregon will adopt a series of policies to further price vehicle travel in ways which will dramatically reduce

vehicle miles traveled per capita in the Portland area. State land use regulations require Metro to plan for a reduction in VMT/capita of 35 percent from current levels by 2050. Metro's adopted RTP states that it is based on the assumption that the State will implement a series of policies including a carbon tax, road pricing, tolling of selected roadways and "pay as you drive" insurance that will reduce per capita driving in the Portland Metropolitan Area by 31 percent by 2045. (Metro, Regional Transportation Plan, Appendix J). This reduction implies that total vehicle miles traveled in the region will remain roughly constant at about 20 million vehicle miles per day through 2045 (i.e. no net, aggregate increase from today's levels). The IBR's "No-Build" scenario does not include any analysis of the effects of these policies, and so overstates the amount of driving that will occur in the region in the No-Build scenario, and also overstates the amount of vehicle traffic which would use the I-5 bridges in the No-Build scenario.

14.8 Metro's "Kate" model confirms the sensitivity of traffic on the existing I-5 system to tolling. This model was used to estimate traffic levels on I-5 with tolling in the No-Build Scenario. Tolling I-5 in the No-Build would be expected to reduce I-5 average weekday traffic on the I-5 bridges from 192,100 vehicles per day in 2045 in the No-Build with no tolling to 153,625 for the No-Build with tolling--a reduction in traffic volume of 20 percent. (Metro, Excel Spreadsheet "IBR_L2_SDEIS_I5_I205_xing_auto_truck_022723" (February 27, 2023, Tab Summary, "SDEIS NB" compared to "SDEIS NB Tolled").

Metro, IBR Modeling, February 2023, 2045 I-5 and I-205 Bridge Average Weekday Traffic

Scenario	I-5	I-205	Total
SDEIS NB	192,100	205,505	397,605
SDEIS NB tolled	153,625	227,362	380,988
Delta Tolls	-38,474	21,857	-16,617
	-20%	11%	-4%
SDEIS LPA	164,455	220,162	384,617
SDEIS LPA No Toll	215,398	192,732	408,129
Delta Tolls	50,943	-27,431	23,512
	31%	-12%	6%

Source: Metro, IBR_L2_SDEIS_I5_I205_xing_auto_truck_022723.xlsx

14.9 Modeling done for the ODOT's Value Pricing study concluded that the preferred implementation of Regional Mobility Pricing (Concept C) would have the effect of reducing total regional VMT by about 2 percent.

> Concept C could produce significant decreases to regional VMT, a daily decrease of 2 percent.
> Oregon Department of Transportation. Portland Metro Area Value Pricing Feasibility Analysis, Final Round 2 Concept Evaluation, Technical Memorandum 4. May 7, 2018. Page 94.

14.10 IBR has been inconsistent in its definition of the No-Build alternative. The No-Build alternative includes the I-5 Rose Quarter project, which has not completed environmental review and which lacks funding. The Rose Quarter project is included as added capacity but not the implementation of the regional mobility pricing program which is, according to state officials, the only way the project is likely to be paid for. It is arbitrary and capricious for IBR to include some elements of the RTP in its "No Build" projects (i.e. the capacity and traffic associated with building the Rose Quarter project) but not other elements of the RTP (i.e. the traffic reductions that would flow from the RMPP, which is also in the RTP).

15. IBR plans to reduce or eliminate tolls after construction bonds are paid and has failed to disclose the environmental effects associated with lower tolls.

The IBR SDEIS assumes that the environmental effects of the I-5 widening will be largely offset by the imposition of tolls. But state policy and political pressure are likely to lead the states to reduce or eliminate tolling on I-5, which would lead to much higher levels of traffic, congestion and pollution. These possible effects are not analyzed or disclosed in the SDEIS, in violation of NEPA.

15.1 The IBR project relies on a high level of tolls to reduce traffic levels and minimize environmental impacts. Cutting or eliminating tolls will induce additional traffic.

15.2 The SDEIS does not evaluate the effect of reducing or eliminating tolls. If tolls are lower than described in the SDEIS, environmental effects, especially traffic levels will be

higher. The Metro model forecasts that widening I-5 as recommended in the Locally Preferred Alternative (LPA) and **not** charging tolls will cause 215,398 vehicles per typical weekday to use the bridge in 2045. That would be an increase of 50,000 vehicles per day over the level of traffic in the Locally Preferred Alternative with tolling, and would represent an increase of 23,500 vehicles per day crossing the Columbia River. (These Metro forecast figures were prepared for the IBR, but were not included in the project's environmental impact statement).

Metro, IBR Modeling, February 2023, 2045 I-5 and I-205 Bridge Average Weekday Traffic

Scenario	I-5	I-205	Total
SDEIS NB	192,100	205,505	397,605
SDEIS NB tolled	153,625	227,362	380,988
Delta Tolls	-38,474	21,857	-16,617
	-20%	11%	-4%
SDEIS LPA	164,455	220,162	384,617
SDEIS LPA No Toll	215,398	192,732	408,129
Delta Tolls	50,943	-27,431	23,512
	31%	-12%	6%

Source: Metro, IBR_L2_SDEIS_I5_I205_xing_auto_truck_022723.xlsx

The failure to disclose the reasonably foreseeable effects of reducing or eliminating tolls is a violation of NEPA.

15.3 State officials say that tolls will be reduced or eliminated once IBR toll bonds are repaid.

> Much of what Oregon wants to do with the new Interstate Bridge can be traced back to a law passed back in 2013, according to ODOT assistant director Travis Brouwer. Those include a provision that tolls must be reduced after the bridge construction debt is paid off — but it does not require that the tolls be removed entirely, and it's not very specific about the reduction amount. That will be up to the transportation commissions.

https://www.kgw.com/article/news/local/the-story/interstate-bridge-i-5-toll-vancouver-portland-price-cost/283-f883efc4-c1fe-4e26-b9a2-d01c5e610f2c

15.4 Oregon has demonstrated a propensity to renege on assurances that it would impose tolls on highway projects. The Oregon Department of Transportation indicated that it would use tolls to pay for the reconstruction of the I-205 Abernethy Bridge, but then abandoned this policy after project construction was started. Similarly, Oregon Governor Tina Kotek stopped implementation of the Regional Mobility Pricing Program which would have imposed tolls on I-5 and I-205 in the Portland area. These examples show that it is a reasonably foreseeable possibility that tolls on the I-5 Interstate Bridge will be reduced or eliminated within the lifetime of the project, and that this would produce dramatically different levels of traffic and environmental effects than are analyzed in the DSEIS.

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IBR Draft SEIS - RECORD #2626 DETAIL

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IBR Draft SEIS - RECORD #2626 DETAIL

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Topic Area:
Transportation

Comment:
I carefully followed the CRC I-5 Bridge proposal 2008-2013 when it was duly cancelled for two specific reasons: Instead of Double-deck design, single-deck is the only sensible option. Hayden Island Access design flaws (exit-ramps were inherently dangerous, steep uphill on-ramps meant noisy traffic, more air pollution, merging more dangerous).

With single-deck design, I favor 4-lanes southbound and 5-lanes northbound (extra lane for heavier afternoon traffic and because the exits to SR14 and downtown Vancouver are too close together), 4-lanes southbound because there'll be only 1 exit to Marine Drive. Adding 2-lanes for transit to southbound span (4+2 = 6 lanes), adding 1-lane northbound for the ped/bikeway, (5+1 = 6 lanes) thus both spans are equal width, a likely

reduction of costs.
On further examination, the current design presents wholly unacceptable traffic hazards and excessive construction. It's particularly bad engineering which suggests ODOT & Wsdot are "padding their paychecks" to rip off taxpayers. Based on my experience analyzing transportation planning, I can understand why conservatives despise government.

JCA comment #: 657

IBR Draft SEIS - RECORD #2627 DETAIL

First Name :	Dina
Last Name :	New
Attachments :	DSEIS-2627_New_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2627 DETAIL

Submission Date : 11/18/2024

First Name : Dina

Last Name : New

Business/Organization/Agency :

Submission Input :

Please consider a bridge without light rail. The addition of light rail increases the cost of a new crossing for no demonstrable benefit to mobility. Ridership is low on light rail and its inclusion on this bridge will not decrease vehicle congestion.

Because of the traffic congestion south of the bridge, a third bridge would be a better investment for freight mobility and congestion.

IBR Draft SEIS - RECORD #2628 DETAIL

First Name :	Spencer
Last Name :	Thayer
Attachments :	DSEIS-2628_Thayer_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #2628 DETAIL

Submission Date : 11/18/2024
First Name : Spencer
Last Name : Thayer
Business/Organization/Agency :

Submission Input :

First Name:
Spencer

Last Name:
Thayer

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
The IBR project represents a colossal misuse of resources that will worsen congestion, harm housing affordability, and deepen transportation inequities. This $7.5 billion freeway expansion will induce more driving, leading to the same gridlock it claims to solve while increasing pollution and urban sprawl.

Instead of investing in sustainable, equitable transit solutions, this project prioritizes car infrastructure that

displaces communities and drives up housing costs. Low-income residents and transit users will be left behind, forced to bear the burden of increased sprawl and unaffordable transportation systems.

The financial cost is staggering, diverting billions from critical needs like education, bridge repairs, and public transit. State budgets are stretched thin, and prioritizing this mega-project means other essential services will suffer—all for the benefit of construction firms and developers.

Reject the IBR project and push for investments in affordable housing, expanded public transit, and climate-resilient infrastructure. This project is a step in the wrong direction—let’s stand up for solutions that serve everyone, not just wealthy interests.

JCA comment #: 656

IBR Draft SEIS - RECORD #2629 DETAIL

First Name :	ISRAEL
Last Name :	LOPEZ
Attachments :	DSEIS-2629_LOPEZ_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #2629 DETAIL

Submission Date : 11/18/2024
First Name : ISRAEL
Last Name : LOPEZ
Business/Organization/Agency :

Submission Input :

First Name:
ISRAEL

Last Name:
LOPEZ

Email:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
The current IBR plans lack cycling infrastructure that connects to key areas. Ideally, there should be a direct bike/pedestrian connection to the Columbia Slough path and the Kenton neighborhood. This direct connection would help eliminate numerous pinch points and potential conflict areas between cars and cyclists.

JCA comment #: 655

IBR Draft SEIS - RECORD #2630 DETAIL

First Name :	ISRAEL
Last Name :	LOPEZ
Attachments :	DSEIS-2630_LOPEZ_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #2630 DETAIL

Submission Date : 11/18/2024
First Name : ISRAEL
Last Name : LOPEZ
Business/Organization/Agency :

Submission Input :

First Name:
ISRAEL

Last Name:
LOPEZ

Email:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Neighborhoods and Equity

Comment:
In the IBR construction plan, what assurances are there that pedestrian and cycling paths will remain accessible and connected to key areas such as the Columbia Slough, Kenton, Hayden Island, and Vancouver throughout the construction period?

JCA comment #: 654

IBR Draft SEIS - RECORD #2631 DETAIL

First Name :	ISRAEL
Last Name :	LOPEZ
Attachments :	DSEIS-2631_LOPEZ_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #2631 DETAIL

Submission Date : 11/18/2024
First Name : ISRAEL
Last Name : LOPEZ
Business/Organization/Agency :

Submission Input :

First Name:
ISRAEL

Last Name:
LOPEZ

Email:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
Why aren't elevators being considered in the IBR design to help avoid the initial elevation climb from the waterfront to the pedestrian and bike path?

JCA comment #: 653

IBR Draft SEIS - RECORD #2632 DETAIL

First Name :	ISRAEL
Last Name :	LOPEZ
Attachments :	DSEIS-2632_LOPEZ_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #2632 DETAIL

Submission Date : 11/18/2024
First Name : ISRAEL
Last Name : LOPEZ
Business/Organization/Agency :

Submission Input :

First Name:
ISRAEL

Last Name:
LOPEZ

Email:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
Why don’t the current visualizations and designs of the IBR bridge extend all the way to the Evergreen Blvd community connector? Traveling from Main Street to the IBR bridge shouldn’t require losing elevation only to have to climb back up using the corkscrew approach.
I propose incorporating a pedestrian/bike path that begins at the Evergreen Blvd path.

JCA comment #: 652

IBR Draft SEIS - RECORD #2633 DETAIL

First Name :	ISRAEL
Last Name :	LOPEZ
Attachments :	DSEIS-2633_LOPEZ_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #2633 DETAIL

Submission Date : 11/18/2024
First Name : ISRAEL
Last Name : LOPEZ
Business/Organization/Agency :

Submission Input :

First Name:
ISRAEL

Last Name:
LOPEZ

Email:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
What measures are being considered in the IBR design to mitigate the impact of rain and inclement weather on the pedestrian and cycling path?

Currently, the proximity of the I-5 bridge to the pedestrian/cycling path creates an unpleasant experience, with road debris and spray affecting users. Additionally, heavy rainfall can make the path slippery and hazardous.

JCA comment #: 651

IBR Draft SEIS - RECORD #2634 DETAIL

First Name :	Matthew
Last Name :	Almeida
Attachments :	DSEIS-2634_Almeida_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #2634 DETAIL

Submission Date : 11/18/2024
First Name : Matthew
Last Name : Almeida
Business/Organization/Agency :

Submission Input :

First Name:
Matthew

Last Name:
Almeida

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
I'm writing in regards to the Interstate Bridge replacement project.

True multi-modal transportation is an absolute necessity if the goal is to reduce congestion and carbon pollution from our region. The plan now had some serious gaps in regards to linking the bike route to the rest of the transportation options and if unaddressed it is going to actively prevent the adoption of less polluting

transportation methods.

If the bike path cannot be reached immediately upon exit of the public transit options, it will dissuade users for safety and convenience reasons.

Either this project needs to take bike transportation, convenience, and safety necessary, or it seems to me it's just another project fated to be outdated and a green light for spending for no true advantage.

The public is probably on high notice because the I5 expansion in the Rose Quarter appears to be yet another attempt to budget for a project only bureaucrats want. Studies showing congestion won't be impacted unless changes are made further up and down the corridor also make this project seem like trying to look helpful while actually just wasting public dollars. Either the project needs to be geared for the population to actually use in a better future, or reconsidered altogether.

JCA comment #: 650

IBR Draft SEIS - RECORD #2635 DETAIL

First Name :	ISRAEL
Last Name :	LOPEZ
Attachments :	DSEIS-2635_LOPEZ_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #2635 DETAIL

Submission Date : 11/18/2024
First Name : ISRAEL
Last Name : LOPEZ
Business/Organization/Agency :

Submission Input :

First Name:
ISRAEL

Last Name:
LOPEZ

Email:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
How will the IBR project address multiple modes of transportation on the pedestrian and cycling path?

Currently, the I-5 bridge accommodates various forms of transportation, including e-motorcycles and gas-powered bicycles, likely because the interstate/automobile portion is unsafe for them. It's important to plan for these users, as more people opt for transportation methods beyond walking, cycling, and public transit.

Without accommodating these users, we risk pedestrian and cyclist injuries due to differences in speed and proximity to slower-moving individuals. Proper consideration and planning are essential to create a safe and functional shared path for all.

JCA comment #: 649

IBR Draft SEIS - RECORD #2636 DETAIL

First Name :	Kate
Last Name :	Mickelson
Attachments :	DSEIS-2636_Columbia River Steamship_Original.pdf (165 kb) Outlook-Diagram, t.png (25 kb) Outlook-pcymdywz.png (535 bytes) Outlook-ybmmcp0v.png (295 bytes) Outlook-jvq4buoq.png (396 bytes) Outlook-o2d210ya.png (521 bytes) Outlook-facebook.png (527 bytes) Outlook-linkedin.png (627 bytes) Outlook-iv03uoku.png (642 bytes) Outlook-4mbhtm3g.png (878 bytes) IBR DEIS CRSOA Letter_11182024.pdf (165 kb)

Columbia River Steamship Operators' Association, Inc.

November 15, 2024

Interstate Bridge Replacement Program
Attn: Draft SEIS Public Comment
500 Broadway, Suite 200
Vancouver, WA 98660
Via E-mail: draftseis@interstatebridge.org

Subject: Draft SEIS Public Comment

To Whom It May Concern,

The Columbia River is a dynamic and significant gateway for our regions' movement of goods and commerce, not only for our local communities but for the entire Pacific Northwest and beyond. The Columbia River is a cornerstone of the U.S. export economy. It allows the efficient movement of agricultural products from as far as the Midwest to international markets, as well as the import of goods that sustain industries and communities across the country. In 2022, the Columbia River system supported the movement of over 49.7 million metric tons of foreign trade at a value of approximately $31.2 billion.

Established in 1922, the Columbia River Steamship Operators' Association, Inc. (CRSOA) consists of members representing ship owners, operators, agents, launch services, towing, and bunkering, as well as facilities and ports along the Columbia, Willamette, Snake River and Oregon Coast River Systems. The mission of the CRSOA is to facilitate trade, provide business leadership, exercise principles of environmental stewardship, serve as an industry focal point, and promote operating policies and procedures that are safe, reliable, efficient, and cost effective. CRSOA expresses concerns that the Draft SEIS does not assess impacts related to increases in river levels and dismisses future river uses from dredging to authorized depths. The alternatives in the Draft SEIS must provide additional analysis of, and mitigation for, impacts to navigation.

Draft SEIS Must Assess Impacts of IBR on Navigation Based on Increased River Volumes.

The Draft SEIS does not adequately account for impacts of changing water levels in the Columbia River and what that may mean for bridge clearance and flow patterns. River operations require a navigation channel alignment that provides safe transit between the Vancouver BNSF railroad bridge and the Interstate Bridge in all river conditions with all types of barge tows. The Draft SEIS must analyze impacts to river hydrology from the IBR under various flow scenarios.

Executive Order 14008 requires the federal government account for climate resiliency in its planning. Climate models indicate a likely increase to seasonal drainage into the Columbia River system, which would result in increases to river levels. While the draft SEIS establishes a bridge vertical clearance of 116 feet, it fails to assess impacts related to rises to the river levels on vessel clearance.

Increasing the likelihood of impacts to river levels and flow is the uncertainty around the Columbia River Treaty. A core aspect of the Columbia River Treaty has been flood control. With the treaty expiring, and a lack of clarity as to any final agreement on flood control, the Draft SEIS needs to analyze impacts related to reduced vertical clearance as well as changes to flow patterns that may impact sedimentation and navigation.

Draft SEIS Must Assess Impacts Related to Reasonably Foreseeable River Uses.

NEPA requires federal agencies assess reasonably foreseeable impacts. The replacement of the Interstate Bridge is a once-a-century event. The EIS cannot be limited to examining current uses. CRSOA objects to the Draft SEIS not examining future uses based on the authorized dredge depth of 27 feet from Vancouver to the Dalles.

While the USACE currently dredges only to 14 feet, the agencies cannot use the current use as a rationale for rejecting the very real possibility of dredging to the allowable, and congressionally authorized, 27 feet. Examples from across the country illustrate that increasing the depth of inland waterways has significant attendant benefits. A deeper channel allows for more efficient transportation of goods to and from ports. For example, the deepening of the Delaware River Federal Navigation Channel allows for more efficient transportation of containerized, dry and liquid bulk, and roll-on/roll-off cargoes. Deepening a river channel can increase the productivity of a navigation system. For example, deepening the McClellan-Arkansas River Navigation System is expected to increase its productivity by 30 to 40 percent. Increased depth of inland waterways has also resulted in benefits to ecosystems, air quality, amongst other environmental factors.

Factual Inconsistencies in the Draft SEIS Need to be Fixed.

CRSOA incorporates the comments submitted by the Pacific Northwest Waterways Association (PNWA) as a whole. In particular, the Federal Highway Administration (FHWA) and Federal Transit Administration (FTA) must resolve inconsistencies in the Navigation Impact Report and the Draft SEIS related to the Columbia River Federal Navigation Channel (FNC), as noted by the PNWA:

- Mouth of the Columbia River (MCR) entrance Channel A (north reach) is 6 miles long, 2,000 feet wide and 55 feet deep, and Channel A (south reach) is 6 miles long, 640 feet wide and 48 feet deep.
- Lower Columbia River (LCR) from MCR (RM 3) to Portland, OR/Vancouver, WA (RM 105.5) is maintained to 43 feet deep by 600 feet wide.
- From Vancouver, WA to The Dalles, the FNC is authorized to 27 feet deep by 300 feet wide but is currently maintained to 17 feet deep.
- The Lower Willamette River (RM 0 to RM 11.6) is authorized to 43 feet deep with varying widths, but is currently maintained to 40 feet deep due to CERCLA issues.
- The Snake River is authorized and maintained at 14 feet deep by 250 feet wide.

As a longstanding advocate for the maritime industry on the Columbia River, the CRSOA recognizes the importance of ensuring that the IBR is conducted in compliance with all applicable environmental regulations. We commend the FHWA and FTA , in collaboration with the collaborating tribes, agencies

and state governments, for their efforts to address these requirements in the Draft SEIS and to engage with stakeholders throughout the process.

CRSOA is committed to supporting the continued operation of the Columbia River as a navigation hub that supports the success of our local economy, the sustainability of jobs, and the prosperity of the shipping community. We request the agencies assess impacts to navigation (and other environmental impacts) under differing flow rates and future uses.

Thank you for the opportunity to provide input on this important matter. We look forward to continued partnership with the stakeholders in ensuring the IBR does not adversely impact sustainable and effective navigation on the Columbia River.

Respectfully,

Kate Mickelson

Kate Mickelson
Executive Director

200 SW Market Street, Suite 190, Portland, OR 97201
503-505-3008 admin@crsoa.net www.crsoa.net

Columbia River Steamship Operators' Association, Inc.

November 15, 2024

Interstate Bridge Replacement Program
Attn: Draft SEIS Public Comment
500 Broadway, Suite 200
Vancouver, WA 98660
Via E-mail: draftseis@interstatebridge.org

Subject: Draft SEIS Public Comment

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Increasing the likelihood of impacts to river levels and flow is the uncertainty around the Columbia River Treaty. A core aspect of the Columbia River Treaty has been flood control. With the treaty expiring, and a lack of clarity as to any final agreement on flood control, the Draft SEIS needs to analyze impacts related to reduced vertical clearance as well as changes to flow patterns that may impact sedimentation and navigation.

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While the USACE currently dredges only to 14 feet, the agencies cannot use the current use as a rationale for rejecting the very real possibility of dredging to the allowable, and congressionally authorized, 27 feet. Examples from across the country illustrate that increasing the depth of inland waterways has significant attendant benefits. A deeper channel allows for more efficient transportation of goods to and from ports. For example, the deepening of the Delaware River Federal Navigation Channel allows for more efficient transportation of containerized, dry and liquid bulk, and roll-on/roll-off cargoes. Deepening a river channel can increase the productivity of a navigation system. For example, deepening the McClellan-Arkansas River Navigation System is expected to increase its productivity by 30 to 40 percent. Increased depth of inland waterways has also resulted in benefits to ecosystems, air quality, amongst other environmental factors.

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- The Lower Willamette River (RM 0 to RM 11.6) is authorized to 43 feet deep with varying widths, but is currently maintained to 40 feet deep due to CERCLA issues.
- The Snake River is authorized and maintained at 14 feet deep by 250 feet wide.

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and state governments, for their efforts to address these requirements in the Draft SEIS and to engage with stakeholders throughout the process.

CRSOA is committed to supporting the continued operation of the Columbia River as a navigation hub that supports the success of our local economy, the sustainability of jobs, and the prosperity of the shipping community. We request the agencies assess impacts to navigation (and other environmental impacts) under differing flow rates and future uses.

Thank you for the opportunity to provide input on this important matter. We look forward to continued partnership with the stakeholders in ensuring the IBR does not adversely impact sustainable and effective navigation on the Columbia River.

Respectfully,

Kate Mickelson

Kate Mickelson
Executive Director

200 SW Market Street, Suite 190, Portland, OR 97201
503-505-3008 admin@crsoa.net www.crsoa.net

IBR Draft SEIS - RECORD #2637 DETAIL

First Name :	Roger
Last Name :	Goldfinger
Attachments :	DSEIS-2637_Goldfinger_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #2637 DETAIL

Submission Date : 11/18/2024
First Name : Roger
Last Name : Goldfinger
Business/Organization/Agency :

Submission Input :

First Name:
Roger

Last Name:
Goldfinger

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
This generational project will determine the future of active transportation of the region. Failure to consider and prioritize the experience of active transportation users will limit the use of the crossing to a privileged few, wasting the effort put into this area. With full consideration of the experience of active transportation users, and a few tweaks, we can set up the generations to come with a crossing that serves all users. For example, including a multi-use path at the bridge's grade to the riverfront so that walkers/rollers/riders have direct access to the bridge. Provide plentiful connections to public transit and other modes.

JCA comment #: 648

IBR Draft SEIS - RECORD #2638 DETAIL

First Name :	D
Last Name :	Moss
Attachments :	DSEIS-2638_Moss_Original.pdf (6 kb)

IBR Draft SEIS - RECORD #2638 DETAIL

Submission Date : 11/18/2024
First Name : D
Last Name : Moss
Business/Organization/Agency :

Submission Input :

First Name:
D

Last Name:
Moss

Email:
[redacted]

Topic Area:
Transportation

Comment:
Hello,

I am writing in favor of a CRC that plans for present and future transportation needs of our region. We need light rail, we need walking and rolling access that is safe, and accessible. We need to encourage less traffic and more options for people to commute. We need a bridge that serves all people not just car drivers. We can't put this off any longer and can't fool ourselves about this bridge's role in mitigating carbon emissions. This bridge can make our region a leader again in smart, inclusive transportation that takes a holistic approach to multiple issues. For example, a good path will encourage commuters to use e-bikes to commute over the bridge reducing bridge traffic and emissions.

Thank you.

JCA comment #: 647

IBR Draft SEIS - RECORD #2639 DETAIL

First Name :	John
Last Name :	Ley
Attachments :	DSEIS-2639_Ley_Original.pdf (10 kb)

IBR Draft SEIS - RECORD #2639 DETAIL

Submission Date : 11/18/2024
First Name : John
Last Name : Ley
Business/Organization/Agency :

Submission Input :

Jim --
Excellent input.
Thank you!
John Ley

Sent from AOL on Android

On Mon, 18 Nov 2024 at 6:16 am, jim karlock<[redacted]> wrote: This project has several key elements that MUST BE CHANGED in order to serve the majority of the people.

1. It must have enough lanes to serve for the next 100 years.

That is probably FIVE lanes plus breakdown lanes.

2. It must NOT TOWER OVER VANCOUVER 90 ft in the air.

The lowest cost will likely be a low level bascule bridge with river channel and railroad bridge changes to reduce number of lifts to a few per month.

3. Its cost must be reasonable.

IBR flyer, titled “Interstate Bridge Replacement Program Cost Breakdown”, shows that a fully connected complete bridge should be about $2 Billion. It says:

The Replacement Bridge and Approaches cost estimate includes 100% of the cost of the bridge across the river (including shared use path and the transit share of the bridge structure), as well as bridge approaches and removal of the existing bridge.

And gives a cost range of $1.64 - $2.45 billion. By extending the existing bus rapid transit to the Expo Center, instead of the presumed, light rail element, the total cost would, almost certainly be under the TWO BILLION, an amount already allocated to the IBR by Oregon + Washington. This provides a bridge with ALL REQUIRED ELEMENTS (bike, pedestrian, automobile, and bus transit) that can be built with already allocated money WITHOUT TOLLS.

4. Tolls are not acceptable to most people.

One IBR chart shows peak period tolls at $4.70 per crossing which is $9.40 per day, or $2350/year for commuters. One CRC document says the tolls may be doubled if required for more money. That would be $4700/year just to get to work. Transit is not an option for most people because transit cannot reach most are jobs in under a one hour commute.

5. Light rail IS NOT REQUIRED TO MEET THE Purpose & Need.

The purpose and need statement does not mention light rail, only transit. Bus rapid transit is the ONLY RATIONAL choice since the transit component must serve Clark County and ONLY BRT already does this and does not require expansive park & ride buildings.

This project incorporates at least two outright LIES INTO ITS BASE ASSUMPTIONS (one implicit and one explicit).

1. Contrary of frequent claims of anti-car advocates, it is actually well proven that we can "build our way out of congestion"

One example is Tampa which added lanes and made a 30 minute trip into 10 minutes

"Prior to opening our express lanes, the average 10-mile trip in the morning peak-hour took over thirty minutes. Since we opened for interim operations, we have achieved a 50% split in the peak-hours between our new Reversible Express Lanes and our existing expressway lanes. This has resulted in a complete balancing of our traffic between our upper and lower lanes with no congestion for any of our customers and an average trip time of 10 minutes for the 10 miles for everyone. The express lanes are already handling enough traffic volume in our morning peak hours to equal having an extra lane constructed on our Interstate into downtown Tampa (about 2,000 per lane per hour)." Martin Stone, Ph.D., AICP Director of Planning Tampa-Hillsborough County Expressway Authority http://www.honolulutraffic.com/StoneTampa.pdf

2. There is ZERO evidence that cutting Oregon/Washington CO2 will have any measurable effect on climate.

This is because China & India are responsible for so much of the world CO2 emissions that states like Oregon & Washington's emissions are insignificant by comparison and thus will not have any detectable change. Further there is mounting evidence that CO2 has only a small effect on climate as recently found by Norway: Statistics Norway, the government agency that produces official statistics for that country, released a report last month titled "To what extent are temperature levels changing due to greenhouse gas emissions?" The report concludes:
"[T]he results imply that the effect of man-made CO2 emissions does not appear to be sufficiently strong to cause systematic changes in the pattern of the temperature fluctuations. In other words, our analysis indicates that with the current level of knowledge, it seems impossible to determine how much of the temperature increase is due to emissions of CO2."

From: https://www.powerlineblog.com/archives/2023/10/another-nail-in-the-global-warming-coffin.php

Thank You
Jim Karlock
[redacted]

IBR Draft SEIS - RECORD #2640 DETAIL

First Name :	jim
Last Name :	karlock
Attachments :	DSEIS-2640_karlock_Original.pdf (9 kb)

IBR Draft SEIS - RECORD #2640 DETAIL

Submission Date : 11/18/2024
First Name : jim
Last Name : karlock
Business/Organization/Agency :

Submission Input :

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1. It must have enough lanes to serve for the next 100 years.

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2. It must NOT TOWER OVER VANCOUVER 90 ft in the air.

The lowest cost will likely be a low level bascule bridge with river channel and railroad bridge changes to reduce number of lifts to a few per month.

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IBR flyer, titled “*Interstate Bridge Replacement Program Cost Breakdown”*, shows that a fully connected complete bridge should be about $2 Billion. It says:

* The Replacement Bridge and Approaches cost estimate includes 100% of the cost of the bridge across the river (including shared use path and the transit share of the bridge structure), as well as bridge approaches and removal of the existing bridge.*

And gives a cost range of $1.64 - $2.45 billion. By extending the existing bus rapid transit to the Expo Center, instead of the presumed, light rail element, the total cost would, almost certainly be under the TWO BILLION, an amount already allocated to the IBR by Oregon + Washington. This provides a bridge with ALL REQUIRED ELEMENTS (bike, pedestrian, automobile, and bus transit) that can be built with already allocated money WITHOUT TOLLS.

4. Tolls are not acceptable to most people.

One IBR chart shows peak period tolls at $4.70 per crossing which is $9.40

per day, or $2350/year for commuters. One CRC document says the tolls may be doubled if required for more money. That would be $4700/year just to get to work. Transit is not an option for most people because transit cannot reach most are jobs in under a one hour commute.

5. Light rail IS NOT REQUIRED TO MEET THE Purpose & Need.

The purpose and need statement does not mention light rail, only transit. Bus rapid transit is the ONLY RATIONAL choice since the transit component must serve Clark County and ONLY BRT already does this and does not require expansive park & ride buildings.

This project incorporates at least two outright LIES INTO ITS BASE ASSUMPTIONS (one implicit and one explicit).

1. Contrary of frequent claims of anti-car advocates, it is actually well proven that we can “build our way out of congestion”

One example is Tampa which added lanes and made a 30 minute trip into 10 minutes

“*Prior to opening our express lanes, the average 10-mile trip in the morning peak-hour took over thirty minutes. Since we opened for interim operations, we have achieved a 50% split in the peak-hours between our new Reversible Express Lanes and our existing expressway lanes. This has resulted in a complete balancing of our traffic between our upper and lower lanes with no congestion for any of our customers and an average trip time of 10 minutes for the 10 miles for everyone. The express lanes are already handling enough traffic volume in our morning peak hours to equal having an extra lane constructed on our Interstate into downtown Tampa (about 2,000 per lane per hour)*.” Martin Stone, Ph.D., AICP Director of Planning Tampa-Hillsborough County Expressway Authority http://www.honolulutraffic.com/StoneTampa.pdf

2. There is ZERO evidence that cutting Oregon/Washington CO2 will have any measurable effect on climate.

This is because China & India are responsible for so much of the world CO2 emissions that states like Oregon & Washington’s emissions are

insignificant by comparison and thus will not have any detectable change. Further there is mounting evidence that CO2 has only a small effect on climate as recently found by Norway:

Statistics Norway, the government agency that produces official statistics for that country, released a report last month titled “To what extent are temperature levels changing due to greenhouse gas emissions?” The report concludes:

“[T]he results imply that the effect of man-made CO2 emissions does not appear to be sufficiently strong to cause systematic changes in the pattern of the temperature fluctuations. In other words, our analysis indicates that with the current level of knowledge, it seems impossible to determine how much of the temperature increase is due to emissions of CO2.”

From:
https://www.powerlineblog.com/archives/2023/10/another-nail-in-the-global-warming-coffin.php

Thank You
Jim Karlock
[redacted]

IBR Draft SEIS - RECORD #2641 DETAIL

First Name :	Mark
Last Name :	McClure
Attachments :	125681_DSEIS2641_McClure_Original.pdf (571 kb) IMG_2982.jpeg (561 kb) 2641_Image.pdf (569 kb)

IBR Draft SEIS - RECORD #2641 DETAIL

Submission Date : 11/18/2024
First Name : Mark
Last Name : McClure
Business/Organization/Agency :

Submission Input :

First Name:
Mark

Last Name:
McClure

Email:
[redacted]

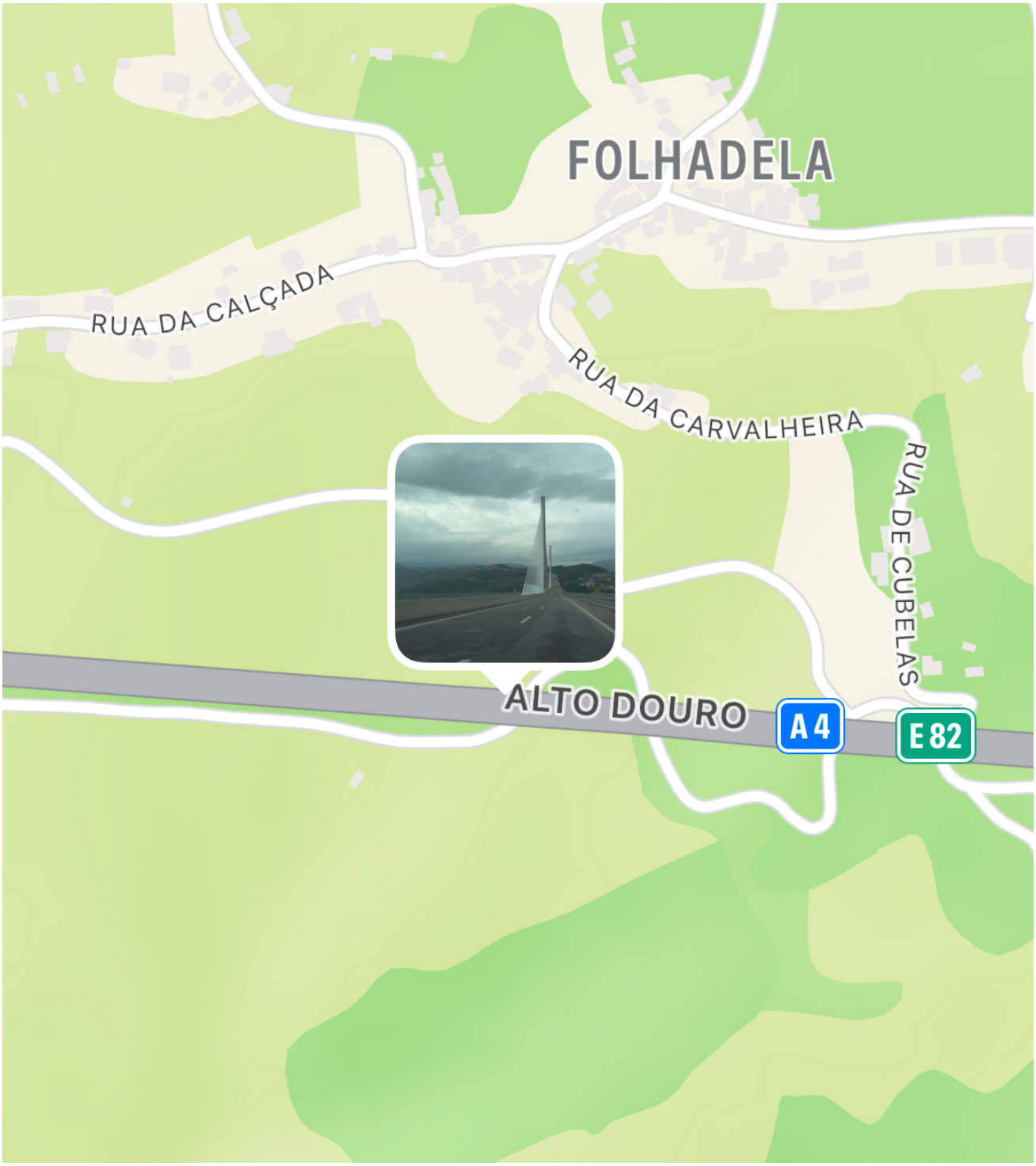
City:
Portland

Topic Area:
Transportation

Comment:
Quick note as I'm currently trekking and traveling in Portugal. As a Portland resident of 40 years and someone who worked in downtown Vancouver for 10 years, I came to know the Interstate Bridge very well. Long story short, I can't support the current IBR design. For an alternative approach, check out the bridge on the A4 in Portugal. I've attached a screenshot for reference—it's worth considering!

Attachment (maximum one):
IMG_2982.jpeg

JCA comment #: 646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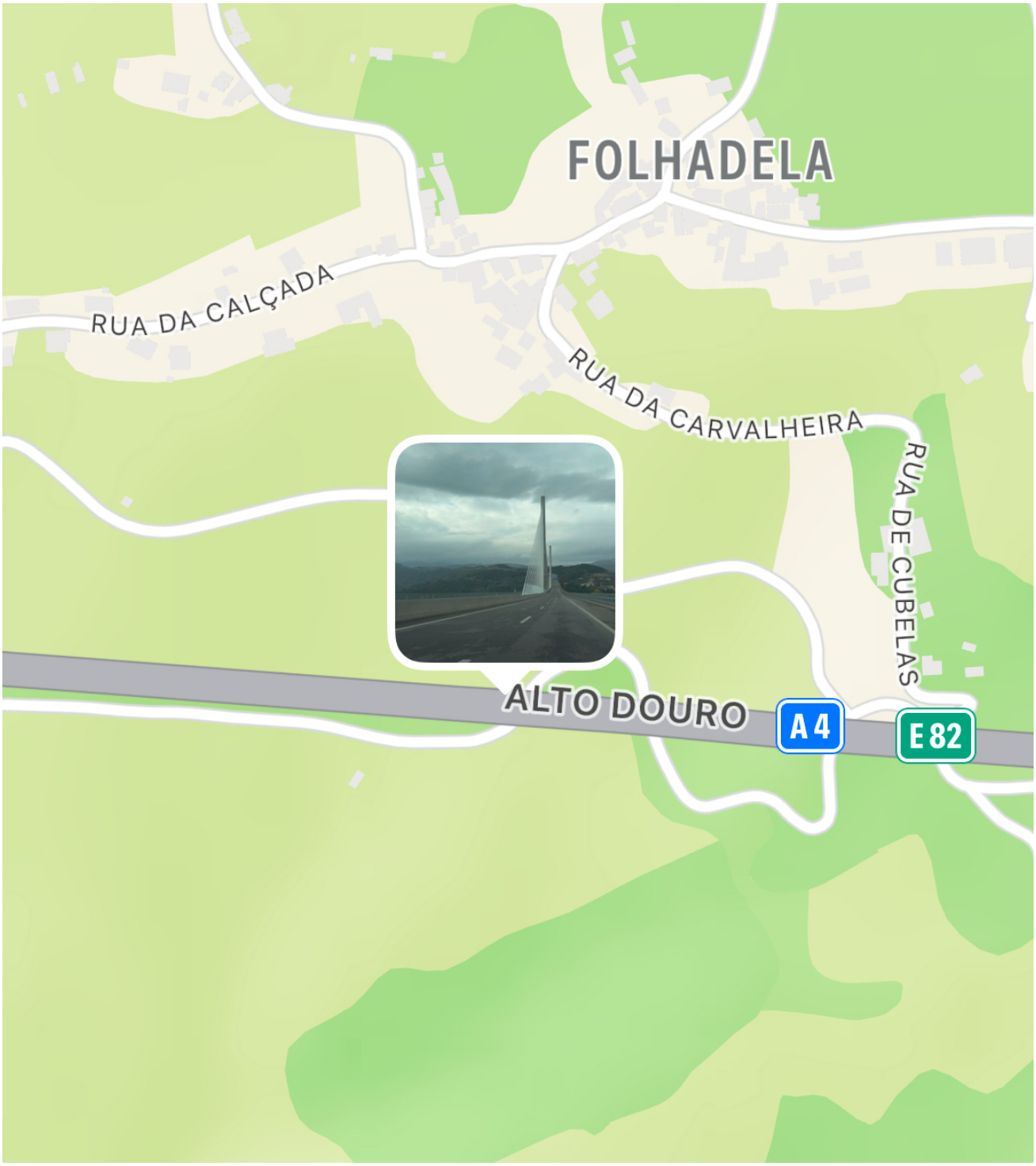
RUA DA CALÇADA
RUA DA CARVALHEIRA
RUA DE CUBELAS
ALTO DOURO
A4
E 82


FOLHADELA
RUA DA CALÇADA
RUA DA CARVALHEIRA
RUA DE CUBELAS
ALTO DOURO
A4
E 82

IBR Draft SEIS - RECORD #2642 DETAIL

First Name :	Georgena
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Attachments :	DSEIS-2642_Moran_Original.pdf (195 kb) Access For All_Formatted.pdf (197 kb)

IBR Draft SEIS - RECORD #2642 DETAIL

Submission Date :	11/18/2024
First Name :	Georgena
Last Name :	Moran
Business/Organization/Agency :	Access for All, LLC
Attachments :	DSEIS-2642_Moran_Original.pdf (363 kb) Access For All_Formatted.pdf (197 kb)

Submission Input :

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Georgena

Last Name:

Moran

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[redacted]

Email:

[redacted]

Phone:

[redacted]

City:

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US States:

[redacted]

Zip:

[redacted]

Topic Area:

Neighborhoods and Equity

Comment:
Access for All, LLC, led by people with disabilities, advocates for full inclusion for people of all abilities in projects and programs available to the greater community. We specialize in access to outdoor developed areas and our comments, in the attachment, reflect these missions.

In review of the Interstate Bridge Replacement Draft, we are primarily concerned with how the bridge design impacts the safety, connectivity, accessibility and user experience of people walking, using mobility devices and accessing transit.

Attachment (maximum one):
Access-for-All-LLC-Comments-on-Draft-SEIS-for-Interstate-Bridge.pdf

JCA comment #: 645

Access for All, LLC

November 18, 2024

Access for All, LLC Comments on Draft SEIS for Interstate Bridge

Access for All, LLC, led by people with disabilities, advocates for full inclusion for people of all abilities in projects and programs available to the greater community. We specialize in access to outdoor developed areas and our comments reflect these missions.

In review of the Interstate Bridge Replacement Draft, we are primarily concerned with how the bridge design impacts the safety, connectivity, accessibility and user experience of people walking, using mobility devices and accessing transit. The following are aspects of the draft SEIS that would significantly impact seniors (slow walkers) and people with disabilities, as well as have an effect on the experience for all users.

Trail access and the experience for people walking and using mobility devises: Safe connections and wayfinding to the existing and planned regional trails network on both sides of the river is critical.

- Extending the bridge project to the north to Highway 500 and Leverich Park would provide connectivity to park trails, such as Burnt River Creek Trail and the Vancouver Waterfront Path. This is important in promoting a safe and interconnected travel route.
- On the south side, the bridge design should extend to planned segments of the Marine Drive Path that would connect to other trails at Delta Park, and the Columbia Slough Path.
- In the design, there is an area that dips down to the waterfront, followed by a ½ mile ascent to the bridge with a 4.5% grade. This is extreme for some users that use assistive walking devices or seniors. Including a multiuse path at the bridge's grade from Evergreen to the river front would resolve this.
- Similarly, there is a 4.5% grade for a ½ mile from the Vancouver waterfront to access the multiuse bridge path. If the elevation of the multiuse path crossing the Columbia River cannot be lowered, then elevators should be added.
- Wayfinding signage and pavement markings to connect folks to trails, active transportation facilities and transit stops is important on both sides of the bridge.

To ensure safety and comfort: Bridge connections should adequately separate people walking, biking, and rolling from motor vehicles. Adequate lighting should be at bridge and approach pathways. Benches with companion seating at viewpoints or along paths, where possible, as well as covered areas for protection from heat or rain on the bridge can provide respite and enhance the enjoyment of the experience for all.

Georgena Moran
Access for All, LLC | Co-owner
[redacted]

Access for All, LLC

November 18, 2024

Access for All, LLC Comments on Draft SEIS for Interstate Bridge

Access for All, LLC, led by people with disabilities, advocates for full inclusion for people of all abilities in projects and programs available to the greater community. We specialize in access to outdoor developed areas and our comments reflect these missions.

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- On the south side, the bridge design should extend to planned segments of the Marine Drive Path that would connect to other trails at Delta Park, and the Columbia Slough Path.
- In the design, there is an area that dips down to the waterfront, followed by a ½ mile ascent to the bridge with a 4.5% grade. This is extreme for some users that use assistive walking devices or seniors. Including a multiuse path at the bridge's grade from Evergreen to the river front would resolve this.
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Georgena Moran
Access for All, LLC | Co-owner
georgena@a4allc.org

IBR Draft SEIS - RECORD #2643 DETAIL

First Name :	Mark
Last Name :	Fischer
Attachments :	DSEIS-2643_Fischer_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #2643 DETAIL

Submission Date : 11/18/2024
First Name : Mark
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[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
I would like to register my firm opposition to the Interstate Bridge Replacement project for a number of reasons, any one of which should give pause to planners of a project of this magnitude.
The cost burden is absurdly high, and given the time projections for completion of the project, will probably grow much higher by the year 2040, not to mention the enormous toll burden this would place on the thousands of daily commuters essentially indentured to using the bridge daily.

The structure doesn’t meet seismic standards necessary to withstand the major earthquake virtually every expert has told us is bound to happen, sooner or later.
The enormous height of the project, aside from being an incredible eyesore, doesn’t even provide the same clearances that are currently available for commerce designed and constructed well over 100 years ago.
Hayden Island and its thousands of residents seems to be a sacrificial lamb in terms of land use, with access and neighborhood livability an afterthought at best.
The project won’t even meet the desired goals in terms of traffic congestion alleviation in the corridor.
How is it that the enormous cost of planning over what has now consumed at least two decades has nothing more to show than this bloated, underthought and ugly monument to current American problem solving? I have long been in support of replacing the aging and no doubt fragile relic we now use but this project is a severe disappointment and disservice to the community and taxpayers at large.
Sincerely, Mark Fischer

JCA comment #: 644

IBR Draft SEIS - RECORD #2644 DETAIL

First Name :	Corinn
Last Name :	Castro
Attachments :	DSEIS-2644_Castro_Original.pdf (1 mb) I5bridgepurposeandneedstatement.pdf (1 mb)

IBR Draft SEIS - RECORD #2644 DETAIL

Submission Date :	11/18/2024
First Name :	Corinn
Last Name :	Castro
Business/Organization/Agency :	
Attachments :	I5bridgepurposeandneedstatement.pdf (1 mb)

Submission Input :

First Name:
Corinn

Last Name:
Castro

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
I support bridge replacement, but not the costly IBRP designs that clearly does not meet it's stated purpose and need.

A refresher on purpose and need:
a) improve travel safety and traffic operations on the I-5 river crossing and associated interchanges; (b) improve connectivity, reliability, travel times, and operations of public transportation modal alternatives in the Program area; (c) improve highway freight mobility and address interstate travel and commerce needs in the Program area; and (d) improve the I-5 river crossing's structural integrity (seismic stability).

(See attached for full document)
1. The $7-12 billion cost is outrageous, while doing little to solve I-5 traffic congestion at the I-5 bridge.
2. The massive bridge will inevitably experience massive cost overruns, causing a redirection of funding meant for social programs.
3. Bridge tolls will impose a heavy and daily financial burden on all adjacent communities.
4. IBR's fixed-spans offer only 116 feet of vertical clearance above water, a full 62 ft less than today's drawbridge which will significantly restrict larger commercial vessels from using the Columbia River to support upstream communities.
5. The 175 ft bridge height will be an eyesore that will detract from the current scenic beauty of the crossing.
6. Per the committee, IBR bridge plans will not be engineered to withstand a major Cascade Seduction Zone earthquake! Scientists are currently predicting there is about a 37% chance that a mega-thrust earthquake in this fault zone will occur in the next 50 years.
7. The IBR is an area where ground liquefaction is "expected" during a major earthquake. Liquefaction is a major threat to any bridge.
8. The Delta Park 30ft high 1/4 mile corkscrew bike & pedestrian access ramp, is too long & steep for the general public.
9. At 100ft above ground, the Vancouver transit station will be a long reach as elevator outages do happen.
10. At 30ft above ground, the Hayden Island transit station will also be a long reach subject to periodic elevator outages.
11. The 18-lane interchange planned for Hayden Island will create a very wide ugly swath of multiple pavement lanes across prime retail property, and a navigational nightmare for the visiting public and islanders.
12. The bridge's 15-year construction period will create a huge loss of quality of life, income, & property values for Hayden Island and adjacent communities.
13. Insist on an additional 120 days for public review & comment, given IBR's refusal to release full bridge information.
14. An "Independent Engineering Commission" should investigate & evaluate the option of more suitable, far less costly, and considerably more environmentally friendly "Immersed Tunnel!" If it was selected for a similar project in Vancouver BC, then why not here?

Attachment (maximum one):
I5-bridge-purpose-and-need-statement-.pdf

JCA comment #: 643

1. PURPOSE AND NEED

This chapter describes the primary purpose for the Interstate Bridge Replacement Program.

1.1 Importance of the I-5 Corridor and the Interstate Bridge

As the only continuous north-south interstate route on the West Coast of the United States connecting the Canadian and Mexican borders, Interstate 5 (I-5) is vital to the local, regional, state, and national economies. At the Columbia River, I-5 provides a critical economic connection to two major ports, deepwater shipping, upriver barging, two transcontinental rail lines, and much of the region's industrial land. Truck-hauled freight movement over the I-5 Columbia River crossing is critical for industrial centers, for employment, and for the regional and national economies.

The Interstate Bridge provides the primary transportation link between Vancouver, Washington, and Portland, Oregon, and it is the only direct connection between the downtown areas of these cities. Residents of Vancouver and Portland drive, ride buses, bicycle, and walk across the Interstate Bridge for work, recreation, shopping, and entertainment. In 2019,[1] 144,000 trips were taken over the bridge each weekday by car, transit, bicycle, and walking. The Interstate 205 (I-205) Glenn Jackson Bridge, about 6 miles east, is the only other crossing over the Columbia River within the Portland-Vancouver metropolitan area. I-205 provides important connectivity for the region—particularly eastside suburban areas—but provides a less direct link between the downtown hubs in Portland and Vancouver.

Chapter Contents

1.2 Confirming the I-5 Columbia River Crossing Project's Purpose and Need

The Interstate Bridge Replacement (IBR) Program is a renewal of the previously suspended Columbia River Crossing (CRC) project, which completed the National Environmental Policy Act (NEPA) process with a signed Record of Decision (ROD) in 2011 and two re-evaluations in 2012 and 2013 . Numerous studies conducted for the CRC project and past planning studies in this section of I-5 (see Figure 1-1), identified a variety of transportation mobility and safety problems. For additional details on these studies and their findings, please see Section 1.2 of the *Interstate 5 Columbia River Crossing Project Final Environmental Impact Statement and Final Section 4(f) Evaluation* (CRC 2011a).

[1] 2019 is used as the baseline year for most of the existing conditions data because it provides a more accurate baseline than more recent years for forecasts, which are based on historical trends observed over a long period of time rather than short-term phenomena such as the COVID-19 pandemic or the rise in gas prices in mid-2022.

The Purpose and Need statement for the CRC project was developed by the CRC Task Force[2] and the joint lead agencies.[3] Please see Chapter 1 of the CRC project Final Environmental Impact Statement (EIS) to learn more about how the Purpose and Need was developed and about agency and public input (CRC 2011a). As part of the NEPA process, the IBR Program began working with regional and local partner agencies and the public in early 2021 to review the Purpose and Need that was adopted for the CRC project. The IBR Program brought the Purpose and Need, as well as the Vision and Values (identified in Section 1.5), to partner agencies[4] and the Program's three advisory groups[5] to discuss the transportation needs identified for the CRC project. These transportation needs were also brought to the public for comment during an online open house, virtual community briefings, and an online survey.

In mid-2021, the IBR Program announced that these efforts confirmed that the six transportation needs identified in the CRC Purpose and Need statement still exist today, and that the values identified in the Vision and Values document remain community values. This was documented in a third NEPA re-evaluation (IBR 2021b) that was prepared in 2021 to evaluate the effect of changes in conditions and regulations since 2013, as well as potential design changes. **Thus, the Purpose and Need statement for the IBR Program, provided below, remains the same as documented in the 2011 Final EIS and 2011 ROD for the CRC project.** Please see the 2021 Community Engagement Summary Report (IBR 2021a) and the NEPA re-evaluation (IBR 2021b) for additional details on how community partner outreach and public engagement helped confirm the Purpose and Need statement.

Figure 1-1. Program Vicinity

[2] The CRC Task Force was a 39-member group formed in 2005 that was composed of leaders representing a broad cross section of Washington and Oregon communities. Public agencies, businesses, civic organizations, neighborhoods, and freight, commuter, and environmental groups were represented on the task force. The group met 23 times over the course of the CRC project development phase to advise the project team and provide guidance and recommendations at key decision points. The task force concluded its work in summer 2008 after making its recommendation on the Locally Preferred Alternative.

[3] The joint lead agencies for the CRC project were the Federal Highway Administration (FHWA), Federal Transit Administration (FTA), Oregon Department of Transportation (ODOT), Washington State Department of Transportation (WSDOT), Oregon Metro (Metro), Southwest Washington Regional Transportation Council (RTC), Tri-County Metropolitan Transportation District (TriMet), and Clark County Public Transportation Benefit Area (C-TRAN).

[4] C-TRAN, TriMet, Metro, RTC, the Cities of Portland and Vancouver, and the Ports of Portland and Vancouver.

[5] The Executive Steering Group, Community Advisory Group, and Equity Advisory Group. The advisory groups are detailed in Chapter 6 of this Draft Supplemental EIS (SEIS).

1.3 Purpose and Need for the IBR Program

One of the first and most important steps of any major project is to define why the project has been initiated and what problem(s) it seeks to address. The Purpose and Need statement provides this definition for projects complying with NEPA and serves as the basis for defining how project alternatives will be developed and evaluated. A reasonable alternative must address the needs specified in the Purpose and Need statement for the alternative to be considered in an EIS; thus, the Purpose and Need is an influential statement that guides future development of the project.

The Purpose and Need statement for the IBR Program, developed by the lead agencies, project sponsors, and CRC Task Force, can be found in Sections 1.3.1 and 1.3.2. The text of the Purpose and Need has not been edited from its original wording, with the exception of references to the name of the Program. More recent data and supplemental information are provided in sidebars and footnotes.[6]

Note to reviewers: The IBR Program cannot change the original wording of the Purpose and Need statement, with the exception of the project name. Any clarifications or updated information must be provided in sidebars or footnotes.

1.3.1 Program Purpose

The purpose of the proposed action is to improve I-5 corridor mobility by addressing present and future travel demand and mobility needs in the Program area. The Program area extends from approximately Columbia Boulevard in the south to State Route (SR) 500 in the north (Figure 1-1).[7] Relative to the No-Build Alternative, the proposed action is intended to achieve the following objectives: (a) improve travel safety and traffic operations on the I-5 river crossing and associated interchanges; (b) improve connectivity, reliability, travel times, and operations of public transportation modal alternatives in the Program area; (c) improve highway freight mobility and address interstate travel and commerce needs in the Program area; and (d) improve the I-5 river crossing's structural integrity (seismic stability).

[6] Transportation data provided in the sidebars are from the IBR Program Transportation Technical Report. 2019 is used as the baseline year for most data as it provides a more accurate baseline for forecasts, which are based on historical trends observed over a long period of time rather than short-term phenomena such as the COVID-19 pandemic or the rise in gas prices in mid-2022. Separate FTA Capital Investment Grant requirements for updated data using 2022 or 2023 are in process and will be incorporated between the Draft and Final SEIS.

[7] Traffic conditions on the Interstate Bridge are influenced by the 5-mile section of I-5 between SR 500/39th Street in Vancouver and Columbia Boulevard in Portland. The southern terminus of IBR's proposed improvements is just south of Interstate/Victory Boulevard, which is similar to the improvements identified in the CRC LPA.

1.3.2 Program Needs

The specific needs to be addressed by the proposed action include:

- **Growing travel demand and congestion:** Existing travel demand exceeds capacity on the Interstate Bridge and associated interchanges. This corridor experiences heavy congestion and delay lasting 4 to 6 hours daily[8] during the morning and afternoon peak travel periods and when traffic crashes, vehicle breakdowns, or bridge lifts occur. Due to excess travel demand and congestion in the I-5 corridor, many trips take the longer, alternative I-205 route across the river. Spillover traffic from I-5 onto parallel arterials such as Martin Luther King Jr. Boulevard and Interstate Avenue increases local congestion. In 2005, the two crossings[9] carried 280,000 vehicle trips across the Columbia River daily. Daily traffic demand over the Interstate Bridge is projected to increase by more than 35 percent during the next 20 years, with stop-and-go conditions increasing to approximately 15 hours daily if no improvements are made.
- **Impaired freight movement:** I-5 is part of the National Truck Network, and the most important freight highway on the West Coast, linking international, national, and regional markets in Canada, Mexico, and the Pacific Rim with destinations throughout the western United States. In the center of the Program area, I-5 intersects with the Columbia River's deep water shipping and barging channels, as well as two river-level, transcontinental rail lines. The Interstate Bridge provides direct and important highway connections to the Port of Vancouver and Port of Portland facilities located on the Columbia River, as well as the majority of the area's freight consolidation facilities and distribution terminals. Freight volumes moved by truck to and from the area are projected to more than double over the next 25 years. Vehicle-hours of delay on truck routes in the Portland-Vancouver area are projected to increase by more than 90 percent over the next 20 years. Growing demand and congestion will result in increasing delay, costs, and uncertainty for all businesses that rely on this corridor for freight movement.

In 2005, 280,000 vehicle trips crossed the Columbia River daily (northbound and southbound) in the Portland-Vancouver metropolitan region, of which 134,000 used the Interstate Bridge. By 2019, the total number of vehicle trips that crossed the Columbia River had increased to 313,000 per day, of which 143,400 used the Interstate Bridge.

Vehicle trips include those made in single-occupancy vehicles, high-occupancy vehicles, trucks, and transit vehicles (buses).

The duration of congestion on the Interstate Bridge has roughly doubled from 2005 to 2019. In 2019, the I-5 corridor experienced heavy congestion and delay in both directions lasting up to almost 12 daily (compared with 4 to 6 hours daily in 2005).

Daily traffic demand over the I-5 Interstate Bridge is projected to increase by more than 25% by 2045.

In 2005, the Interstate Bridge and its approach sections experienced crash rates more than two times higher than statewide averages for comparable facilities. As of 2019, crash rates are three times higher than average. Crashes in the IBR Program area could increase by over 50% by 2045 if no improvements are made.

There were seven fatal crashes in the Program area between 2015 and 2019.

[8] The hours of congestion and delay refers to the total number of hours that the corridor experiences congestion. The IBR Program has defined congestion as speeds below 45 miles per hour per ODOT's definition of highway congestion. ODOT is coordinating this updated congestion definition with WSDOT.

[9] The two crossings are the I-5 Interstate Bridge and the I-205 Glenn Jackson Bridge.

- **Limited public transportation operation, connectivity, and reliability:** Due to limited public transportation options, a number of transportation markets are not well served. The key transit markets include trips between Portland Central City and the city of Vancouver and Clark County, trips between north/northeast Portland and the city of Vancouver and Clark County, and trips connecting the city of Vancouver and Clark County with the regional transit system in Oregon. Current congestion in the corridor adversely impacts public transportation service reliability and travel speed. Southbound bus travel times across the bridge are currently up to three times longer during parts of the AM peak compared to off-peak. Travel times for public transit using general purpose lanes on I-5 in the Program area are expected to increase substantially by 2030.

In 2019, more than 14,000 freight trips carrying over $132 million in commodities traveled across the I-5 Interstate Bridge each weekday. Freight volumes moved by truck to and from the area are projected to more than double by 2045.

Deficiencies such as narrow lanes and shoulders, as well as short merging, diverging, and weaving distances, reduce the efficiency and safety of freight truck movement.

In 2005, southbound bus travel times across the bridges were up to three times longer during parts of the AM peak (i.e., morning high traffic period) than during off-peak times. As of 2019, bus travel times are four times longer during the AM peak.

If the bridges are not replaced, travel times for public transit using general-purpose lanes on I-5 in the Program area are expected to increase by 50% by 2045 as a result of increased congestion.

- **Safety and vulnerability to incidents:** The Interstate Bridge and its approach sections experience crash rates more than two times higher than statewide averages for comparable facilities. Incident evaluations generally attribute these crashes to traffic congestion and weaving movements associated with closely spaced interchanges and short merge distances. Without breakdown lanes or shoulders, even minor traffic accidents or stalls cause severe delay or more serious accidents (Figure 1-2).

Figure 1-2. Crash Blocking the Interstate Bridge

- **Substandard bicycle and pedestrian facilities:** The bicycle/pedestrian lanes on the Interstate Bridge are about 3.5 to 4 feet wide, narrower than the 10-foot standard, and are located extremely close to traffic lanes, thus impacting safety for pedestrians and bicyclists (Figure 1-3). Direct pedestrian and bicycle connectivity are poor in the Program area.

Figure 1-3. Bicycle and Pedestrian Path on the Interstate Bridge

Compliance with the Americans with Disabilities Act (ADA) varies for the existing shared-use paths. The paths comply with the maximum gradient (4.7%), and there are no objects that overhang or protrude into the path. However, the paths do not comply with guidelines for curb ramps (both in number and design), width, passing spaces, cross slope, or railing height (FHWA 2001; U.S. Access Board 2013). The paths are also in close proximity to traffic lanes; this increases bicyclist and pedestrian exposure to vehicular traffic, noise, and emissions.

- **Seismic vulnerability:** The existing Interstate Bridge is located in a seismically active zone. It does not meet current seismic standards and is vulnerable to failure in an earthquake.

The existing bridges were designed before modern seismic design codes were established. The foundations are likely to displace during a strong earthquake, resulting in the collapse of the bridge spans into the river. In addition, the movable span lift towers would be overstressed due to the inertia of the concrete counterweights and would collapse onto the bridge, causing the adjacent spans to fail. This collapse potential is due to the fact that hundreds of timber bridge support piles sit within loose sand that can liquefy during an earthquake.

All new federally funded highway bridges are required to be designed to the current edition of the AASHTO Guide Specifications for LRFD Seismic Bridge Design (AASHTO 2022). In addition, State Departments of Transportation (DOTs) typically adopt local practices to address potential geologic hazards in the region (e.g., the Cascadia Subduction Zone). State DOTs may also prescribe elevated levels of seismic performance based on the importance of the structure as it relates to public safety, national defense, and economic investment, as is the case for the Interstate Bridge.

1.4 Compliance with NEPA Regulations

The notice to prepare a Supplemental EIS (SEIS) was published in the Federal Register on April 5, 2023, and formally reopened the NEPA process that previously concluded with the 2011 ROD (CRC 2011b) and NEPA re-evaluations prepared in 2012 and 2013 (CRC 2012, 2013). Per the requirements of 23 Code of Regulations (CFR) 771.130(a), the Federal Highway Administration (FHWA) and Federal Transit Administration (FTA) concluded that an SEIS was necessary based on a 2021 NEPA re-evaluation that considered changes to existing conditions, regulations, policies, and potential design modifications to the CRC Locally Preferred Alternative (LPA) (IBR 2021b). The LPA, as selected in the 2011 ROD and revised as documented in the 2012 and 2013 re-evaluations, included replacing the existing Interstate Bridge with two stacked, fixed-span bridges over the Columbia River; the bridges would include dedicated space for light-rail transit and a shared-use path, among other improvements.

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Cooperating agencies, participating agencies, participating tribes, and the public have been given multiple opportunities for formal comment on several important elements of this Program. These opportunities are described in Appendix A, Agency and Tribal Coordination, and Appendix B, Public Involvement. For the formal comment opportunities provided during the CRC project, please see Chapter 1 of the CRC Final EIS.

1.5 Vision and Values

During the CRC project, the joint lead agencies, with the help and recommendation of the CRC Task Force, developed a vision for how to address the Purpose and Need and the values they would follow in doing so. As previously noted, the values identified in the CRC Vision and Values statement remain community values. **Thus, the Vision and Values statement for the IBR Program, provided below, remains the same as documented in the 2011 Final EIS and 2011 ROD for the CRC project.**

The text of the Vision and Values statement has not been edited from its original wording, with the exception of references to the name of the Program.

These values, along with the Purpose and Need, were instrumental in defining the evaluation criteria used during the development of the range of alternatives evaluated in the CRC project's EIS (see Sections 2.6 through 2.8 of the CRC Final EIS for information on this process).

As with the Purpose and Need, the IBR Program worked with regional and local partner agencies and the public to review and comment on the Vision and Values. Opportunities for the public to comment included an online open house, virtual community briefings, and an online survey.[10] The outcome of these efforts was the confirmation that the Vision and Values listed below remain community values.

The following is a statement of the IBR Program vision:

> *The Interstate Bridge Replacement (IBR) Program Vision provides the foundation for developing criteria and performance measures that will be used to evaluate the IBR Program alternatives. The IBR Program NEPA process will include consideration of crossing infrastructure; multimodal transportation; connectivity; high-capacity transit; land use;*

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funding; community and business interests; under-represented, low income, and minority communities; commuter and freight mobility; maritime mobility; and the environment.

Values that have guided this Program's development and framed identification and evaluation of alternatives are noted below.

1.5.1 Community Livability

- Supporting a healthy community.
- Supporting a healthy and vibrant mix of residential, commercial, industrial, recreational, cultural, and historic areas land uses.
- Supporting aesthetic quality that achieves the level of a regional landmark.
- Recognizing the history of the community surrounding the Program area, supporting improved community cohesion, and avoiding neighborhood disruption.
- Preserving parks, historic and cultural resources, and green spaces.

1.5.2 Mobility, Reliability, Accessibility, Congestion Reduction, and Efficiency

- Providing congestion reduction and mobility, reliability, and accessibility for all users, and recognizing the requirements of local, intra-corridor, and interstate movement now and in the future.
- Providing an efficient transportation system through transportation system management, encouraging reduced reliance on single-occupancy vehicles, improving incident management, and providing increased capacity measures.

Reliability refers to consistency or dependability in travel times as measured from day to day and/or across different times of the day.

Mobility refers to the ability to easily move between different locations.

Modal refers to the various methods (or modes) of transportation such as motor vehicle, transit, walking, cycling, rolling, or other means.

1.5.3 Modal Choice

- Providing modal choice for users of the river crossing including highway, transit, high-capacity transit, bicycle, and pedestrian modes.

1.5.4 Safety

- Ensuring safety for vehicles (trucks, cars, emergency, and transit), pedestrians, bicyclists, river users, and air traffic at the crossing.

1.5.5 Regional Economy and Freight Mobility

- Supporting a sound regional economy and job growth.
- Enhancing the I-5 corridor as a global trade gateway by addressing the need to move freight efficiently and reliably through the Program area, and allowing for river navigational needs.

1.5.6 Stewardship of Natural and Human Resources

- Respecting, protecting, and improving natural resources including fish, wildlife habitat, and water quality.
- Supporting improved air quality.

- Minimizing impacts of noise, light, and glare.
- Supporting energy efficiency through design, construction, and use.

1.5.7 Distribution of Impacts and Benefits

- Ensuring the fair distribution of benefits and adverse effects of the Program for the region, communities, and neighborhoods adjacent to the Program area.

1.5.8 Cost-Effectiveness and Financial Resources

- Ensuring cost-effectiveness in design, construction, maintenance, and operation.
- Ensuring a reliable funding plan for the Program.

1.5.9 Bi-State Cooperation

- Fostering regional cooperation and planning.
- Supporting existing growth management plans in both states.
- Supporting balanced job growth.

1.6 Next Steps

The community will have an opportunity to review this Draft SEIS and provide feedback during the public review and comment period (dates will be added when known). The design of the proposed improvements, including the selection of specific design options, may be further refined based on findings and public input, which will be documented in the Final SEIS and an Amended ROD issued by FHWA and FTA. The design of the Modified LPA will be developed to a level of detail that will allow the IBR Program to apply for permits and update cost estimates. The IBR Program will continue to work and foster relationships with agencies, tribes, and the public through completion of the Program.

1. PURPOSE AND NEED

This chapter describes the primary purpose for the Interstate Bridge Replacement Program.

1.1 Importance of the I-5 Corridor and the Interstate Bridge

As the only continuous north-south interstate route on the West Coast of the United States connecting the Canadian and Mexican borders, Interstate 5 (I-5) is vital to the local, regional, state, and national economies. At the Columbia River, I-5 provides a critical economic connection to two major ports, deepwater shipping, upriver barging, two transcontinental rail lines, and much of the region's industrial land. Truck-hauled freight movement over the I-5 Columbia River crossing is critical for industrial centers, for employment, and for the regional and national economies.

The Interstate Bridge provides the primary transportation link between Vancouver, Washington, and Portland, Oregon, and it is the only direct connection between the downtown areas of these cities. Residents of Vancouver and Portland drive, ride buses, bicycle, and walk across the Interstate Bridge for work, recreation, shopping, and entertainment. In 2019,[1] 144,000 trips were taken over the bridge each weekday by car, transit, bicycle, and walking. The Interstate 205 (I-205) Glenn Jackson Bridge, about 6 miles east, is the only other crossing over the Columbia River within the Portland-Vancouver metropolitan area. I-205 provides important connectivity for the region—particularly eastside suburban areas—but provides a less direct link between the downtown hubs in Portland and Vancouver.

Chapter Contents

1.2 Confirming the I-5 Columbia River Crossing Project's Purpose and Need

The Interstate Bridge Replacement (IBR) Program is a renewal of the previously suspended Columbia River Crossing (CRC) project, which completed the National Environmental Policy Act (NEPA) process with a signed Record of Decision (ROD) in 2011 and two re-evaluations in 2012 and 2013 . Numerous studies conducted for the CRC project and past planning studies in this section of I-5 (see Figure 1-1), identified a variety of transportation mobility and safety problems. For additional details on these studies and their findings, please see Section 1.2 of the *Interstate 5 Columbia River Crossing Project Final Environmental Impact Statement and Final Section 4(f) Evaluation* (CRC 2011a).

[1] 2019 is used as the baseline year for most of the existing conditions data because it provides a more accurate baseline than more recent years for forecasts, which are based on historical trends observed over a long period of time rather than short-term phenomena such as the COVID-19 pandemic or the rise in gas prices in mid-2022.

The Purpose and Need statement for the CRC project was developed by the CRC Task Force[2] and the joint lead agencies.[3] Please see Chapter 1 of the CRC project Final Environmental Impact Statement (EIS) to learn more about how the Purpose and Need was developed and about agency and public input (CRC 2011a). As part of the NEPA process, the IBR Program began working with regional and local partner agencies and the public in early 2021 to review the Purpose and Need that was adopted for the CRC project. The IBR Program brought the Purpose and Need, as well as the Vision and Values (identified in Section 1.5), to partner agencies[4] and the Program's three advisory groups[5] to discuss the transportation needs identified for the CRC project. These transportation needs were also brought to the public for comment during an online open house, virtual community briefings, and an online survey.

In mid-2021, the IBR Program announced that these efforts confirmed that the six transportation needs identified in the CRC Purpose and Need statement still exist today, and that the values identified in the Vision and Values document remain community values. This was documented in a third NEPA re-evaluation (IBR 2021b) that was prepared in 2021 to evaluate the effect of changes in conditions and regulations since 2013, as well as potential design changes. **Thus, the Purpose and Need statement for the IBR Program, provided below, remains the same as documented in the 2011 Final EIS and 2011 ROD for the CRC project.** Please see the 2021 Community Engagement Summary Report (IBR 2021a) and the NEPA re-evaluation (IBR 2021b) for additional details on how community partner outreach and public engagement helped confirm the Purpose and Need statement.

Figure 1-1. Program Vicinity

[2] The CRC Task Force was a 39-member group formed in 2005 that was composed of leaders representing a broad cross section of Washington and Oregon communities. Public agencies, businesses, civic organizations, neighborhoods, and freight, commuter, and environmental groups were represented on the task force. The group met 23 times over the course of the CRC project development phase to advise the project team and provide guidance and recommendations at key decision points. The task force concluded its work in summer 2008 after making its recommendation on the Locally Preferred Alternative.

[3] The joint lead agencies for the CRC project were the Federal Highway Administration (FHWA), Federal Transit Administration (FTA), Oregon Department of Transportation (ODOT), Washington State Department of Transportation (WSDOT), Oregon Metro (Metro), Southwest Washington Regional Transportation Council (RTC), Tri-County Metropolitan Transportation District (TriMet), and Clark County Public Transportation Benefit Area (C-TRAN).

[4] C-TRAN, TriMet, Metro, RTC, the Cities of Portland and Vancouver, and the Ports of Portland and Vancouver.

[5] The Executive Steering Group, Community Advisory Group, and Equity Advisory Group. The advisory groups are detailed in Chapter 6 of this Draft Supplemental EIS (SEIS).

1.3 Purpose and Need for the IBR Program

One of the first and most important steps of any major project is to define why the project has been initiated and what problem(s) it seeks to address. The Purpose and Need statement provides this definition for projects complying with NEPA and serves as the basis for defining how project alternatives will be developed and evaluated. A reasonable alternative must address the needs specified in the Purpose and Need statement for the alternative to be considered in an EIS; thus, the Purpose and Need is an influential statement that guides future development of the project.

The Purpose and Need statement for the IBR Program, developed by the lead agencies, project sponsors, and CRC Task Force, can be found in Sections 1.3.1 and 1.3.2. The text of the Purpose and Need has not been edited from its original wording, with the exception of references to the name of the Program. More recent data and supplemental information are provided in sidebars and footnotes.[6]

Note to reviewers: The IBR Program cannot change the original wording of the Purpose and Need statement, with the exception of the project name. Any clarifications or updated information must be provided in sidebars or footnotes.

1.3.1 Program Purpose

The purpose of the proposed action is to improve I-5 corridor mobility by addressing present and future travel demand and mobility needs in the Program area. The Program area extends from approximately Columbia Boulevard in the south to State Route (SR) 500 in the north (Figure 1-1).[7] Relative to the No-Build Alternative, the proposed action is intended to achieve the following objectives: (a) improve travel safety and traffic operations on the I-5 river crossing and associated interchanges; (b) improve connectivity, reliability, travel times, and operations of public transportation modal alternatives in the Program area; (c) improve highway freight mobility and address interstate travel and commerce needs in the Program area; and (d) improve the I-5 river crossing's structural integrity (seismic stability).

[6] Transportation data provided in the sidebars are from the IBR Program Transportation Technical Report. 2019 is used as the baseline year for most data as it provides a more accurate baseline for forecasts, which are based on historical trends observed over a long period of time rather than short-term phenomena such as the COVID-19 pandemic or the rise in gas prices in mid-2022. Separate FTA Capital Investment Grant requirements for updated data using 2022 or 2023 are in process and will be incorporated between the Draft and Final SEIS.

[7] Traffic conditions on the Interstate Bridge are influenced by the 5-mile section of I-5 between SR 500/39th Street in Vancouver and Columbia Boulevard in Portland. The southern terminus of IBR's proposed improvements is just south of Interstate/Victory Boulevard, which is similar to the improvements identified in the CRC LPA.

1.3.2 Program Needs

The specific needs to be addressed by the proposed action include:

- **Growing travel demand and congestion:** Existing travel demand exceeds capacity on the Interstate Bridge and associated interchanges. This corridor experiences heavy congestion and delay lasting 4 to 6 hours daily[8] during the morning and afternoon peak travel periods and when traffic crashes, vehicle breakdowns, or bridge lifts occur. Due to excess travel demand and congestion in the I-5 corridor, many trips take the longer, alternative I-205 route across the river. Spillover traffic from I-5 onto parallel arterials such as Martin Luther King Jr. Boulevard and Interstate Avenue increases local congestion. In 2005, the two crossings[9] carried 280,000 vehicle trips across the Columbia River daily. Daily traffic demand over the Interstate Bridge is projected to increase by more than 35 percent during the next 20 years, with stop-and-go conditions increasing to approximately 15 hours daily if no improvements are made.
- **Impaired freight movement:** I-5 is part of the National Truck Network, and the most important freight highway on the West Coast, linking international, national, and regional markets in Canada, Mexico, and the Pacific Rim with destinations throughout the western United States. In the center of the Program area, I-5 intersects with the Columbia River's deep water shipping and barging channels, as well as two river-level, transcontinental rail lines. The Interstate Bridge provides direct and important highway connections to the Port of Vancouver and Port of Portland facilities located on the Columbia River, as well as the majority of the area's freight consolidation facilities and distribution terminals. Freight volumes moved by truck to and from the area are projected to more than double over the next 25 years. Vehicle-hours of delay on truck routes in the Portland-Vancouver area are projected to increase by more than 90 percent over the next 20 years. Growing demand and congestion will result in increasing delay, costs, and uncertainty for all businesses that rely on this corridor for freight movement.

In 2005, 280,000 vehicle trips crossed the Columbia River daily (northbound and southbound) in the Portland-Vancouver metropolitan region, of which 134,000 used the Interstate Bridge. By 2019, the total number of vehicle trips that crossed the Columbia River had increased to 313,000 per day, of which 143,400 used the Interstate Bridge.

Vehicle trips include those made in single-occupancy vehicles, high-occupancy vehicles, trucks, and transit vehicles (buses).

The duration of congestion on the Interstate Bridge has roughly doubled from 2005 to 2019. In 2019, the I-5 corridor experienced heavy congestion and delay in both directions lasting up to almost 12 daily (compared with 4 to 6 hours daily in 2005).

Daily traffic demand over the I-5 Interstate Bridge is projected to increase by more than 25% by 2045.

In 2005, the Interstate Bridge and its approach sections experienced crash rates more than two times higher than statewide averages for comparable facilities. As of 2019, crash rates are three times higher than average. Crashes in the IBR Program area could increase by over 50% by 2045 if no improvements are made.

There were seven fatal crashes in the Program area between 2015 and 2019.

[8] The hours of congestion and delay refers to the total number of hours that the corridor experiences congestion. The IBR Program has defined congestion as speeds below 45 miles per hour per ODOT's definition of highway congestion. ODOT is coordinating this updated congestion definition with WSDOT.

[9] The two crossings are the I-5 Interstate Bridge and the I-205 Glenn Jackson Bridge.

- **Limited public transportation operation, connectivity, and reliability:** Due to limited public transportation options, a number of transportation markets are not well served. The key transit markets include trips between Portland Central City and the city of Vancouver and Clark County, trips between north/northeast Portland and the city of Vancouver and Clark County, and trips connecting the city of Vancouver and Clark County with the regional transit system in Oregon. Current congestion in the corridor adversely impacts public transportation service reliability and travel speed. Southbound bus travel times across the bridge are currently up to three times longer during parts of the AM peak compared to off-peak. Travel times for public transit using general purpose lanes on I-5 in the Program area are expected to increase substantially by 2030.

In 2019, more than 14,000 freight trips carrying over $132 million in commodities traveled across the I-5 Interstate Bridge each weekday. Freight volumes moved by truck to and from the area are projected to more than double by 2045.

Deficiencies such as narrow lanes and shoulders, as well as short merging, diverging, and weaving distances, reduce the efficiency and safety of freight truck movement.

In 2005, southbound bus travel times across the bridges were up to three times longer during parts of the AM peak (i.e., morning high traffic period) than during off-peak times. As of 2019, bus travel times are four times longer during the AM peak.

If the bridges are not replaced, travel times for public transit using general-purpose lanes on I-5 in the Program area are expected to increase by 50% by 2045 as a result of increased congestion.

- **Safety and vulnerability to incidents:** The Interstate Bridge and its approach sections experience crash rates more than two times higher than statewide averages for comparable facilities. Incident evaluations generally attribute these crashes to traffic congestion and weaving movements associated with closely spaced interchanges and short merge distances. Without breakdown lanes or shoulders, even minor traffic accidents or stalls cause severe delay or more serious accidents (Figure 1-2).

Figure 1-2. Crash Blocking the Interstate Bridge

- **Substandard bicycle and pedestrian facilities:** The bicycle/pedestrian lanes on the Interstate Bridge are about 3.5 to 4 feet wide, narrower than the 10-foot standard, and are located extremely close to traffic lanes, thus impacting safety for pedestrians and bicyclists (Figure 1-3). Direct pedestrian and bicycle connectivity are poor in the Program area.

Figure 1-3. Bicycle and Pedestrian Path on the Interstate Bridge

Compliance with the Americans with Disabilities Act (ADA) varies for the existing shared-use paths. The paths comply with the maximum gradient (4.7%), and there are no objects that overhang or protrude into the path. However, the paths do not comply with guidelines for curb ramps (both in number and design), width, passing spaces, cross slope, or railing height (FHWA 2001; U.S. Access Board 2013). The paths are also in close proximity to traffic lanes; this increases bicyclist and pedestrian exposure to vehicular traffic, noise, and emissions.

