IBR Draft SEIS - RECORD #3001 DETAIL

First Name :	Maureen
Last Name :	O'Neal
Attachments :	DSEIS-3001_ONeal_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #3001 DETAIL

Submission Date : 11/18/2024
First Name : Maureen
Last Name : O'Neal
Business/Organization/Agency :

Submission Input :

First Name:
Maureen

Last Name:
O'Neal

Business or Organization:
N/A

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
I think the new highway expanision proposal is a bad idea, and a waste of money considering the Willamette

Week reported "new examination of the assumptions underlying the proposed Interstate Bridge between Portland and Vancouver says the project relies on bogus numbers." there must be a better way, and we, as Oregonians, should find it. this proposal is flawed, and will not be a solution to our porblems.

JCA comment #: 754

IBR Draft SEIS - RECORD #3002 DETAIL

First Name :	John
Last Name :	Ley
Attachments :	DSEIS-3002_Ley_Original.pdf (402 kb) Letter to Buttigieg against IBR.pdf (381 kb)

November 18, 2024

The Honorable Pete M. Buttigieg
Secretary of Transportation
U.S. Department of Transportation
1200 New Jersey Ave, SE
Washington, DC 20590

Subject: I-5 Interstate Bridge Citizen Comments DSEIS

Dear Secretary Buttigieg:

I am writing in opposition to the I-5 Interstate Bridge Replacement program's (IBR) application for federal funding. This includes The National Infrastructure Project Assistance (MEGA) discretionary grant program, the Bridge Investment Program and FTA Capital Investment Grant funding via the Infrastructure Investment and Jobs Act (IIJA) or other federal funding sources. Many citizens in the Portland metropolitan area oppose the current proposal.

Where's the value? Truly. What problem does this expenditure of perhaps $10 billion taxpayer dollars solve? How much traffic congestion will be eliminated? Is "replacement" reasonable? Is the proposal actually "green" in terms of saving carbon emissions? This is the largest public works project in the history of the Portland metro area.

Would taxpayers replace the Brooklyn Bridge; or would they maintain and upgrade it as a valuable historical structure? What alternatives have been ignored or cast aside? What level of transit is needed to serve expected ridership? Can any form of transit actually generate significant ridership for the money expended, to justify a huge transit expenditure that exceeds one quarter of the cost of the project?

The project fails to solve the people's number one priority – saving time and reducing traffic congestion. Both commute times and traffic congestion will get worse in the Locally Preferred Alternative (LPA).

The Purpose and Need of the project lists six items to be addressed. 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.[1] The proposed LPA fails to adequately solve the top two items: traffic congestion and freight mobility.

This is a federal interstate highway. Its purpose is to enhance the movement of people and freight over long distances, to improve interstate and international commerce. The "solution" should fit the purpose. Portland has the 7th worst traffic congestion in the nation because they have refused to add vehicle capacity for the past 4 decades. This project does nothing to reduce

[1] IBR Draft SEIS https://justcrossing.org/sdeis-pre-release/ibr_draft_seis_1-00_pan_rev2_clean.pdf

congestion or save people and freight haulers time. Hours of congestion will increase by 30 percent after the completion of the project[2].

Instead, the proposal allocates 54 percent of the bridge surface to bikes, pedestrians and mass transit[3]. Only 46 percent is allocated to cars and freight haulers. Over one quarter of the current cost is for the transit component.

“General purpose” traffic makes up over 89 percent of current crossings, with another nearly 9 percent freight haulers. Transit makes up less than two percent of bridge traffic, with “active transportation” (bikes and pedestrians) a rounding error at 0.2 percent[4]. For 98 percent of the current crossings to be allocated just 46 percent of the proposed bridge space is beyond ridiculous.

How often can program administrators, politicians, and bureaucrats tell lies or half-truths, cherry-picking “facts” to suit a predetermined “solution”, before the federal transportation agencies refuse to fund a project? Taxpayers expect government agencies to stick to legitimate, demonstrable standards that enforce rules and actually solve transportation problems.

There is evidence of at least one agency trying to fleece taxpayers. Portland’s TriMet is demanding 19 new light rail vehicles for a 1.9 mile extension of an existing line. Furthermore, they plan to charge somewhere between $10 million and $15 million per vehicle, when they just paid $4.5 million each for four new light rail vehicles on a 10-mile extension. The response from the IBR team – we just accept whatever the local agency gives us.[5]

There is a “new normal”[6] where people work from home, drive their privately owned vehicles, and avoid using mass transit in commuting to work. Nationally and locally, transit ridership is down significantly.[7] We need a project that addresses reality and saves people time, not wishful thinking or a special interest bailout of Portland’s TriMet transit agency.

A summary of citizen objections are as follows:

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[2] Traffic congestion to increase by over 3 hours
https://www.clarkcountytoday.com/news/traffic-congestion-to-increase-by-over-three-hours-after-7-5-billion-interstate-bridge-replacement-project/
[3] Over half bridge proposal allocated to transit, bikes and pedestrians
https://www.clarkcountytoday.com/news/over-half-interstate-bridge-proposal-allocated-to-transit-pedestrians-and-bicyclists/
[4] IBR adds new transit options
https://www.clarkcountytoday.com/news/ibr-adds-new-transit-options-for-consideration-to-new-bridge-over-columbia-river/
[5] Bridge management defends TriMet’s excessive demands
https://www.clarkcountytoday.com/news/bridge-management-defends-trimets-excessive-demands-for-project/
[6] RTC “New Normal”
https://www.clarkcountytoday.com/news/rtc-says-new-normal-for-low-transit-ridership-and-high-private-vehicle-use/
[7] Transit Ridership Down Significantly
https://www.clarkcountytoday.com/news/national-and-local-transit-ridership-down-significantly-feds-report/

- The cost projection has ballooned about 56 percent in 2 years and only has a “virtual design”. The IBR initially told the community the cost would be in a range of $3.2 to $4.8 billion and is now $5 to $7.5 billion.[8] The program announced in December 2023 the cost will be rising again.[9]
- IBR Administrator Greg Johnson recently admitted updated cost projections will not occur “until this time next year”[10], or June of 2025. An 18-month delay in updating costs is outrageous and fails to let citizens provide input on the impact of rising cost projections.
- The cost of the Hood River-White Salmon Bridge over the Columbia River just exploded 215 percent[11], adding to citizens' concerns about the future cost of the IBR.
- The transit component will be the most expensive rail project in the world, on a “per mile” basis. The IBR is seeking $2 billion for a 1.9 mile TriMet MAX light rail extension, or one billion per mile.[12] They demand an upgrade to their Gresham vehicle maintenance facility, over ten miles from the project area..
- The current proposal spends 10 to 15 times what is needed. The two states will build a bridge over the Columbia River at Hood River for $520 million[13] (now exploding to $1.12 billion). The IBR says the cost to replace just the bridge is $500 million, or 6.6 percent of the entire project.[14]
- Less than half the structure is dedicated to vehicles and freight haulers. The IBR reports 54 percent of the structure will be allocated to transit, bikes and pedestrians[15]. This is an interstate freeway, supposedly dedicated for national, international and regional commerce. It’s not a recreation area.
- The IBR is proposing nothing more than a rebranded Columbia River Crossing (CRC) which was rejected a decade ago because it was “a bridge too low”, it had tolls, and was