- **Seismic vulnerability:** The existing Interstate Bridge is located in a seismically active zone. It does not meet current seismic standards and is vulnerable to failure in an earthquake.

The existing bridges were designed before modern seismic design codes were established. The foundations are likely to displace during a strong earthquake, resulting in the collapse of the bridge spans into the river. In addition, the movable span lift towers would be overstressed due to the inertia of the concrete counterweights and would collapse onto the bridge, causing the adjacent spans to fail. This collapse potential is due to the fact that hundreds of timber bridge support piles sit within loose sand that can liquefy during an earthquake.

All new federally funded highway bridges are required to be designed to the current edition of the AASHTO Guide Specifications for LRFD Seismic Bridge Design (AASHTO 2022). In addition, State Departments of Transportation (DOTs) typically adopt local practices to address potential geologic hazards in the region (e.g., the Cascadia Subduction Zone). State DOTs may also prescribe elevated levels of seismic performance based on the importance of the structure as it relates to public safety, national defense, and economic investment, as is the case for the Interstate Bridge.

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funding; community and business interests; under-represented, low income, and minority communities; commuter and freight mobility; maritime mobility; and the environment.

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- Supporting a healthy community.
- Supporting a healthy and vibrant mix of residential, commercial, industrial, recreational, cultural, and historic areas land uses.
- Supporting aesthetic quality that achieves the level of a regional landmark.
- Recognizing the history of the community surrounding the Program area, supporting improved community cohesion, and avoiding neighborhood disruption.
- Preserving parks, historic and cultural resources, and green spaces.

1.5.2 Mobility, Reliability, Accessibility, Congestion Reduction, and Efficiency

- Providing congestion reduction and mobility, reliability, and accessibility for all users, and recognizing the requirements of local, intra-corridor, and interstate movement now and in the future.
- Providing an efficient transportation system through transportation system management, encouraging reduced reliance on single-occupancy vehicles, improving incident management, and providing increased capacity measures.

Reliability refers to consistency or dependability in travel times as measured from day to day and/or across different times of the day.

Mobility refers to the ability to easily move between different locations.

Modal refers to the various methods (or modes) of transportation such as motor vehicle, transit, walking, cycling, rolling, or other means.

1.5.3 Modal Choice

- Providing modal choice for users of the river crossing including highway, transit, high-capacity transit, bicycle, and pedestrian modes.

1.5.4 Safety

- Ensuring safety for vehicles (trucks, cars, emergency, and transit), pedestrians, bicyclists, river users, and air traffic at the crossing.

1.5.5 Regional Economy and Freight Mobility

- Supporting a sound regional economy and job growth.
- Enhancing the I-5 corridor as a global trade gateway by addressing the need to move freight efficiently and reliably through the Program area, and allowing for river navigational needs.

1.5.6 Stewardship of Natural and Human Resources

- Respecting, protecting, and improving natural resources including fish, wildlife habitat, and water quality.
- Supporting improved air quality.

- Minimizing impacts of noise, light, and glare.
- Supporting energy efficiency through design, construction, and use.

1.5.7 Distribution of Impacts and Benefits

- Ensuring the fair distribution of benefits and adverse effects of the Program for the region, communities, and neighborhoods adjacent to the Program area.

1.5.8 Cost-Effectiveness and Financial Resources

- Ensuring cost-effectiveness in design, construction, maintenance, and operation.
- Ensuring a reliable funding plan for the Program.

1.5.9 Bi-State Cooperation

- Fostering regional cooperation and planning.
- Supporting existing growth management plans in both states.
- Supporting balanced job growth.

1.6 Next Steps

The community will have an opportunity to review this Draft SEIS and provide feedback during the public review and comment period (dates will be added when known). The design of the proposed improvements, including the selection of specific design options, may be further refined based on findings and public input, which will be documented in the Final SEIS and an Amended ROD issued by FHWA and FTA. The design of the Modified LPA will be developed to a level of detail that will allow the IBR Program to apply for permits and update cost estimates. The IBR Program will continue to work and foster relationships with agencies, tribes, and the public through completion of the Program.

IBR Draft SEIS - RECORD #2645 DETAIL

First Name :	Anton
Last Name :	Holloman-Wilkins
Attachments :	DSEIS-2645_Holloman-Wilkins_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #2645 DETAIL

Submission Date : 11/18/2024
First Name : Anton
Last Name : Holloman-Wilkins
Business/Organization/Agency :

Submission Input :

First Name:
Anton

Last Name:
Holloman-Wilkins

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
There is only one chance to get this right. We won't be building another bridge like this in any of our lifetimes. Please prioritize transit on this bridge! Pedestrian and bike infrastructure should also be included. But nothing should be built without some form of train link over the bridge.

JCA comment #: 642

IBR Draft SEIS - RECORD #2646 DETAIL

First Name :	Carver
Last Name :	Oblander
Attachments :	DSEIS-2646_Oblander_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #2646 DETAIL

Submission Date : 11/18/2024
First Name : Carver
Last Name : Oblander
Business/Organization/Agency :

Submission Input :

First Name:
Carver

Last Name:
Oblander

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Climate Change

Comment:
I have deep misgivings about the climate impacts of this project. As the most expensive infrastructure project in Oregon's history, this bridge will be a testament to the future residents of our region on what our priorities were at this time. A bridge that overwhelmingly favors carbon-intensive modes of transportation will lock in higher carbon (and other pollutant) emissions for generations to come.
A larger bridge and additional lanes will not reduce pollution. Any increase in car capacity will simply become filled with induced demand. This is not the legacy we should leave behind, when the impact will be poorer air quality and more severe climate change, while the future drivers will left frustrated and simply demanding an even larger bridge. We should use this project as an opportunity to be a leader on climate change, and make this a true multi-modal and environmentally just bridge that we can all be proud of.

JCA comment #: 641

IBR Draft SEIS - RECORD #2647 DETAIL

First Name :	J.M.
Last Name :	Schultz
Attachments :	DSEIS-2647_sch_Original.pdf (1 mb) Interstate_Bridge_Replacement_Program.pdf (1 mb) Interstate_Bridge_Replacement_Program.pdf (1 mb)

IBR Draft SEIS - RECORD #2647 DETAIL

Submission Date :	11/18/2024
First Name :	jm
Last Name :	sch
Business/Organization/Agency :	
Attachments :	Interstate Bridge Replacement Program.pdf (1 mb)

Submission Input :

Hello

Your online comment form for the IBR project was not able to accommodate any embedded photographs so I have had to resort to email.

I have attached my comments in a .pdf file as they won't embed directly in this email.

If you have any trouble with the email attachments, please let me know and I will try to resend them.

thanks

J.M. Schultz

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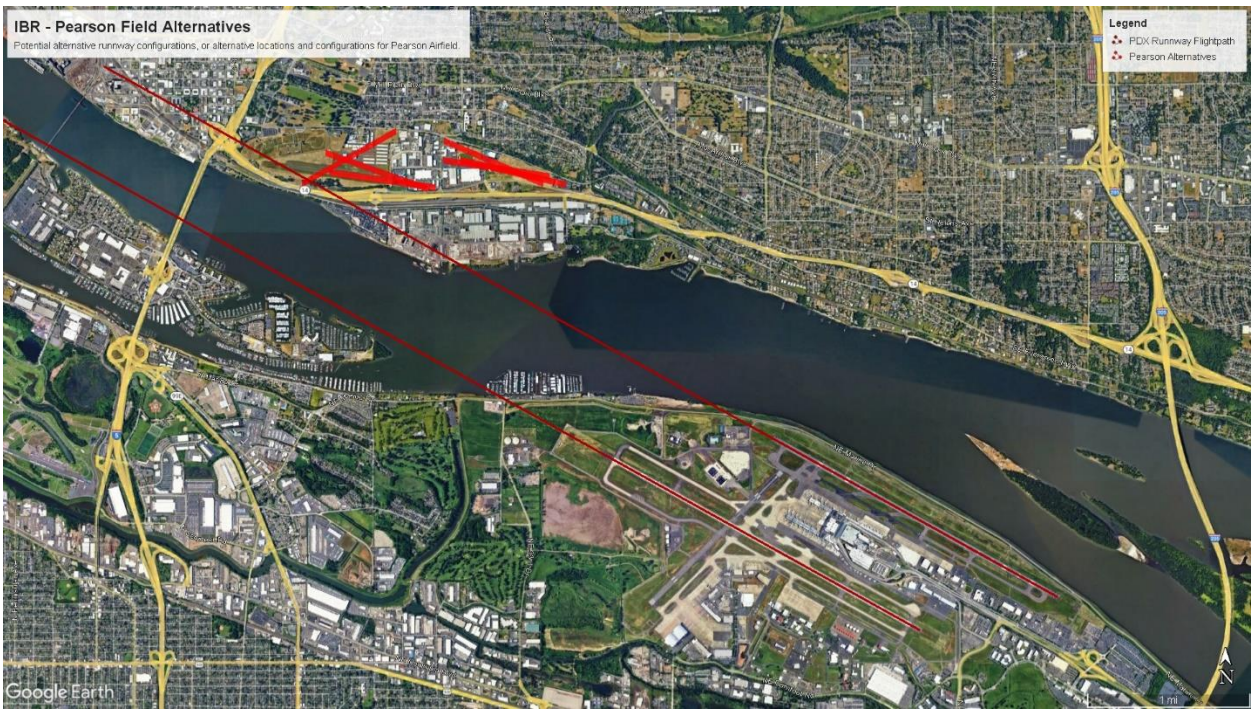

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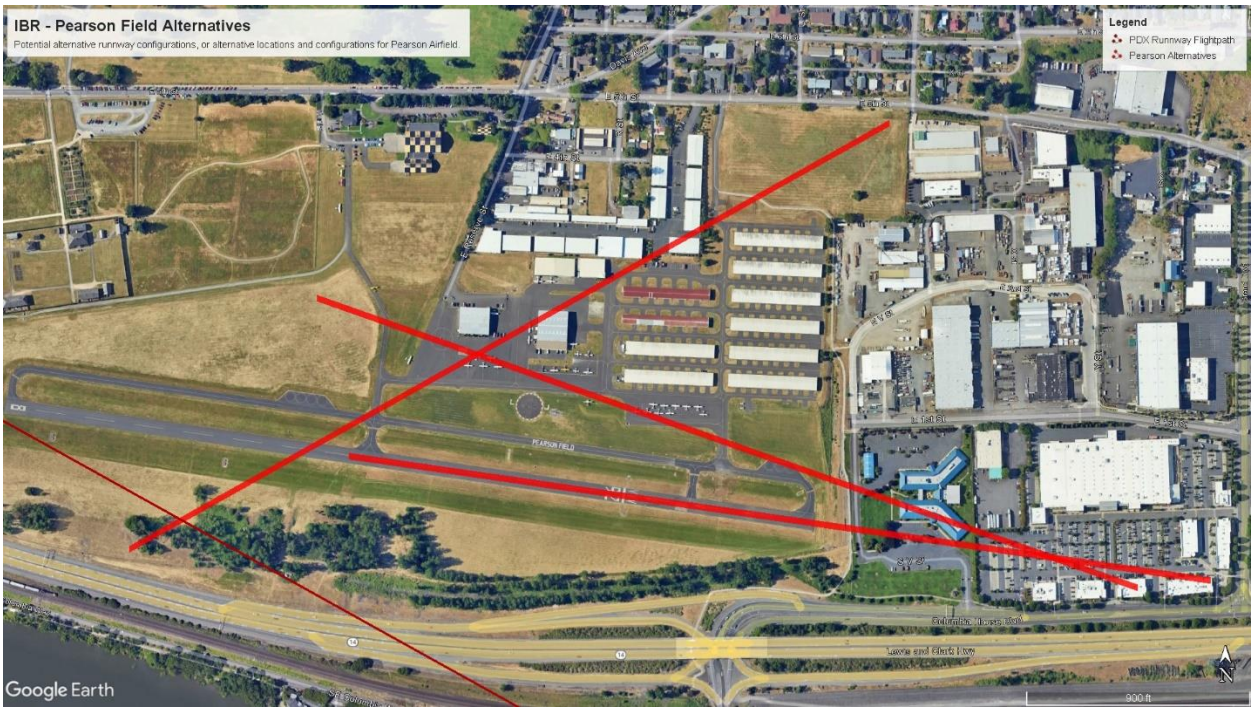

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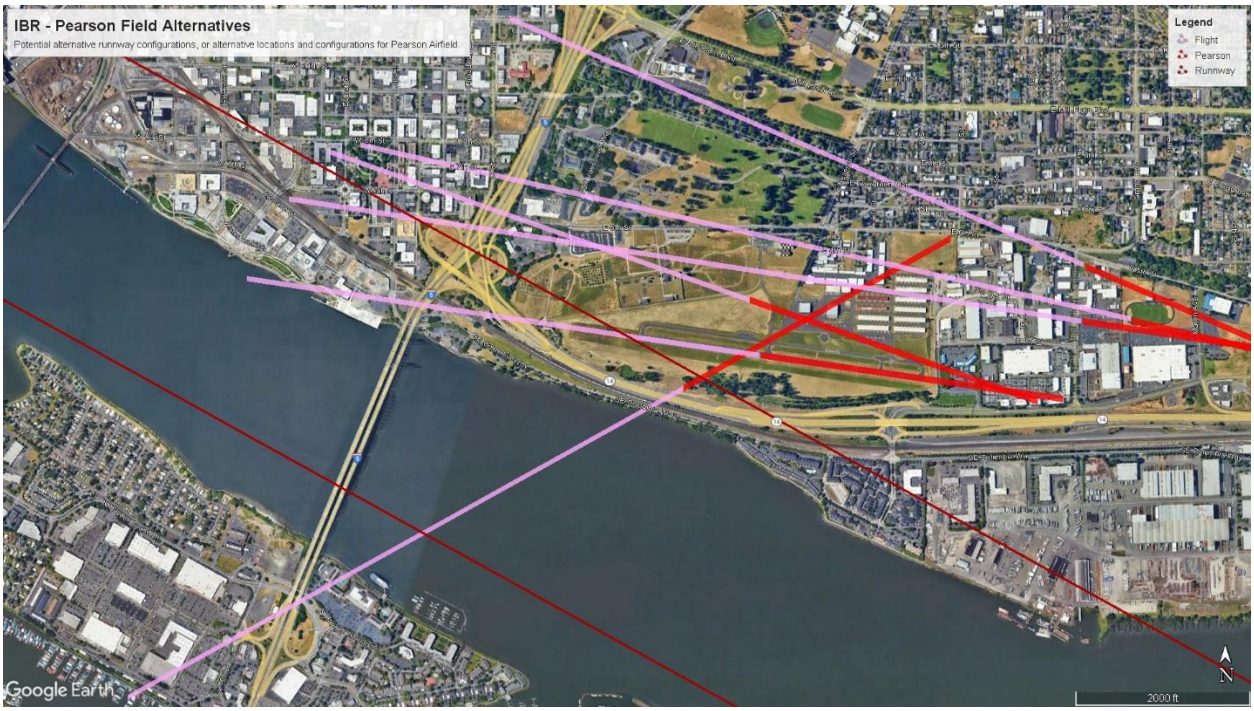

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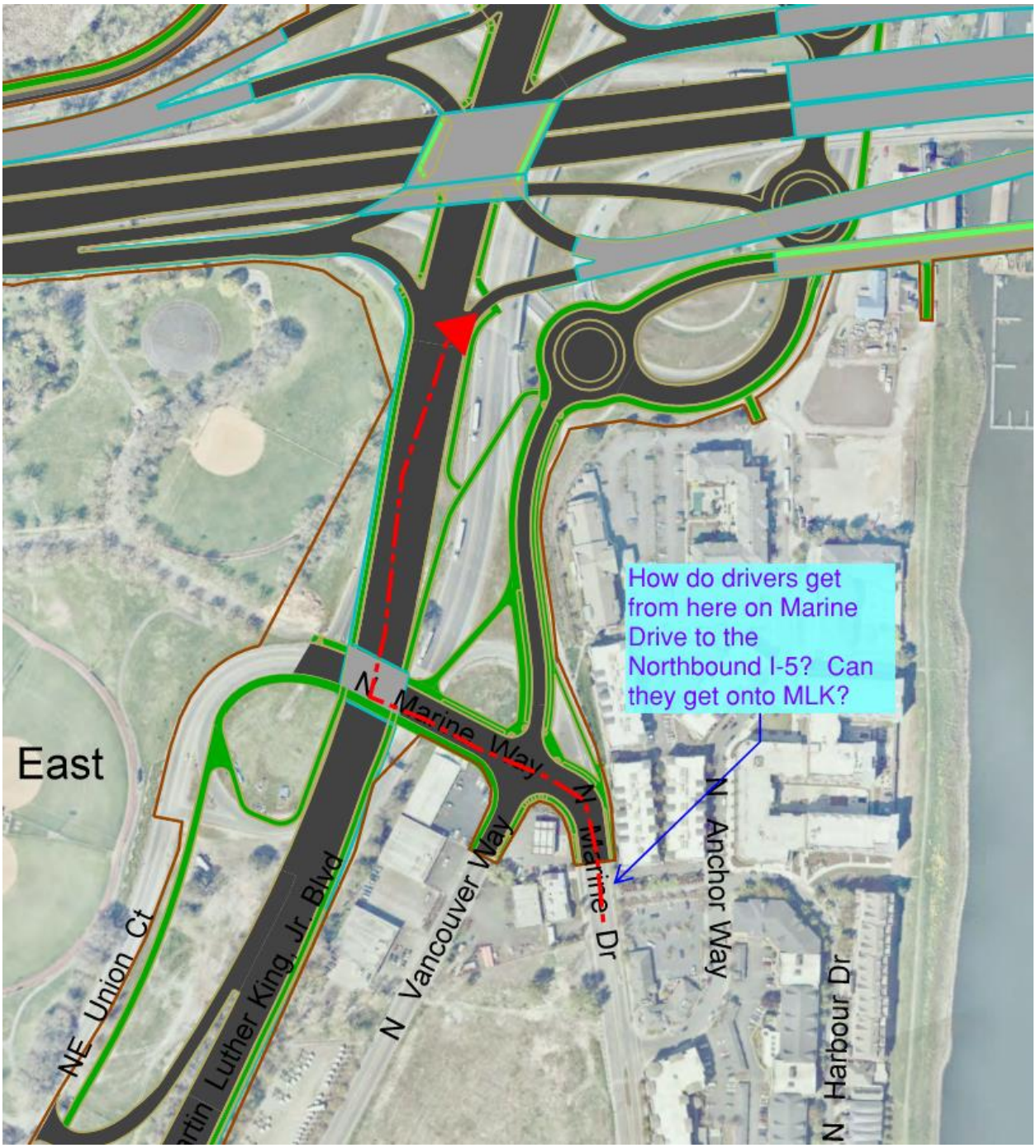

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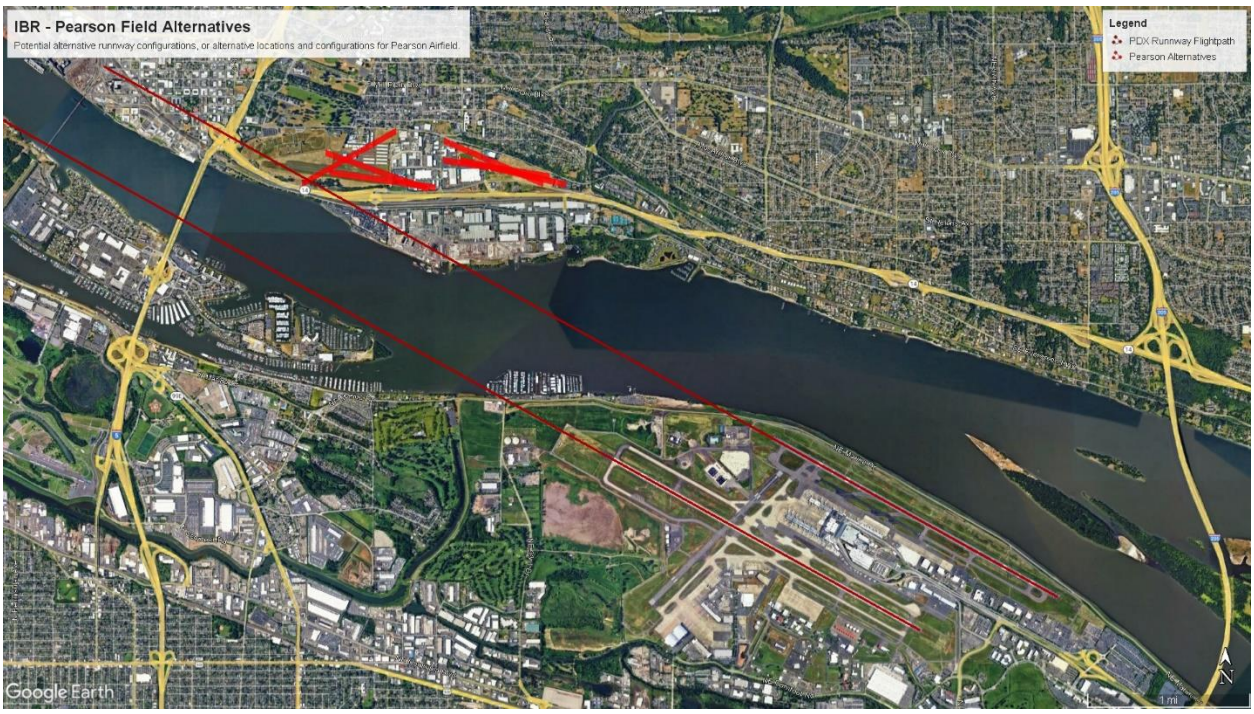

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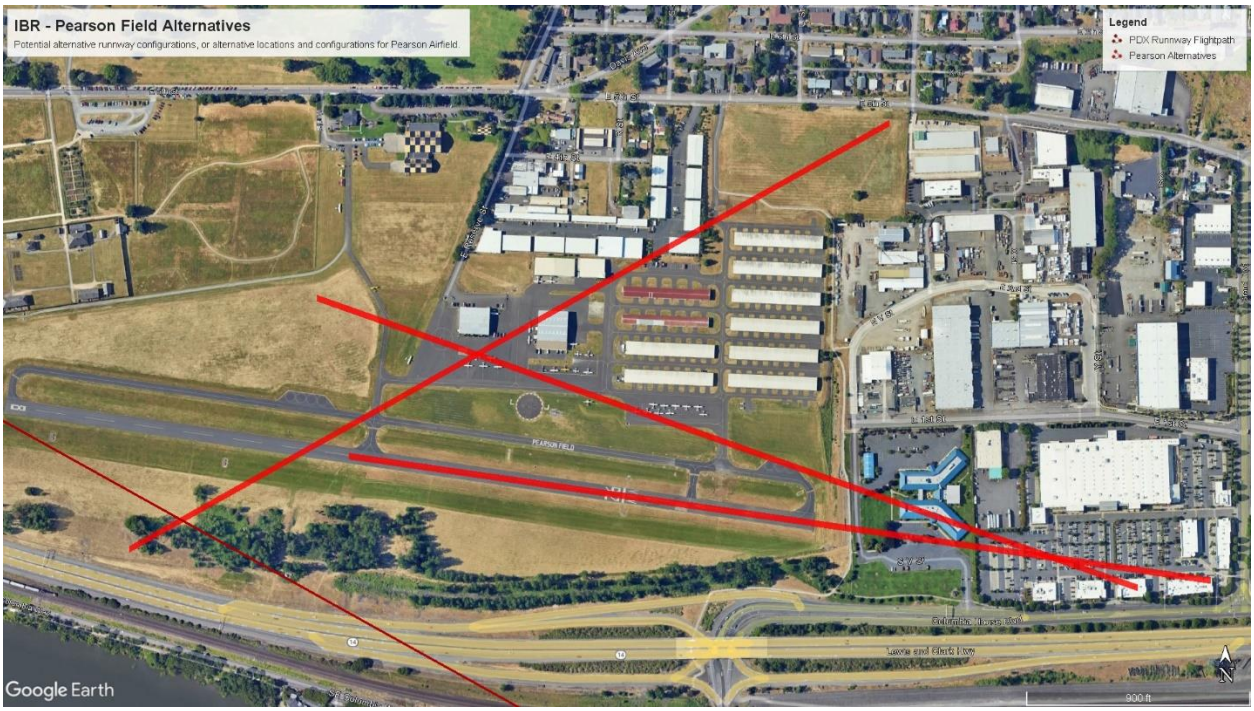

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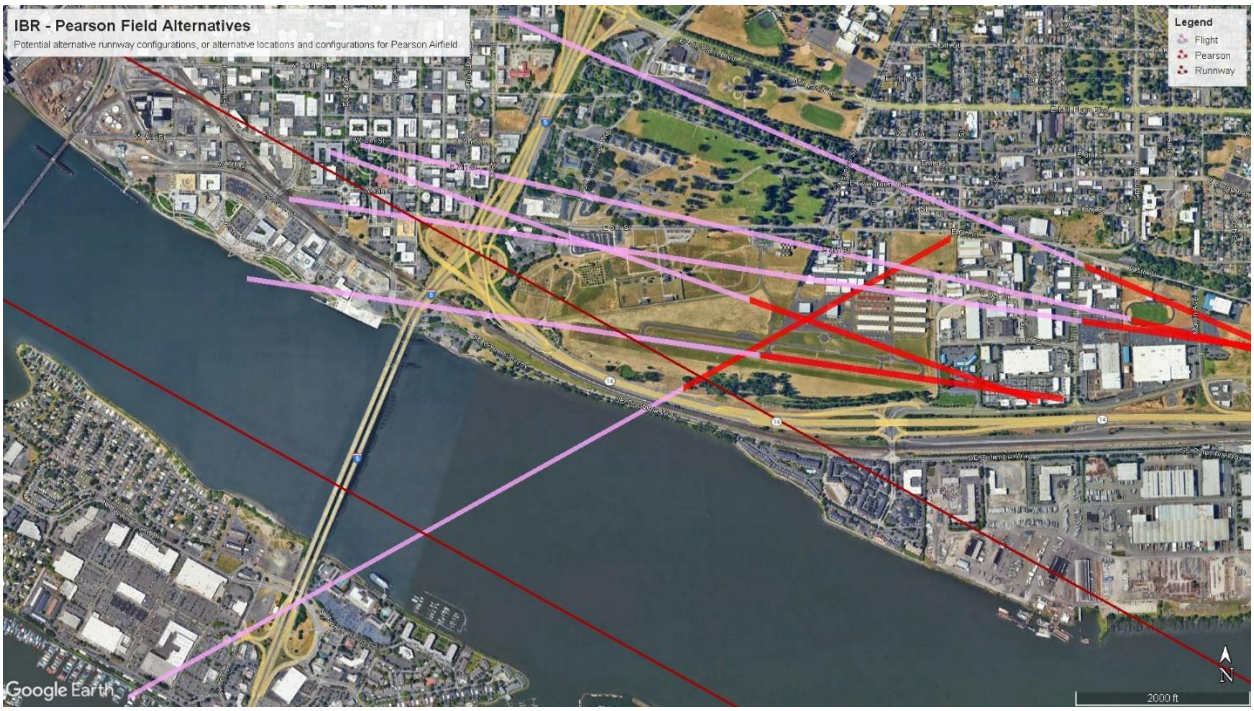

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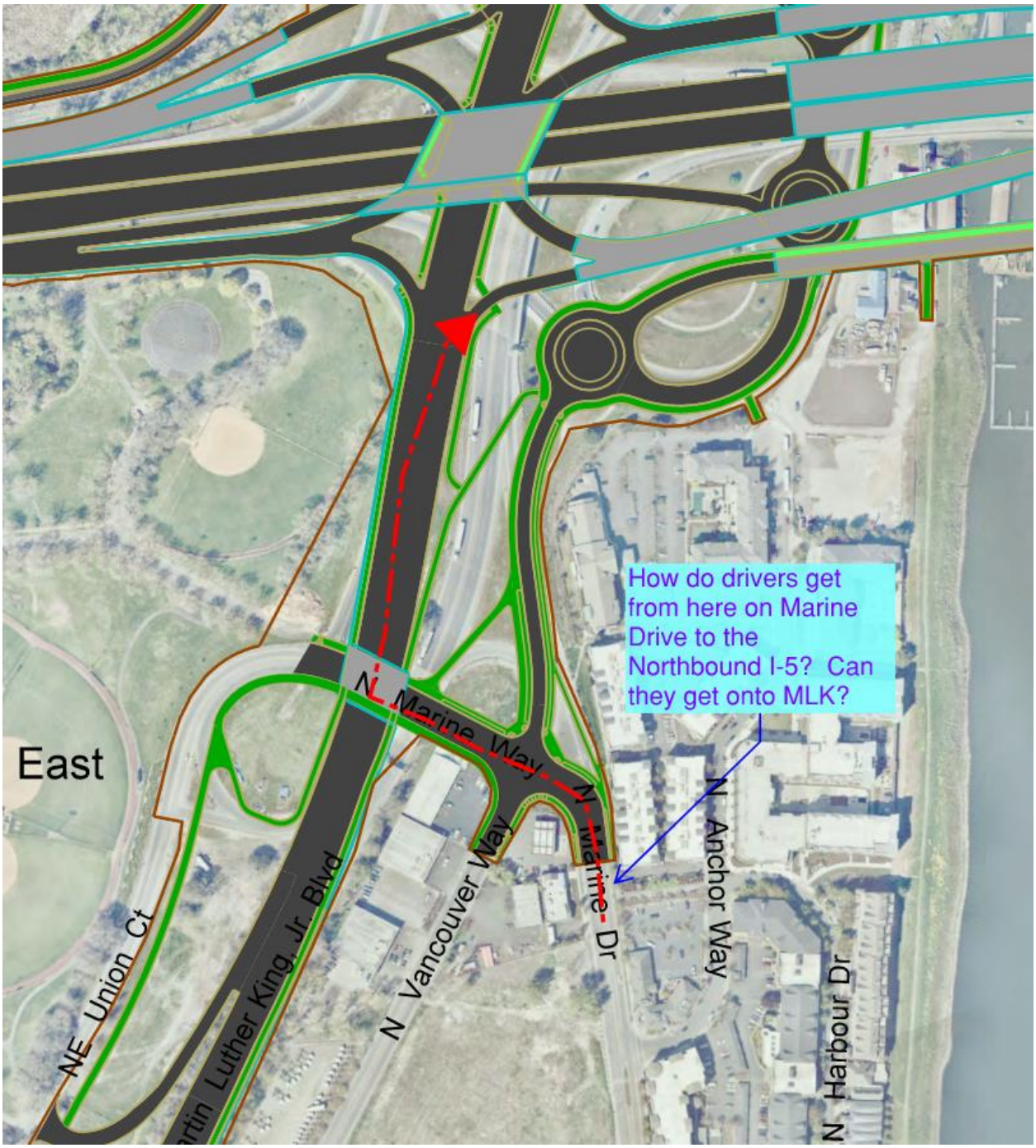

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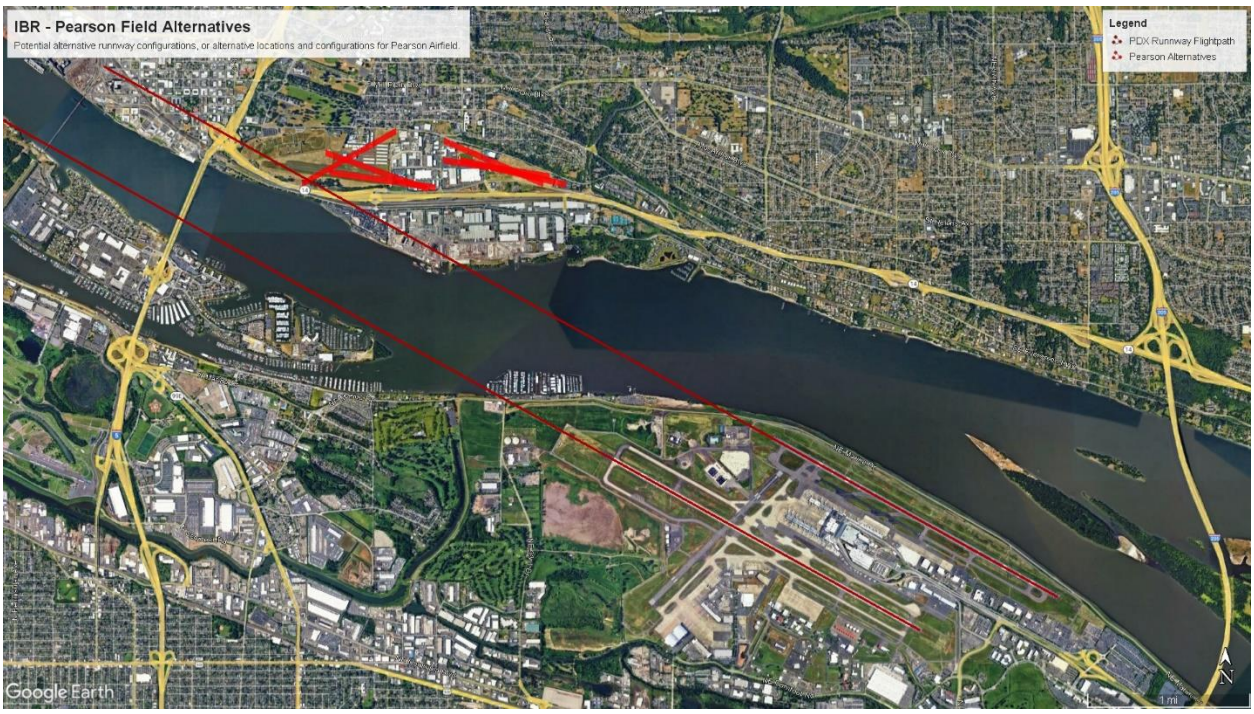

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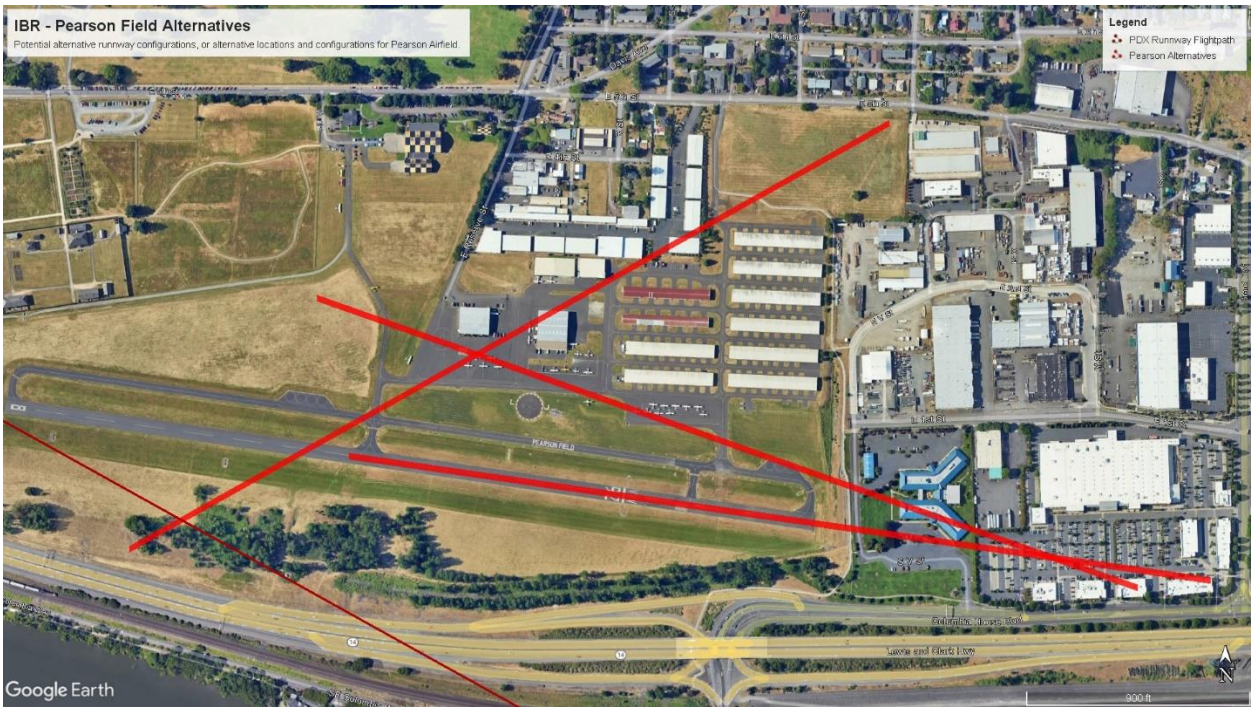

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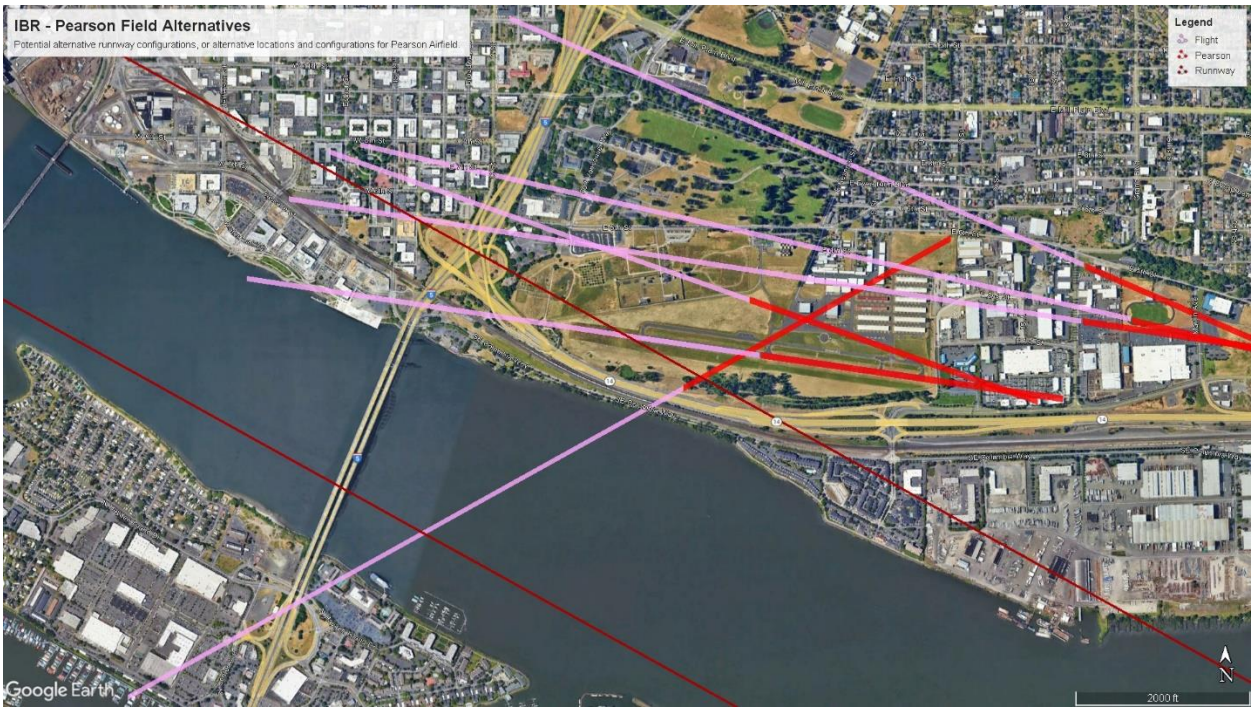

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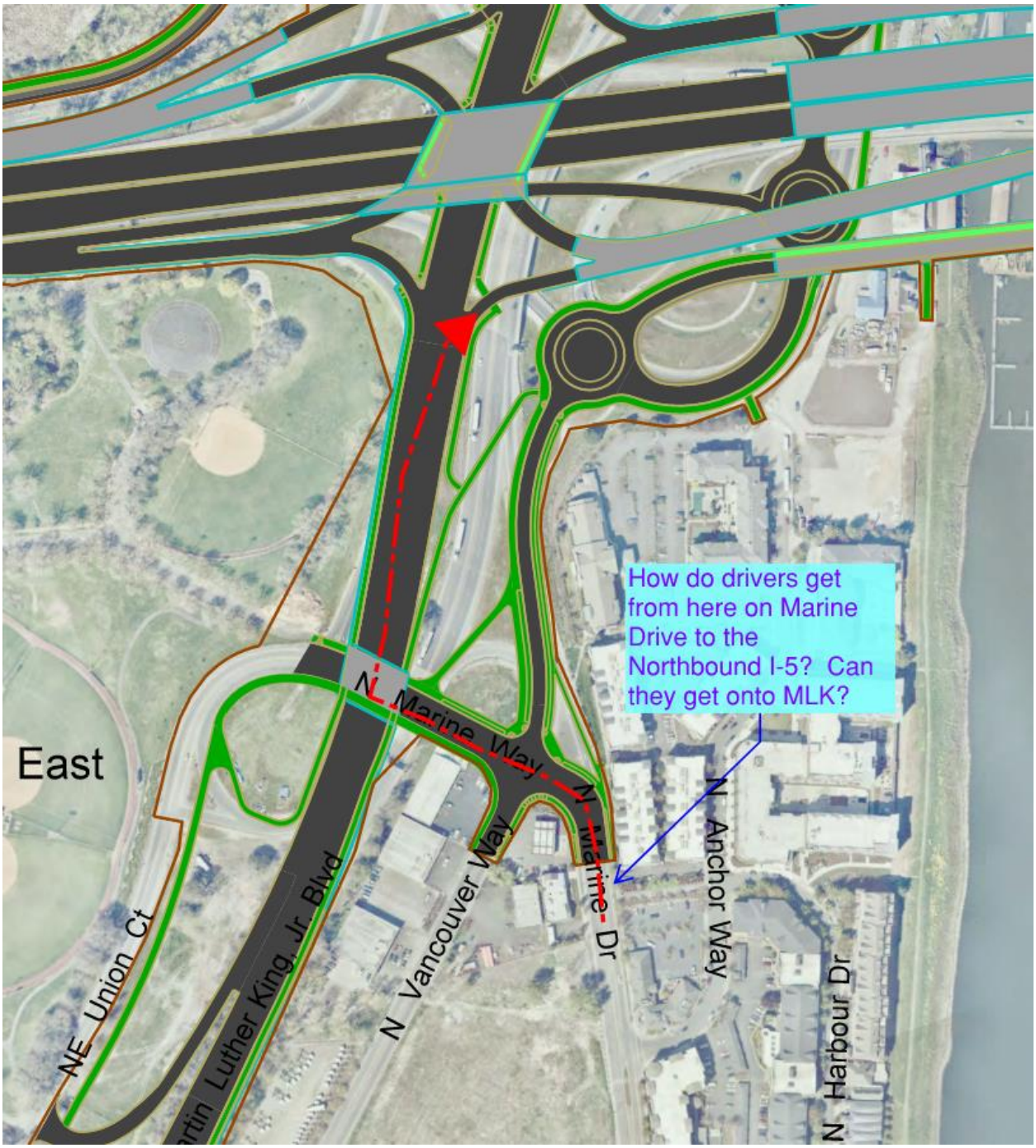

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IBR Draft SEIS - RECORD #2648 DETAIL

First Name :	Carver
Last Name :	Oblander
Attachments :	DSEIS-2648_Oblander_Original.pdf (6 kb)

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Submission Date : 11/18/2024
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Submission Input :

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[redacted]

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Topic Area:
Transportation

Comment:
I am writing to express support for prioritizing the future capacity of public transit on the new bridge. This new bridge will stand for many decades to come, so it is important for it to be built to support the future needs of our region, which will be different from today's. That means supporting higher capacity transit in the future.
This could include measures such as ensuring that train stations are built to potentially support four-car trains when downtown light rail is upgraded, ensuring there is space for multi-lane BRT or heavy rail, and ensuring capacity for a future Cascadia high speed rail line.

JCA comment #: 640

IBR Draft SEIS - RECORD #2649 DETAIL

First Name :	Sarah
Last Name :	Lombardi
Attachments :	DSEIS-2649_Lombardi_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #2649 DETAIL

Submission Date : 11/18/2024
First Name : Sarah
Last Name : Lombardi
Business/Organization/Agency :

Submission Input :

First Name:
Sarah

Last Name:
Lombardi

[redacted]

[redacted]

[redacted]

[redacted]

Topic Area:
Transportation

Comment:
I support the seismic replacement, light rail extension, and bike and pedestrian improvements on the Interstate Bridge Replacement Program. However, any other costs outside of the aforementioned ones, including widening the bridge, will do nothing but waste tax dollars and will certainly not relieve congestion. Additionally, I would hate to see the city I love so much turn into a sprawling mass of highway. Freeway expansion projects result in induced demand, not reduced congestion. As an occasional (and generally reluctant) driver, I support congestion pricing instead of freeway expansion, even though it will mean money out of my pocket. I bike or take transit far more often than I drive and vastly prefer those transportation methods over driving. But it is far too easy to drive in this city, and to drive faster than the speed limit, as I have seen increasingly over time. We need to put more time, energy, and money into enfranchising citizens to opt for cleaner and less dangerous

transportation options.

JCA comment #: 639

IBR Draft SEIS - RECORD #2650 DETAIL

First Name :	Josh
Last Name :	Hetrik
Attachments :	DSEIS-2650_Hetrik_Original.pdf (186 kb)

IBR Draft SEIS - RECORD #2650 DETAIL

Submission Date :	11/18/2024
First Name :	Josh
Last Name :	Hetrik
Business/Organization/Agency :	
Attachments :	DSEIS-2650_Portland_Original.pdf (6 kb)

Submission Input :

First Name:
Josh

Last Name:
Hetrik

[redacted]

[redacted]

[redacted]

Topic Area:
Climate Change

Comment:
This project is generational infrastructure. Accordingly, we must look forward to future generations to consider the impacts. Locking ourselves into billions of dollars of fossil fuel infrastructure is the wrong direction — we can't meet climate goals while expanding auto capacity. We can't afford to make decisions that ignore the urgent need for decarbonizing our transportation system. Instead of spending billions on highway expansions that aren't necessary to seismically upgrade the bridge, we need to be heavily investing in active transportation and public transit.

JCA comment #: 638

IBR Draft SEIS - RECORD #2651 DETAIL

First Name :	Josh
Last Name :	Hetrick
Attachments :	DSEIS-2651_Hetrick_Original.pdf (6 kb)

IBR Draft SEIS - RECORD #2651 DETAIL

Submission Date : 11/18/2024
First Name : Josh
Last Name : Hetrick
Business/Organization/Agency :

Submission Input :

First Name:
Josh

Last Name:
Hetrick

[redacted]

[redacted]

[redacted]

Topic Area:
Induced Demand

Comment:
The projections made by this project are inaccurate, as admitted by project staff and reported by multiple news outlets. They predict a present that doesn't exist, let alone a future that's even further off the mark. We're getting farther from the traffic counts being relied on to justify this project, not closer. Expanding highway capacity is unnecessary, and if we do so we can expect to induce demand for more driving. The only proven method for managing urban congestion is pricing it fairly, and using the revenue to improve non-driving modes.

JCA comment #: 637

IBR Draft SEIS - RECORD #2652 DETAIL

First Name :	Doug
Last Name :	Allen
Attachments :	DSEIS-2652_Allen_Original.pdf (3 mb) CSA_2023_03_29.pdf (3 mb) CSA_2023_03_29.pdf (3 mb)

IBR Draft SEIS - RECORD #2652 DETAIL

Submission Date :	11/18/2024
First Name :	Doug
Last Name :	Allen
Business/Organization/Agency :	Association of Oregon Rail and Transit Advocates
Attachments :	CSA_2023_03_29.pdf (3 mb)

Submission Input :

>From Douglas R. Allen, Portland Area Vice President, AORTA-Association of Oregon Rail and Transit Advocates

November 17, 2024

AORTA-Association of Oregon Rail and Transit Advocates is a statewide organization advocating for wiser transportation alternatives. As our Portland Area Vice President, I submit the following comments regarding the Draft Supplemental Environmental Impact Statement (DSEIS):

Setting the Context for an alternative that should have been considered

The Interstate Bridge Replacement Program (IBRP) has relied on results from the Columbia River Crossing (CRC) scoping process which we now know was both defective and inadequate. IBRP staff, state agency staff, federal agency staff (FHWA and FTA), consultants, advisory committees, and legislative committees failed to take a hard look at whether the CRC scoping process was still an adequate source of project alternatives, or whether there were other alternatives that met the purpose and need of the project and deserved further study.

The CRC scoping process relied on assumptions that were wrong or were subsequently invalidated. Reasonable paths toward project design were discarded too early. The chosen design had numerous flaws that needed remediation, ranging from an unworkable bridge configuration to excessive cost to impairment of navigation to needless impact on Hayden Island and downtown Vancouver.

Our comments reference an alternative that we presented in response to the floundering CRC process. AORTA, through the efforts of our then Strategic Planner Jim Howell and architect George Crandall, synthesized what we called the “Common Sense Alternative Version Two” (CSA-II). This was a modification of a prior proposal, the “Common Sense Alternative” (CSA) that had considerable public support. That older proposal was based on retaining the existing highway bridges, adding a supplemental bridge, and altering the downstream BNSF Railway bridge by adding a mid-river lift span which would have allowed all commodity barge traffic to use the higher fixed spans of the existing highway bridges. The CSA proposal would have been much less expensive and much less intrusive but was roundly criticized by CRC staff.

See attached pdf file images of CSA-II concept. File name: CSA_2023_03_29.pdf. This file is further referenced in Appendix C of these comments.

The subsequent CSA-II proposal dealt with CRC staff criticisms of the CSA proposal, and met all requirements of the CRC Purpose and Need, which has remained the Purpose and Need for the IBRP. The CSA-II was never studied by the CRC project, because the CRC scoping process, through faulty analysis, had eliminated consideration of all project alternatives having an opening span.

The CRC and the associated agencies were not ignorant of the difficulty in designing a fixed-span (non-opening) bridge to replace the current bridges. This was well-described by David Cox, Administrator, Oregon Division, Federal Highway Administration in a seminar presentation at Portland State University's Center for Transportation Studies on November 5, 2004. For reference see <https://www.youtube.com/watch?v=HBOcNhNGbg4> https://www.youtube.com/watch?v=HBOcNhNGbg4

Cox (at time 57:06 in video) said "…and then there's a railroad bridge downstream not too far that could be affected. We're worried in fact about the channel, and… the channel is close to downtown Vancouver, so if we were to span that channel with a bridge that wouldn't need to be opened, we'd be way up in the air. It'd be hard to get down and still hit Vancouver, and then there's a little airport there on the Washington side also, so if you've got a bridge way in the air, that could interfere with the airport. So one thought is well maybe we should move the channel to the south side of the river. That way we could get up over it and back down before we get to Vancouver, but if we do that then it won't align with the railroad bridge channel, and ships will have to do that [swerves his left hand], which they're not good at, so then we would have to rebuild a railroad bridge. If you're going to rebuild the railroad bridge, you may as well make it bigger and wider, so you can see how this conversation sort of scares people when they start talking about it."

How the CRC scoping process was defective:

The initial CRC "Components Step A Screening" is described in the "DRAFT COMPONENTS STEP A SCREENING REPORT" of March 22, 2006. For reference, see:

<https://wsdot.wa.gov/accountability/ssb5806/docs/5_Project_Management/TaskForce/2006/TaskForce_032206_DraftStepAScreeingReport.pdf>
https://wsdot.wa.gov/accountability/ssb5806/docs/5_Project_Management/TaskForce/2006/TaskForce_032206_DraftStepAScreeingReport.pdf

Report page 1-1 (page 12 of pdf file) identifies and describes the initial CRC "Components Step A Screening" in the second paragraph:

"This Components Step A Screening Report describes how a broad range of potential transportation improvements (also known as "components") was initially evaluated and screened, and presents the results of that screening. Those components that passed this initial screening will undergo a second round (Step B) of evaluation and screening."

In Step A, river crossing components were screened against six pass/fail questions that addressed whether a component met the project purpose and need.

Table 5-1 shows the results of the Step A screening, in which the following four river crossing alternatives with movable spans all passed:

RC-1 Replacement Bridge Downstream/Low-level/Movable

RC-2 Replacement Bridge Upstream/Low-level/Movable

RC-7 Supplemental Bridge Downstream/Low-level/Movable

RC-8 Supplemental Bridge Upstream/Low-level/Movable

This screening report, on page 5-7 (page 68 of pdf) states: “One potential improvement would be to straighten the path through the bridges by relocating the opening in the BNSF railroad span to the center of the Columbia River.” This echoes FHWA Regional Administrator David Cox’s earlier observation. The CSA-II alternative does include modifying the BNSF bridge. The screening report contains staff recommendations to advance all of these:

“Staff Recommendation: Advance RC-1 through RC-4” on report page 3-2

“Staff Recommendation: Advance RC-7 through RC-9” on report page 3-4

Despite meeting the purpose and need, all movable span alternatives were axed in a subsequent phase, for reference documented here:

<https://www.wsdot.wa.gov/accountability/ssb5806/docs/6_Project_Development/Alternative_Development/AdditionalComponentScreening.pdf>
https://www.wsdot.wa.gov/accountability/ssb5806/docs/6_Project_Development/Alternative_Development/AdditionalComponentScreening.pdf

This “Additional Components Screening” document consists of a cover memo to the CRC Task Force, dated June 7, 2006, from Doug Ficco and John Osborn recommending removal of the RC-1, RC-2, RC-7, and RC-8 Movable Span Options, plus other options, and attached memos dealing with particular groups of concepts. The relevant attached memo for our comments is dated June 7, 2006, and is FROM: CRC Engineering Team, TO: Doug Ficco, John Osborn, SUBJECT: Screening of RC-1, RC-2, RC-7, and RC-8 Moveable Span Components.

The “CRC Engineering Team” viewpoint is summarized on page 1 of their memo:

“Moveable spans are more costly in both initial cost and maintenance and operations when compared to a fixed span.

In addition, there do not appear to be any significant advantages to constructing a movable span bridge. A movable span would permit a lower profile for the bridge, and thus could potentially result in different

(potentially fewer) landside impacts. However, engineering studies to date indicate that the areas of potential impact would be virtually the same for the low-level, movable span options as compared to the fixed-span (non-movable) mid-level bridge options."

However, when we consider this view in detail, it becomes clear that it is not the whole story. On page 2 of the Engineering Team memo, they state:

"A movable span is typically only considered when the vertical clearance requirements cannot practically be met, if there are height restrictions that prohibit a higher fixed span, or if a lower profile bridge results in fewer undesirable impacts to onshore or in-water resources. Our analyses to date indicate that none of those three circumstances apply to this crossing."

The June 7 memo to Ficco & Osborn explores this issue further on page 3:

"One of the potential concerns when comparing river crossing options is that the higher elevation options could potentially have more significant impacts at the onshore bridge approaches in Vancouver and on Hayden Island when compared to lower elevation, moveable span options. However, the design development of the low- and mid-level options has resulted in a relatively minor difference of elevation of about 15 feet at mid-span (as noted above, the low-level bridge would be at about 80 ft above the water, and the mid-level span would be at about a 95 ft. elevation). The difference in elevation would generally be progressively less as you move away from the river, resulting in relatively minor differences in elevation at the Vancouver and Hayden Island approaches. As a result, the potential on-shore impacts can be viewed as approximately equivalent for the low and mid-level options."

The above paragraph is nonsensical, because it ignores the existence of the BNSF Railway east-west embankment along the north shore of the Columbia. With a movable span, the freeway could go under the railroad. That is an essential component of the CSA-II proposal.

With a higher fixed span, the freeway must go over the embankment at a considerable elevation to provide both the needed 23 or more feet of clearance over the rails and to accommodate the depth below pavement of the structure that carries the freeway and transit-way. This greatly increases the cost and extent of roadway and interchange reconstruction needed. The claim that a 15 foot difference (between alternatives) at mid-span would decline to a "relatively minor" difference at the Vancouver approach defies logic, as the actual difference would be closer to 50 feet as the freeway meets the BNSF Railway embankment.

Moreover, the June 7 memo to Ficco & Osborn does is not in accord with the CRC's "DRAFT COMPONENTS STEP B SCREENING REPORT" dated June 9, 2006 (two days after the memo recommending all movable span options be removed). For reference, see:

<https://data.wsdot.wa.gov/accountability/ssb5806/Repository/6_Project%20Development/Alt%20Narrowing%20Process/StepBScreeningReport.pdf>
https://data.wsdot.wa.gov/accountability/ssb5806/Repository/6_Project%20Development/Alt%20Narrowing%20Process/StepBScreeningReport.pdf

The “Step B Screening Report” directly contradicts the “Additional Components Screening” document issued two days earlier. The Step B Report recommends keeping the movable span options for further analysis.

“While each of the seven transit and nine river crossing components that advanced through Step A screening has its respective strengths and weaknesses, the Step B screening found that there are relatively few dramatic differences between the remaining components, and that these differences are not large enough to warrant completely eliminating any additional river crossing or transit components from further consideration.”

Notably, the Step B Screening Report assumes that the low-level river crossing components will go under the BNSF Railway embankment. The only way that the June 7 memo to Ficco & Osborn makes objective sense is if all river crossing components are assumed to fly over the BNSF embankment and tracks. This assumption is totally lacking in justification, and we are sure that IBRP has no basis for continuing to accept this irrational assumption without further analysis that would explore possible techniques and costs for going under the embankment.

The June 7 memo to Ficco & Osborn also contravened the assurance in the January 18, 2006 “Final Draft: Screening and Evaluation Framework” presented to the CRC Task Force.

It stated at the bottom of page 5: “Components that fail the relevant questions will be screened out, and the only way components will be prevented from proceeding to Step B component screening is if they receive a ‘fail’ rating.”

It is not clear whether the “Additional Components Screening” document purports to intercept and derail the movable span alternatives prior to Step B Screening, or retroactively, following Step B Screening.

In any case, the assumptions about the elevation profiles of the various alternatives need to be re-examined, because the US Coast Guard refused to issue a bridge permit for less than 116 feet of river clearance, requiring a project modification to a higher bridge, meaning that a design deemed impractical during the scoping process was re-introduced as the final design for a modified ROD. Substitution of a 116 ft. option required a NEPA “reevaluation” that invalidated the 2011 Record of Decision. The 116 ft. version had, and has, significantly greater on-shore impacts compared with an opening span bridge, as will be explained below.

In 2014, ODOT and WSDOT suspended the CRC Project due to lack of funding, leaving much criticism of the CRC unaddressed.

Problematic Decisions at Start-up of IBRP

Multiple years later, on November 18, 2019, Kate Brown, Governor of Oregon, and Jay Inslee, Governor of Washington signed a Memorandum of Intent to reopen a joint project office to resume the CRC:

“The work of this project office should include, but is not limited to, the reevaluation of the purpose and need identified for the project previously known as the Columbia River Crossing, the reevaluation of permits and development of a finance plan, the reengagement of key stakeholders and the public, and the reevaluation of

scope, schedule and budget for a reinvigorated bi-state effort for replacement of the Interstate 5 Columbia River bridge." (emphasis added)

After the CRC was revived as the Interstate Bridge Replacement Project (IBRP), there was considerable concern that equity and greenhouse gas emissions were not included in the Purpose and Need. IBRP sought guidance from FHWA and FTA, and were informed in a May 18, 2021 letter that substantial changes to the Purpose and Need could possibly trigger the need for a new EIS and NEPA process. Page 2 of letter:

"Furthermore, changes to the Purpose and Need section are particularly sensitive since it is so critical to determining the range of alternatives that must be considered. If such changes are so substantial that they render the existing range of alternatives inadequate, then a revised FEIS is no longer appropriate and a new EIS and NEPA process must be initiated to develop a new range of alternatives for the proposed action."

For reference:

<https://www.interstatebridge.org/media/kvbfptyv/ibr-cover-letter-and-federal-agency-response-pn_5-19-21_remediated-2.pdf> https://www.interstatebridge.org/media/kvbfptyv/ibr-cover-letter-and-federal-agency-response-pn_5-19-21_remediated-2.pdf

To move the project forward rapidly, as directed by the oversight committee consisting of representatives from the two state legislatures, the IBRP response was to proceed with only the Selected Alternative advanced in the CRC process FEIS, along with what were called "design options" rather than "alternatives." IBRP staff indicated publicly that only a predetermined and limited range of alternatives were going to be considered.

For example, at the May 18, 2021 Hayden Island listening session, Assistant Program Administrator Ray Mabey stated categorically that the Common Sense Alternative would not be considered. At the Executive Steering Group meeting on May 20, the presentation declared that "[a]ny effort to identify new alternatives would likely lead to similar conclusions [about the need to prepare a new EIS] since the previously identified transportation problems continue to exist today." For reference, see 5/20/2021 Presentation, page 36 at:

<https://www.interstatebridge.org/media/sz0jl4b2/ibr-esg-presentation-5-20-21_remediated.pdf> https://www.interstatebridge.org/media/sz0jl4b2/ibr-esg-presentation-5-20-21_remediated.pdf

At the Active Transportation Listening Session on June 8, the facilitator commented that the existing bridges will be replaced, which pre-excluded the CSA-II.

This approach violated the National Environmental Policy Act (NEPA), as interpreted by the courts:

"In summary, the comprehensive 'hard look' mandated by Congress and required by the statute must be timely, and it must be taken objectively and in good faith, not as an exercise in form over substance, and not as a

subterfuge designed to rationalize a decision already made." See Metcalf v. Daley, 214 F.3d 1135, 1142 (9th Cir. 2000).

NEPA does not allow an agency to reach a "prejudged political conclusion" that would make the environmental documents "nothing more than pro forma compliance with the requirements of NEPA." See Int'l Snowmobile Mfrs. Ass'n v. Norton, 340 F.Supp.2d 1249, 1261 (D. Wyo. 2004).

To be compliant with NEPA, consideration of all reasonable alternatives is required.

Instead, for reasons of expediency, and based on an incorrect interpretation of NEPA, IBRP chose not to reconsider or supplement the CRC scoping process with any alternatives beyond the previously selected alternative.

IBRP had concluded that any "new" alternative would require a completely new EIS and NEPA process, rather than being included in the SEIS. This was an unfounded logical leap. In fact, NEPA law is to the contrary: an SEIS must consider reasonable alternatives, especially where the original SEIS did not. In 2008, for example, the Ninth Circuit Court of Appeals struck down an SEIS for Yosemite National Park for inadequate capacity alternatives where the agency "realized the 'need for a reasonable range of user capacity alternatives because the original EIS did not look at alternatives for implementing carrying capacity.'" See Friends of Yosemite Valley v. Kempthorne, 520 F.3d 1024, 1039 (9th Cir. 2008) (emphasis deleted).

An EIS's selection and discussion of alternatives must foster "informed decision-making and informed public participation." See Oregon Nat. Desert Ass'n v. Bureau of Land Mgmt., 625 F.3d 1092, 1122 (9th Cir. 2010) (citation omitted).

Thus, the "existence of a viable but unexamined alternative renders an environmental impact statement inadequate." Again, see Oregon Nat. Desert Ass'n v. Bureau of Land Mgmt., 625 F.3d 1092, 1122 (9th Cir. 2010) (citation omitted).

An agency "must consider all reasonable alternatives within the purpose and need it has defined." See 'Ilio'ulaokalani Coal. v. Rumsfeld, 464 F.3d 1083, 1097 (9th Cir. 2006).

An EIS "shall provide full and fair discussion of significant environmental impacts and shall inform decision makers and the public of reasonable alternatives that would avoid or minimize adverse impacts or enhance the quality of the human environment."

See Ctr. on Envt. Qual., Update to the Regulations Implementing the Procedural Provisions of the National Environmental Policy Act, 85 Fed. Reg. 43,304, 43,363 (July 20, 2021).

The IBRP asserts that in accordance with 23 CFR 771.130(d), additional scoping is not required. While the

November 18, 2019 Governors' Memorandum of Intent implies that the project scope should be reevaluated, we are not asking for an opening of full scoping, but merely the consideration of reasonable alternatives that have been brought to the attention of the IBRP.

The CSA-II proposal was presented to Vancouver Mayor Anne McEnerny-Ogle along with Port of Vancouver Commissioner Don Orange on the morning of Friday, November 2, 2018 by Doug Allen, Jim Howell, Ron Buel, and George Crandall. Mayor McEnerny-Ogle subsequently served on the Executive Steering Group for the IBRP.

ODOT Director Kris Strickler and then Oregon Transportation Commission Chair Robert Van Brocklin together received an in-person presentations of the CSA-II from its authors George Crandall and Jim Howell in February, 2020, facilitated by one of Van Brocklin's former colleagues, lawyer John Bradach.

The IBRP was clearly aware of the CSA-II proposal. They wrongly attempted to discredit it, perhaps having regarded it as a threat to their plans for a rapid NEPA process.

HOW CSA-II is reasonable, i.e. MEETS PURPOSE AND NEED, avoids or reduces adverse impacts compared with the selected alternative, and was not examined, and the SEIS does not inform decision makers and the public of this reasonable alternative.

The CSA-II is a modest and reasonable concept:

See attached pdf file with images of CSA-II concept for reference, plus Appendix C, below.

The CSA-II is a reasonable alternative that should be considered in the SEIS. It meets all the elements of the purpose and need at lower cost and less environmental impact. The CSA-II is a workable crossing of the Columbia between Portland and Vancouver. It would eliminate the need for a full interchange on Hayden Island, allow continued navigation of the Columbia River by upstream businesses, and not interfere with aviation from Pearson Field.

Key elements of the CSA-II are:

* Install a lift span in the railroad bridge downriver from the existing Interstate Bridges. This would allow all commodity barge traffic to navigate under the high spans of the existing Interstate Bridges and reduce the number of lifts for river traffic by more than 90 percent.
* Construct a new eight-lane freeway bridge with a bascule opening that aligns with the lift span of the existing bridges. (This opening span is not unprecedented on a major Interstate Highway, such as the I-95 Bridge (Woodrow Wilson Bridge) over the Potomac River, recently built near Washington, D.C.) This bridge would accommodate river traffic of any height and align exceptionally well with existing Interstate-5 approaches. I-5 can continue to cross beneath the BNSF Railway overpass on the north side of the Columbia River. The CSA-II

low profile solves many of the engineering challenges of the final CRC proposal with less impact and less cost.
* Repurpose the existing Interstate Bridges for local traffic, public transit, bikes and pedestrians. Seismic retrofitting would be an option.
* Build a new bridge over the South Channel for local traffic, light rail, bikes and pedestrians that allows non-freeway vehicle access between North Portland and Hayden Island.
* Provide minor modifications, rather than reconstructing the Marine Drive interchange.

CSA-II meets IBRP Purpose and Need:

The CRC was intended to achieve “the following objectives:”

a) improve travel safety and traffic operations on the I-5 crossing’s bridges and associated interchanges;
b) improve connectivity, reliability, travel times, and operations of public transportation modal alternatives in the BIA;
c) improve highway freight mobility and address interstate travel and commerce needs in the BIA; and
d) improve the I-5 river crossing’s structural integrity (seismic stability).

See CRC 2011 FEIS at p. 1-5 (Sept. 23, 2011).

The CRC needs were identified in the FEIS as

1. Growing travel demand and congestion
2. Impaired freight movement
3. Limited public transportation operation, connectivity, and reliability
4. Safety and vulnerability to incidents
5. Substandard bicycle and pedestrian facilities
6. Seismic vulnerability.

See CRC FEIS at pp. 1-5 to 1-8.

These are the same as the needs identified by the IBRP. The IBRP April 2021 newsletter stated that the same six purpose and need elements are present as in the CRC: “Across all engagement activities, feedback from the community validated there is widespread agreement that the six previously identified transportation problems still exist: congestion and travel reliability, safety, earthquake vulnerability, impaired freight movement, inadequate bicycle and pedestrian pathways, and limited public transportation.” See second paragraph of the newsletter, available at <https://mailchi.mp/fd70e63f6e4c/april-newsletter-interstate-bridge-replacement-program> https://mailchi.mp/fd70e63f6e4c/april-newsletter-interstate-bridge-replacement-program

The CSA-II meets all six of these purpose statements, and—more importantly—it better serves the goals of equity and climate-change mitigation, than would the “Locally Preferred Alternative” of the CRC. When compared with the "no-build” alternative, this compliance with the purpose and need is obvious.

However, the IBRP has chosen an implausible interpretation of the need to improve seismic vulnerability and has reworded the Purpose and Need to support this interpretation. In a memo that we will discuss in greater detail below, IBRP staff present the following argument:

“As noted previously, under the CSA II any seismic upgrades to the existing bridge would be considered optional. However, any alternative that does not address the seismic deficiencies of the existing Interstate Bridge would not meet the program’s Purpose and Need statement. Subsequent evaluations of seismic retrofitting have determined that seismic retrofits would be prohibitively expensive and would incur additional impacts to the environment (due to the need for expansion in the Columbia River). In addition, seismic retrofits may not be sufficient to reliably ensure that the bridge could handle a 500-year earthquake (with little to no damage) or a 2,500-year earthquake (with no collapse). Therefore, any alternative that involves the seismic retrofitting of the existing bridge does not meet the program’s Purpose and Need statement.” For reference, see Page 6 of https://www.interstatebridge.org/media/qxwnqcnz/memo-csaii_remediated.pdf

DISTORTION OF PURPOSE AND NEED

The original purpose and need statement says: “Seismic vulnerability: The existing I-5 bridges are located in a seismically active zone. They do not meet current seismic standards and are vulnerable to failure in an earthquake.”

See 2011 ROD at
<https://data.wsdot.wa.gov/accountability/ssb5806/Repository/7_Project%20Delivery/CRC%20First%20Phase/CRC_ROD.pdf>
https://data.wsdot.wa.gov/accountability/ssb5806/Repository/7_Project%20Delivery/CRC%20First%20Phase/CRC_ROD.pdf

The DSEIS says: “The text of the Purpose and Need has not been edited from its original wording, with the exception of references to the name of the Program.” See
<https://www.interstatebridge.org/media/sh4hmeui/chapter-1-purpose-and-need.pdf>
https://www.interstatebridge.org/media/sh4hmeui/chapter-1-purpose-and-need.pdf

Yet on page 3, it says: “Seismic vulnerability: The existing Interstate Bridge is located in a seismically active zone. It does not meet current seismic standards and is vulnerable to failure in an earthquake.”

So yes, the Purpose and Need no longer references I-5, despite the claim that it is unchanged. The CSA-II proposal does not use the existing bridges for I-5, and constructs a new I-5 bridge that meets all applicable standards. So yes, the CSA-II not only addresses the seismic need, but fully meets it for I-5, as described in the original language.

It is obvious that the Purpose and Need demands an I-5 crossing that improves the seismic resilience of I-5. It does not demand that the existing bridges be brought up to current seismic standards. After all, in the LPA or Selected Alternative, the existing bridges are eliminated!

CSA-II Reduces significant environmental impacts relative to LPA

The 2011 Record of Decision deemed the LPA to be the environmentally preferable alternative because "[c]ompared to the other build alternatives, the SA [Selected Alternative] has the most environmental categories in which it is the least impactful alternative." But the least impact in the most categories is not the same thing as least impact overall.

The CSA-II has a much lower elevation and a modest footprint. It utilizes much of the existing infrastructure, with moderate, safer grades. Local traffic moving between Hayden Island and Vancouver does not intermix with interstate traffic, avoiding many of the lane and speed changes required for merging and exiting, allowing interstate traffic to flow more freely.

What is it that caused the "Locally Preferred Alternative" to propose unsafe steep grades and massive, high-elevation, unsafe, noisy interchanges on the Vancouver side of the river? The BNSF Railway line, adjacent to the north bank of the Columbia, is the cause. In order to go over the railway, as the "Locally Preferred Alternative" proposs, I-5 would have to clear the rail line by a minimum of 23 and a half feet. But going over the railway is not necessary! The current freeway alignment goes under the railway. Keeping the I-5 alignment under the railway avoids the high costs as well as many of the problems with the proposed reconstruction of Vancouver interchanges. The CSA-II also creates opportunity to expand rail capacity across the BNSF Railway Columbia River bridge, which will facilitate movement of freight and passengers.

While the CSA-II has only a 72-foot river clearance at its highest point, it compensates for this lower height with its bascule draw span, which imposes no new restriction on the height of river traffic, greatly reducing these problems as well as the cost of the project. And since the CSA-II's bascule draw span is lined up with the existing lift spans, with their 178-foot clearance, that will be the height limitation as long as the existing bridges remain in place. Finally, since the CSA-II has a lower height than the LPA, it does not interfere with aviation from Pearson Field, and does not require distortion of the I-5 pathway. The LPA, in a convoluted attempt to avoid conflict with Pearson Field, required increased curvature and increased project expense.

CSA-II would be more responsive to the US Coast Guard request for analysis of an alternative that retains or exceeds the current vertical navigation clearance.

The US Coast Guard's Preliminary Navigation Clearance Determination (PNCD), dated June 17, 2022, says on page 6:

"Any proposed new bridge should have a VNC [vertical navigation clearance] of greater than or equal to that of the existing I-5 twin bridges of 178 feet or preferable, unlimited VNC, as well as a HNC as permitted during the final USACE 408 permit. There are alternative options to accomplish this VNC to include a tunnel or a high-level lift bridge or bascule bridge, which would provide an unlimited vertical clearance. A modern similar

successful project is the Woodrow Wilson Bridge over the Potomac River in Washington, DC that was completed in 2009. It is a higher-level double bascule lift bridge on an interstate (I-95) with transit."

Given the Coast Guard request for an alternative that provides at least 178 feet of river clearance, it is irresponsible that IBRP has chosen not to even consider a movable span design that that follows the existing freeway grade and goes under the BNSF rail embankment.

Initially, it appeared that the IBRP would simply ignore the Coast Guard's PNCD. However, the US Coast Guard sent a letter dated February 8, 2023 to the IBRP in response to the IBRP publication of a Notice to Supplement in the Federal Register. The letter asked for an alternative that meets the PNCD:

"Including only one alternative in the Supplemental Environmental Impact Statement (SEIS) introduces risk that no permittable alternative will be evaluated in the SEIS. It is my sincere hope that the SEIS will include evaluation of an alternative that meets the preliminary navigation clearance determination (PNCD) requirement of 178 feet."

See page 4 of:

<https://www.interstatebridge.org/media/jvmdkbcb/uscg-comments-and-fhwa-fta-response-nts.pdf>
https://www.interstatebridge.org/media/jvmdkbcb/uscg-comments-and-fhwa-fta-response-nts.pdf

The IBRP response has seemingly been to thumb its nose at the Coast Guard by providing a movable span that is merely grafted onto their favored bridge design without regard for the cost savings and reduced environmental impact that would result from optimizing the design to best utilize the benefits of a movable span. While the CSA-II would have been a logical starting point for obtaining greater river clearance with lower cost and less environmental impact, it appears that IBRP wishes to make their movable span option as infeasible and unattractive as possible, and failed to develop a reasonable movable span alternative (or "design option").

Note that the IBRP has similarly refused to optimize the design of a tunnel alternative that would also meet the Coast Guard's clearance requirements, as staff kept insisting that it was impossible to connect a tunnel with SR-14 because the freeway could not go under the BNSF rail embankment. Although page 19 of the Sept. 18, 2023 "Tunnel Concept Assessment" (or pdf page 1381 of SDEIS appendix D) describes two possible techniques for constructing connections to a theoretical immersed tube tunnel, it is not clear whether they still maintain that a connection to SR-14 is impossible.

IBRP has not done any similar analysis for a low-level movable span alternative. We believe that IBRP has no study or document showing that it is not possible to construct a new upstream 8-lane opening-span low-level bridge carrying all I-5 traffic that connects north under the east-west BNSF Railway railroad tracks to I-5 and SR-14. There are numerous well-known techniques for going under an existing railroad embankment without shutting down railroad traffic for multiple days. Furthermore, BNSF Railway has alternative trans-continental routes and would likely entertain offers of financial compensation for rerouting rail traffic for limited periods, if that would simplify construction.

We now know that traffic forecasting errors made by the IBRP will also make it impossible for the US Coast

Guard to determine the reasonable needs of surface transportation.

CSA-II was not given a credible evaluation:

When the CRC was revived as the IBRP, public comments asked that the CSA-II concept be considered, due to the huge cost and impact of the CRC Selected Alternative.

IBRP staff engaged staff and consultants to write an analysis of why the CSA-II concept did not need further study. Notably, neither IBRP staff nor their consultants actually studied the CSA-II concept. Instead, they made false claims that the CRC had already done sufficient studies, based on their review of CRC documents. The authors mistakenly conflated the RC-8 component from the CRC Component Screening process with the CSA-II concept and relied on defective analysis of RC-8 from the CRC screenings, particularly the suspicious "Additional Components Screening" document.

This consultant analysis was presented to the Executive Steering Group at their Sept. 15, 2021 meeting. For reference, see meeting presentation:

<https://www.interstatebridge.org/media/5fkgfbkb/ibr-esg-presentation-9-15-21_remediated.pdf>
https://www.interstatebridge.org/media/5fkgfbkb/ibr-esg-presentation-9-15-21_remediated.pdf

In the presentation, the section entitled "Re-Confirming Bridge Replacement as the Corridor Solution" said:

"Common Sense Alternative II

• Would not address safety and congestion in the I-5 corridor

• Transit, bikes, pedestrians, and local traffic would remain on existing bridge

• Bridge lifts would continue at the Interstate Bridge

• Seismic vulnerability would remain for the Interstate Bridge

Conclusion

? In summary, the analysis and screening conducted on these

potential solutions during the previous project is still valid

? The dismissed alternatives do not meet the Purpose and Need

for the IBR program and will not be given additional

consideration"

Of the four findings regarding the Common Sense Alternative II, the first, about safety and congestion is obviously false, since the CSA-II provides two additional lanes of motor vehicle capacity in each direction, and provides a superior pedestrian and biking facility and a new transit pathway in contrast to the No-Build alternative. The other three conclusions are correct but incomplete. All three issues would be vastly improved in comparison with the No-Build alternative.

The conclusion is totally wrong, since the CSA-II was not evaluated by the CRC project and it does meet the Purpose and Need as described above.

The presentation provided a link for locating a cover memo on the IBR web site,

https://www.interstatebridge.org/media/kqzlbxzb/solutions-cover-memo_remediated.pdf

as well as a memo specifically about the CSA-II concept.

https://www.interstatebridge.org/media/qxwnqcnz/memo-csaii_remediated.pdf

AORTA submitted a rebuttal to IBRP staff and the IBRP steering group advising them of this incorrect information and debunking claims made in the presentation to the Steering Committee. IBRP staff acknowledged the rebuttal, but it was not responsive to the specific criticisms of the AORTA memo. The AORTA memo follows these comments as Appendix A, and the IBRP response follows as Appendix B. All pages of the AORTA memo should be considered as commentary on the SEIS process.

Despite the AORTA rebuttal, IBRP staff continued to make false assertions that the CSA-II did not meet the Purpose and Need and had been extensively studied.

During the October 27, 2021 Bi-State Committee meeting, Washington Representative Sharon Wylie, Washington, asked about other ideas that would be left behind, and the need for transparency about why.

IBRP Program Administrator Greg Johnson replied:

"Understood. We have answered some of those questions, you heard our conversation regarding the immersed tube tunnel idea, we talked about the Common Sense Alternative, we talked about high speed rail corridor in this corridor, and once again those are all fantastic ideas, but they do not fit the context here, and I like to be as creative and innovative as anybody, but these ideas do not fit the context, they actually cause more impacts, and as I said earlier, part of the purpose of the NEPA process is to avoid impacts rather than mitigate impacts. When you have something that you can't get around, that's when you get into mitigation. So some of these would have more impacts than the solutions that are put on the table for you now. But we'd be more than happy to give a summary once again of all those ideas and why they don't meet purpose and need, and we know we have critics who come to every public speaking opportunity to say we haven't looked at it, but they are incorrect, we've looked at these ideas in tremendous depth."

For reference, see
<https://olis.oregonlegislature.gov/liz/mediaplayer?clientID=4879615486&eventID=2021101020&startStreamAt=8653>
https://olis.oregonlegislature.gov/liz/mediaplayer?clientID=4879615486&eventID=2021101020&startStreamAt=8653

Program Administrator Johnson is incorrect when he says "…we've looked at these ideas in tremendous depth." They really haven't considered the CSA-II in any depth at all.

APPENDIX A: AORTA Rebuttal:

TO: IBRP Executive Steering Group

FROM: James Howell, Douglas R. Allen, AORTA Directors

DATE: September 20, 2021

SUBJECT: Rebuttal of Sept. 15 presentation to ESG regarding Common Sense Alternative II (CSA-II)

This memo rebuts the material presented at the Sept. 15, 2021 IBRP Executive Steering Group (ESG) meeting, which comprised a cover memo1, a specific memo2 about the CSA-II, and a slide presentation3.

To set the context for this rebuttal, we highlight the following declarations of the IBRP team (see pages 11-14 of slide presentation):

Purpose and Need:

An alternative must address the transportation needs of the

I-5 corridor/bridge:

• Growing travel demand and congestion

• Impaired freight movement

• Limited public transportation operation, connectivity, and reliability

• Safety and vulnerability to incidents

• Substandard bicycle and pedestrian facilities

• Seismic vulnerability of the I-5 bridge

Key IBRP "findings":

Common Sense Alternative II

• Would not address safety and congestion in the I-5 corridor

• Transit, bikes, pedestrians, and local traffic would remain on existing bridge

• Bridge lifts would continue at the Interstate Bridge

• Seismic vulnerability would remain for the Interstate Bridge

This rebuttal memo will use the "Locally Preferred Alternative" (LPA) selected by the prior CRC process for comparison where necessary. We assume that the IBRP memos referenced above are making a similar comparison, although that is unclear.

What is the essence of the Common Sense Alternative II (CSA-II)?

(See <https://www.youtube.com/watch?v=gv0W5ApNiSo> https://www.youtube.com/watch?v=gv0W5ApNiSo for full narrated explanation.)

The primary component is a new 8-lane freeway bridge for I-5, replacing the I-5 motor vehicle travel functions of the existing Interstate Bridges. This is not a "supplemental" bridge, but is the primary constructed feature of the CSA-II. It would be located immediately upstream of the existing bridges, have a 72-foot river clearance at the highest point, in-line and with river clearance identical to the existing Interstate Bridges, and would have a bascule opening span in line with the lift spans of the existing Interstate Bridges.

This new bridge would be built to current seismic standards, eliminating the risk of traffic disruption resulting from the most massive earthquake for which current design standards have been set.