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[8] Clark County Today
https://www.clarkcountytoday.com/news/what-good-is-a-shiny-new-bridge-when-our-kids-cant-safely-cross-the-street-in-our-neighborhoods/
[9] Joe Cortright - $9 Billion IBR cost
https://www.clarkcountytoday.com/opinion/opinion-it-looks-like-the-interstate-bridge-replacement-could-cost-9-billion/
[10] Updated Costs for Interstate Bridge
https://www.clarkcountytoday.com/news/updated-costs-for-interstate-bridge-wont-happen-until-next-year/
[11] Hood River Bridge cost explodes 215 percent
https://www.clarkcountytoday.com/news/hood-river-bridge-cost-explodes-215-percent/
[12] Clark County Today
https://www.clarkcountytoday.com/news/i-5-bridge-replacement-project-has-the-worlds-most-expensive-light-rail/
[13] Hood River Bridge Authority https://hoodriverbridge.org/about
[14] Joe Cortright - $500 million bridge costs $7.5 billion
https://www.clarkcountytoday.com/opinion/opinion-why-does-a-500-million-bridge-replacement-cost-7-5-billion/
[15] Over Half IBR allocated to transit, bikes and pedestrians
https://www.clarkcountytoday.com/news/over-half-interstate-bridge-proposal-allocated-to-transit-pedestrians-and-bicyclists/

"a light rail project in search of a bridge"[16]. The CRC was a "financial nightmare" according to forensic accountant Tiffany Couch.[17]

- Economist Joe Cortright says the IBR proposal is "a value destroying proposition"[18].
- The US Coast Guard has rejected the IBR request to build a "bridge too low" with only 116 feet of clearance for marine traffic. They appropriately demand a bridge that provides at least the current 178 feet of clearance[19] and prefer "unlimited" clearance.
- The project will not save people time. Travel times will double from Vancouver to Portland by 2045. Furthermore, they predict HALF of rush hour traffic will be stuck going zero to 20 mph after spending $7.5 billion[20].
- Hours of congestion will increase by 30 percent to 13.75 hours daily, if the Locally Preferred Alternative (LPA) is built, comparing 2019 traffic congestion with 2045 projected congestion. The IBR is accepting a "solution" that doesn't solve current congestion problems, and will allow things to get much worse, all while spending over $7.5 billion. Citizens in cars and trucks will have paid tolls for two decades[21] towards the cost, while transit and active transportation users will pay nothing.
- The proposal is bad for the environment. The IBR projects that half of rush hour vehicles will be stuck in congestion traveling zero to 20 mph a decade after completion of the project. Cars stuck idling can emit 20 times more pollution than those traveling 30 mph.[22]
- Almost all of the IBR's projected "carbon emission reduction" comes from people getting out of POVs and riding transit[23]. If people refuse transit, there is no CO2 reduction.
- A miniscule hoped for reduction in vehicle miles traveled (VMT) of 0.55 percent makes up the balance of projected CO2 emissions reduction. Note there never has been a reduction in VMT except for significant economic downturns and the pandemic lockdowns[24].
- Over 25 percent ($2 billion) of the project's cost is tied to a 1.9-mile extension of light rail that almost nobody will ride. It is more than triple the previous cost per mile for Portland's light rail. The MAX Yellow Line travels 14 miles per hour – far too slow for people wanting to save time. Eliminating light rail in favor of Bus Rapid Transit (BRT) would

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[16] The $2.5 Billion bribe The $2.5 Billion Bribe (wweek.com)
[17] Forensic Accountant - CRC a financial nightmare
https://couv.com/sidebar/tiffany-couch-crc-white-paper
[18] Legislators get final update
https://www.clarkcountytoday.com/news/legislators-get-final-update-on-ibr-before-2024-legislature-sessions-begin/
[19] Oregonian - Coast Guard demands higher bridge
https://www.oregonlive.com/commuting/2022/07/coast-guard-demands-higher-replacement-interstate-bridge-in-preliminary-decision.html
[20] Clark County Today
https://www.clarkcountytoday.com/opinion/opinion-adding-new-lanes-reduces-traffic-congestion-on-i-5/
[21] Traffic congestion to increase over 3 hours
https://www.clarkcountytoday.com/news/traffic-congestion-to-increase-by-over-three-hours-after-7-5-billion-interstate-bridge-replacement-project/
[22] The Speed Sweet Spot https://www.nrdc.org/stories/speed-sweet-spot
[23] The "faux" green Interstate Bridge replacement
https://www.clarkcountytoday.com/news/the-faux-green-interstate-bridge-replacement-proposal/
[24] Annual VMT in the US https://afdc.energy.gov/data/10315#

save nearly $2 billion. It is far more flexible and would travel at roughly twice the speed of light rail.