The new bridge would have three standard freeway through lanes in each direction, plus a supplemental outside lane in each direction to reduce congestion caused by entering and exiting traffic in the vicinity of the bridge.

Another important component of the CSA-II eliminates the need for bridge lifts for commodity barge traffic. Currently, despite the 72-foot river clearance in the middle of the existing bridges, under which all commodity barge tows can fit, the opening in the downstream BNSF Railway bridge does not line up with that high point, so a significant amount of barge traffic requires the existing Interstate Bridges to be opened to allow for a safer direct path, especially in higher water conditions. To solve this problem, the CSA-II includes a new lift span on

the BNSF Railway bridge.

Neither of these components is novel or un-vetted by experts. Well before the prior CRC process began, in order to reduce bridge lifts on I-5, the Columbia River Towboat Association and the business group Identity Clark County proposed installing a new lift span on the BNSF Railway bridge to line up with the high spans of the existing Interstate Bridges. This concept was vetted by the US Coast Guard, which declared the existing railroad swing span a hazard to navigation, and which has the authority to compel cooperation by the BNSF Railway in ameliorating the problem. In 1989, a swing span over the Willamette River (known as Bridge 5.1), on the same rail route, was replaced with a lift span, improving navigation as well as rail operation.

Also, during the CRC process, the Metro Council adopted a resolution asking the CRC to analyze options that included fixing the BNSF Railway bridge, but the resolution was ignored by CRC staff.

The other main component of the CSA-II is retention of the existing Interstate Bridges for local traffic, pedestrians, bicycles, and transit.

Note that with the CSA-II, bridge lifts would be minimal, and not occur during peak times. River traffic exceeding the 72-foot clearance occurs on rare occasions, and can be scheduled. Likewise, maintenance lifts can also be scheduled outside peak times. A new opening span on an Interstate highway has a clear precedent in the Woodrow Wilson bridge on I-95 (Capital Beltway) over the Potomac River.

Given this description of the CSA-II, it is disturbing that the IBRP team claims that the CSA-II "would not address safety and congestion in the I-5 corridor."

The following list of issues points out several places where the IBRP material has gone wrong in its attempt to discredit the CSA-II:

1. Bridge lifts do not violate the Purpose and Need Statement, per se. Safety, vulnerability to incidents, and impairment of freight movement can be addressed by multiple components of a project, including a reduction in bridge lifts from the current frequency. This was made explicit during the CRC process from which the current Purpose and Need Statement has been continued without change.

2. The lifecycle costs of maintaining the existing Interstate Bridges are unknown. Speculative claims, without analysis, don't help.

3. The CSA-II provides complete seismic safety for I-5 through construction of a new bridge. This new bridge could provide temporary transit, pedestrian, bicycle, and local traffic connections if needed after a seismic event. The wisdom of any seismic upgrades to the existing Interstate Bridges should be based on a competent economic analysis.

4. Land use - The footprint of the CSA-II is likely much smaller than the LPA.

5. Construction costs are not part of the Purpose and Need statement, and should be based on competent analysis of a comprehensive solution, not fragmentary speculation about the cost of individual components.

6. Natural Resources - The effect on natural resources is determined through an Environmental Impact Statement (EIS) or Supplemental Environmental Impact Statement (SEIS) governed by the National Environmental Policy Act (NEPA) and associated regulations. Given that any bridge piers in the CSA-II will be in alignment with the existing Interstate Bridge piers, the environmental significance of these, especially beyond the construction phase, will require competent analysis, not speculation. Neither the CSA-II nor the CRC option (RC-8) that the IBRP team seems to conflate with the CSA-II were analyzed in the EIS for the CRC.

7. While marine navigation is not part of the Purpose and Need, the CSA-II, as described above, significantly improves marine navigation and removes an identified hazard. In discussing the issue of replacing the railroad swing span, much of the IBRP team memo is simply a distraction from the basic question of whether the CSA-II meets the Purpose and Need statement. It makes the obvious statement that the rest of the BNSF Railway bridge may be seismically vulnerable. This fact is deserving of analysis, such as whether public investment in one component of that bridge makes economic sense or could help prevent the environmental disaster of a fuel barge crashing into one side of the narrow swing span channel. Blanket dismissal seems irresponsible, yet the memo argues that the Oregon and Washington Departments of Transportation might not want to pay for fixing the railroad bridge, and appears to argue for maintaining the existing hazardous narrow swing span channel on the railroad bridge.

8. The IBRP team material incorrectly represents the new I-5 freeway bridge component of the CSA-II. It is not a "supplemental" bridge, but is the actual I-5 crossing between Hayden Island and Vancouver, built to full Interstate Highway standards, with four lanes in each direction. It would carry C-Tran express buses, but not light rail or a bus connection to a light rail terminus on Hayden Island. In its discussion of re-purposing the existing Interstate Bridges, the IBRP team references arguments from CRC documents that assume continued use of the old bridges for I-5 traffic. That concept is not part of the CSA-II.

9. The IBRP team memo conflates the "RC-8" river crossing option from the prior CRC, with the new CSA-II bridge, yet suggests that it does not meet the project Purpose and Need, despite the fact that RC-8 was identified as meeting the Purpose and Need of the CRC, which is the same Purpose and Need Statement adopted by the IBRP.

Pages 3 and 4 of the specific memo2 gloss over what happened in the CRC "Step A Screening" process. This memo implies that RC-8 is essentially the same as the new I-5 bridge proposed in the CSA-II. Later, on pages 6 and 7, the memo admits that RC-8 passed the Step A Screening process, meaning that it met the Purpose and Need of the project. The relevant CRC document declares: "Staff Recommendation: Advance RC-7 through RC-9".

See page 3-4 of
<https://wsdot.wa.gov/accountability/ssb5806/docs/6_Project_Development/Alternative_Development/StepAScreening.pdf>
https://wsdot.wa.gov/accountability/ssb5806/docs/6_Project_Development/Alternative_Development/StepAScreening.pdf

Also see

<https://wsdot.wa.gov/accountability/ssb5806/docs/6_Project_Development/Alternative_Development/AdditionalComponentScreening.pdf>
https://wsdot.wa.gov/accountability/ssb5806/docs/6_Project_Development/Alternative_Development/AdditionalComponentScreening.pdf

During the CRC process, RC-8 inexplicably received scores of "unknown" for the question as to whether it improved safety and vulnerability to incidents, and the question of whether it reduced the seismic risk of the I-5 Columbia River Crossing. Perhaps this is because RC-8 was understood to be a "supplemental" bridge, carrying only one direction of I-5. The CSA-II full I-5 new bridge obviously improves safety and reduces seismic risk of the I-5 crossing.

In any case, subsequent to the CRC Step A Screening process, CRC staff decided to jettison all moveable span options. By citing the "unknown" scores, and then comparing moveable span options to fixed span options rather than to the "no-build" option, staff presented the no-brainer fact that a fixed span would have less impact from bridge openings than a moveable span, however infrequent and off-peak those openings might be. They also claimed that all moveable spans increase risk to marine navigation. This claim depends on their refusal to consider ameliorating the swing span on the BNSF Railway bridge. This information was presented by the CRC staff as conclusions, and supporting analysis has not been supplied.

Therefore, by fiat, CRC staff removed RC-8 after it passed the Step A Screening process, and before the Step B Screening process was undertaken. Given the significant differences between the CSA-II proposal for a new I-5 freeway bridge, and the previously rejected RC-8, there is all the more reason to conduct an analysis of the CSA-II proposal under a NEPA SEIS or new EIS

Furthermore, RC-8 was designed with a 65-foot river clearance, seven feet lower than the existing Interstate Bridges, biasing the CRC analysis that RC-8 failed to reduce bridge lifts enough.

10. By eliminating a full Hayden Island Interchange, the CSA-II eliminates at least 6 lanes of roadway width and millions of dollars in construction cost, occupying far less total land on Hayden Island than the LPA. How is this accomplished? By re-using the existing Interstate Bridges for local traffic, in combination with a supplemental Portland Harbor Bridge for LRT and local traffic (as included in the CRC LPA). The IBRP team's statement that "...it is reasonable to assume that reuse alternatives generally consume considerably more land compared to replacement options..." is demonstrably false in the case of the CSA-II proposal.

11. The IBRP memo conclusions regarding re-use of the existing spans are mostly speculative, and misrepresent the CSA-II proposal. The IBRP memo states that "...any alternative that does not address the seismic deficiencies of the existing Interstate Bridge would not meet the program’s Purpose and Need statement." This ignores the fact that the CSA-II does not use the existing Interstate Bridges for I-5. The new I-5 bridge envisioned in the CSA-II meets the requirement in the Purpose and Need Statement that "seismic vulnerability of the I-5 bridge" be addressed.

Also, notably, at the DEIS phase of the CRC, two options that re-used the existing Interstate Bridges for northbound I-5 traffic only, were included for analysis. These options included seismic upgrades to the existing bridges.

The CSA-II is agnostic regarding the economic value in retrofitting the existing Interstate Bridges, given that the new I-5 bridge would ensure transportation connectivity in the event of a major earthquake. Still, the memo's un-referenced claim that "Subsequent evaluations of seismic retrofitting have determined that seismic retrofits would be prohibitively expensive..." is suspect and speculative, given the previously published analysis of seismic retrofitting developed by the CRC. No analysis has been done regarding the actual extent of retrofitting that would make economic sense for the existing Interstate Bridges, given their re-purposing so they no longer carry I-5 traffic.

12. In doing a cost-benefit analysis, which we must point out is not a factor in meeting the requirements of the Purpose and Need Statement, any life-cycle costs of retaining the existing Interstate Bridges must be weighed against both the demonstrable cost savings of the CSA-II compared with the LPA, as well as the intangible benefits of the CSA-II compared with the LPA.

13. The much lower profile of the CSA-II I-5 freeway bridge, as compared with the LPA, has huge benefits. On the Washington shore, for the high LPA bridge, the controlling factor is the height of the BNSF Railway that runs parallel to the north shore of the Columbia. The existing I-5 lanes travel under the BNSF Railway, as they would also do under the CSA-II. Given that the railroad is on fill perhaps 20 feet above ground level, then adding the necessary 24 feet of clearance above the railroad, then perhaps 20 feet for the lower deck of the LPA (the CSA-II main I-5 bridge is a single deck), means that the LPA soars past downtown Vancouver at the height of a six-story building. The CSA-II would be at ground level, the same as the existing I-5, past downtown. Certainly the railroad is not going to be moved under any circumstances.

Despite this significant difference between the CSA-II river crossing and the LPA, the IBRP memo appears to rely on a CRC analysis of shore-side impacts on the Vancouver side of the river, that if applied to the CSA-II, is demonstrably false:

"One of the potential concerns when comparing river crossing options is that the higher elevation options could potentially have more significant impacts at the onshore bridge approaches in Vancouver and on Hayden Island when compared to lower elevation, moveable span options. However, the design development of the low- and mid-level options has resulted in a relatively minor difference of elevation of about 15 feet at mid-span (as noted above, the low-level bridge would be at about 80 ft above the water, and the mid-level span would be at about a 95 ft. elevation). The difference in elevation would generally be progressively less as you move away from the river, resulting in relatively minor differences in elevation at the Vancouver and Hayden Island approaches. As a result, the potential on-shore impacts can be viewed as approximately equivalent for the low and mid-level options." See page 3 of <https://wsdot.wa.gov/accountability/ssb5806/docs/6_Project_Development/Alternative_Development/AdditionalComponentScreening.pdf>

https://wsdot.wa.gov/accountability/ssb5806/docs/6_Project_Development/Alternative_Development/AdditionalComponentScreening.pdf

While the CRC analysis concedes a potential advantage in having a moveable span, it dismisses that advantage by stating that as a result of their "...design development..." "...the potential on-shore impacts can be viewed as approximately equivalent for the low [moveable span] and mid-level [fixed span] options."

Let us be clear here: The CRC did not study the CSA-II option of a new I-5 bridge, but instead studied a range of "supplemental" bridges that would have carried only one direction of I-5, retaining the existing Interstate Bridges for the other direction. In no way would the CSA-II have on-shore impacts that are "approximately equivalent" to that of the CRC LPA, as shown above. What the CRC studies did clearly show, was that a new upstream bridge with a moveable span could be a component in meeting the Purpose and Need of the project.

14. The August 31 memo from the IBRP team entitled "CONTEXT FOR REVIEW OF SOLUTIONS THAT DO NOT MEET THE PURPOSE AND NEED FOR AN INTERSTATE-5 REPLACMENT BRIDGE" begins with this assertion: "When restarting the Interstate Bridge replacement work in 2019, there was clear direction from the governors of Oregon and Washington as well as the bi-state legislative committee that the program should utilize past work from the previous project that remains valid [emphasis added] to maximize past investment and ensure efficient decision-making, while also taking into consideration changes since the previous planning effort."

15. The memo specific to the CSA-II states: "The evaluation conducted under CRC of the group of components comprising the CSA II is still valid. The needs for the program have not changed, and the CSA II would not meet the program’s Purpose and Need statement."

This is false. The CRC never conducted a valid evaluation of either all individual components of the CSA-II, or the functional grouping of components that the CSA-II comprises. Furthermore, the CSA-II demonstrably does meet the IBRP Purpose and Need statement.

16. The CRC LPA was a design failure: Too high past downtown Vancouver, too low over the Columbia River, too wide over Hayden Island, excessively steep for bicycles, pedestrians, and light rail, and too expensive. The current IBRP plans are based on past failure, and stubbornly sticking to that past failure seems like a recipe for future failure.

The CSA-II demonstrates that there are remedies for many of the problems of the LPA. If the IBRP team would consider an alternative based on the CSA-II components, and engage in a good-faith analysis and refinement,

they might well achieve the sort of affordable success that this region is hoping for.

Footnotes:

1. Cover Memo: <https://www.interstatebridge.org/media/kqzlbxzb/solutions-cover-memo_remediated.pdf> https://www.interstatebridge.org/media/kqzlbxzb/solutions-cover-memo_remediated.pdf

2. Memo specific to CSA-II: <https://www.interstatebridge.org/media/qxwnqcnz/memo-csaii_remediated.pdf> https://www.interstatebridge.org/media/qxwnqcnz/memo-csaii_remediated.pdf

3. Slide presentation shown at Sept. 15, 2021 ESG meeting: <https://www.interstatebridge.org/media/5fkgfbkb/ibr-esg-presentation-9-15-21_remediated.pdf> https://www.interstatebridge.org/media/5fkgfbkb/ibr-esg-presentation-9-15-21_remediated.pdf

APPENDIX B: IBRP response to AORTA rebuttal (above) that does not address points raised.

From: "Greg Johnson" <[redacted]

Date: Thursday, October 7, 2021 5:03 PM

To: Doug Allen

Subject: IBR Response to D. Allen email dated 9/22/21: Rebuttal of IBRP presentation to ESG

Dear Mr. Allen,

Thank you for your recent comments to some of the Executive Steering Group members regarding the program memo about options that do not meet Purpose and Need. Your comments were forwarded to the program for review and a response.

The IBR program completed a thorough review of the CSA II and presented the findings of the analysis at the September Executive Steering Group and Community Advisory Group meetings. The CSA II does not meet the Purpose and Need and is technically infeasible and incomplete. More details about the technical findings can be found in the Screening and Evaluation of the “Common Sense Alternative II memorandum.

In 2004, the Columbia River Crossing (CRC) project was formed by the Washington and Oregon Departments of Transportation to address I-5 corridor transportation issues identified by regional leaders through long-range planning studies. The intent of this project was to improve safety, reduce congestion, and increase mobility of motorists, freight traffic, transit riders, bicyclists, and pedestrians.

In the summer 0f 2008 a Locally Preferred Alternative (LPA) was selected. In 2011, a Final

Environmental Impact Statement (EIS) was published, and a project Record of Decision (ROD) was issued by the Federal Highway Administration (FHWA) and Federal Transit Administration (FTA). After the ROD was published, the LPA was refined to include a phasing plan and to comply with the U.S. Coast Guard's issued bridge permit. In 2013, FHWA and FTA approved two NEPA re-evaluations that formally amended the LPA.

The previous project's Record of Decision from the prior NEPA process, which includes a replacement bridge, high capacity transit and improvements to five interchanges, is still valid. However, many changes to the physical, environment, regulatory context, local jurisdiction and community priorities have shifted since 2013.

The IBR program will be analyzing a replacement bridge solution that incorporates design options to addresses these changes since the previous planning effort. The program believes that this approach to identify new design options for the IBR solution that address changes that have occurred, while incorporating actionable commitments to climate and equity, is the most effective way to keep the program moving forward and address the shared interests of the program, agency partners, and the community.

Sincerely,

Greg Johnson

Interstate Bridge Replacement Program

Program Administrator

[redacted]

[redacted]

interstatebridge.org

APPENDIX C: Visual Description of CSA-II in attached pdf file:

p.1 All 5 paragraphs; p.2 BNSF Bridge 9.6; p.3 BNSF Willamette River Bridge; p.4 Barge traffic patterns; p.5 Lifts vs. Vessel Height; p.6 Barges with CSA-II; p.7 Existing clearance profile; p.8 CSA-II overview from Vancouver; p.9 Existing Vancouver interchanges; p.10 Proposed CSA-II interchanges; p.12 Existing Hayden Island interchange; p.13 CSA-II Hayden Island; p.14 New Portland Harbor bridge; p.15 CSA-II Marine Drive interchange improvement; p.16 Existing Marine Dr. interchange; p. 17 CSA-II Marine Dr. interchange improvement; p.18 CSA-II possible concept; p.19 Woodrow Wilson I-95 Bridge.

THE END OF AORTA COMMENTS SUBMITTED BY

DOUGLAS ALLEN, AORTA Portland Area Vice President

A Common-Sense Alternative

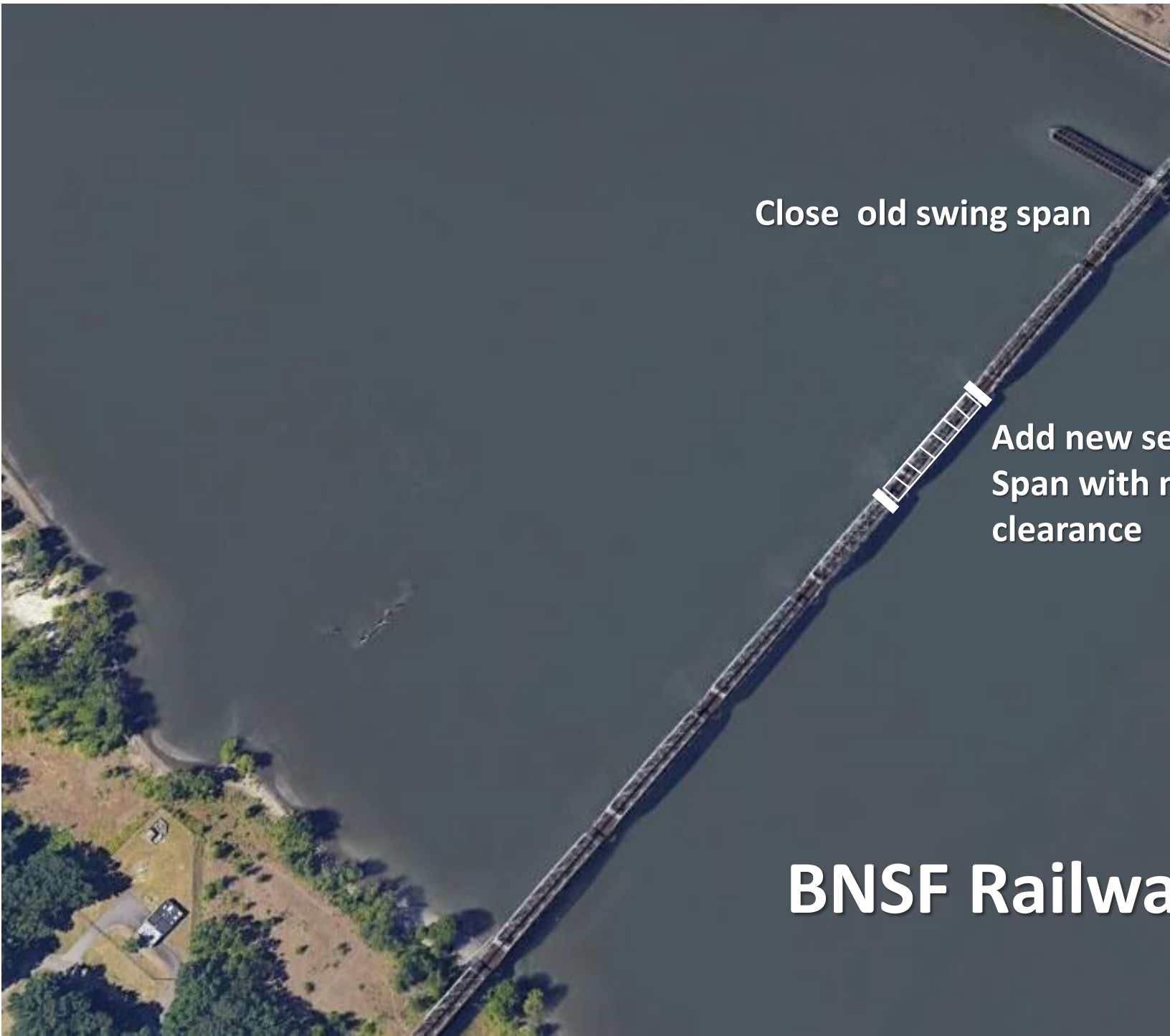
The Common-Sense Alternative is an economical and seismically sound
It would eliminate the need to replace full interchanges on Hayden islan
and would allow bridge lifts by at least 90%. It would meet the projects

- Relocate and Install a lift span in the railroad bridge downriver from t
  This would allow all barge traffic to navigate under the high spans of
  reducing the number of lifts on I-5;

- Construct a new eight-lane freeway bridge with a bascule opening th
  existing bridge. This bridge would accommodate river traffic of any h
  well with existing Interstate-5 approaches. I-5 can continue to cross b
  low profile solves many of the engineering challenges of the IBR;

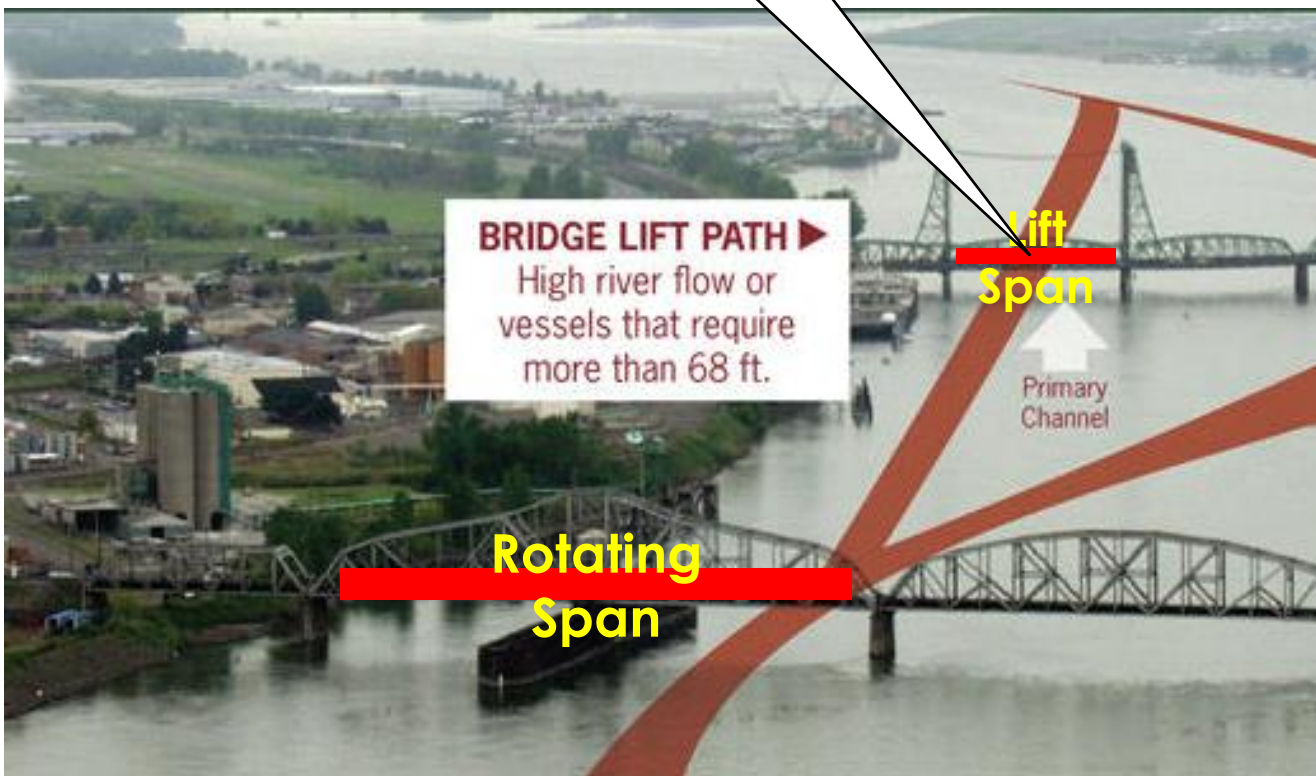
- Repurpose the existing Interstate Bridge for Light Rail, Local Hayden I
  It can be replaced in the future with a seismically sound bridge to ma

- Build a new bridge over the South Channel for light rail, local traffic a
  can be moved from the Existing Bridge providing space there for an "
  Island. The CSA also eliminates the short and dangerous MLK - Marin


Close old swing span
Add new se
Span with r
clearance
BNSF Railwa

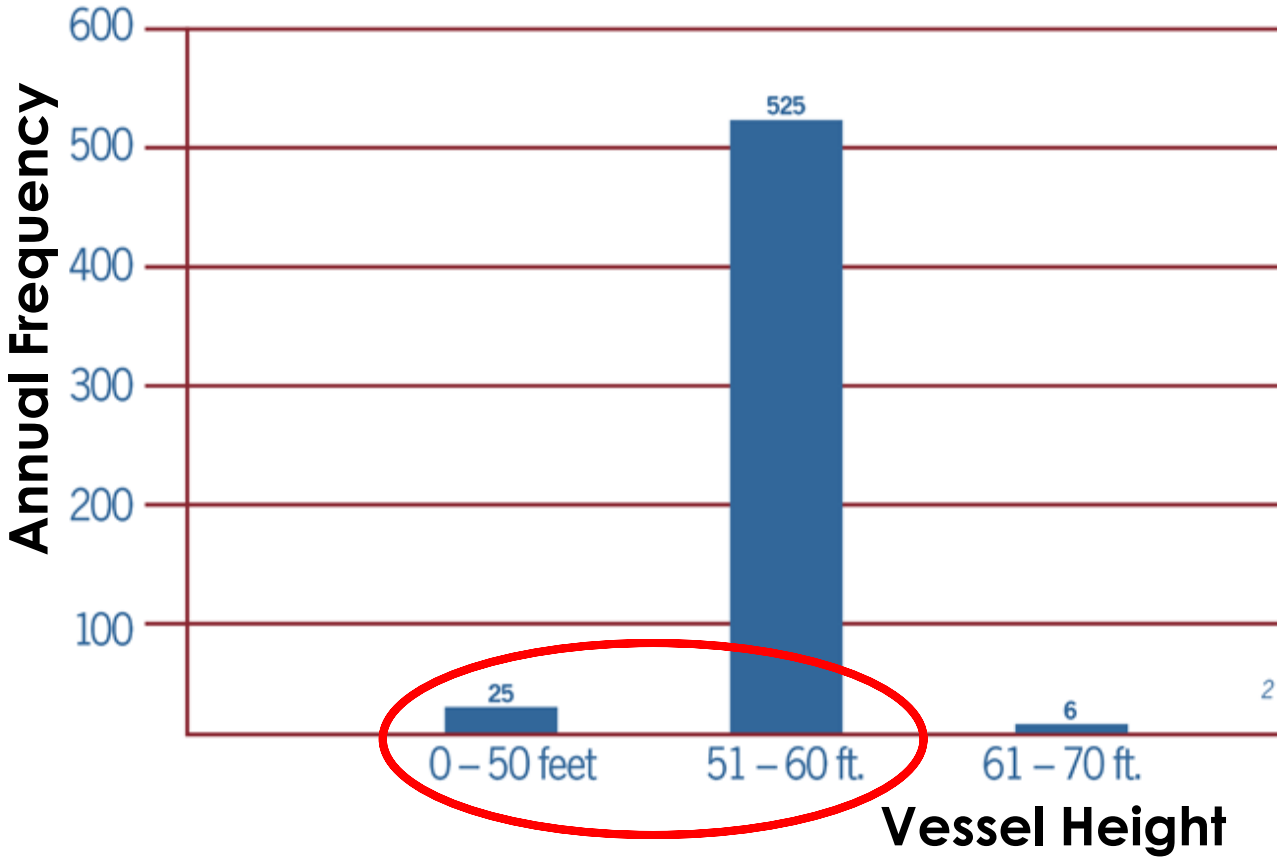
550 Annual
I-5 Lifts for Vessels
Under 60' Height

70' Clear
Under

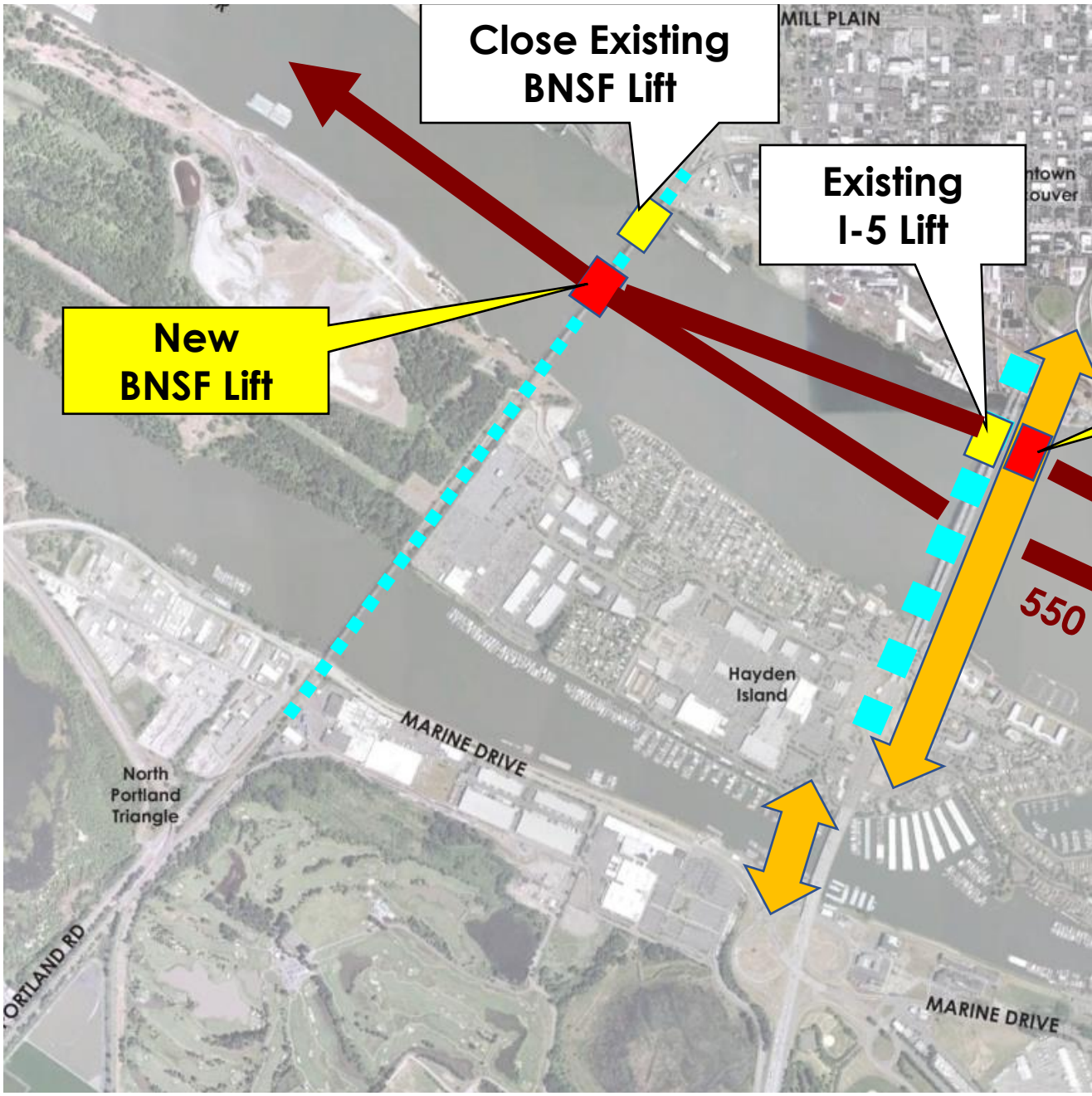


Existing Barge Traffic

(Over 550 unnecessa



I-5 Bridge Lift Frequency (200



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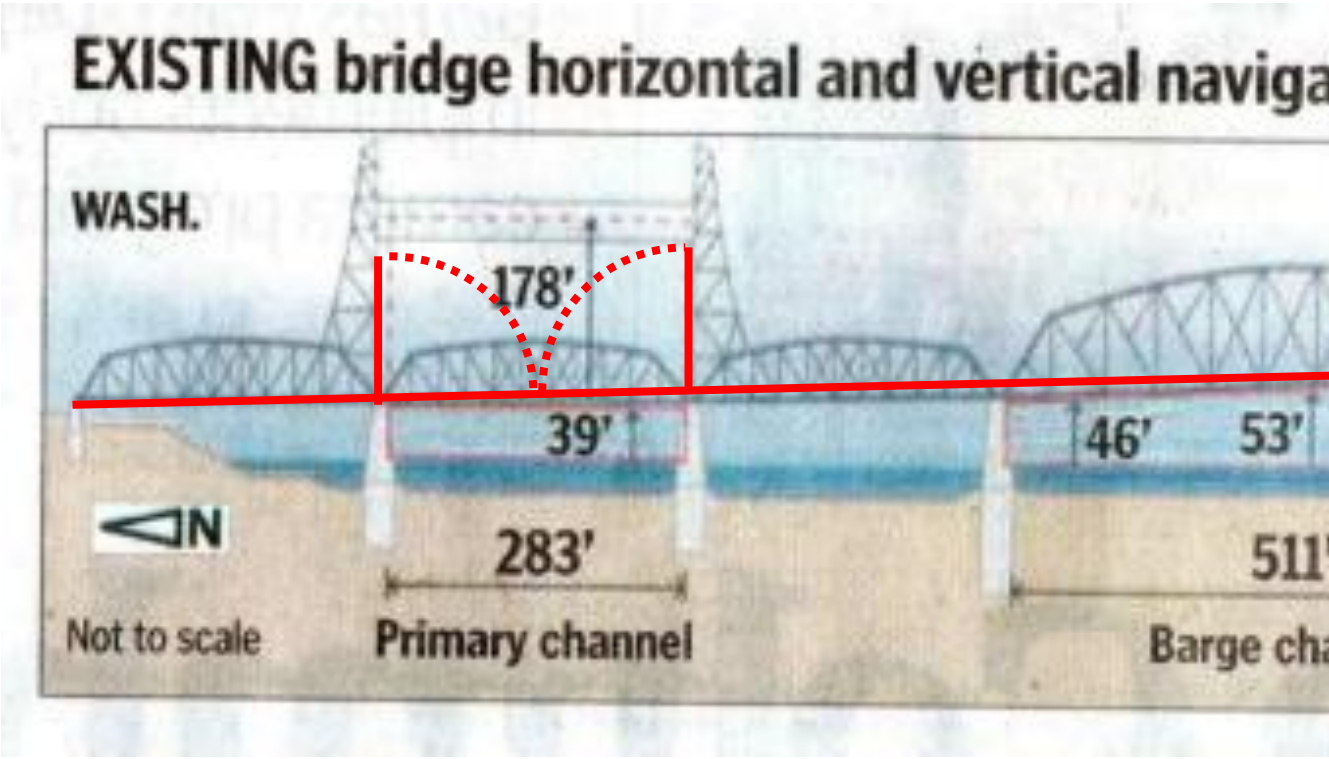

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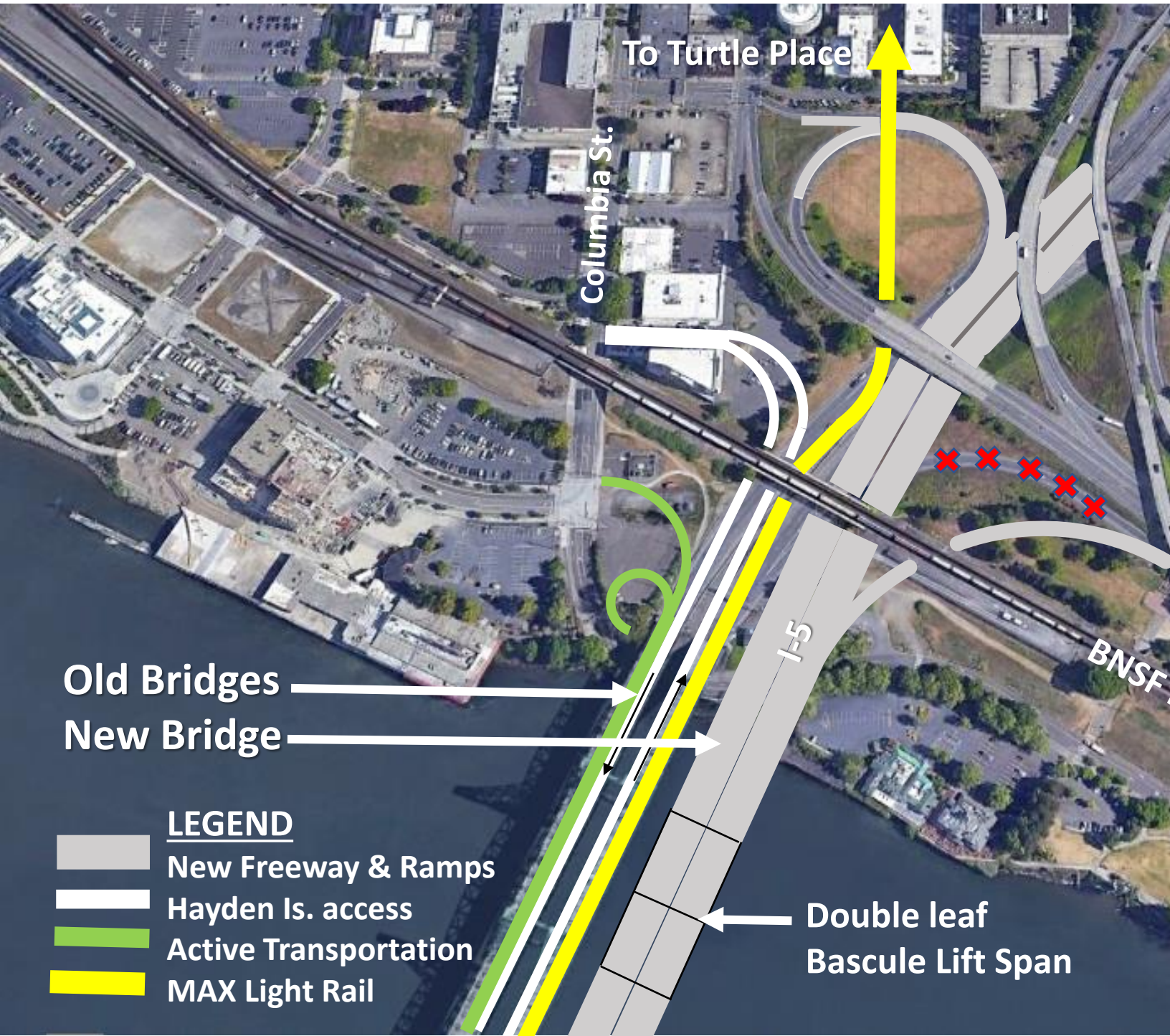
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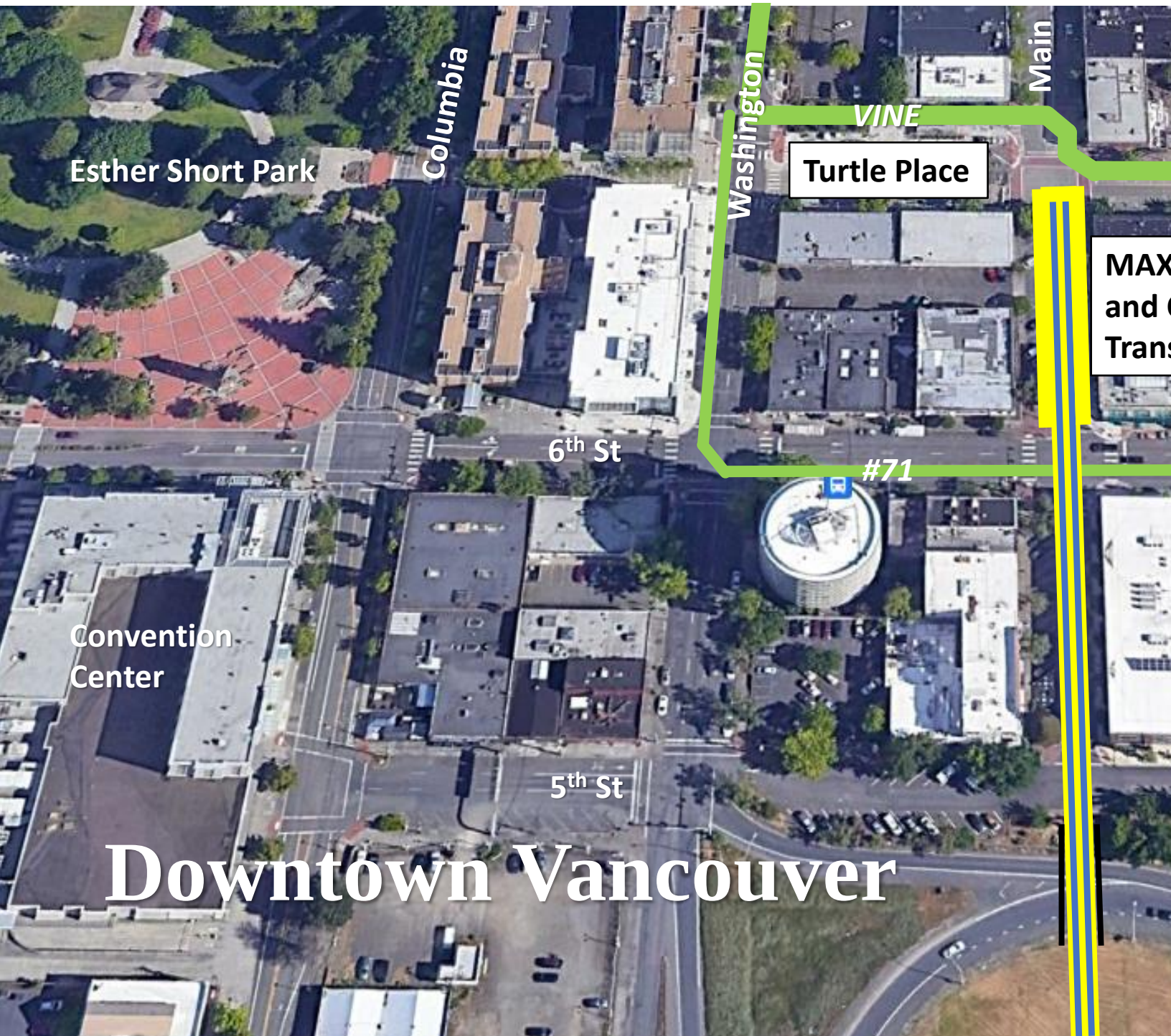
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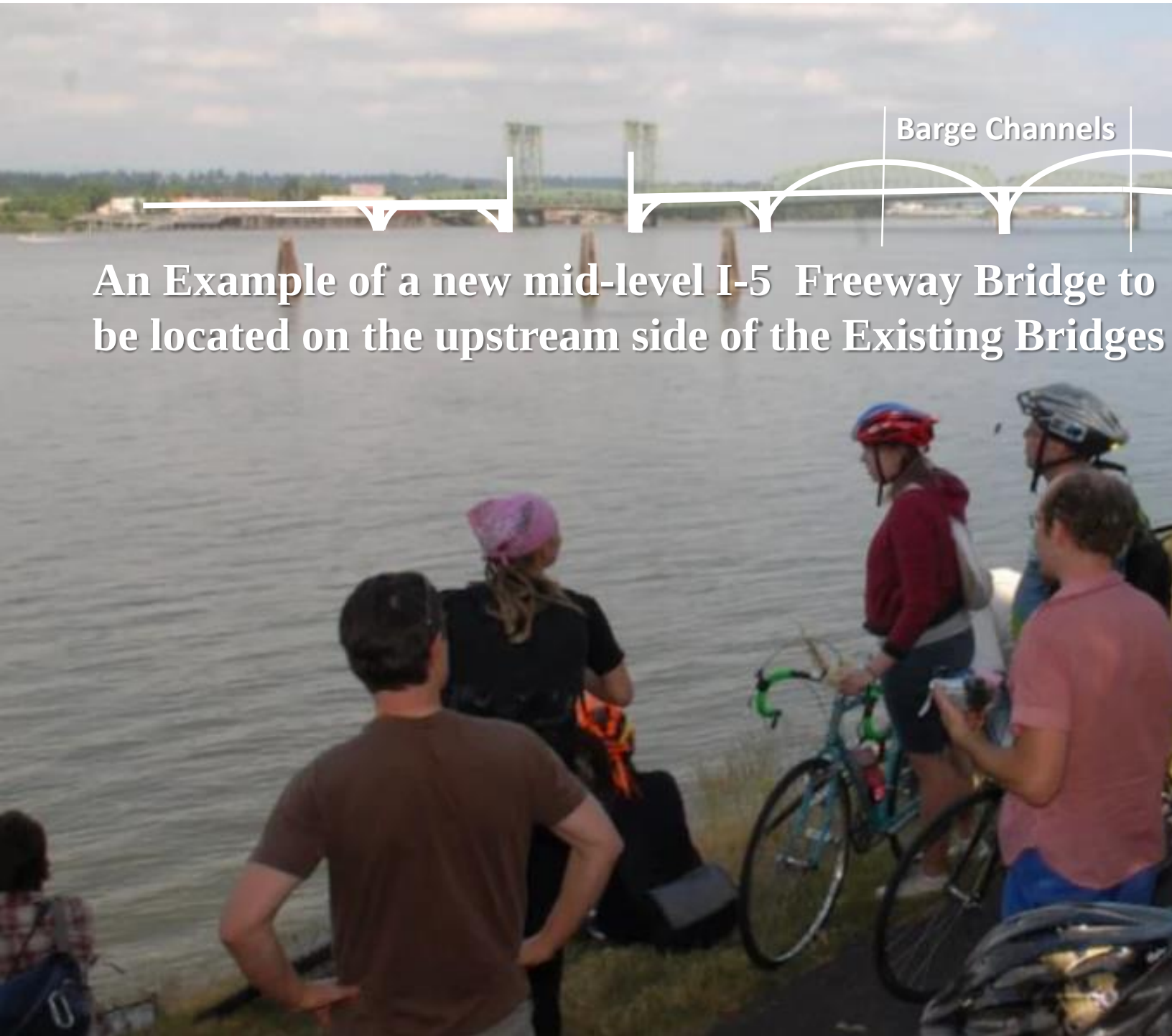

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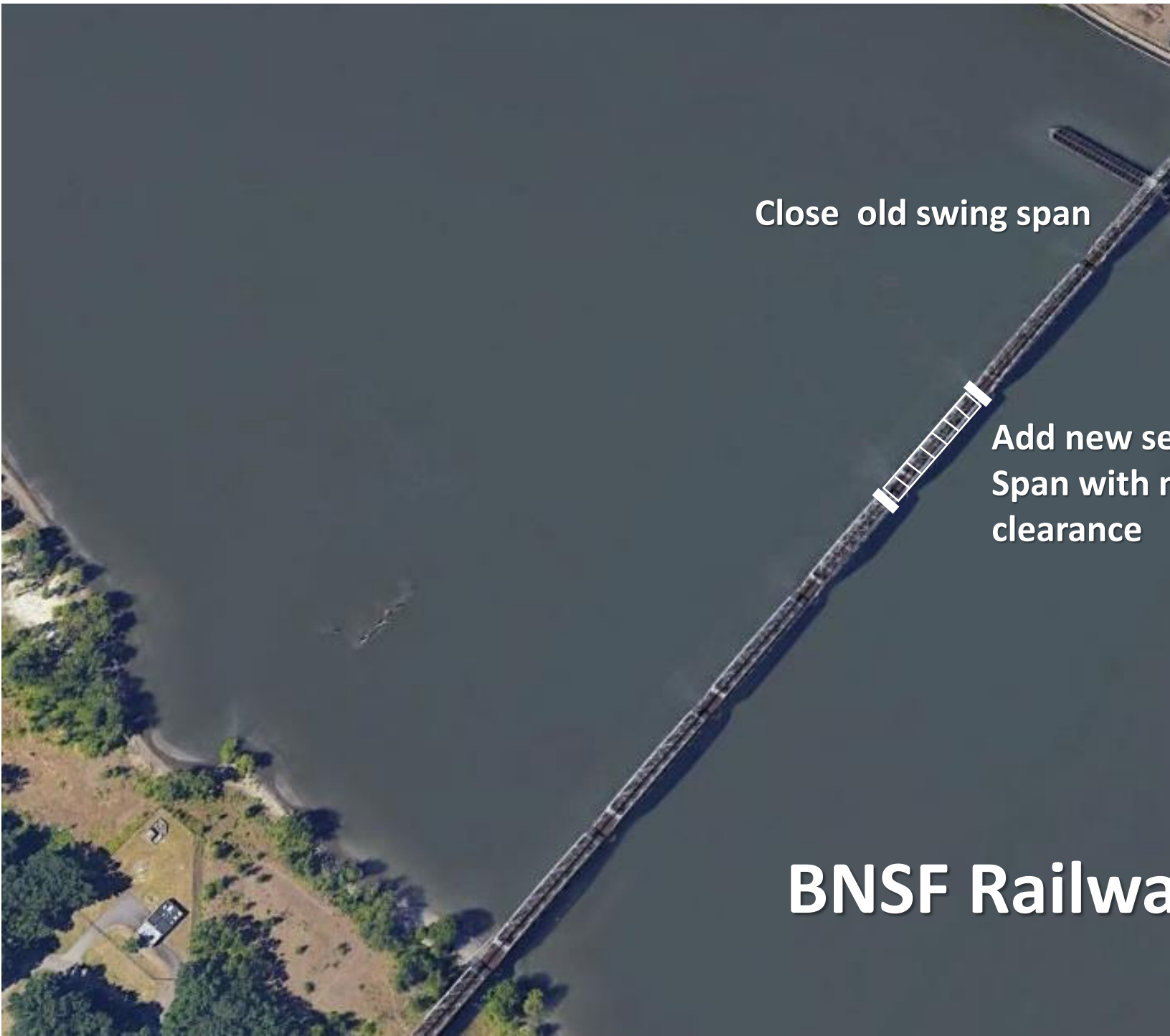
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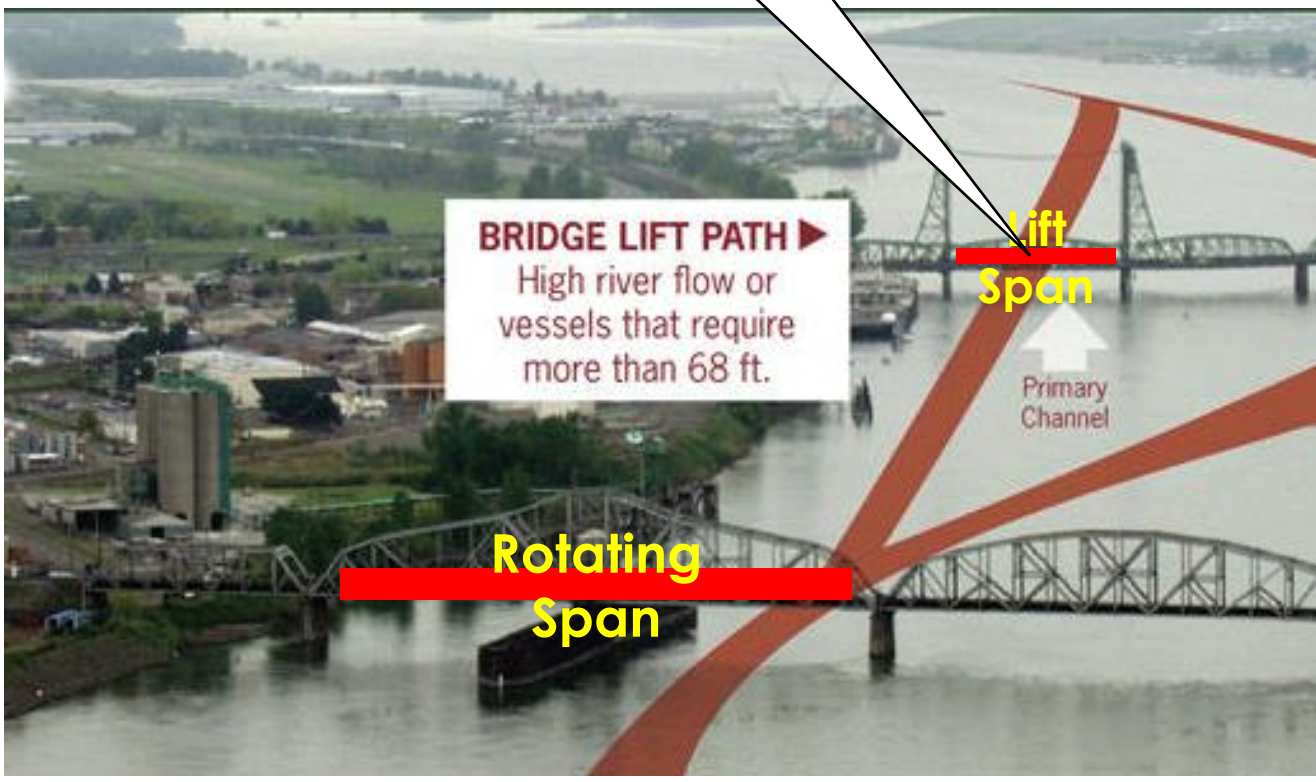

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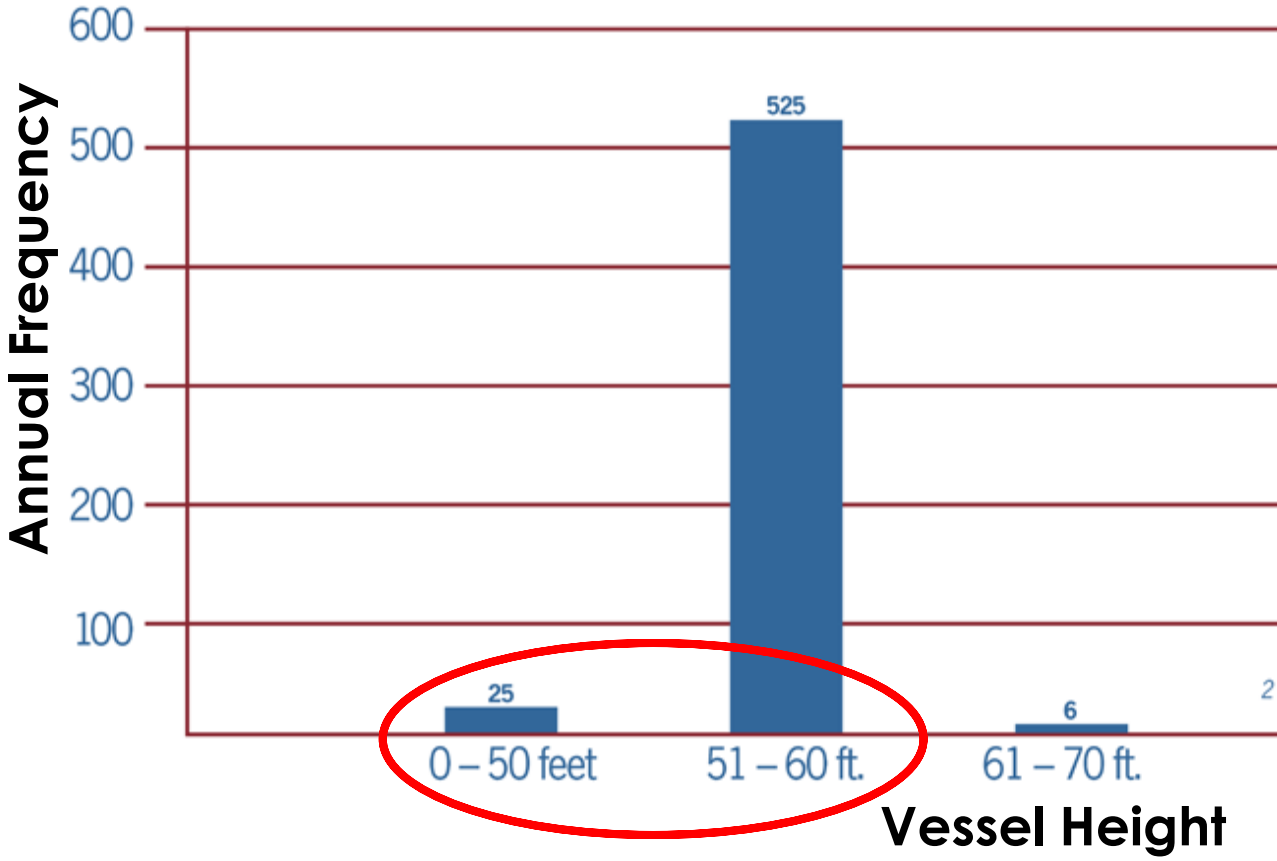

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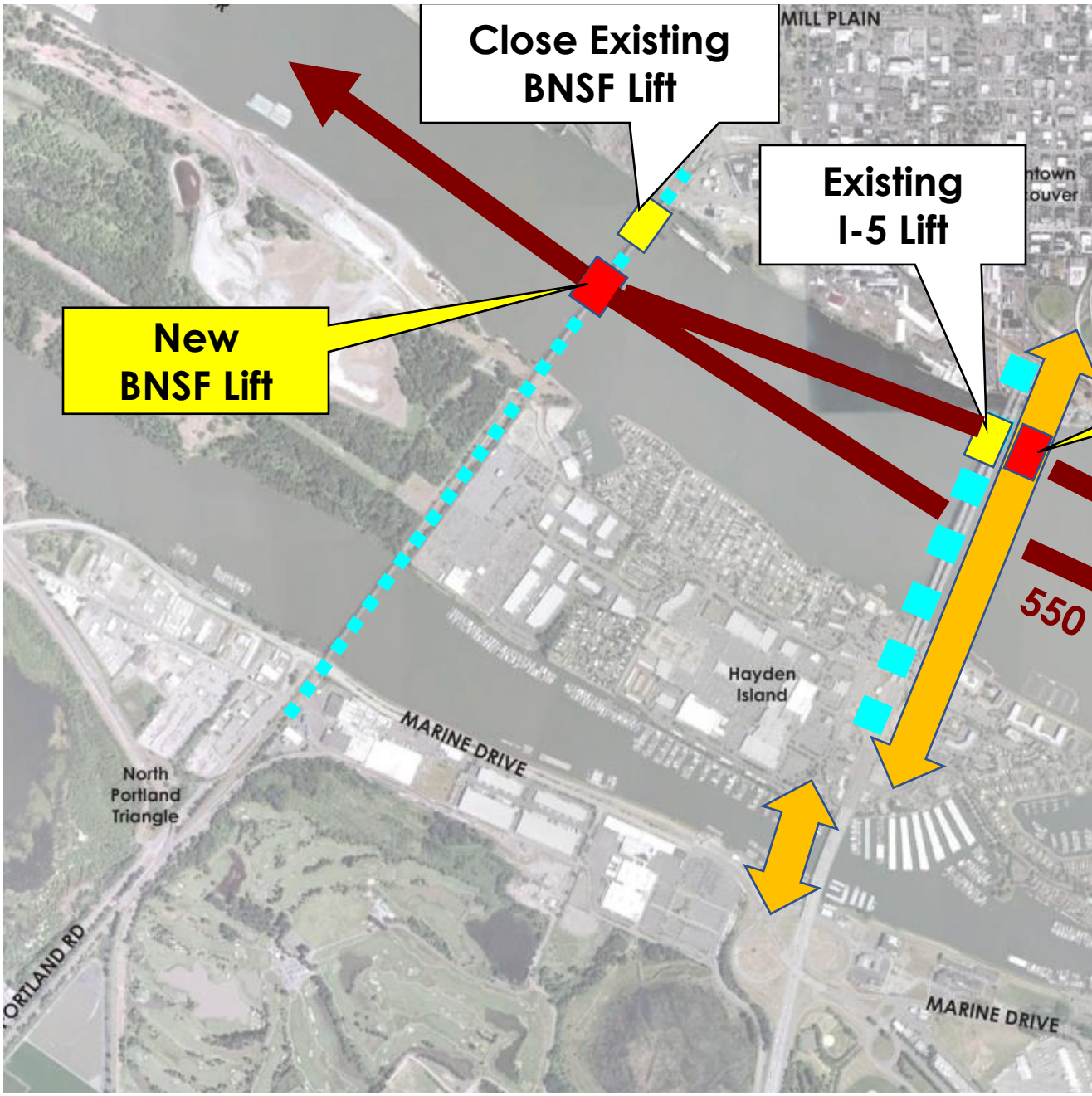

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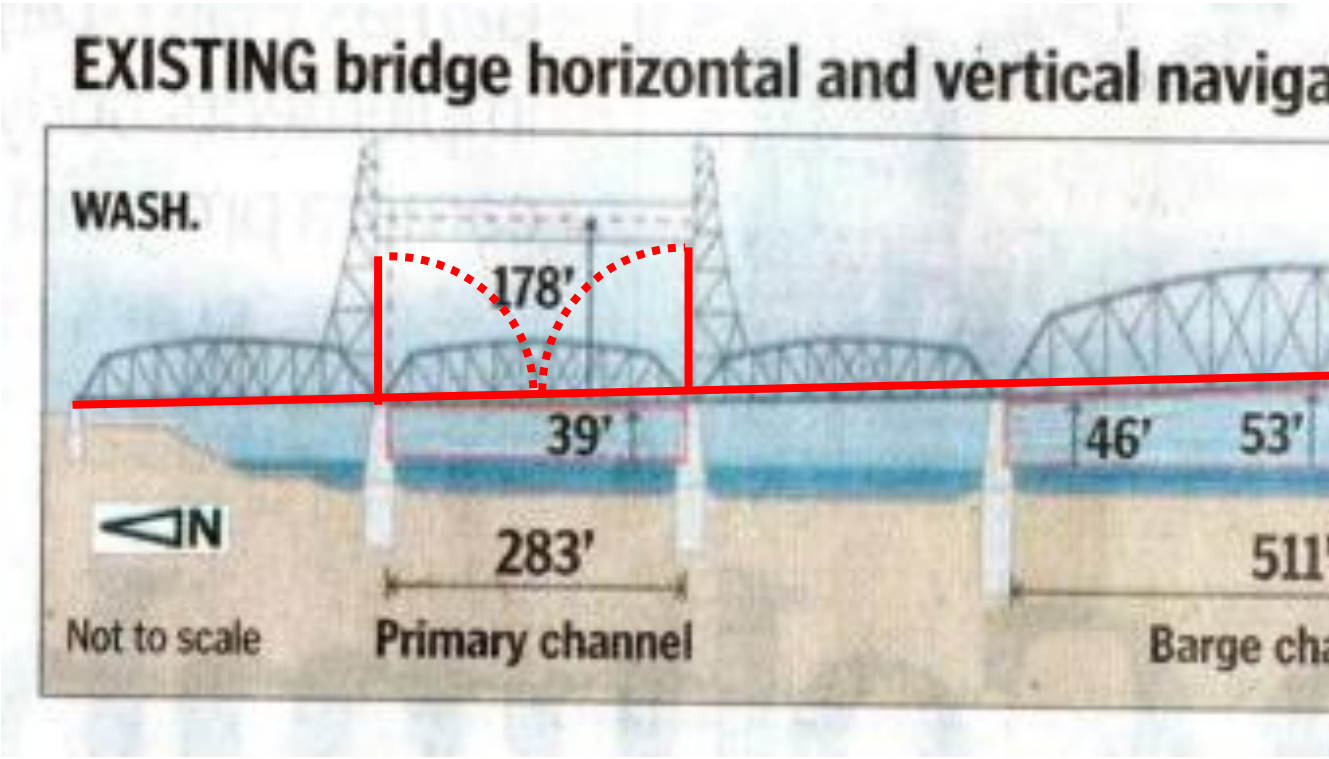

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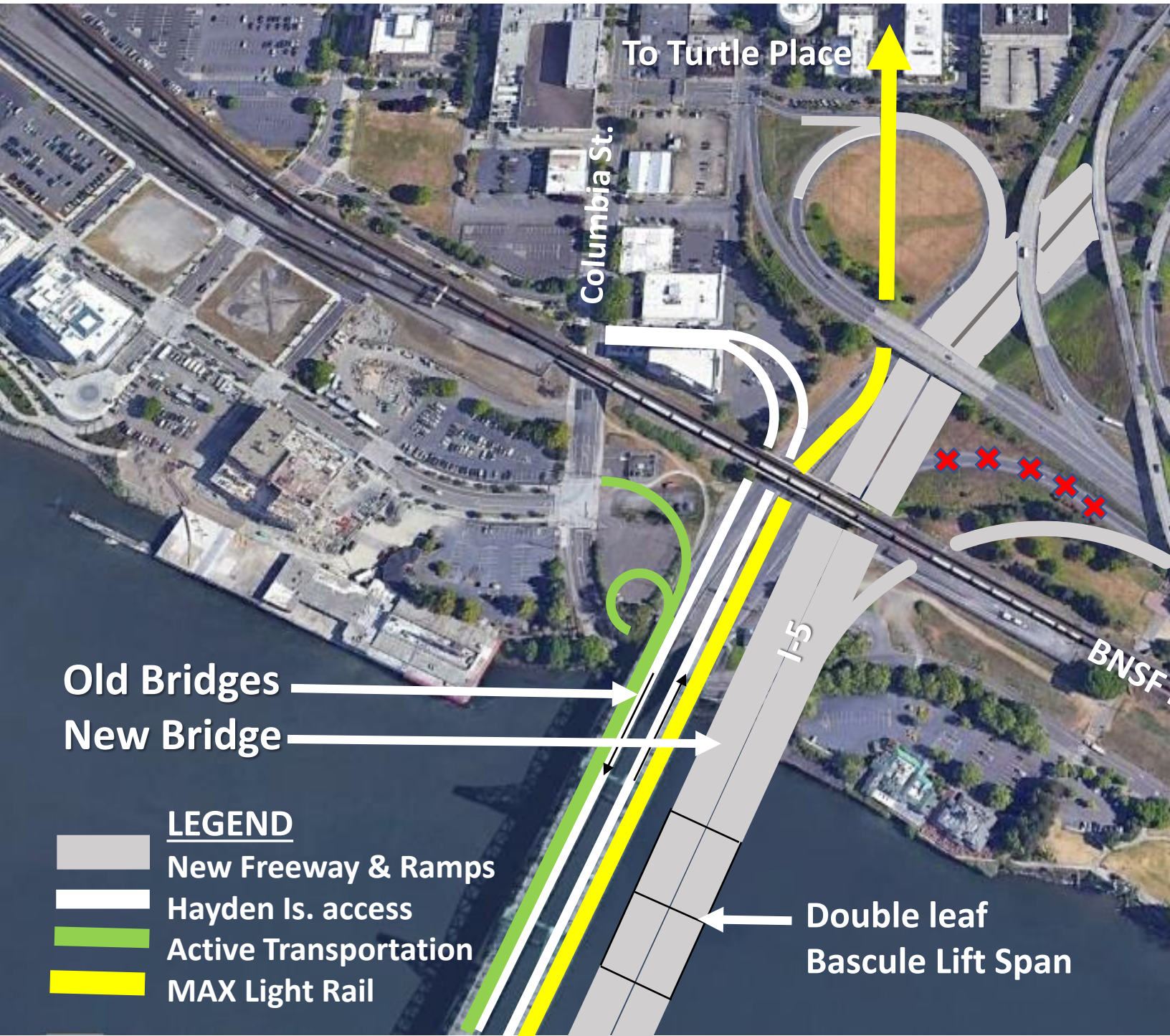
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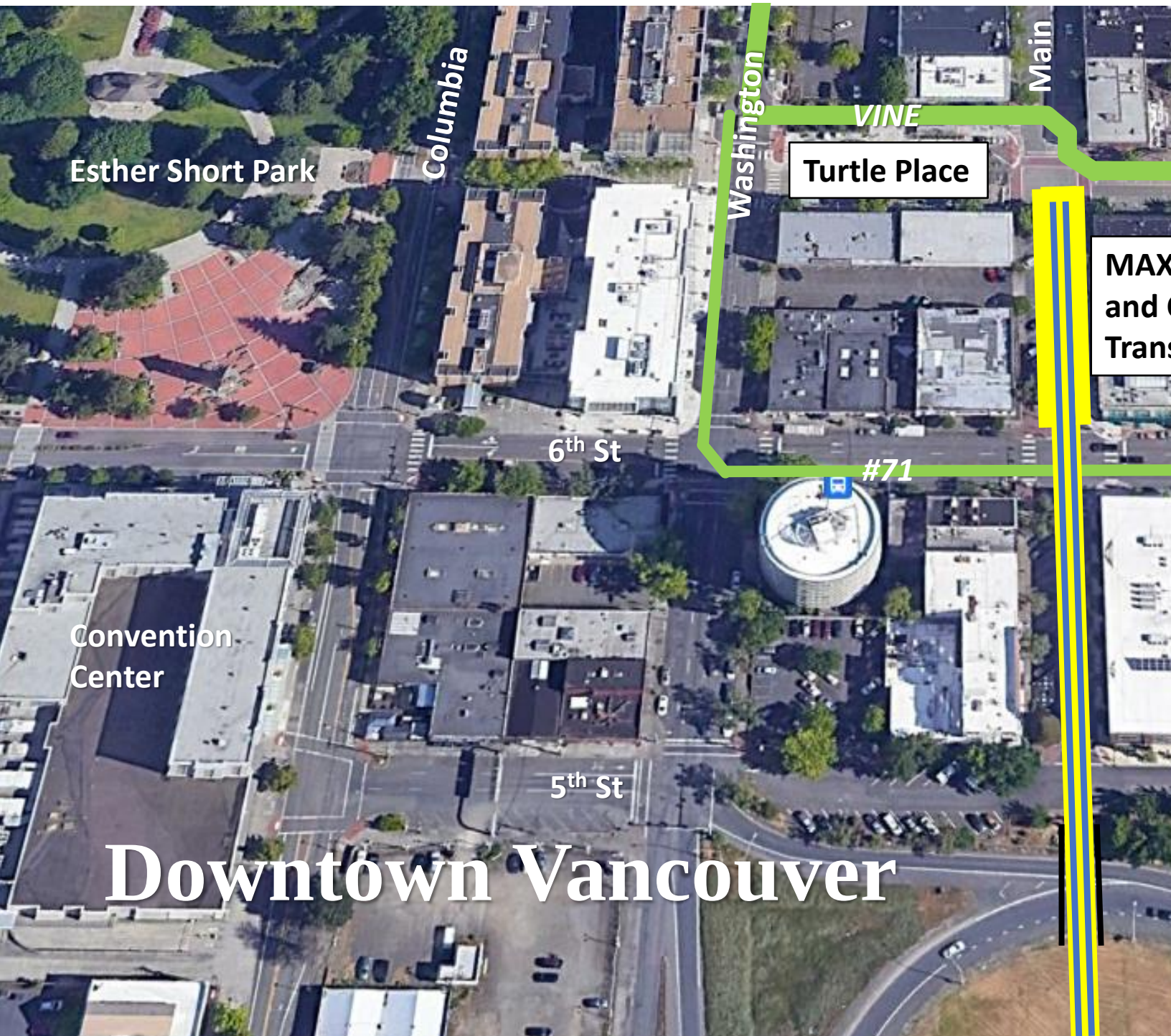
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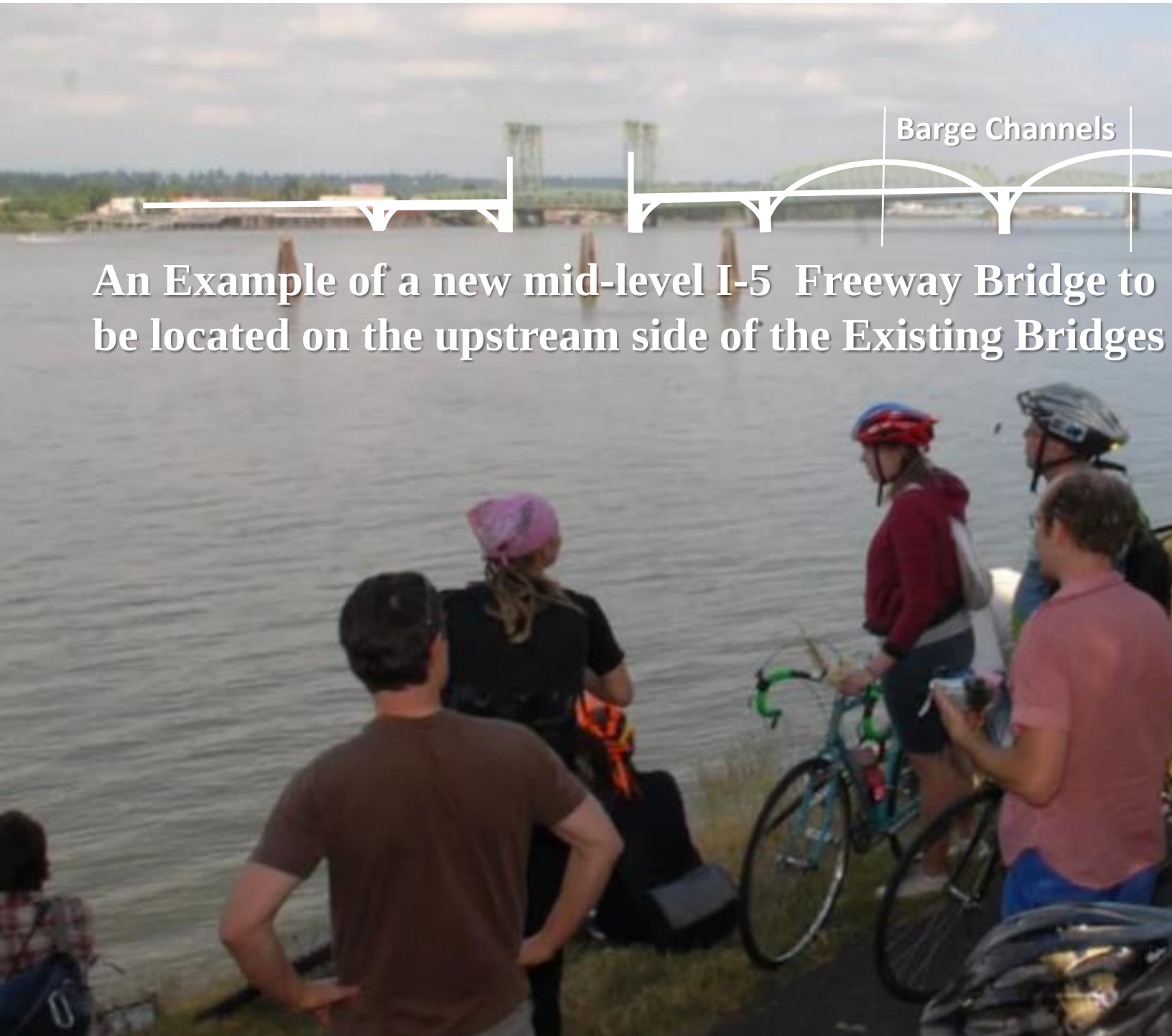

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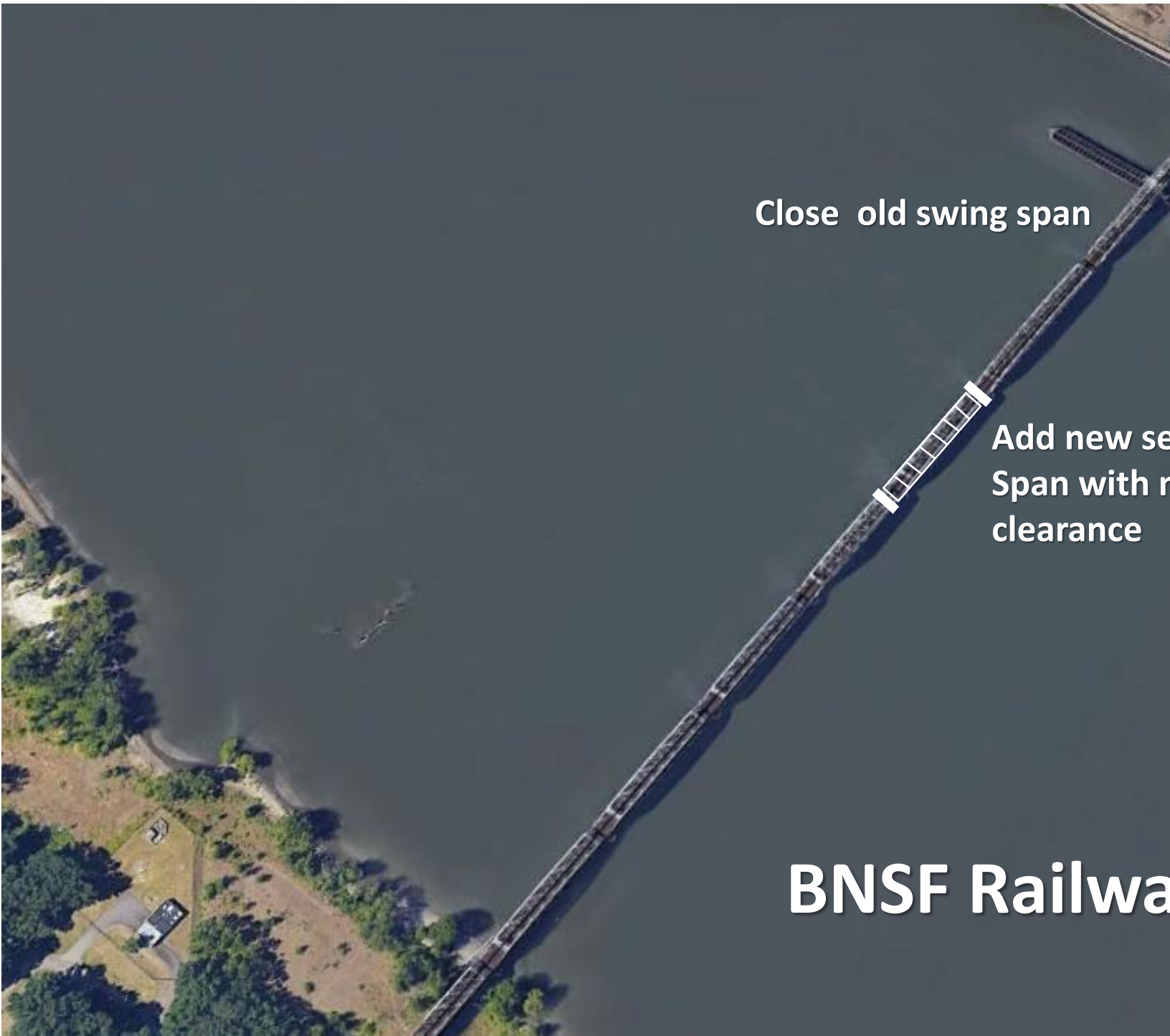
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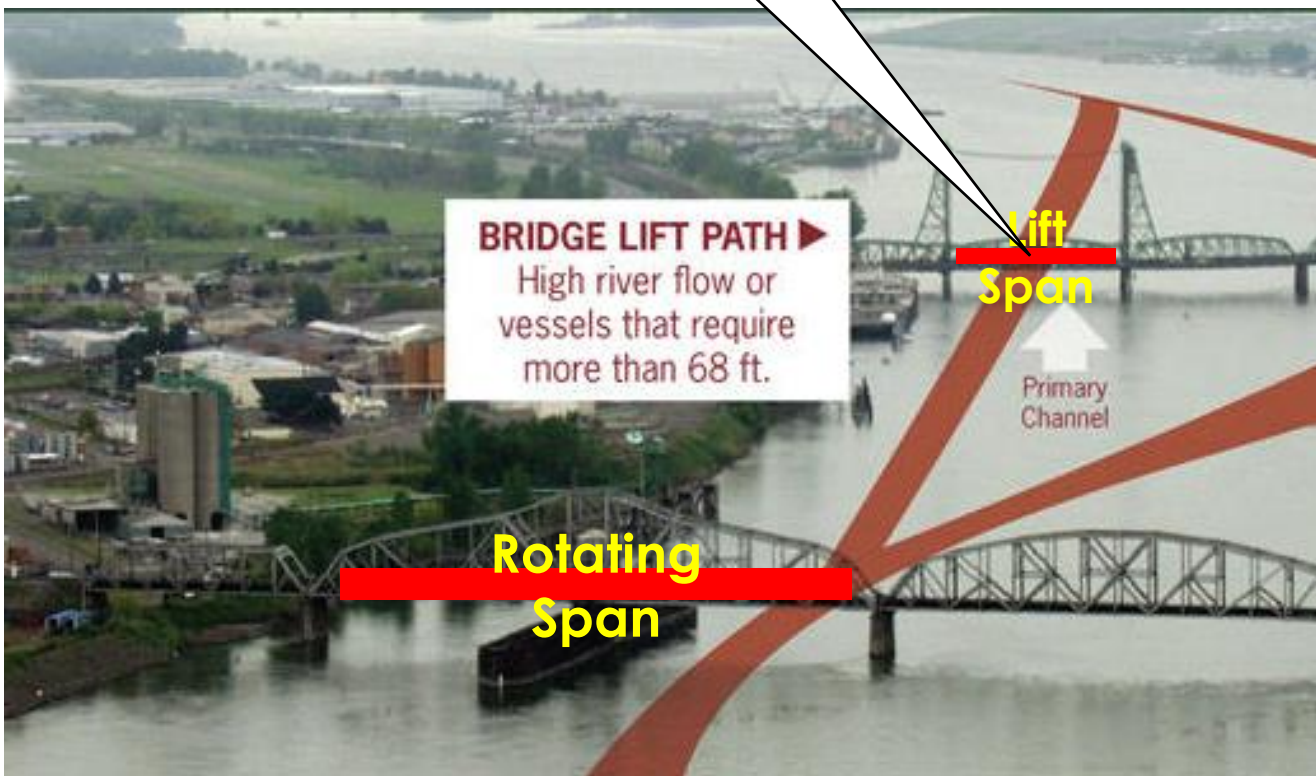