- TriMet is demanding new taxes from both states[25], in order to pay for operations and maintenance of the light rail extension. Economist Joe Cortright reported “Neither C-TRAN nor TriMet is willing to commit any funds of their own to this project. This is especially important because the USDOT (Federal Transit Administration) won’t fund the capital construction of a project that has no source of operating funds.”
- TriMet’s JC Vannatta told legislators: “TriMet will not be responsible for O&M costs resulting from the extension into Vancouver.”
- TriMet is demanding the project pay for 19 light rail vehicles for a 1.9-mile extension of an existing line. That’s one new vehicle for every one-tenth of a mile.[26] Absurd. Furthermore, the price they seek is $190 million to $290 million, or $10 million to over $15 million per vehicle, between double and triple what they recently paid for replacement light rail vehicles.
- The 2022 INRIX reports Portland is 12th worst in the nation for congestion. Interstate traffic tries to move through the heart of Portland where the I-5 constricts to 2 lanes and poorly designed interchanges cannot handle existing traffic. People lost 72 hours at a cost of $1,216 per driver. The last mile speed was 15 mph.[27] Such problems are appropriately solved with bypasses that provide alternative routes around inner city bottlenecks. This project focuses on the wrong area north of the primary I-5 bottleneck and does not provide any alternative route.
- The 2023 INRIX study reports rush hour commuters spent the equivalent of a full workweek stuck in traffic last year, six hours longer than in 2022. Inrix ranks the Rose Quarter to the Interstate Bridge as the 15th-slowest rush hour traffic corridor in the entire country. Drivers lost 15 minutes a day there to traffic, the equivalent of 61 hours over a year.[28] The project and Oregon refuse to add vehicle capacity at the Rose Quarter to fix the region’s real #1 bottleneck.
- In 2024 Portland had the nation’s 7th worst traffic congestion[29]. Portland sees six hours and 36 minutes of average daily congestion on its roads compared with the national average of three hours and 41 minutes[30].
- The IBR has not done a current traffic projection study. CRC data from 2005 and 2008 studies indicated in 2030, there would be 184,000 daily movements on the corridor, requiring 5.6 lanes in each direction. It further showed 288,000 daily movements by

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[25] TriMet demands new taxes for O&M of light rail
https://www.clarkcountytoday.com/opinion/opinion-new-taxes-required-for-1-3-billion-light-rail-extension-to-vancouver/
[26] Clark County Today
https://www.clarkcountytoday.com/news/paying-too-much-for-too-many-max-light-rail-vehicles/
[27] INRIX 2022 – https://inrix.com/scorecard-city-2022/?city=Portland%20OR&index=37
[28] INRIX 2023 Oregonlive
https://www.oregonlive.com/business/2024/07/portland-traffic-got-a-lot-worse-last-year-study-finds.html
[29] Portland Traffic among the worst
https://www.koin.com/news/portland/portland-traffic-among-the-worst-in-the-u-s-report-shows/
[30] Axios https://www.axios.com/local/portland/2024/09/11/traffic-congestion-worst-study-i-5-bridge

2058, requiring 8.3 lanes in each direction.[31] Replacing a 3-lane bridge with another 3 lane bridge leaves the transportation corridor short by 3 lanes (each direction) on opening day.

- Because the two bridges (I-5 & I-205) over the Columbia River act as a transportation system, in 2058 the traffic was projected to be 549,000 daily vehicles, requiring 16.4 lanes in each direction. In 2035 at the completion of the IBR, there will be 7 lanes, leaving a shortage of 9 lanes (each direction).
- The Clark County Council supports immediate planning for 3rd and 4th bridges.[32] Their focus is on actually saving people travel time, reducing traffic congestion and improving freight mobility.
- The LPA ignores the requests of Hayden Island residents (ground zero for the project). The HiNoon organization wants a 3rd bridge built adding capacity over the Columbia River before any replacement or repurposing of the Interstate Bridge begins.[33]
- Hayden Island Community Advisory Group member Tom Gentry was involuntarily removed from the IBR Community Advisory Group after a year, for simply asking too many logical questions[34] and advocating for the concerns of island residents[35].
- The on/off ramps at the Vancouver waterfront were predicted to possibly have 6 percent grades. The bridge itself may have a 4 percent grade[36]. Rather than improving safety, this project adds potential new hazardous safety conditions, especially for freight haulers in rain, snow and ice that are common Portland winter weather conditions,[37] points out a retired engineer.
- The failed Columbia River Crossing (CRC) was labeled “A bridge too false” by a local media outlet[38] due to all the lies and half-truths told. The IBR continues that pattern of misleading the public.
- Transit ridership projections are grossly unrealistic. Presently there are less than 1,000 transit boardings across the two Columbia River (I-5 and I-205) bridges; 525 on I-5 and 295 on I-205. The IBR projects by 2045 there will be 26,000 to 33,000 daily boarding on

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[31] Kevin Peterson analysis
https://www.clarkcountytoday.com/news/transportation-architect-kevin-peterson-reveals-flaws-in-the-columbia-river-crossing-and-what-could-be-an-option-for-the-interstate-bridge/
[32] Clark County supports planning for 3rd & 4th bridges
https://www.clarkcountytoday.com/news/county-approves-planning-for-third-and-fourth-transportation-corridors/
[33] Interstate Bridge Replacement plan throws North Portlanders under the truck –
https://northpeninsulareview.com/wp-content/uploads/2023/08/Newspaper_8-1-23.pdf
[34] Gentry questions IBR
https://www.clarkcountytoday.com/news/interstate-bridge-replacement-effort-gets-36-million-funding-boost-as-community-group-grapples-with-options/
[35] Clark County Today
https://www.clarkcountytoday.com/news/interstate-bridge-replacement-effort-gets-36-million-funding-boost-as-community-group-grapples-with-options/
[36] Bob Ortblad - Dangerous Options
https://www.clarkcountytoday.com/opinion/letter-the-interstate-bridge-replacement-program-has-presented-three-dangerous-i-5-bridge-options/
[37] Bob Ortblad – New bridge design proves critics right
https://www.clarkcountytoday.com/opinion/opinion-ibr-floats-new-bridge-design-proving-critics-right/
[38] Willamette Week https://www.wweek.com/portland/article-17566-a-bridge-too-false.html

the I-5 corridor alone.[39] There is no evidence that transit ridership will increase 30 to 50 fold in the next two decades[40], let alone during the 100-year life of a replacement bridge.

- The IBR reports 63 percent[41] of people rank travel time as their most important priority for transit. Yet the MAX Yellow Line only travels an average of 14 mph, too slow to attract new ridership.
- TriMet broke multiple promises to citizens and federal agencies when the Yellow Line was created two decades ago. They promised 8 trains an hour in 2020[42], yet only have 4 an hour at peak times and two an hour at non-peak times today[43].
- Our Regional Transportation Council (MPO) recently reported a "new normal", which included a 150 percent increase in people working from home, a 68 percent reduction in transit ridership, and people's preference for driving their privately owned vehicles.[44]
- A 2018 PEMCO survey found 94 percent[45] of Portland metro area residents preferred to use their privately owned vehicles for transportation.
- Former Oregon Transportation Commissioner (OTC) Chair Robert Van Brocklin recently said only 4 percent of people in Portland use transit.[46] He and other OTC members sounded alarms and shared skepticism about how the state would pay for the projects[47].
- Only 525 daily boardings on the C-TRAN "express" bus routes using I-5, an increase of two people from the prior year. Local route ridership has returned to pre pandemic levels, but not ridership across the Columbia River, according to the CEO.
- Unrealistic forecasts including 26,000 to 33,000 transit riders on the I-5 corridor are a red flag. There are ample historical records that accurately document the fact that rather than skyrocketing, local transit ridership continues its long-term declining trend. Transit trips make up far less than 1 percent of bridge traffic. Common sense would not spend a grossly disproportionate percentage on transit at the expense of more than 99 percent of the bridge traffic.

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[39] Clark County Today
https://www.clarkcountytoday.com/news/transit-gets-much-attention-as-details-on-ibr-about-to-be-released/
[40] Another transit failure?
https://www.clarkcountytoday.com/news/is-the-ibr-setting-up-another-transit-failure/
[41] TriMet's broken promises
https://www.clarkcountytoday.com/news/trimets-broken-promises-on-getting-people-to-use-transit/
[42] Cascade Policy Institute - Broken Promises
https://cascadepolicy.org/transportation/the-max-yellow-line-a-look-back-after-15-years/
[43] TriMet Yellow Line schedule https://trimet.org/schedules/w/t1190_1.htm
[44] "New Normal" - Clark County Today
https://www.clarkcountytoday.com/news/rtc-says-new-normal-for-low-transit-ridership-and-high-private-vehicle-use/
[45] Will IBR force people out of cars?
https://www.clarkcountytoday.com/news/will-the-ibr-try-to-force-people-out-of-their-cars/

[46] A data driven solution for IBR 50 years into future
https://www.clarkcountytoday.com/news/a-data-driven-interstate-bridge-solution-50-years-into-the-future/

[47] Two OTC members resign early
https://bikeportland.org/2023/04/14/shakeup-at-oregon-transportation-commission-as-two-members-step-down-before-terms-expire-372946

- Five years ago, Clark County's C-TRAN offered seven "express" bus routes over the Columbia River. Today there are three. There is so little demand for cross-river transit that Portland's TriMet does not offer bus service to Clark County.
- In 2012, CTRAN conducted a survey on light rail, which was rejected in every city in Clark County. The entire county was allowed to vote. In 2013, a county-wide advisory vote on light rail was held. Over 68 percent of voters agreed that voters should be allowed to vote before any taxpayer funds are spent to bring light rail into Clark County.[48]
- Improving and fostering interstate commerce must be a top priority for any transportation project. Adding tolls to the I-5 bridge will divert traffic onto the I-205 bridge and foreseeably gridlock that alternative route. Tolls penalize drivers who would otherwise add interstate commerce to our local economy. The tolling impediment discourages interstate commerce and drives a wedge between the two sides of our currently united metropolis. Spending billions to harm the financial well being of this area would do far more harm than good.
- Tolling is unwanted by citizens. Three different levels of tolls are being discussed "if" federal authorities approve multiple plans under consideration by both the IBR, ODOT and Portland transportation officials. The IBR wants tolls to cross the bridge. ODOT additionally wanted "per mile" road usage charges, via a recently canceled Regional Mobility Pricing Program.[49] Oregon legislators say tolling is still alive[50]. They have estimated tolls could be in excess of $30 per day for a round trip from Vancouver to Wilsonville.[51]
- A Feb. 2024 public opinion poll revealed 76 percent of citizens overall in the 3 Portland metro counties (excluding Clark County in WA) reject tolling. The highest rejection was in Clackamas County with 91 percent of people opposed[52].
- ODOT revealed an initial 83-86 percent "cost of collection" for I-205 tolls, triggering greater outrage among citizens.[53]
- Federal law prohibits tolling on existing roads unless new lanes and vehicle capacity are being added. The Oregon I-205 tolling project would be the first location in the nation to have tolls on existing pavement, when no new lanes or vehicle capacity is being built. Citizens view the IBR as allowing the camel's nose into the tent for expanded tolling in the near future.

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[48] IBR adds new transit options
https://www.clarkcountytoday.com/news/ibr-adds-new-transit-options-for-consideration-to-new-bridge-over-columbia-river/
[49] Kotek cancels RMPP
https://www.clarkcountytoday.com/news/oregon-gov-kotek-kills-i-5-i-205-per-mile-tolling-but-proposed-i-5-bridge-tolls-remain/
[50] OPB - Tolling is still on the table -
https://www.opb.org/article/2024/03/12/plan-to-add-tolls-portland-oregon-highways-dead-for-now/
[51] Joe Cortright
https://www.clarkcountytoday.com/opinion/opinion-driving-between-vancouver-and-wilsonville-at-5-p-m-odot-plans-to-charge-you-15/
[52] DHM Public Opinion Survey https://westlinnoregon.gov/citycouncil/i-205-regional-tolling-survey-results
[53] 83-86% Cost of Collection
https://www.clarkcountytoday.com/news/odots-86-percent-cost-of-collecting-tolls-on-i-205-revealed/

- The IBR finance plan seeks at least $1.2 billion in tolling revenue and potentially $1.6 billion. Eliminating the $2 billion light rail component and building a $50 million (or less) BRT option would eliminate the need for tolling. By law, federal funds (FTA) can pay a maximum of 50 percent[54] of the light rail cost.
- Oregon Congresswoman Lori Chavez-DeRemer introduced the **No Tolls on Oregon Roads Act** that would prohibit the use of federal funds for tolling on I-5 and I-205 and prohibits the U.S. Department of Transportation (USDOT) from approving I-5 and I-205 tolling projects.[55]
- Congresswoman Chavez-DeRemer believes there was a flawed Draft I-205 Environmental Assessment (EA); ambiguity over multiple tolling proposals; failed ODOT public outreach and a host of other problems.[56]
- "Replacing the I-5 Interstate Bridge is a solution for nothing" according to the Cascade Policy Institute.[57]
- Other viable options, including a 3rd bridge or a tunnel[58] were improperly evaluated and discarded without proper screening and community input[59]. Local civil engineers have proven the IBR issued an intentionally flawed report and evaluation of an immersed tube tunnel option. The IBR was off by a factor of four regarding excavation and required depths.[60]
- Traffic diversions will be horrendous for local communities. A CRC evaluation showed 35,000 vehicles diverting to I-205 due to Interstate Bridge tolls[61]. ODOT evaluated the impacts of tolling in 2017-2018 and predicted 130,000 total vehicle diversions once tolls were placed on all Portland area freeways.[62]
- The "cost of collection" for tolls can be extremely high[63]. It's an inefficient system for raising transportation dollars. In the Seattle area on I-405, the cost of collection was 68

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[54] Federal Register https://www.federalregister.gov/documents/2022/04/28/2022-09143/notice-of-fta-transit-program-changes-authorized-funding-levels-and-implementation-of-the