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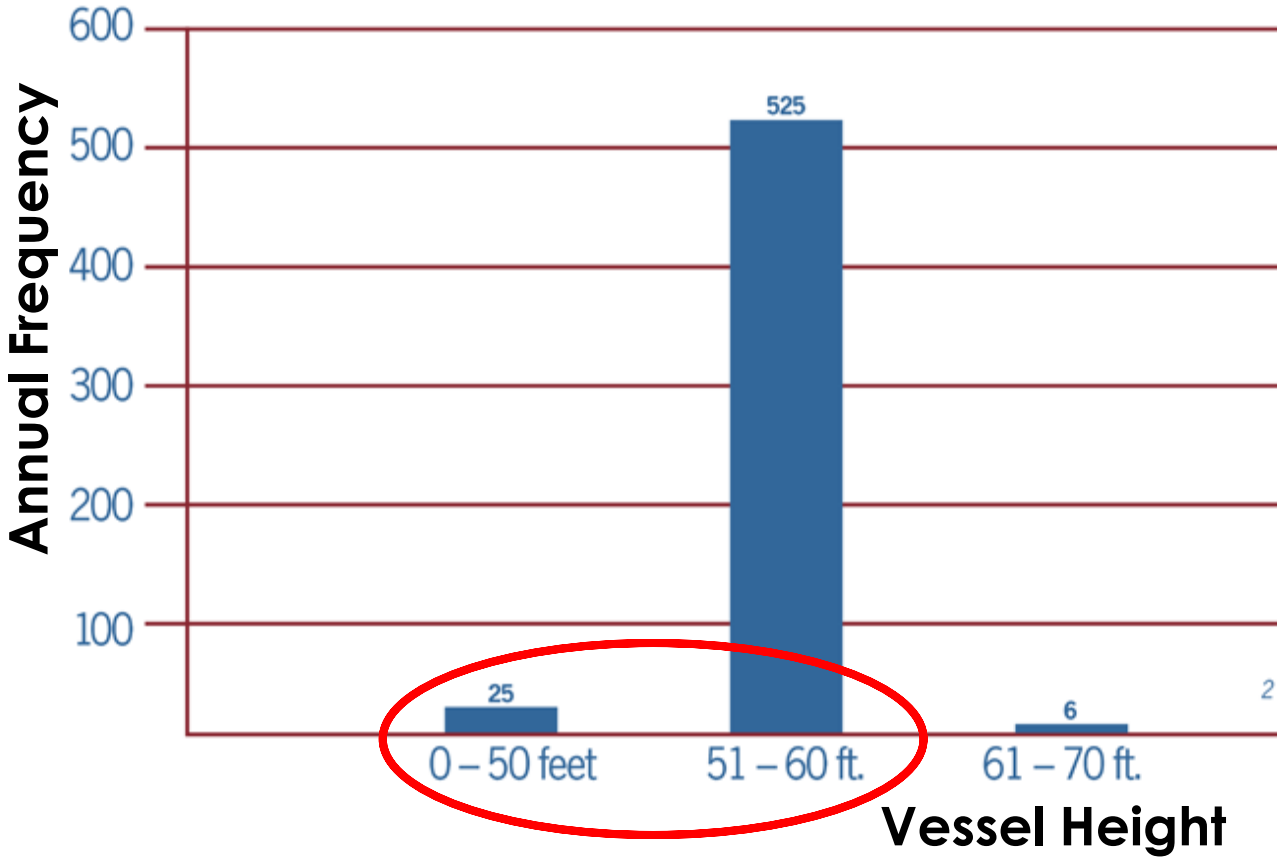

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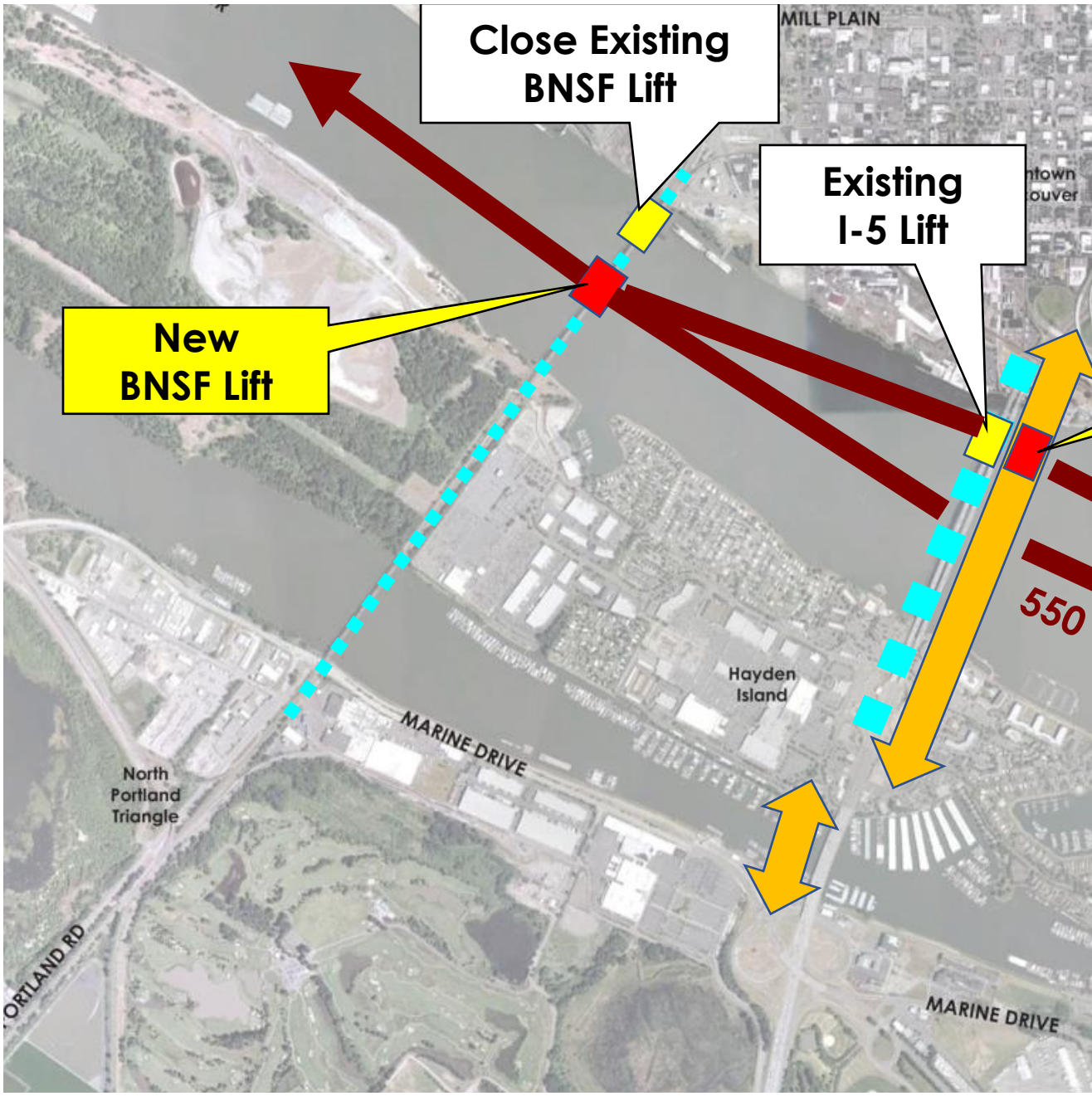

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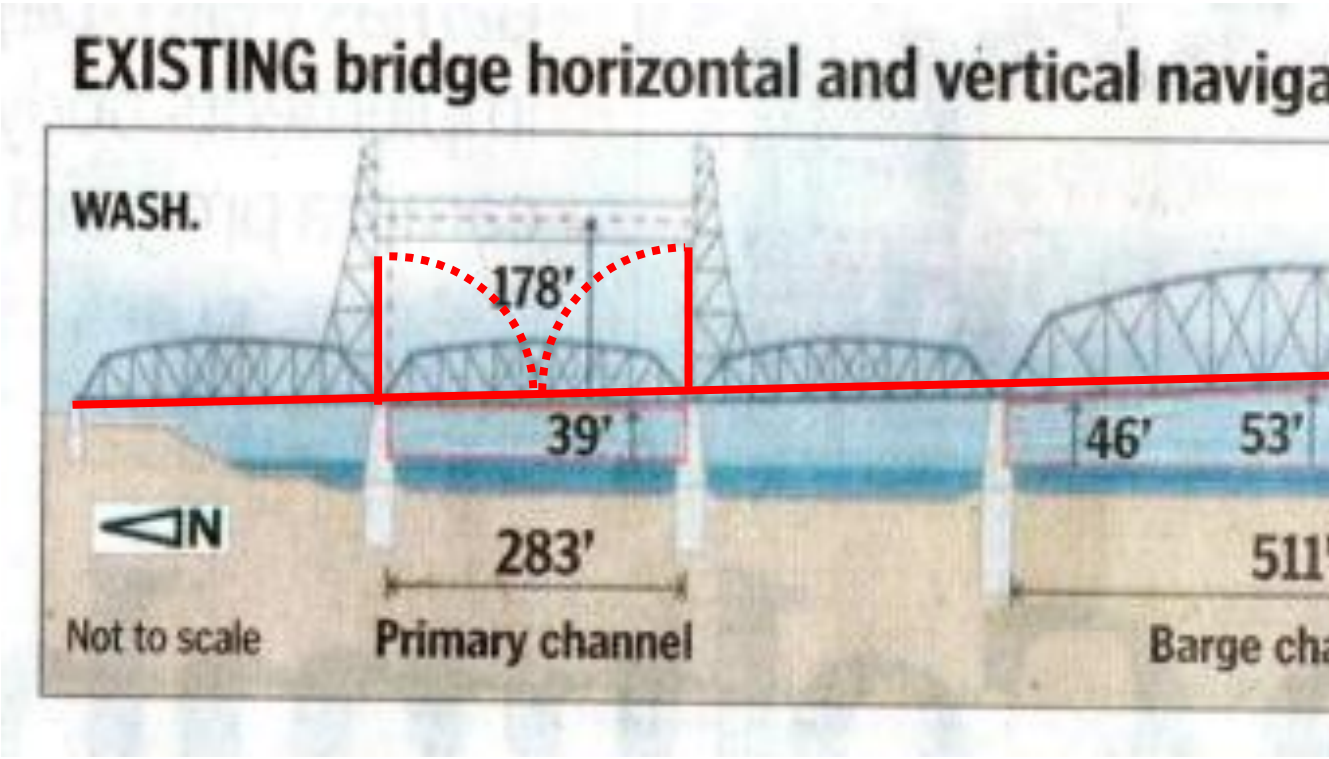

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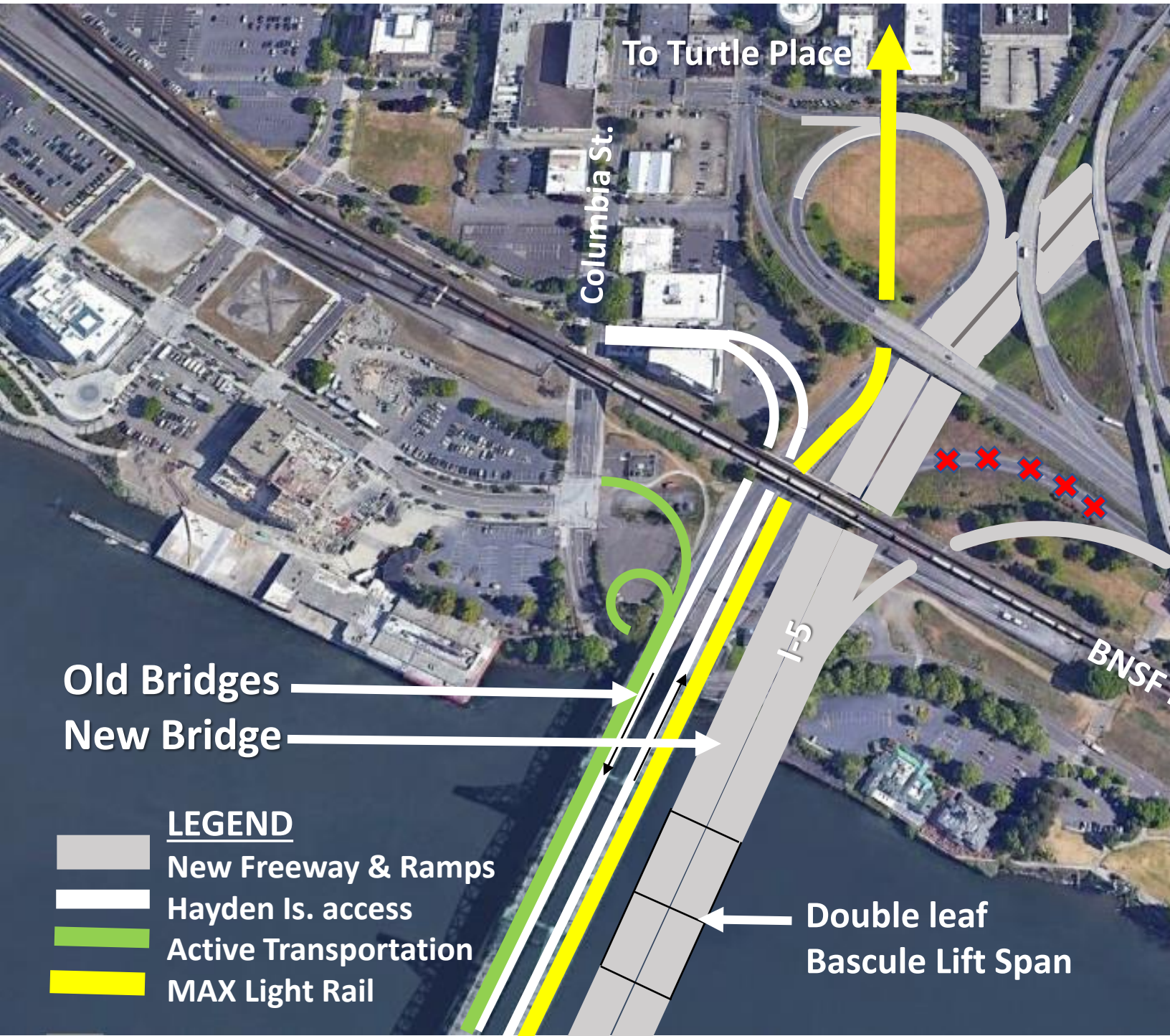
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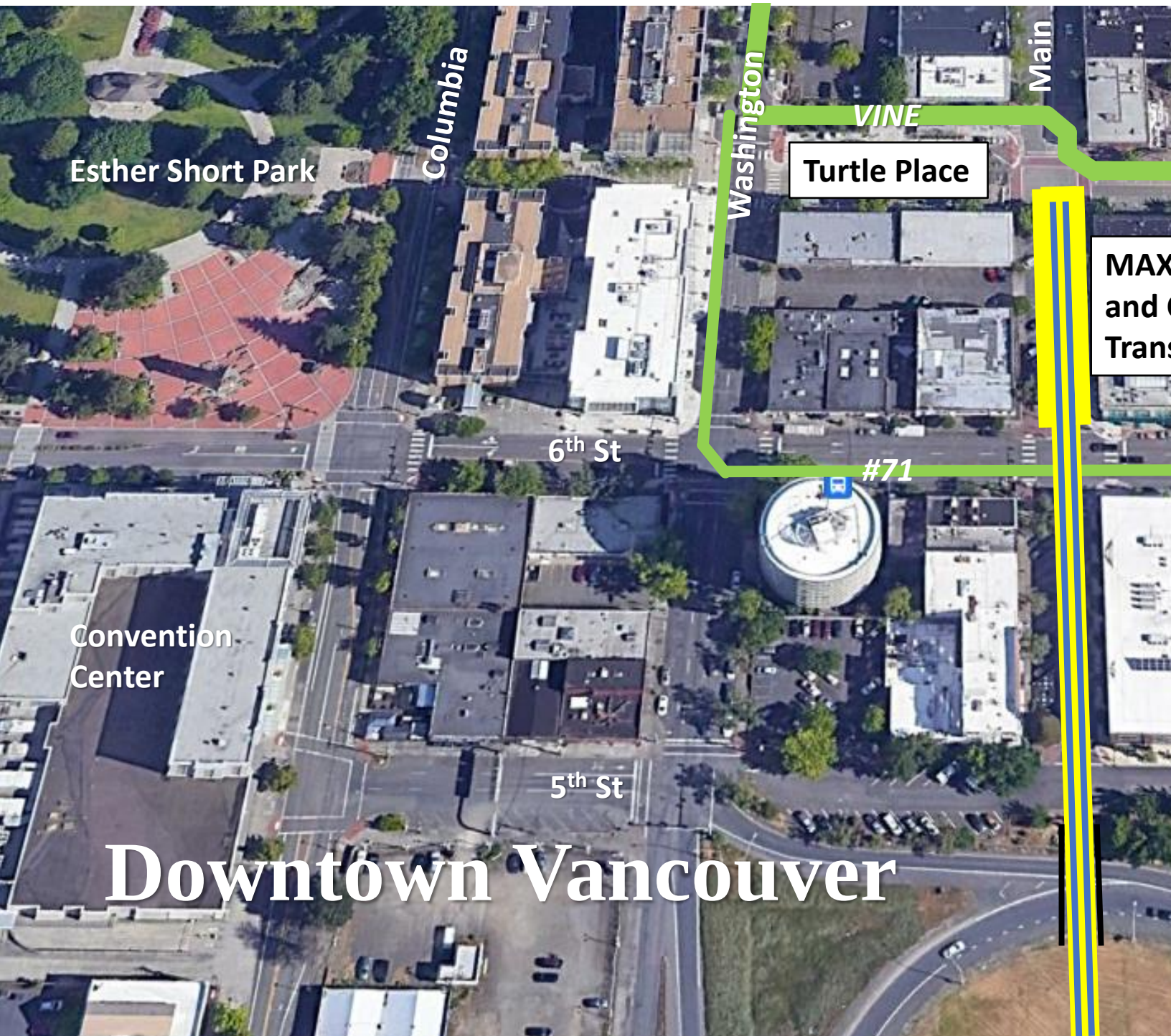
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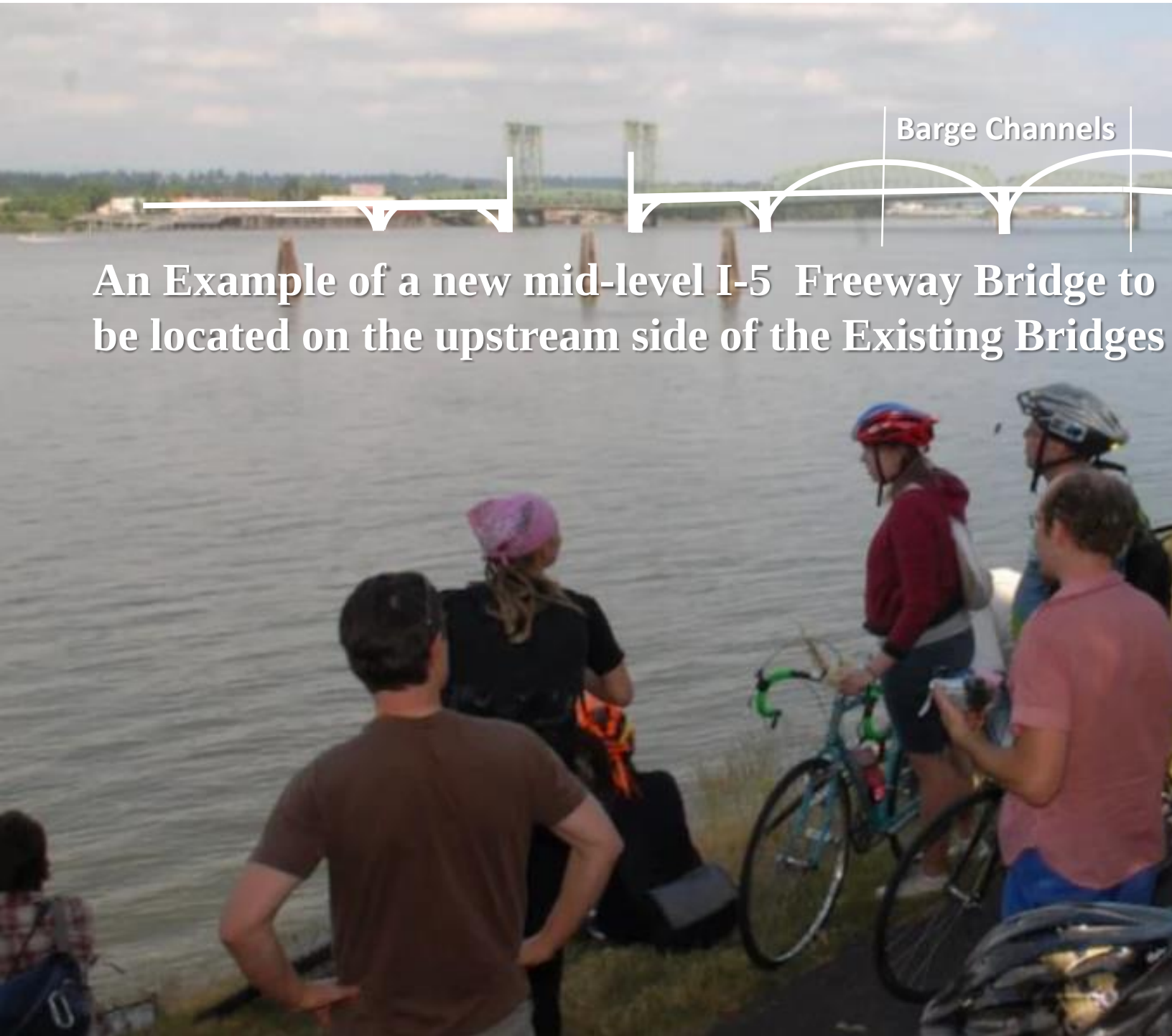

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IBR Draft SEIS - RECORD #2654 DETAIL

First Name :	David
Last Name :	Stein
Attachments :	DSEIS-2654_Stein_Original.pdf (135 kb) IBR_DSEIS_Public_Comment__David_Stein.pdf (137 kb)

IBR Draft SEIS - RECORD #2654 DETAIL

Submission Date :	11/18/2024
First Name :	David
Last Name :	Stein
Business/Organization/Agency :	
Attachments :	IBR DSEIS Public Comment - David Stein.pdf (137 kb)

Submission Input :

Hi IBR Team,

Please include the attached document in response to the Draft Supplemental Environmental Impact Statement for the Interstate Bridge Replacement which is currently open for public comment.

Thank you,
David Stein

November 17, 2024

As a member, and one of the main authors, of the Portland Bicycle Advisory Committee's (BAC) letter regarding the Interstate Bridge Replacement (IBR) Program for inclusion as part of the City of Portland's comments for the Draft Supplemental Environmental Impact Statement (DSEIS) I am submitting substantially similar comments as they align with my personal feelings. *This letter reflects my comments as a private citizen and are not on behalf of any committee or organization though it will refer to my experience on the BAC as it is integral to my understanding of this project and the DSEIS.*

Ensuring our lifeline transportation routes are seismically sound to support emergency services and evacuations is of critical importance for ensuring the safety of all Oregonians in the event of a major earthquake. I have greatly appreciated both the IBR Program Team and City staff attending Portland BAC meetings to present on project milestones, discuss questions and concerns and invite comments, including most recently for publication of the DSEIS. This is an opportunity to create a landmark connection at the gateway to Oregon that will represent our shared values for centuries to come. However it is necessary to note that the project area and goals appear to be much broader than this core need.

As detailed within this letter there are several recommendations to address at least some of the many deficiencies identified within the DSEIS.

1. Shift the location of active transportation facilities, particularly on the bridge itself, to be in alignment with the MAX extension. This is to provide additional separation from the many negative externalities of autos and gain the many benefits of having direct station access for people riding bicycles and walking without having to engage in, at times, significant out of direction travel. Ideally this would provide access starting from the Expo Center continuing to the northern terminus.
2. Add resting and/or observation areas on the shared use path (SUP) to both make the facility easier to use and provide spaces for people to enjoy the unparalleled views that will be available.
3. Utilize markings within the SUP to separate downhill bicycle users from pedestrians and uphill bicycle users. The speed differential could be significant and having a wide, unmarked space provides plenty of opportunity for conflict.
4. Develop a mechanism that connects to the street grid with less out of direction travel from the bridge on the Washington side of the river. The current helix ramp is excessively long and will be a significant barrier to access.
5. Include world class connections to make use of the active transportation facilities being built with this project. Their intentional omission by the arbitrary project area is disappointing and likely hinders the ability for this project to be successful from an active transportation utilization perspective before the first shovel breaks ground.
6. Perform an actual analysis of the changes in crash types with the LPAs presented so all stakeholders have a better understanding, based on similar changes built conditions, of how crash numbers AND severity will be addressed. Adding the word "safety" to shoulders is not a valid solution.

7. Utilize a more responsible definition of congestion in traffic analysis that respects current speed limits and safety objectives. A 5 mph slowdown where a 50 mph speed limit exists on a bridge is not sufficient justification for the type of infrastructure expansion being proposed.

I am disappointed that the conceptual project design in the DSEIS does not reflect the City's Transportation System Plan goals to improve the livability of Portland by: supporting Vision Zero, limiting traffic congestion, reducing carbon emissions and promoting healthy lifestyles, spending less on vehicles and fuel and creating great places. This extends to Metro's climate goals along with those of the state of Oregon and presumably the state of Washington as well. Though for the latter's case it is hard to determine how serious any goal around reducing carbon emissions can be when WSDOT has engaged in serial freeway expansion after it has continually failed to alleviate congestion and ever more vehicles are on the road as a result. Nothing has been learned which is how we are now looking at a project that could have been proposed half a century ago as a solution to all that ails us yet the knowledge exists that the only thing it will succeed in is keeping the many current and future contractors employed and profitable.

Mobility

WSDOT has expanded I-5 and I-405 in the Seattle metropolitan area to a grand degree, yet the region is plagued by congestion by every measure. Our freeway widenings have had similar fates. We continue to spend billions of dollars on highway investments that evidence has shown nationwide to induce demand. Even if this project did solve congestion in the project area, which is staggeringly unlikely, the back-up will only move south where the highway is still constrained. What this will lead to is more billion dollar projects to add auxiliary lanes to the split of I-405 and then the full I-5 Rose Quarter project that is still $1.5 billion short of being funded.

Further, the definition of congestion at anything 45 mph or lower is dangerous and reckless. The mobility policy adopted in Metro's Regional Transportation Plan uses a measure of speeds of 35 mph for more than four hours. Using a higher measure results in an outcome that is financially irresponsible and sets an untenable precedent. With speed limits that vary between 50 to 60 mph throughout the project area, this definition means a slowdown of 5 mph is worthy of billions of dollars in intervention. Yet at the same time, there are many locations in the project area and Portland where the most vulnerable road users, often from the most marginalized communities, are lacking protected or even any facilities.

There are numerous reasonable and responsible reasons for traffic to slow down including weather, construction/road work, vehicle(s) on the shoulder, and vehicles merging on and off the highway. Small changes in speed for these reasons should not be a reason to claim there is congestion and by doing so it encourages a much more robust and expansive Locally Preferred Alternative that looks more like a construction company fever dream in Texas or Florida rather than a responsible and restrained project that acknowledges that single occupant vehicles should not be further encouraged for reasons including safety, greenhouse gas emissions, microparticle emissions from brakes and tires, lack of affordability for a society dependent upon auto ownership, and insufficient resources for maintaining current transportation facilities.

Safety

This project fails to address the current safety issues within the IBR project area, even though this project provides a significant opportunity to do so. The rigid definition of congestion creates an incentive to design unsafe driving conditions by encouraging "driv[ing] a vehicle on a highway at a speed greater than is reasonable and prudent under the conditions" in violation of RCW 46.61.400 (Washington Basic Rule) and ORS 811.100.

The increased speeds that, while unlikely, are projected by building this project as a result of reduced congestion would result in a higher number and proportion of deadly crashes. By claiming that congestion can happen with as little as a 5 mph drop in speed, this project is supporting the kind of behavior that led to the deaths of over 586 people in Oregon last year (328 of which were on ODOT facilities). Based on ODOT's Crash Data Systems, the second and third leading causes of crashes were roadway departure and speed-related respectively, neither of which will be solved with a freeway that is more than double the current size and engineered for people to travel at unsafe speeds in service to relieving congestion.

IBR staff were not able to provide any breakdown of how the types of crashes would change as a result of any LPA on the table when I asked directly and at best showed a lack of meaningful preparation to discuss the topic. Crashes of all types are bundled together when claiming that this project will result in safer conditions even though serious and fatal crashes are the focus of the City's Vision Zero program and Metro's regional safety goals. IBR staff did not provide any proof or cite any data from other similar roadways to confirm the assertion that serious and fatal crashes will be drastically reduced if the total number of crashes are reduced. The projected increased speeds makes it unlikely this is the case. If the forecasted "congestion relief" fails to materialize then the crashes being prevented are of the low speed variety that more often result in vehicle damage instead of bodily harm and do not merit the expenditure of billions of additional dollars as part of this super-sized project.

Climate

Measuring emissions without any climate related goals communicates the lack of seriousness that the IBR DSEIS places on one of the core project goals. Pollution driven by increased vehicle miles traveled (VMT) expected as a result of the project goes well beyond the stated purpose and need for a replacement bridge that is centering travel by automobiles while merely tolerating every other mode of travel in its design.

This project claims to address climate change by reducing congestion. However, that assertion ignores advances in ICE technology in the last 50 years that have made vehicles more efficient in traffic and at lower speeds. Further, we know that maximizing transportation choice is the key to reducing congestion, while widening always has the opposite effect eventually. In fact, the slight increase in overall river crossings with the DSEIS project as compared to the no-build is testament to this fact.

A higher proportion of vehicles are assumed to be electric rather than internal combustion (ICE), but the analysis fails to account for the increased vehicle tonnage due to batteries, along with the environmental damage and carbon emissions associated with the mining and manufacture of those batteries, and larger dimensions as vehicle sizes and weights continue to grow. A more complete

analysis would reveal the marginal benefits of this shift lessen or even negate these anticipated greenhouse gas emissions savings.

Bicycle and Pedestrian Infrastructure

I care about, and have dedicated hundreds of volunteer hours toward, improving pedestrian and bicycle infrastructure and networks throughout the city and metropolitan area. It should indicate something that it took until the 4th page of this document to get to what may be the most important section in my mind. However this project as proposed is flawed in ways that are intentional and well considered.

More separated space for people riding bicycles and walking as part of a new bridge design will be a huge improvement over the facilities that exist today. However, many critical elements of the active transportation facility design that contribute to rider experience are lacking - with people walking and bicycling as an afterthought (rather than a focus). This is likely why even with both a new mixed-use facility and light rail extension as part of the bridge we only see a slight decrease in the number of people driving with the project (though also induced demand as highlighted below).

I remain concerned about the elevation changes in the LPAs. While all of the options are technically ADA compliant, having extended elevation gains still represents a barrier that has not been adequately addressed. There was no identifiable discussion of flat rest or observation areas that could be utilized to break up the elevation gains or otherwise gain respite out of the flow of travel for people walking or biking in the SUP. The elevation gains and losses are also concerning because the downhill portions on bicycles represent opportunities for large speed differentials and with 25' to work with there is a need to provide cues for all users to prevent conflicts. I would recommend the use of signage, paint, and textured materials to safely and consistently guide all users to the proper areas of the SUP they should be utilizing based on how they are traveling. Allowances for shy distance on bicycles will be important to incorporate as well in future design and implementation.

The helix ramp is of particular concern. First for the increased distance it adds to the trip. Just the bridge and ramp length alone make this a long trip for cyclists, not to mention that most people who use it live or are accessing destinations that are also some distance away. A solution that provides a straight shot for driving and a meandering path for people walking and bicycling around it is not how we encourage people to select the most vulnerable modes toward our climate and congestion goals. Second the safety challenges it poses due to descending bicyclists likely traveling much faster than people biking uphill or walking. As any mountain biker knows, there are limits to the brakes on our vehicles related to hills (similar to freight which we design safeguards for). A heavy hand can send you over the handlebars or, in the wrong weather conditions, skidding. For increased safety of all SUP users, I strongly recommend "[c]o-locating the shared-use path with the proposed Waterfront Station to provide additional elevator access down to Columbia Street/Columbia Way" as is outlined in 4.8.2.1 of the Transportation Technical Report – this is both more practical in better activating all of these modes in a complementary fashion and addresses some of the loudest concerns about this project. I also further encourage the IBR Team to identify more productive ways to connect downtown Vancouver facilities with the Interstate Bridge while avoiding seemingly endless loops.

In prior visits to the BAC, members, including me, have voiced concerns about proposed active transportation facilities having similarities to what exists on the Glenn Jackson Bridge (I-205 crossing of the Columbia River). That facility is an SUP that is in between the north and south bound lanes making it extremely uncomfortable, deafeningly loud, and difficult to breathe. The LPAs for the IBR provide a range of options, however they are all similar in that they will be located relatively close (14-24') to vehicles traveling 50+ mph which will result in significant noise and debris from cars and crashes and poor air quality from particulate matter. This again is not how we will encourage people to leave their comfortable cars to travel by bicycle or how we achieve environmental justice for marginalized communities that do not have the choice. We are dismayed that the location of the SUP doesn't take advantage of the planned light rail extension. Co-location, with the SUP to the west of the MAX line, rather than the current east side alignment, would provide a greater degree of separation from the noise, debris, and pollution from cars. Integration of first and last mile mode access with transit would link these systems, making them complementary rather than exclusive to each mode. It would allow for better connectivity and increase options for people using transit to access Hayden Island and Downtown Vancouver.

Going beyond the bridge itself, the IBR is an expansive project covering roughly five miles of I-5 and numerous on and off ramps and overpasses. The project area seems to have been selected to maximize the amount of construction that could be performed to "solve congestion" for the highway. It leaves bicycle connections unresolved in particular and in the hands of local jurisdictions that are not able to bring commensurate financial resources to the table. This is a mistake, especially in light of the billions that will be spent outside of the roadways directly impacted by a new bridge to "address congestion". The connection to MLK Jr Blvd is a particular concern worth spotlighting. While the IBR project area will have bicycle facilities that are generally good, they will then connect with infrastructure that ranges from decent to missing. We cannot build bike lanes to nowhere and expect people to use them (and decry when they don't). There aren't many opportunities to bring major federal investments into Portland and there are even less funding opportunities for active transportation projects. This project has a responsibility to complete the network gaps that make it possible for people to walk and bike safely and comfortably between North Portland and downtown Vancouver.

In Washington, the on and off ramps the project will build are so extensive that it balloons the footprint of I-5 to roughly 14 lanes (based on illustrative videos that the IBR Team has posted to YouTube). That comes with a price tag large enough to build out a significant portion of Portland's entire 2030 Bicycle Master Plan which would result in far more congestion relief, safety improvements, and environmental benefits. In this case, why are we not including broader network investments for people walking and bicycling on the Oregon side? Why is the City of Portland responsible for finishing the network connections? While many of the facilities could be considered world class due to the low bar for that classification and the care given to bicycling and walking within the project area we are aware that only in conjunction with world class connections will this infrastructure be activated. By omitting many of the connections by excluding them from the project area and leaving local jurisdictions holding the bag the IBR project will fail to realize the active transportation usage necessary to make bicycling as attractive as driving.

Funding and Priorities

ODOT's funding outlook is bleak. Without tolling revenues, there is not money to pay for the suite of megaprojects that make up the majority of ODOT's investment portfolio. IBR will focus billions on a single span that will inevitably be used to justify further megaprojects in the span of I-5 between IBR and I-5 Rose Quarter. Yet, this project provides the framework to financially cripple ODOT's ability to:

- address the large backlog of failing bridges throughout the state;
- fill vast remaining active transportation implementation gaps;
- address the many deadly safety issues that exist on state roadways, particularly urban arterials; and
- maintain the roadways it owns (for example, in 2023 ODOT did not have enough money to maintain snow plowing in the passes through the Cascades).

Ironically this project also promotes continued widespread tax evasion by Washington residents who have long used the easy access to the Jantzen Beach shopping center to avoid the ~10% sales taxes of Vancouver and Clark County. The limited direct access from I-5 only to/from Washington adds unnecessary complexity and expense to this project. As someone who grew up in Vancouver this type of activity is not a secret and designing a significant piece of this project to preserve low paying jobs at big box retailers is to the detriment of everyone involved.

I appreciate that this project will provide much needed safety and comfort improvements compared to the current conditions on the I-5 bridge. Having ridden across the bridge on bike, it's a harrowing experience that is immediately regretted so the prospect of something better is a relief. At the same time we must remember that better is not the same as good (or great) and if this project is to be looked back on in future decades as successful the current design won't cut it. I look forward to continued engagement as the project moves into design during my remaining time on the BAC and will continue to track this project carefully after my time there is finished.

However, this major regional project can and should do much more. I hope that the IBR Team is receptive to this advice so that we will see our City and regional visions reflected in the final DSEIS concept.

Thank you for your time and consideration,

David Stein

November 17, 2024

As a member, and one of the main authors, of the Portland Bicycle Advisory Committee's (BAC) letter regarding the Interstate Bridge Replacement (IBR) Program for inclusion as part of the City of Portland's comments for the Draft Supplemental Environmental Impact Statement (DSEIS) I am submitting substantially similar comments as they align with my personal feelings. *This letter reflects my comments as a private citizen and are not on behalf of any committee or organization though it will refer to my experience on the BAC as it is integral to my understanding of this project and the DSEIS.*

Ensuring our lifeline transportation routes are seismically sound to support emergency services and evacuations is of critical importance for ensuring the safety of all Oregonians in the event of a major earthquake. I have greatly appreciated both the IBR Program Team and City staff attending Portland BAC meetings to present on project milestones, discuss questions and concerns and invite comments, including most recently for publication of the DSEIS. This is an opportunity to create a landmark connection at the gateway to Oregon that will represent our shared values for centuries to come. However it is necessary to note that the project area and goals appear to be much broader than this core need.

As detailed within this letter there are several recommendations to address at least some of the many deficiencies identified within the DSEIS.

1. Shift the location of active transportation facilities, particularly on the bridge itself, to be in alignment with the MAX extension. This is to provide additional separation from the many negative externalities of autos and gain the many benefits of having direct station access for people riding bicycles and walking without having to engage in, at times, significant out of direction travel. Ideally this would provide access starting from the Expo Center continuing to the northern terminus.
2. Add resting and/or observation areas on the shared use path (SUP) to both make the facility easier to use and provide spaces for people to enjoy the unparalleled views that will be available.
3. Utilize markings within the SUP to separate downhill bicycle users from pedestrians and uphill bicycle users. The speed differential could be significant and having a wide, unmarked space provides plenty of opportunity for conflict.
4. Develop a mechanism that connects to the street grid with less out of direction travel from the bridge on the Washington side of the river. The current helix ramp is excessively long and will be a significant barrier to access.
5. Include world class connections to make use of the active transportation facilities being built with this project. Their intentional omission by the arbitrary project area is disappointing and likely hinders the ability for this project to be successful from an active transportation utilization perspective before the first shovel breaks ground.
6. Perform an actual analysis of the changes in crash types with the LPAs presented so all stakeholders have a better understanding, based on similar changes built conditions, of how crash numbers AND severity will be addressed. Adding the word "safety" to shoulders is not a valid solution.

7. Utilize a more responsible definition of congestion in traffic analysis that respects current speed limits and safety objectives. A 5 mph slowdown where a 50 mph speed limit exists on a bridge is not sufficient justification for the type of infrastructure expansion being proposed.

I am disappointed that the conceptual project design in the DSEIS does not reflect the City's Transportation System Plan goals to improve the livability of Portland by: supporting Vision Zero, limiting traffic congestion, reducing carbon emissions and promoting healthy lifestyles, spending less on vehicles and fuel and creating great places. This extends to Metro's climate goals along with those of the state of Oregon and presumably the state of Washington as well. Though for the latter's case it is hard to determine how serious any goal around reducing carbon emissions can be when WSDOT has engaged in serial freeway expansion after it has continually failed to alleviate congestion and ever more vehicles are on the road as a result. Nothing has been learned which is how we are now looking at a project that could have been proposed half a century ago as a solution to all that ails us yet the knowledge exists that the only thing it will succeed in is keeping the many current and future contractors employed and profitable.

Mobility

WSDOT has expanded I-5 and I-405 in the Seattle metropolitan area to a grand degree, yet the region is plagued by congestion by every measure. Our freeway widenings have had similar fates. We continue to spend billions of dollars on highway investments that evidence has shown nationwide to induce demand. Even if this project did solve congestion in the project area, which is staggeringly unlikely, the back-up will only move south where the highway is still constrained. What this will lead to is more billion dollar projects to add auxiliary lanes to the split of I-405 and then the full I-5 Rose Quarter project that is still $1.5 billion short of being funded.

Further, the definition of congestion at anything 45 mph or lower is dangerous and reckless. The mobility policy adopted in Metro's Regional Transportation Plan uses a measure of speeds of 35 mph for more than four hours. Using a higher measure results in an outcome that is financially irresponsible and sets an untenable precedent. With speed limits that vary between 50 to 60 mph throughout the project area, this definition means a slowdown of 5 mph is worthy of billions of dollars in intervention. Yet at the same time, there are many locations in the project area and Portland where the most vulnerable road users, often from the most marginalized communities, are lacking protected or even any facilities.

There are numerous reasonable and responsible reasons for traffic to slow down including weather, construction/road work, vehicle(s) on the shoulder, and vehicles merging on and off the highway. Small changes in speed for these reasons should not be a reason to claim there is congestion and by doing so it encourages a much more robust and expansive Locally Preferred Alternative that looks more like a construction company fever dream in Texas or Florida rather than a responsible and restrained project that acknowledges that single occupant vehicles should not be further encouraged for reasons including safety, greenhouse gas emissions, microparticle emissions from brakes and tires, lack of affordability for a society dependent upon auto ownership, and insufficient resources for maintaining current transportation facilities.

Safety

This project fails to address the current safety issues within the IBR project area, even though this project provides a significant opportunity to do so. The rigid definition of congestion creates an incentive to design unsafe driving conditions by encouraging "driv[ing] a vehicle on a highway at a speed greater than is reasonable and prudent under the conditions" in violation of RCW 46.61.400 (Washington Basic Rule) and ORS 811.100.

The increased speeds that, while unlikely, are projected by building this project as a result of reduced congestion would result in a higher number and proportion of deadly crashes. By claiming that congestion can happen with as little as a 5 mph drop in speed, this project is supporting the kind of behavior that led to the deaths of over 586 people in Oregon last year (328 of which were on ODOT facilities). Based on ODOT's Crash Data Systems, the second and third leading causes of crashes were roadway departure and speed-related respectively, neither of which will be solved with a freeway that is more than double the current size and engineered for people to travel at unsafe speeds in service to relieving congestion.

IBR staff were not able to provide any breakdown of how the types of crashes would change as a result of any LPA on the table when I asked directly and at best showed a lack of meaningful preparation to discuss the topic. Crashes of all types are bundled together when claiming that this project will result in safer conditions even though serious and fatal crashes are the focus of the City's Vision Zero program and Metro's regional safety goals. IBR staff did not provide any proof or cite any data from other similar roadways to confirm the assertion that serious and fatal crashes will be drastically reduced if the total number of crashes are reduced. The projected increased speeds makes it unlikely this is the case. If the forecasted "congestion relief" fails to materialize then the crashes being prevented are of the low speed variety that more often result in vehicle damage instead of bodily harm and do not merit the expenditure of billions of additional dollars as part of this super-sized project.

Climate

Measuring emissions without any climate related goals communicates the lack of seriousness that the IBR DSEIS places on one of the core project goals. Pollution driven by increased vehicle miles traveled (VMT) expected as a result of the project goes well beyond the stated purpose and need for a replacement bridge that is centering travel by automobiles while merely tolerating every other mode of travel in its design.

This project claims to address climate change by reducing congestion. However, that assertion ignores advances in ICE technology in the last 50 years that have made vehicles more efficient in traffic and at lower speeds. Further, we know that maximizing transportation choice is the key to reducing congestion, while widening always has the opposite effect eventually. In fact, the slight increase in overall river crossings with the DSEIS project as compared to the no-build is testament to this fact.

A higher proportion of vehicles are assumed to be electric rather than internal combustion (ICE), but the analysis fails to account for the increased vehicle tonnage due to batteries, along with the environmental damage and carbon emissions associated with the mining and manufacture of those batteries, and larger dimensions as vehicle sizes and weights continue to grow. A more complete

analysis would reveal the marginal benefits of this shift lessen or even negate these anticipated greenhouse gas emissions savings.

Bicycle and Pedestrian Infrastructure

I care about, and have dedicated hundreds of volunteer hours toward, improving pedestrian and bicycle infrastructure and networks throughout the city and metropolitan area. It should indicate something that it took until the 4th page of this document to get to what may be the most important section in my mind. However this project as proposed is flawed in ways that are intentional and well considered.

More separated space for people riding bicycles and walking as part of a new bridge design will be a huge improvement over the facilities that exist today. However, many critical elements of the active transportation facility design that contribute to rider experience are lacking - with people walking and bicycling as an afterthought (rather than a focus). This is likely why even with both a new mixed-use facility and light rail extension as part of the bridge we only see a slight decrease in the number of people driving with the project (though also induced demand as highlighted below).

I remain concerned about the elevation changes in the LPAs. While all of the options are technically ADA compliant, having extended elevation gains still represents a barrier that has not been adequately addressed. There was no identifiable discussion of flat rest or observation areas that could be utilized to break up the elevation gains or otherwise gain respite out of the flow of travel for people walking or biking in the SUP. The elevation gains and losses are also concerning because the downhill portions on bicycles represent opportunities for large speed differentials and with 25' to work with there is a need to provide cues for all users to prevent conflicts. I would recommend the use of signage, paint, and textured materials to safely and consistently guide all users to the proper areas of the SUP they should be utilizing based on how they are traveling. Allowances for shy distance on bicycles will be important to incorporate as well in future design and implementation.

The helix ramp is of particular concern. First for the increased distance it adds to the trip. Just the bridge and ramp length alone make this a long trip for cyclists, not to mention that most people who use it live or are accessing destinations that are also some distance away. A solution that provides a straight shot for driving and a meandering path for people walking and bicycling around it is not how we encourage people to select the most vulnerable modes toward our climate and congestion goals. Second the safety challenges it poses due to descending bicyclists likely traveling much faster than people biking uphill or walking. As any mountain biker knows, there are limits to the brakes on our vehicles related to hills (similar to freight which we design safeguards for). A heavy hand can send you over the handlebars or, in the wrong weather conditions, skidding. For increased safety of all SUP users, I strongly recommend "[c]o-locating the shared-use path with the proposed Waterfront Station to provide additional elevator access down to Columbia Street/Columbia Way" as is outlined in 4.8.2.1 of the Transportation Technical Report – this is both more practical in better activating all of these modes in a complementary fashion and addresses some of the loudest concerns about this project. I also further encourage the IBR Team to identify more productive ways to connect downtown Vancouver facilities with the Interstate Bridge while avoiding seemingly endless loops.

In prior visits to the BAC, members, including me, have voiced concerns about proposed active transportation facilities having similarities to what exists on the Glenn Jackson Bridge (I-205 crossing of the Columbia River). That facility is an SUP that is in between the north and south bound lanes making it extremely uncomfortable, deafeningly loud, and difficult to breathe. The LPAs for the IBR provide a range of options, however they are all similar in that they will be located relatively close (14-24') to vehicles traveling 50+ mph which will result in significant noise and debris from cars and crashes and poor air quality from particulate matter. This again is not how we will encourage people to leave their comfortable cars to travel by bicycle or how we achieve environmental justice for marginalized communities that do not have the choice. We are dismayed that the location of the SUP doesn't take advantage of the planned light rail extension. Co-location, with the SUP to the west of the MAX line, rather than the current east side alignment, would provide a greater degree of separation from the noise, debris, and pollution from cars. Integration of first and last mile mode access with transit would link these systems, making them complementary rather than exclusive to each mode. It would allow for better connectivity and increase options for people using transit to access Hayden Island and Downtown Vancouver.

Going beyond the bridge itself, the IBR is an expansive project covering roughly five miles of I-5 and numerous on and off ramps and overpasses. The project area seems to have been selected to maximize the amount of construction that could be performed to "solve congestion" for the highway. It leaves bicycle connections unresolved in particular and in the hands of local jurisdictions that are not able to bring commensurate financial resources to the table. This is a mistake, especially in light of the billions that will be spent outside of the roadways directly impacted by a new bridge to "address congestion". The connection to MLK Jr Blvd is a particular concern worth spotlighting. While the IBR project area will have bicycle facilities that are generally good, they will then connect with infrastructure that ranges from decent to missing. We cannot build bike lanes to nowhere and expect people to use them (and decry when they don't). There aren't many opportunities to bring major federal investments into Portland and there are even less funding opportunities for active transportation projects. This project has a responsibility to complete the network gaps that make it possible for people to walk and bike safely and comfortably between North Portland and downtown Vancouver.

In Washington, the on and off ramps the project will build are so extensive that it balloons the footprint of I-5 to roughly 14 lanes (based on illustrative videos that the IBR Team has posted to YouTube). That comes with a price tag large enough to build out a significant portion of Portland's entire 2030 Bicycle Master Plan which would result in far more congestion relief, safety improvements, and environmental benefits. In this case, why are we not including broader network investments for people walking and bicycling on the Oregon side? Why is the City of Portland responsible for finishing the network connections? While many of the facilities could be considered world class due to the low bar for that classification and the care given to bicycling and walking within the project area we are aware that only in conjunction with world class connections will this infrastructure be activated. By omitting many of the connections by excluding them from the project area and leaving local jurisdictions holding the bag the IBR project will fail to realize the active transportation usage necessary to make bicycling as attractive as driving.

Funding and Priorities

ODOT's funding outlook is bleak. Without tolling revenues, there is not money to pay for the suite of megaprojects that make up the majority of ODOT's investment portfolio. IBR will focus billions on a single span that will inevitably be used to justify further megaprojects in the span of I-5 between IBR and I-5 Rose Quarter. Yet, this project provides the framework to financially cripple ODOT's ability to:

- address the large backlog of failing bridges throughout the state;
- fill vast remaining active transportation implementation gaps;
- address the many deadly safety issues that exist on state roadways, particularly urban arterials; and
- maintain the roadways it owns (for example, in 2023 ODOT did not have enough money to maintain snow plowing in the passes through the Cascades).

Ironically this project also promotes continued widespread tax evasion by Washington residents who have long used the easy access to the Jantzen Beach shopping center to avoid the ~10% sales taxes of Vancouver and Clark County. The limited direct access from I-5 only to/from Washington adds unnecessary complexity and expense to this project. As someone who grew up in Vancouver this type of activity is not a secret and designing a significant piece of this project to preserve low paying jobs at big box retailers is to the detriment of everyone involved.

I appreciate that this project will provide much needed safety and comfort improvements compared to the current conditions on the I-5 bridge. Having ridden across the bridge on bike, it's a harrowing experience that is immediately regretted so the prospect of something better is a relief. At the same time we must remember that better is not the same as good (or great) and if this project is to be looked back on in future decades as successful the current design won't cut it. I look forward to continued engagement as the project moves into design during my remaining time on the BAC and will continue to track this project carefully after my time there is finished.

However, this major regional project can and should do much more. I hope that the IBR Team is receptive to this advice so that we will see our City and regional visions reflected in the final DSEIS concept.

Thank you for your time and consideration,

David Stein

IBR Draft SEIS - RECORD #2655 DETAIL

First Name :	Christie
Last Name :	Goshe
Attachments :	DSEIS-2655_Goshe_Original.pdf (6 kb)

IBR Draft SEIS - RECORD #2655 DETAIL

Submission Date : 11/18/2024
First Name : Christie
Last Name : Goshe
Business/Organization/Agency :

Submission Input :

First Name:
Christie

Last Name:
Goshe

[redacted]

[redacted]

[redacted]

[redacted]

Topic Area:
Navigation

Comment:
Public transit and bicycle lanes must connect to business districts where people travel to. There should be a Vancouver/Williams connection. Additionally, cyclists should be separated from cars as much as possible, riding next to high speed vehicles en masse is noisy, dangerous, and does not increase safety. Place the bus lanes between cyclists and private vehicles as a buffer to provide more safety to cyclists as they travel. They are some of the most vulnerable road users while providing the most benefit in terms of air quality, carbon impact, noise pollution, traffic reduction, impact to the roads, health, and community.

JCA comment #: 636

IBR Draft SEIS - RECORD #2656 DETAIL

First Name :	Christie
Last Name :	Goshe
Attachments :	DSEIS-2656_Goshe_Original.pdf (6 kb)

IBR Draft SEIS - RECORD #2656 DETAIL

Submission Date : 11/18/2024
First Name : Christie
Last Name : Goshe
Business/Organization/Agency :

Submission Input :

First Name:
Christie

Last Name:
Goshe

[redacted]

[redacted]

[redacted]

[redacted]

Topic Area:
Land Use and Economy

Comment:
We should not be using more land for freeways. Destroying neighborhoods for more lanes and ramps is a mistake, we should use what we have more efficiently. This project should be right-sized so it can be more efficiently built, and lower cost to maintain. Freeway expansion has historically damaged so many places, especially minorities and low-income people.

JCA comment #: 635

IBR Draft SEIS - RECORD #2657 DETAIL

First Name :	Christie
Last Name :	Goshe
Attachments :	DSEIS-2657_Goshe_Original.pdf (6 kb)

IBR Draft SEIS - RECORD #2657 DETAIL

Submission Date : 11/18/2024
First Name : Christie
Last Name : Goshe
Business/Organization/Agency :

Submission Input :

First Name:
Christie

Last Name:
Goshe

[redacted]

[redacted]

[redacted]

[redacted]

Topic Area:
Induced Demand

Comment:
I strongly oppose increasing lanes for private vehicles due to the induced demand it creates. Give people real options for public transit that are fast, safe, reliable. Consider tolls as this project is very expensive and maintenance will be needed, this project should not take away funds from other public infrastructure projects; the individual users and corporations that utilize this bridge most should pay towards its cost. Riding public transit soul should be incentivized over private vehicle use.

JCA comment #: 634

IBR Draft SEIS - RECORD #2658 DETAIL

First Name :	Christie
Last Name :	Goshe
Attachments :	DSEIS-2658_Goshe_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #2658 DETAIL

Submission Date : 11/18/2024
First Name : Christie
Last Name : Goshe
Business/Organization/Agency :

Submission Input :

First Name:
Christie

Last Name:
Goshe

[redacted]

[redacted]

[redacted]

[redacted]

Topic Area:
Transportation

Comment:
This plan doesn't meet the needs of multi-modal transit. A half mile distance between the bike lane and bus stop makes this connection difficult and too long.

If you are counting on moving more people across the bridge, we need bus only lanes for rapid bus transit, bus service frequent enough to compete with and beat car transit times (with bus only lanes, it should be faster to get through traffic) plus carpool lanes, and safe and accessible bike lanes. Moving people in private vehicles is the most inefficient and carbon-heavy option, we don't need more lanes (which will only create induced demand and more private car users). The bridge should prioritize public transit over cars.

JCA comment #: 633

IBR Draft SEIS - RECORD #2659 DETAIL

First Name :	Sharon
Last Name :	Rixen
Attachments :	DSEIS-2659_Rixen_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #2659 DETAIL

Submission Date :	11/18/2024
First Name :	Sharon
Last Name :	Rixen
Business/Organization/Agency :	Hayden Island Resident

Submission Input :

First Name:
Sharon

Last Name:
Rixen

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

Topic Area:
Hayden Island Issues

Comment:
To Whom It May Concern:

I have been a resident in the floating home community on Hayden Island for the past 45 years. I lived here when they opened the I-205 bridge. At that time the traffic on I-5 was reduced by approximately 50%. It would make perfect sense to build a third bridge to the west of Hayden Island. This would, once again, reduce the

traffic by approximately 50% on I-5. With the continued maintenance over the years on the I-5 bridge it is still in great condition. The most sensible thing would be to build a third bridge over the Columbia River. Why has there been no consideration regarding building a third bridge?

Also, I do not want to see light rail (the crime train) stop on Hayden Island. The reason is the daily reports across the city regarding the negative issues surrounding light rail i.e. shooting, knifing, fights, bullying, etc.

Also, our floating home community will be negatively impacted by the loss of several families homes.

Thank you for your consideration

Sharon Rixen

[redacted]

[redacted]

JCA comment #: 632

IBR Draft SEIS - RECORD #2660 DETAIL

First Name :	William
Last Name :	Hinds
Attachments :	DSEIS-2660_Hinds_Original.pdf (6 kb)

IBR Draft SEIS - RECORD #2660 DETAIL

Submission Date : 11/18/2024
First Name : William
Last Name : Hinds
Business/Organization/Agency :

Submission Input :

First Name:
William

Last Name:
Hinds

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

Topic Area:
Transportation

Comment:
It has been noted the bridge is grossly oversized for the demand that it will see. The bridge design should be reevaluated to the appropriate loads.

JCA comment #: 631

IBR Draft SEIS - RECORD #2661 DETAIL

First Name :	Emily
Last Name :	Guise
Attachments :	DSEIS-2661_Guise_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #2661 DETAIL

Submission Date : 11/18/2024
First Name : Emily
Last Name : Guise
Business/Organization/Agency :

Submission Input :

First Name:
Emily

Last Name:
Guise

[redacted]

[redacted]

[redacted]

[redacted]

Topic Area:
Transportation

Comment:
As someone who primarily uses a bike and transit to get around the metro region, and who cares about environmental justice, I would like to see better side-by-side integration of transit and active transportation. The multi-use path and transit should be next to each other, for seamless transfers and ease of use. Path users should have convenient access to transit elevators, especially at elevated stations.

When I traveled regularly between North Portland and downtown Vancouver for my job, I always wore ear plugs as the noise around the bridgeheads and on the bridge was ear-splitting. By positioning transit lanes as buffers between the multi-use path and vehicle lanes can reduce noise, debris, and enhance user safety. Another issue that made travel hard was the difficult connections. I want to see a smooth, seamless connection

that’s at least as easy as that of drivers. In Vancouver: The path should extend to Evergreen to prevent the need for using a 100-foot high spiral. In Portland: Add connections to the popular Vancouver/Williams corridor in addition to the planned Kenton/Denver Ave. link.

I frequently combined transit and biking since it was faster than just biking. For the future capacity of this once-in-a-lifetime rebuilding opportunity, transit stations should be built to support four-car trains now to align with future downtown transit tunnel upgrades.
Plan for even higher capacity transit systems, such as multi-lane Bus Rapid Transit (BRT) or heavy rail, beyond the 2045 Environmental Impact Statement (EIS) horizon. We must ensure today’s infrastructure can adapt to tomorrow’s needs.
Induced Demand Consideration: Traffic modeling must realistically account for induced demand to ensure accurate projections for transit and road use.

I’m in favor of tolling to reflect the actual cost of driving, but tolls are often regressive. So I support tolling equity and think that by implementing a low-income toll discount program from the first day of pre-completion tolling, it will help prevent financial burdens on vulnerable communities.

Freeway impacts—such as noise and tolls—disproportionately affect historically marginalized communities. Addressing this requires focused, equitable solutions. ODOT and WSDOT should not ignore these impacts.

JCA comment #: 630

IBR Draft SEIS - RECORD #2662 DETAIL

First Name :	Brian
Last Name :	Luderman
Attachments :	DSEIS-2662_Luderman_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2662 DETAIL

Submission Date :	11/18/2024
First Name :	Brian
Last Name :	Luderman
Business/Organization/Agency :	

Submission Input :

Build the bridge with light rail. Thank you! Let's get it done this time!

IBR Draft SEIS - RECORD #2663 DETAIL

First Name :	Khris
Last Name :	Soden
Attachments :	DSEIS-2663_Soden_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #2663 DETAIL

Submission Date : 11/18/2024
First Name : Khris
Last Name : Soden
Business/Organization/Agency :

Submission Input :

First Name:
Khris

Last Name:
Soden

[redacted]

[redacted]

[redacted]

[redacted]

Topic Area:
Transportation

Comment:
1) Marry transit and active transportation on the same side of the bridge: Current design has the multi-use path on one side of the bridge and transit on the other, about 200 feet apart. We know multimodal trips are key for pedestrians and putting these transportation options side-by-side reduces out of direction travel, eases transfers, and has a number of additional benefits. The multi-use path should be next to the MAX line, not on opposite sides of the bridge as it is currently designed.
2) Address the current design that excludes pedestrians and people with mobility challenges: Current design does not have elevators to the multi-use path. On the Vancouver waterfront, the multi-use path is approximately 100' in the air and requires a 1/2 mile long, 4.5% grade spiral ramp, and no elevator is available. This is ableist in design and due to the elevation and distance it excludes most pedestrians and folks with mobility challenges.

The multi-use path needs to be lower or, at a minimum, have elevators available.
3) Extend the multi-use path north into Vancouver: Current design has the multi-use path ending at the Vancouver waterfront where it descends a 1/2 mile spiral ramp at 4.5% grade. We believe the path must be extended to Evergreen Boulevard (site of the Vancouver library) along the transit line so pedestrians do not face 1/2 mile out of direction travel where they lose and must regain all the elevation. This extension also more effectively connects into the rest of the active transportation network throughout Vancouver.
4) Implement robust safety measures: For people to use active transportation, they must feel safe. We are asking for lighting throughout the multi-use path, separation from freeway traffic by placing the transit line between the multi-use path and the roadway, and building/planting natural and human-made shade.

JCA comment #: 629

IBR Draft SEIS - RECORD #2664 DETAIL

First Name :	Paul
Last Name :	Boutet
Attachments :	DSEIS-2664_Boutet_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #2664 DETAIL

Submission Date : 11/18/2024
First Name : Paul
Last Name : Boutet
Business/Organization/Agency :

Submission Input :

First Name:
Paul

Last Name:
Boutet

[redacted]

[redacted]

[redacted]

[redacted]

Topic Area:
Transportation

Comment:
With traffic violence worsening in the Portland metro area and human-induced climate change raising temperatures globally, safe and efficient multi-modal transportation must be a top priority throughout the Interstate Bridge Replacement project. The current plan places the biking path and transit access on opposite sides of high-volume auto traffic, creating a physical barrier that hinders potential multi-modal uses. Additionally, cyclists must travel up a half mile ramp to reach the bike path while pedestrians must take a detour up stairs without elevator access to reach the path from the planned transit station. This plan is highly inaccessible to people with disabilities or anyone choosing to travel outside of a personal automobile, yet it could be easily remedied by placing the multi-use path adjacent to the transit lanes and extending the path until the final transit station. This change would not only improve convenience and accessibility by minimizing the

physical distance travelled and allowing for a shared elevator, but it could reduce noise and enhance safety for walkers and bikers by positioning transit lanes between automobiles and the path. Such an expensive project must focus on the future and ensure that design decisions are not near-sighted shortcuts; rather, as Metro's Regional Transportation Plan advocates, money should be spent on infrastructure that improves safety and reliability for walkers, bikers, and transit users.

JCA comment #: 628

IBR Draft SEIS - RECORD #2665 DETAIL

First Name :	Will
Last Name :	Keyser
Attachments :	DSEIS-2665_Keyser_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2665 DETAIL

Submission Date : 11/18/2024

First Name : Will

Last Name : Keyser

Business/Organization/Agency :

Submission Input :

As a daily commuter over the I5 bridge, I think it is short sided to replace our current bridge with a very similar product. Anything short of a fixed (non-drawbridge) bridge would be out of the question for many of us that use and will be paying the tolls. To say that there is no other solution due to the Pearson airfield is a disservice that could be mitigated by a land swap as well as the use of eminent domain. There are two other small airports near by.

To the actual design of the bridge there should be a 4th lane on both sides. Headed south it could allow a direct off to Jantzen Beach, while headed north it could allow a direct off to HW14 east. Light rail is not the answer for Vancouver residents. As I've seen so far I do not currently support the replacement as it stands proposed, it seems to focus on design over functionality. Unless we can write off tolls against Oregon income tax or a similar deduction for tolls I also don't support tolls either. Though I commend the teams of people and the replacement committee as a whole in their efforts, I do not like what has been brought forth thus far. Thank you for your time and listening to the citizens feedback.

IBR Draft SEIS - RECORD #2666 DETAIL

First Name :	Paul
Last Name :	Ocampo
Attachments :	DSEIS-2666_Ocampo_Original.pdf (6 kb)

IBR Draft SEIS - RECORD #2666 DETAIL

Submission Date : 11/18/2024
First Name : Paul
Last Name : Ocampo
Business/Organization/Agency :

Submission Input :

First Name:
Paul

Last Name:
Ocampo

[redacted]

[redacted]

Topic Area:
Transportation

Comment:
As a cyclist, I urge planners to reconsider a few aspects of the IBR proposed design and create a solution that prioritizes safety and convenience for all modes of transportation. The current plan routes the bike path across a major freight intersection with grade changes near freight-heavy areas. In addition, the draft separates access for the light rail and multiuse path, which complicates blended trips. Coupling the light rail with the bike path would improve safety for all. Please reconsider the design to separate vehicle travel lanes using barriers or raised active transportation pathways. Complete separation creates safety for people that are walking or biking and can also make travel more efficient for freight users. Thank you.

JCA comment #: 627

IBR Draft SEIS - RECORD #2667 DETAIL

First Name :	Josh
Last Name :	Hetrick
Attachments :	DSEIS-2667_Hetrik_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #2667 DETAIL

Submission Date : 11/18/2024
First Name : Josh
Last Name : Hetrick
Business/Organization/Agency :

Submission Input :

First Name:
Josh

Last Name:
Hetrick

[redacted]

[redacted]

[redacted]

Topic Area:
Environmental Justice

Comment:
The scale of this project is far out of sync with the need. We do need seismic upgrades to the bridge and higher-quality transit, biking, walking, and rolling facilities. However, the majority of this project's costs are going to widening highways that aren't necessary for those goals. The opportunity cost for billions upon billions of dollars is enormous — for the price of the unnecessary highway expansions in this project, we could be funding frequent regional transit; making safety improvements where they are needed most (on our high-crash corridors throughout the Metro region, not on this stretch of highway); funding safe routes to school; and so on. Even the projections included in this project are inaccurate — they predict a present that doesn't exist, let alone a future that's even further off the mark. We're getting farther from the traffic counts being relied on to justify this project, not closer. Spending $7B+ on this is theft from frontline communities who are experiencing the historical and ongoing effects of environmental racism. Communities of color and low income communities have the strongest need for improved air quality, safer streets, and better mobility; wasting this money to expand highways (and just move the bottlenecks a little bit down the road) deprives those communities of the funds needed to make real improvements in their lives.

JCA comment #: 626

IBR Draft SEIS - RECORD #2668 DETAIL

First Name :	Josh
Last Name :	Hetrick
Attachments :	DSEIS-2668_Hetrick_Original.pdf (6 kb)

IBR Draft SEIS - RECORD #2668 DETAIL

Submission Date : 11/18/2024
First Name : Josh
Last Name : Hetrick
Business/Organization/Agency :

Submission Input :

First Name:
Josh

Last Name:
Hetrick

[redacted]

[redacted]

[redacted]

Topic Area:
Transportation

Comment:
Transit facilities and paths for biking, walking, and rolling should be side by side, to simplify transfers, wayfinding, and ease of use. Multi-use paths should be much easier to use than today, which require circuitous and poorly-signed routes. They should be as direct as possible, connecting to high-quality facilities at both ends. Placing transit lanes between active transportation multi-use paths and standard travel lanes makes those multi-use paths safer, more pleasant, and more likely to be used. Both ramps and elevators should be provided when there is a significant elevation change, and elevator maintenance and repairs must be prioritized and planned for. (For example, having spare parts at the ready instead of waiting for weeks after a breakdown occurs.)

JCA comment #: 625

IBR Draft SEIS - RECORD #2669 DETAIL

First Name :	MYKLE
Last Name :	HANSEN
Attachments :	DSEIS-2669_HANSEN_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2669 DETAIL

Submission Date :	11/18/2024
First Name :	MYKLE
Last Name :	HANSEN
Business/Organization/Agency :	

Submission Input :

This EIS process isn't just an obstruction to be jumped over, it's a tool for understanding. A lot of important and concerning questions have been raised about the accuracy of this EIS and its assertions and predictions. The authors need to address the many cogent critiques of their analysis -- both their growth forecasts which contradict observed phenomena, and their unclear accounting for the massive environmental impacts that such growth in traffic could produce, including its effects on Oregon's progress toward our mandated climate goals. Until they've done that, it would be irresponsible for any elected official to go on record as supporting this massive commitment of public funds.

IBR Draft SEIS - RECORD #2670 DETAIL

First Name :	Gia
Last Name :	M
Attachments :	DSEIS-2670_M_Original.pdf (6 kb)

IBR Draft SEIS - RECORD #2670 DETAIL

Submission Date : 11/18/2024
First Name : Gia
Last Name : M
Business/Organization/Agency :

Submission Input :

First Name:
Gia

Last Name:
M

[redacted]

[redacted]

Topic Area:
Transportation

Comment:
The proposed Interstate Bridge Replacement raises concerns for multimodal transportation. One key issue is the bike route crossing a busy freight intersection, endangering cyclists and making active transportation difficult. Additionally, the separate access for the light rail and the multiuse path complicates blended trips and misses an opportunity for safer design. Coupling the light rail and bike path could allow the train to act as a buffer between cyclists, pedestrians, and vehicle traffic, enhancing safety for all road users. To meet modern mobility needs, the design should offer better integration and protection for all modes.

JCA comment #: 624

IBR Draft SEIS - RECORD #2671 DETAIL

First Name :	Jenna
Last Name :	Sjulin
Attachments :	DSEIS-2671_Sjulin_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #2671 DETAIL

Submission Date : 11/18/2024
First Name : Jenna
Last Name : Sjulin
Business/Organization/Agency :

Submission Input :

First Name:
Jenna

Last Name:
Sjulin

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

Topic Area:
Transportation

Comment:
There are several reasons to revisit the existing plan for this crossing, as detailed in the Just Crossing Alliance's "Active Transportation and Transit Vision." First, active transportation and transit should be connected in order to allow for smooth transition from one to the other. People would be more likely to utilize these modes of transport when they can do some combination of public transit and biking, etc. Putting the public transit on the opposite side of the bridge would make this much less convenient, and would likely deter

many users. Second, active transportation users should have the same access to elevators as public transit users. Again, not having this access may deter people from choosing active transportation (especially if the ramp is as frustratingly long as the one currently proposed). Third, coupling public transit and active transportation fosters a more connected community that cares for and looks out for one another. Safety and aesthetic features (lighting, sidewalks, trees, etc.) would benefit both public transit users as well as active transportation users.

Thank you for considering.

JCA comment #: 623

IBR Draft SEIS - RECORD #2672 DETAIL

First Name :	Troy
Last Name :	Winslow
Attachments :	DSEIS-2672_Winslow_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #2672 DETAIL

Submission Date : 11/18/2024
First Name : Troy
Last Name : Winslow
Business/Organization/Agency :

Submission Input :

First Name:
Troy

Last Name:
Winslow

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

Topic Area:
Cumulative Effects

Comment:
Stop telling us it’s rain as you piss on our faces. Similarly, stop selling my children’s future down river to turn a

buck. We need land stewardship and infrastructure projects aligned with our stated goals on climate change mitigation, not a mega bridge that is the product of an orgy replete with profiteers and corrupt government agencies.

JCA comment #: 622

IBR Draft SEIS - RECORD #2673 DETAIL

First Name :	Dizzy
Last Name :	Zaba
Attachments :	DSEIS-2673_Zaba_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #2673 DETAIL

Submission Date : 11/18/2024
First Name : Dizzy
Last Name : Zaba
Business/Organization/Agency :

Submission Input :

First Name:
Dizzy

Last Name:
Zaba

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

Topic Area:
Transportation

Comment:
Hello, I'm a resident of the Woodlawn neighborhood and this proposed project concerns me. The solution to traffic is not more lanes or bigger highways, it isn't expansion of car infrastructure. We need to be creating alternative and safe ways for people to get around our wonderful city. We need more and better bike lanes, affordable and safe busses and trains to disincentivize people from driving. This is going to be one of the biggest projects of our region, and we have a chance to make it really work for our communities and our

businesses.

JCA comment #: 621

IBR Draft SEIS - RECORD #2674 DETAIL

First Name :	Daniel
Last Name :	Berg
Attachments :	DSEIS-2674_Berg_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #2674 DETAIL

Submission Date : 11/18/2024
First Name : Daniel
Last Name : Berg
Business/Organization/Agency :

Submission Input :

First Name:
Daniel

Last Name:
Berg

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

Topic Area:
Transportation

Comment:
The way the bridge is currently designed will be bad for pedestrians/bikers and for light rail passengers because the pedestrian and bike path is separated from the light rail. The absurdly long ramp needed to reach the bike/ped path from the waterfront on the Vancouver side of the bridge will deter bikers and pedestrians and make it prohibitively difficult for some to use the bridge. Bikers and pedestrians should be able to use the elevators that are already going to be installed for the light rail goers. Another huge benefit of having the light

rail and bike/ped path right next to each other is that it would allow people to transition from foot/bike traffic to riding the light rail or vice versa seamlessly.

This is a bridge upgrade that needs to last for a generation. We cannot be short sighted about what the needs of this bridge will be in the future. If we want to encourage the use of public transit and active transit, we need to make sure that it is prioritized and that we do everything in our power to make it as user-friendly as possible.

JCA comment #: 620

IBR Draft SEIS - RECORD #2675 DETAIL

First Name :	Pamela
Last Name :	Ferguson
Attachments :	DSEIS-2675_Ferguson_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #2675 DETAIL

Submission Date :	11/18/2024
First Name :	Pamela
Last Name :	Ferguson
Business/Organization/Agency :	Hayden Island Resident / HINOON

Submission Input :

First Name:
Pamela

Last Name:
Ferguson

Business or Organization:
Hayden Island Resident / HINOON

[redacted]

[redacted]

[redacted]

[redacted]

Topic Area:
Hayden Island Issues

Comment:
What about mitigation for Hayden Island residents? Our lives will be affected for 10 to 15 years under construction. Is there any thought of compensation for Islanders? Promise of no tolls would be a start! A community improvement / visitor attraction / community center (subsidized grocery store during construction would be a nice idea!) would be a nice addition to Island - collaborative effort with IBR, Travel Portland singing the praises and telling the history of the Columbia River and its' Crossings. Feature Jantzen Beach history.

Provide community support and info center during construction to area residents. Area playground, skate park, something fun to distract us from this nightmare! I found no mention of mitigation for island residents in the SDEIS. There was one line about how "the Manufacturered Home Community WILL be adversely affected by noise and air pollution" and what will be done for these fine people - or do they not count as they are low income? Don't make this mistake, IBR!

JCA comment #: 619

IBR Draft SEIS - RECORD #2676 DETAIL

First Name :	Devin
Last Name :	Gaffney
Attachments :	DSEIS-2676_Gaffney_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #2676 DETAIL

Submission Date : 11/18/2024
First Name : Devin
Last Name : Gaffney
Business/Organization/Agency :

Submission Input :

First Name:
Devin

Last Name:
Gaffney

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

Topic Area:
Transportation

Comment:
I'm writing to plead that we reconsider this project. There has never been a highway widening that didn't result in just creating more traffic - this will exacerbate other issues in the city without solving the problems a replacement bridge will create. The money that's being discussed here is so much, and could be put to so many better uses in metro. Please reconsider!

JCA comment #: 618

IBR Draft SEIS - RECORD #2677 DETAIL

First Name :	Clay
Last Name :	Funkhouser
Attachments :	DSEIS_2677_Funkhouser_Origional.pdf (8 kb)

IBR Draft SEIS - RECORD #2677 DETAIL

Submission Date : 11/18/2024
First Name : Clay
Last Name : Funkhouser
Business/Organization/Agency :

Submission Input :

First Name:
Clay

Last Name:
Funkhouser

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Induced Demand

Comment:
ODOT shows that traffic volumes over the bridge are remarkably flat, up only 3% from 2003 to 2023. The IBR team is making the case that congestion will be greatly reduced, especially northbound in the evening rush hour. There are several factors that will or could REDUCE volume without all the extra lane:
1. Tolls - Shoppers. Most of the SB traffic going to Hayden Island is Washington shoppers avoiding sales tax. A round trip toll will change the savings calculation and fewer shoppers will visit, even though the proposed

design makes Washington access easy while making Oregon access more difficult.
2. Tolls - Airport. The drive from Hayden Island to PDX is faster going on 14. Adding tolls will shift some drivers decision.
3. Tolls - Washington commuters. There will be one more incentive for Washington residents to work from home if their job permits.
4. HOV lane. The current HOV lane is a joke, a leftover from the first trunnion replacement. Overall demand could be reduced if the NB HOV lane continued PAST the bridge and was enforced, creating a strong speedy incentive to carpool or use transit to get across the bridge faster.

If the extra "auxiliary" lanes are added we will still see congestion by encouraging more people to live further away from their jobs. If congestion is really the issue, let's address behavior and incentives, not add lanes.

JCA comment #: 617

IBR Draft SEIS - RECORD #2678 DETAIL

First Name :	Chris
Last Name :	Smith
Attachments :	DSEIS_2678_Smith_Origional.pdf (8 kb)

IBR Draft SEIS - RECORD #2678 DETAIL

Submission Date : 11/18/2024
First Name : Chris
Last Name : Smith
Business/Organization/Agency :

Submission Input :

First Name:
Chris

Last Name:
Smith

Business or Organization:
Just Crossing Alliance

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Other

Comment:
The Just Crossing Alliance has been informed that the Health Analysis being led by the Washington State

Department of Health will not be published until AFTER the conclusion of the DSEIS comment period. This is a deep disappointment and in our view a failure to meet the Metro MLPA condition requiring a Health Impact Assessment.
The Alliance reserved the right to submit additional comments after the Health Analysis is published and requests that a supplemental 14-day comment period be opened once the Analysis is available.

JCA comment #: 616

IBR Draft SEIS - RECORD #2679 DETAIL

First Name :	Seth
Last Name :	Truby
Attachments :	DSEIS_2679_Truby_Origional.pdf (7 kb)

IBR Draft SEIS - RECORD #2679 DETAIL

Submission Date : 11/18/2024
First Name : Seth
Last Name : Truby
Business/Organization/Agency :

Submission Input :

First Name:
Seth

Last Name:
Truby

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
I am a local Portland resident for the last 20 years who regularly rides a bike to commute to work and for recreation, and I use light rail and bus transit on a monthly basis. I'm submitting my opinion on the Interstate Bridge Replacement that the active transportation path (e.g., pedestrians & bicyclists) be alongside Light Rail and buffered from vehicular traffic by Light Rail. We want to use the same ramps, stairways, and ELEVATORS that will be provided to Light Rail users. Thank you for accepting public testimony on this important design decision.

JCA comment #: 615

IBR Draft SEIS - RECORD #2680 DETAIL

First Name :	Shelly L.
Last Name :	Galbreth
Attachments :	DSEIS_2680_RBG_Original.pdf (257 kb) image001.png (456 bytes) image002.png (5 kb) RBG II and III Objection to IBR Draft SEIS(46807028.3).pdf (257 kb)

Schwabe

November 18, 2024

Maren L. Calvert
Admitted in Washington, Oregon,
California and Hawaii
D: 360-597-0804
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VIA EMAIL: info@interstatebridge.org,
ibr-row@interstatebridge.org,
draftseis@interstatebridge.org.

Interstate Bridge Replacement Program
Draft SEIS Public Comment
500 Broadway, Suite 200
Vancouver WA 98660

RE: Comments on the Draft Supplemental Environmental Impact Statement on behalf of Renaissance Boardwalk Group II, LLC and Renaissance Boardwalk Group III, LLC (Parcel Nos. 47585000, 38279908, 502290000 and 5022950000).

Dear Interstate Bridge Replacement Team:

This office represents Renaissance Boardwalk Group II, LLC ("RBG II") and Renaissance Boardwalk Group III, LLC ("RBG III") regarding real property they own in Vancouver, Washington that appear to be impacted by the Interstate Bridge Replacement project (hereinafter, "IBR"). This letter constitutes my clients' comments on the Draft Supplemental Environmental Impact Statement (hereinafter, "Draft SEIS").

RBG II & RBG III Parcels

RBG II owns Parcel 47585000 and Parcel 38279908, which are identified for partial acquisition and temporary construction easement impacts in the excerpt of Figure 4-4 from the Land Use Technical Report of the Draft SEIS in the image to the left.

RBG III owns Parcels 502290000 and 5022950000, immediately adjacent to the south of the RBG III properties. These parcels are not identified as an "impacted property" in the DEIS, as illustrated in the excerpt of Figure 4-4 above. As explained below, this characterization is incorrect. The IBR's proposed uses of RBG II properties negatively impacts both RBG II and RBG III properties. The Draft SEIS does not adequately explain or analyze the land use, noise, visual or transportation impacts of the IBR project on RBG II and RBG III's properties.

Land Use Impacts

RBG II Parcels: Parcel 47585000 is identified by the IBR program as a "partial acquisition" property in yellow in the excerpt of Figure 4-4 of the Draft SEIS above. The Draft SEIS does not explain how much or which part(s) of this parcel the IBR proposes to acquire. If the IBR seeks only a foot of additional right of way, the proposed partial acquisition might not present a significant environmental impact or severe government taking. If, however, the IBR seeks to acquire a noticeable or material portion of the parcel, the proposed acquisition could be devastating to the RBG II's property interests.

Parcel 38279908 is identified by the IBR program in green, with dots, in the image above as a "temporary construction easement" property. We assume the IBR intends to use this parcel for construction vehicle or construction materials staging, but we do not know for sure because the Draft SEIS does not say. The materials or vehicles to be stored here, may pose environmental hazards from hazardous materials, noxious odors, noise, and other transportation-related concerns.