[55] Congresswoman Chavez-DeRehmer Chavez-DeRemer Introduces Legislation to Kill Oregon Tolling Permanently | Representative Chavez-Deremer (house.gov)

[56] Congresswoman Chavez-DeRemer Lori_Chavez_DeRemer_Digital_Letterhead (house.gov)

[57] John Charles, Cascade Policy Institute https://cascadepolicy.org/transportation/replacing-the-i-5-interstate-bridge-is-not-a-solution-for-anything/

[58] Bob Ortblad https://www.clarkcountytoday.com/opinion/letter-retraction-required-due-to-conflict-of-interest/

[59] Bob Ortblad - Immersed Tube Tunnel option https://bikeportland.org/2022/02/23/the-overlooked-i-5-columbia-crossing-option-an-immersed-tube-tunnel-348880

[60] Clark County Today - Is a tunnel actually viable? Is a tunnel actually viable for crossing the Columbia River? | ClarkCountyToday.com

[61] Robert Liberty data https://www.clarkcountytoday.com/news/when-the-facts-dont-jive-with-the-data-on-the-interstate-bridge-replacement/

[62] You're actually going to make things worse – https://www.clarkcountytoday.com/news/tolling-youre-actually-going-to-make-things-worse/

[63] WSTC https://www.clarkcountytoday.com/news/state-tolling-revenues-down-158-million-due-to-pandemic-with-464-million-drop-over-decade/

percent[64].The gas tax has under a one percent cost of collection. Furthermore, the entire Washington state tolling system needed to be bailed out by General Fund revenues from the legislature for 3 years.

- The Draft Supplemental Environmental Impact Statement (DSEIS) is two years late in its release[65]. Multiple facets of the document are inaccurate and incomplete[66]. Continuing to fund a project that can't meet transparency and environmental requirements is a waste of federal and state dollars.
- The DSEIS reveals the program will save a miniscule 31 metric tons (MT) of CO2 per day, in spite of claims the project is "green". It will take over 41 years to recover construction CO2[67]. Furthermore, the project will increase daily Vehicle Miles Traveled (VMT) in direct opposition to goals of both states requiring a reduction in VMT.
- Doing nothing would save 11 minutes on C-Tran's "Express" bus service to Portland, when compared to building the LPA. Multiple facets of the proposed project contradict various environmental goals.
- The "seismic risk" to the current structure has been blown out of proportion. The real experts at the M9 Project (Univ. of Washington) predict only a 10-14 percent chance of a magnitude 9 earthquake happening in the next 50 years. That means there's an 86 - 90 percent chance a major earthquake that would destroy the bridge will not happen in the next 50 years.[68]

The IBR program is proposing to spend between $5 billion and $7.5 billion (current price) replacing the two steel Interstate Bridge structures across the Columbia River. One bridge is 34 years younger than the Brooklyn Bridge and the other is 75 years younger. In 1958 the original bridge received a significant structural upgrade. Nobody would think of destroying the Brooklyn Bridge. Why destroy the two Interstate Bridge structures? They are on the National Historic Register. The oldest steel bridge still in use in the U.S. was built in 1838.[69]

When you visited the Portland area July 7th, you spoke about saving time being the most important aspect of the Washougal rail crossing project the DOT is funding. From a local news report[70]:

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[64] Clark County Council https://www.clarkcountytoday.com/news/county-council-discussion-on-tolling-interstate-bridge-and-oregon-freeways-centers-on-the-need-for-the-plan-to-be-project-specific-and-time-limited/

[65] DSEIS is 2 years behind schedule https://www.clarkcountytoday.com/opinion/opinion-the-interstate-bridge-replacement-is-two-years-behind-schedule/

[66] What the IBR doesn't want you to know https://cityobservatory.org/what-ibr-doesnt-want-you-to-know/

[67] Faux "green" IBR revealed https://www.clarkcountytoday.com/news/the-faux-green-interstate-bridge-replacement-proposal/

[68] What is the seismic risk https://www.clarkcountytoday.com/news/what-is-the-seismic-risk-of-the-cascadia-subduction-zone-and-earthquakes-in-the-pacific-northwest/

[69] Dunlap's Creek Bridge, PA .https://www.aisc.org/nsba/timeline/

[70] Buttigieg asked where's the value https://www.clarkcountytoday.com/news/dot-secretary-pete-buttigieg-asked-wheres-the-value-in-the-i-5-bridge-replacement-project/

"Buttigieg spoke about people's most valuable commodity being time, and the Washougal project will help people in that community save time. "That's why this matters so much," he said. But he also spoke of building transportation projects that will "serve our children and our grandchildren".

This is extremely relevant to the IBR because the proposed Locally Preferred Alternative does not save people time. Period.

Presently, the morning commute time from north Vancouver to Portland's Fremont Bridge takes 29 minutes. The IBR predicts in 2045 it will take 60 minutes. The IBR proposes to replace an over congested 3-lane bridge with another 3-through lane bridge (and one auxiliary lane). If they did nothing (saving $7.5 billion), the "no build" travel time would be 63 minutes.

The IBR reports 28 percent of rush hour vehicles are going zero to 20 mph today. After building the LPA, they predict congestion to worsen to 50 percent of rush hour traffic traveling zero to 20 mph. In addition to failing to improve congestion, environmental pollution will worsen proportionally. Tens of thousands of vehicles stuck in stop and go traffic is horrible for the environment. It fails to save people time which you correctly identified as the most important thing to people.

Oregon State Senator Lew Frederick asked IBR Administrator Greg Johnson "how much time will people save?" Johnson's response - "not much".[71]

The I-5 Interstate Bridge is part of a critical trade route for regional, national and international commerce. The real "stop light" for the entire I-5 transportation corridor in the Portland metro area is not the Interstate Bridge but Portland's Rose Quarter, where I-84 merges with I-5. The interstate narrows down to just two lanes where the two interstates merge in the heart of the city. True insanity from a freeway transportation system standpoint. This is the only 2-lane section of I-5 in an urban area from Canada to Mexico.

In a 2003 Portland/Vancouver I-5 Transportation & Trade Partnership, ODOT Director Bruce Warner offered the following comparison of river crossings. Portland has two highway crossings and one rail crossing of the Columbia River.

Norfolk had 4 highway crossings & zero rail crossings. Cincinnati had 10 highway crossings and 2 rail crossings. Kansas City had 10 highway crossings and 3 rail crossings. Pittsburgh had over 30 highway crossings and 3 rail crossings. St. Louis had 8 highway crossings and 2 rail crossings.

By any measure, the Portland metro area was behind 21 years ago. We're further behind today with no plans for a 3rd or 4th bridge.

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[71] Clark County Today
https://www.clarkcountytoday.com/news/bi-state-legislative-committee-reviews-interstate-bridge-progress-and-issues/

Transportation architect Kevin Peterson has worked on transportation systems including transit, all over the world. He called the Rose Quarter "the elephant in the room" regarding traffic congestion for the I-5 corridor. Peterson evaluated the project's traffic projections (2005 and 2008) and offered the following conclusions.

"The I-5 transportation corridor will need at least 5 lanes in each direction in 2030, 2 to 4 years prior to the opening of the IBR's LPA proposal. The corridor will need at least 7 lanes in each direction by 2045, the date the IBR uses for travel time and traffic congestion comparisons. By 2065, the I-5 corridor would need at least 9 lanes in each direction."

Oregon's Cascade Policy Institute recently noted: "The Interstate Bridge Replacement Project, now in its 26th year of planning, will have no effect on traffic congestion because it doesn't add capacity. We will still have only two bridges over the Columbia River in the Portland region."[72] They also note congestion relief has been the people's top priority for 30 years. Yet it will get worse because the Metro regional government doesn't care what the people want.[73]

PEMCO reported (2018) that 94 percent of people want to use their privately owned vehicles for transportation. An April 2019 Oregon Transportation Commission survey found 51 percent of citizens want to "expand and improve interstates and interstate bridges." Another 14 percent want expanded arterials[74]. Two out of three people want added vehicle capacity as their top transportation priority.

Former Metro Councilor and senior counsel to Oregon's Congressman Earl Blumenauer Robert Liberty spoke out against the program. He noted in 2005, the Columbia River Crossing traffic analysis showed no difference between the "no build" and spending $3.6 billion on the CRC's LPA, in terms of number of vehicles traveling on the two transportation corridors across the Columbia River. Liberty believed it was not worth the money, then or now.[75]

"Replacing the I-5 Interstate Bridge is not a solution for anything," states the Cascade Policy Institute.[76] "*The entire I-5 corridor from Wilsonville to Vancouver is over-subscribed for about 12 hours per day, and this will only get worse as the region grows.*

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[72] Cascade Policy Institute Oregon's highway freeze is not about the weather
https://cascadepolicy.org/transportation/oregons-highway-freeze-is-not-about-the-weather/

[73] Cascade Policy Institute Metro gives up on reducing traffic congestion
https://cascadepolicy.org/transportation/metro-gives-up-on-reducing-traffic-congestion/

[74] Clark County Today - A data driven response
https://www.clarkcountytoday.com/opinion/opinion-a-data-driven-response-to-governors-inslee-and-brown/

[75] When the facts don't jive - Clark County Today
https://www.clarkcountytoday.com/news/when-the-facts-dont-jive-with-the-data-on-the-interstate-bridge-replacement/

[76] Cascade Policy Institute Replacing the I-5 bridge is not a solution for anything
https://cascadepolicy.org/transportation/replacing-the-i-5-interstate-bridge-is-not-a-solution-for-anything/

The Interstate Bridge should be left alone for now, and ODOT should be directed to start planning for two new bridges – one upstream from the Glenn Jackson I-205 Bridge, and one downstream from the I-5 Interstate Bridge. The new crossings would eliminate most congestion on the existing bridges, while providing essential redundancy in the event of a catastrophic earthquake.

The Cascade Policy Institute recommendation mirrors the 2008 Regional Transportation Council (RTC) "Visioning Study"[77], planning for when Clark County, WA reached 1 million in population. They identified the need for two new bridges and offered two options for each location. Over 100,000 people have moved into the county, now at about 525,000. No planning is under way for even a single new crossing. Another 190,000 are projected by 2045 according to the Clark County Transportation Alliance.[78]

A single bridge and transportation corridor will not solve traffic growth and congestion problems. A 3rd and 4th bridge (or tunnel) across the Columbia River are needed. That's what the data shows. It makes no sense to fund the replacement of a 3-lane bridge with another 3-lane bridge that will immediately be congested the day it opens.

The Cascade Policy Institute mentioned "No other type of infrastructure is artificially constrained this way. When public schools experience a growth in students, school districts build or buy more classroom space. Regional drinking water providers spend billions of dollars on new pipes and treatment facilities to accommodate growth. Only highways are subject to scarcity by design."[79]

A 2011 CRC Traffic Technical Report showed essentially no difference in the number of vehicles using the I-5 and I-205 corridors after completing the CRC's Locally Preferred Alternative, than would be under the "no build" option. The expenditure of $3.6 billion would deliver no improvement in vehicle capacity and throughput.

The CRC lied about the number of jobs created[80]. The IBR is painting similar rosy pictures of economic opportunities, without legitimate substantiation. The CRC was labeled "A bridge too false[81]". Most of the case for the $3.6 billion Columbia River Crossing wasn't true. The same can be said about the Interstate Bridge Replacement Program.

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[77] RTC Visioning Study
https://www.clarkcountytoday.com/news/regional-transportation-council-urged-to-revisit-2008-transportation-corridors-visioning-study/
[78] 2025 Clark County Transportation Alliance Policy Statement
[79] Cascade Policy Institute
https://www.clarkcountytoday.com/opinion/opinion-metro-gives-up-on-reducing-traffic-congestion/
[80] A lie times ten Not True, Times Ten (wweek.com)
[81] A Bridge too False A Bridge Too False (wweek.com)

The “seismic risk” is not a current threat. The 6.8 Nisqually Quake in 2001 did no damage to any Portland area bridges.[82] The second Interstate Bridge structure was completed in 1958, just 8 years prior to the completion of the I-5 Marquam Bridge just 7 miles south of the project in Portland. These structures are deemed “safe” by both ODOT and WSDOT.

Randall O’Toole has been examining transit for decades and is known as the “Anti Planner.” He talks about “strategic misrepresentation” as a form of lying on light rail and these mega projects. He notes they over-project transit ridership and under-estimate costs in a 2022 column, Lie Rail Supporters Keep On Lying.[83]

Almost every light-rail project ever built has cost far more than the original projections. Cost overruns are so systematic that Oxford researcher Bent Flyvbjerg says they are “best explained by strategic misrepresentation, that is, lying.”[84] Other lies included overestimated ridership numbers and the claim that light rail is “high-capacity transit.”