RBG III Parcels: RBG III Parcels 502290000 and 5022950000 are immediately south of RBG II's Parcels and are identified in the Draft SEIS without any impact overlay indications. The alleged absence of any impact is inaccurate. RBG III's Parcel 5022950000 currently has a restaurant (Who Song & Larry's) operating on it. Who Song & Larry's customers and employees park on RBG II's Parcel 38279908. If IBR's proposed construction easement on Parcel 38279908 interferes with or materially limits such parking or limits Who Song & Larry's access to the public street, the easement will have a significant negative impact on Who Song & Larry's business. If the proposed construction easement introduces hazardous materials, noxious odors, or noise into Who Song & Larry's customers' dining experience, they will have a significant negative impact on the business. The Draft SEIS fails to identify, analyze, or mitigate any of these impacts.

In addition, RBG II and RBG III intend to develop all four parcels identified in this letter. RBG II and RBG III have spent tremendous amounts of money applying for and obtaining full land use entitlements and a signed development agreement related to and benefitting all four parcels.

If the IBR's proposed uses of the RBG II parcels interferes with, delays, or prohibits development of the four parcels, then the environmental impact to the community, related infrastructure, transportation, and RBG II and RBG III's property interests from the IBR project will be severe.

If the IBR's proposed uses of RBG II's parcels occurs *after* RBG II and RBG III have been fully developed, however, then the proposed uses will likely be infeasible or potentially disastrous for the RBG Companies' businesses. The assumption in the Draft SEIS that the RBG II properties are "vacant lots," that could reasonably be used for a construction easement, therefore, is flawed. By the time the IBR project moves forward toward construction, the RBG Company properties are likely to be fully developed. Even if no demolition if improvements were required, IBR's proposed uses might significantly interfere with the new development's then-current uses and RBG III's access to a public street.

The RBG Company land use entitlements and development agreement are part of the public record. The failure to analyze these public records and the impact of the proposed IBR project on the RGB Company properties renders the Draft SEIS insufficient.

Visual Impacts

The RBG Companies are also concerned that the proposed construction will have significant visual impacts. The proposed new bridge will be taller, blocking more sunlight during the late afternoon hours. The Draft SEIS identifies 42 key viewpoints (KVPs), rates them, then analyzes the impact on those locations. The Broadway Companies' properties ae not named as a KVP, thus, the impact on them has not been identified or analyzed. KVPs 16 and 18 are close, but they are inadequate. Neither of these locations and viewpoints are representative of what customers and patrons of RBG III's restaurant view when dining. KVP 16 is a view from the 1-5 Bicycle/pedestrian facility, looking north, which is a view the RBG Companies do not have. KVP 18 is close, being on Waterfront Park, looking southwest, but it is analyzed as a recreational neighbor. The RBG Company properties are currently commercial/retail and once developed will be a mix of commercial/retail/residential. Thus, the analysis and impact are different. The rating factors in Table 4-10 of the Visual Quality Technical Report, therefore, do not adequately reflect the existing or the future visual qualities of the Broadway Companies' properties.

Transportation Impacts

In addition to these specific direct impacts, the RBG Companies are concerned the proposed interchange/on- and off-ramp modifications for SR-14, I-5, and Mill Plain, will have significant negative impacts. In the Transportation Technical Report, it appears the I-5 north C-Street off-ramp and the State Route 14 (SR-14) on-ramp at Columbia Street will be removed in both Options A and Option B – as they are called on the roll map.[1]

These changes impose significant transportation impacts on the Mill Plain/I-5 interchange, and yet, the Draft SEIS does not propose any notable improvements to the interchange or the surrounding streets. Transp. Tech. Report, section 1.1.5.1. This is inadequate. I-5 southbound in Washington currently does not meet WSDOT's mobility standard for three of the four AM peak hours and traffic "routinely spills back into downtown Vancouver." See Transportation Technical Report, section 3.3.4.1, Table 3-10, Figure 3-16, and section 3.3.4.5. Removing the C Street ramps would increase the "demand volume at the Mill Plain interchange ramps between 30% and 50%." Section 4.3.3.3. Consequently, "redirected trips…would lead to much higher delays across several intersections, as well as queuing and blocking issues through the Mill Plain Boulevard and 15th Street couplet west of I-5." Section 4.6.4.2. Despite this knowledge, the Draft SEIS fails to propose any solutions to avoid the problems the project is creating.

[1] Option A appears to be called the "Modified LPA" in the Transportation Technical Report, and Option B is referred to as the "Modified LPA without C-Street."

Instead, the Transportation Technical Report defers the analyses for mitigation need and mitigation options until after the public comment period closes.[2] This deprives the public of an opportunity to participate and does not meet NEPA requirements.

The objections outlined above illustrate that the Draft SEIS does not adequately analyze the environmental impacts of the "proposed and alternative actions" of the IBR Project and does not identify unavoidable adverse environmental impacts or the secondary (indirect) and cumulative effects of implementing the IBR project with respect to my clients' properties, as required by NEPA. Consequently, this letter identifies significant information relevant to environmental concerns that bear on the IBR project, justifying and requiring further work on the Draft SEIS.

My clients and I are available to discuss these issues and to collaboratively analyze ways the IBR might satisfactorily address these concerns so as to minimize the damages that RBG II, RBG III, and the community will suffer. Please let us know a convenient time to discuss with you. Thank you.

Best regards,

SCHWABE, WILLIAMSON & WYATT, P.C.

Maren L. Calvert

MLCA:slg

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[2] See section 7.1.6 ("Mitigation could be required for study intersections that meet agency performance standards under the No-Build Alternative but operate below agency performance standards under the Modified LPA or options. Mitigation could also be required for the Modified LPA or options if the intersection operations that did not meet agency standards under the No-Build Alternative were degraded by more than 10% under the Modified LPA or options. Final mitigation measures will be determined and agreed upon with the appropriate agency and partners as needed. The IBR Program (ODOT/WSDOT) could contribute a proportionate share toward identified mitigation to improve intersection performance as agreed to with the local jurisdiction. The Final SEIS and ROD will include all mitigation commitments that have been finalized by the time of publication; however, some mitigation measures may not be finalized until later in the project design process.")

Schwabe

November 18, 2024

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Interstate Bridge Replacement Program
Draft SEIS Public Comment
500 Broadway, Suite 200
Vancouver WA 98660

RE: Comments on the Draft Supplemental Environmental Impact Statement on behalf of Renaissance Boardwalk Group II, LLC and Renaissance Boardwalk Group III, LLC (Parcel Nos. 47585000, 38279908, 502290000 and 5022950000).

Dear Interstate Bridge Replacement Team:

This office represents Renaissance Boardwalk Group II, LLC ("RBG II") and Renaissance Boardwalk Group III, LLC ("RBG III") regarding real property they own in Vancouver, Washington that appear to be impacted by the Interstate Bridge Replacement project (hereinafter, "IBR"). This letter constitutes my clients' comments on the Draft Supplemental Environmental Impact Statement (hereinafter, "Draft SEIS").

RBG II & RBG III Parcels

RBG II owns Parcel 47585000 and Parcel 38279908, which are identified for partial acquisition and temporary construction easement impacts in the excerpt of Figure 4-4 from the Land Use Technical Report of the Draft SEIS in the image to the left.

RBG III owns Parcels 502290000 and 5022950000, immediately adjacent to the south of the RBG III properties. These parcels are not identified as an "impacted property" in the DEIS, as illustrated in the excerpt of Figure 4-4 above. As explained below, this characterization is incorrect. The IBR's proposed uses of RBG II properties negatively impacts both RBG II and RBG III properties. The Draft SEIS does not adequately explain or analyze the land use, noise, visual or transportation impacts of the IBR project on RBG II and RBG III's properties.

Land Use Impacts

RBG II Parcels: Parcel 47585000 is identified by the IBR program as a "partial acquisition" property in yellow in the excerpt of Figure 4-4 of the Draft SEIS above. The Draft SEIS does not explain how much or which part(s) of this parcel the IBR proposes to acquire. If the IBR seeks only a foot of additional right of way, the proposed partial acquisition might not present a significant environmental impact or severe government taking. If, however, the IBR seeks to acquire a noticeable or material portion of the parcel, the proposed acquisition could be devastating to the RBG II's property interests.

Parcel 38279908 is identified by the IBR program in green, with dots, in the image above as a "temporary construction easement" property. We assume the IBR intends to use this parcel for construction vehicle or construction materials staging, but we do not know for sure because the Draft SEIS does not say. The materials or vehicles to be stored here, may pose environmental hazards from hazardous materials, noxious odors, noise, and other transportation-related concerns.

RBG III Parcels: RBG III Parcels 502290000 and 5022950000 are immediately south of RBG II's Parcels and are identified in the Draft SEIS without any impact overlay indications. The alleged absence of any impact is inaccurate. RBG III's Parcel 5022950000 currently has a restaurant (Who Song & Larry's) operating on it. Who Song & Larry's customers and employees park on RBG II's Parcel 38279908. If IBR's proposed construction easement on Parcel 38279908 interferes with or materially limits such parking or limits Who Song & Larry's access to the public street, the easement will have a significant negative impact on Who Song & Larry's business. If the proposed construction easement introduces hazardous materials, noxious odors, or noise into Who Song & Larry's customers' dining experience, they will have a significant negative impact on the business. The Draft SEIS fails to identify, analyze, or mitigate any of these impacts.

In addition, RBG II and RBG III intend to develop all four parcels identified in this letter. RBG II and RBG III have spent tremendous amounts of money applying for and obtaining full land use entitlements and a signed development agreement related to and benefitting all four parcels.

If the IBR's proposed uses of the RBG II parcels interferes with, delays, or prohibits development of the four parcels, then the environmental impact to the community, related infrastructure, transportation, and RBG II and RBG III's property interests from the IBR project will be severe.

If the IBR's proposed uses of RBG II's parcels occurs *after* RBG II and RBG III have been fully developed, however, then the proposed uses will likely be infeasible or potentially disastrous for the RBG Companies' businesses. The assumption in the Draft SEIS that the RBG II properties are "vacant lots," that could reasonably be used for a construction easement, therefore, is flawed. By the time the IBR project moves forward toward construction, the RBG Company properties are likely to be fully developed. Even if no demolition if improvements were required, IBR's proposed uses might significantly interfere with the new development's then-current uses and RBG III's access to a public street.

The RBG Company land use entitlements and development agreement are part of the public record. The failure to analyze these public records and the impact of the proposed IBR project on the RGB Company properties renders the Draft SEIS insufficient.

Visual Impacts

The RBG Companies are also concerned that the proposed construction will have significant visual impacts. The proposed new bridge will be taller, blocking more sunlight during the late afternoon hours. The Draft SEIS identifies 42 key viewpoints (KVPs), rates them, then analyzes the impact on those locations. The Broadway Companies' properties ae not named as a KVP, thus, the impact on them has not been identified or analyzed. KVPs 16 and 18 are close, but they are inadequate. Neither of these locations and viewpoints are representative of what customers and patrons of RBG III's restaurant view when dining. KVP 16 is a view from the 1-5 Bicycle/pedestrian facility, looking north, which is a view the RBG Companies do not have. KVP 18 is close, being on Waterfront Park, looking southwest, but it is analyzed as a recreational neighbor. The RBG Company properties are currently commercial/retail and once developed will be a mix of commercial/retail/residential. Thus, the analysis and impact are different. The rating factors in Table 4-10 of the Visual Quality Technical Report, therefore, do not adequately reflect the existing or the future visual qualities of the Broadway Companies' properties.

Transportation Impacts

In addition to these specific direct impacts, the RBG Companies are concerned the proposed interchange/on- and off-ramp modifications for SR-14, I-5, and Mill Plain, will have significant negative impacts. In the Transportation Technical Report, it appears the I-5 north C-Street off-ramp and the State Route 14 (SR-14) on-ramp at Columbia Street will be removed in both Options A and Option B – as they are called on the roll map.[1]

These changes impose significant transportation impacts on the Mill Plain/I-5 interchange, and yet, the Draft SEIS does not propose any notable improvements to the interchange or the surrounding streets. Transp. Tech. Report, section 1.1.5.1. This is inadequate. I-5 southbound in Washington currently does not meet WSDOT's mobility standard for three of the four AM peak hours and traffic "routinely spills back into downtown Vancouver." See Transportation Technical Report, section 3.3.4.1, Table 3-10, Figure 3-16, and section 3.3.4.5. Removing the C Street ramps would increase the "demand volume at the Mill Plain interchange ramps between 30% and 50%." Section 4.3.3.3. Consequently, "redirected trips…would lead to much higher delays across several intersections, as well as queuing and blocking issues through the Mill Plain Boulevard and 15th Street couplet west of I-5." Section 4.6.4.2. Despite this knowledge, the Draft SEIS fails to propose any solutions to avoid the problems the project is creating.

[1] Option A appears to be called the "Modified LPA" in the Transportation Technical Report, and Option B is referred to as the "Modified LPA without C-Street."

Instead, the Transportation Technical Report defers the analyses for mitigation need and mitigation options until after the public comment period closes.[2] This deprives the public of an opportunity to participate and does not meet NEPA requirements.

The objections outlined above illustrate that the Draft SEIS does not adequately analyze the environmental impacts of the "proposed and alternative actions" of the IBR Project and does not identify unavoidable adverse environmental impacts or the secondary (indirect) and cumulative effects of implementing the IBR project with respect to my clients' properties, as required by NEPA. Consequently, this letter identifies significant information relevant to environmental concerns that bear on the IBR project, justifying and requiring further work on the Draft SEIS.

My clients and I are available to discuss these issues and to collaboratively analyze ways the IBR might satisfactorily address these concerns so as to minimize the damages that RBG II, RBG III, and the community will suffer. Please let us know a convenient time to discuss with you. Thank you.

Best regards,

SCHWABE, WILLIAMSON & WYATT, P.C.

Maren L. Calvert

MLCA:slg

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[2] See section 7.1.6 ("Mitigation could be required for study intersections that meet agency performance standards under the No-Build Alternative but operate below agency performance standards under the Modified LPA or options. Mitigation could also be required for the Modified LPA or options if the intersection operations that did not meet agency standards under the No-Build Alternative were degraded by more than 10% under the Modified LPA or options. Final mitigation measures will be determined and agreed upon with the appropriate agency and partners as needed. The IBR Program (ODOT/WSDOT) could contribute a proportionate share toward identified mitigation to improve intersection performance as agreed to with the local jurisdiction. The Final SEIS and ROD will include all mitigation commitments that have been finalized by the time of publication; however, some mitigation measures may not be finalized until later in the project design process.")

IBR Draft SEIS - RECORD #2681 DETAIL

First Name :	Chris
Last Name :	Smith
Attachments :	NMFSupplementalIBRDSEIS_Original.pdf (3 mb)

Date: November 18, 2024

To: Interstate Bridge Replacement Project

From: Joe Cortright, *City Observatory*
Chris Smith, No More Freeways

Subject: **Supplemental Comments on IBR DSEIS**

"Some highway engineers have a mentality … that would run an eight-lane freeway through the Taj Mahal. That is our problem."
– Oregon Governor Tom McCall, 1970

The following specific Draft Supplemental Environmental Impact Statement (DSEIS) concerns supplement the No More Freeways letter dated November 11th.

1. Failed to take a hard look at alternatives, including the Common Sense Alternative in the scoping process. Failed to consider how changed circumstances will affect these alternatives. Relies on outdated analysis. The original scoping analysis for the IBR was undertaken in 2005-2007, more than 15 years ago. IBR relies on that now outdated analysis to exclude a wide range of options including retaining one or both of the existing bridges, evaluation of the Common Sense Alternative, and evaluation of a lower level bascule crossing. By relying on this outdated information, IBR failed to take the required hard look at reasonable alternatives as dictated by NEPA.

2. Failed to separately analyze different alternatives as required by NEPA. IBR has effectively created a "pig in a poke" Locally Preferred Alternative (LPA), including several different bridge designs (lift span or fixed span), several different river clearances (178' and 116'), several different widths (with and without a second auxiliary lane), and two different bridge configurations (stacked and single level). The DSEIS labels each of these as "design options" but they are actually significantly different alternatives. Each of these multiple alternatives has different environmental impacts. The purpose of an EIS is to present, separately, the impacts of each alternative. This EIS has failed to reveal these different impacts. It therefore thwarts the fundamental purpose of NEPA which is to inform the decision about which alternatives have the least impact on the

environment. If this LPA is adopted, the public cannot know which of the many alternatives have been selected and on what basis.

3. Failed to accurately disclose visual impacts. The IBR LPA will be a massive bridge and elevated freeway towering as much as 80 and 100 feet over the Vancouver waterfront, and over downtown Vancouver and Hayden Island. The project has released only minimal and highly distorted computer generated images showing the visual impacts of the project. The perspective chosen for these images minimizes the apparent size of the bridge and conceals how it will affect people near and under the bridge and its approaches. IBR spent more than $1 million to create a "digital twin" of the proposed project, but has produced only highly selective and highly edited images designed to minimize the apparent impacts of the project. This selective approach violates NEPA's requirement to provide objective and scientific information about the project's impacts. The IBR's strategy here mirror's the approach Robert Moses used in his failed attempt to sell the proposed Brooklyn Battery Bridge with an illustration which his biographer Robert Caro characterized as being shown from the perspective of a high-flying and myopic pigeon.

4. Failed to accurately analyze an Immersed Tube Tunnel alternative. An immersed tube tunnel could be built with much smaller environmental impacts, could completely obviate the negative visual impacts of this project. Engineers have developed a representative model showing how an immersed tube tunnel could be connected to existing roadways, eliminating the need to rebuild existing interchanges, and reducing the project's environmental impacts. IBR conducted a flawed and biased engineering assessment that rejected an immersed tunnel on inaccurate cost estimates. Cost alone is not a valid basis for excluding a reasonable alternative from full consideration.

5. Failed to analyze alternatives that would maintain the I-5 freeway underneath the Burlington Northern railroad berm. Currently, the I-5 freeway goes under the railroad berm just north of the Columbia River. This underpass through the railroad berm minimizes the environmental effects of the roadway on adjacent properties. IBR has failed to consider any alignments which would retain this alignment, and instead is only considering alignments which would elevate the freeway and associated interchanges high above the Burlington Northern Railroad.

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6. Failed to analyze a lower level bascule bridge. The IBR LPA includes only lift span options with a 116 foot river clearance. These options necessitate a very high level roadway crossing, and cause the freeway to be elevated much higher over downtown Vancouver and Hayden Island, increasing the project's visual and environmental effects. The IBR designed a lift span with a minimum clearance (in the closed position) of 92 feet, about 20 feet higher than the current bridge. A lift span could have a much lower clearance if it were constructed with a bascule opening that allowed unlimited navigation height and a lower roadway. IBR failed to evaluate this reasonable alternative as part of the EIS. A lower level bascule bridge would have much lower grades for transit and vehicle traffic, as well as for bikes and pedestrians, and would have different and much smaller visual impacts.

7. Failed to consider retaining one or both bridges to limit impacts of the project. The DSEIS fails to evaluate the option of retaining one or both existing highway bridges as part of a project alternative. The newer of these bridges was built in the 1950s. Earlier work done for the project determined that the bridges could be seismically retrofitted to significantly reduce the danger of collapse. The DSEIS failed to revisit or update the analysis contained in the 2008 EIS which had partially analyzed the "supplemental" bridge alternatives. Retaining the existing bridges for some combination of pedestrian, bicycle, transit and local vehicle access would significantly reduce the size of any needed river crossing—whether a bridge or tunnel—and therefore lower the project's overall environmental impact. IBR erred by failing to advance this reasonable alternative to the DSEIS and update the analysis of this alternative.

8. Artificially widened roadway to convert to lanes. The DSEIS calls for constructing two bridge decks with a width of 79 feet each for a total width of 158 feet. This is sufficient width to be striped to include six 12 -foot travel lanes with 3.5-foot shoulders on either side of the freeway. Such narrow shoulders are common on major highway bridges in the Portland Metropolitan area and elsewhere. In addition, ODOT has 11-foot travel lanes on parts of the Interstate highway system. The DSEIS does not analyze the reasonably foreseeable possibility that the constructed roadway would be striped for six travel lanes in each direction. Because the DSEIS does not examine this possible level of capacity, the DSEIS does not accurately estimate the level of traffic and associated pollution that would be associated with this alternative.

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9. Raised vs. Embedded Rails to exclude transit use of LRT ROW. The alternate "design options" for the river crossing call for a portion of the bridge to be dedicated to light rail transit, and that the bridge be built to include 14-foot shoulders on the highway segment of the bridge to allow for so-called "bus-on-shoulder" transit operations. As noted above, the highway portion of the bridge crossing could easily be re-striped for general purpose traffic lanes, resulting in impacts not disclosed in the DSEIS. The light rail design calls for "raised" rails, where the rails are mounted on blocks on top of the roadway, making it impossible for this right of way to be used by non-rail vehicles, such as buses. The DSEIS fails to analyze the use of "embedded" rails for the light rail vehicles. Embedded rails are flush with the roadway, and allow other vehicles, such as buses, and also emergency vehicles--to use the transitway. If the DSEIS had incorporated embedded rather than raised rails, it would not be necessary to build over-wide shoulders on the highway portion of the project to accommodate "bus-on-shoulder" operations, because buses could use the LRT transitway. Furthermore, keeping buses on the transitway would avoid the potentially dangerous merges of traffic across buses operating on shoulders. The overall width of the highway portion of the project could be reduced if the project used embedded rails, thereby reducing the bridge's footprint and environmental impacts. The DSEIS erred by failing to analyze this reasonable alternative.

10. Failed to consider removing or not rebuilding interchanges. The DSEIS proposes to partially or entirely rebuild seven interchanges on I-5 between Vancouver and Portland. The DSEIS fails to analyze whether one or more of these interchanges could be eliminated. Outside experts hired by the Oregon and Washington Transportation Departments formally recommended that the project could be improved, and would be safer and have better traffic circulation if one or more interchanges were eliminated.

11. Impermissibly bundled transit, tolling and highway widening. The DSEIS consists of disparate parts, some of which encourage additional traffic, pollution and environmental impacts (like the provision of additional highway capacity), and others which reduce traffic and environmental impacts (i.e. pedestrian and bike improvements, transit and the imposition of tolls on vehicles using I-5). Some of these elements increase environmental degradation, while other elements decrease environmental impacts. The

single “build” alternative in the LPA impermissibly combines both the negative and positive elements of the project, when they ought to be presented separately. A transit only alternative that added light rail, or a toll-only alternative that added tolls to the existing bridge (or a new bridge with a similar capacity of three travel lanes in each direction) would have dramatically lower environmental impacts than the project which included all these elements. The DSEIS errs by failing to provide separate transit-only, toll-only and transit-plus-toll only alternatives that do no increase the roadway capacity of the I-5 crossing.

12. Didn’t consider safety and environmental effects of a high bridge. The high clearance required for a fixed span necessitates extremely high landings for the I-5 bridge on either side of the Columbia River. The Vancouver side will be approximately 80 to 90 feet tall and the Hayden Island side will be 60 feet tall. The very high bridge produces extremely steep grades on the bridge and approaches for vehicles, and an extremely steep climb for cyclists and pedestrians, especially those entering or exiting the bridge at the Vancouver waterfront. The steepness of the bridge and ramps is likely to create significant safety hazards for traffic, especially with slow trucks and transit vehicles climbing the high grade. These effects have not been fully analyzed in the DSEIS. The height of the bridge makes the crossing difficult or impassible for persons with limited mobility who are walking, cycling or taking transit.

13. Doesn’t analyze induced demand. In the scientific literature, the principle of induced travel is well established: expanding the capacity of roadways in urban areas prompts people to drive more, increasing traffic, congestion and pollution. The DSEIS uses a false “No-Build” projection to predict impossibly high traffic levels even if capacity is not expanded, even though its technical work concedes that the bridge already operates at capacity. These false “No-Build” projections effectively conceal the effects of induced travel from added capacity. By creating a “No-Build” scenario with falsely elevated levels of driving, the DSEIS claims that it will not have negative environmental effects because traffic will increase somewhat less than in its false and inflated No-Build scenario.

14. Assumes tolls will be permanent, when then may not be. The DSEIS assumes that tolling will be permanent on I-5. Future traffic levels, and associated environmental effects are based on the assumption that all traffic will be tolled indefinitely on I-5.

However, the Oregon and Washington Transportation Commissions, which would set the toll rates for the I-5 bridges have indicated that they would reduce or eliminate tolls once any bonds used to finance bridge construction are paid off. If tolls are reduced or eliminated compared to those shown in the DSEIS, the level of traffic will be different and the environmental impacts will be very different. The DSEIS fails to comply with NEPA because it does not disclose the level of traffic and pollution associated with a bridge with reduced or no tolls. Coupled with a re-striping of the proposed 158 foot wide roadway to include as many as twelve travel lanes, and reduced or eliminated tolls, there would be much more traffic and pollution associated with the bridge than disclosed in the DSEIS. Metro traffic modeling shows that in the absence of tolling, the project will produce vastly more driving than in the No-Build scenario.

15. Fails to undertake an investment grade analysis of actual traffic. The DSEIS traffic forecast is predicated on toll levels ranging from approximately $1.50 (off peak) to $3.00 peak for private vehicles, and higher tolls for trucks. But these are not the actual toll levels that are likely to be charged for the I-5 bridge. Instead, as conceded by IBR, tolls will be set based on the results of an "investment grade" traffic and revenue analysis. An "investment grade" analysis is an independent analysis, required by federal programs and private bond markets, that is more rigorous and more accurate than the models used by state highway departments. The previous investment grade analysis prepared for this project by CDM Smith found that in order to finance the project, much higher tolls were needed than had been modeled in the previous 2008 EIS. In fact, CDM Smith found that off-peak tolls would need to be almost doubled. These higher tolls that are required produce very different traffic impacts than those disclosed in the DSEIS. Given that Oregon and Washington are preparing a new Investment Grade Analysis for the IBR which should be completed in the next few months, the EIS should be based on this more reliable forecast, rather than the flawed and less accurate modeling developed earlier.

16. Adopted a false and flawed purpose and need statement. The project's purpose and need statement, originally promulgated in 2005, and only slightly changed since then offers a false claim that traffic levels will increase on I-5 at 1.5 percent or more per year indefinitely, and that because of these increases, all alternatives must be selected to accommodate this volume of traffic. The IBR asserted in its 2022 reassessment of the purpose and need that the original purpose and need statement was "still valid." In fact, traffic volumes on I-5 have increased at much lower rates: 0.1 percent per year from

2005 to 2023, and only 0.3 percent per year from 2005 to 2019 (the last pre-pandemic year). Because the DSEIS relies on this purpose and need statement to screen alternatives, it has incorrectly excluded multiple alternatives that would provide less traffic capacity--and which would have different and smaller environmental impacts. The two state transportation departments have used these false and exaggerated growth forecasts to design a project that is much larger than needed to accommodate actual travel flows on I-5, and which will have needlessly disruptive environmental effects. In addition, the DSEIS clings to its outdated purpose and need statement even in the face of data that shows that its claimed rate of traffic growth was simply wrong. NEPA requires agencies to base their purpose and need statement of valid and current information; the sponsoring agencies have willfully chosen to ignore the incorrect information contained in the original purpose and need statement.

17. Fails to disclose likely existence and location of historic cemeteries. A risk analysis prepared by the IBR project, and obtained via a public records request shows that the project team knows or has substantial reason to believe that there are historic burial grounds in or near to the project right of way that would be disturbed as a part of the project's construction.

> Risk #309: Post-Review Discoveries - Unknown Cemetery De-Dedication – There is a risk of discovering ancestral findings or encountering a cemetery during construction or excavation activities. Such discoveries can lead to complex legal and regulatory processes, in particular the de-dedication of a cemetery. The discovery may stop work, potentially resulting in significant project delays. The legal and court proceedings for cemetery de-dedication can take 2-3 years. Interstate Bridge Project, "RISK MANAGEMENT Date: July 8, 2024 Subject: Q2 2024 Quarterly Risk Update "

The DSEIS has failed to disclose any evidence that the agencies may have about the existence and location of these burial grounds. This would have an impact on historic resources that should be described in the DSEIS.

18. The Marshall Report shows that there are deep flaws in the IBR traffic modeling. The IBR traffic modeling relies on outdated and inaccurate "static assignment" methods which fail to accurately model the spillover of congestion between adjacent roadway

segments. The IBR traffic modeling fails to adopt the more accurate and valid "dynamic assignment" modeling techniques that have been shown to overcome the inadequacies of the static assignment models. The IBR presents detailed "operations modeling" projections which purport to show the location, level and duration of traffic congestion on different roadway segments, but as Marshall points out, these estimates rely entirely on the inaccurate "static assignment" regional travel demand model. As a result, these claimed operation projections are meaningless "garbage-in, garbage-out" modeling. Marshall's analysis also shows that the true traffic bottleneck on I-5 is not the I-5 bridge, and that in fact, the actual traffic bottleneck is outside the project area, and won't be addressed by the project. Marshall's analysis shows that increasing capacity on the I-5 bridge will actually worsen traffic congestion on adjacent segments of I-5, because it will funnel additional traffic into these unresolved bottlenecks outside the project area.

19. Traffic congestion impacts to I-205 near Portland International Airport (PDX). The IBR study fails to accurately describe the diversion of traffic from the I-5 bridges to the I-205 bridges as a result of tolling. Under the LPA, the I-5 bridge across the Columbia River would be tolled, but the parallel I-205 river crossing would not. The DSEIS projections fail to accurately reflect the effect of tolls on traveler behavior because they assume, without documentation, a very high value for travel time savings, prompting estimates that few travelers will divert in response to tolls. In contrast, more realistic estimates of the value of travel time savings used in the Stantec Level 2 study commissioned by IBR (but omitted from the DSEIS) and an earlier Level 3/Investment Grade Analysis performed by CDM Smith, commissioned by the Oregon and Washington Transportation Departments (and also omitted from the DSEIS) show that I-5 tolling would produce substantial diversion of traffic, on the order of as much as 50,000 vehicles per day, away from I-5 and toward I-205. This level of traffic would produce much more congestion on I-5, and higher levels of pollution. Because many travelers would take more circuitous routes to avoid tolls, the project would increase vehicle miles traveled in the region and also increase pollution. None of these effects are accurately revealed in the DSEIS. In addition, the diversion of traffic from I-5 to I-205 will significantly increase congestion and lead to longer and less predictable travel times on I-205. Because I-205 is the principal access route for trips to and from Portland International Airport, and because airport trips are more time-sensitive than other trips, this could have significant economic impacts.

20. Significant problems with transportation modeling for the IBR. No More Freeways included in its comments all the issues raised by Joe Cortright of City Observatory in his critique of the transportation modeling prepared for the DSEIS. The transportation models used by IBR are deeply flawed, not calibrated to actual traffic counts, fail to account for capacity constraints, dramatically over-state truck traffic, fail to follow professional standards and agency guidelines, have been manually modified without documentation, are inconsistent with the region's adopted climate policies, and fail to incorporate the findings of more recent, more accurate and more rigorous travel demand models paid for by the project's sponsoring agencies.

21. The DSEIS does not contain the Health Impact Assessment that was a condition of approval by the Metro regional government. A lesser Health Analysis was to be provided as a comment on the DSEIS but as of this writing has not appeared. This leaves the public with no opportunity to comment on health impacts of the project based on the promised analysis.

22. The DSEIS fails to address the serious flaws and omissions in the traffic modeling identified by Federal Highway Administration technical experts in 2023, including failures to adequate document assumptions, to demonstrate that models are accurately calibrated, to justify toll responsiveness assumptions, to document whether peer review included critiques of the model, and basic questions about harmonizing macro- and micro-level modeling. See: Goldstein Email and FHWA Review.

No More Freeways was founded in 2017 to oppose the proposed Rose Quarter Freeway Expansion and to demand that our elected officials and government agencies begin to aggressively pursue alternatives to endless costly freeway widenings. The states of Oregon and Washington are in sore need of significant investment in transportation infrastructure across both states - decades of disinvestment have led to crumbling roads, nearly bankrupt state DOTs unable to afford and maintain snowplows, skyrocketing traffic fatalities, and a dearth of investment in meaningful public transportation alternatives to serve the 1 in 4 Oregonians and Washingtonians who can't or don't drive.

Our organization has closely watched the revival of the Columbia River Crossing as the rebranded Interstate Bridge Replacement over the past five years. We remain staunchly supportive of efforts to invest in the construction of a right-sized replacement of this seismically vulnerable facility in line with our region's adopted goals for cleaner air, reduced traffic

congestion, improved public transportation alternatives, safer streets and climate action. Yet as we articulate in this supplemental letter, this massive highway expansion masquerading as a mere “bridge replacement” deeply jeopardizes Oregon and Washington’s budgets as well as our carbon pollution reduction targets.

We urge the federal government to deny the Interstate Bridge Program a Record of Decision under NEPA until these deficiencies are corrected and until ODOT and WSDOT right-size this megaproject.

Attachments

Federal Highway Administration, August 3, 2023, “FHWA Review 08/03/2023”.

Goldstein, Thomas (FHWA), Email to Ryan LeProwse, RE: IBR - FHWA: Traffic Tech Report Comments Check-In, September 26, 2023

Interstate Bridge Replacement Project, RISK MANAGEMENT, Date: July 8, 2024,
Subject: Q2 2024 Quarterly Risk Update

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FHWA Review 08/03/2023

This review focuses on the IBR documentation provided on modeling methodology and model results. It includes the documents provided in the administrative draft SEIS and technical reports as well as the following:

- The IBR_History Transporation_Final.pdf,
- IBR-TRN-Methods-RevAv4.docx
- Transportation Data Storymap
- Overview of Travel Demand Modeling (story map)
- Transportation Modeling (story map).

The standard we use to assess the completeness of the documentation is based on answering this question: **Can an experienced professional reproduce your analysis given access to the documentation and input data?** Additional documentation is also requested (and identified below) regarding the ability of the analysis to capture changes in future travel in response to the project alternatives. Sensitivity testing may be appropriate, as well as other comparisons that will increase confidence in the predictive ability of the individual models and the overall analytic approach.

During this review, we found there are many reports existing in various places given the long history of the project. We recommend consolidating all these technical reports into one comprehensive travel forecasting and operational analysis methodology report (see below for possible structure of such a report). Including such a report is common practice for NEPA studies and is very beneficial to establish that the analysis is adequate. It is not necessary to reproduce the content of auxiliary technical reports in detail. However, the consolidated methodology report should explain what is to be found in the other documents, and how they support the methodology and analysis conducted for this study. Insufficient documentation is commonly cited as one of the weaknesses in NEPA study litigations.

In addition to reviewing the quality and completeness of the documentation, FHWA is also concerned that the methodology and analysis use the best available data and tools relative to the metrics that are used to support the decisions documented in the EIS. The documentation should demonstrate that the models can generate plausible and suitably responsive results based on input data that accurately reflect the project alternatives. While these questions are limited to the travel and traffic modeling, it is important to apply the same standards elsewhere in the study to other models used for impact analysis, including safety.

Summary of desired documentation organization

It is important for a study of this scope and complexity to clearly document the modeling methodology. There should be a structured discussion of methods and assumptions that walks the reader from the four-step regional travel demand forecasting with diversion based on tolling strategies, to operational modeling outputs that defines how the facilities are operating, and that includes documentation of feedback from the operational modeling to the four-step forecasting model (the feedback need is discussed below). There are many models that have been deployed for this project; we need to understand how they are deployed and how (or if) they are integrated with each other.

We suggest a hierarchical approach that links from a higher-level summary to increasingly detailed documentation. One such possible structure might look like this:

- Project modeling requirements
    - Establishing Purpose and Need (traffic/travel metrics identifying the need)
    - Evaluating Alternatives (traffic/travel metrics comparing alternatives)
    - Effects Assessment (traffic/travel metrics identifying effects, or relayed to resource models such as noise, air quality or safety)
    - Potential Mitigations (metrics to demonstrate need for or adequacy of mitigation)
- For each of the identified metrics:
    - What models are used to develop the metrics
    - If the same metric (e.g., "LOS") is developed at different points by different models or for different purposes (e.g., we discussed evaluation by local jurisdictions using their own preferred metrics), call those out
- Then, for each of the models identified as sources of information for the study, explain the following:
    - Summarize use of the model
    - Explain the starting point for developing the model:
        - E.g., Portland Metro Regional Model
        - Summarize technical methodology and validation: what does this model have that are useful to this study (pointers to external technical documents)
    - Explain the changes made to the model to ensure that it meets the needs of this study
        - Summarize elements of the model that were updated for the specific application to the study. That may include:
            - Unique land use assumptions (e.g., for Hayden Island and overall changes in the broader subarea that may affect productions and attractions)
            - Zone or network changes
            - Updates to toll methodology

          External detailed documents should explain and justify the changes made, relative to the modeling requirements for this study.
        - Summarize key assumptions used to establish baseline conditions (e.g., the toll rate and expected effects of regional congestion pricing – see elsewhere as those should not be a "variable" for this study)
        - Provide validation and sensitivity analysis reports for the model that was actually used to develop the results used in this study (that may pivot from a baseline validation). Summarize in the top-level document what tests were performed to validate the model and establish that it is responsive to the needs of the study.
- The top-level document should be relatively short. Intermediate level documents may be needed especially for model adjustments and re-validation. Pointers to the complete set of earlier model technical documentation, validation reports, and peer review can be included – if there are specific findings in any of those that are important to this study, those should be called out and summarized.
- The key is to be able to navigate the modeling documentation and establish that the modeling setups are correct, complete, and responsive without getting lost in the details (unreadable documentation is in itself a risk).

The remainder of this document drills down into detailed questions regarding the modeling methodology, model setups, model validation, etc.

For the regional 4-step model and models subsequently used on the project:

In our review, FHWA sought to answer the following questions for each model used:

- Has the model been adequately calibrated and validated?
- Can the model sufficiently reproduce observed metrics for the base year?
- Is the model suitably sensitive to the type of changes to be assessed in the EIS alternative analysis
- How were the base models adapted specifically to address the analysis needs of this study?
- Does each model suitably interact with other model components? (For example, is congestion identified in microsimulation model results represented consistently in travel demand estimates from the regional model?)

2008 Peer Review Report (applies to the regional 4-step model):

The peer review was conducted in November of 2008 and the Peer Review Panel members were nationally well known in travel demand forecasting, particularly in metropolitan model development and applications. The Peer Review concluded "**we strongly believe the travel demand model and project analysis are valid and comprehensive**." While this strong endorsement carries some weight, the peer review was conducted almost 15 years ago, many of key data sources used for model development and calibrations may not reflect current travel behavior and travel choices. Also, the peer review was assessing the model in a different policy context, and it is important to establish the performance of the model relative to current tolling assumptions. The model assessed by the peers was based on data sources that have new versions, including these:

- 2011 Household travel survey
- 1987 External Travel Survey and cordon survey
- Freight Model – FAF3, 2007 CFS and 2015

Questions: To evaluate the adequacy of the peer review to the needs of the IBR study, the following questions should be considered: What background material was provided to the Panel members in the "Travel Demand Model Review notebook" in advance of the peer review meeting? Were any of the considerations and discussions regarding model validity associated with the IBR study area validation statistics when making their conclusions? Were there any discussions related to a need for developing subarea or corridor forecasting model for the CRC study or for other project studies such as the IBR?

The goal of these questions is not just to clarify what the peers reviewed in 2008, but more importantly to establish the validity and utility of the model for the present IBR study, including areas that might warrant new detailed technical review. Being "valid and comprehensive" is inevitably a conclusion that is relative to the study area and to the specific characteristics of the project, including detailed performance of auxiliary lanes and interchange reconfiguration, as well as toll diversions between the two crossings, to different travel times, and to alternate destinations in the region.

Subarea or Corridor Model:

In a typical NEPA or EIS study, a project team would develop a subarea or corridor forecasting model from a corresponding regional or statewide model to understand in greater detail the study area socio-economic characteristics and travel patterns, such as population, households and employment

distribution patterns, travel markets, through traffic, trip purposes, trip length, etc. Most corridor study teams use smaller zones, add more detailed roadway networks, conduct land use inventories, and discuss with local governments their planned and proposed development projects in the study area. In most cases, the study team would update assumptions, refine regional model parameters, and conduct more detailed model validations in the study area than regional models would. The subarea model results would then feed into a corridor microsimulation model for operational analysis and for roadway capacity designs. Likewise, the safety analysis should be based on modeling tools that are documented to suitably respond to the project characteristics. For this study, we have not seen such a subarea or corridor model was developed and validated. We would like to understand the rationale behind this, and to review documentation regarding the adequacy of the level of detail in the full regional model that was applied in lieu of detailed sub-area analysis.

Perhaps due to the lack of the Traffic Subarea model, we found the screen line locations did not cover the entire traffic study area as shown on the following graphs. These locations focus on I-5 Freeway Analysis Area and while well suited for establishing growth rates they aren't as useful for understanding route changes. Because diversion from the I-5 crossing to or from the I-205 crossing is a significant consideration in this project, screen line locations need to be expanded to cover the entire Traffic Study Area to fully represent and evaluate potential diversions between I-5 and I-205.

Toll Modeling and Sensitivity Analysis

- The current tolling modeling approach is applied to internal passenger model, reflecting changes in destination, mode, and route choices. What about other model components, particularly the truck model? The current tolling approach does take the truck route choice into consideration via traffic assignment procedures, however it is unclear if there are impacts on destination choices.
- There are, inevitably, many modeling assumptions made for the different model components. These assumptions need to be clearly identified and supported with respect to their reasonableness overall and for their specific application to this project. Please list those relevant literature or data sources to back-up these assumptions. For example many factors are applied for both base and future years, such as value of time, transponder use rates, factors applied for mode choice (i.e. 75% of the toll when determining which travel mode to use); and destination choices (only 25% of the toll is used in determining trip distribution). Some of these factors might be suitable for the base year model, but will they be applicable for 2045 forecasting?

- As the coefficients of OR2WA and WA2OR (Columbia River crossing) used in the destination choice model were calibrated based on the 2011 household travel survey, were they examined to verify that they remain reasonable after introductions of toll and LRT service? These factors establish a fixed correction for destination likelihood across the river, and it is important to establish that the project is unlikely to alter those coefficients and the resulting corrections.
- For the Toll Sensitivity Analysis, we have questions about how the Congestion Pricing Alternative (pricing on I-205) is included in this project and the alternatives analysis. Cumulatively, there is certainly an effect, and we need to understand how this is considered in the decision making for the IBR project. As the congestion pricing alternative is not an alternative within this project, it is confusing to include it separately from other background traffic. One approach might be to establish a reasonable baseline assumption regarding other regional tolling that would be applied consistently just to the alternatives in the project. If the presence or absence of other regional tolls (or different approaches to how congestion pricing for the region might ultimately be implemented) may have an effect on the efficacy of certain alternatives or on the magnitude of effects that may require mitigation, those should be explored in a distinct evaluation of cumulative effects from regional congestion pricing.
- How are the auxiliary lane and other LPA options considered in the modeling and demand modeling? Full documentation of the representation of these alternatives in the models should be provided, as well as discussion of how microsimulation and regional demand models are ensured to be consistent. This is especially important given the ramp-ramp spacing and the heavy freeway movements.

Land Use Accessibility

- Changes were made to Hayden Island land use relative to the regional model; the specific changes and the motivation for them need to be clearly documented.
- Document changes to regional mobility that might influence future land use and development and assess whether those might merit adjusting future land use inputs to the model for one or more of the build scenarios. If there is no merit in adjusting future land use, please note the rationale (e.g., lack of developable land).

Freight Modeling:

- Freight movements as modeled deserve further discussion relative to generation, production and distribution (more so given tolling and differentials and expected differences in trip patterns). In particular, freight movements within the region (internal-internal), in and out of the region (internal-external) and across the region (external-external) should be considered with respect to tolling. Trips with an internal end should be considered with respect to possible impacts on trip generation and trip distribution, in addition to route assignment.

Transit Modeling

- Has the FTA STOPS modeling approach been used to check if the regional model replicates current transit travel conditions in the study corridor?
- Park & Ride (impact), based on the 2018 license plate survey, Delta Parkway had nearly 18% from Washington state. With toll and LRT, P&R locations in the model might need to be analyzed to see if they are reasonable.

Microsimulation

- There needs to be a discussion of how the VISSIM model was set up / coded.
- Does the model incorporate an adequate representation of the local facilities especially at the ramp terminals and along major routes to demonstrate the system function between the arterial and interstate system and to adequately address diversion magnitude and impacts.

Calibrating/Validating Models:

Have the travel forecasting and traffic microsimulation models used in this study been appropriately calibrated and validated?

- Reproduces metrics for the base year
- Is suitably sensitive to the type of changes to be assessed in the EIS alternative analysis
- Suitably addresses interactions between different model components
- Clearly documents how the model was adapted to support this project, including recalibration, redrawing zones, representing additional network features, or anticipated future developments, and validation against the most recent available observed data, including new counts or surveys.
- How have bi-state standards for microsimulation modeling been harmonized? Has that procedure been documented?
- What is the confidence level agreed to by the two states to determine the adequate number of microsimulation runs and what is the acceptable error target in the data (based on which MOE) for calculation of the number of runs

Scaling Models:

- Are models at different scales suitably linked in the technical analysis?
    - Is congestion identified in the microsimulation propagated back to inform in some fashion the destination/route choice in the demand model
    - Are destination/Route Diversions in response to tolls and congestion reasonable, including, for example, redistribution of trips that may cross the river to destinations that do not entail a river crossing.

Performance Metrics:

- Are the metrics required to support the decisions clearly identified and technically supported with suitable models? Having a summary table as described here will help establish the suitability of the analysis performed.

    - Which metrics are required and for what element of the study (P&N, Alternative Screening, Impact Evaluation)? It is desirable to include a table listing these metrics (in effect, all the numbers derived from modeling that are used to evaluate the alternatives and estimate project impacts)
    - The table and associated discussion should identify how each metric is generated technically (with pointers into existing technical documentation as needed). In the summary table, it should be explained which model is used to generate which metrics and (if relevant) at which point in the analysis. If, for example, an LOS value is reported in different places possibly using different modeling tools, that should be identified and any differences in the estimates explained and reconciled.
    - Metrics for IMAR and related Federal review and approval should be included in the list of required metrics and the models used to estimate them should be clearly identified.

IMAR metrics include those required to establish that the facility operates at an acceptable level with focus on ramp terminals, weave, and merge/diverge areas. Other Federal approval needs include traffic estimates required for noise and air quality analysis that may address speed, time period of analysis, anticipated fleet composition (including freight/trucks), congestion bottlenecks and so on.

- It is reasonable to develop “non-standard” performance metrics as long as the definition of the metric and estimation methodology are clearly explained, and the use of that metric in the study is well-motivated.

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Subject: RE: IBR - FHWA: Traffic Tech Report Comments Check-In

Good morning all;

Below are some of our comments on the following documents:
Updated Transportation Methods Report
New VISSIM Validation/Calibration Report
New Travel Demand Model Methods Report

Chung Tran (please see first attachment for detailed comments):
I have gone through the IBR VISSIM calibration memo, the way this was calibrated we cannot accept
as calibrated (see details comments).

Monica Pavlik (see second attachment for comments):
Main methods and assumptions document: The documents don't discuss MOEs and the relationship to the questions that we need answered based on the purpose and need as well as the interstate access modification. It is also not explain how the MOEs that ODOT and Wash DOT use are translated from the model outputs.

Jeremy Raw:
I have been through the modeling methodology document and will be ready to discuss it tomorrow. There are competing notions of how the toll modeling was done and they need to be a lot clearer about what they did and why (the original CRC method was not good for reasons we can talk about). It will be very important to include an estimate of diversion between the bridges and associated congestion up and downstream. They included the recent I-205 document as an appendix (for the southern crossing EA from earlier this year) for some reason: that's actually a decent example of showing metrics and tools, and the toll methodology was a bit better than the original CRC approach.

Supin Yoder:
I still have concerns there are no study area validation statistics and market analysis. The consultant

team needs to explain why they skipped the state of practice step and they need to provide justifications that regional models are sufficient for the IBR NEPA study.

Joel Barnett:
The scope of the analysis needs include the local street network to the at least the first major intersection on either side of the proposed change in access (if the plan is to use this Methods document as the M and A for the IJR/IMR/ARR/IAMR). I point to lines Page 31, lines 17-20 and lines
32-33 which seem to suggest a historical discussion, but no analysis of the crossroads outside of the ramp terminals. I would expect that they clearly identify in sufficient detail on how they plan to analyze the impacts to safety on the crossroads up to at least the major intersection.
Like other comments, the MOEs are unclear and should be directly stated. Speaking to the WSDOT side of the river, the focus should be on fatal and serious injury crashes and the methods should support analyzing for those severities. I suspect this is probably the same for Oregon, but the fact that I cannot use this document to determine that is an indication of the lack of necessary information.
Regarding Page 32, Line 8-13. Like the operations analysis, the safety analysis should reflect the disaggregated impacts of the designs at each interchange to understand what is improving and what may be degraded within the study area. Assessing collectively will not suffice for an IJR/IMR/ARR/IAMR.

Thanks,
Tom

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RISK MANAGEMENT

Date: July 8, 2024

Subject: Q2 2024 Quarterly Risk Update

CONTENTS

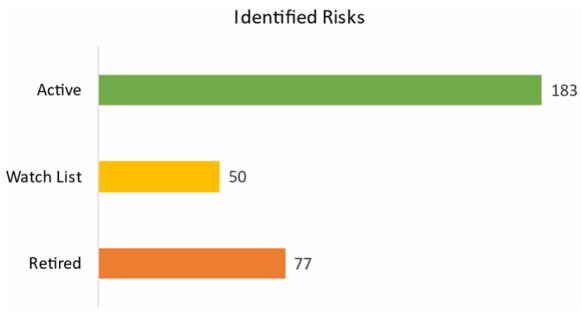
PURPOSE

Risk Management of the Interstate Bridge Replacement (IBR) Program is essential for timely decision making and to reduce the impacts of risks and uncertainties that may significantly impact the program's progression and cost. During June 2024, working sessions were coordinated and held with IBR leadership and technical leads to identify new risks, develop risk management strategies and action plans, re-evaluate the risk probabilities and cost/schedule impacts with information available at the time of the work sessions, and retire risks that were no longer relevant (e.g., realized, duplicate, had been mitigated, etc.). This memorandum highlights the status of the IBR program risk register, key risk management priorities, and the top program risks. Many of the risks facing the program are dependent upon actions that must be put into place or decisions needed by certain deadlines, as identified in the risk response strategies and action plans.

RISK REGISTER STATUS

During the working sessions the team identified 12 new risks that could impact the program; six were related to Contract Procurement, three to Environmental, two to Structures, and one to Finance. Key concerns addressed by the new risks include new Buy America/Buy American Act (BABAA) requirements, known and unknown cultural resource discoveries, the revised Preliminary Navigation Clearance Determination (PNCD) for the fixed span bridge, the approach fill north of Hayden Island Drive, the Evergreen Complex scope, and Bridge Investment Program (BIP)/Mega Grant agreement execution timelines. For more information on the new risks identified this quarter, please see the *New Risks* section of this memorandum.

The charts on the following page delineate both the total number of identified risks and the allocation of risk severity based on the relative severity in the risk managed state, for Engineering and Design, Construction, and Other Risks categories. Construction, including Contract Procurement and Delivery Method risks, accounts for 46% of the risk exposure currently identified, driven by the potential of material procurement delays, existing conditions and demolition, construction scheduling and staging, and uncertainties with contract packaging. Engineering and Design risks (e.g., Civil/Drainage, Environmental, Geotechnical, Structural, and Transit) represent 48% of the relative degree of risk exposure identified for the IBR program thus far, primarily driven by the risks categorized as Environmental. Key risk drivers in the Environmental category include cultural resource findings and natural resource conservation, delays to timelines for processes such as Section 106, 4(f), 6(f), and Federal Lands to Parks (FLP), and external agency review times for technical reports such as the Draft Supplemental Environmental Impact Statement (DSEIS) and NEPA analysis.



Watch List: Considered issues that will be addressed through normal project delivery circumstances. Items on the watch list are tracked throughout project delivery. If more information emerges that indicates that this could become a risk to the project, they are quantified in the Risk Register.

Risk Management and Priorities

It is imperative that the IBR program continues to engage in active risk management to minimize the threats, and maximize the opportunities, the program may be exposed to. Continuing to utilize the risk management process to identify, analyze, respond to, and monitor and control risk will support effective program management, as well as provide information for action in the proper handling of risk effects.

Risk management is a collaborative and continuous process that requires input from key program partners and interested parties. Future risk management activities will include focusing on risks with the highest relative risk severity identified and monitoring risks at consistent intervals. If risks begin to materialize, the execution of risk response strategies as early as possible is imperative. If risks fully materialize, it is recommended to identify and evaluate impacts and appropriate response mechanisms as documented in the program's risk register.

To facilitate the continuous application of proactive risk response planning, the IBR program technical leads will provide updates to the risk register monthly, and the IBR program team, with key interested parties, will meet quarterly. Routine risk monitoring and control will ensure timely decision making and aid in the continued acknowledgment of uncertainties that may significantly impact the program's progression and cost. If action to manage risk is not taken and decisions are not made in a timely fashion, the impacts of the risks may be incurred, particularly in the form of schedule delays; however, if the necessary risk response strategies and action plans are proactively deployed, the impacts of the associated risks can be minimized to the extent feasible.

Quarterly Risk Update

In June 2024, 14 working sessions were held with IBR leadership and technical leads to review and update key risks for the Q2 quarterly risk update. The teams reviewed risk descriptions and actions to be taken, adjusted cost and schedule impacts as appropriate, and noted timelines for revisiting risks. This memo summarizes major changes made and updates captured during this series of meetings. For the full details of all updates, please see the IBR Risk Register.

Key Themes

- The Environmental team has developed a high-level schedule called the "executive roadmap" in conjunction with the Federal Transit Administration (FTA) and Federal Highway Administration (FHWA) which contains milestones for key NEPA deliverables. The team is engaged in continuous check-ins and coordination with both agencies to ensure compliance with the roadmap.
- The Draft Supplemental Environmental Impact Statement (DSEIS) is moving forward now that the additional analysis identified in Q1 has been resolved. The DSEIS is expected to be released in September 2024.
- Utility coordination is ongoing, and the Subsurface Utility Engineering (SUE) is to be completed early summer 2024. Work has begun on the Utility Impact Matrix and utility notifications for early packages.
- The development of the Program Management Office (PMO)/Organizational Chart is underway and is anticipated to be completed by Q4 2024 which will support the mitigation of Program Management risks.
- The tolling authority has changed from Oregon Department of Transportation (ODOT) to Washington State Department of Transportation (WSDOT). A WSDOT tolling consultant will be coming on board in July of this year.
- Six new Contract Procurement risks were identified as a result of new BABAA requirements. These include concerns regarding obtaining waivers, conflicting requirements, and procurement of various BABAA-defined materials.
- Two new Environmental risks were identified for both known and unknown cemetery de-dedication.

Risk Updates

The following details the major risk updates made during the quarterly update meetings by discipline category. The risk number, title, and relevant management comments are listed below.

Civil/Drainage

Risk #1: Stormwater Facilities
Risk #2: Use of Existing Pipes
Risk #3: Lack of Downstream Conveyance Capacity

- For the three above risks, it was noted that the drainage process is still ongoing. The finalization of the footprint will influence the impact of these risks.

Risk #65: Modification of 60" Culvert Beneath I-5

- It has been determined that the segments toward the downstream end of I-5 will need to be lowered. Coordination with the Utility team will be continued throughout Q3 to decide potential impacts.

Construction

Risk #7: River Bridge Final Design/Mobilization Schedule too Aggressive

- The in-water work window is now expected in September 2027 (previously September 2026).

Risk #273: Trestle Connection to Hayden Island

- It has been determined that there may be room (30 feet) for access in the parcel parallel to the bridge within the ROW. It will need to be verified if this is adequate to place a trestle adjacent to the property.

Contract Procurement

Risk #102: Conflicts Among IBR Contracts (SR-14 Package A and Approaches)
Risk #282: Conflicts Among IBR Contracts (Mill Plain and Washington North)
Risk #283: Conflicts Among IBR Contracts (Other)

- These risks were re-classified from Maintenance of Traffic (MOT) risks to Contract Procurement risks.

Environmental

Risk #39: Section 106 – Analysis

- The Environmental team is currently working with federal partners on a constrained agreement document schedule to ensure execution prior to NEPA FEIS.

Risk #44: Supplemental EIS (SEIS)
Risk #47: FHWA and FTA NEPA Review/Participation

- Additional analysis identified in Q1 2024 has been resolved and the DSEIS is now moving forward. A high-level schedule called the "executive roadmap" has been developed in conjunction with the FTA and FHWA which contains milestone dates for key NEPA deliverables.
- Daily check-ins are now being held to ensure compliance with the roadmap, and executives from all three parties are now meeting bi-weekly. The DSEIS is now expected to go public in September 2024.

Risk #46: External Agency NEPA Reviews

- Agency reviews with the Army Corps of Engineers (USACE) are currently up to date; however, delays are still being experienced with the Coast Guard (USCG).
- Updates based on updated traffic analyses will need to be sent to cooperating agencies, which may result in further delays.

Risk #52: USACE Permitting Delays (Levee)

- Transit improvements will be requested to be separated from Highway improvements for the levee permitting.

Risk #53: USCG Bridge Permit Delay

- Meetings have been held with the USCG this quarter. The Navigation Impact Report is currently being revised, with the intent to submit by the end of summer 2024.
- Mitigation Action #3, to investigate the potential for two separate bridge permits, has been completed.

Risk #246: DSEIS Released Early Before Finalizing

- Given that some documents were released in Q1 2024 and there was no delay experienced, the likelihood for this risk was reduced from 10% to 5%.

Risk #285: Unanticipated Mitigations Needed

- Mitigations will include flood plain fill mitigation for the City of Portland (COP). COP will be requiring offset of net fill from the program, primarily from the pile caps for the new bridge.
- A likelihood of 75% was assigned, as well as a cost impact rating of $1-3M, most likely $2M.

Finance

Risk #67: FTA Approval Delayed for Entry into Engineering or FFGA

- At least six months of delay is currently expected; the likelihood of this risk was increased from 25% to 95%.

Risk #258: Pre-Completion Tolling

- It has been determined that civil construction needed for pre-completion tolling can be performed prior, but pre-completion tolling itself cannot start before the ROD. Currently, the ROD is expected before pre-completion tolling, so the risk is minor.

Risk #274: IBR Program Seeks Federal Funding – CIG

- The likelihood for this risk was reduced from 50% to 15% as the team does not see this as a large risk.

Geotechnical

Risk #78: Bridge Foundation Changes – Construction

- The Geotechnical Data Report was received last month and is currently under review.

Risk #79: Additional or Changed Method of Ground Improvement

- The Draft GI Demonstration Program has been submitted to ODOT, and ODOT has provided comments. An initial call was held to discuss ODOT's comments, and coordination will continue to resolve questions.

Other

Risk #122: Community Workforce Agreement (CWA) / PLA

- Currently engaging in monthly coordination and still awaiting decisions regarding agreements.

Program Management

Risk #115: Late Decisions on Program Elements (Other)

- The development of the Program Management Office (PMO)/Organizational Chart is underway and is anticipated to be completed by Q4 2024.

Risk #117: Contract Administration Issues

- Agency determination (Mitigation Action #3) has been completed.
- The governance agreement is anticipated to be executed in 2025. Review of the first draft will inform this risk.

Railroad

Risk #129: BNSF Agreement Delays
Risk #130: Railroad Agreement Term Sheets Delays

- The Agreements team met with BNSF in June 2024 and have gained clarity on expected timelines.

Right-of-Way (ROW)

Risk #135: ROW Cost Increases

- The real estate team has been updating cost calculations and identifying priority parcels. The team has begun developing an advanced acquisition approach.

Risk #136: Need for Additional ROW Acquisition Identified (Other)

- Coordination with Design and Geographic Information System (GIS) teams is underway to ensure all properties within the footprints are being captured.

Risk #145: Late Changes in Design - ROW Schedule (Other)

- Utility surveys and mapping are ongoing.
- A new mitigation action to be taken was added: *ROW engineering, survey, design, and real estate teams to work together to identify the ROW layout workflow process.*

Roadway Design

Risk #86: Partner Agency Design Review Processes - 30% Design Package

- A new mitigation action to be taken was added: *Begin working with internal PA team to develop a strategy to normalize the 30% CRBA design with partners.*

Risk #87: Partner Agency Design Review Processes - Subsequent Packages, 60%, 90%

- A new mitigation action to be taken was added: *Coordinate with Procurement team to inform RFP language with respect to partner review cycles.*

Traffic

Risk #189: Additional ATMS / Toll Infrastructure

- The tolling authority has changed from ODOT to WSDOT.
- A WSDOT tolling consultant will come on board in July 2024 and is anticipated to provide more clarity on requirements.

Transit

Risk #202: Evergreen Park-and-Ride Design/Scope Changes

- The likelihood for this risk was reduced from 60% to 25% because the Evergreen Park and Ride is needed for the Capital Investment Grant (CIG).

Risk #203: Waterfront Park-and-Ride Design/Scope Changes

- It has been determined for 30% design that a Waterfront Park and Ride may not be included for the Transit project. Once an official decision is made, this risk may be able to be retired.

Risk #218: Systems Testing or Start-Up Delays

- This risk was moved to the Watch List. It is considered to be part of a standard transit project and is a minor risk at this time.

Utilities Relocation

Risk #225: Delayed Completion of Utility Agreements and Permits
Risk #233: Unidentified Utilities Encountered During Construction

- Coordination between Utilities and Agreements groups is ongoing.
- The SUE is expected to be completed in June 2024.
- Utility Notifications for early packages have been started.

Risk #226: Utilities Take Longer Than Anticipated to Implement Relocation Plan (CRB)

- Outreach to private utilities is beginning, starting with introductory emails.
- An “early” SUE area was identified to accelerate working on early packages.

Risk #227: Utility Relocation Delays (Program-Wide)

- There was a coordination meeting with state Departments of Transportations (DOTs) to discuss format and requirements for Utility Notification Letters.
- Utility Notification Letters for Highway Improvements and Pre-Completion Tolling Packages have been started.

New Risks

12 new risks were identified during the quarterly risk update working sessions. These new risks and their descriptions are listed below.

Risk #299: Revised PNCD for Fixed-Span Bridge – The USCG may not issue a revised PNCD, which is needed for a fixed-span bridge. If a revised PNCD is not issued, the program will need to elevate the decision which may delay the program schedule.

Risk #300: Approach Fill North of Hayden Island Drive – There is a risk that the Approach fill north of Hayden Island Drive is converted to structure. The base currently assumes fill. This could be an opportunity or a threat; this risk will be monitored as design progresses.

Risk #301: Decision on Evergreen Complex – There is a threat or opportunity that Evergreen scope could change from what is in the base estimate. This risk will be monitored as design progresses.

Risk #302: Expiration of Manufactured Products Waiver – There is a risk that the FHWA allows its waiver for manufactured products to expire.

Risk #303: Conflicting BABAA Requirements – BABAA requirements may be in conflict due to concurrent FHWA and FTA funding for specific packages.

Risk #304: BABAA-Defined Steel & Iron Products – There is a risk of higher cost and lack of availability for BABAA-defined steel and iron products. Waivers must now be administered at the federal level, resulting in long delays for reviews and uncertain outcomes.

Risk #305: BABAA-Defined (Permanently Installed) Construction Materials – There is a risk of higher cost and lack of availability for BABAA-defined (permanently installed) construction materials. This requirement is new as of October 2023 and impacts are unclear at this time.

Risk #306: BABAA-Defined Fabricated Materials – There is a risk of higher cost and lack of availability for BABAA-defined fabricated materials.

Risk #307: Non-Domestic Materials Waivers – Contractors may depend on being able to obtain waivers for non-domestic materials. If waivers are not able to be obtained, this may cause delay to the project.

Risk #308: Post-Review Discoveries - Known Cemetery De-Dedication – The process for cemetery de-dedication may take longer than anticipated and could result in lengthy legal processes.

Risk #309: Post-Review Discoveries - Unknown Cemetery De-Dedication – There is a risk of discovering ancestral findings or encountering a cemetery during construction or excavation activities. Such discoveries can lead to complex legal and regulatory processes, in particular the de-dedication of a cemetery. The discovery may stop work, potentially resulting in significant project delays. The legal and court proceedings for cemetery de-dedication can take 2-3 years.

Risk #310: BIP/Mega Grant Agreement Execution – If the BIP and/or Mega Grant agreement(s) are not signed prior to January 20, 2025, there is a risk of delay to receipt of funding.

Retired Risks

2 risks were retired during the quarterly update working sessions. These risks and the rationale for why they were retired are listed below.

Risk #29: Impact of New Buy America / Buy American Act (BABAA) Requirements – New risks (#302-307) were identified that capture specific impacts of this risk in greater detail and replaced risk #29.

Risk #73: Changes to IBR Toll Operations (Administration) Assumptions – Both states have agreed to the tolling administration changes and this is no longer expected to be a risk. Additionally, the cost estimates were lower than expected with this risk.

Priority Watch List Items

Watch List risks are considered issues that should be monitored and tracked throughout project delivery, but that may not necessarily have a quantifiable cost or schedule impact. The following Watch List items have been noted as priority risks for tracking and monitoring. The risk number, title, and description for each priority Watch List item are listed below.

Risk #30: Claims Associated with Third Party Agreements – Agreements with utilities and other interested parties do not have enforceable provisions that clearly establish third-party requirements (i.e., design specs, notification requirements, etc.) and third-party commitments, especially for time-sensitive obligations (i.e., design review, construction inspection, self-performed work, etc.)

Risk #72: ODOT Toll Operations Schedule – Assuming the approach to toll implementation does not change (Risk 73), ODOT Toll Program toll operations schedule may not align with IBR toll schedule, either due to delays in toll procurements or due to Toll System contractor delays. This could result in delay to the start of tolling and reduce the overall toll funding contribution.

Risk #137: Additional Condemnation – Oregon – The base estimate and schedule include typical condemnation assumptions for ODOT. If condemnation rates exceed that assumption, then costs and schedule could be impacted.

Risk #138: Additional Condemnation – Washington – The base estimate and schedule include typical condemnation assumptions for WSDOT. If condemnation rates exceed that assumption, then costs and schedule could be impacted.

Risk #156: Community Connector Size Reduction – Potential opportunity to reduce the size of the Evergreen Community Connector through discussion with interested parties.

Risk #207: Added Aesthetics to Station Features – Hayden Island and City of Vancouver areas require more architectural improvements to stations than those provided in the base case, this could result in increased cost and delays to the program.

Risk #248: Work Package Sequencing Impacts Financial Plan – If there are changes in work package sequencing, then it may impact the financial plan and could impact the different types of funding sources.

Risk #260: Interim Marine Drive Design – There is a risk of not progressing enough of the Marine Drive interim interchange (west approach) as it relates to the transit design and having enough design around the levees to obtain permits. Risk of being unable to meet permit schedule and potentially missing permit window, causing delays.

Risk #269: Third Party Agreements Process – Delays to third-party agreements or the third-party agreements process results in procurement delays.

Risk #279: Critical Utilities – Critical utilities identified late in design might impact design or construction schedule and cost.

Top Risks

The top ten combined cost and schedule risks to the IBR Program (in the managed state) and their primary action plans are:

1. Risk #7: River Bridge Final Design/Mobilization Schedule too Aggressive

   The base schedule for river bridge final design, mobilization, and permitting has been compressed to show the contractor utilizing the first in-water work window (starting September 2026). This compression may not be feasible and additional time may be required to prepare for in-water work.

   - When preparing RFP, identify opportunities to facilitate Final Design process for contractor.
   - Identify permitting needs and requirements to mitigate risk (i.e., stormwater, USCG). Consider owner procurement of critical permits.
   - Perform industry outreach and engage early with contractors to highlight risk.
   - Consider transferring risk to contractor (potential for increased bid costs).
   - Proposing supplemental geotechnical investigations in Task AE to take advantage of the 2023-2024 and 2024-2025 IWWW to provide prerequisite information for proposers in advance of procurement.

2. Risk #39: Section 106 – Analysis

   Section 106 data collection, analysis, documentation, and approvals by SHPOs and tribes as well as a signed Programmatic Agreement needs to be completed prior to updated NEPA ROD (from Supplemental FEIS) being issued.

- Complete Programmatic Agreement mitigation updates as early as possible.
- Engage in early coordination and consultation with Tribes and other interested parties/agencies.
- Add resources for investigations (Task AD) to support Section 106 analysis.
- Add resource for consulting party communication.
- Investigate opportunities to define contracts, clearing specialty consultants, and sequencing activities to mitigate potential schedule constraints.
- Frequent coordination with federal co-leads to ensure timely review and turn-around of Section 106.
- Engage in ongoing coordination with sequencing and packaging to understand when analysis will occur.

3. Risk #78: Bridge Foundation Changes – Construction

   Unforeseen/differing site conditions result in deeper and/or different shafts/foundations than anticipated. This could result from changed conditions triggered by construction.

   - Consider supplemental subsurface investigations.
   - Agency to implement proposal requirement that Bidders demonstrate ability to install foundations of the sizes and depths in the contract with similar environmental constraints.
   - Consider requiring the contractor to include a test shaft.

4. Risk #275: Limited Bid Responses Result in Re-Procurement: Approaches Contract

   Limited bid responses result in a non-competitive procurement and possible need to rebid.

   - Proactively engage the industry early and often, especially through the systematic use of RFIs and follow-up meetings prior to initiation of formal procurement, and preferably prior to deciding on the contracting methods.
   - Ensure that risk transfer provisions are reasonable, and if risks are transferred to the contractor where the contractor has less than complete control, include an allowance or other cost-sharing mechanism. Regardless of delivery method, use a contractor selection process that maximizes ability to screen for quality.
   - Conduct workshop/analysis to determine optimal river bridge contract packaging and delivery methods.
   - Consider including consultant contractor SMEs in next workshop.
   - Early issuance of draft RFP.

5. Risk #47: FHWA and FTA NEPA Review/Participation

   Timely reviews and direction are needed from FHWA and FTA to support the NEPA documentation and process, including ESA, Section 106, Section 4(f), etc. compliance and legal sufficiency reviews.

   - Identify staff resource as a point of contact (139j, other) for FHWA and FTA to engage in communication and coordination throughout NEPA process.
   - Work with agencies to develop informal agreements to work on internal agreement process that IBR follows.
   - Coordinate with FHWA and FTA on their availability and schedule meetings/deliverables as to not overload their teams.
   - Continue executive focus on the schedule between the DOTs and federal partners.
   - USDOT requests to add program to executive roadmap.

6. Risk #67: FTA Approval Delayed for Entry into Engineering or FFGA

   FTA approvals for entry to engineering and/or FFGA may be delayed for procedural reasons. The most likely cause of delay is tied to completeness of the required deliverables to move through Engineering and FFGA. This could trigger additional delays to FTA approvals for Entry into Engineering and/or FFGA.

   - Monitor and track the status and completeness of required deliverables to move through Engineering and FFGA.
   - Engage in early coordination with Partner Transit Agencies and FTA.
   - Coordinate FTA approval activities with the program scheduling team.

7. Risk #68: Transit O&M Funding

   Transit O&M funding source has not been identified. Without a committed source of operating funds, transit elements of IBR will not be able to secure FTA FFGA capital funding. Lack of a comprehensive funding plan may delay construction contract procurement.

   - Transit O&M workgroup has been established and is meeting regularly to identify issues and assist with drafting scope of agreement.
   - Identify key milestone dates.
   - Coordinate early with Legislature to identify required statutory changes for transit O&M funding.
   - Fallback action is to engage working group/interested parties early to agree on a plan of action in case of delays in Transit O&M Funding and quantify required efforts.
   - Develop a 2025 legislative plan.

8. Risk #185: Changes to Travel Demand Modeling Parameters

   Changes to current travel demand modeling parameters (2045 time period) or changes to model standard practices lead to a new model runs required; pre-ROD leads to delays. Land use changes in the program year may trigger additional analysis (i.e., Hayden Island).

   - Ensure that incorporation of travel analysis numbers is not required at the DSEIS.
   - Continue to track policy changes that may impact travel demand modeling requirements.
   - Plan for updated Metro RTP model in 2023.
   - Confirm with RTC on cross river land use and forecast.
   - If changes could result in delays, do not use them.

9. Risk #250: IBR Program Seeks Federal Funding - Non-CIG

   The IBR program seeks $1.5B in federal discretionary funding (from the BIP and Mega Programs). Failure to secure federal funding may result in delays to and/or down-scoping of the IBR program. The BIL expires at the end of 2026.

   - Work toward a path that meets grant funding's project readiness criteria, including beginning construction as soon as possible.
   - Apply lessons learned from other applicants to make IBR's applications successful.
   - Look for ways to advocate through Congressional delegation to fully fund the BIL program.
   - Identify early work packages to secure funding (i.e., east/west walls, work associated with the river bridge).

10. Risk #261: Contract Interfaces

    There is a risk from including adequate contract interfacing between each work package. As work is broken down into more contracts, more schedule contingency may be needed between each one, potentially impacting the schedule.

    - Confirm the contract packaging strategy and approach.
    - Incorporate the approach into the master schedule and identify mitigations.

Risks to Manage

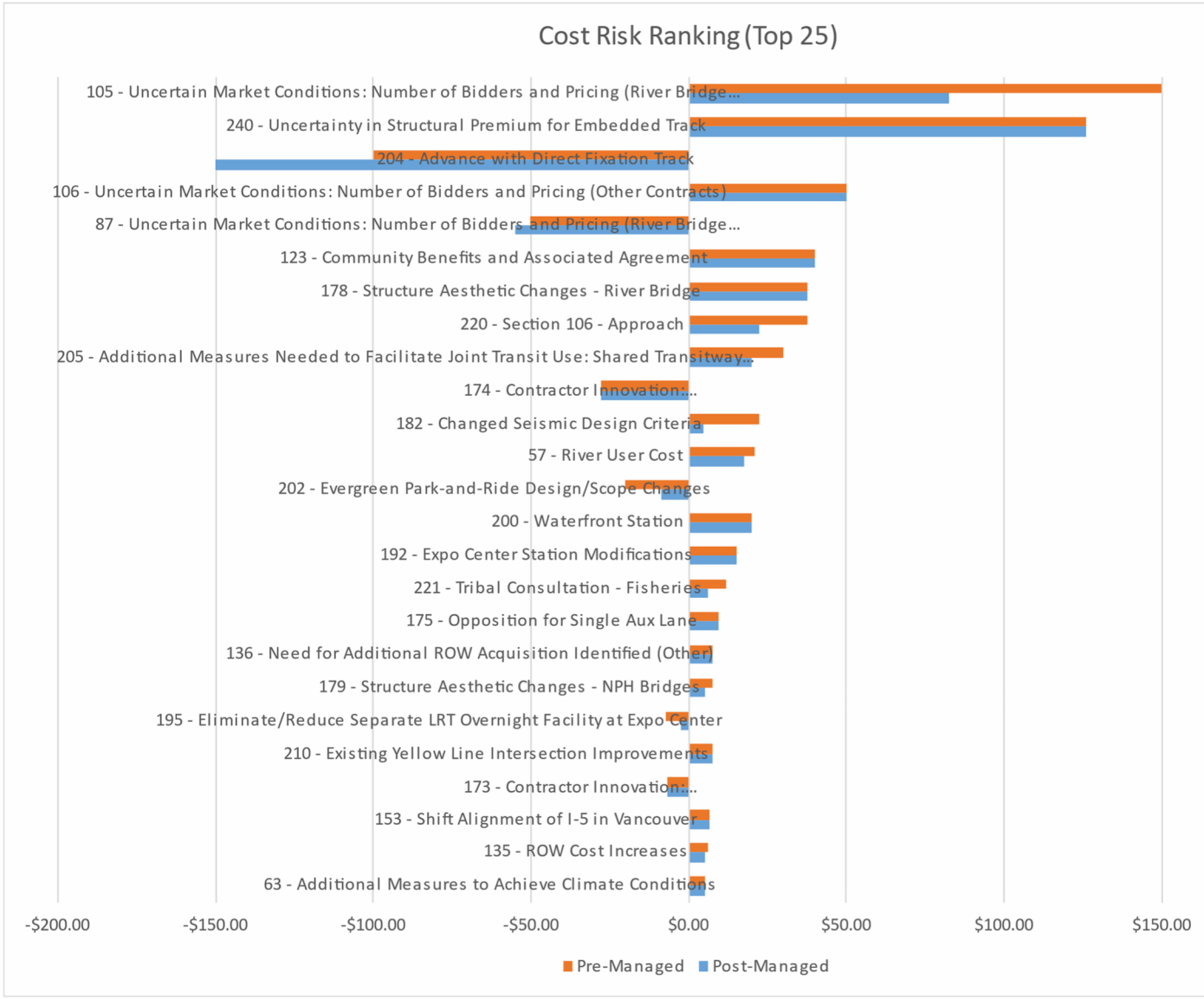
To identify the risks with the largest cost and schedule impacts, the Risk Management team has developed several plots referred to as Tornado Diagrams. In a Tornado Diagram, threats are plotted to the right of the central axis, while opportunities are plotted to the left. These diagrams present the relative degree of risk exposure from threats and the relative degree of benefits from opportunities.

The highest relative impact risks are located at the top of the diagram, and the lowest relative impact risks are at the bottom. The highest risk threats require the most management and have the highest need for appropriate risk response. The risks at the bottom of the Tornado Diagram are not insignificant relative to project cost and schedule and will still require management and risk response strategies.

The degree of risk portrayed in the Tornado Diagram is based on a calculated value that determines relative risk by multiplying the probability of occurrence and the most likely impact to generate the expected value of impact. The **orange** bar of the two-bar pair shown below for each risk represents the degree of risk in the unmanaged state. The bottom half of the pair (the **blue** bar) represents the estimated change in risk severity when the risk is in a managed state. Four types of Tornado Diagrams have been developed. The first is the cost risk exposure (in dollars), the second is schedule delay risk exposure (in months), and the third is combined effect of cost and schedule risk exposure (in scalar values). It should be noted that the risk rankings in the first three diagrams are based on the pre-managed state, while the fourth tornado diagram shows the top 15 risks to the program based on the managed state only.

The information contained in the Tornado Diagram provides an idea of how much focus and attention is needed for managing individual risks and being able to continue to manage allocated contingency and schedule slack. Risks with a very high likelihood and very high impact will require continuous attention and review and may adversely impact pools of contingency reserves and schedule buffer if they are not managed proactively. In summary, the risks that need the most focus of management are the risks that pose the most relative threat to the project, which reside at the top of the chart.

If the proposed risk response strategies are fully implemented within the risk register. the potential impact of event risk to the IBR Program could be significantly reduced. Of these, it is essential that the response strategies for the topmost risks identified in the following tornado diagrams and throughout the report are pursued in order to manage the greatest risks to the project.


Cost Risk Ranking (Top 25)
105 - Uncertain Market Conditions: Number of Bidders and Pricing (River Bridge...
240 - Uncertainty in Structural Premium for Embedded Track
204 - Advance with Direct Fixation Track
106 - Uncertain Market Conditions: Number of Bidders and Pricing (Other Contracts)
87 - Uncertain Market Conditions: Number of Bidders and Pricing (River Bridge...
123 - Community Benefits and Associated Agreement
178 - Structure Aesthetic Changes - River Bridge
220 - Section 106 - Approach
205 - Additional Measures Needed to Facilitate Joint Transit Use: Shared Transitway...
174 - Contractor Innovation:...
182 - Changed Seismic Design Criteria
57 - River User Cost
202 - Evergreen Park-and-Ride Design/Scope Changes
200 - Waterfront Station
192 - Expo Center Station Modifications
221 - Tribal Consultation - Fisheries
175 - Opposition for Single Aux Lane
136 - Need for Additional ROW Acquisition Identified (Other)
179 - Structure Aesthetic Changes - NPH Bridges
195 - Eliminate/Reduce Separate LRT Overnight Facility at Expo Center
210 - Existing Yellow Line Intersection Improvements
173 - Contractor Innovation:...
153 - Shift Alignment of I-5 in Vancouver
135 - ROW Cost Increases
63 - Additional Measures to Achieve Climate Conditions
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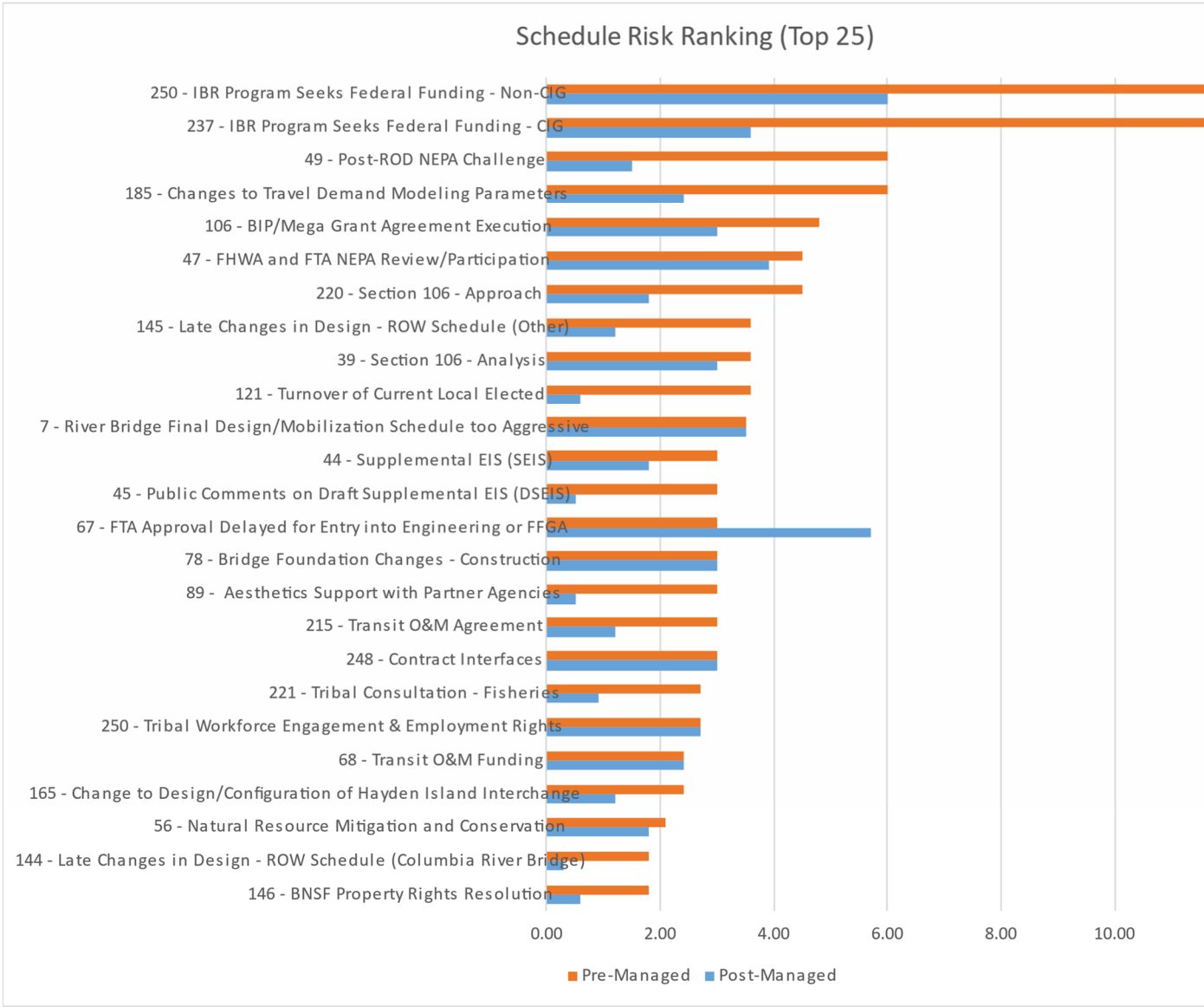
Pre-Managed
Post-Managed


Schedule Risk Ranking (Top 25)
250 - IBR Program Seeks Federal Funding - Non-CIG
237 - IBR Program Seeks Federal Funding - CIG
49 - Post-ROD NEPA Challenge
185 - Changes to Travel Demand Modeling Parameters
106 - BIP/Mega Grant Agreement Execution
47 - FHWA and FTA NEPA Review/Participation
220 - Section 106 - Approach
145 - Late Changes in Design - ROW Schedule (Other)
39 - Section 106 - Analysis
121 - Turnover of Current Local Elected
7 - River Bridge Final Design/Mobilization Schedule too Aggressive
44 - Supplemental EIS (SEIS)
45 - Public Comments on Draft Supplemental EIS (DSEIS)
67 - FTA Approval Delayed for Entry into Engineering or FFGA
78 - Bridge Foundation Changes - Construction
89 - Aesthetics Support with Partner Agencies
215 - Transit O&M Agreement
248 - Contract Interfaces
221 - Tribal Consultation - Fisheries
250 - Tribal Workforce Engagement & Employment Rights
68 - Transit O&M Funding
165 - Change to Design/Configuration of Hayden Island Interchange
56 - Natural Resource Mitigation and Conservation
144 - Late Changes in Design - ROW Schedule (Columbia River Bridge)
146 - BNSF Property Rights Resolution
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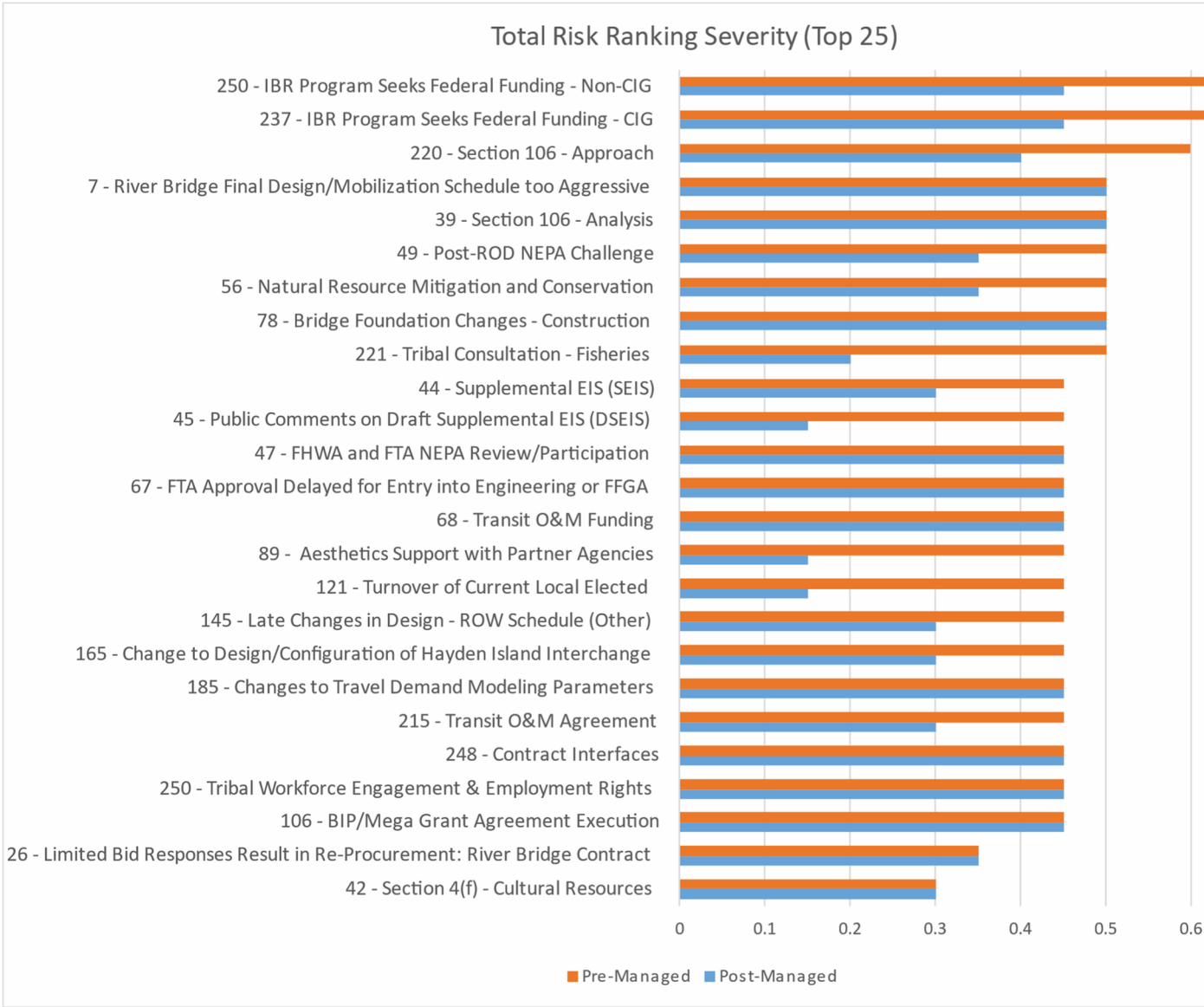
Total Risk Ranking Severity (Top 25)
250 - IBR Program Seeks Federal Funding - Non-CIG
237 - IBR Program Seeks Federal Funding - CIG
220 - Section 106 - Approach
7 - River Bridge Final Design/Mobilization Schedule too Aggressive
39 - Section 106 - Analysis
49 - Post-ROD NEPA Challenge
56 - Natural Resource Mitigation and Conservation
78 - Bridge Foundation Changes - Construction
221 - Tribal Consultation - Fisheries
44 - Supplemental EIS (SEIS)
45 - Public Comments on Draft Supplemental EIS (DSEIS)
47 - FHWA and FTA NEPA Review/Participation
67 - FTA Approval Delayed for Entry into Engineering or FFGA
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89 - Aesthetics Support with Partner Agencies
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145 - Late Changes in Design - ROW Schedule (Other)
165 - Change to Design/Configuration of Hayden Island Interchange
185 - Changes to Travel Demand Modeling Parameters
215 - Transit O&M Agreement
248 - Contract Interfaces
250 - Tribal Workforce Engagement & Employment Rights
106 - BIP/Mega Grant Agreement Execution
26 - Limited Bid Responses Result in Re-Procurement: River Bridge Contract
42 - Section 4(f) - Cultural Resources
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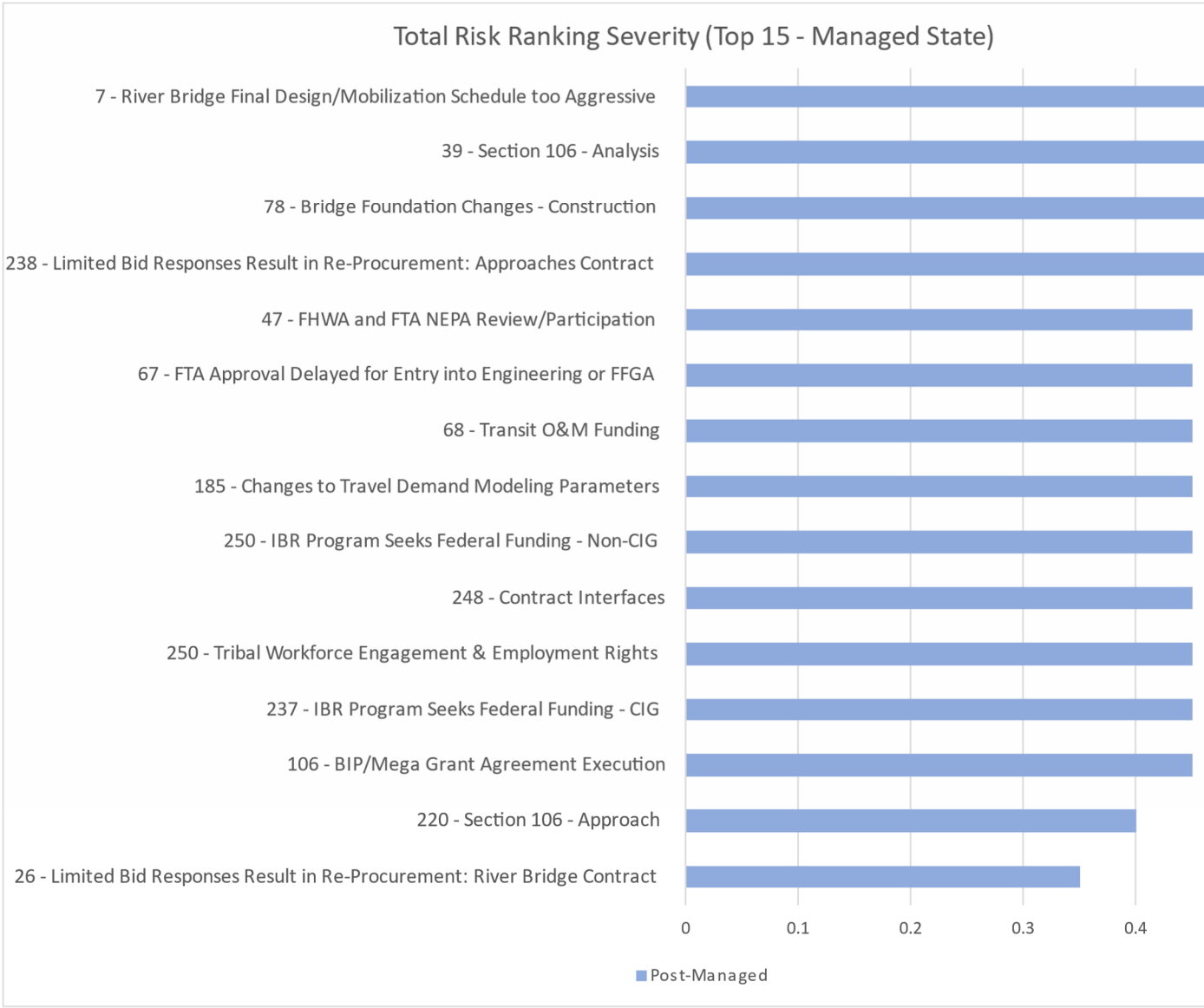
Pre-Managed
Post-Managed


Total Risk Ranking Severity (Top 15 - Managed State)
7 - River Bridge Final Design/Mobilization Schedule too Aggressive
39 - Section 106 - Analysis
78 - Bridge Foundation Changes - Construction
238 - Limited Bid Responses Result in Re-Procurement: Approaches Contract
47 - FHWA and FTA NEPA Review/Participation
67 - FTA Approval Delayed for Entry into Engineering or FFGA
68 - Transit O&M Funding
185 - Changes to Travel Demand Modeling Parameters
250 - IBR Program Seeks Federal Funding - Non-CIG
248 - Contract Interfaces
250 - Tribal Workforce Engagement & Employment Rights
237 - IBR Program Seeks Federal Funding - CIG
106 - BIP/Mega Grant Agreement Execution
220 - Section 106 - Approach
26 - Limited Bid Responses Result in Re-Procurement: River Bridge Contract
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IBR Draft SEIS - RECORD #2682 DETAIL

First Name :	Jason
Last Name :	Nolin
Attachments :	DSEIS_2682_Nolin_Origional.pdf (11 kb)

IBR Draft SEIS - RECORD #2682 DETAIL

Submission Date : 11/18/2024
First Name : Jason
Last Name : Nolin
Business/Organization/Agency :

Submission Input :

First Name:
Jason

Last Name:
Nolin

Business or Organization:
Personal as a resident of the Piedmont neighborhood

Email:
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US States:
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Zip:
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Topic Area:
Transportation

Comment:
As a resident of North Portland that lives near the IBR Program area, I am gravely concerned about the framing of the proposed project and the scale of investment in an automobile-focused freeway expansion project. The DSEIS does not adequately disclose the purpose and need of the project, obfuscates the impacts with misleading traffic models, and touts multi-modal connections that would be prohibitively difficult to use. As there are no commitments to limit trips on the bridge, this project will encourage more driving and exacerbate automobile-focused land uses — with much more significant impacts than disclosed in this misleading impact statement.
These comments are my own and not affiliated with any organization.
Purpose and need

The purpose and need are outdated and no longer apply. In 2005, when the purpose and need statements were written, 134,000 vehicles crossed the Interstate Bridge daily. The need statement claimed traffic would increase by 35% in the following 20 years, which would mean 181,000 trips over the bridge every day, by 2025. As of 2023, vehicle trips are DOWN since 2005, now at 131,867 trips per day. The DSEIS does not disclose this, and instead doubles down on the unrealistic traffic predictions by saying demand will increase another 25% in the next 20 years. This lack of disclosure appears misleading and could be interpreted as intentionally deceptive.

Traffic modeling

Future volume modeling appears to contradict documented and understood travel behaviors by predicting that volumes on the wider freeway and bridge will be lower with the expanded freeway and interchanges compared with the no-build. This is especially alarming with the four auxiliary lane (two in each direction) alternatives, where the additional lanes will clearly attract more vehicles to the bridge and yet the model shows no discernible difference compared with the two auxiliary lane option. If this is indeed what the model predicts, then it appears the project has surpassed the technical limitations of the model and calls into question the other modeled volumes the program team are basing the project design on.

VMT targets

State rules call for the reduction of VMT in the state (OAR 660 Division 44 (Metropolitan Greenhouse Gas (GHG) Emissions Reduction rule) and OAR 660 Division 12 set VMT/capita reduction targets of 20% reduction by 2035, 25% reduction by 2040, 30% reduction by 2045 and 35% reduction by 2050 (from 2005 levels)). With a wider freeway that is easier to drive, people will be attracted to driving more, conflicting with these goals. We need commitments from both states that the number of trips over the bridge will be actively monitored and tolling prices will be actively adjusted, in real time, to maintain volumes below these targets. Meeting these targets calls into question the need for the wider freeway, as mentioned above.

City modal goals

The city of Portland's modal goals calls driving trips (single-occupancy and carshare combined) to make up less than 42.5% of trips in the city by 2035. How does this project move us toward this goal? With the city moving to meet this goal, the need for a wider freeway is again called into question.

Abysmal bike, pedestrian, and transit access

With the state's goal to reduce VMT and the city's goal to increase trips by bike and transit, it is concerning to see the bicycle, pedestrian, and transit facilities built to be prohibitively difficult to access. The ramp to reach the bicycle and pedestrian facility on the Vancouver side of the bridge requires 1/2 mile of additional travel to just to get from street level to the path height - a gain of 100 feet of elevation! This is an absurd amount of out of direction travel and an absurd height for a path!

The light rail platform is also at this prohibitively high elevation, but on the opposite side of the freeway, which would require going down the 100 feet, crossing under the freeway, then going back up the 100 feet again to make a transit/biking or transit/walking connection with the bridge.

These must be redesigned to prioritize easy, comfortable, and convenient access to the bike, pedestrian, and transit facilities. It is worthless to build them at all if they are prohibitively difficult to access. The path for walking and biking across this vital bridge must also be comfortable and quiet, incorporating features that minimize road noise and views of freeway traffic, while optimizing views of the beautiful river beyond.

Land use

To meet our goals for reducing VMT and trips by automobile, we will need to prioritize transit-oriented development near transit stations and prohibit automobile-focused land uses (including parking lots, box stores,

and drive-thrus). We also need to restrict peripheral sprawl in Washington State that will be enabled by faster trips on the wider highway.

Land use analysis and neighborhood analysis does not mention decreased travel times would encourage peripheral development and increased sprawl. It also does not mention how the wider freeway encourages Washingtonians to travel to Oregon to take advantage of Oregon's lack of a sales tax and encourage box store and parking lot developments. Hayden Island has already been exploited by developers targeting Washington shoppers and is vulnerable to further development that would impact neighborhood cohesion.

Land value is likely to increase near expanded interchanges and transit stations. This is likely to place displacement pressures on low-income residents and local businesses. Equitable transit-oriented development must be included with the project to minimize risk of displacement and encourage land uses that support transit and multi-modal travel.

Environmental justice

Without commitments from WSDOT and ODOT to use pricing to maintain vehicle trips below targets, the wider freeway will put more cars on the road — increasing local air pollution from exhaust and tire particulates in the project area and for roads leading to the project area. Communities adjacent to the interstate on the north side of the Columbia River have been identified by the Climate and Environmental Justice Screening Tool as disadvantaged. These disadvantaged communities will bear a disproportionate share of the increased pollution.

Mitigations

Why is adding additional auxiliary lanes considered a "mitigation" strategy? The impacts from additional cars on the freeway, drawn by the additional lanes, have not been disclosed and would be expected to conflict with goals to reduce VMT — and cause additional impacts to air quality, noise, the climate, and neighborhood cohesion.

Mitigation strategies listed for long term effects are not emissions-related and would not contribute to meaningfully mitigate the impacts from the project. Mobility hubs, for example, would not mitigate emissions without investments in transit, bikeshare, micro-mobility, and comfortable, convenient, and safe active transportation infrastructure. This program provides an investment in transit, but as currently designed, fails to provide any of the other needed investments. Also, "telecommuting options, compressed work week/flexible work schedules" are listed as a mitigation strategy, but the IBR Program does not have the authority to implement these.

Cumulative

The cumulative analysis fails to adequately assess the impact of the original construction of this freeway on the surrounding communities and region. This investment continues to invest public money into maintaining these impacts and, as mentioned above, will exacerbate the impacts without a committed pricing strategy.

JCA comment #: 613

IBR Draft SEIS - RECORD #2683 DETAIL

First Name :	Michael
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Attachments :	DSEIS_2683_Iwata_Origional.pdf (8 kb)

IBR Draft SEIS - RECORD #2683 DETAIL

Submission Date : 11/18/2024
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Last Name : Iwata
Business/Organization/Agency :

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Michael

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Phone:
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US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
To help encourage people to use more efficient methods of transportation, we need to make sure we're encouraging the correct behaviors. We need a bridge that welcomes people walking, and biking, and accessing public transit—by ensuring seamless, accessible pathways without extra distance or difficult grades. Easy, convenient, and safe access to the bridge extends well beyond the bridge and relies on connections with safe bike paths and sidewalks. By integrating open views, rest areas, and close and fast transit access, the bridge

can become a safe, enjoyable route for all.

To ensure public safety, we absolutely need protective barriers, well-lit routes, and comfortable features like shading and rain protection. A commitment to inclusive design prioritizes the safety and comfort of all ages, abilities, and backgrounds, especially underserved and vulnerable groups.

We can’t afford to continue subsidizing driving above walking, biking, rolling, and using transit. We need a bridge design that maximizes value with adaptable features and without costly retrofits. By building with durable, cost-effective materials and enhancing local access, the bridge can become a sustainable, high-value investment for local businesses, job access, and community development.

JCA comment #: 612

IBR Draft SEIS - RECORD #2684 DETAIL

First Name :	Gabrielle
Last Name :	Roth
Attachments :	DSEIS_2684_Roth_Origional.pdf (7 kb)

IBR Draft SEIS - RECORD #2684 DETAIL

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Last Name : Roth
Business/Organization/Agency :

Submission Input :

First Name:
Gabrielle

Last Name:
Roth

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Topic Area:
Transportation

Comment:
This current design doesn't include improvements to existing cycling/pedestrian/non-car user infrastructure and will not help Portland meet our climate goals. In fact, it's likely to make pollution and gridlock worse - check out this article from Yale Climate Connections: https://yaleclimateconnections.org/2024/10/why-widening-highways-doesnt-reduce-traffic-congestion/

Choice quote: "We rearrange our travel patterns because of highway expansions, and the new driving that results is what we call induced travel. And research has shown that because of induced travel, congestion returns to previous levels about five to 10 years after the highway is widened."

Please come up with a different solution that doesn't contribute to further wrecking our climate and community,

Sincerely,
Gabrielle Roth

JCA comment #: 611

IBR Draft SEIS - RECORD #2685 DETAIL

First Name :	Nate
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Attachments :	DSEIS_2685_Butler_Origional.pdf (1 kb)

IBR Draft SEIS - RECORD #2685 DETAIL

Submission Date :	11/18/2024
First Name :	Nate
Last Name :	Butler
Business/Organization/Agency :	

Submission Input :

As a long-time resident of NE Portland and former commuter to downtown Vancouver, the current I5 bridge is completely and atrociously inadequate to transport people (by foot and bike). I, like many others I know, prefer not to be wasting away in single-occupant car traffic. Look to previous lane expansion projects, even to most of the highway infrastructure in Southern California to know that adding more lanes does not solve high traffic density. What does is giving people safe walking, biking (separated from walking), and rail infrastructure. If these modes are not the priority in the new design, then a new bridge is NOT worth it.

IBR Draft SEIS - RECORD #2686 DETAIL

First Name :	Stefan
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Attachments :	DSEIS_2686_Andersson_Origional.pdf (7 kb)

IBR Draft SEIS - RECORD #2686 DETAIL

Submission Date : 11/18/2024
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Last Name : Andersson
Business/Organization/Agency :

Submission Input :

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Last Name:
Andersson

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City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
Regarding the IBR Project advisory committee comment period, my comment pertains to concerns over capacity and operations for light rail operations between Portland and Vancouver. The current Yellow Line light rail runs only every 15 minutes and is heavily constrained by the lack of an operations and maintenance facility along with the slow street running segment on Interstate Avenue. Extending the Yellow Line to Vancouver without addressing these issues wouldn't result in a project that is effective at convincing people to ditch their cars. Operations improvements need to be made to allow for more trains to run faster at least between Vancouver and Interstate/Rose Quarter station and an operations and maintenance facility should be heavily considered to accommodate the increase in service.

JCA comment #: 610

IBR Draft SEIS - RECORD #2687 DETAIL

First Name :	Tamara
Last Name :	Penkert
Attachments :	DSEIS_2687_Penkert_Origional.pdf (1 kb)

IBR Draft SEIS - RECORD #2687 DETAIL

Submission Date :	11/18/2024
First Name :	Tamara
Last Name :	Penkert
Business/Organization/Agency :	Home Owner

Submission Input :

I believe that there should be a way for the public that use kayaks, canoes a way to access the water

IBR Draft SEIS - RECORD #2688 DETAIL

First Name :	Briana
Last Name :	Knez
Attachments :	DSEIS_2688_Knez_Origional.pdf (6 kb)

IBR Draft SEIS - RECORD #2688 DETAIL

Submission Date : 11/18/2024
First Name : Briana
Last Name : Knez
Business/Organization/Agency :

Submission Input :

First Name:
Briana

Last Name:
Knez

Email:
[redacted]

Topic Area:
Transportation

Comment:
I do not think that we should expand the freeway or add tolls. The root issue is a dependence on vehicle traffic when we should instead invest in transportation methods that are not car dependent.
Tolls disproportionately affect low-income communities, even with low-income discount programs. Expanding the bridge will also likely displace unhoused populations, and the money could be better spent on affordable housing solutions.

JCA comment #: 609

IBR Draft SEIS - RECORD #2689 DETAIL

First Name :	Robert
Last Name :	Duvoisin
Attachments :	DSEIS_2689_Duvoisin_Origional.pdf (8 kb)

IBR Draft SEIS - RECORD #2689 DETAIL

Submission Date : 11/18/2024
First Name : Robert
Last Name : Duvoisin
Business/Organization/Agency :

Submission Input :

First Name:
Robert

Last Name:
Duvoisin

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
To whom it may concern,
I just finished reading the Smart Mobility review of the Interstate Bridge Replacement Project DSEIS.
The review is easy-to-understand and thoroughly demonstrates that the IBR DSEIS is faulty. Among other points, average weekday bridge traffic is systematically lower than FEIS and DSEIS forecasts. Congestion on the bridge is limited to a few hours a day when commuters in single occupancy vehicles go to or come home from work. With the increase in work-from-home, the number of daily commuters is and will remain lower than forecast and this has not been accounted for. Congestion pricing on I5 and I205 bridges would provide an incentive for car pooling, displace traffic to times with available capacity, and possibly increase use of public transit. Reducing the number of on and off ramps, including those on Hayden Island, would enhance traffic

fluidity.
Thus, I-5 already has the capacity needed and the justification for this bridge- and freeway-widening project is defective and a wasteful use of limited transportation funds.
Please right-size this project. Replace the bridge with a structure which is more earthquake resilient, but do not increase its capacity.

JCA comment #: 608

IBR Draft SEIS - RECORD #2690 DETAIL

First Name :	Briana
Last Name :	Knez
Attachments :	DSEIS_2690_Knez_Origional.pdf (6 kb)

IBR Draft SEIS - RECORD #2690 DETAIL

Submission Date :	11/18/2024
First Name :	Briana
Last Name :	Knez
Business/Organization/Agency :	

Submission Input :

First Name:
Briana

Last Name:
Knez

Email:
[redacted]

Topic Area:
Transportation

Comment:
I am commenting on the IBR Draft SEIS because I am concerned about the displacement of ecosystems, businesses, and residents in the surrounding area. Instead of increasing lanes during the climate crisis, we should be investing in building infrastructure within walkable distances of people's homes, so that cars are not necessary to go to the doctor, get groceries, or other basic necessities. We should invest in making walking or biking a safe and pleasant experience without being surrounded by exhaust fumes and speeding cars.

JCA comment #: 607

IBR Draft SEIS - RECORD #2691 DETAIL

First Name :	Briana
Last Name :	Knez
Attachments :	DSEIS_2691_Knez_Origional.pdf (6 kb)

IBR Draft SEIS - RECORD #2691 DETAIL

Submission Date : 11/18/2024
First Name : Briana
Last Name : Knez
Business/Organization/Agency :

Submission Input :

First Name:
Briana

Last Name:
Knez

Email:
[redacted]

Topic Area:
Transportation

Comment:
I am commenting on the IBR Draft SEIS because I think this money would be better spent on affordable housing. Expanding lanes could potentially not even improve traffic, meanwhile it would increase traffic jams over the course of 4-10 years while construction is under way and displace existing houseless communities, residential communities, and businesses. What is more important, adding lanes to a bridge or making sure citizens have a roof over their head?

JCA comment #: 606

IBR Draft SEIS - RECORD #2692 DETAIL

First Name :	Joshua
Last Name :	Baker
Attachments :	DSEIS_2692_Baker_Origional.pdf (9 kb)

IBR Draft SEIS - RECORD #2692 DETAIL

Submission Date : 11/18/2024
First Name : Joshua
Last Name : Baker
Business/Organization/Agency :

Submission Input :

First Name:
Joshua

Last Name:
Baker

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Climate Change

Comment:
I am deeply concerned about the environmental consequences of the proposed design. Transportation is Oregon's largest source of climate pollution, and the Interstate Bridge Replacement project must prioritize reducing vehicle miles traveled (VMT) to align with our state and regional carbon reduction goals.
Climate action must be a top priority for Portland, where diverse communities are already feeling the impacts of a warming planet. The Pacific Northwest is not immune to climate change; in fact, I see its effects becoming

more severe every year. At work, I've had to help run cooling centers during extreme heat events to protect our community, particularly low-income and vulnerable residents. During smoke-filled summers, I've handed out masks and air filters to residents who otherwise wouldn't have access to clean air.

Personally, I've watched the forests I love to hike in burn, with trails closed and air quality too dangerous for outdoor adventures. These experiences are not just disruptions—they are wake-up calls.

The region must lead with bold action to reduce emissions and build resilience against these worsening conditions. This includes investing in sustainable infrastructure, expanding access to public transportation, and creating green spaces that help mitigate heat and improve air quality.

The current design projects a 62% increase in study-area VMT, which directly contradicts the climate objectives outlined in the project's own goals. This increase in auto travel will not only exacerbate greenhouse gas emissions but also heighten local air and water pollution, impacting communities along the corridor, particularly low-income residents who already face disproportionate health burdens.

To truly address these concerns, the project must provide robust alternatives to single-occupancy vehicle travel. Investments in world-class active transportation infrastructure—such as a seamless, protected multi-use path—coupled with enhanced public transit options, are essential. Additionally, I urge the project team to explore tolling structures that incentivize non-driving modes while providing equity-focused rebates for low-income commuters.

We cannot afford a design that locks us into decades of increased emissions and environmental degradation. I implore you to consider sustainable, multimodal options that prioritize environmental health and align with Oregon's climate goals.

IBR Draft SEIS - RECORD #2693 DETAIL

First Name :	Jeffrey
Last Name :	Weitzel
Attachments :	DSEIS_2693_Weitzel_Origional.pdf (9 kb)

IBR Draft SEIS - RECORD #2693 DETAIL

Submission Date : 11/18/2024
First Name : Jeffrey
Last Name : Weitzel
Business/Organization/Agency :

Submission Input :

First Name:
Jeffrey

Last Name:
Weitzel

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
I live in Portland and frequently visit Vancouver, and I prefer not to drive. The active transportation facilities described in the DSEIS leave much to be desired, in my opinion. Motor vehicles are clearly the star of the IBR show, while active transportation options and transit are bit players. This is the opposite of how it should be.

The fixed span options turn crossing the river into an arduous hill-climb for pedestrians and conventional cyclists, especially traveling from Vancouver to Portland. The proposal that pedestrians and cyclists must add an extra half mile to their trip in order to climb ten stories up a ramp to the shared use path on the bridge is thoroughly unserious. New facilities for active transportation should always make active transportation accessible to users of many different physical capabilities. This design fail that test. Only the most committed

active movers are going to walk or bike up that ramp.

The shared use path should be extended along the MAX tracks to Evergreen, which is it roughly the same elevation as the bridge at the waterfront. It is also more convenient to most destinations in Vancouver. For this and many other reasons, the shared use path should be adjacent to the MAX tracks instead of on an entirely different bridge. This gives active movers the option to reach the shared use path via the elevators or stairs at MAX stations. Easy access between the shared use path and MAX stations also facilitates multimodal journeys, which will become even more important if the MAX is extended further into Washington in the future. Finally, in the single deck configuration, positioning the MAX tracks between the roadway and the shared use path would lessen the noise and air quality impacts that users of the shared use path would experience due to roadway traffic.

On the Portland side, like many cyclists, I will travel to and from the new bridge via the Williams/Vancouver corridor. The IBR project would benefit from including an improved connection to these facilities to replace the current Rube Goldberg contraption of a bike route.

Active transportation and transit must not be second class citizens on the IBR. Single occupancy vehicles are a blight on our region, and it is a moral imperative that the IBR project offer excellent alternatives to driving between Oregon and Washington. Do better.

Thank you,

Jeff Weitzel
[redacted]

JCA comment #: 604

IBR Draft SEIS - RECORD #2694 DETAIL

First Name :	Joshua
Last Name :	Baker
Attachments :	DSEIS_2694_Baker_Origional.pdf (9 kb)

IBR Draft SEIS - RECORD #2694 DETAIL

Submission Date : 11/18/2024
First Name : Joshua
Last Name : Baker
Business/Organization/Agency :

Submission Input :

First Name:
Joshua

Last Name:
Baker

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
I strongly support improving and expanding active transportation infrastructure in Portland, particularly in areas like Northeast Portland, where many people rely on alternatives to cars. As someone who has been car-free for most of the past 15 years and experienced mobility challenges, I've personally navigated the city during a long recovery from foot surgery. This journey highlighted just how critical safe, accessible infrastructure is—not just for those of us managing temporary or permanent mobility issues, but for everyone, including older adults,

families, and individuals without access to a car.

While I've made significant progress in healing, I am acutely aware that my long-term mobility may change as I age. The prospect of a future with limited ability to navigate inaccessible or unsafe sidewalks, streets, and crossings concerns me. My hope is for Portland Metro, including Vancouver, to be a leader in equitable and inclusive transportation planning, ensuring all residents—regardless of physical ability—can access opportunities, resources, and connections across our city.

Investments in sidewalks, bike lanes, pedestrian crossings, and public transit are investments in equity and community well-being. I urge you to prioritize policies and projects that reflect these values.

With this project, I am particularly concerned that the current design creates significant barriers for active transportation users, especially those with mobility challenges.

One of the most glaring issues is the "Vancouver Dip," which forces users to navigate a 4.5% grade circular facility, adding unnecessary elevation and distance to the crossing. This design is not only inconvenient but also ableist, as it disproportionately affects people with disabilities and those unable to handle steep grades. A better solution would be a multi-use path that connects directly from Evergreen in Vancouver to the bridge's grade, providing a straightforward and accessible route.

Additionally, the placement of active transportation and transit facilities on opposite sides of the bridge creates further inefficiencies for multimodal users. Consolidating these facilities on the same side would allow seamless transitions between biking, walking, and public transit, while also enhancing safety and comfort through increased visibility and shared amenities like elevators.

Lastly, the multi-use path must include noise and debris shielding, ample lighting, and shading to ensure safety and usability year-round. These features are not optional but essential to making active transportation a viable and attractive alternative to driving.

Please prioritize inclusive and user-friendly design principles to ensure this bridge serves everyone equitably, from walkers and bikers to public transit users.

JCA comment #: 603

IBR Draft SEIS - RECORD #2695 DETAIL

First Name :	David
Last Name :	Goodyke
Attachments :	DSEIS_2695_Goodyke_Origional.pdf (8 kb)

IBR Draft SEIS - RECORD #2695 DETAIL

Submission Date : 11/18/2024
First Name : David
Last Name : Goodyke
Business/Organization/Agency :

Submission Input :

First Name:
David

Last Name:
Goodyke

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Climate Change

Comment:
Please go back to the drawing board. This NOT a 21st century bridge. The proposed bridge is way too wide with excesdive driving lanes which will soon fill due to induced demand. The bridge is too tall making it hard to walk or bike over and negatively impacting both waterfronts, especially Vancouvers. It will also impact the airport. It is also too low and will impact and permanently limit industry. You could include a submerged tunnel or include a lift. Focus on transit and bikes and future flexibility for river travel

JCA comment #: 602

IBR Draft SEIS - RECORD #2696 DETAIL

First Name :	Susan
Last Name :	Staehli
Attachments :	DSEIS_2696_Staehli_Origional.pdf (8 kb)

IBR Draft SEIS - RECORD #2696 DETAIL

Submission Date : 11/18/2024
First Name : Susan
Last Name : Staehli
Business/Organization/Agency :

Submission Input :

First Name:
Susan

Last Name:
Staehli

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
Please plan for the future, and ensure maximum safety and efficiency for all travelers, especially those on foot or otherwise exposed to the elements and traffic hazards. I agree with all these points:
Marry transit and active transportation on the same side of the bridge: Current design has the multi-use path on one side of the bridge and transit on the other, about 200 feet apart. We know multimodal trips are key for pedestrians and putting these transportation options side-by-side reduces out of direction travel, eases

transfers, and has a number of additional benefits. The multi-use path should be next to the MAX line, not on opposite sides of the bridge as it is currently designed.
Address the current design that excludes pedestrians and people with mobility challenges: Current design does not have elevators to the multi-use path. On the Vancouver waterfront, the multi-use path is approximately 100' in the air and requires a 1/2 mile long, 4.5% grade spiral ramp, and no elevator is available. This is ableist in design and due to the elevation and distance it excludes most pedestrians and folks with mobility challenges. The multi-use path needs to be lower or, at a minimum, have elevators available.
Extend the multi-use path north into Vancouver: Current design has the multi-use path ending at the Vancouver waterfront where it descends a 1/2 mile spiral ramp at 4.5% grade. We believe the path must be extended to Evergreen Boulevard (site of the Vancouver library) along the transit line so pedestrians do not face 1/2 mile out of direction travel where they lose and must regain all the elevation. This extension also more effectively connects into the rest of the active transportation network throughout Vancouver.
Implement robust safety measures: For people to use active transportation, they must feel safe. We are asking for lighting throughout the multi-use path, separation from freeway traffic by placing the transit line between the multi-use path and the roadway, and building/planting natural and human-made shade.
Thank you for considering people friendly options.

JCA comment #: 601

IBR Draft SEIS - RECORD #2697 DETAIL

First Name :	Lauren
Last Name :	Colas
Attachments :	DSEIS_2697_Colas_Origional.pdf (7 kb)

IBR Draft SEIS - RECORD #2697 DETAIL

Submission Date : 11/18/2024
First Name : Lauren
Last Name : Colas
Business/Organization/Agency :

Submission Input :

Hello:

I would like to make comments on the proposed I-5 bridge.

*

Why in the world would you push a three-lane bridge to replace another three-lane bridge plus light rail that Clark County voters have voted DOWN three times in years past? The traffic problem will still remain the same, and the light rail will bring crime, drugs, more homeless people to SW Washington, which we DO NOT WANT. We don't want light rail, and we don't want tolling. What we want is additional lanes, as well as a third bridge to reduce to freight-related traffic!!

*

Why would you push a bridge that is not tall enough for the Corps of Engineers to approve? What a waste of money if they won't approve.

*

If Oregon adds tolls to the bridge, this will eliminate the millions and millions of dollars that is spent in Oregon by Washington residents. They will never want to go over to Oregon to shop or do anything because the tolling will be so astronomic, that no one will want to travel there or work there. I don't know anyone who can afford spending $2,000 per year out of their salary or hourly wages to afford tolling. This is nothing but a regressive tax on low-income people.egon adds tolls to the bridge, this will eliminate the millions and millions of dollars that is spent in Oregon by Washington residents. They will never want to go over to Oregon to shop or do anything because the tolling will be so astronomic, that no one will want to travel there or work there. I don't know anyone who can afford spending $2,000 per year out of their salary or hourly wages to afford tolling. This is nothing but a regressive tax on low-income people.

*

The replacement costs are astronomical — $9 billion anticipated in 2025 - and light rail is generally avoided at all costs. Why would you continue to waste taxpayer dollars - this is completely asinine. Even the MAX light rail vehicles cost is the most expensive in the world.

*

This project should be ditched altogether. Retrofit the I-5 bridge and build a third bridge to reduce traffic. And don't do tolling either!

Lauren Colas

IBR Draft SEIS - RECORD #2698 DETAIL

First Name :	Jeffrey
Last Name :	Weitzel
Attachments :	DSEIS_2698_Weitzel_Origional.pdf (9 kb)

IBR Draft SEIS - RECORD #2698 DETAIL

Submission Date : 11/18/2024
First Name : Jeffrey
Last Name : Weitzel
Business/Organization/Agency :

Submission Input :

First Name:
Jeffrey

Last Name:
Weitzel

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
The bridge replacement described in the Draft SEIS is the wrong bridge. It has too many cars crossing it in too many lanes. Norman Marshall of Smart Mobility, in a report commissioned by the Just Crossing Alliance, finds that DSEIS uses traffic projections so flawed as to be "useless", and also suggests that the true sources of congestion on the I-5 Columbia River crossing will not be addressed by the IBR project because they are traffic bottlenecks outside of the project's geographic extent. Are we about to spend billions of extra dollars on this

project just to fail solve the wrong problems?

It's wrong problems all the way down. Designing this bridge to accommodate a modeled traffic projection was fundamentally misguided from the start. The City of Portland and other IBR agency partners have statutory goals to dramatically reduce the share of automobiles in their transportation mixes, and with good reason. Single occupancy vehicles clog our roads, poison our air, and use up valuable land for their storage. The IBR should be sized for the number of automobile crossings we want for our region, not the number we would expect if our regional governments did nothing to change our transportation mix.

So START OVER. Shake off the car-brain group-think. Convene a region-wide planning process to shift as many car trips to other more sustainable modes as possible, especially over the Columbia River. When this bridge is finally built, the best way for people to cross it should be on a train, a bus, a bicycle or personal mobility device, or on foot.

Let's build a right-sized bridge that supports a sustainable and equitable future for our region, not one that reinforces the outdated and harmful hegemony of the single occupancy vehicle.

Thank you,

Jeff Weitzel
[redacted]

JCA comment #: 600

IBR Draft SEIS - RECORD #2699 DETAIL

First Name :	Monie
Last Name :	Holmes
Attachments :	DSEIS_2699__Holmes_Origional.pdf (7 kb)

IBR Draft SEIS - RECORD #2699 DETAIL

Submission Date : 11/18/2024
First Name : Monie
Last Name : Holmes
Business/Organization/Agency :

Submission Input :

First Name:
Monie

Last Name:
Holmes

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
The I5 bridge can be repaired for a lot less money than the planned replacement project. Use the funds to add a third bridge so perhaps WA residents can commute to Hillsboro or travelers can completely bypass the downtown area. This will alleviate so much traffic on 1-5 thru Portland. there are better, more cost effective ways to solve the problems.

JCA comment #: 599

IBR Draft SEIS - RECORD #2700 DETAIL

First Name :	Sean
Last Name :	Sweat
Attachments :	DSEIS_2700_Sweat_Origional.pdf (7 kb)

IBR Draft SEIS - RECORD #2700 DETAIL

Submission Date : 11/18/2024
First Name : Sean
Last Name : Sweat
Business/Organization/Agency :

Submission Input :

First Name:
Sean

Last Name:
Sweat

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
The level of malfeasance in the analysis used for project justification is abhorrent. Stop trying to build more highway capacity and more on-ramps -- that is not what we or the world needs right now. Just add light rail, make it earthquake resistant, and call it a day. Stop wasting our money.

JCA comment #: 598

IBR Draft SEIS - RECORD #2701 DETAIL

First Name :	Robert
Last Name :	Hemphill
Attachments :	DSEIS_2701_Hemphill_Origional.pdf (7 kb)

IBR Draft SEIS - RECORD #2701 DETAIL

Submission Date : 11/18/2024
First Name : Robert
Last Name : Hemphill
Business/Organization/Agency :

Submission Input :

First Name:
Robert

Last Name:
Hemphill

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
I support the Just Crossing Alliance letter. Please rightsize the project.

JCA comment #: 597

IBR Draft SEIS - RECORD #2702 DETAIL

First Name :	Suzanne
Last Name :	Bishop
Attachments :	DSEIS_2702_Bishop_Origional.pdf (8 kb)

IBR Draft SEIS - RECORD #2702 DETAIL

Submission Date : 11/18/2024
First Name : Suzanne
Last Name : Bishop
Business/Organization/Agency :

Submission Input :

First Name:
Suzanne

Last Name:
Bishop

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
I am loosely following the design of the new Interstate bridge. I plan to ride Max to the bridge station and take the elevator down to street level. Don't understand why bikes are on one side of the bridge and light rail on the other.
I will NOT be using that ramp.
Thank you for your work on this project!

JCA comment #: 596

IBR Draft SEIS - RECORD #2703 DETAIL

First Name :	Earl
Last Name :	Richardson
Attachments :	DSEIS_2703_Richardson_Origional.pdf (9 kb)

IBR Draft SEIS - RECORD #2703 DETAIL

Submission Date : 11/18/2024
First Name : Earl
Last Name : Richardson
Business/Organization/Agency :

Submission Input :

First Name:
Earl

Last Name:
Richardson

Business or Organization:
[redacted]

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
1. The $7-12 billion cost is outrageous, while doing little to solve I-5 traffic congestion at the I-5 bridge.

2. The massive bridge will inevitably experience massive cost overruns, causing a redirection of funding meant for social programs.
3. Bridge tolls will impose a heavy and daily financial burden on all adjacent communities.
4. IBR's fixed-spans offer only 116 feet of vertical clearance above water, a full 62 ft less than today's drawbridge which will significantly restrict larger commercial vessels from using the Columbia River to support upstream communities.
5. The 175 ft bridge height will be an eyesore that will detract from the current scenic beauty of the crossing.
6. Per the committee, IBR bridge plans will not be engineered to withstand a major Cascade Seduction Zone earthquake! Scientists are currently predicting there is about a 37% chance that a mega-thrust earthquake in this fault zone will occur in the next 50 years.
7. The IBR is an area where ground liquefaction is "expected" during a major earthquake. Liquefaction is a major threat to any bridge.
8. The Delta Park 30ft high 1/4 mile corkscrew bike & pedestrian access ramp, is too long & steep for the general public.
9. At 100ft above ground, the Vancouver transit station will be a long reach as elevator outages do happen.
10. At 30ft above ground, the Hayden Island transit station will also be a long reach subject to periodic elevator outages.
11. The 18-lane interchange planned for Hayden Island will create a very wide ugly swath of multiple pavement lanes across prime retail property, and a navigational nightmare for the visiting public and islanders.
12. The bridge's 15-year construction period will create a huge loss of quality of life, income, & property values for Hayden Island and adjacent communities.
13. Insist on an additional 120 days for public review & comment, given IBR's refusal to release full bridge information.
14. An "Independent Engineering Commission" should investigate & evaluate the option of more suitable, far less costly, and considerably more environmentally friendly "Immersed Tunnel!" If it was selected for a similar project in Vancouver BC, then why not here?

We're all for a bridge replacement, but not t

JCA comment #: 595

IBR Draft SEIS - RECORD #2704 DETAIL

First Name :	Sean
Last Name :	Sweat
Attachments :	DSEIS_2704_Sweat_Origional.pdf (7 kb)

IBR Draft SEIS - RECORD #2704 DETAIL

Submission Date : 11/18/2024
First Name : Sean
Last Name : Sweat
Business/Organization/Agency :

Submission Input :

First Name:
Sean

Last Name:
Sweat

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
The level of malfeasance in the analysis used for project justification is abhorrent. Stop trying to build more highway capacity and more on-ramps -- that is not what we or the world needs right now. Just add light rail, make it earthquake resistant, and call it a day. Stop wasting our money.

JCA comment #: 594

IBR Draft SEIS - RECORD #2705 DETAIL

First Name :	Roger
Last Name :	Martin
Attachments :	DSEIS_2705_Martin_Origional.pdf (7 kb)

IBR Draft SEIS - RECORD #2705 DETAIL

Submission Date : 11/18/2024
First Name : Roger
Last Name : Martin
Business/Organization/Agency :

Submission Input :

First Name:
Roger

Last Name:
Martin

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
As a long time bicyclist pushing 80 years old, I was concerned when I read the new Interstate Bridge will be accessible by bicycle on the Vancouver via a 1/2mile circular ramp that will go up over 100 feet. This is going to be difficult to some folks on bicycles and pedestrians . It is also my understanding that rapid transit users will have an elevator available to them on the other Vancouver side. Why not make it possible for bike riders to use this elevator?

JCA comment #: 593

IBR Draft SEIS - RECORD #2706 DETAIL

First Name :	Richard
Last Name :	Sorem
Attachments :	DSEIS_2706_Sorem_Origional.pdf (7 kb)

IBR Draft SEIS - RECORD #2706 DETAIL

Submission Date : 11/18/2024
First Name : Richard
Last Name : Sorem
Business/Organization/Agency :

Submission Input :

IBR Community Member,

I am writing you this email to express several concerns that we have concerning the construction of the I5 Bridge going over the North Portland Channel.

My wife and I live at Jantzen Beach Moorage and own a floating home at the end of B Row. We along with our neighbors have studied the mapping of the proposed bridge and noticed several inconsistencies. There is a list of our concerns highlighted below.

1. The overhead that shows JBMI's footprint is inaccurate. The east end of our moorage is 50 feet from the current bridge. Your map shows a much larger open area. When the construction of the bridge does happen the staging area will encompass at least 3rows of JBMI. (Rows A - C).
2. The land staging of equipment on the east end during construction will greatly impact the moorage with loss of entrance and parking spaces for many years.
3. The estimate of the number of homes that will be :"taken" is very conservative and the actual number would be all of A row and B rows. C Row would need to be temporarily moved during construction.
4. The loss of income and infrastructure to JBMI would be considerable.
5. The construction estimate on the length of time is estimated between 3 - 5 years. This time estimate will devastate the island community.
6. The environmental impact in the North Channel will change the current flow and increase the river bank erosion that runs the entire length of our community. Are there plans to construct a wing dam on the east end of our moorage. Are you aware of any impact that the bridge supports will be on the depth of the channel.

Your committee needs to reevaluate the design of the bridge, the impact directly to our community and the financial impact not only to our community by Hayden Island in general.

Respectfully,
Richard & Ginny Sorem
[redacted]

IBR Draft SEIS - RECORD #2707 DETAIL

First Name :	Judith
Last Name :	La Scola
Attachments :	DSEIS_2707_LaScola_Original.pdf (17 kb)

IBR Draft SEIS - RECORD #2707 DETAIL

Submission Date :	11/18/2024
First Name :	Judith
Last Name :	La Scola
Business/Organization/Agency :	WHIMOA
Attachments :	DSEIS_2707_LaScola_Original.pdf (13 kb)

Submission Input :

First Name:
Judith

Last Name:
La Scola

Business or Organization:
WHIMOA

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
I am firmly against the I-5 replacement bridge project. I do not feel it will advantage us in any way and feel strongly against this project.
Again I firmly oppose this massive $7-$12 billion dollar toll bridge that the Interstate Bridge Replacement Project (IBRP) is proposing for the new I-5 Bridge between Vancouver WA and Portland OR. The bridge they are proposing will take 15-years to build, will not be seismically sound to handle a major Cascade Seduction Zone earthquake, and will do little to ease traffic congestion on the bridge. The giant bridge and its excessive tolls will affect everyone transiting that I-5 bridge. The funds could be used to strengthen our community as a whole at a time it is truly in need.

JCA comment #: 592

Judith

La Scola

Business or Organization:

WHIMOA

Topic Area:

Transportation

Comment:

I am firmly against the I-5 replacement bridge project. I do not feel it will advantage us in any way and feel strongly against this project.

Again I firmly oppose this massive $7-$12 billion dollar toll bridge that the Interstate Bridge Replacement Project (IBRP) is proposing for the new I-5 Bridge between Vancouver WA and Portland OR. The bridge they are proposing will take 15-years to build, will not be seismically sound to handle a major Cascade Seduction Zone earthquake, and will do little to ease traffic congestion on the bridge. The giant bridge and its excessive tolls will affect everyone transiting that I-5 bridge. The funds could be used to strengthen our community as a whole at a time it is truly in need.

JCA comment #: 592

IBR Draft SEIS - RECORD #2708 DETAIL

First Name :	David
Last Name :	Fredrickson, AIA, (ret.)
Attachments :	DSEIS_2708_Fredrickson_Original.pdf (17 kb)

IBR Draft SEIS - RECORD #2708 DETAIL

Submission Date :	11/18/2024
First Name :	David
Last Name :	Fredrickson, AIA, (ret.)
Business/Organization/Agency :	
Attachments :	DSEIS_2708_Fredrickson_Original.pdf (13 kb)

Submission Input :

First Name:
David

Last Name:
Fredrickson, AIA, (ret.)

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Visual Quality

Comment:
Pass the question by Santiago Calatrava whose office is in Switzerland, (just send him a letter of inquiry and see if he responds.) All of the 'designs' I saw in the Oregonian are just pathetic, (current 'bridge fashion' thinking.) If we are going to spend resources to replace this very old bridge, we need to replace it w/ something

we can be proud of and, not just for now, but for generations to come. Complaints about design after the build are pointless. His design for the Peace Bridge in Calgary, Canada is just one example of 'thinking new'. What we really don't need is 'group think rabbit hole' of just engineering and cost. BEAUTY, must be a factor, think Paris, France. Why does everyone say it is such a beautiful city? Thanks, I hope someone is listening.

JCA comment #: 591

David

Fredrickson, AIA, (ret.)

Topic Area:

Visual Quality

Comment:

Pass the question by Santiago Calatrava whose office is in Switzerland, (just send him a letter of inquiry and see if he responds.) All of the 'designs' I saw in the Oregonian are just pathetic, (current 'bridge fashion' thinking.) If we are going to spend resources to replace this very old bridge, we need to replace it w/ something we can be proud of and, not just for now, but for generations to come. Complaints about design after the build are pointless. His design for the Peace Bridge in Calgary, Canada is just one example of 'thinking new'. What we really don't need is 'group think rabbit hole' of just engineering and cost. BEAUTY, must be a factor, think Paris, France. Why does everyone say it is such a beautiful city? Thanks, I hope someone is listening.

JCA comment #: 591

IBR Draft SEIS - RECORD #2709 DETAIL

First Name :	Stephen
Last Name :	Johnson
Attachments :	DSEIS_2709_Johnson_Original.pdf (64 kb)

IBR Draft SEIS - RECORD #2709 DETAIL

Submission Date : 11/18/2024
First Name : Stephen
Last Name : Johnson
Business/Organization/Agency :
Attachments : DSEIS_2709_Johnson_Original.pdf (11 kb)

Submission Input :

First Name:
Stephen

Last Name:
Johnson

Business or Organization:
Retired

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
Stations should be built to support four-car trains now to align with future downtown transit tunnel upgrades. Plan for even higher capacity transit systems, such as multi-lane Bus Rapid Transit (BRT) or heavy rail, beyond the 2045 Environmental Impact Statement (EIS) horizon. We must ensure today's infrastructure can adapt to

tomorrow’s needs.
Induced Demand Consideration: Traffic modeling must realistically account for induced demand to ensure accurate projections for transit and road use.

JCA comment #: 590

Stephen

Johnson

Topic Area:

Transportation

Comment:

Stations should be built to support four-car trains now to align with future downtown transit tunnel upgrades.

Plan for even higher capacity transit systems, such as multi-lane Bus Rapid Transit (BRT) or heavy rail, beyond the 2045 Environmental Impact Statement (EIS) horizon. We must ensure today's infrastructure can adapt to tomorrow's needs.

Induced Demand Consideration: Traffic modeling must realistically account for induced demand to ensure accurate projections for transit and road use.

JCA comment #: 590

IBR Draft SEIS - RECORD #2710 DETAIL

First Name :	Lidwien
Last Name :	Rahman
Attachments :	DSEIS_2710_Rahman_Original.pdf (22 kb)

IBR Draft SEIS - RECORD #2710 DETAIL

Submission Date :	11/18/2024
First Name :	Lidwien
Last Name :	Rahman
Business/Organization/Agency :	
Attachments :	DSEIS_2710_Rahman_Original.pdf (17 kb)

Submission Input :

First Name:
Lidwien

Last Name:
Rahman

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
As a lifelong walker and bicyclist, I have ridden the current I-5 and I-205 bridges across the Columbia River, although I cannot say I enjoy the experience of being on and getting to and from the bridges. I fervently hoped the new IBR project would be a significant improvement. Now that I'm older (about to turn 70) I find myself more concerned about personal safety and comfort, about elevation gain, about wayfinding, about rain, sun and darkness, and about the ability to find a bathroom and a place to sit and rest a bit. I have the following comments on modified LPA as described in the active transportation section of the Transportation Technical Report:

1. While I appreciate the separation between the proposed multi-use path (MUP) and fast moving traffic, along with the noise, debris, and air pollution it generates, I am concerned about personal safety and comfort and emergency access. How will emergency responders be able to access the MUP? How will users be protected from the heat in summer and the rain in winter? The bridge is a very long span to be out in the elements. On city streets I can duck under a tree or in the shade of a building. Will the MUP and the connections to it be adequately lit?
2. How will the agencies prevent homeless people from settling on the bridge and under the underpasses leading to the bridge? I have stopped riding the I-205 path and Springwater Corridor by myself because of aggressive behavior by and debris left by homeless people. Just yesterday I participated in a SOLVE cleanup along the I-205 path. How will the IBR path be kept free of homeless people and their stuff?
3. Access to and from the transit stations relies heavily on elevators. My experience with the elevator e.g. at the Hollywood station is that it is out of order more often than not. Same with the elevators at the Bob Stacey Crossing in SE Portland. When I had a hip replacement operation a few years ago I had to rely heavily on elevator access to transit. Obviously many disabled people face that issue all the time. It is crucial that there be redundancy in elevators, that they be of the very best quality, and that they be very well maintained.
4. All transit stations should have bathrooms and well lit places to sit in the shade and out of the rain. Getting old is plenty undignified as it is. Many older people can no longer drive and must rely on transit. It is an unfortunate fact of life that older people have to go to the bathroom and take a rest more often.
5. There should also be elevator access to the multi-use path, especially on the Vancouver side, to allow the disabled and pedestrians to avoid the long steep spiral. One way to efficiently accomplish that is to have the MUP on the same side as transit.

Thank you for this opportunity to comment.

JCA comment #: 589

Lidwien

Rahman

Topic Area:

Transportation

Comment:

As a lifelong walker and bicyclist, I have ridden the current I-5 and I-205 bridges across the Columbia River, although I cannot say I enjoy the experience of being on and getting to and from the bridges. I fervently hoped the new IBR project would be a significant improvement. Now that I'm older (about to turn 70) I find myself more concerned about personal safety and comfort, about elevation gain, about wayfinding, about rain, sun and darkness, and about the ability to find a bathroom and a place to sit and rest a bit. I have the following comments on modified LPA as described in the active transportation section of the Transportation Technical Report:

1. While I appreciate the separation between the proposed multi-use path (MUP) and fast moving traffic, along with the noise, debris, and air pollution it generates, I am concerned about personal safety and comfort and emergency access. How will emergency responders be able to access the MUP? How will users be protected from the heat in summer and the rain in winter? The bridge is a very long span to be out in the elements. On city streets I can duck under a tree or in the shade of a building. Will the MUP and the connections to it be adequately lit?

2. How will the agencies prevent homeless people from settling on the bridge and under the underpasses leading to the bridge? I have stopped riding the I-205 path and Springwater Corridor by myself because of aggressive behavior by and debris left by homeless people. Just yesterday I participated in a SOLVE cleanup along the I-205 path. How will the IBR path be kept free of homeless people and their stuff?

3. Access to and from the transit stations relies heavily on elevators. My experience with the elevator e.g. at the Hollywood station is that it is out of order more often than not. Same with the elevators at the Bob Stacey Crossing in SE Portland. When I had a hip replacement operation a few years ago I had to rely heavily on elevator access to transit. Obviously many disabled people face that issue all the time. It is crucial that there be redundancy in elevators, that they be of the very best quality, and that they be very well maintained.

4. All transit stations should have bathrooms and well lit places to sit in the shade and out of the rain. Getting old is plenty undignified as it is. Many older people can no longer drive and must rely on transit. It is an unfortunate fact of life that older people have to go to the bathroom and take a rest more often.

5. There should also be elevator access to the multi-use path, especially on the Vancouver side, to allow the disabled and pedestrians to avoid the long steep spiral. One way to efficiently accomplish that is to have the MUP on the same side as transit.

Thank you for this opportunity to comment.

JCA comment #: 589

IBR Draft SEIS - RECORD #2711 DETAIL

First Name :	Victoria
Last Name :	Via
Attachments :	DSEIS_2711_Via_Original.pdf (13 kb)

IBR Draft SEIS - RECORD #2711 DETAIL

Submission Date :	11/18/2024
First Name :	Victoria
Last Name :	Via
Business/Organization/Agency :	
Attachments :	DSEIS_2711_Via_Original.pdf (11 kb)

Submission Input :

First Name:
Victoria

Last Name:
Via

Email:
[redacted]

Topic Area:
Acquisitions and Displacement

Comment:
This project includes excessive freeway expansion at the great expense of neighboring communities. My elderly relative lives just a block away from the proposed project area, and I am very concerned about the impacts on her. I am worried about her potentially being displaced, or if not, having to deal with more air and noise pollution. She lives in a low-income senior housing, along with dozens of other low-income seniors. Please rightsizing the project.

JCA comment #: 588

Victoria

Via

Topic Area:

Acquisitions and Displacement

Comment:

This project includes excessive freeway expansion at the great expense of neighboring communities. My elderly relative lives just a block away from the proposed project area, and I am very concerned about the impacts on her. I am worried about her potentially being displaced, or if not, having to deal with more air and noise pollution. She lives in a low-income senior housing, along with dozens of other low-income seniors. Please rightsizing the project.

JCA comment #: 588

IBR Draft SEIS - RECORD #2712 DETAIL

First Name :	Robert
Last Name :	Rose
Attachments :	DSEIS_2712_Rose_Original.pdf (29 kb)

IBR Draft SEIS - RECORD #2712 DETAIL

Submission Date :	11/18/2024
First Name :	Robert
Last Name :	Rose
Business/Organization/Agency :	
Attachments :	DSEIS_2712_Rose_Original.pdf (30 kb)

Submission Input :

First Name:
Robert

Last Name:
Rose

Business or Organization:
Taxpayer

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
Regarding the Interstate Bridge Replacement, I am opposed to any auxiliary car traffic lanes, especially on the Oregon side, but also on the Washington side. This crossing should provide excellent infrastructure for transit, especially rail transit, bikes, and pedestrians. It should encourage use of these modes in crossings generally and should not promote car traffic by the inclusion of auxiliary lanes. The latter will simply increase congestion, air pollution, and carbon pollution in the surround neighborhoods.

JCA comment #: 587

Robert

Rose

Topic Area:

Transportation

Comment:

Regarding the Interstate Bridge Replacement, I am opposed to any auxiliary car traffic lanes, especially on the Oregon side, but also on the Washington side. This crossing should provide excellent infrastructure for transit, especially rail transit, bikes, and pedestrians. It should encourage use of these modes in crossings generally and should not promote car traffic by the inclusion of auxiliary lanes. The latter will simply increase congestion, air pollution, and carbon pollution in the surround neighborhoods.

JCA comment #: 587

IBR Draft SEIS - RECORD #2713 DETAIL

First Name :	Victoria
Last Name :	Via
Attachments :	DSEIS_2713_Via_Original.pdf (12 kb)

IBR Draft SEIS - RECORD #2713 DETAIL

Submission Date :	11/18/2024
First Name :	Victoria
Last Name :	Via
Business/Organization/Agency :	
Attachments :	DSEIS_2713_Via_Original.pdf (10 kb)

Submission Input :

First Name:
Victoria

Last Name:
Via

Email:
[redacted]

Topic Area:
Transportation

Comment:
Please consider locating the multimodal path directly adjacent to transit connections. Please also consider extending the path to Evergreen; the 100 foot tall spiral as currently proposed would be difficult or infeasible for many users to use.

JCA comment #: 586

Victoria

Via

Topic Area:

Transportation

Comment:

Please consider locating the multimodal path directly adjacent to transit connections. Please also consider extending the path to Evergreen; the 100 foot tall spiral as currently proposed would be difficult or infeasible for many users to use.

JCA comment #: 586

IBR Draft SEIS - RECORD #2714 DETAIL

First Name :	Eric
Last Name :	Tschuy
Attachments :	DSEIS_2714_Tschuy_Original.pdf (15 kb)

IBR Draft SEIS - RECORD #2714 DETAIL

Submission Date :	11/17/2024
First Name :	Eric
Last Name :	Tschuy
Business/Organization/Agency :	
Attachments :	DSEIS_2714_Tschuy_Original.pdf (11 kb)

Submission Input :

First Name:
Eric

Last Name:
Tschuy

Business or Organization:
Retired from Mt Hood Community College

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
I'm making CAC, please remember safety concerns and people with disabilities. For best access and safety, place multi-use path next to MAX, on river side and put in lighting. An elevator is needed at Vancouver waterfront for wheelchair access (a 1/2 mile, steep access ramp is not acceptable). Best option for access: extend multi-use path into downtown Vancouver so path connects smoothly and safely to city ped and bicycle grid. This also makes a steep access ramp less necessary. A ped and cycle centered experience will really put Vancouver on the map and make for a much better connector. . Thank you!

JCA comment #: 585

Eric

Tschuy

Topic Area:

Transportation

Comment:

I'm making CAC, please remember safety concerns and people with disabilities. For best access and safety, place multi-use path next to MAX, on river side and put in lighting. An elevator is needed at Vancouver waterfront for wheelchair access (a 1/2 mile, steep access ramp is not acceptable). Best option for access: extend multi-use path into downtown Vancouver so path connects smoothly and safely to city ped and bicycle grid. This also makes a steep access ramp less necessary. A ped and cycle centered experience will really put Vancouver on the map and make for a much better connector. . Thank you!

JCA comment #: 585

IBR Draft SEIS - RECORD #2715 DETAIL

First Name :	Becky
Last Name :	Hawkins
Attachments :	DSEIS_2715_Hawkins_Original.pdf (16 kb)

IBR Draft SEIS - RECORD #2715 DETAIL

Submission Date :	11/17/2024
First Name :	Becky
Last Name :	Hawkins
Business/Organization/Agency :	
Attachments :	DSEIS_2715_Hawkins_Original.pdf (13 kb)

Submission Input :

First Name:
Becky

Last Name:
Hawkins

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Topic Area:
Climate Change

Comment:
Please design the bridge for convenient, safe public transit and active transportation. Today's kids have never known a summer in WA/OR without wildfire smoke and 100-degree heat. They're inheriting a climate that is less livable every year. Yet parents are told that for their children's safety, they have to drive their family everywhere, preferably in the biggest vehicle they can afford, which adds incrementally to climate change. We need to build infrastructure that gives everyone safe and reasonable alternatives to driving.

Transit and multi-use paths should not be an afterthought, nor should they be designed solely for athletes and daredevils. One design element will ensure that these components of the river crossing are widely usable and therefore a worthwhile investment. Transit and the multi-use path should be next to each other. This makes it easy to transfer from one travel mode to the other, enabling people to travel farther and more conveniently without a car. This also makes the transit elevators accessible to path users. The transit lanes can act as

buffers between the multi-use path and vehicle lanes, which reduces noise, debris, and danger on the path. This design makes the path available to cyclists of all experience levels, which is vital for getting people out of cars and reducing fossil fuel emissions. If we want to have a livable climate in the future, IBR has to prioritize active transit and public transportation now.

JCA comment #: 584

Becky

Hawkins

Topic Area:

Climate Change

Comment:

Please design the bridge for convenient, safe public transit and active transportation. Today's kids have never known a summer in WA/OR without wildfire smoke and 100-degree heat. They're inheriting a climate that is less livable every year. Yet parents are told that for their children's safety, they have to drive their family everywhere, preferably in the biggest vehicle they can afford, which adds incrementally to climate change. We need to build infrastructure that gives everyone safe and reasonable alternatives to driving.

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JCA comment #: 584

IBR Draft SEIS - RECORD #2716 DETAIL

First Name :	Pauly
Last Name :	Tarricone
Attachments :	DSEIS_2716_Tarricone_Original.pdf (15 kb)

IBR Draft SEIS - RECORD #2716 DETAIL

Submission Date :	11/17/2024
First Name :	Pauly
Last Name :	Tarricone
Business/Organization/Agency :	
Attachments :	DSEIS_2716_Tarricone_Original.pdf (13 kb)

Submission Input :

First Name:
Pauly

Last Name:
Tarricone

Email:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
The current design for the replacement I-5 bridge between Portland, OR and Vancouver, WA is way too over-engineered for cars. For the amount of resources being requested to construct it, this design should reflect a sustainable future: one that delivers high quality transit and multi-modal connections on the corridor. The current design does not deliver that. Car traffic is the most demanding, least efficient, most costly, and most dangerous means of travel. This bridge replacement is an opportunity to correct transportation mistakes of the past, rather than double down on them. Last, the long term of bill of maintaining this infrastructure will be most costly if it's focused on cars. We can't guarantee that funding will be easily accessible in the future. Please revisit the drawing board by REDUCING CAR CAPACITY and INCREASING RAIL AND BIKE INFRASTRUCTURE. Thank you.

JCA comment #: 583

Pauly

Tarricone

Topic Area:

Transportation

Comment:

The current design for the replacement I-5 bridge between Portland, OR and Vancouver, WA is way too over-engineered for cars. For the amount of resources being requested to construct it, this design should reflect a sustainable future: one that delivers high quality transit and multi-modal connections on the corridor. The current design does not deliver that. Car traffic is the most demanding, least efficient, most costly, and most dangerous means of travel. This bridge replacement is an opportunity to correct transportation mistakes of the past, rather than double down on them. Last, the long term of bill of maintaining this infrastructure will be most costly if it's focused on cars. We can't guarantee that funding will be easily accessible in the future. Please revisit the drawing board by REDUCING CAR CAPACITY and INCREASING RAIL AND BIKE INFRASTRUCTURE. Thank you.

JCA comment #: 583

IBR Draft SEIS - RECORD #2717 DETAIL

First Name :	Robert
Last Name :	Kutter
Attachments :	DSEIS_2717_Kutter_Original.pdf (15 kb)

IBR Draft SEIS - RECORD #2717 DETAIL

Submission Date :	11/17/2024
First Name :	Robert
Last Name :	Kutter
Business/Organization/Agency :	
Attachments :	DSEIS_2717_Kutter_Original.pdf (12 kb)

Submission Input :

First Name:
Robert

Last Name:
Kutter

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Other

Comment:
As someone that has lost a family member to traffic violence, know that the choices you make in the design and implementation of this project can a will cost vulnerable road user their lives. Think about your friends and family using the active and public transportation options that will be created as part of this project would they

want to use the facilities that you are designing? Not just as a recreational activity but as their primary mode of transportation.

As we all know, and has been thoroughly studied, the addition of lanes will not ease or reduce road use in the long run. This project with a 50+ year lifespan needs to not only meet the requirements of today but the transportation needs of the future. Remember that induced demand will not only drive the additional vehicle use and sprawl of the metro, but the non-car facilities will induce demand along the route for all other forms of transit.

Thank you.

JCA comment #: 582

Robert

Kutter

Topic Area:

Other

Comment:

As someone that has lost a family member to traffic violence, know that the choices you make in the design and implementation of this project can a will cost vulnerable road user their lives. Think about your friends and family using the active and public transportation options that will be created as part of this project would they want to use the facilities that you are designing? Not just as a recreational activity but as their primary mode of transportation.

As we all know, and has been thoroughly studied, the addition of lanes will not ease or reduce road use in the long run. This project with a 50+ year lifespan needs to not only meet the requirements of today but the transportation needs of the future. Remember that induced demand will not only drive the additional vehicle use and sprawl of the metro, but the non-car facilities will induce demand along the route for all other forms of transit.

Thank you.

JCA comment #: 582

IBR Draft SEIS - RECORD #2718 DETAIL

First Name :	Matthew
Last Name :	Laughter
Attachments :	DSEIS_2718_Laughter_Original.pdf (3 kb)

IBR Draft SEIS - RECORD #2718 DETAIL

Submission Date : 11/17/2024
First Name : Matthew
Last Name : Laughter
Business/Organization/Agency :

Submission Input :

First Name:
Matthew

Last Name:
Laughter

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
We need mass transit and bike lanes included in this project. Putting either of these two transportation methods off will only increase their costs and make them prohibitive for future project. Please act now!

JCA comment #: 581

IBR Draft SEIS - RECORD #2719 DETAIL

First Name :	Fischer
Last Name :	Jemison
Attachments :	DSEIS_2719_Jemison_Original.pdf (3 kb)

IBR Draft SEIS - RECORD #2719 DETAIL

Submission Date : 11/17/2024
First Name : Fischer
Last Name : Jemison
Business/Organization/Agency :

Submission Input :

First Name:
Fischer

Last Name:
Jemison

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
After reviewing the draft SEIS documents for the interstate bridge replacement program, it is clear that this project has exploded in scope and needs to be right-sized. The two most important goals of the project -- building a seismically safe I-5 bridge and connecting Vancouver to Portland's light rail system -- are in serious jeopardy after being bundled with a massive freeway expansion. Building miles of additional lanes on either side of the river will make it impossible to meet the climate goals of the project by inducing huge amounts of traffic and significantly increasing the embodied carbon of the project. The planned freeway widening also creates a huge financial obligation that endangers the fiscal stability of both Oregon and Washington. Planners must revisit the project and create a new design that includes a bridge replacements and light rail expansion, without wasting enormous sums of money adding new lanes to I-5.

JCA comment #: 580

IBR Draft SEIS - RECORD #2720 DETAIL

First Name :	Adam
Last Name :	Zahn
Attachments :	DSEIS_2720_Zahn_Original.pdf (3 kb)

IBR Draft SEIS - RECORD #2720 DETAIL

Submission Date : 11/17/2024
First Name : Adam
Last Name : Zahn
Business/Organization/Agency :

Submission Input :

First Name:
Adam

Last Name:
Zahn

Email:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
Hello,
I am providing comment on the I-5 interstate bridge replacement project. I have seen images of the proposal and there are some obvious weaknesses that will disincentive carbon savings. As we are facing the existential threat of climate change, we must dramatically reduce the human drivers of greenhouse gas emissions. This project must comply with these needs.
The project proposes light rail and active transport lanes, which is essential. However, the proposal makes these options inaccessible while prioritizing ease of single vehicle transit. The needed changes are obvious.
-Mass transit lanes and active transport lanes must be adjacent to each other. People bring their bikes to light rail and putting 8+ lanes of traffic between these two creates a barrier that is painfully loud and smelly.
-Active transit is susceptible to the extreme noise generated by vehicle tires on roads at even modest speeds. It is painful to be exposed to that level of noise. It is also very dangerous, as bikes will be unable to hear their surroundings. Using the mass transit lanes as a barrier between active transport and auto traffic improves safety, comfort, and will foster use.
-This plan gives auto traffic almost three times the dedicated space compared to light rail and active transport. Induced demand is a demonstrated fact. Build more lanes, you will get more cars driving. If you make more light rail and more bike paths, people will use those. This project is dedicating excessive space to the least desirable for of transportation. Cut one lane in each direction for auto traffic and allocate additional space for

light rail and active transport.
-Bike lanes need to extend to the end of the project, not end at the water front, 100 feet in the air. This is an obvious need.

JCA comment #: 579

IBR Draft SEIS - RECORD #2721 DETAIL

First Name :	John
Last Name :	Bates
Attachments :	DSEIS_2721_Bates_Original.pdf (3 kb)

IBR Draft SEIS - RECORD #2721 DETAIL

Submission Date : 11/17/2024
First Name : John
Last Name : Bates
Business/Organization/Agency :

Submission Input :

First Name:
John

Last Name:
Bates

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
Climate change is the most pressing issue of our time. The largest source of greenhouse gasses in the Pacific Northwest is transportation. This project proposed to spend billions of tax payer money in a way that will significantly increase emissions from transportation by incentivizing more trips in single occupancy vehicles. The designers and authorities have an obligation to build something which will not condemn future generations to air pollution and environmental disaster.

JCA comment #: 578

IBR Draft SEIS - RECORD #2722 DETAIL

First Name :	Robert
Last Name :	Wallis
Attachments :	DSEIS_2722_Wallis_Original.pdf (492 kb) 2024 Eng Report Assessing Tunnel Option Robert Wallis.pdf (491 kb)

IBR Draft SEIS - RECORD #2722 DETAIL

Submission Date :	11/17/2024
First Name :	Robert
Last Name :	Wallis
Business/Organization/Agency :	
Attachments :	2024 Eng Report Assessing Tunnel Option Robert Wallis.pdf (491 kb)

Submission Input :

Please accept the following comments:

1. As explained in the attached engineering report, the EIS is not credible due to the fact that IBR team members deceived the public during the critical process of screening technical options to select a locally preferred alternative (LPA). That screening process needs to be revisited and the draft EIS made credible.

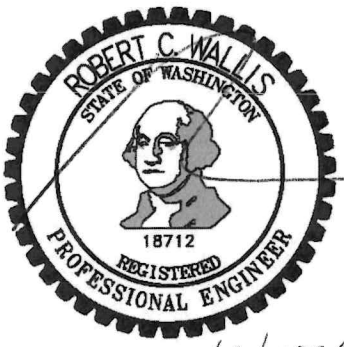
2. The process of selecting the locally preferred alternative was fraudulent as a result of the fact that IBR team fabricated a completely false claim that frontage roads would be necessary for the immersed tube tunnel design option being evaluated during the selection of the LPA. That false claim was made to undermine the opposition of two stakeholder groups who benefited from a tunnel because it avoided the devastating impacts that the fixed-bridge design option, which was selected as the LPA, had upon downtown Vancouver and Hayden Island.

3. There are three alternative sites for the proposed downtown parking garage being considered to serve the LR station. These include an option to locate it east of Columbia Street between 3th and 4th streets. Given the fact that there is a vacant parcel of property equal in size just west of Columbia Street, that proposal is absurd. The parcel east of Columbia is home to a historic building housing six local businesses who employee over 80 people. That historic building would be destroyed and those business forced to relocate. The fact that the IBR team would even consider that option points to gross negligence that corresponds perfectly with the gross negligence displayed by their deceit of the public.

Robert C. Wallis

A Civil Engineering Assessment of the Decision To Reject A Tunnel as an Option To Replace The I-5 Bridge Over the Columbia River

November 6, 2024



11/6/2024

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November 6, 2024

1. Introduction

The States of Oregon and Washington recently released a draft EIS for the proposed $7.5 billion project to replace the I-5 bridge across the Columbia River. That project, called the IBR (Interstate Bridge Replacement Program) is being implemented by a group of Oregon and Washington DOT staff and their consultants, herein called the IBR team.

An initial step in the EIS process was the evaluation of technical options to identify a preferred option for further refinement and environmental evaluation. A fixed bridge option was identified as the preferred option and the others were rejected, including the immersed tube tunnel (ITT) option.

Project critics have alleged that the IBR team deceived the public and elected officials when they provided false information regarding the deficiencies of the ITT design option which led to the rejection of that option. This report evaluates the validity of those allegations and their implications.

2. Conclusions

In evaluating the public record, it is concluded that:

1. During the process of screening design options to replace the existing I-5 bridge over the Columbia River, the public and their elected officials were deceived by the IBR team.

2. That deception was related to false and exaggerated claims regarding the deficiencies of the ITT option during the process of screening design options. One of the more significant false claims – that the ITT option would not enable connections to critical streets without significant out-of-direction travel – was in fact contradicted by IBR consulting engineers. That screening process completely lacks credibility.

3. By undermining the credibility of the process of screening design options, the credibility of the recently released draft EIS was also undermined. The process of screening alternatives should be repeated prior to finalizing the EIS.

4. The IBR team's leadership was negligent. They should be held accountable. If the screening process for the technical alternatives is repeated, which it should be, those involved in the previous screening process should not participate.

3. Background

The process of selecting a replacement of the I-5 bridge over the Columbia River began in the mid-1990's - with internal efforts by the ODOT staff to explore options. ODOT staff assumed that the replacement bridge would be a fixed bridge similar to the I-205 bridge except that it would include light rail.

Officially, that process began in 2005 when the Oregon and Washington DOTs were authorized to proceed with what became known as the Columbia River Crossing (CRC) project. Through that CRC process a fixed-bridge design option was selected and advanced through preliminary design and environmental assessment, leading to a final EIS prepared to meet the requirements of the National Environmental Policy Act (NEPA).

The CRC project was officially terminated 2014. The DOTs of both states continued efforts to implement a bridge replacement project. That effort, now named the Interstate Bridge Replacement Program (IBR) began in earnest in 2019. That project has moved forward through five basic decision making steps – all as mandated by NEPA due to the fact that the project was federally funded.

Step 1 – Establish the Project Team

The I-5 bridge is jointly owned by the states of Oregon and Washington, which means the state legislatures are responsible for making key decisions regarding what bridge replacement project gets built and how it is funded. A Bi-state Legislative Committee from both states was established to guide the process and provide oversight. A wide variety of advisory groups including those from local, state, and federal agencies were established to provide input and recommendations. These are collectively referred to as "the public".

Step 2 – Identify Project Goal.

The Bi-state Legislative Committee agreed to a project goal. In this case - the replacement of the existing bridge.

Step 3 – Identify Options that Meet that Goal.

State DOT staff and their consultants (the IBR team), provided the public with technical options that met the project goal of replacing the bridge. Initially, they did not present the public with the option of an ITT . That option was added as a direct result of public input into the Step 3 process.

Step 4 – Evaluate Options and Select A Preferred Option.

IBR leadership gathered technical information to help inform the public decision-making process. Most of that information came from previous studies completed as part of the CRC. Because the ITT design option was not evaluated in the CRC process, an engineering evaluation of the ITT design option was completed by IBR consultants, and summarized in an engineering report made available to the public. That report was entitled Tunnel Concept Assessment.

Project advisory groups, using a consistent set of parameters to apply to each technical option, compared each option to the others through a screening process to select a locally preferred alternative (LPA). It is important to note that the LPA became a foundational decision to serve as a basis for Step 5 efforts.

That process of evaluating and comparing the technical options was summarized in a

memorandum called the River Crossing Option Comparison. That memorandum reflected what the IBR advised the public and their elected officials during the public meetings and workshops where the technical options were discussed. The most significant category of that advice was technical, based upon the engineering expertise of the IBR team.

Step 5 –Advance Design Efforts and Address Environmental Impacts.

The evaluation of project impacts for the LPA was completed and summarized in a draft EIS which met the requirements of the National Environmental Policy Act.

The first four of these steps are taken for every complex public infrastructure project regardless of whether it is implemented by federal, state, or local government. The intent of this process is to assure that agency staff deliver a project which meets public needs as opposed to their own institutional needs, or the needs of special interest groups having influence over them. The process enables citizens, who pay for public projects, to dictate through their elected officials, what "public" project, if any, gets built.

4. How the Public Was Deceived

The public was deceived by false and misleading technical information regarding the deficiencies of the ITT design option. That information was represented to the public as being the professional opinion of engineers, when it was not.

During the Step 3 process of reviewing and assessing the technical options, there was considerable interest by the public in the ITT design option and strong advocacy for that option. That interest largely disappeared when the IBR team falsely claimed that the ITT design option had a fatal flaw.

The alleged fatal flaw in the ITT option was that it could not enable connections to streets in Downtown Vancouver and Hayden Island or SR-14 without significant out-of-direction travel. That claim was totally untrue, and in fact was explicitly contradicted by the engineering report prepared by IBR team consultants that summarized the engineering evaluation of the ITT design option – the Tunnel Concept Assessment.

In addition to making the false claim regarding connections, the IBR team appears to have exaggerated other ITT tunnel deficiencies.