“In the world of civic projects, the first budget is really just a down payment. If people knew the real cost from the start, nothing would ever be approved. The idea is to get going. Start digging a hole and make it so big there’s no alternative to coming up with the money to fill it in.” San Francisco Mayor Willie Brown[85].

A 2022 article by Charles Marohn in the publication Strong Towns, shows how the game is played. He calls it “engineering malpractice.” He also labels seeking public input: “engagement theater.”[86] The IBR has been full of engagement theater, creating the appearance of reaching out to citizens, but ignoring their input.

The Portland MAX light rail is currently limited by almost all trains needing to cross the 1912 Steel Bridge over the Willamette River. During rush hour, there is a light rail train crossing the bridge every 90 seconds. There is no ability for TriMet to add additional light rail trains to expand light rail service for the IBR or any other route. Furthermore, the Yellow Line only travels at 14 mph - far too slow to be a viable alternative for interstate commuters.
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Additionally, “when” the major earthquake hits, the Steel Bridge in Portland will be damaged or destroyed, eliminating light rail service as a transportation option. One possible “solution” would be to underground the MAX light rail via a tunnel under the Willamette River or to build a separate, new seismically sound bridge. TriMet is currently evaluating a tunnel option, but has no plans or ability to fund the tunnel.

TriMet’s MAX light rail is limited to just 2 light rail cars in a train, due to the short length of a downtown Portland block. Adding a 3rd or 4th light rail car would block downtown Portland

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[82] Nisqually Quake https://en.wikipedia.org/wiki/2001_Nisqually_earthquake
[83] Randall O’Toole http://ti.org/antiplanner/?p=19978
[84] Brent Flyvbjerg http://americandreamcoalition.org/transit/Flyvbjerg02.pdf
[85] Desperate Rail Gambit https://www.city-journal.org/article/desperate-rail-gambit
[86] Engagement Theater
https://www.strongtowns.org/journal/2022/4/4/ignoring-induced-demand-is-engineering-malpractice

intersections, bringing traffic movement to a standstill. Until the light rail is either underground (a subway) or elevated, this restriction will remain the achilles heel of MAX to truly grow their light rail system.[87]

Voters in both states have rejected light rail. In 2019, Oregon voters rejected a new TriMet Southwest Corridor light rail line.[88] Clark County voters repeatedly reject light rail.[89] In 1995, Clark County voters rejected light rail.[90] In 2013, 223 out of 228 Clark County precincts rejected the CRC and its light rail and tolls[91].

The CRC and now the IBR is “a light rail project in search of a bridge”. These were the words of an Oregon Supreme Court Justice. Gov. Jay Inslee told citizens “no light rail, no bridge” in 2014. Representative Earl Blumenauer in 2019 demanded light rail or nothing. “It's a deal breaker unless it's there”[92]

An I-5 Transportation Trade Partnership report[93] two decades ago said: "Oregon interests required emphasis on a multi-modal solution * * * because of the difficulty of accommodating [traffic] demand through a highway-only expansion of I-5," Clark County interests "needed a highway element because the land use patterns of Clark County require[] a system with greater dependence on auto access." They said a 10-lane bridge performed the best.

In 2010, “Metro staff developed a forecast of the growth that would be induced by a full build out of the CRC project, with a 10-to-12-lane bridge, light rail line and $2 rush-hour tolls each direction.”[94]

C-TRAN’s operating costs for its BRT system are 34 percent cheaper than the operating costs (per boarding rider) for the MAX light rail. TriMet’s MAX costs are $8.24 versus C-TRAN’s $5.44 BRT cost per boarding passenger.[95]

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[87] Metro MAX Tunnel Study MAX Tunnel Study Findings.pdf (oregonmetro.gov)
[88] Oregon Public Broadcasting
https://www.opb.org/article/2020/11/04/metro-tax-light-rail-portland-pass-fail-result/
[89] Congresswoman Jaime Herrera Beutler
https://www.clarkcountytoday.com/news/opposition-to-ibr-light-rail-and-tolling-follows-two-meetings-of-bridge-leadership/
[90] CRC is Rail Project http://www.debunkingportland.com/crc-is_rail_project.html
[91] Resurrecting the Columbia River Crossing
https://www.thereflector.com/stories/resurrecting-the-columbia-river-crossing,47643
[92] Blumenauer demands light rail
https://www.wweek.com/news/state/2021/04/10/u-s-rep-earl-blumenauer-says-its-light-rail-or-bust-for-next-columbia-river-bridge/
[93] I-5 Transportation Trades Partnership
https://data.wsdot.wa.gov/accountability/ssb5806/Repository/2_Long%20Range%20Planning/I-5%20Partnership/Summary%20Documents/Summary.pdf
[94] Metro finding on Columbia River Crossing
https://www.oregonmetro.gov/news/metro-finds-columbia-river-crossing-toll-bridge-with-light-rail-would-have-negligible-impact-on-growth
[95] When the facts don’t jive with the data
https://www.clarkcountytoday.com/news/when-the-facts-dont-jive-with-the-data-on-the-interstate-bridge-replacement/

The current proposal which mirrors the failed Columbia River Crossing, is loaded with unnecessary pork barrel spending for the $2 billion light rail component. They demand 19 new light rail vehicles for a 1.9-mile extension of an existing line.[96] TriMet's recent "Better Red" 10-mile light rail extension only added four new light rail vehicles. An unneeded expansion of TriMet's Gresham maintenance facility is also included, which is roughly 10 miles outside the project area. TriMet is replacing 19 worn out light rail cars in this project that will serve their entire light rail system, not the project's proposed 1.9 mile extension of a current line.

This appears to be fraudulent misrepresentation at best. Washington taxpayers should not be footing any of the bill for replacement of 13 percent of TriMet's 145 vehicle light rail fleet, nor paying for any of their maintenance facilities in Gresham. The federal government should not be paying this as part of the IBR funding. The state of Oregon can bail out TriMet with other local funds if they want to do so.

The US Census Bureau reports that people using mass transit to commute to work remains 38 percent below pre pandemic levels. Put another way, 97 of 100 Americans do not use mass transit for daily trips. Both Portland's TriMet and Clark County's C-TRAN report transit ridership is only about half the peak more than a decade ago.[97]

In a 2023 survey conducted by TriMet, 60 percent of people who use the transit system at least several times a week would not recommend the metro area's transit system to a friend or family member. The same survey also found and a majority of TriMet riders in the survey cited other riders' behavior as a reason they feel unsafe while riding.[98]

O'Toole supports a polycentric transportation system. "While TriMet carried 42 percent of downtown workers to and from their jobs in 2018, downtown held less than 10 percent of all jobs in the urban area. Outside of downtown, TriMet carried just 3.4 percent of workers to and from their jobs. Though Portland has been celebrated as "the city that loves transit," the reality is that TriMet provides terrible service to 90 percent of the region's workers and job centers."[99]

He notes Hillsboro had 83,000 jobs, Beaverton had 64,000 and Gresham more than 37,000. Downtown Portland currently has the highest office vacancy rate in the nation.[100] O'Toole recommends a nine-hub system with up to five buses per hour. It would cost no more than TriMet is spending on bus operations. Furthermore, "average bus speeds would nearly double, and speeds between hubs would be nearly triple light-rail speeds, thus attracting far more riders than TriMet is carrying today."