The IBR team's false and exaggerated claims regarding ITT option deficiencies were made in numerous public meetings and workshops. They were discussed in the report which summarized the process of screening design options – the River Crossing Option Comparison. Those deficiencies were listed in a "fact sheet" that was distributed to the public and made available on their website. That fact sheet - "Why Not A Tunnel" is quoted as follows:

> *"The tunnel design concepts have already been analyzed as river crossing options. Tunnel options do not best address the transportation issues identified in the I-5 bridge corridor, and would result in multiple challenges in the program area. Because of these challenges, tunnel options were removed from consideration.*

Analysis of the tunnel options identified the following challenges:

- *Significant out-of-direction travel for drivers, freight, emergency response vehicles, transit users, bicyclists and pedestrians*
- *The inability to tie into existing connections such as SR 14, Vancouver City Center and Hayden Island*
- *Potential safety concerns for bicyclists and pedestrians*
- *The potential for significant archaeological, cultural and environmental impacts*
- *Cost estimates for a tunnel are estimated to be approximately two times higher than cost estimates for a replacement bridge and approaches. This estimate does not include other highway, interchange or high-capacity transit improvements that would be necessary."*

The first two of these deficiencies are one and the same (the inability to connect means significant out-of-direction travel). If true, *which was not the case*, the ITT design option would not be practical.

The Alleged Deficiencies Regarding Out-of-Direction Travel and Inability to Make Critical Street Connections.

The first two claims regarding ITT deficiencies were that the ITT option would:

1. Present "*Significant out-of-direction travel for drivers, freight, emergency response vehicles, transit users, bicyclists and pedestrians?*
2. Result in "*The inability to tie into existing connections such as SR 14, Vancouver City Center and Hayden Island"?*

Again, they are one and the same. The essential assumption that supports the claim that connections to critical streets cannot be made is that the ITT design option could not include interchange ramps. The IBR design team deceived the public when they told them told that those ramps were impractical. Please note what the IBR team stated in the River Crossing Option Comparison document. They stated that the ITT design option:

> "Requires **unconventional and complex** below-grade construction to accommodate interchange connections consisting of cut and cover tunnels with large temporary excavations. This would make **construction impractical".**

The bold sentences are from the IBR report.

The River Crossing Option Comparison also stated:

> *"The Tunnel Concept Assessment concluded that an ITT is technically feasible; however, there are numerous challenges, as identified in Table 5. These challenges include significant out-of-direction travel for drivers, freight, transit users, bicyclists and pedestrians; the inability to tie into existing connections, such as SR 14, Vancouver City Center, and Hayden Island."*

Compare that comment with the only mention of that issue in the engineering report – Tunnel Concept Assessment and it will become clear that the IBR team's intent was deceit.

> "The ITT would be connected to the above-ground roadway network via cut-and-cover and retained cut connections at either end. Excavation support for these end connections could differ between Vancouver and Hayden Island, as excavations in Vancouver are anticipated to be primarily in gravel alluvium, whereas excavations on Hayden Island are anticipated to be primarily in silt/sand alluvium. The deepest excavations could require ground support systems consisting of braced or restrained secant pile or slurry walls, while shallower excavations may require less robust ground support systems. Ground improvement measures could be incorporated to decrease the potential for seepage through the base of the excavation and to provide long-term support for the constructed cut-and- cover and retained cut sections."

The comment "would be connected to the above grade roadway network" is a total contradiction to what the IBR told the public during the alternative screening process as quoted previously.

In the engineering report prepared by IBR consultants, there is no mention whatsoever of those connections being "impractical". The Tunnel Concept Assessment clearly contradicted the claim about connections. Connections are in fact practical and with those connections, there are no out-of-direction travel deficiencies.

In public meetings and workshops, the IBR team leadership told the public repeatedly that, because there could be no connections from the tunnel to surface streets, frontage roads would be required from the ends of the tunnel where it daylighted at each end over 1,000 feet from the river banks. To get to any point near the river (streets in downtown Vancouver, SR-14, and Hayden Island, would require exiting the tunnel where it surfaced, and back-tracking to where I-5 crossed the streets through those frontage roads, thus the "out-of-direction travel". Here is a quote from the Option Comparison document:

> "As shown, an ITT would likely daylight on the southern end of Hayden Island in Portland and near Evergreen Boulevard in Vancouver. This would eliminate connections to I-5 at SR-14 and Hayden Island."

Those alleged frontage roads would have had drastic impacts upon Downtown Vancouver and Hayden Island. Those business and property owners who had shown initial interest in the ITT design due to the fact that it avoided what they perceived to be "bridge blight" completely lost interest upon being deceived into believing that their properties and businesses would have been devastated by frontage roads. If the IBR team was correct about the inability of the ITT design option to connect to downtown Vancouver streets, it would have effectively destroyed that downtown.

The Alleged Deficiency Regarding Potential Safety Concerns for Bicyclists and Pedestrians

Although there are no meaningful safety concerns for a well-designed tunnel, the fact is that if not designed well or policed, there could be a safety concern. The exact holds true for the fixed bridge options massive above-ground vehicle and pedestrian ramps as well, however that

potential deficiency was not identified for the fixed bridge option. Nor was it noted that the fixed bridge option could "potentially" present additional safety concerns related to the fact that, unlike the ITT design option, pedestrians and bicyclists will be exposed to weather conditions that would result in in slippery surfaces and that associated fall hazards would be increased by high winds.

The Alleged Deficiency Regarding Archaeological, Cultural and Environmental Impacts

The fact that more ground would be excavated with the ITT design option than with the fixed bridge option does mean that there are potentially more archeological impacts. It should be noted that there is no mention of the fact that just downriver from the proposed tunnel, Vancouver's Waterfront Development was constructed with significantly more excavation and site disturbance than would occur with the ITT design option construction. That vast amount of excavation did not have any archeological impacts or cultural impacts.

Nor does the IBR team mention the opportunities that the ITT option would provide for enhancement of cultural resource in the vast amount of open space created above the tunnel.

The IBR team members have emphasized the environmental impacts of dredging, without mentioning the fact that those impacts can be easily managed. The dredging required to install the ITT design option is in fact a small percentage of the dredging that occurs every year to maintain the Columbia River shipping channel.

The Alleged Deficiencies Regarding Cost Estimates

The IBR team stated that the ITT design option would cost twice as much as the fixed bridge option. That statement is very questionable.

The fact that when the IBR team initially provided a cost estimate, it appears to have been based upon three engineering errors that exaggerated costs. One was the assumption that the existing navigation channel would not be relocated for the ITT option. The second was the error made in assuming frontage roads would be required to access critical street connections. The third was an error in the estimated excavation quantities which significantly increased the cost estimate for the ITT design option. Both errors were brought to the attention of the IBR team. They failed to acknowledge the first two errors. They corrected the second but continued to claim that the ITT option was "twice the cost".

The error regarding the ITT option's inability to connect to critical streets is discussed in the previous section. The error in excavation quantities was acknowledged by the IBR team, and thus does not require addressing. The error regarding the navigation channel relocation is discussed in the following subsection.

The Error Regarding The Navigation Channel Location Assumption

The IBR team assumed that the main navigation channel would be relocated for the fixed-bridge option, but not the ITT option. In doing so, the depth, cost, and construction challenges of the ITT option were all exaggerated.

The Tunnel Concept Assessment report included a vertical alignment that was significantly deeper than need be as the result of the failure to assume the main navigation channel would be relocated from its existing location near the north bank of the Columbia to the center of the river. To make that assumption suggests negligence. To understand this please note:

1. As shown on Figure 3 from the Tunnel Concept Assessment (available for review on the IBR project website under "Technical Documents"), there are currently three navigation channels crossing the potential alignments of the tunnel, with the Primary Channel being located within close proximity to the north bank of the Columbia River under the lift-span of the bridge. In addition, there are two barge channels located under the two highest spans of the existing bridge to the south.

2. As shown on Figure 4 from the Tunnel Concept Assessment, the low point of the tunnel was assumed to be below the Primary Channel near the north bank of the Columbia. With the assumption that the Primary Channel will not be relocated, the low point of the tunnel is at approximate 100 feet below the north bank of the river.

3. If a tunnel were to be constructed, regardless of its depth, it is logical to assume that the three channels would be combined into a single channel in the middle of the river. That navigation channel is currently maintained through the entire length of the Columbia from its mouth to Vancouver, except at bridges, where several smaller channels are needed to avoid bridge piers.

4. A credible conceptual tunnel conceptual design would have assumed that the channel would be relocated to the center of the river. Doing so would have put the low-point of the tunnel near the center of the river instead of near the north bank. By sloping the tunnel up from the center of the river to the river banks, the tunnel would be much higher in elevation at its bank and inland. Instead of the tunnel being 90 feet deep at the bank as was assumed in the flawed DOT conceptual design, it would be about 50 feet deep.

In short, by failing to assume the Primary Channel would be relocated to the center of the river, which would be a logical assumption, the tunnel was conceptually designed to be much deeper than necessary where it touches upon land on both sides of the river.

5. The Impact of the Deception Upon the Draft EIS

The draft EIS was prepared assuming the initial screening process was credible, which it was not. That EIS addresses only the fixed bridge option. Without a credible alternative screening process, the draft EIS is not credible.

The process of screening design options resulted in the selection of a locally preferred alternative (LPA). The selection of the LPA was a foundational decision that established the design option upon which the EIS was based. In essence, the draft EIS was prepared based upon a decision that was the end result of deception by the IBR team.

The screening process needs to be repeated without the deception that dominated the process that

resulted in the draft EIS. Those on the IBR team involved in that screening process should not be involved in a repeat of that process. They completely lack credibility.

6. Why IBR Leadership Should Be Held Accountable for Negligence

Negligence is the failure to behave with the level of care that a reasonable person would have exercised under the same circumstances.

It is clear that the process of screening design options and selected a locally preferred alternative was not managed by the IBR team to an acceptable standard of care. They were clearly negligent because they:

1. Claimed ITT deficiencies that did not exist, and exaggerated others.
2. Provided a single engineering evaluation which contained significant errors and not only confused the public, but IBR leadership as well.
3. Violated state professional licensing laws.
4. Skirted those professional licensing laws to avoid accountability for deceiving the public with false engineering information

These acts of negligence are discussed in the following paragraphs.

Exaggeration of Deficiencies

The IBR leadership was negligent in claiming deficiencies when they did not exist, and exaggerating others. That matter is discussed in Section 5 above.

The Deficiencies in the Tunnel Concept Assessment

As mentioned above, of the Tunnel Concept Assessment contradicted what the public was told by the IBR team leadership. Apparently, IBR team leadership were unable to understand the Tunnel Concept Assessment. That suggests that the report was seriously flawed. The IBR team leadership was negligent in not providing the public with an engineering evaluation and report which provided the engineering information that was critical to the success of the public's decision-making process.

The Tunnel Assessment Report Violated Washington State Licensing Laws

Washington State has well-written laws that govern the practice of engineering and the requirements for stamping engineering documents. There are good reasons for those laws, further discussed below. Washington Administrative Code (WAC) WAC 196-23-020 states:

Seal/stamp usage.

> *"The use of the seal/stamp must be in accordance with chapter **18.43** RCW or as otherwise described herein:*
>
> *(1) Final documents are those documents that are prepared and distributed for filing with public officials, use for construction, final agency approvals or use by clients. Any final document must contain the seal/stamp, signature and date of signature of the licensee who prepared or directly supervised the work. For the purpose of this section*

> *"document" is defined as plans, specifications, plats, surveys, land descriptions as defined in WAC* ***332-130-020****, reports, and as-built documents prepared by the licensee. (2) Preliminary documents are those documents not considered final as defined herein, but are released or distributed by the licensee. Preliminary documents must be clearly identified as "preliminary" or contain such wording so it may be differentiated from a final document.* The fact is the TCA was "distributed for filing with public officials" for "final agency approvals".

When released to the public, the Tunnel Concept Assessment did not have a professional stamp. Whether that was for purposes of avoiding accountability, or an oversight, that action clearly violated Washington's licensing law and suggests negligence on the part of the IBR team.

The IBR Team Skirted Professional Licensing Laws.

It is the job of public agency staff and their consultants to inform the public and their elected officials. The IBR team has focused on influencing them, not informing them. In doing so, they have not only violated state licensing laws, but skirted those laws.

The success of the IBR project, like all complex public infrastructure projects depends upon the expertise and ethics of the professional engineers who the public relies upon for advice and opinions on technical matters. State licensing laws exist to provide a mechanism to ensure high professional standards. The public and their elected officials need to trust engineers. Those laws ensure the engineers do not betray that trust.

A key requirement of engineering licensing laws is that engineering reports be stamped by a professional engineer. If that report does have errors that do not reflect an acceptable standard of professional care, the engineer who stamped the report can be held accountable.

The value of these professional licensing laws is made very clear by the fact that IBR leadership falsely claimed that the ITT design option had a fatal flaw, when it did not. Unlike most of the false and misleading claims by the IBR team, this particular claim was addressed in an engineering report which had to be stamped by a professional engineer who could be held accountable. For that reason, the engineering report stated the truth about the fatal flaw false claim made by the IBR team, which totally contradicted the statements by IBR team members interfacing with the public.

The state licensing laws in Washington differ from those in Oregon in that preliminary documents containing engineering information are required to be stamped in Washington and not in Oregon. In Oregon, only final documents need be stamped. That is a flaw in Oregon licensing law because the preliminary documents are used in decision making for those complex projects that require the evaluation of design alternatives. That was exactly what occurred in the decision making process that led to the LPA – preliminary technical information led to the selection of the LPA.

The single technical document prepared to date that was stamped by a professional engineer is the Tunnel Concept Assessment. That document was only stamped after an informal complaint was made to the Washington State Board of Professional Engineers, whose efforts ultimately led

the IBR team to stamp the report.

The IBR team has released other technical documents to the public as can be seen on their website. Because they are technical documents, they should be stamped by a professional engineer, whether they are deemed preliminary or final. None are. The IBR team is negligent in not having them stamped.

Initially, the IBR team members resisted providing an engineering stamp to the Tunnel Concept Assessment. They will likely resist doing so for the other reports. Although Oregon does not have a requirement for providing a professional stamp to preliminary engineering documents, they do for final engineering documents. ODOT also has specific guidelines that address what technical documents need to be stamped by an engineering – TSP11-02d found at https://www.oregon.gov/odot/Engineering/Doc_TechnicalGuidance/TSB11-02d.pdf

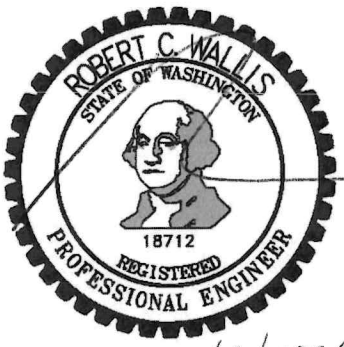
That ODOT guidance document makes it clear what technical documents require an engineering stamp. WSDOT does not appear to have specific guidance but does clearly require that preliminary documents be stamped: "Project Delivery Memo #21-02 – Applying Professional Stamps" accessible at https://wsdot.wa.gov/publications/fulltext/ProjectDev/ProjectDeliveryMemos/Memo21-02.pdf

Considering the fact that the IBR project is required to meet the laws in both Oregon and Washington, it is clear that all of the technical documents listed on the IBR website should be stamped. Given the fact that other aspects of the project besides the decision to reject the ITT design option are dependent upon technical documents to support those decisions, it is clear that they also should be listed as Technical Documents and stamped by a professional engineer. For instance, there are technical documents listed as "Program Fact Sheets" and "Financial Reports" that are clearly based upon engineering, and should be stamped by a professional engineer. None are, with the end result that the professional licensing laws are being skirted.

As mentioned above, professional engineers are held to professional standards that limit their ability to deceive without being held accountable. The IBR team has repeatedly made engineering claims which were alleged to reflect engineering opinions without providing any documentation that would support such opinions. In doing so, they skirted the professional licensing laws and avoided accountability for failure to comply with an acceptable standard of professional care.

A Civil Engineering Assessment of the Decision To Reject A Tunnel as an Option To Replace The I-5 Bridge Over the Columbia River

November 6, 2024



11/6/2024

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The States of Oregon and Washington recently released a draft EIS for the proposed $7.5 billion project to replace the I-5 bridge across the Columbia River. That project, called the IBR (Interstate Bridge Replacement Program) is being implemented by a group of Oregon and Washington DOT staff and their consultants, herein called the IBR team.

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Step 4 – Evaluate Options and Select A Preferred Option.

IBR leadership gathered technical information to help inform the public decision-making process. Most of that information came from previous studies completed as part of the CRC. Because the ITT design option was not evaluated in the CRC process, an engineering evaluation of the ITT design option was completed by IBR consultants, and summarized in an engineering report made available to the public. That report was entitled Tunnel Concept Assessment.

Project advisory groups, using a consistent set of parameters to apply to each technical option, compared each option to the others through a screening process to select a locally preferred alternative (LPA). It is important to note that the LPA became a foundational decision to serve as a basis for Step 5 efforts.

That process of evaluating and comparing the technical options was summarized in a

memorandum called the River Crossing Option Comparison. That memorandum reflected what the IBR advised the public and their elected officials during the public meetings and workshops where the technical options were discussed. The most significant category of that advice was technical, based upon the engineering expertise of the IBR team.

Step 5 –Advance Design Efforts and Address Environmental Impacts.

The evaluation of project impacts for the LPA was completed and summarized in a draft EIS which met the requirements of the National Environmental Policy Act.

The first four of these steps are taken for every complex public infrastructure project regardless of whether it is implemented by federal, state, or local government. The intent of this process is to assure that agency staff deliver a project which meets public needs as opposed to their own institutional needs, or the needs of special interest groups having influence over them. The process enables citizens, who pay for public projects, to dictate through their elected officials, what "public" project, if any, gets built.

4. How the Public Was Deceived

The public was deceived by false and misleading technical information regarding the deficiencies of the ITT design option. That information was represented to the public as being the professional opinion of engineers, when it was not.

During the Step 3 process of reviewing and assessing the technical options, there was considerable interest by the public in the ITT design option and strong advocacy for that option. That interest largely disappeared when the IBR team falsely claimed that the ITT design option had a fatal flaw.

The alleged fatal flaw in the ITT option was that it could not enable connections to streets in Downtown Vancouver and Hayden Island or SR-14 without significant out-of-direction travel. That claim was totally untrue, and in fact was explicitly contradicted by the engineering report prepared by IBR team consultants that summarized the engineering evaluation of the ITT design option – the Tunnel Concept Assessment.

In addition to making the false claim regarding connections, the IBR team appears to have exaggerated other ITT tunnel deficiencies.

The IBR team's false and exaggerated claims regarding ITT option deficiencies were made in numerous public meetings and workshops. They were discussed in the report which summarized the process of screening design options – the River Crossing Option Comparison. Those deficiencies were listed in a "fact sheet" that was distributed to the public and made available on their website. That fact sheet - "Why Not A Tunnel" is quoted as follows:

"The tunnel design concepts have already been analyzed as river crossing options. Tunnel options do not best address the transportation issues identified in the I-5 bridge corridor, and would result in multiple challenges in the program area. Because of these challenges, tunnel options were removed from consideration.

Analysis of the tunnel options identified the following challenges:

- *Significant out-of-direction travel for drivers, freight, emergency response vehicles, transit users, bicyclists and pedestrians*
- *The inability to tie into existing connections such as SR 14, Vancouver City Center and Hayden Island*
- *Potential safety concerns for bicyclists and pedestrians*
- *The potential for significant archaeological, cultural and environmental impacts*
- *Cost estimates for a tunnel are estimated to be approximately two times higher than cost estimates for a replacement bridge and approaches. This estimate does not include other highway, interchange or high-capacity transit improvements that would be necessary."*

The first two of these deficiencies are one and the same (the inability to connect means significant out-of-direction travel). If true, *which was not the case*, the ITT design option would not be practical.

The Alleged Deficiencies Regarding Out-of-Direction Travel and Inability to Make Critical Street Connections.

The first two claims regarding ITT deficiencies were that the ITT option would:

1. Present "*Significant out-of-direction travel for drivers, freight, emergency response vehicles, transit users, bicyclists and pedestrians?*
2. Result in "*The inability to tie into existing connections such as SR 14, Vancouver City Center and Hayden Island"?*

Again, they are one and the same. The essential assumption that supports the claim that connections to critical streets cannot be made is that the ITT design option could not include interchange ramps. The IBR design team deceived the public when they told them told that those ramps were impractical. Please note what the IBR team stated in the River Crossing Option Comparison document. They stated that the ITT design option:

> "Requires **unconventional and complex** below-grade construction to accommodate interchange connections consisting of cut and cover tunnels with large temporary excavations. This would make **construction impractical".**

The bold sentences are from the IBR report.

The River Crossing Option Comparison also stated:

> *"The Tunnel Concept Assessment concluded that an ITT is technically feasible; however, there are numerous challenges, as identified in Table 5. These challenges include significant out-of-direction travel for drivers, freight, transit users, bicyclists and pedestrians; the inability to tie into existing connections, such as SR 14, Vancouver City Center, and Hayden Island."*

Compare that comment with the only mention of that issue in the engineering report – Tunnel Concept Assessment and it will become clear that the IBR team's intent was deceit.

> "The ITT would be connected to the above-ground roadway network via cut-and-cover and retained cut connections at either end. Excavation support for these end connections could differ between Vancouver and Hayden Island, as excavations in Vancouver are anticipated to be primarily in gravel alluvium, whereas excavations on Hayden Island are anticipated to be primarily in silt/sand alluvium. The deepest excavations could require ground support systems consisting of braced or restrained secant pile or slurry walls, while shallower excavations may require less robust ground support systems. Ground improvement measures could be incorporated to decrease the potential for seepage through the base of the excavation and to provide long-term support for the constructed cut-and- cover and retained cut sections."

The comment "would be connected to the above grade roadway network" is a total contradiction to what the IBR told the public during the alternative screening process as quoted previously.

In the engineering report prepared by IBR consultants, there is no mention whatsoever of those connections being "impractical". The Tunnel Concept Assessment clearly contradicted the claim about connections. Connections are in fact practical and with those connections, there are no out-of-direction travel deficiencies.

In public meetings and workshops, the IBR team leadership told the public repeatedly that, because there could be no connections from the tunnel to surface streets, frontage roads would be required from the ends of the tunnel where it daylighted at each end over 1,000 feet from the river banks. To get to any point near the river (streets in downtown Vancouver, SR-14, and Hayden Island, would require exiting the tunnel where it surfaced, and back-tracking to where I-5 crossed the streets through those frontage roads, thus the "out-of-direction travel". Here is a quote from the Option Comparison document:

> "As shown, an ITT would likely daylight on the southern end of Hayden Island in Portland and near Evergreen Boulevard in Vancouver. This would eliminate connections to I-5 at SR-14 and Hayden Island."

Those alleged frontage roads would have had drastic impacts upon Downtown Vancouver and Hayden Island. Those business and property owners who had shown initial interest in the ITT design due to the fact that it avoided what they perceived to be "bridge blight" completely lost interest upon being deceived into believing that their properties and businesses would have been devastated by frontage roads. If the IBR team was correct about the inability of the ITT design option to connect to downtown Vancouver streets, it would have effectively destroyed that downtown.

The Alleged Deficiency Regarding Potential Safety Concerns for Bicyclists and Pedestrians

Although there are no meaningful safety concerns for a well-designed tunnel, the fact is that if not designed well or policed, there could be a safety concern. The exact holds true for the fixed bridge options massive above-ground vehicle and pedestrian ramps as well, however that

potential deficiency was not identified for the fixed bridge option. Nor was it noted that the fixed bridge option could "potentially" present additional safety concerns related to the fact that, unlike the ITT design option, pedestrians and bicyclists will be exposed to weather conditions that would result in in slippery surfaces and that associated fall hazards would be increased by high winds.

The Alleged Deficiency Regarding Archaeological, Cultural and Environmental Impacts

The fact that more ground would be excavated with the ITT design option than with the fixed bridge option does mean that there are potentially more archeological impacts. It should be noted that there is no mention of the fact that just downriver from the proposed tunnel, Vancouver's Waterfront Development was constructed with significantly more excavation and site disturbance than would occur with the ITT design option construction. That vast amount of excavation did not have any archeological impacts or cultural impacts.

Nor does the IBR team mention the opportunities that the ITT option would provide for enhancement of cultural resource in the vast amount of open space created above the tunnel.

The IBR team members have emphasized the environmental impacts of dredging, without mentioning the fact that those impacts can be easily managed. The dredging required to install the ITT design option is in fact a small percentage of the dredging that occurs every year to maintain the Columbia River shipping channel.

The Alleged Deficiencies Regarding Cost Estimates

The IBR team stated that the ITT design option would cost twice as much as the fixed bridge option. That statement is very questionable.

The fact that when the IBR team initially provided a cost estimate, it appears to have been based upon three engineering errors that exaggerated costs. One was the assumption that the existing navigation channel would not be relocated for the ITT option. The second was the error made in assuming frontage roads would be required to access critical street connections. The third was an error in the estimated excavation quantities which significantly increased the cost estimate for the ITT design option. Both errors were brought to the attention of the IBR team. They failed to acknowledge the first two errors. They corrected the second but continued to claim that the ITT option was "twice the cost".

The error regarding the ITT option's inability to connect to critical streets is discussed in the previous section. The error in excavation quantities was acknowledged by the IBR team, and thus does not require addressing. The error regarding the navigation channel relocation is discussed in the following subsection.

The Error Regarding The Navigation Channel Location Assumption

The IBR team assumed that the main navigation channel would be relocated for the fixed-bridge option, but not the ITT option. In doing so, the depth, cost, and construction challenges of the ITT option were all exaggerated.

The Tunnel Concept Assessment report included a vertical alignment that was significantly deeper than need be as the result of the failure to assume the main navigation channel would be relocated from its existing location near the north bank of the Columbia to the center of the river. To make that assumption suggests negligence. To understand this please note:

1. As shown on Figure 3 from the Tunnel Concept Assessment (available for review on the IBR project website under "Technical Documents"), there are currently three navigation channels crossing the potential alignments of the tunnel, with the Primary Channel being located within close proximity to the north bank of the Columbia River under the lift-span of the bridge. In addition, there are two barge channels located under the two highest spans of the existing bridge to the south.

2. As shown on Figure 4 from the Tunnel Concept Assessment, the low point of the tunnel was assumed to be below the Primary Channel near the north bank of the Columbia. With the assumption that the Primary Channel will not be relocated, the low point of the tunnel is at approximate 100 feet below the north bank of the river.

3. If a tunnel were to be constructed, regardless of its depth, it is logical to assume that the three channels would be combined into a single channel in the middle of the river. That navigation channel is currently maintained through the entire length of the Columbia from its mouth to Vancouver, except at bridges, where several smaller channels are needed to avoid bridge piers.

4. A credible conceptual tunnel conceptual design would have assumed that the channel would be relocated to the center of the river. Doing so would have put the low-point of the tunnel near the center of the river instead of near the north bank. By sloping the tunnel up from the center of the river to the river banks, the tunnel would be much higher in elevation at its bank and inland. Instead of the tunnel being 90 feet deep at the bank as was assumed in the flawed DOT conceptual design, it would be about 50 feet deep.

In short, by failing to assume the Primary Channel would be relocated to the center of the river, which would be a logical assumption, the tunnel was conceptually designed to be much deeper than necessary where it touches upon land on both sides of the river.

5. The Impact of the Deception Upon the Draft EIS

The draft EIS was prepared assuming the initial screening process was credible, which it was not. That EIS addresses only the fixed bridge option. Without a credible alternative screening process, the draft EIS is not credible.

The process of screening design options resulted in the selection of a locally preferred alternative (LPA). The selection of the LPA was a foundational decision that established the design option upon which the EIS was based. In essence, the draft EIS was prepared based upon a decision that was the end result of deception by the IBR team.

The screening process needs to be repeated without the deception that dominated the process that

resulted in the draft EIS. Those on the IBR team involved in that screening process should not be involved in a repeat of that process. They completely lack credibility.

6. Why IBR Leadership Should Be Held Accountable for Negligence

Negligence is the failure to behave with the level of care that a reasonable person would have exercised under the same circumstances.

It is clear that the process of screening design options and selected a locally preferred alternative was not managed by the IBR team to an acceptable standard of care. They were clearly negligent because they:

1. Claimed ITT deficiencies that did not exist, and exaggerated others.
2. Provided a single engineering evaluation which contained significant errors and not only confused the public, but IBR leadership as well.
3. Violated state professional licensing laws.
4. Skirted those professional licensing laws to avoid accountability for deceiving the public with false engineering information

These acts of negligence are discussed in the following paragraphs.

Exaggeration of Deficiencies

The IBR leadership was negligent in claiming deficiencies when they did not exist, and exaggerating others. That matter is discussed in Section 5 above.

The Deficiencies in the Tunnel Concept Assessment

As mentioned above, of the Tunnel Concept Assessment contradicted what the public was told by the IBR team leadership. Apparently, IBR team leadership were unable to understand the Tunnel Concept Assessment. That suggests that the report was seriously flawed. The IBR team leadership was negligent in not providing the public with an engineering evaluation and report which provided the engineering information that was critical to the success of the public's decision-making process.

The Tunnel Assessment Report Violated Washington State Licensing Laws

Washington State has well-written laws that govern the practice of engineering and the requirements for stamping engineering documents. There are good reasons for those laws, further discussed below. Washington Administrative Code (WAC) WAC 196-23-020 states:

Seal/stamp usage.

> *"The use of the seal/stamp must be in accordance with chapter **18.43** RCW or as otherwise described herein:*
>
> *(1) Final documents are those documents that are prepared and distributed for filing with public officials, use for construction, final agency approvals or use by clients. Any final document must contain the seal/stamp, signature and date of signature of the licensee who prepared or directly supervised the work. For the purpose of this section*

> *"document" is defined as plans, specifications, plats, surveys, land descriptions as defined in WAC* ***332-130-020****, reports, and as-built documents prepared by the licensee. (2) Preliminary documents are those documents not considered final as defined herein, but are released or distributed by the licensee. Preliminary documents must be clearly identified as "preliminary" or contain such wording so it may be differentiated from a final document.* The fact is the TCA was "distributed for filing with public officials" for "final agency approvals".

When released to the public, the Tunnel Concept Assessment did not have a professional stamp. Whether that was for purposes of avoiding accountability, or an oversight, that action clearly violated Washington's licensing law and suggests negligence on the part of the IBR team.

The IBR Team Skirted Professional Licensing Laws.

It is the job of public agency staff and their consultants to inform the public and their elected officials. The IBR team has focused on influencing them, not informing them. In doing so, they have not only violated state licensing laws, but skirted those laws.

The success of the IBR project, like all complex public infrastructure projects depends upon the expertise and ethics of the professional engineers who the public relies upon for advice and opinions on technical matters. State licensing laws exist to provide a mechanism to ensure high professional standards. The public and their elected officials need to trust engineers. Those laws ensure the engineers do not betray that trust.

A key requirement of engineering licensing laws is that engineering reports be stamped by a professional engineer. If that report does have errors that do not reflect an acceptable standard of professional care, the engineer who stamped the report can be held accountable.

The value of these professional licensing laws is made very clear by the fact that IBR leadership falsely claimed that the ITT design option had a fatal flaw, when it did not. Unlike most of the false and misleading claims by the IBR team, this particular claim was addressed in an engineering report which had to be stamped by a professional engineer who could be held accountable. For that reason, the engineering report stated the truth about the fatal flaw false claim made by the IBR team, which totally contradicted the statements by IBR team members interfacing with the public.

The state licensing laws in Washington differ from those in Oregon in that preliminary documents containing engineering information are required to be stamped in Washington and not in Oregon. In Oregon, only final documents need be stamped. That is a flaw in Oregon licensing law because the preliminary documents are used in decision making for those complex projects that require the evaluation of design alternatives. That was exactly what occurred in the decision making process that led to the LPA – preliminary technical information led to the selection of the LPA.

The single technical document prepared to date that was stamped by a professional engineer is the Tunnel Concept Assessment. That document was only stamped after an informal complaint was made to the Washington State Board of Professional Engineers, whose efforts ultimately led

the IBR team to stamp the report.

The IBR team has released other technical documents to the public as can be seen on their website. Because they are technical documents, they should be stamped by a professional engineer, whether they are deemed preliminary or final. None are. The IBR team is negligent in not having them stamped.

Initially, the IBR team members resisted providing an engineering stamp to the Tunnel Concept Assessment. They will likely resist doing so for the other reports. Although Oregon does not have a requirement for providing a professional stamp to preliminary engineering documents, they do for final engineering documents. ODOT also has specific guidelines that address what technical documents need to be stamped by an engineering – TSP11-02d found at https://www.oregon.gov/odot/Engineering/Doc_TechnicalGuidance/TSB11-02d.pdf

That ODOT guidance document makes it clear what technical documents require an engineering stamp. WSDOT does not appear to have specific guidance but does clearly require that preliminary documents be stamped: "Project Delivery Memo #21-02 – Applying Professional Stamps" accessible at https://wsdot.wa.gov/publications/fulltext/ProjectDev/ProjectDeliveryMemos/Memo21-02.pdf

Considering the fact that the IBR project is required to meet the laws in both Oregon and Washington, it is clear that all of the technical documents listed on the IBR website should be stamped. Given the fact that other aspects of the project besides the decision to reject the ITT design option are dependent upon technical documents to support those decisions, it is clear that they also should be listed as Technical Documents and stamped by a professional engineer. For instance, there are technical documents listed as "Program Fact Sheets" and "Financial Reports" that are clearly based upon engineering, and should be stamped by a professional engineer. None are, with the end result that the professional licensing laws are being skirted.

As mentioned above, professional engineers are held to professional standards that limit their ability to deceive without being held accountable. The IBR team has repeatedly made engineering claims which were alleged to reflect engineering opinions without providing any documentation that would support such opinions. In doing so, they skirted the professional licensing laws and avoided accountability for failure to comply with an acceptable standard of professional care.

IBR Draft SEIS - RECORD #2724 DETAIL

First Name :	Amy
Last Name :	Houchen
Attachments :	DSEIS_2724_Houchen_Original.pdf (3 kb)

IBR Draft SEIS - RECORD #2724 DETAIL

Submission Date : 11/17/2024
First Name : Amy
Last Name : Houchen
Business/Organization/Agency :

Submission Input :

First Name:
Amy

Last Name:
Houchen

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
Among the reasons to right-size the project (ie, without adding more freeway lanes):
Induced demand is real. We can't expand our way out of congestion, because additional roads invite additional vehicles.
Downstream costs include maintenance. With ODOT in financial difficulties and federal dollars soon subject to a budget-slashing new administration, we shouldn't build more than we can safely maintain without

shortchanging other roads and bridges around the state.

JCA comment #: 576

IBR Draft SEIS - RECORD #2725 DETAIL

First Name :	CHRIS
Last Name :	KING
Attachments :	DSEIS_2725_King_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2725 DETAIL

Submission Date :	11/17/2024
First Name :	CHRIS
Last Name :	KING
Business/Organization/Agency :	

Submission Input :

I am writing you to record my comments publicly regarding your draft SEIS.

Page six of the executive summary in the SEIS states "Due to limited public transportation options, a number of transportation markets are not well served" I question the validity of this statement, as well as any need for extension of light rail.

At present, only 1.7% of Interstate Bridge crossings on an average weekdays are Transit related. The CTRAN buses and vans that provide this service are underutilized. So how is it that any transportation markets are under-served? There is plenty of current capacity, the ability to adapt future needs, at a much lower cost than a light-rail extension.

Clark County voters have rejected a light rail extension multiple times. I can speak for the constituents in my precinct, that sentiment has not changed. We oppose any Interstate Bridge project that includes light rail

Chris King
Republican Precinct Committee Officer, 688

IBR Draft SEIS - RECORD #2727 DETAIL

First Name :	Sokho
Last Name :	Eath
Attachments :	DSEIS_2727_Eath_Original.pdf (2 kb)

IBR Draft SEIS - RECORD #2727 DETAIL

Submission Date : 11/18/2024
First Name : Sokho
Last Name : Eath
Business/Organization/Agency :

Submission Input :

I submit this comment as a local resident that uses the Interstate Bridge often to both commute to and from Oregon and Washington.

The Interstate Bridge is a vital part of our local transportation system, and with the findings of this impact statement, I believe that the plans as set forth by the IBR project should go forward. Our region desperately needs a new bridge to matches the importance of the I-5 Interstate corridor through the Portland Metro area. It is important that the bridge is both replaced with adequate lanes, ample public transportation, bicycle, and pedestrian access. The findings of the report to minimize harm and look at alternatives, or no builds points clearly towards the need of the IBR as proposed by the project. A new bridge – fix span bridge – is necessary and essential to support the growth of the region to avoid to any delay to other factors both from the river's use, as well as the space around it. The project's proposal of local access to the Oregon side islands is important to the growth of those areas including Tomahawk and Hayden Island from MLK JR Blvd in Portland. The project's proposal of light rail and access to Vancouver to and from Portland is important to the region's overall connectivity.

This project meets all the needs of the communities and key interests. It may not be perfect for each interested party, but it presents and provides a realistic connection to what new projects and needs should be done following the bridge's completion. At this stage, while there is much debate on tolling – such debate should not hinder the bridge's progress. Rather, this project should move forward – with the findings of this draft impact report - and move our region in the direction of one day replacing the old bridge with a new one that can meet the region's current, project demands, and potentials.

IBR Draft SEIS - RECORD #2728 DETAIL

First Name :	Gary
Last Name :	Clark
Attachments :	DSEIS_2728_Clark_Original.pdf (3 kb) Billboard-Sign-.jpg (424 kb)

IBR Draft SEIS - RECORD #2728 DETAIL

Submission Date :	11/17/2024
First Name :	Gary
Last Name :	Clark
Business/Organization/Agency :	Electronic Security Consultants, LLC

Submission Input :

First Name:
Gary

Last Name:
Clark

Business or Organization:
Electronic Security Consultants, LLC

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
I'm firmly against the IBRP bridge designs. It's too expensive and too high of a bridge for our communities. The

toll's will be a burden on all of us, and our elderly will be severely impacted by the 15 years of contruction to complete the bridge.

Attachment (maximum one):
Billboard-Sign-.jpg

JCA comment #: 574

IBR Draft SEIS - RECORD #2729 DETAIL

First Name :	Luanna
Last Name :	Grow
Attachments :	DSEIS_2729_Grow_Original.pdf (4 kb)

IBR Draft SEIS - RECORD #2729 DETAIL

Submission Date : 11/17/2024
First Name : Luanna
Last Name : Grow
Business/Organization/Agency :

Submission Input :

Interstate Bridge Replacement Program

Thank you for the opportunity to comment.

I want to thank you for our excellent public outreach. I have received many emails and mail notifications, and attended several public meetings and a meeting with our community on Hayden Island. I also took the opportunity to visit the office in Vancouver for a one-on-one view of the proposals.

I do not support many of the statements made by HiNoon on behalf of Hayden Island residents, specifically, references to the lack of need for the new bridge, that a tunnel is a viable option, and many more. Please note they do not represent my views. I have lived on Hayden Island for more than 17 years.

Of most concern to me is the ability to get on and off the island, to and from Vancouver and south into Portland. While it is valuable at all times, I am mostly concerned for critical access during medical emergencies. When the freeway is blocked with traffic, ambulances are unable to get us to medical care. Having additional access lanes and options to get either north or south is critically important to Hayden Island residents.

The arterial bridge taking us to north Portland looks promising. My understanding is that the access southbound on I-5 for us is from this arterial bridge that joins Marine Drive. There is a lot of freight traffic as well as shoppers and residents using Hayden Island each day. The current ramp from Marine Drive to I-5 north is a huge bottleneck, and needs special attention. Take great care to make those transitions as seamless as possible. I will not miss the North Harbor Bridge.

Safety is a big concern for Hayden Island residents. Our current access North from Hayden Island is unsafe. I am comforted to see a much longer on-ramp to get up on the bridge in the current infrastructure plan and that the lane does not have to merge if we are going onto SR14, and if we do merge, we have lots of time. Safety shoulders on the bridge and the access ramps are very important.

The I-5 bridge has the only stoplight on I-5 between Mexica and Canada (or so I’ve heard). I prefer a fixed span bridge, rather than a lift or moveable span if that is possible. So much of the traffic problems we face getting to and from Hayden Island are because of bridge lifts. Design wise, I have no strong preference for either the double-deck or single-level bridge options. Again, this isn’t just a time saving question, it can also be a life-saving consideration. River traffic is important, but the vehicles, light rail, busses and bicycle rider far outnumber the commercial river users. Tall loads could go by rail or some other route to avoid a lift bridge.

Our public transportation options on Hayden Island are limited, and often affected by freeway backup. Please keep the light rail station on Hayden Island in the plan. I also support a stop near the new Vancouver waterfront area, as well as near the Park and Ride planned for downtown Vancouver.

While I am not looking forward to tolls, I understand the need. Not only will they pay for construction and operations and maintenance, they also improve movement through the area because demand is affected. People may think twice about their need to use this interstate freeway due to tolling. That will reduce congestion, air pollution from idling and make the project as user-funded as possible. I strongly support variable tolling with higher prices during congestion times. Shifting to off-peak hours, when possible, helps motorists and the environment. Low income discounts should be part of the plan. Freight traffic, and all extra heavy vehicles should pay more.

Because I live on the island, I am very dependent on the businesses here. I shop at Target and many other stores, eat at local restaurants, and enjoy a feeling of community. Please be aware of the impact on businesses as you plan the infrastructure work, and impact our way of life during the years this project will be underway.

Luanna Grow
[redacted]
[redacted]

IBR Draft SEIS - RECORD #2730 DETAIL

First Name :	Sean
Last Name :	Edging
Attachments :	2730_Original.pdf (122 kb)

Sean M. Edging
1510 N Kilpatrick St., Portland, OR. 97217
smedging@gmail.com

Subject: Public Comment - Interstate Bridge Replacement Program

The purpose of this letter is to submit public comment on the Interstate Bridge Replacement (IBR) Program Draft Supplemental Environmental Impact Statement (SEIS). I am submitting this comment as both a local resident living within a mile of the study area, as well as a professional urban planner with expertise in housing and transportation. The comments submitted herein reflect my own personal views and do not reflect the views of any department or organization, including my employer.

The Interstate Bridge Replacement represents a key infrastructure investment necessary for the long-term social and economic resilience of the Portland Metropolitan region and for Oregon and Washington writ large. This investment also comes at an urgent time of crisis - as this investment is underway, Oregon is experiencing major climate catastrophes at an increasing pace. It is incredibly urgent for Oregon to take substantial actions that mitigate climate pollution and increase resilience against the increasingly severe consequences of climate change. This is more than a moral imperative, it is a mandate; the Oregon Department of Transportation (ODOT) is directed to do precisely this under Executive Order 20-04[1]:

> **Agency Decisions.** To the full extent allowed by law, agencies shall consider and integrate climate change, climate change impacts, and the state's GHG emissions reduction goals into their planning, budgets, investments, and policy making decisions. While carrying out that directive, agencies are directed to:
>
> (1) Prioritize actions that reduce GHG emissions in a cost effective manner;
> (2) Prioritize actions that will help vulnerable populations and impacted communities adapt to climate change impacts; and
> (3) Consult with the Environmental Justice Task Force when evaluating climate change mitigation and adaptation priorities and actions.

As drafted, the draft SEIS argues that the the proposed improvements, including highway widening to include one to two auxiliary lanes, are necessary to ameliorate congestion conditions. From the executive summary:

> Existing travel demand exceeds capacity in the Interstate Bridge and associated interchanges. This corridor experiences heavy congestion and delay lasting 4 to 6 hours daily during the morning and afternoon peak travel periods and when traffic crashes, vehicle breakdowns, or bridge lifts occur. Due to excess travel demand and congestion in the I-5 corridor, many trips take the longer, alternative I-205 route across the Columbia River. Spillover traffic from I-5 onto parallel arterials such as Martin Luther King Jr. Boulevard and Interstate Avenue increases local congestion. In 2005, the two crossings carried 280,000 vehicle trips across the Columbia River daily. Daily traffic demand over the Interstate Bridge is projected to increase by more than 35% during the next 20 years, with stop-and-go conditions increasing to approximately 15 hours daily if no improvements are made. (pg. S-5)

I am deeply concerned about the continued practice of both leadership and senior project staff at the Oregon Department of Transportation engaging in a pattern and practice of ignoring the agency's obligations under state law to plan for the reduction in vehicle miles traveled. Instead, the agency consistently perpetuates an

[1] Executive Order 20-04. Accessed via: https://www.oregon.gov/gov/Pages/executive-orders.aspx

increasingly dangerous status quo of increasing vehicle capacity in spite of the safety, health, economic, or environmental impacts of such decisions.

This dynamic is rooted in an outdated and disproven belief in the efficacy of highway widening in reducing congestion, despite the overwhelming evidence that such widenings do not decrease congestion in the long-term[2], increase vehicle miles traveled (and climate pollution) through induced demand[3], and increase patterns of car-dependent development that are increasingly killing or injuring Americans, while roads in other developed countries become safer[4]. Instead of acknowledging the inherent legacy and harms perpetuated by highway expansion, the draft SEIS doubles down on formulating a plausible narrative supporting highway expansion, despite the fact that the problems that the draft SEIS proposes fixing will not be addressed by perpetuating an inequitable status quo.

To be clear, these justifications are not needed - there is a clear and compelling rationale supporting the replacement of the existing bridge, ideally to support a sustainable transportation future. I believe that the draft SEIS can and should be amended to reflect this goal, in alignment with ODOT's obligation to reduce vehicle miles traveled and associated climate pollution and impacts to vulnerable community members.

Key Recommendations

To address the concerns identified above, I recommend the following amendments to the draft SEIS to reflect an acknowledgement of the urgent need to build towards a safe, equitable, and sustainable transportation future, as ODOT is required to do under state law:

1. **Honestly and explicitly acknowledge and recognize the impacts created by the highway, instead of continuing to double down on creating a false narrative that highway expansion will paradoxically reduce congestion while mitigating climate pollution. It cannot do both.**

Without the replacement, the current bridge faces major risk of collapse due to age or a future seismic event - this alone is a compelling reason for supporting the replacement. Additionally, acquiring sufficient right-of-way is not intrinsically a poor idea; this right-of-way can be repurposed for future investments in safe and sustainable transportation infrastructure, such as high-speed rail. However, the prospect that yet another highway widening will somehow both reduce congestion and climate pollution, in spite of the evidence to the contrary, is a fantasy that continues to undermines the public's faith that ODOT leadership is capable of a just transition to a sustainable future.

2. **Recognize the most effective tools that this bridge project has in both alleviating congestion, reducing vehicle miles traveled, and improving equitable outcomes: congestion pricing (tolling) and supporting viable alternatives to driving (transit and micromobility).**

Tolling or congestion pricing represents one of the most effective tools available to ODOT to both reduce congestion at peak hours and to contribute to (though not fully solve) the $354 million revenue shortfall that ODOT faces. This tolling should not be limited to simply paying for the bridge - it should be expanded for both I-5 and I-205 bridges to ensure that Washington drivers pay into the maintenance of Oregon roads they directly benefit from. While I recognize the political difficulty associated with congestion pricing elsewhere in the

[2] Garcia-López, M. À., Pasidis, I., & Viladecans-Marsal, E. (2022). Congestion in highways when tolls and railroads matter: Evidence from European cities. *Journal of Economic Geography*, *22*(5), 931-960.
[3] Goodwin, P.B. Empirical evidence on induced traffic. *Transportation* **23**, 35–54 (1996). https://doi.org/10.1007/BF00166218
[4] Brausell, J. (2019) . U.S. Pedestrian Fatalities Rise, While European Pedestrian Fatalities Fall. *Planetizen*. Accessed via: https://www.planetizen.com/news/2019/07/105095-us-pedestrian-fatalities-rise-while-european-pedestrian-fatalities-fall

Oregon Metro, tolling the bridges during peak hour is both politically viable and necessary to ensure ODOT has sufficient revenue to support the long-term maintenance and safety improvements that Oregon's roads desperately need.

To be clear on the equity implications of tolling - Washington drivers do not pay for the maintenance of Oregon's roads currently, in spite of their disproportionate use and benefit from the ability to drive on Oregon's roads. This has the effect of shifting the taxation burden from Washington drivers onto Oregon residents, including both drivers and non-drivers, through both gas tax and property tax revenue that must be dedicated to roadway maintenance created by the wear and tear of cars from Washington. To be clear, **this system of taxation is inequitable, especially to community members who cannot drive or afford a car**. And this ignores the other detrimental equity impacts associated with car dependency that falls on vulnerable communities, such as exposure to environmental health risks and hazards or lack of access to employment opportunities and community amenities.

Tolling represents a significantly more progressive form of taxation that charges users for the impact they create on the system. While the impact of tolling on lower-income communities is not zero, it is substantially mitigated by the fact that car ownership and vehicle miles traveled scale by income and wealth (i.e. more money = more cars)[5], and can further be mitigated with programs that provide offsetting investments (e.g. transit investment) that support lower-income households[6]. In spite of this evidence, the SEIS paradoxically concludes the opposite, which functionally builds in its own political demise when wealthy drivers inevitably use the name of 'equity' in a politically-cynical campaign to avoid paying into a system they benefit directly from. This will push the taxation burden of maintaining Oregon's roads (both state and local) onto lower-income households, disproportionately burdening those who cannot drive or afford a car.

The inclusion of dedicated transit and bike/pedestrian infrastructure is commendable and a necessary inclusion for the bridge to support a climate resilience future. These alternatives should be designed in a manner to complement each other - for example, these modes should be integrated to complement each other and made efficient, safe, and convenient for users. They should not be separated for the convenience of drivers.

Paired with effective congestion pricing on both the I-5 and I-205 bridges, effective investments in efficient, high-quality transit, pedestrian, and biking infrastructure will both help meaningfully alleviate congestion on the resultant bridge while making meaningful reductions in vehicle miles traveled and associated climate pollution. It will also substantially enhance mobility for those currently disenfranchised by the car-dependency of the bridge, especially lower-income households, older/younger individuals who cannot drive, and people with disabilities, many of whom cannot traverse the bridge in its current form. This should be emphasized as a key method by which the project can meaningfully increase equitable outcomes.

Thank you for the opportunity to comment. Please feel free to reach out if you have any questions related to this public comment.

Sincerely,

Sean Edging, Resident

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[5] Place, E. (2012) More Money, More Cars. *Sightline Institute.* Accessed via: https://www.sightline.org/2011/11/28/more-money-more-cars/

[6] Wilson, K. (2020). *Streetsblog USA*. Accessed via: https://usa.streetsblog.org/2020/05/29/congestion-pricing-can-be-built-for-equity

IBR Draft SEIS - RECORD #2732 DETAIL

First Name :	Bryce
Last Name :	Bederka
Attachments :	DSEIS_2732_Bederka_Original.pdf (3 kb)

IBR Draft SEIS - RECORD #2732 DETAIL

Submission Date : 11/17/2024
First Name : Bryce
Last Name : Bederka
Business/Organization/Agency :

Submission Input :

First Name:
Bryce

Last Name:
Bederka

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
It seems to me that the planned interstate bridge as a single span is a poor compromise to serve the needs of Hayden Island, light rail, pedestrian/bicycle, heavy vehicles, and commuter/light vehicle traffic.
Why not two spans, one higher fixed span for commuter/light vehicles and a second lower moveable span for Hayden Island (and connections to WA 14 and Marine Drive), light rail, pedestrian/bicycle and heavy vehicles. This dual span would seem to serve the different constituents better than a single fixed span which remains unable to meet the river navigation needs for the Columbia.

JCA comment #: 572

IBR Draft SEIS - RECORD #2734 DETAIL

First Name :	Rick
Last Name :	Kappler
Attachments :	DSEIS_2734_Kappler_Original.pdf (3 kb)

IBR Draft SEIS - RECORD #2734 DETAIL

Submission Date : 11/17/2024
First Name : Rick
Last Name : Kappler
Business/Organization/Agency :

Submission Input :

First Name:
Rick

Last Name:
Kappler

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Land Use and Economy

Comment:
You have made serious errors: the current design has the multi-use path on one side of the bridge and transit on the other, about 200 feet apart. We know multimodal trips are key for pedestrians and putting these transportation options side-by-side reduces out of direction travel, eases transfers, and has a number of additional benefits. The multi-use path should be next to the MAX line, not on opposite sides of the bridge as it is currently designed.

JCA comment #: 570

IBR Draft SEIS - RECORD #2736 DETAIL

First Name :	Virginia
Last Name :	Edwards
Attachments :	DSEIS_2736_Edwards_Original.pdf (3 kb)

IBR Draft SEIS - RECORD #2736 DETAIL

Submission Date : 11/17/2024
First Name : Virginia
Last Name : Edwards
Business/Organization/Agency :

Submission Input :

First Name:
Virginia

Last Name:
Edwards

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
Please make this bridge both usable and iconic. It is the gateway to Oregon or Washington. It will be there a long time. Usable and Iconic can go together.. Make is safe for motorized vehicles and human powered vehicles along with pedestrians. This is a geographically beautiful region. Please give a bridge that responds to the natural beauty and shows the world what human engineers can make to last a long time.

JCA comment #: 568

IBR Draft SEIS - RECORD #2738 DETAIL

First Name :	Melissa
Last Name :	Kostelecky
Attachments :	DSEIS_2738_Kostelecky_Original.pdf (4 kb)

IBR Draft SEIS - RECORD #2738 DETAIL

Submission Date : 11/17/2024
First Name : Melissa
Last Name : Kostelecky
Business/Organization/Agency :

Submission Input :

First Name:
Melissa

Last Name:
Kostelecky

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
As a citizen concerned about the economy, climate, and our children's future, we must recognize that a project like this needs to account for the future needs of our transportation system with regard to adaptability, safety, public health and transportation choice. Freeway expansion that treats public transit, biking and walking as afterthoughts fails to meet the needs of all transportation modes and will lock us into decades of expensive, inflexible and unsustainable automobile dependency. This dependency will only serve to further burden our

economy with maintenance expenses, and additional retrofitting costs if/when we realize decades down the road that we failed to build the kind of multimodal bridge that has long benefitted users in Europe and Asia.

Please ensure that this project not only allows for public transit, biking and walking, but prioritizes these modes in a way that truly incentivizes behavioral shift. If a bridge is intended to move SOV drivers through at 60 mph but still takes transit users an hour to travel the 9 miles between downtown Vancouver and downtown Portland, do we really believe models claiming that induced demand will not apply here? With the rise of e-bikes, potential bike users could in theory have a commute of less than 40 minutes, but this will not happen if their route is indirect, noisy, dangerous and hostile.

Please ensure that this bridge prioritizes the safety and comfort of those choosing lower-impact modes of travel over the speed of SOVs. This means less money and road space dedicated to auxiliary lanes, and more to dedicated bus and rail lanes as well as bike and pedestrian paths fully separated from vehicle and freight traffic.

Thank you,
Melissa Kostelecky
MS, Environmental Policy and Management

JCA comment #: 566

IBR Draft SEIS - RECORD #2740 DETAIL

First Name :	Janna
Last Name :	Tessman
Attachments :	DSEIS_2740_Tessman_Original.pdf (3 kb)

IBR Draft SEIS - RECORD #2740 DETAIL

Submission Date : 11/17/2024
First Name : Janna
Last Name : Tessman
Business/Organization/Agency :

Submission Input :

First Name:
Janna

Last Name:
Tessman

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
The I 5 bridge replacement proposal needs to improve. The DSEIS does not provide sufficient justification for a second auxiliary lane.
Prioritizing a streamlined project focused on bridge replacement, transit enhancements, and active transportation—without extensive freeway expansion—would be more beneficial and cost-effective.

JCA comment #: 564

IBR Draft SEIS - RECORD #2742 DETAIL

First Name :	Alex
Last Name :	Haupt
Attachments :	DSEIS_2742_Haupt_Original.pdf (3 kb)

IBR Draft SEIS - RECORD #2742 DETAIL

Submission Date : 11/17/2024
First Name : Alex
Last Name : Haupt
Business/Organization/Agency :

Submission Input :

First Name:
Alex

Last Name:
Haupt

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Environmental Justice

Comment:
Active transport infrastructure will not in actuality reduce emissions or traffic congestion if heat and safety (actual or perceived) make it unusable for the average person. If these issues cannot be fixed, the impact analysis should not take credit for hypothetical benefits.

JCA comment #: 562

IBR Draft SEIS - RECORD #2744 DETAIL

First Name :	Jay
Last Name :	Rood
Attachments :	DSEIS-2744_Rood_Original.pdf (38 kb)

IBR Draft SEIS - RECORD #2744 DETAIL

Submission Date :	11/17/2024
First Name :	Jay
Last Name :	Rood
Business/Organization/Agency :	Rood Art Works Northwest LLC.

Submission Input :

Public Testimony for the IBR Draft Supplemental EIS – November 18, 2024

Submitted by Jay Rood and Evan Rood, Rood Art Works Northwest LLC. [redacted]

Thank you for this opportunity to submit our comments on the IBR Program Draft Supplemental EIS (SEIS), September 20, 2024. Our interests in testimony stem from the effects that the IBR's Modified Locally Preferred Alternative (LPA) will have on Downtown Vancouver's Columbia River shore "Bridges Landing Zone" and specifically on the impacted Captain George Vancouver Monument (CGV Monument) and all its highly valued community resource elements, Including: Boat of Discovery Public Art/Sculpture, Monument Park Plaza, Wave Walls Plaza; Monument Interpretive and Dedication Panel, recreation Gateway/Trail head to the Columbia River Renaissance Trail and Discovery Historic Loop Trail and Landscape plantings. These resources require comprehensive and accurate Section 4(f) evaluation at the very least.

THE IMPACTED RESOURCE

The Captain George Vancouver Monument (CGV Monument) was dedicated on October 30, 1992, as the capstone of the City's namesake Bicentennial (200 year) Celebration (The Monument is now 32 years old – by the time the IBR Program is built it will be 45 to 50 years old). This significant historic marker, landmark and urban park space are not just valued by the local City of Vancouver community, but also more broadly at the statewide and national levels. The iconic Boat of Discovery sculpture, Concrete and Stone Columns, Steel boat and Monument Plaza/Park wave walls, paving and plantings can be found in online and print literature and infographics from the City of Vancouver's Cultural, Art and Culture Plans, Public Art inventory and Public Art walking maps, including in State Trail and Cultural interpretive programs, the National Park Service Discovery Loop Trail and the National Historic Marker and Library of Congress registrations. The CGV Monument/Park/Plaza and Boat of Discovery are also an integrated part of other recreational, historic, and interpretive resources/facilities, including: the Columbia River Renaissance Trail (Waterfront Trail) and Discovery Historic Loop Trail – both highly used recreational, interpretive and public access systems.

The CGV Monument/Park/Boat of Discovery/Plaza were designed, built and installed by Jay Rood, artist. Mr. Rood was selected in 1992 by the CGV Monument Committee – requiring the monument be designed for and located specifically in its (current) south Columbia Street/Columbia River edge location. Furthermore, these Park, trail and art facilities were funded by local, private and Rotary Club donations, City of Vancouver Capital Improvement Program resources, and State of Washington and National Park Services grants (federally funded Discovery Historic Loop Trail, 2008).

The Captain George Vancouver Monument/Park/Boat Discovery Public Art/Sculpture and associated recreational and interpretive trail and art elements are managed under the City of Vancouver's Parks, Recreation and Cultural Services Department (VRPDC); Culture, Arts & Heritage Commission; and City of Vancouver Parks Facilities Maintenance. Both the CGV Monument and Renaissance Trail are within a Park (0.4 acres) and Public Right-of Way (Columbia Street and Columbia Way).
[image: page1image44184512]

Impacted Resources Delineated/Confirmed in FEIS and in SEIS:

The authors have reviewed both the former CRC FEIS/ROD, 2011 and the current IBR Program SEIS, 2024 and have made a record of this review along with response notes – see Appendices: A - FEIS and B – SEIS records attached to this comment document.

In the FEIS – CRC LPA Effects:

There are three sets of impacted resources found within the FEIS that identify, describe and evaluate the CGV Monument/Park/Boat Discovery Public Art/Sculpture and associated recreational and interpretive trail and art elements.

1.

Waterfront Park (CGV Monument/Boat of Discovery Monument/Waves Plaza); Community/Neighborhood Park; 0.4 acres (18,730); VCPRD; local, City, regional, state and federal funding (Via both the renaissance trail and Discovery Historic Loop Trail)- Waterfront Park was funded thru the Waterfront Renaissance project.

2.

Waterfront Renaissance Trail (Columbia River Renaissance Trail); 450 linear feet within bridge impact zone; VCPRD; City of Vancouver, State of Washington (potential federal funding pass thru – requires investigation)
3.

Discovery Historic Loop Trail: 2.8 miles - 450 Linear feet – (as part of Renaissance Trail and Waterfront Park); VCPRD/NPS; funding City of Vancouver and federal funding (part of 2008 Confluence Project) *.
*Note: Should have triggered Section 106, 6(f) of the National Historic Preservation Act of 1966, as amended – 16 U.S.C. 470f Evaluation but did not under 36 CFR Part 800 – Protection of Historic Properties.

In the IBR SEIS – IBR M LPA Effects:

There are three sets of impacted resources found within the SEIS that identify resources related to the CGV Monument/Park/Boat Discovery Public Art/Sculpture – BUT DO NOT INCLUDE OR STATE ANY ASSOCIATION, CONNECTION, OR IMPACT to these CGV Monument+ resources (with exception of trails citiation in Parks and Receation Technical section: Draft Section 4(f) Evaluation – 4-7).

1.

Columbia River Renaissance Trail (renamed from Waterfront Renaissance Trail - FEIS) (part of Discovery Historic Loop Trail); Multiuse trail; Columbia Way; VPR& C; 5.0 Mile, 14-foot-wide multiuse paved trail starting at the intersection of Columbia Way and Columbia Street and traveling east to Marine Park and Wintler Park. – permanently displaces 1,000 linear feet –underneath new Columbia River Bridges (realigns along new Columbia Way); VCPRD; City of Vancouver, State of Washington (potential federal funding pass thru – requires investigation).
2.

Discovery Historic Loop Trail “(includes portion of Waterfront Trail); Multiuse Trail and City sidewalks; Columbia River Waterfront, Fort Vancouver National Historic Site, Downton Vancouver; VPR&C/NPS; 2.3 miles trail on paved multiuse paths and local streets. - 450 Linear feet impacted – (as part of Renaissance Trail and Waterfront Park); VCPRD/NPS; funding City of Vancouver and federal funding (part of 2008 Confluence Project) *.

[image: page2image44257216] [image: page2image44263360][image: page2image44261824] [image: page2image44262400] [image: page2image44266432][image: page2image44266240] [image: page2image44260288][image:

page2image44262592] [image:
page2image44268544][image: page2image44265280]

*Note: Should have triggered Section 106, 6(f) Evaluation but did not.

3. Fort Vancouver National Historic Site; Includes a National Historic Site, Historic District; Between Columbia River and Mill Plain Boulevard; NPS; Waterfront Park**, which NPS manages as part of the Fort Vancouver NHS, includes passive recreation, and viewing opportunities for the Columbia River and is crossed by the Columbia River Renaissance Trail.
**Note: SEIS describes, Table 3.7-4, “Approximately 0.4 acres permanently acquired” -? What 0.4 acres? Why is acquisition needed?

WHAT’S AT STAKE - COMMENTS

We have reviewed both the CRC FEIS, 2011 and IBR Program SEIS, 2024 (see the review/record) for each in the Appendices A & B) and the following comments:

Central Concern

Although, the Captain George Vancouver Monument/Park & Boat of Discovery Public Art resources are evaluated in the CRC FEIS, they are OMITTED from the IBR Programs’ SEIS.

The Captain George Vancouver (CGV) Monument was recognized in the 2011 Final EIS (FEIS) as a City Park and cultural resource worthy of consideration for impact and mitigation – Parks and Recreation 4(f) Evaluation as part of any future CRC development. However, in the 2024 IBR Draft Supplemental EIS (DSEIS), the Monument and associated greater waterfront park is NOT identified and, as such, is subject to removal and demolition without the benefit of evaluation of and/or of mitigation associated with the IBR Program Modified LPA. The DSEIS also fails to note that the location of the CGV Monument is in a city right-of-way that contains a Vancouver City Park, the CGV Monument (.4 acres – 18,730 Square Feet). Located along Columbia Street on the west side of the Columbia River Bridge and part of the Columbia River Renaissance Trail (45°37.307' N, 122° 40.434' W).

More Detailed Description of Modified LPA Facilities

The IBR Program’s Locally Approved Alternative and the CRC Locally Approved

Alternatives have very similar alignments and dimensional characteristics and associated impacts on CGV Monument, Boat of Discovery and Waterfront Park. Both are designed to the west of the existing I-5 Bridge and “land” diagonally over the City of Vancouver/Columbia Shore at Columbia Street and Columbia Way. A difference is the IBR proposal is an elevated set of structures going over the railroad berm- while the CRC proposal was to continue under the railway bridge.

The issue is, with both the FEIS and SEIS, that the LPA facilities: I-5 Bridges, Shared Use Ramp, Light Rail are not described with enough detail to adequately evaluate short-term/long- term effects and mitigation on this critical Downtown Vancouver (Subarea C) landing zone (where all these facilities converge on/over the Waterfront Park/CGV Monument resources). The SEIS evaluation requires much more specific definition of alignment, supporting structures, elevations, length of ramps, size/scale of columns; construction requirements (demolition, utilities, staging access).
[image: page3image44256256] [image: page3image44267584][image: page3image44257024][image: page3image44268352] [image: page3image44258176][image: page3image44265664]

Especially impactful on the Waterfront Park/CGV Monument is the Shared Use Looped Ramp (again no detail on scale, elevation change, structure, landing points). An alternative to this facility should be developed – i.e....pedestrian, bicycle, and accessible facility associated with the light rail line and station be examined). This shared use facility has a large impact on the CGV Monument/Waterfront Park landing zone and estimate it will at a significant cost to construct and operate.

More Detailed Information Needed on Acquisitions, Easements, Displacements and Land Use Agreements
Both the FEIS (Exhibit 3.7-5; narrative, page 3-198; Table 3.7.3; Table 3.7-4; Exhibit 3.7-12; narrative, pages 3-207 to 3-208; Exhibit 5.2-4; Exhibit 5.3-1; Exhibit 5.3-9; and Exhibit 5.6.1) and SEIS (Table 3.7-1; Table 3.7-2; Table 3.7-2; Table 3.7.3; Table 3.7-4; narrative, pages 3.7-16; and figure 4-1 & 4-3) describe permanent use and acquisition or realignment of facilities in this IBR landing zone area, including Waterfront Park (0.4 acres), and realignment of Renaissance and Discovery Historic Loop Trails.

Need more specific information on short-term and long-term public right-of way/property acquisitions, transfers, easements, leases, displacement and

other land use agreements and the basis for them. Evaluation should be based on fully understanding the complex pattern of properties and encumbrances in this important landing zone of IBR Program facilities (need full survey and property descriptions of existing conditions (boundaries to facilities, grades, trees...). Some specific ROW/Properties/Easements/Leases/Agreements requiring more detail:

-

City of Vancouver Park(s)
-

City of Vancouver Street Right-of-Way
-

State of Washington DOT Right-of-Way
-

Columbia River – Limits and jurisdictions
-

BNSF Rail Line
-

National Park Service – Fort Vancouver NHS & Waterfront Park
-

Port of Vancouver – (Which is shown as planning a shoreline line access to the CGV

Monument/Waterfront Park)
-

Clark County
-

Utilities – Gas, Water, Power, Storm drainage, Sewer
-

Kirkland Development – (which is shown as expanded over Columbia Way Right-of-

Way)
-

Other public or private development not discovered

For these acquisitions, transfers, easements, leases, displacement and land use agreements there are very few descriptions as to why they need to occur or what undertakings drive these decisions? – This background will be needed to adequately assess any such acquisition, displacement or realignment effect.

CGV Monument Parkland: We see 0 .4 acres of parkland being permanently acquired in the FEIS (in 7 FEIS document locations) but nothing in the SEIS (with exception of Table 3.7-4 Comparison of Long-Term Effects on Parks and Recreation facilities from the Modified LPA Options Chart, pages 3.7-9 to 3.7.12, Fort Vancouver NHS: Approximately 0.4 acres

[image: page4image44257600] [image: page4image44259328] [image: page4image44265856][image: page4image44267200]

permanently acquired (What property and where located? Acquired for what reason?). The purpose of this 0.4 acres of parkland acquisition is not explained in any section – other than in a long-term effects context.

Waterfront Trail: abandonment/displacement of 450 linear feet of Renaissance Trail within the IBR landing zone (under the bridges along the shore) and realign along a new Columbia Way. Again, no description as to why no 4(F) effects.

Discovery Historic Loop Trail: abandonment/displacement of 450 linear feet of the Discovery Historic Loop Trail (associated with Waterfront Trail above) within the IBR landing zone (under the bridges along the shore) and realign along a new Columbia Way. Again, no description as to why no 4(F) effects.

Other: Port of Vancouver, Fort Vancouver National Historic Site (Waterfront Park) and private development (Kirkland Development) land use, property, access agreements have been prepared in some form: Provide all agreements, MOA/MOUs, that impact these CGV Monument/Park and associated trail resources for evaluation.

Need Confirmation in Both FEIS and SEIS that the Monument is a PARK: While the original FEIS Record of Decision does provide recognition of the Monument as a City Park - as part of not only Vancouver Waterfront Park but

also the Columbia River Renaissance Trail (Waterfront Renaissance Trail); as confirmed in the INTERSTATE 5 COLUMBIA RIVER CROSSING Parks and Recreation Technical Report for the Final Environmental Impact Statement, May 2011 – Exhibit 3-3 and 3-4. In addition, the FEIS designates impacted Waterfront Park (0.4 acres), the Waterfront Renaissance Trail, and Discovery Historic Loop Trail as Section 4(f) taking.

All Waterfront Park, Renaissance Trail and Discovery Historic Loop Trail resources are Recreation assets and Require Section 4(f) Evaluation:
In hugely confusing and stark contrast from the FEIS (includes Section 4(f) Evaluations – stating (f) use, impact and mitigation), the IBR Program DSEIS (Draft), is declaring that these Park and Trail resources are not recreation – but solely transportation and thus not subject to Section 4(f) evaluation* (Contradictory). This assertion is not well supported by either the findings of the FEIS but also of 32 years of historic use as park and recreation resources; City of Vancouver park and recreation programing and maintenance; and along with the many other regional, state and national recognition of these iconic recreational, cultural, view and art resources. Not to mention the hundreds of thousands of families, visitors, and tourists that use these facilities all year round.

As stated in Section 4(f), these resources would apply to a publicly owned, shared-use path or similar facility (or portion thereof) designated or functioning primarily for recreation...” (FHWA 2012). While considered in the CRC FEIS Section 4(f) Evaluation, because the affected portion of trail is located within public right of way that is a sidewalk and functions primarily for an active transportation purpose connecting to and between downtown Vancouver, the Vancouver waterfront, and several parks in the region, and the trail would remain as a sidewalk after construction, the Columbia River Renaissance Trail is not subject to Section 4(f) (Draft Section 4(f) Evaluation | 4-17).”
[image: page5image44269120] [image: page5image44265088] [image: page5image44268160] [image: page5image44247168][image: page5image44248896][image: page5image44252736][image: page5image44250816][image: page5image44251968] [image: page5image44241408][image: page5image44252352]

The confusion may rest with the fact that the Monument/Park is part of the Columbia Street/Columbia Way right-of-way! However, in the Draft Section 4(f) Evaluation | 4-5 Supplemental 4.1.5 Summary of 2011 Final EIS Section 4(f) Findings Where details of the CRC Final Section 4(f) Evaluation for a

given property are still relevant and accurate, they have been included to support the DEIS Section 4(f) Evaluation for the IBR Program.

Visual Arts Rights Act (VARA) – Rights Afforded Jay Rood Under the Act to Protect the Captain George Vancouver Monument/Sculpture
As the artist who created the CGV Monument / Boat of Discovery Sculpture, Mr. Rood and his work are entitled to protection under the Visual Artists Right Act (VARA) of 1990. Under VARA, Mr. Rood has the right to prevent any intentional distortion, mutilation, or other modification of the CGV Monument / Boat of Discovery Sculpture as well as its intentional destruction. Mr. Rood did not waive/has not waived his rights under VARA and has not provided his permission for any IBR Program facility impacts to his work. The IBR Program SEIS Evaluation needs to record this condition in its ongoing environmental analysis, record and determinations and identify a means, a role and a schedule for Mr. Roods inclusion into this IBR Program development process.

Mr. Rood believes, and can demonstrate, that the CGV Monument/ Boat of Discovery and related Renaissance/Discovery Historic Loop Trails can be:

1) Protected in-place with careful design and structuring of IBR bridge, light rail and shared use path structures (protect during construction); or

2) If construction and other infrastructure improvements require temporary displacement/removal/storage, then these resources can be/must be rebuilt in the same locations and manner.

This design and mitigation response can also make Port of Vancouver, Waterfront Renaissance Trail, new Columbia Way, Columbia Street and Main Street connections – all focused on the Columbia River shore while expanding/extending the world-class shoreline park to the west and east of this circulation, historic, recreational, orientation, interpretive “HUB” (a new Waterfront Park). But these actions must be more carefully examined, planned, designed and implemented for this extraordinary “landing/HUB” river edge, park and recreation landscape to be a viable public space with the CGV Monument at its center.

IBR SEIS Draft Document is Inadequate, Incomplete and Contradictory Document:

Within the DSEIS there are numerous conflicting resource identifications, lack of detailed mapping, inadequate descriptions of facility impact, lack of comprehensive acquisition accounting, and lack of underlying impacts definition and therefore of mitigation response.

Captain George Vancouver Monument/Plaza and Boat of Discovery Require Protection

These contradictions and conflicts between the FEIS and the IBR DSEIS should be reconciled, and the Monument and related resources be correctly protected through the various methods and means for protection in accordance with 23 CFR 774.13(f), and as per Question 15A of the Section 4(f) Policy Paper. The SEIS requires a more comprehensive evaluation of impacts and associated mitigation related to these park and recreation resources.
[image: page6image44252160] [image: page6image44245248] [image: page6image44251776][image: page6image44244288][image: page6image44241792] [image: page6image44249280] [image: page6image44249472][image: page6image44297472]

These comments are directed at the CRC FEIS, 2011, and IBR SEIS, 2024, only and do not constitute support for or approval of the IBR Program and its Modified Locally Approved Alternative.

Question: What is schedule for comment response and development of the Draft IBR Program FEIS?

Thank you!
Jay Rood Evan Rood

Rood Art Works Northwest LLC [redacted]
[redacted]
[image: page7image44300160]

APPENDIX A: CRC FEIS, 2011, REVIEW

2011 FEIS (Record of CGV Monument & Boat of Discovery)

The CRC FEIS extensively records, existing conditions, impacts and mitigation associated with the Captain George Vancouver Monument, Boat of Discovery, Waterfront Park; Wave Wall Plaza; Waterfront Renaissance Trail, Discovery History Loop Trail. The FEIS establishes this resource a Section 4(f) resource.

CHAPTER 3

Existing Conditions and Environmental Consequences Parks & Recreation Section

3.7.2 -

Exhibit 3.7-1, Parks and Recreation Facilities in the CRC Main Project Area

Existing parks and recreation facilities, Map:
Waterfront Park (CGV Monument Park); Waterfront Renaissance Trail; and Discovery Historic Loop Trail page 3-191

Exhibit 3.7-2 Parks and Recreation Facilities – Location, Jurisdiction and Amenities –

Chart, Page 3-192

Waterfront Renaissance Trail (Part of Discovery Loop Trail); Multi-use trail; Section 4 (f) impact (Use); VCPRD; Columbia Way; 14 ft wide shared use concrete trail.

Waterfront Park; Community Park; Section 4(f) Impact (Use); Columbia Way; VCPRD; Recreational par shoreline, public plaza/view areas, Boat of Discovery Monument

Exhibit 3.75 – Long-term Effect 0n Parks and Recreation Resources (LPA) –

Chart, pages 3-197 & 3-198

Discovery Historic Loop Trail (includes portion of Waterfront Trail); .4 acre of parkland permanently impacted; realignment of up to 450 linear feet of trail (portion that overlaps the Waterfront Trail); LPA Section 4(f) impact – Use

Waterfront Renaissance Trail (part of Discovery Historic Loop Trail); Realignment of up to 450 Linear feet of trail underneath existing and new I-5 bridge landing (See Discovery Historic Loop Trail Above); LPA Section 4(f) impact – Use.

Waterfront Park: 0.4 acre of parkland permanently acquired; displacement of Waves Plaza and Boat of Discovery Monument; LPA Section 4(f) impact – Use.

Exhibit 3.7-6, Permanently Impacted Portion of Waterfront Park

Photo, page 3-198
Shows photo of Monument - looking south

Associated narrative, page 3-198 “Project effects on Vancouver’s Waterfront park are likely the most substantial of all park impacts, although these are not the largest property impact. The LPA would permanently acquire the entire portion of the park that falls west of I-5 for construction of the replacement bridges. This 0.4-acre portion of the park, seen in Exhibit 3-17-6, is the west end of Waterfront Park the Waterfront Renaissance Trail that extends along the Columbia River east of I-5.

8|Page
[image: page8image44291520][image: page8image44302080][image: page8image44296896] [image: page8image44301888] [image: page8image44298240] [image: page8image44289024][image: page8image44291328]

The construction of the bridges at this location would displace the Waves Plaza and Boat of Discovery Monument, as well as trees and plantings surrounding and within the plaza. The Area beneath the existing I-5 Bridges would be vacated by WSDOT after bridge demolition, and then transferred to the City to use as part of their Waterfront Park redevelopment. See description in Chapter5, Final 4(f) Evaluation.”

Impacts/Effects Narrative, Pages 3-199 - 3-201
Discusses bicycle and pedestrian connections – “...benefiting Waterfront Trail, Waterfront park...”; and highway noise impacts increased due to construction on Waterfront Trail and Waterfront Park areas.

3.7.5 Mitigation or Compensation
Exhibit 3.7-12, Waterfront Park and Trail Beneath Existing I-5 Bridges

Photo, Page 3-208
Associated narrative discussing long-term impacts mitigation: Page 3-207 - 3-208

“The acquisition of a portion or Waterfront Park and the displacement of the park improvements, including the Boat of Discovery Monument, Waves Plaza and other improvements, would be mitigated through a land transfer, relocation of Boat f Discovery Monument, and other improvements for the park as described in Chapter 5, Final Section 4(f) Evaluation. The project is coordinating with the City of Vancouver to utilize vacated state right-of-way beneath the existing I- 5 bridge landings in Vancouver. Tiis

area would be incorporated into the City's planned expansion of Waterfront Park (Exhibit 3.7-12). In addition, WSDOT would provide the City with use of Portions of the land under the new bridge for park and recreation use. The project would also relocate and rebuild Waterfront Trail.

...mitigation for trees removed at Waterfront Park...impacted trees would be replanted in the same or similar locations as the trees are removed depending on the location of the original tree in relationship to the new highway location...."

CHAPTER 5
Final Section 4(f) Evaluation

Exhibit 5.2-1, Summary Information about Section 4(f) Park and Recreation Resources in the Project Area,
Chart, Page 5-5

Waterfront Renaissance Trail; Multi-use Trail (part of Discovery Historic Loop Trail); Columbia Way; COV & National Park Service; 4-mile-long multi-use trail along Vancouver Waterfront; connects to Fort Vancouver and Old Apple Tree Park via the Confluence Land Bridge.

Waterfront Park; Regional Park; Columbia Way, Vancouver, WA; COV/NPS; 5 acres; passive recreation and viewing; including Captain Vancouver Monument and IIchee Status and starting point of the Waterfront Renaissance Trail.

Exhibit 5.2-3, Section 4(f) Parks and Recreation Resources: Project Area

Map, Page 5-6
[image: page9image44070592][image: page9image44061184] [image: page9image44062528][image: page9image44057536][image: page9image44064832]

1 – Waterfront Renaissance Trail 2 - Waterfront Park

Exhibit 5.2-4, Section 4(f) Parks and Recreation Resources: Project Area

Map/Photo Insert, Page 5-8
1 and 2 – Waterfront Renaissance Trail and Waterfront Park
4(f) Use – Permanent acquisition of parkland (0.4 acres), displace Boat of Discovery Monument and plaza, realign 450 lineal feet of trail.

5.2.4 The Vancouver National Historic Reserve (VNHR)

Narrative, page 5.22

The following recreational and historic built environment resources or facilities are associated with the VNHR in part or in whole and are located near the CRC project improvements:

• Discovery History Loop Trail

5.3.3 Section 4(f) Uses by the Locally Preferred Alternatives

Exhibit 5.3-1, Use of Park and Recreation Section 4(f) Resources

Chart, Page 5-27

LPA A or B; Waterfront Renaissance Trail; Paved Multimodal public path; permanently realigns approximately 450 Linear feet of trail underneath existing and future proposed I-5 bridges. Based on CFR 774.17, a Section 4(f) use.

LPA A or B; Waterfront Park; Recreational Park shoreline and public plaza/view areas; Acquires .4 acres (18,730 sq. ft.) of park land; displaces plantings, waves plaza, and Boat of Discovery Monument. Based on CFR 774.17, a Section 4(f) use.

5.6.1 Factor (i) Ability to Mitigate Adverse Impacts to Section 4(f) Resources, Including Any Measures that Result in Benefits

The LPA (and Alternatives 2 and 3) Narrative, Page 5-87

Other Section 4(f) mitigation measures incorporated into the LPA include the Following:

-

Realign and rebuild Waterfront Trail in coordination with the City of Vancouver’s on-going planning to redevelop and expand Waterfront Park.

-

Provide improved access, use of right-of-way for ball courts and other recreational activities, site re-grading, vegetation and other improvements to help the City of Vancouver implement its proposed Waterfront redevelopment.

Exhibit 5.3-9, Waterfront Renaissance Trail and Waterfront Park

Map, Page 5-41
Map shows acquisition boundaries:

“Waterfront Park – As illustrated in Exhibit 5.3-9, the new I-5 bridges over the Columbia River would travel over the portion of Waterfront Park located on the west side of the existing I-5 bridges. This portion of the park, which is in the City of Vancouver right-of -way adjacent to

[image: page10image44061760] [image: page10image44069824][image: page10image44060416] [image: page10image44065216][image: page10image44063104][image: page10image44070016]

Columbia Way, acts as the entrance to the larger Waterfront Park and Waterfront Renaissance Trail, and includes a plaza and public art. The project would permanently acquire this entire area, approximately 0.4 acres, and displace the Boat of Discovery Monument and Waves Plaza. This permanent property acquisition constates 9Percent of the 5-acre Waterfront Park and would constitute a Section 4(f) use.”

“Waterfront Renaissance Trail (part of the Discovery Historic Loop Trail) – The Waterfront Renaissance Trail is located in Waterfront Park, Columbia Way on the Vancouver riverfront. As illustrated in Exhibit 5.3-9, approximately 450 feet of the trail would be realigned due to the construction of the new I-5 bridges and demolition of the existing bridges. This length of impacted trail constitutes less than 5 percent of the existing Waterfront Trail and would constitute a Section 4(f) use.

Access to this trail from I-5 - ... The LPA would include a new multi-use path within the northbound I-5 bridge, which would connect to Waterfront Park and Trail via a looped path that would travel underneath the bridges..."
[image: page11image44072512]

APPENDIX B: IBR PROGRAM DSEIS, 2024, REVEIW

Interstate Bridge Replacement Program – Draft SEIS, September 20, 2024

The September 20, 2024, SEIS anlayis of the Preferred Locally Proposed

Alternative does not address, evaluate or record any aspect of the Captain George Vancouver Monument, Boat of Discovery, Wave Wall Plaza or Waterfront Park that it is a part of - with the exception of the Waterfront Renaissance Trail.

Figure 3.3-3 Detail of Property Acquisitions in Downtown Vancouver
Does not Identify Waterfront Park
Entire area under/around bridge landing is shown as “Permanent Impact Footprint”? No delineation of park land acquisition (says 0)

5-12 – Summary – what are the effects of the Modified LPA

Table 4, Summary of Mitigation or Compensation for Community and Environmental Effects

Page S-36

Parks and Recreation

Long – Term Effects
There is NO description of effects on Waterfront park, George Vancouver Monument/Boat of Discovery.
Impacts on trees and landscape are discussed.

Visual Quality

Long – Term Effects
There is NO description of effects on Waterfront park, George Vancouver Monument/Boat of Discovery.
General Mitigation
Vancouver Downtown Landscape Unit
Not directed to Monument/Boat of Discovery – directs follow design guidelines; provide landscaping, public art, and other treatments

Section 4(f) Resources

Page S-59
Comply with CFR 774.17 (Which this SEIS is not)
States, “No program specific measures are proposed for long-term or temporary effects related to Section 4(f) resources beyond those prosed in Parks and Recreation” (see above – only trees and landscape)

2.2.4 Downtown Vancouver (Subarea C)

Highways, Interchanges and Local Roadways
Figure 2-23, Downtown Vancouver (Subarea C) and Narrative
Pages, 2-38, 2-39 Chapter 2
Map shows proposed IBR Program facilities: new I-5 bridges, light rail line/station and circular shared use path off of bridges to Columbia Street/Columbia Way. Does NOT show existing Waterfront Park (Captain George Vancouver Monument/boat of Discovery Sculpture Plaza/Park). Shows a realigned Columbia Way – but with no description
[image: page12image44060224] [image: page12image44069632] [image: page12image44071744][image: page12image44059648] [image: page12image44071360]

A light-rail station is described as 35’ - crossing over the BNSF railroad tracks – be 75’ above existing ground level – accessed by stairway(s) and elevator(s)

3.7 Parks and Recreation
Table 3.7-1. Comparison of CRC LPA Effects and IBR Modified LPA Effects

Chart, page 3.7-1

Total Acres of Park and recreation resources acquired:
CRC LPA – 4 Acres
IBR MLPA - .08 Acres
Reduction in total acres acquired is primarily the result of reduced impacts to Fort Vancouver National Historic Site, waterfront Park, Discover Historic Loop Trail and Clark College.

Note: There is NO mention of the CGV Monument, Boat of Discovery, Monument Park/Plaza....

Figure 3.7-1 Parks and Recreation facilities in the Study Area

Map, Page 3.7-3
Shows generalized locations of parks, including Waterfront Park, Waterfront Renaissance Trail and Discover History Loop trail

Table 3.7-2 – Parks and Recreation facilities – Location, Jurisdiction and Amenities

Chart, page 3.7-5

Columbia River Renaissance Trail (part of Discovery Historic Loop Trail); Multiuse trail; Columbia Way; VPR& C; 5.0 Mile, 14-foot-wide multiuse paved trail starting at the intersection of Columbia Way and Columbia Street and traveling east to Marine Park and Wintler Park.

Fort Vancouver National Historic Site; Includes a National Historic Site, Historic District; Between Columbia River and Mill Plain Boulevard; NPS; Waterfront Park, which NPS manages as part of the Fort Vancouver NHS, includes passive recreation, and viewing opportunities for the Columbia River and is crossed by the Columbia River Renaissance Trail.

Discovery Historic Loop Trail (includes portion of Waterfront Trail); Multiuse Trail and City sidewalks; Columbia River Waterfront, Fort Vancouver National Historic Site, Downton Vancouver; VPR&C/NPS; 2.3 miles trail on paved multiuse paths and local streets.

Note: There is NO mention of the CGV Monument, Boat of Discovery, Monument Park/Plaza....

Table 3.7.3 Long Term Benefits and Effects - MLPA

Chart, pages 3.7-7, 3.7-8

Columbia River Renaissance Trail (co extensive with Discovery Historic Loop Trail along affected portion).

-

Realignment of up to 1,000 linear feet of the trail underneath new Columbia River bridges landing (see Discovery History Loop trail below).

-

Traffic Noise to slightly decrease 13 | P a g e

[image: page13image44051136] [image: page13image44045952][image: page13image44053248] [image: page13image44043456][image: page13image44044032]

Table 3.7-4 Comparison of Long-Term Effects on Parks and Recreation facilities from the Modified LPA Options
Chart, pages 3.7-9 to 3.7.12

Discovery Historic Loop Trail (includes portion of Columbia River Renaissance Trail):

-

Realignment of up to 2,750 Linear feet of trail (1,000 linear feet overlaps with Columbia

River Renaissance Trail)
-

Improved Visitor experience from new and improved intersections, sidewalks and bicycle

lanes in Downtown Vancouver portion

Fort Vancouver NHS.

-

Approximately 0.4 acres permanently acquired (WHAT 0.4 ACRES ACQUIRED? – SEIS SAYS

0.0 ACRES ACQUIRED?)
-

Traffic Noise could increase
-

At waterfront Park, changes in in western and southern views due to new Columbia River

bridges.

Narrative, Page 3.7-16

Columbia River Renaissance Trail

-

Permanently realign 1,000 linear feet
-

M LPA would include a multiuse path that would extend underneath the

northbound

Columbia River Bridge and connect directly to the trail along the realigned Columbia Way

Discovery Historic Loop Trail.

• Would permanently realign up to 2,750 Linear feet of trail (1,000 linear feet overlaps with

Columbia River Renaissance Trail)

4. DRAFT SECTION 4(F) EVAULATION
4.2.1 Section 4(f) Park and Recreation Properties in the IBR Program Study Area

Table 4-1. Summary Information about Section 4(f) Park and Recreation Properties in the IBR Program Study Area
Chart, pages 4-8 to 4-10

The chart has no information regarding Waterfront Park, Captain George Vancouver Monument, Boat of Discovery, Wave Wall Plaza or any other related element.

It also does not describe any properties associated with the Columbia River Renaissance Trail, Discovery Historic Loop Trail or National Park Services Waterfront Park/Waterfront Renaissance Trail (along the Columbia River – south of Columbia Way).

Figure 4-1, Section 4(f) Park and Recreation Properties: IBR Study Area

Map, page 4-11
Delineates IBR study area – but although the Waterfront Park, Captain George Vancouver Monument, Boat of Discovery, Wave Wall Plaza or any other related element sits within the study area – no designation is shown.

An inset map does designate the Waterfront Renaissance Trail as part of the Fort Vancouver National Historic Site boundary. Shown here but not delineated in Table 4-1.?

[image: page14image44096832] [image: page14image44102784] [image: page14image44095104][image: page14image44084288] [image: page14image44082176][image: page14image44117248][image: page14image44111104]

Figure 4-3. Section 4(f) Park and Recreation Properties: Fort Vancouver National Historic Site
Map, page 4-13

Shows graphically, that the renaissance trail thru the Waterfront Monument Park is realigned – now wholly along a new aligned Columbia Way connecting to Columbia Street and Port development to the west. Also, a circular looped pathway is shown off of the new IBR bridges connecting to Columbia Street/Columbia Way intersection.

Columbia River Renaissance Trail (Formerly referred to as Waterfront Renaissance Trail (? When did this change? By whom?)
Narrative, page 4-17
“The Columbia River Renaissance Trail is a 5-mile long, 14-foot-wide multiuse paved trail starting at the Intersection of Columbia Way and Columbia Street and extending east... Connects Vancouver Downtown to the Columbia River Waterfront... The Columbia River Renaissance Trail is a portion of Discovery Historic Loop Trail (NPS – Federally Funded?) and connects to the FVNHS. The portion of the trail in the study area is designated along the public sidewalk on the southside of Columbia Way. After construction is complete, the trail and Columbia Way would be realigned and reconstructed. The new constructed portion of trail would continue to be located in City of Vancouver right-of-way for Columbia Way.

In accordance with 23 CFR 774.13(f), and as per Question 15A of the Section 4(f) Policy Paper, “section 4(f) would apply to a publicly, shared use path or similar facility (or portion thereof designated or functioning primarily for recreation...” (FHWA 2012). While considered in the CRC Final 4(f) evaluation, because the affected portion of the trail is located within public right-of-way and functions primarily for an active transportation purpose connecting to and between downtown Vancouver, The Vancouver Waterfront, and several parks in the region, and the trail would remain as a sidewalk after construction, The Columbia Rover Renaissance Trail is not subject to Section 4(f).”

Discovery Historic Loop Trail

Narrative, page 4-17

“The Discovery Historic Loop Trail is a 2.9-mile trail that connects the Fort Vancouver NHS and VNHR with the Vancouver waterfront and downtown. The trail is located within and is a feature of the FVNHS Park for much of its extent. It also overlaps with the Columbia River Renaissance Trail; it is

not counted as a separate recreational property. The trail follows sidewalks on local streets in downtown Vancouver outside of FVNHS and Renaissance rail. While considered in the CRC Final Section 4(f) Evaluation, per 23 CFR 774.13 (F)(4), trails that are part of a local transportation system and function primarily for transportation, such as the Discovery Historic Loop Trai, are subject to Section 4(f) approval."

Figure 4-39. IBR Program Modified LPA Improvements in Relation to VNHR Historic District

Map, page 4-109

Shows again realigned Columbia River Renaissance Trail along a new Columbia Way and the development of looped pathway off of the bridges to the Columbia Street/Columbia Way intersection. No indication of a Waterfront Park/Monument Plaza connection.
[image: page15image44107072][image: page15image44110528]

IBR Draft SEIS - RECORD #2745 DETAIL

First Name :	Sharon
Last Name :	Rixen
Attachments :	127075_DSEIS_2745_Rixen_Original.pdf (6 kb)

IBR Draft SEIS - RECORD #2745 DETAIL

Submission Date : 11/17/2024
First Name : Sharon
Last Name : Rixon
Business/Organization/Agency :

Submission Input :

To Whom It May Concern:

I have been a resident on Hayden Island for the past 45 years. I live in a floating home in North Portland Harbor. Our community consists of 177 family floating homes. The plans I have reviewed will have a tremendous impact to our future livability, as well as financially. Following are some of our concerns and major issues to be addressed:

1. Increase of noise pollution because of the additional traffic and the equipment fuel fumes (such as barges and tugs within our community) that we will have to endeavor for several years.

2. Displacement of families, full acquisition of family homes within our community and the financial burden placed on the our community because of lost revenue.

3. Loss of real property i.e. our parking lot and gate access into our community and its financial impact.

4. It appears we will loose on and off ramps going north and south off the Hayden Island. This causes great concern for emergency vehicles, as well as residents, trying to get on and off the island.

5. Bringing light-rail (the crime train) to the island will negatively impact our livability and security for all residents on Hayden Island. For example, the daily reports across the city regarding issues surrounding

light-rail i.e. shooting, knifing, fights, bullying, etc).

I lived on Hayden Island when the I-205 bridge opened. At that time the traffic on I-5 was reduced by approximately 50%. It would make better sense to build a third bridge to the west of Hayden Island over the Columbia River to accommodate all the traffic coming from Washington State going out to the SW area of Portland. This would, once again, reduce the traffic by approximately 50% on I-5. Also, this would alleviate the necessity of having to build a new I-5 bridge, at this time. With the continued maintenance over the years and reduced traffic on the I-5 bridge its sufficient to last for several years. The prudent thing to do at this time, would be to build a third bridge over the Columbia River giving one more option for crossing the Columbia River.

Thank you for listening.

Sharon Rixen

[redacted]

[redacted]

IBR Draft SEIS - RECORD #2746 DETAIL

First Name :	Ashaen
Last Name :	Patel
Attachments :	DSEIS-2746_Patel_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #2746 DETAIL

Submission Date : 11/17/2024
First Name : Ashaen
Last Name : Patel
Business/Organization/Agency :

Submission Input :

First Name:
Ashaen

Last Name:
Patel

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
The transit stops and multi-use paths should be adjacent to better facilitate transfers. Both the stops and path should also extend beyond the current proposal on the Vancouver side to avoid the incredible 100ft elevation gain ramp. There should also be better transit and bike connectivity with stops on the Portland side because the current Kenton neighborhood area stop alone is not enough.

JCA comment #: 560

IBR Draft SEIS - RECORD #2748 DETAIL

First Name :	Corey
Last Name :	Near-Ansari
Attachments :	DSEIS-2748_NearAnsari_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #2748 DETAIL

Submission Date : 11/17/2024
First Name : Corey
Last Name : Near-Ansari
Business/Organization/Agency :

Submission Input :

First Name:
Corey

Last Name:
Near-Ansari

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
The focus of the Interstate Bridge Replacement must prioritize safety, sustainability, and long-term maintenance. Given the significant costs involved, the project must enhance public infrastructure to serve all modes of transportation and mitigate negative impacts on local communities.

The proposed project may lead to a 62% increase in Vehicle Miles Traveled (VMT), according to a study conducted by Just Crossing Alliance, which could worsen congestion, increase air pollution, and negatively affect water quality. Local communities in Portland and Vancouver are at risk of greater noise pollution and environmental degradation. A reliable health impact assessment must be conducted to understand and address the potential risks of these changes, particularly for vulnerable neighborhoods near the bridge.

To achieve a more sustainable and equitable solution, the project should focus on improving safety for pedestrians, cyclists, and public transportation users. This includes ensuring safe, efficient routes for multimodal commuters while avoiding pedestrian exposure to high-traffic freight areas. The project should be at most what is necessary for improving congestion with sufficient justification, and prioritize enhancements to public transportation without excessive infrastructure expansion. Focusing on these priorities will ensure the project is cost-effective and better aligned with community needs.

JCA comment #: 558

IBR Draft SEIS - RECORD #2749 DETAIL

First Name :	Kieffer
Last Name :	Katz
Attachments :	DSEIS-2749_Katz_Original.pdf (2 kb)

IBR Draft SEIS - RECORD #2749 DETAIL

Submission Date : 11/18/2024
First Name : Kieffer
Last Name : Katz
Business/Organization/Agency :

Submission Input :

I live 5 blocks away from I-5 in North Portland and while I look forward to the replacement of the I-5 bridge with a seismically sound, modern alternative, I strongly oppose the current Interstate Bridge Replacement plan.

Washington and Oregon are at the forefront of both the climate movement and the impacts of climate change. Between increasingly devastating wildfires, heat domes, flooding, and ice storms, our region is intimately familiar with the risks of a warming world.

That's why it is so essential that we replace the I-5 bridge without adding more lanes of highway or new safety shoulders. The law of induced demand has shown again and again that those new lanes will be filled up with more drivers - the very same drivers we need to get off the roads if we're to reach our climate goals. Instead, the new bridge should prioritize bikes, public transit, and pedestrians, with multi-modal accommodations that make it easy to switch between methods as commutes dictate.

There is a clear need for a forward-thinking IBR plan that will serve the needs of Washington, Oregon, the broader west coast, and the entire freight industry in which our cities play such an important role. It is equally clear that this is not that plan.

We have the opportunity to be a beacon of pragmatic progress. Let's make sure we seize it.

IBR Draft SEIS - RECORD #2751 DETAIL

First Name :	Adhya
Last Name :	Gowda
Attachments :	DSEIS-2751_Gowda_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #2751 DETAIL

Submission Date : 11/17/2024
First Name : Adhya
Last Name : Gowda
Business/Organization/Agency :

Submission Input :

First Name:
Adhya

Last Name:
Gowda

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
The focus of the Interstate Bridge Replacement must prioritize safety, sustainability, and long-term maintenance. Given the significant costs involved, the project must enhance public infrastructure to serve all modes of transportation and mitigate negative impacts on local communities.

The proposed project may lead to a 62% increase in Vehicle Miles Traveled (VMT), according to a study conducted by Just Crossing Alliance, which could worsen congestion, increase air pollution, and negatively affect water quality. Local communities in Portland and Vancouver are at risk of greater noise pollution and environmental degradation. A reliable health impact assessment must be conducted to understand and address the potential risks of these changes, particularly for vulnerable neighborhoods near the bridge.

To achieve a more sustainable and equitable solution, the project should focus on improving safety for pedestrians, cyclists, and public transportation users. This includes ensuring safe, efficient routes for multimodal commuters while avoiding pedestrian exposure to high-traffic freight areas. The project should be at most what is necessary for improving congestion with sufficient justification, and prioritize enhancements to public transportation without excessive infrastructure expansion. Focusing on these priorities will ensure the project is cost-effective and better aligned with community needs.

JCA comment #: 556

IBR Draft SEIS - RECORD #2753 DETAIL

First Name :	Charlie
Last Name :	LaPorte
Attachments :	DSEIS-2751_LaPorte_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #2753 DETAIL

Submission Date : 11/17/2024
First Name : Charlie
Last Name : LaPorte
Business/Organization/Agency :

Submission Input :

First Name:
Charlie

Last Name:
LaPorte

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
The focus of the Interstate Bridge Replacement must prioritize safety, sustainability, and long-term maintenance. Given the significant costs involved, the project must enhance public infrastructure to serve all modes of transportation and mitigate negative impacts on local communities.

The proposed project may lead to a 62% increase in Vehicle Miles Traveled (VMT), according to a study conducted by Just Crossing Alliance, which could worsen congestion, increase air pollution, and negatively affect water quality. Local communities in Portland and Vancouver are at risk of greater noise pollution and environmental degradation. A reliable health impact assessment must be conducted to understand and address the potential risks of these changes, particularly for vulnerable neighborhoods near the bridge.

To achieve a more sustainable and equitable solution, the project should focus on improving safety for pedestrians, cyclists, and public transportation users. This includes ensuring safe, efficient routes for multimodal commuters while avoiding pedestrian exposure to high-traffic freight areas. The project should be at most what is necessary for improving congestion with sufficient justification, and prioritize enhancements to public transportation without excessive infrastructure expansion. Focusing on these priorities will ensure the project is cost-effective and better aligned with community needs.
Please don’t replace the bridge; instead focus on sustainability and improving safety for non-driving forms of transportation. As a driver this is still a priority for me.

JCA comment #: 554

IBR Draft SEIS - RECORD #2755 DETAIL

First Name :	Indra
Last Name :	Toepke
Attachments :	DSEIS-2755_Toepke_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #2755 DETAIL

Submission Date : 11/17/2024
First Name : Indra
Last Name : Toepke
Business/Organization/Agency :

Submission Input :

First Name:
Indra

Last Name:
Toepke

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
The focus of the Interstate Bridge Replacement must prioritize safety, sustainability, and long-term maintenance. Given the significant costs involved, the project must enhance public infrastructure to serve all modes of transportation and mitigate negative impacts on local communities.

The proposed project may lead to a 62% increase in Vehicle Miles Traveled (VMT), according to a study conducted by Just Crossing Alliance, which could worsen congestion, increase air pollution, and negatively affect water quality. Local communities in Portland and Vancouver are at risk of greater noise pollution and environmental degradation. A reliable health impact assessment must be conducted to understand and address the potential risks of these changes, particularly for vulnerable neighborhoods near the bridge.

To achieve a more sustainable and equitable solution, the project should focus on improving safety for pedestrians, cyclists, and public transportation users. This includes ensuring safe, efficient routes for multimodal commuters while avoiding pedestrian exposure to high-traffic freight areas. The project should be at most what is necessary for improving congestion with sufficient justification, and prioritize enhancements to public transportation without excessive infrastructure expansion. Focusing on these priorities will ensure the project is cost-effective and better aligned with community needs.
Building more exclusively car centered roads is a step backwards not forwards! Invest in sustainable transportation!

JCA comment #: 552

IBR Draft SEIS - RECORD #2757 DETAIL

First Name :	Liam
Last Name :	Blackwell-Weiss
Attachments :	DSEIS-2757_Blackwell_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #2757 DETAIL

Submission Date : 11/17/2024
First Name : Liam
Last Name : Blackwell-Weiss
Business/Organization/Agency :

Submission Input :

First Name:
Liam

Last Name:
Blackwell-Weiss

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
The focus of the Interstate Bridge Replacement must prioritize safety, sustainability, and long-term maintenance. Given the significant costs involved, the project must enhance public infrastructure to serve all modes of transportation and mitigate negative impacts on local communities.

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Bad for the environment/climate, bad for Portland, no bridge!!!!!!!

JCA comment #: 550

IBR Draft SEIS - RECORD #2759 DETAIL

First Name :	Brent
Last Name :	Schauer
Attachments :	DSEIS-2759_Schauer_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #2759 DETAIL

Submission Date : 11/17/2024
First Name : Brent
Last Name : Schauer
Business/Organization/Agency :

Submission Input :

First Name:
Brent

Last Name:
Schauer

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
The focus of the Interstate Bridge Replacement must prioritize safety, sustainability, and long-term maintenance. Given the significant costs involved, the project must enhance public infrastructure to serve all modes of transportation and mitigate negative impacts on local communities.

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JCA comment #: 548

IBR Draft SEIS - RECORD #2761 DETAIL

First Name :	Joel
Last Name :	McDonald
Attachments :	DSEIS-2761_McDonald_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #2761 DETAIL

Submission Date : 11/17/2024
First Name : Joel
Last Name : McDonald
Business/Organization/Agency :

Submission Input :

First Name:
Joel

Last Name:
McDonald

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
I live in North Portland and occasionally bike from to Vancouver, and if we're going to pour a bunch of money into the IBR project I'd love it if bikes/alt transit were taken more into consideration. Ideally the multiuse path would be on the same side of the bridge as the light rail, so people can use the transit elevators to access either the multiuse path or the transit station. I'd also like to avoid the half mile ramp "dip" that is planned on the Vancouver side, and instead stay elevated to the last MAX stop. Thanks!

JCA comment #: 546

IBR Draft SEIS - RECORD #2763 DETAIL

First Name :	Jason
Last Name :	Fussell
Attachments :	DSEIS-2763_Fussell_Original.pdf (3 kb)

IBR Draft SEIS - RECORD #2763 DETAIL

Submission Date :	11/18/2024
First Name :	Jason
Last Name :	Fussell
Business/Organization/Agency :	Ironworkers Local 29

Submission Input :

SEIS Advisory Board Members,

The Ironworkers Local 29 represent more than 1,600 registered apprentices and journey workers across our jurisdiction in Oregon and Southwest Washington. Our members are the backbone of North American infrastructure—countless bridges, hospitals, critical infrastructure, and skylines are built by skilled Union ironworkers.

I-5 is the main and only continuous, north-south interstate highway on the west coast and links the United States with Canada and Mexico. The 5-mile section of I-5 between Vancouver and Portland plays a disproportionate effect on traffic conditions over the Columbia River. Now, it is crucial to ensure that we build a seismically sound bridge that addresses our region's current and future highway, freight, transit, bike and pedestrian needs along with reducing greenhouse gas emissions by easing congestion and increasing transit options.

With an approximate 10-year timeframe for the project, this project has the potential to create thousands of family wage construction career opportunities and registered apprenticeship is the foundation of these career opportunities. The earn as you learn model has a proven track record and our 4-year state registered apprenticeship ensures that we have the skilled, safe, and local workforce our region needs. Additionally, we are proud of our partnerships with a variety of community groups, and the fact that more than 30% of our apprentices are people of color, women, Veterans, members of historically disadvantaged communities, or some combination of these groups.

Access to state registered apprenticeship programs is vital to the success of this project, training workers, and ensuring that those communities most affected by the project benefit the most. To guarantee that this happens and both diverse contractors large and small AND workers benefit, a Project Labor Agreement (PLA) or Community Benefit Agreement (CBA) is crucial on all projects under the IBR banner. These agreements have been used widely across the country and in the Pacific Northwest and can be tailored to the unique needs of the project and communities. However, to truly benefit communities and workers, requirements must include access to employer paid family healthcare and retirement benefits, family sustaining wages, and strong training standards so journey workers and apprentices alike are safe. Without an agreement, there is no assurance that all these important community benefits will be met, nor a guarantee that communities most affected by this project are benefiting the most.

Replacing the bridge is critical to the future of our region and economy, and doing nothing is not an option. The existing bridge was designed before modern seismic design codes were established and is severely lacking in multi-modal transportation options. Because of the size, scale, complexity of the project, and number of affected communities—a PLA or CBA is the only way to mitigate risk and uplift communities around the project. Let's build the bridge of the future our region needs under a strong agreement and make certain that we create

family wage careers and opportunities for Oregonians and Washingtonians, while increasing transit options and reducing greenhouse gas emissions.
Sincerely,

Jason Fussell
Business Manager
Ironworkers, Local 29

IBR Draft SEIS - RECORD #2764 DETAIL

First Name :	BRIDGET E
Last Name :	BAYER
Attachments :	DSEIS-2764_BAYER_Original.pdf (2 mb) BNA_Comment_Water_Access_Point.pdf (2 mb)

IBR Draft SEIS - RECORD #2764 DETAIL

Submission Date :	11/17/2024
First Name :	BRIDGET E
Last Name :	BAYER
Business/Organization/Agency :	
Attachments :	BNA_Comment_Water_Access_Point.pdf (2 mb)

Submission Input :

This Water Access comment is from the Bridgeton Neighborhood Association
?

Thank you,

Bridget Bayer, Board Chair
Bridgeton Neighborhood Association <http://www.livebridgeton.com/>

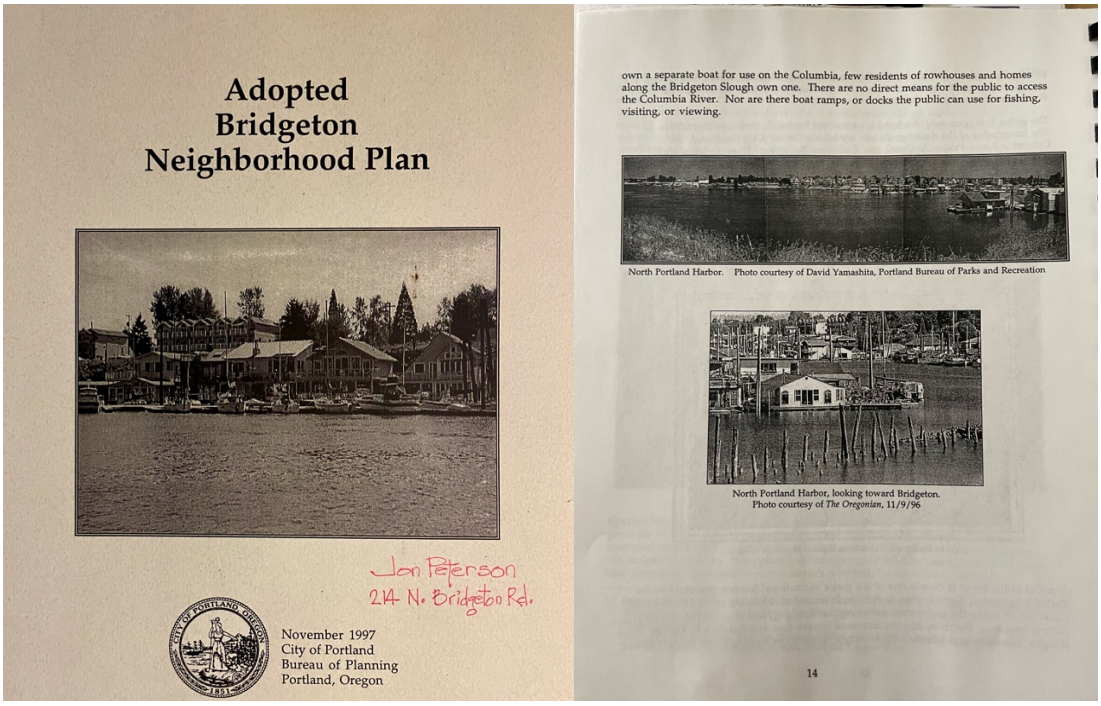
12 November 2024

IBR To Include Water Access for Non-Motorized Boats on North Portland Harbor

There is no direct means for the public to access the Columbia River in North Portland Harbor. This is an opportunity for real equity. Though the Bridgeton neighborhood now has more rentals than single family homeowners, only landowners have access to the river. There are no boat ramps, no docks, and no water access so the public can recreate, fish, view or simply view the beautiful river up close.

The IBR programs offer an ideal opportunity to add a water access point for people with non-motorized boats, kayaks, stand up paddle boards (SUPs), and canoes so that people can enjoy the river themselves.

The Bridgeton neighborhood plan was adopted by city Council in 1997. In it, creation of public water access was highlighted as one of the most important parts of the plan. Now is our chance to create this access.



Adopted
Bridgeton
Neighborhood Plan

Jan Peterson
214 N. Bridgeton Rd.

November 1997
City of Portland
Bureau of Planning
Portland, Oregon

own a separate boat for use on the Columbia, few residents of rowhouses and homes along the Bridgeton Slough own one. There are no direct means for the public to access the Columbia River. Nor are there boat ramps, or docks the public can use for fishing, visiting, or viewing.

North Portland Harbor. Photo courtesy of David Yamashita, Portland Bureau of Parks and Recreation

North Portland Harbor, looking toward Bridgeton.
Photo courtesy of *The Oregonian*, 11/9/96

14

Sincerely,

Bridget Bayer, Board Chair
and
Bridgeton Neighborhood Association Board Members

12 November 2024

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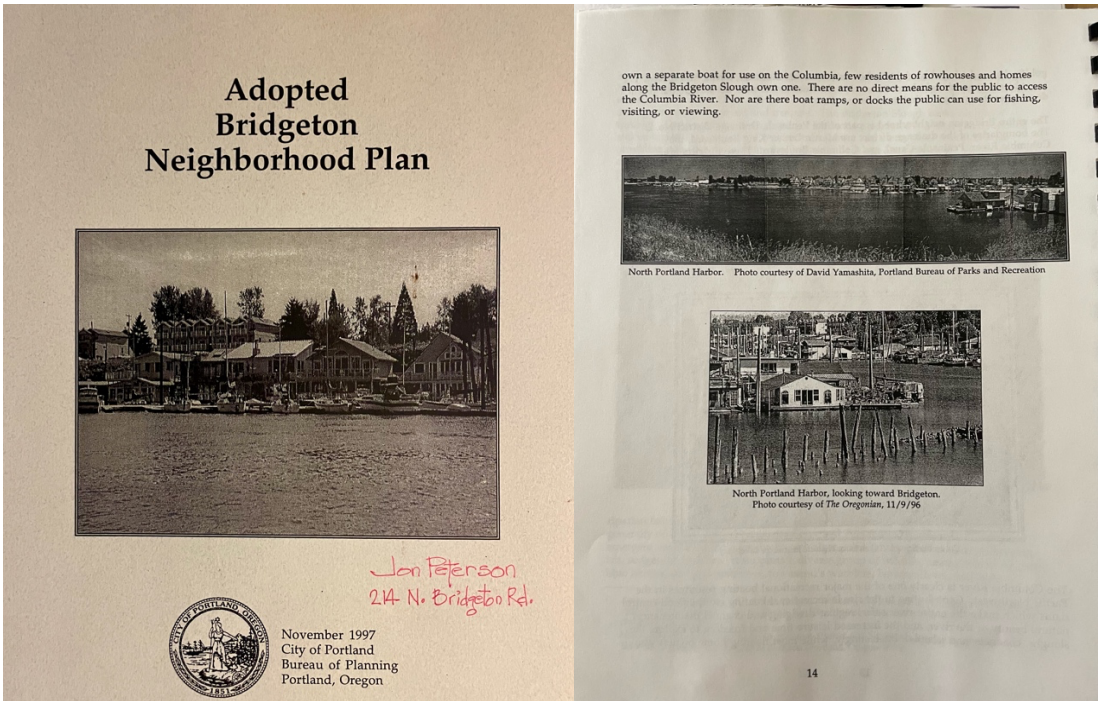

Adopted
Bridgeton
Neighborhood Plan

Jan Peterson
214 N. Bridgeton Rd.

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City of Portland
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Portland, Oregon

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North Portland Harbor. Photo courtesy of David Yamashita, Portland Bureau of Parks and Recreation

North Portland Harbor, looking toward Bridgeton.
Photo courtesy of *The Oregonian*, 11/9/96

14

Sincerely,

Bridget Bayer, Board Chair
and
Bridgeton Neighborhood Association Board Members

IBR Draft SEIS - RECORD #2765 DETAIL

First Name :	BRIDGET
Last Name :	E BAYER
Attachments :	DSEIS-2765_Bayer_Original.pdf (938 kb)

IBR Draft SEIS - RECORD #2765 DETAIL

Submission Date :	11/17/2024
First Name :	BRIDGET
Last Name :	E BAYER
Business/Organization/Agency :	Bridgeton Neighborhood Association
Attachments :	DSEIS_2765_Bayer_Original.pdf (827 kb)

Submission Input :

This comment is from the Bridgeton Neighborhood Association
?

Thank you,

Bridget Bayer, Board Chair
Bridgeton Neighborhood Association <http://www.livebridgeton.com/>

BRIDGETON
NEIGHBORHOOD ASSOCIATION

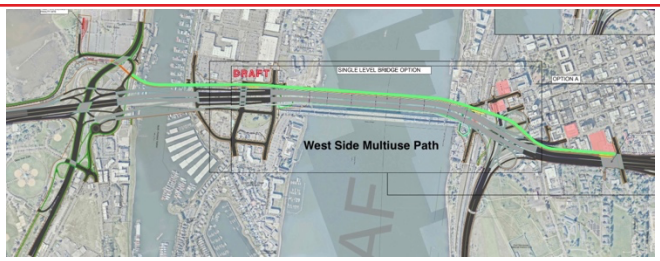
15 September 2024

Comments on Studying building both the multi-use path and the light rail line on the west side of the south bound main bridge

The IBR proposes building the light rail line on the south bound main bridge and the multiuse path on the north bound main bridge span. The IBR proposal makes each system separate from each other. The IBR proposal makes connections between these two systems difficult and inefficient for transit and active transportation users.

The IBR proposal has stairs and elevators providing connections for transit users, but the stairs and elevators are not usable for users of the multi-use path. The multi-use path has ramp connections for users that are not usable for transit riders. Though these two systems are parallel to each other, but they are entirely separated systems. These systems do not connect easily even though active transportation users want to connect to transit.

We believe additional study is needed to connect these two systems together. People who are not driving to their destination, a goal of the IBR, will often use several modes to reach their destination. Users may ride their bikes to a light rail station, place their bikes on the train in storage specially design for bikes on the light rail train, then ride their bikes for the final leg of their trip. The IBR design of entirely separate light rail and multiuse path makes these blended trips difficult.



One idea that needs to be studied more is to build the multiuse path next to the light rail alignment on the south bound main bridge. Compared to the multiuse path on the east side of the main bridge, the multiuse path on the west side next to the light rail alignment better meets the purpose and needs statement for the IBR to (b) improve connectivity, reliability, travel times, and operations of public transportation modal alternatives in the Program area. The west side alignment provides the following improvements:

- Seamless Transition: Users should easily switch between transit and active transportation at any station, with no grade changes or distance barriers.
- Shared Elevator Access: Allowing active transportation users to share transit station elevators eliminates the need for additional infrastructure, making the design more efficient and accessible.
- Creates reductant ways to connect to both transit and multiuse path: If the elevator is not working, users can use the ramp or stairs. User not able to negotiate going up the long ramps can use the elevator. Bike users who get a flat tire on the multiuse path can connect to the light rail station and still get to their destination.

[redacted]

• Provides Eyes on the Path: Transit operators and passengers provide a continuous presence, reducing the isolation felt on a multi-use path and enhancing safety and comfort.

• Better Emergency Egress: The multi-use path should double as an emergency exit route for the transit way, supporting user safety during unexpected events.

• Inclusive Design Principles: These principles ensure the accessibility and usability of both transit and active transportation facilities for individuals of all abilities.

• By building the multiuse path on the west side of the light rail trackway provides greater separation from vehicle noise and would offer a more pleasant experience for active transportation users compared to a multiuse path on the east side immediately next to vehicle travel.

• If the multiuse path was built next to the light rail line on the light rail bridge crossing North Portland Harbor, then the multiuse path connection to the 40 Mile loops would be direct rather than out of direction when the multiuse path is on the local North Portland Harbor Bridge.

Regarding Views: There is a good view of Mt Hood if the multiuse path in on the east side of the north bound main bridge, however there is a good view to the west too. Additionally, a quality view of North Portland Harbor and Mt Hood views could be experienced on the local North Portland Harbor bridge, but the IBR proposes the multiuse path on the west side. The IBR also shows a sidewalk on the east side, if so, we propose that the sidewalk on the east side be as wide as possible and include wide spots for stopping on the route to rest and appreciate one of the region's best views of North Portland Harbor.

Thank you.

Sincerely,

Walter Valenta, BNA Land Use Chair
Bridget Bayer Board Chair
Bridgeton Neighborhood Association Board of Directors

IBR Draft SEIS - RECORD #2766 DETAIL

First Name :	BRIDGET
Last Name :	E BAYER
Attachments :	DSEIS_2766_Bayer_Original.pdf (602 kb)

BRIDGETON
NEIGHBORHOOD ASSOCIATION

15 September 2024

Synergies Empowered by the IBR

Coordinate synergies between improvements by the IBR and other large public and private projects being constructed at the same time. This synergy coordinated by the Cities of Portland and Vancouver could create public amenities greater than any of the individual projects could provide on their own.

Example: **Create Bridgeton Trail Segment of the 40 Mile Loop**

1) IBR Road system requires acquisition of property in order to build the new Harbor Bridges. That property under the new bridges finally puts into public ownership a key missing trail segment of the 40 Mile Loop.
2) At the same time as the IBR, the Army Corp of Engineers is upgrading the adjacent levee. The improved levee will be higher in elevation and finished with a compacted gravel maintenance road.
3) That key trail segment is also located in an existing Portland urban renewal district. The urban renewal district has already designed the finished trail, amenities and connections to local walkways. The urban renewal district had set aside funds to do the finish work once the trail easements were acquired.
4) By completing this Trail segment, Hundreds of residential units in Bridgeton have a direct, protected and safe way to walk and roll to the Expo Light Rail Station. This enhances ridership numbers for the IBR Light Rail and FTA funding requests.

The City of Portland can coordinate these projects together. Work IBR is already planning to do can create a synergy that builds a key piece of Trail infrastructure greater than any one project could do on their own.

This is just one example of possible synergies empowered through the IBR.
There are other synergies for Hayden Island, Vancouver Waterfront and Historic Reserve.

Thank You.

Sincerely,
Walter Valenta, BNA Land Use Chair
Bridget Bayer Board Chair
Bridgeton Neighborhood Association Board of Directors

[redacted]

IBR Draft SEIS - RECORD #2767 DETAIL

First Name :	BRIDGET
Last Name :	E BAYER
Attachments :	DSEIS-2767_Bayer_Original.pdf (2 mb)

IBR Draft SEIS - RECORD #2767 DETAIL

Submission Date :	11/17/2024
First Name :	BRIDGET
Last Name :	E BAYER
Business/Organization/Agency :	Bridgeton Neighborhood Association
Attachments :	DSEIS_2767_Bayer_Original.pdf (2 mb)

Submission Input :

This comment is from the Bridgeton Neighborhood Association

?
Thank you,

Bridget Bayer, Board Chair
Bridgeton Neighborhood Association <http://www.livebridgeton.com/>

BRIDGETON
NEIGHBORHOOD ASSOCIATION

15 September 2024

Separating Freight and Bike Travel on the Marine Drive Interchange and On-Ramps

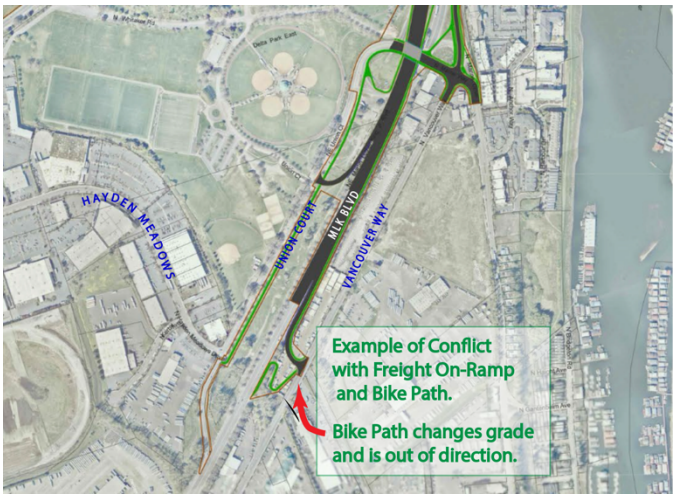
One important purpose and need of the IBR is to (c) improve highway freight mobility and address interstate travel and commerce needs in the Program area.

Another important purpose and need are to (b) improve connectivity, reliability, travel times, and operations of public transportation modal alternatives in the Program area.

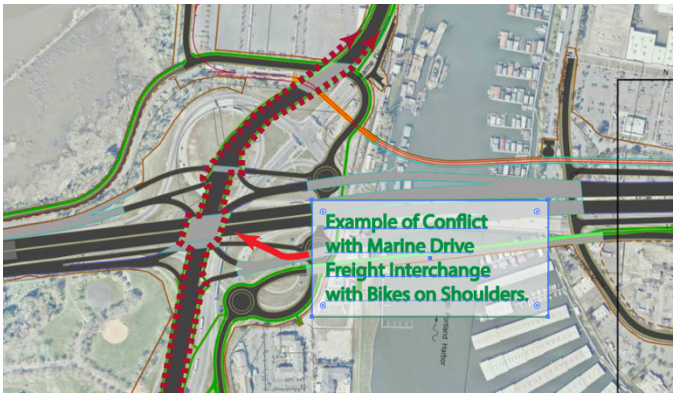
A way to meet the purpose and needs of both Freight Users and Active Transportation Users is to build active transportation routes physically separated from Freight routes as much as possible. Maximizing this separation is key to creating efficient Freight routes while creating safer, more attractive, and therefore more heavily used walking, rolling, and biking routes.

Examples of Conflicts between Freight and Active Transportation users.

The proposed IBR design for the ramp from Vancouver Way to MLK North poses significant conflict between Freight and Bikes, as the proposed Bike route travels changes grade along a switch back, crosses a major Freight intersection and climbs a grade up along a freight-heavy on-ramp.



Another example of possible Freight-Bike conflict is in the Marine Drive Interchange. Here IBR proposes to build a complete bike lanes and pedestrian sidewalk on both sides of the Interchange.



Even if the IBR is required by State Law to provide bike and pedestrian facilities on the Marine Drive interchange, we recommend additional study on improving two aspects of these improvements:

[redacted]

BRIDGETON
NEIGHBORHOOD ASSOCIATION

15 September 2024

1) Any facilities for bike and ped that must be built on Marine Drive needs to be built in a way that separates bike and ped travel from Freight as much as possible using techniques such as barriers and raised bike roadways.

2) To discourage any active transportation users from crossing the Marine Drive interchange, also build alternative routes that go around the Marine Drive Interchange rather than through the interchange. This separate bike ped system needs be so well design that it becomes the preferred route. Current IBR design has the MLK active user connection provided partially along MLK shoulders and partially on separated trails. To become the preferred route, an active transportation route that is not reliant of MLK shoulders need to be developed. This separated preferred corridor needs to conveniently link to each of the existing regional bike corridors.

Complete separation creates safety for both the people that are walking, biking and rolling in this area, but also makes it safer and more efficient for Freight Users who don't have to worry about negotiating on ramps with curves and with grade changes while watching out for bike users traveling the exact same routes.

This separation better meets 3 parts of the purpose and needs statement of the IBR; (a) improve travel safety and traffic operations on the I-5 river crossing and associated interchanges; (b) improve connectivity, reliability, travel times, and operations of public transportation modal alternatives in the Program area; (c) improve highway freight mobility and address interstate travel and commerce needs in the Program area.

Given the Marine Drive interchange is usually described as the **most heavily used Freight corridor in Oregon**, we encourage the IBR to work with the Active Transportation Users in combination with the Freight Users **together rather than separately** to refine designs that efficiently moves Freight Users through the Marine Drive Interchange and Active Transportation Users around the Interchange.

Thank you.

Sincerely,
Walter Valenta, BNA Land Use Chair
Bridget Bayer Board Chair
Bridgeton Neighborhood Association Board of Directors

[redacted]

IBR Draft SEIS - RECORD #2768 DETAIL

First Name :	BRIDGET
Last Name :	E BAYER
Attachments :	DSEIS-2768_Bayer_Original.pdf (3 mb)

IBR Draft SEIS - RECORD #2768 DETAIL

Submission Date :	11/17/2024
First Name :	BRIDGET
Last Name :	E BAYER
Business/Organization/Agency :	Bridgeton Neighborhood Association
Attachments :	DSEIS_2768_Bayer_Original.pdf (3 mb)

Submission Input :

This comment is from the Bridgeton Neighborhood Association

?
Thank you,

Bridget Bayer, Board Chair
Bridgeton Neighborhood Association <http://www.livebridgeton.com/>

BRIDGETON
NEIGHBORHOOD ASSOCIATION

15 September 2024

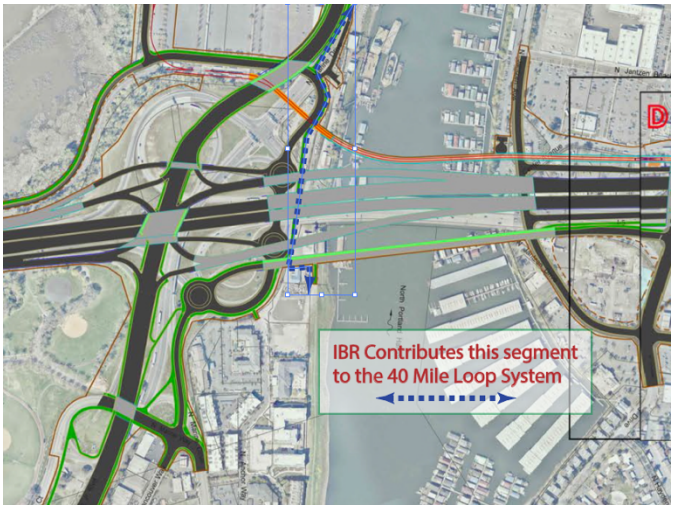
Comments on IBR Multi-Use path connections to the 40-Mile Loop East/West Corridor

The 40-Mile Loop is a comprehensive regional trail system forming a central Hub that connects nearly all other regional trails and parks within Multnomah County. The Loop alignment, which has been planned and incorporated into regional land use frameworks for over 40 years. While the trail alignment for the 40-Mile Loop has long been established, certain easements remain unacquired, and some portions of the trail are yet to be constructed.

The adopted alignment of the 40-Mile Loop passes through the area impacted by the Interstate Bridge Replacement (IBR) project. While the IBR project provides several benefits to the 40-Mile Loop, we believe additional study is warranted to make the proposed trails safer and more usable.

IBR Positive Contributions to the 40-Mile Loop Trail

The IBR project will construct the segment of the 40-Mile Loop within the project area. This new trail segment will provide a safe, separated trail connecting the existing 40-Mile Loop trail located west of the proposed bridges through the project area, under the many new IBR bridges emanating from mainland Portland. After crossing under the local North Portland Harbor Bridge, the east most bridge proposed, the IBR will stub out the Trail to the East for a future connection to the Bridgeton Trails segment of the 40 Mile Loop. This is a good trail addition to the 40 Mile Loop and appreciated by the 40 Mile Loop Land Trust board.



Concerns with the Proposed Connection of 40 Mile Loop to the multiuse path on the local North Portland Harbor Bridge.

However, the proposed trail connections from the multiuse path on the local North Portland Harbor Bridge to the new 40-Mile Loop segment is not optimal. The proposed design requires users to travel out of their way, navigating a traffic circle and crossing vehicle lanes to reach both the eastbound and the westbound trail connection. This routing is neither convenient nor efficient and could discourage its use.

BRIDGETON
NEIGHBORHOOD ASSOCIATION

15 September 2024

Request for Further Study of better East and West Connections to the 40 Mile Loop

We strongly recommend that alternative design options be considered to provide a more direct, connection to and from the east and west to the local Harbor Bridge multiuse path.

Possible additional study include:

1) Creating a direct connection from the East stub of the Bridgeton Trail to the sidewalk on the east side of the local Harbor Bridge. This direct connection would make it easier and more appealing for cyclists and pedestrians to cross the Harbor Bridge, while also offering a scenic route with views of North Portland Harbor and Mt Hood.
2) Additionally, we request that the sidewalk on the east side of the local Harbor Bridge be designed to be as wide as possible, with areas to rest and enjoy the views, further enhancing the experience for users.
3) Study more direct trail connections from the local Harbor Bridge multi use path to both the east and the west that do not involve routes around the Marine Drive traffic circles and crossing travel lanes.
4) Study routing the IBR entire multiuse path on the west side of the bridges rather than the east side. If the multiuse path was located on the light rail bridge on the west side, the east and west connection would be straight forward and direct. The west side multi use path is discussed more in a separate comment.
5) Lastly, we have a separate comment on ways the IBR could facilitate more just a stub for the east side connection to the Bridgeton Trail segment of the 40 Mile Loop.

Thank you.

Sincerely,

Walter Valenta, BNA Land Use Chair
Bridget Bayer Board Chair
Bridgeton Neighborhood Association Board of Directors

[redacted]

IBR Draft SEIS - RECORD #2769 DETAIL

First Name :	BRIDGET
Last Name :	E BAYER
Attachments :	DSEIS_2769_Bayer_Original.pdf (2 mb)

BRIDGETON
NEIGHBORHOOD ASSOCIATION

15 September 2024

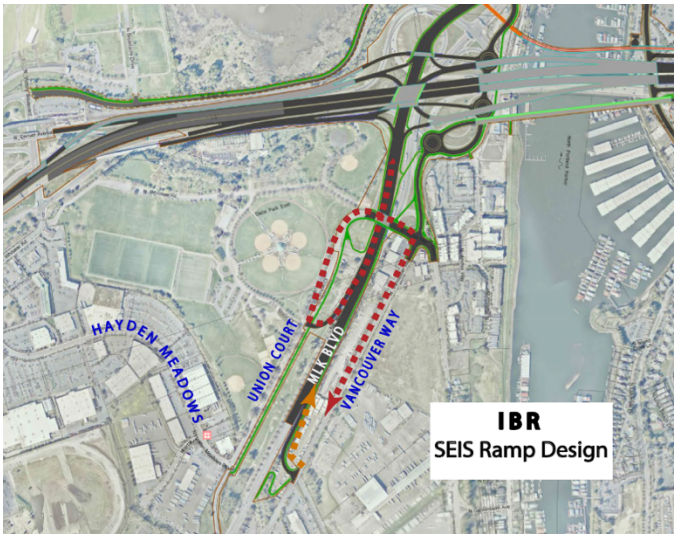
The MLK Undercrossing and Complete Interchange
Better Freight & Neighborhood Access Ramps for the IBR

Initial Proposed Design for MLK Access Ramps

The Interstate Bridge Replacement (IBR) proposes a Martin Luther King (MLK) on-ramp and off-ramp design that meets very minimal requirements:

1) These ramps replace the existing ramp connections.
2) These ramps merge vehicles onto MLK further away from the Marine Drive single point intersection improving the merge/weave problems with the current intersection.

But this minimal ramp design does not excel with other important goals for Portland including efficient regional freight movement, recreational park safety and understandable way finding.



Problems with the proposed MLK ramp design:

1) The proposed ramp design creates out of direction travel.
2) The proposed design is confusing to navigate. A traveler will take the off-ramp to leave the Marine Drive / MLK interchange, but not clearly see how to get back onto the Marine Drive / MLK interchange. There is the same way finding confusion in reverse
3) The proposed MLK off-ramp conflicts with Delta Park's primary recreational entrance. Since this a major Freight travel ramp, this ramp should not conflict with the major access to a major recreational area.
4) The proposed MLK ramp encourages Freight movement to use East Marine Drive for access when the Freight Master plan wants freight travel to use Columbia Blvd to MLK for Freight Access rather than East Marine Drive which is a local neighborhood roadway.

BRIDGETON
NEIGHBORHOOD ASSOCIATION

15 September 2024

Proposal - MLK Undercrossing and Complete Intersection

There is a better design to meet all of IBR requirements while also meeting broader Portland Freight, Neighborhood and Parks planning goals.

This new ramp design proposes an undercrossing under MLK connecting Hayden Meadows Drive to Vancouver Way. This new MLK undercrossing combined with slightly relocated MLK on-ramps and off-ramps has the following advantages:

1) The Complete MLK Intersection minimizes out of direction travel.
2) The complete MLK intersection removes Freight users from the main Delta Park Entrance.
3) This design would be easier to navigate. It is more understandable for Freight and other users just how to get on and off MLK and the access the Marine Drive Interchange.
4) The new undercrossing meets the purpose and need of the IBR : (a) improve travel safety and traffic operations on the I-5 river crossing **and associated interchanges**; (c) **improve highway freight mobility** and address interstate travel and commerce needs in the Program. The MLK Undercrossing designs meets the purpose and needs better than the minimal IBR ramp design.
5) Lastly the MLK undercrossing provides a new way to access the Hayden Meadows Drive commercial shopping area. This new access could help off-set the removal of the direct access to Hayden Meadows that exist today from the current Marine Drive intersection to I-5 South to Interstate Ave off ramp. This existing off ramp connection from Marine Drive south bound on-ramp to Interstate Ave was removed to provide for the new Braided Ramp from Marine Drive to I-5. This Interstate Ave ramp connection from I-5 still exits if someone is on the main line of I-5. However Marine Drive travelers on the local Portland system wanting to access Interstate Ave in the IBR proposed design would have to travel through the three new Marine Drive traffic circles, then to Expo Road then connect to Interstate Ave. The MLK undercrossing design would create another more direct way to get to Hayden Meadows Drive and Interstate Ave.

BRIDGETON
NEIGHBORHOOD ASSOCIATION

15 September 2024

IBR's Response to building the MLK Undercrossing

Have Portland Fund This – Not the IBR

This undercrossing has been proposed to the IBR early in the design process. IBR has stated that a MLK undercrossing might be nice to have but that the undercrossing should be something that City of Portland funds later.

A complete MLK Undercrossing and ramp design is more appropriate to be included in the IBR funding package. This undercrossing improves Freight connections for this intersection described as Oregon's Most Important Freight Interchange. The MLK Undercrossing excels at meeting the IBR purpose and need (c) **improve highway freight mobility**.

Rather than the IBR build a minimally acceptable ramp design and suggest the local city come back later and rebuild the preferred connection is not good public policy. The cost of the undercrossing would be an exceptionally large funding request for Portland. The Undercrossing is more appropriate to be funded in the budget for a project that describes itself as building a bridge to meet the needs for the next 100 years.

Please study the MLK undercrossing and full interchange design.
Involve the Freight Community, the residents, Portland Transportation and Portland Parks.
Let's work together to refine a ramp and undercrossing design that excels at meeting section C of the purpose and need of the IBR to improve freight mobility.

Thank you.

Sincerely,

Walter Valenta, BNA Land Use Chair
Bridget Bayer Board Chair
Bridgeton Neighborhood Association Board of Directors

[redacted]

IBR Draft SEIS - RECORD #2770 DETAIL

First Name :	BRIDGET
Last Name :	E BAYER
Attachments :	DSEIS-2770_Bayer_Original.pdf (1 mb)

IBR Draft SEIS - RECORD #2770 DETAIL

Submission Date :	11/17/2024
First Name :	BRIDGET
Last Name :	E BAYER
Business/Organization/Agency :	Bridgeton Neighborhood Association
Attachments :	DSEIS_2770_Bayer_Original.pdf (1 mb)

Submission Input :

This comment is from the Bridgeton Neighborhood Association

?
Thank you,

Bridget Bayer, Board Chair
Bridgeton Neighborhood Association <http://www.livebridgeton.com/>

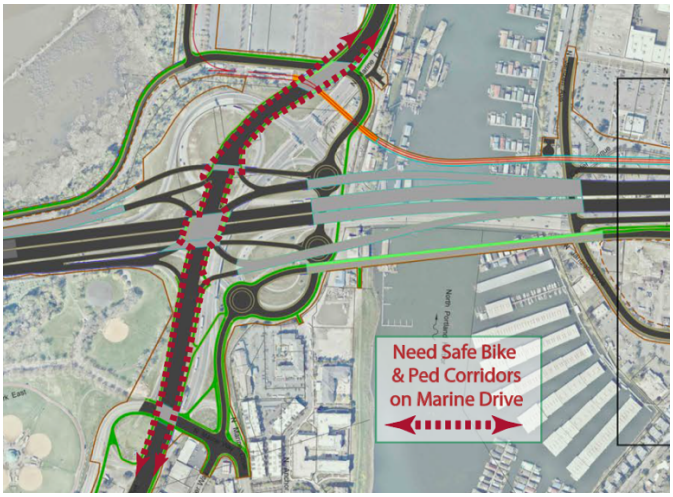
BRIDGETON
NEIGHBORHOOD ASSOCIATION

15 September 2024

Comments on Freight and Bike conflicts on the Marine Drive Single Point Interchange

The IBR proposed design for Bike lanes through the Marine Drive Single Point Interchange presents a major conflict between bike and Freight movements. As the Marine Drive interchange is considered to be one of the most important Freight Interchanges in the State of Oregon, we request that these pathways for active transportation be built separated from Freight movements to provide safe passage for active transportation users.

This meets the purpose and needs of the IBR to (b) improve connectivity, reliability, travel times, and operations of public transportation modal alternatives in the Program area and(c) improve highway freight mobility and address interstate travel and commerce needs in the Program area.



Please study how these corridors could be built separated from the vehicle travel lanes using barriers or raised active transportation pathways. In addition, the IBR should study how to use the new technologies of sensors that detect active transportation user approaching intersections crossings. These advanced sensors trigger traffic signals, so that users crossing through many these intersections does not have to individually press a button at each crossing and wait for the signal to change one crossing at a time.

Thank you

Sincerely,
Walter Valenta, BNA Land Use Chair
Bridget Bayer Board Chair
Bridgeton Neighborhood Association Board of Directors

[redacted]

IBR Draft SEIS - RECORD #2771 DETAIL

First Name :	Brandon
Last Name :	Falk
Attachments :	DSEIS_2771_Falk_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2771 DETAIL

Submission Date :	11/18/2024
First Name :	Brandon
Last Name :	Falk
Business/Organization/Agency :	NelsonGlobal

Submission Input :

completely stupid idea, i dont care about i-5 bridge. my folks live in vancouver across the 205 bridge this is my only source of child care and my child care will end being that both parties do not want to pay any tolls. leave the bridges alone, completely stupid idea we don't want or need a new bridge. Leave the bridges alone, please we pay enough taxes already.

IBR Draft SEIS - RECORD #2772 DETAIL

First Name :	BRIDGET
Last Name :	E BAYER
Attachments :	DSEIS-2772_Bayer_Original.pdf (897 kb)

IBR Draft SEIS - RECORD #2772 DETAIL

Submission Date :	11/17/2024
First Name :	BRIDGET
Last Name :	E BAYER
Business/Organization/Agency :	Bridgeton Neighborhood Association
Attachments :	DSEIS_2772_Bayer_Original.pdf (896 kb)

Submission Input :

This comment is from the Bridgeton Neighborhood Association

?
Thank you,

Bridget Bayer, Board Chair
Bridgeton Neighborhood Association <http://www.livebridgeton.com/>

BRIDGETON
NEIGHBORHOOD ASSOCIATION

15 September 2024

Importance of the Architectural Design of the new Bridges

Once the project decides whether the main bridges are going to be a single level bridges, stack style bridges or lift style bridges, the IBR project will develop the aesthetic characteristics of the final Bridges.

We request that once the bridge configuration is determined the IBR will hold a public process on the final architectural design of not only the main bridges but the entire bridge corridor. This process could be modeled after similar processes that Portland has done in the past for Tilikum Crossing and the new Burnside Bridge. Both processes were led by National Design Experts in collaboration with Local Design Experts, the project engineers and members of the public to recommend a final bridge architecture to the region's leaders.

We believe the aesthetics of these bridges matter, and that they are an important inspiration that helps move the project forward. The architectural style of the bridges creates a gateway to both Oregon and Washington. The view of the bridges from the Vancouver shoreline and Hayden Island are important to the future developments in those areas.

Should the IBR select the stack bridges as the best option, that bridge structure, even though it is a basic truss, can be executed with finesse. Remember the bridges crossing North Portland Harbor could have architectural significance as well. Imagine driving over the Harbor between twin cable-stayed bridges on each side, one beautiful structure holding up the light rail bridge, and its twin holding up the local Harbor bridge.

Even a flat bridge can have architectural significance. How the constraints of the project are resolved in the hands of a talented Bridge Architect become the Bridge's unique beauty.

The region is investing a lot into these bridges that will be part of our environment for a long time. Let's build something we are proud to leave to our children and our children's children.

Sincerely,
Walter Valenta, BNA Land Use Chair
Bridget Bayer Board Chair
Bridgeton Neighborhood Association Board of Directors

[redacted]

IBR Draft SEIS - RECORD #2774 DETAIL

First Name :	Gay
Last Name :	Greger
Attachments :	DSEIS_2774_Greger_Original.pdf (4 kb)

IBR Draft SEIS - RECORD #2774 DETAIL

Submission Date : 11/17/2024
First Name : Gay
Last Name : Greger
Business/Organization/Agency :

Submission Input :

First Name:
Gay

Last Name:
Greger

Business or Organization:
Citizen

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
Active transportation has been short-changed by this project. It does not make sense to separate bike/ped from

light rail. Bike/ped and light rail should be coupled together to (a) allow the light rail line to act as a buffer for the bike/ped pathway and (b) provide both with access to the elevators - eliminating the need for the extraordinarily long spiral paths. I wonder if the main span of the bridge could be realigned to swing slightly east before curving to the north - thus moving the bridge slightly east when it hits the north shore.

Regardless, it is important to get this right. This bridge needs to work for everyone long after we are all dead and buried. We need to have the courage to do what needs to be done for ourselves and for future generations.

JCA comment #: 544

IBR Draft SEIS - RECORD #2776 DETAIL

First Name :	Keenan
Last Name :	Murray
Attachments :	DSEIS_2776_Murray_Original.pdf (3 kb)

IBR Draft SEIS - RECORD #2776 DETAIL

Submission Date : 11/17/2024
First Name : Keenan
Last Name : Murray
Business/Organization/Agency :

Submission Input :

First Name:
Keenan

Last Name:
Murray

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
The Interstate Bridge Replacement project must take into account the historical inequities of car dependency and move towards prioritizing public transit, walking and biking. Car dependency causes pollution as well as noise pollution, which has been shown to be harmful because it causes stress and therefore has many direct health impacts. We are also in the middle of a climate crisis and there is no room in any future transportation system that doesn't place public transit above private cars. Connections for cyclists must be easy to use and not include large ramps that must be negotiated. Public transit designs should take into account future demand and not just current needs or light rail systems.

JCA comment #: 542

IBR Draft SEIS - RECORD #2778 DETAIL

First Name :	N/A
Last Name :	mwv
Attachments :	2778_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2778 DETAIL

Submission Date :	11/15/2024
First Name :	N/A
Last Name :	mwv
Business/Organization/Agency :	

Submission Input :

Test Email

IBR Draft SEIS - RECORD #2779 DETAIL

First Name :	Diane
Last Name :	Valenta
Attachments :	2779_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2779 DETAIL

Submission Date :	11/15/2024
First Name :	Diane
Last Name :	Valenta
Business/Organization/Agency :	

Submission Input :

Test Email

IBR Draft SEIS - RECORD #2780 DETAIL

First Name :	Diane
Last Name :	Valenta
Attachments :	2780_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #2780 DETAIL

Submission Date :	11/15/2024
First Name :	Diane
Last Name :	Valenta
Business/Organization/Agency :	

Submission Input :

Test Email

IBR Draft SEIS - RECORD #2781 DETAIL

First Name :	Ron
Last Name :	Schmidt
Attachments :	DSEIS-2781_schmidt_original.pdf (1 kb)

IBR Draft SEIS - RECORD #2781 DETAIL

Submission Date : 11/18/2024

First Name : Ron

Last Name : Schmidt

Business/Organization/Agency :

Submission Input :

The CRC did a half hearted study on relocating the floating homes being displaced. We ask that you do a comprehensive study and plan to build a new moorage to relocate the floating homes considering the ability you have to navigate the complex planning rules overlays by multiple governmental agencies. Also, it is wrong to put a whole neighborhood in jeopardy with a temporary easement when that neighborhood - Jantzen Beach Moorage, Inc. comprised of 175 floating homes - is up to 1/2 mile away from the project. Please be clear and communicate the impact on those families during the construction project, finding ways to minimize impact.

IBR Draft SEIS - RECORD #2782 DETAIL

First Name :	Jeremy
Last Name :	Simants
Attachments :	DSEIS-2782_simants_original.pdf (1 kb)

IBR Draft SEIS - RECORD #2782 DETAIL

Submission Date : 11/18/2024

First Name : Jeremy

Last Name : Simants

Business/Organization/Agency :

Submission Input :

Please work with impacted communities to take into make proper use of the spaces below the new bridge and they do not become a target to illicit activity. Include living walls or painted concrete with murals and art to discourage graffiti. The cities should include things like dog parks, skates parks, etc. To encourage public use of spaces below bridges. For bicycle and pedestrian crossings, please take into consideration sight lands around turns, raps, and stairways for safety and there is enough passing space for bicycles to get around pedestrians. An extradosed or cable stayed design with highlighted lighting would be the most visible appealing to residents who have to see this new bridge every day.

IBR Draft SEIS - RECORD #2783 DETAIL

First Name :	Jeremy
Last Name :	Baker
Attachments :	DSEIS-2783_baker_original.pdf (1 kb)

IBR Draft SEIS - RECORD #2783 DETAIL

Submission Date :	11/18/2024
First Name :	Jeremy
Last Name :	Baker
Business/Organization/Agency :	

Submission Input :

I believe this boondoggle is a waste of taxpayer money. We need a third bridge prio to talking about replacing this bridge.

IBR Draft SEIS - RECORD #2784 DETAIL

First Name :	Jinnet
Last Name :	Powel
Attachments :	DSEIS-2784_powel_original.pdf (1 kb)

IBR Draft SEIS - RECORD #2784 DETAIL

Submission Date :	11/18/2024
First Name :	Jinnet
Last Name :	Powel
Business/Organization/Agency :	

Submission Input :

I'm excited to have the bridge improved. I support tolls to partially pay for the bridgins cost particularly if automatic photo identification and billing occure so as not to slow traffic with a toll stop. We should use the photo-liscence billing system used in MA and NY

IBR Draft SEIS - RECORD #2785 DETAIL

First Name :	Liz
Last Name :	holloway
Attachments :	DSEIS-2785_holloway_original.pdf (1 kb)

IBR Draft SEIS - RECORD #2785 DETAIL

Submission Date :	11/18/2024
First Name :	Liz
Last Name :	holloway
Business/Organization/Agency :	

Submission Input :

Please consider bike lanes and lessening the impact on the environment. Thank you.

IBR Draft SEIS - RECORD #2786 DETAIL

First Name :	Michael
Last Name :	Brooks
Attachments :	DSEIS-2786_brooks_original.pdf (1 kb)

IBR Draft SEIS - RECORD #2786 DETAIL

Submission Date :	11/18/2024
First Name :	Michael
Last Name :	Brooks
Business/Organization/Agency :	

Submission Input :

Additional auxilary lanes does not seem necessary nor am I convinced it would do anything to help with traffic when that funding could go towards light rail or public transit. I also want to advocate for low-income discounts for any tolls that would be considered

IBR Draft SEIS - RECORD #2787 DETAIL

First Name :	Peter
Last Name :	Fels
Attachments :	DSEIS-2787_Fels_original.pdf (3 kb)

IBR Draft SEIS - RECORD #2787 DETAIL

Submission Date :	11/18/2024
First Name :	Peter
Last Name :	Fels
Business/Organization/Agency :	none

Submission Input :

I am very interested in the impact of whatever the new bridge(s) look like. I am concerned about climate change and the world my generation is leaving my children and grandchildren. We need to do everything possible to reduce GHG emissions. With that in mind, my comments are:

The top priority of the IBR program should be reduction of polluting emissions. Decreasing congestion should only be a priority to the extent it will reduce emissions. The focus should be on eliminating or reducing VMTs by emphasizing public transportation and alternative, non-polluting, methods of travel, or no travel at all.

One way to address congestion which I have not seen as an option in the materials is to add lanes in each direction and reduce lanes in the opposite direction during rush hour, as is done in Seattle. This would lower the cost of building extra lanes that are not needed at other times of day.

The draft SEIS says nothing about ways to discourage bridge travel altogether. Increasing remote work and shopping access should be an added priority. This could be done by improving broadband in underserved areas of Southwest Washington, for example. Efforts should also focus on eliminating the need for people to travel from Southwest Washington to Beaverton or other Portland are locations for work by creating better job opportunities on the north side of the Columbia River.

Increased use of public transit can be encouraged in several ways. First is to make it free. Transit fares make up a small percentage of C-Tran and Metro's revenue. Use some of the IBR funds to replace that revenue to make travel free and encourage greater use. People in Clark County also need to be educated to understand that public transit is safe and convenient. Right now there is a strong bias against public transportation partly based on the theory that it is dangerous.

Transit park and rides need to be convenient and nice enough that people will prefer to get out of their cars and ride the train or bus. And the transit itself needs to be at least as fast from point A to point B that people won't be discouraged from using it. Currently the express buses into Portland are relatively fast, while the Max is very slow.

People are not going to drive from east Vancouver, Camas, Battle Ground or other places outside central Vancouver to get to a transit stop and then on public transit which results in getting to their destination an hour later than they would have by driving, particularly if they have to pay for parking. To reduce VMTs, the IBR must include seamless public transit travel from all areas of southwest Washington to Portland and Washington county destinations.

Additionally, the SEIS is not transparent about what pedestrian and bike paths might look like. There needs to be a "fly-over" type visualization so we can see and comment on the proposed paths. From the current information, I can't tell if I'd prefer a one or two level bridge, for example. What would these variations,

including intersections, actually look like from the viewpoint of a bicycle rider or pedestrian?

I can say the current bike and pedestrian paths across the river are frightening. Whatever the new paths look like, they should be well separated from traffic noise, fumes and lanes and from the edge of the bridge.

IBR Draft SEIS - RECORD #2788 DETAIL

First Name :	Mark
Last Name :	Schmutz
Attachments :	DSEIS-2788_schmutz_original.pdf (1 kb)

IBR Draft SEIS - RECORD #2788 DETAIL

Submission Date :	11/18/2024
First Name :	Mark
Last Name :	Schmutz
Business/Organization/Agency :	Mark Schmutz

Submission Input :

PLEASE GET THIS DONE!!! It's a high priority for our region and the vital I-5 corridor for family, relationships, health and commerce. Thank you for moving forward. I hope it will increase flow both ways and include the light rail.

IBR Draft SEIS - RECORD #2789 DETAIL

First Name :	David
Last Name :	Morehead
Attachments :	DSEIS-2789_Morehead_original.pdf (2 kb)

IBR Draft SEIS - RECORD #2789 DETAIL

Submission Date :	11/18/2024
First Name :	David
Last Name :	Morehead
Business/Organization/Agency :	Sandos

Submission Input :

I like the idea of a bridge and a light rail but who's going to have control over the light rail who's the money going to be going to who's going to be overseeing things is it going to be Metro is it going to be Clark county is it going to be Vancouver City council is it going to be the downtown association none of these answers really provide me any kind of comfort or any of my friends I think direct outreach to local businesses who will be directly affected is a wise move
I know there is a large portion of historic downtown that is worried that they'll be getting bulldozed there's a lot of people that want to develop a lot of that area around there and move here and they're not sure if they'll have somewhere to live here in a bit
and there's generational families here in Vancouver where a lot of them are worried that they're livelihoods or jobs careers professions might be destroyed also the additional strain of mega traffic on 205 getting overworked could affect PDX airport airlines and air traffic and then having another 17 billion dollar bridge we need to fix in another 20 years it's got to be a way to make a bridge while we keep a bridge and then replace it with the new bridge once the new bridge is done
I just maybe it's ignorant maybe I'm clueless but there's got to be some things we can do to at least compensate these people whose lives were about to uproot and destroy
Equity is cool and all too but I think we need to focus on the major economic impacts especially with the current presidential administrations already planned economic impacts that will be severely impacting a lot of people in this area

Also would like to bring up the houseless population and how they'll be affected with one of their number one hubs getting destroyed or worked on for so many years straight will they still be allowed to park their RVs and cars along the jantzen Beach and Delta Park or will this hurt their way of life

Last comment there was a study that came out recently saying that most of the traffic bottleneck is actually due to the downtown Portland Rose quarter freeway piece of traffic that goes from about Rosa Parks way to the exit 302 I believe worried about that one I got a lot of friends who work in Portland and live in Vancouver who will definitely be losing their job the day they can't get to work and there is a lot of people who work in Vancouver who live in Portland that will also lose their jobs is there any room for unemployment or some kind of benefits to help these people retain some semblance of a good life

Just curious if we will get more in depth reports on these going forward instead of more concept art and feel good committees (also curious how much of the budget is being blown on aesthetics and not common sense mathematics and bridge work)

Excitingly looking forward to the next step
-dave

IBR Draft SEIS - RECORD #2790 DETAIL

First Name :

Last Name :

Attachments : DSEIS-2790_??????_Original.pdf (48 kb)

IBR Draft SEIS - RECORD #2790 DETAIL

Submission Date : 11/18/2024

First Name :

Last Name :

Business/Organization/Agency :

Submission Input :

Я заинтересован в дополнительном анализе высоты предлагаемого моста для всех участников движения: водителей авто, грузовиков и общественного транспорта, пешеходов и велосипедистов. Реконструкция моста важна для региона, но мне хотелось бы, чтобы мы выбрали наилучший и не очень дорогой вариант.

[English translation]

I am interested in further analysis of the height of the proposed bridge for all road users: car, truck and public transit drivers, pedestrians and bicyclists. Reconstructing the bridge is important to the region, but I would like us to choose the best and least expensive option.

IBR Draft SEIS - RECORD #2791 DETAIL

First Name :	raj
Last Name :	savara
Attachments :	DSEIS-2791_savara_original.pdf (1 kb)

IBR Draft SEIS - RECORD #2791 DETAIL

Submission Date :	11/18/2024
First Name :	raj
Last Name :	savara
Business/Organization/Agency :	Assured Technology Solutions llc

Submission Input :

I don't see the LRT moving to the existing railway bridge West of the current I-5 bridge. This change would affect the design of the current bridge to negate a movable section for ships. The incline required for the height is more than the LRT can climb. Please address why this option is not one of the choices. The main goal is not to have a bridge that has to open for marine traffic. This causes hours of traffic issues which this solution must solve.

IBR Draft SEIS - RECORD #2792 DETAIL

First Name :	Stephanie
Last Name :	Harris
Attachments :	DSEIS-2792_Harris_original.pdf (1 kb)

IBR Draft SEIS - RECORD #2792 DETAIL

Submission Date : 11/18/2024

First Name : Stephanie

Last Name : Harris

Business/Organization/Agency :

Submission Input :

The one most important thing is NO NO NO to Max. It is a losing crime train. Horribly managed. We do not need Portland crime to come to Vancouver. We have enough of our own problems. I used to ride Max and now you could not pay me to ride it. It is dangerous. I have witnessed myself several times drug dealing, when I use to ride it. I watched a young man use a knife and cut up some seats. I reported it and was told they do nothing about it and just fix the seats. Apparently, the signs that say to report crime and they use camera's are useless. NO NO NO to the Max. Use the money to make the replacement bridge to be big enough for future growth.

IBR Draft SEIS - RECORD #2793 DETAIL

First Name :	Bob
Last Name :	Johnson
Attachments :	DSEIS-2793_johnson_original.pdf (1 kb)

IBR Draft SEIS - RECORD #2793 DETAIL

Submission Date :	11/18/2024
First Name :	Bob
Last Name :	Johnson
Business/Organization/Agency :	

Submission Input :

I agree that we would benefit to a new bridge but I do not agree with light rail being added. We don't want access to our state by anyone that can jump on a train! I think we need to rethink the plan overall, I think it can be done more efficiently than what is being presented.

IBR Draft SEIS - RECORD #2794 DETAIL

First Name :	Debra
Last Name :	Johnson
Attachments :	DSEIS-2794_johnson_original.pdf (1 kb)

IBR Draft SEIS - RECORD #2794 DETAIL

Submission Date :	11/18/2024
First Name :	Debra
Last Name :	Johnson
Business/Organization/Agency :	

Submission Input :

I agree that we would benefit to a new bridge but I do not agree with light rail being added. We don't want access to our state by anyone that can jump on a train! I think we need to rethink the plan overall, I think it can be done more efficiently than what is being presented.

IBR Draft SEIS - RECORD #2795 DETAIL

First Name :	Judy L
Last Name :	Todd
Attachments :	DSEIS-2795_todd_original.pdf (1 kb)

IBR Draft SEIS - RECORD #2795 DETAIL

Submission Date :	11/18/2024
First Name :	Judy L
Last Name :	Todd
Business/Organization/Agency :	Resident of NE Portland

Submission Input :

I oppose the current plan for the I-5 Exchange. It appears it has been crafted with outdated basic information as to total traffic numbers, and is an overreach that will only exacerbate the necessary work to provide other mass-transit options to a growing population.
Thinking in the 21st Century, in the current political environment will take more imagination and creative force than just 'complying' with an increase in the systems.

We have done 'more and bigger is better' for most of my 70 years of living, and yet the quality of living as communities with equal access to wellbeing, housing, and education still evades us in the Portland Metro Region. We could be a beacon of inspiration. But this plan is not that. It is a 'tower of power' over the most basic necessities.
It is overshoot.

IBR Draft SEIS - RECORD #2796 DETAIL

First Name :	Robert
Last Name :	Carroll
Attachments :	DSEIS-2796_Carroll_original.pdf (1 kb)

IBR Draft SEIS - RECORD #2796 DETAIL

Submission Date :	11/18/2024
First Name :	Robert
Last Name :	Carroll
Business/Organization/Agency :	

Submission Input :

the citizens of SW Washington in particular and the state in general will benefit greatly by the IBR. we need to move forward. i urge that the EIS be accepted.

thanks

IBR Draft SEIS - RECORD #2797 DETAIL

First Name :	James
Last Name :	Flynn
Attachments :	DSEIS-2797_flynn_original.pdf (1 kb)

IBR Draft SEIS - RECORD #2797 DETAIL

Submission Date :	11/18/2024
First Name :	James
Last Name :	Flynn
Business/Organization/Agency :	

Submission Input :

Make the river crossing bridge 8 lanes. NO light rail.

IBR Draft SEIS - RECORD #2798 DETAIL

First Name :	Angela
Last Name :	N/A
Attachments :	DSEIS_2798_NA_Original.pdf (3 kb) grasshopper_+13607138092_11_18_2024_193874146.mp3 (309 kb)

IBR Draft SEIS - RECORD #2798 DETAIL

Submission Date : 11/18/2024

First Name : Angela

Last Name : N/A

Business/Organization/Agency :

Submission Input :

Hi, my name is Angela and my number is [redacted]. I wanted to comment on the plan for the I-5 bridge and I need more information before I can comment. I spent about five hours looking through the materials or trying to look through the materials yesterday and looking for a video that would explain the options. I saw the aerials but that didn't really explain anything and I had questions as I read the and I do have, it's difficult for me to read, so I was looking for a video that would describe and explain the different options compare and contrast and I wasn't finding that it's probably someplace but I looked at quite a few videos and looked at one that was a recent one that just kind of was discussion so is there a video that describes those and if not is there somebody I can talk to or someplace to go to get my questions answered I have a of questions about, you know, from reading the materials that I need to know before I respond because I don't want to respond and be uneducated in my response. Again, my name is Angela and my phone number is [redacted]. Thank you.

IBR Draft SEIS - RECORD #2799 DETAIL

First Name :	Malcolm
Last Name :	Hodge
Attachments :	DSEIS-2799_Hodge_original.pdf (1 kb)

IBR Draft SEIS - RECORD #2799 DETAIL

Submission Date :	11/18/2024
First Name :	Malcolm
Last Name :	Hodge
Business/Organization/Agency :	Banner Bank

Submission Input :

I view the IBR as a critically important project for the future economic viability of the region. The IBR is, in my opinion, the most important project in the PNW. I am a passionate advocate for small businesses and the flow of commerce in the region would be greatly hindered if the two I-5 bridges aren't replaced.

IBR Draft SEIS - RECORD #2800 DETAIL

First Name :	Logan
Last Name :	Gray
Attachments :	DSEIS-2800_gray_original.pdf (1 kb)

IBR Draft SEIS - RECORD #2800 DETAIL

Submission Date :	11/18/2024
First Name :	Logan
Last Name :	Gray
Business/Organization/Agency :	

Submission Input :

#1: Swap I-205 & I-5. This would encourage thru traffic to use the Easterly route and no more draw bridge on I-5. #2: Build a third draw bridge East of the existing two. West bridge for Southbound, East bridge for Northbound. The center bridge becomes an express lane for AM Southbound, PM Northbound. Works on I-5 in Seattle very well. No more concerns about too high for aircraft or too low for marine navigation. All problems solved; should be cheaper.