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[96] TriMet Gresham MX facility part of IBR https://www.clarkcountytoday.com/news/trimet-gresham-maintenance-facility-expansion-part-of-ibr/
[97] Transit Ridership Down Nationally and Locally https://www.clarkcountytoday.com/news/national-and-local-transit-ridership-down-significantly-feds-report/
[98] TriMet Unsafe https://www.kptv.com/2024/05/20/be-seen-be-heard-portland-is-trimet-safe/
[99] Randall O'Toole https://cascadepolicy.org/reports/press-release-trimet-in-the-twenty-first-century/
[100] Downtown Portland has highest office vacancy rate Downtown Portland's office vacancy rate is highest in the nation, report says - oregonlive.com

In 2019, both Governors Inslee and Brown promised to be “data driven” when signing their memorandum restarting the project.[101] A month later, Oregon and Washington legislators were provided with a host of data laying out the issues, and showing what needs to be done to reduce traffic congestion and save people time.[102]

Voters also don’t want tolling as a means of funding either the IBR or on Oregon freeways. Currently, Oregon citizens are collecting signatures for IP-4 (now IP-31), which will require a Vote Before Tolls can be placed on any Oregon road.[103] This was expected to be on the November 2024 ballot until Oregon Governor Tina Kotek issued an Executive Order prohibiting ODOT from collecting tolls until at least January 2026.[104] In March, the Governor canceled the RMPP tolling and paused everything else except IBR tolling discussions[105].

The IBR incorrectly discounted the option of an immersed tube tunnel as a possible alternative. Engineer Bob Ortblad revealed the IBR over-estimated the amount of dredging required by a factor of four. The IBR said they would need to remove almost 8 million cubic feet of materials and dredge to a depth of 80 feet. Ortblad’s calculations indicate at most 2 million cubic feet of dredging material and a depth of only 45 feet.

Portland economist Joe Cortright notes the IBR is using the least accurate traffic forecast, of three they have on record. “IBR relies on Metro’s Kate Model, which has an error factor of 14.5 percent and which over-estimates I-5 traffic by almost 20 percent.

IBR’s DSEIS makes no mention of the Stantec Level 2 forecast (with an error factor of 2.5 percent), or the CDM Smith Investment Grade Forecast (with an error factor of 0.8 to 2.5 percent)[106].”

Improper consideration of various alternatives should disqualify the project from federal funding consideration. Allowing grossly inflated transit ridership numbers (30 to 50 fold) should disqualify the project from consideration, and speaks to the lack of professionalism of project leaders.

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[101] Governor’s sign Memorandum of Intent
https://www.clarkcountytoday.com/news/governors-of-oregon-and-washington-sign-agreement-over-interstate-5-bridge-replacement/
[102] A Data Driven Solution to OR & WA legislators
https://apps.oregonlegislature.gov/liz/2019I1/Downloads/CommitteeMeetingDocument/208569
[103] Vote Before Tolls https://votebeforetolls.org/
[104] Willamette Week Gov. Pauses Tolling Kotek Makes It Official: She’s Ordered ODOT to Pause Tolling Until 2026 (wweek.com)
[105] Koteck cancels per mile tolls
https://www.clarkcountytoday.com/news/oregon-gov-kotek-kills-i-5-i-205-per-mile-tolling-but-proposed-i-5-bridge-tolls-remain/

[106] IBR’s DSEIS uses least accurate forecast
https://cityobservatory.org/ibrs-dseis-uses-the-least-accurate-forecast/

In 2014, the region was offered a “fixed price” bridge over the Columbia River east of the I-205 bridge for $860 million.[107] This demonstrated that a cost effective bridge could be built, saving taxpayer dollars and adding vehicle capacity over the river. Transportation architect Kevin Peterson estimated a 3rd bridge would reduce I-205 congestion by 15-20 percent.

The current bridge structures could be repurposed as a “local” connection, for slower moving vehicles and serve as a “collector distributor” envisioned in FHWA requirements. It would allow for a nearly level structure (compared to the much higher IBR LPA) for pedestrians, bicyclists, and transit. This would save roughly $200 million or more for the demolition and dismantling of the historic bridge structures.

Either an “express” bridge over the river or an ITT would add vehicle capacity to the I-5 corridor. That added capacity would reduce traffic congestion. A third bridge west of I-5 would add capacity, remove many freight haulers from the current bridge, and provide flexibility and redundancy. Portland has a dozen bridges over the Willamette River. We need more than two bridges over the Columbia River in the Portland-Vancouver metro area.

The IBR’s Greg Johnson says “you cannot build your way out of traffic congestion.” You certainly won’t if you’re refusing to try. ODOT proved him wrong by eliminating four hours of congestion on I-5 south of Portland simply by adding an auxiliary lane from OR 217 to I-205.

ODOT was proposing to add one lane to I-205 for a 7-mile stretch of the freeway. They project it will reduce traffic congestion from 14 hours a day to just 2 hours a day, as part of their Abernethy Bridge I-205 project[108]. Sadly, ODOT’s inability to manage transportation project costs has caused them to either pause or cancel multiple Portland area transportation projects, including the 7 miles of new freeway lanes on I-205.[109]

WSDOT just proved Johnson wrong as well. The addition of one new lane eastbound on SR-14 and two lanes westbound, has eliminated traffic congestion on a 2-mile section of this state highway in Vancouver.[110]

For roughly 50 years, over 20 reasonable ideas have been proposed for new crossings of the Columbia River according to local citizen Chuck Green. *“The I-205 Bridge was opened almost 40 years ago. Since that time: Clark County’s population has grown 261 percent.*

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[107] East County Bridge https://eastcountybridge.com/proposal/
[108] ODOT I-205 tolling effort moves forward https://www.clarkcountytoday.com/news/odot-i-205-tolling-effort-moves-forward-projecting-a-12-hour-reduction-in-traffic-congestion-by-2045/
[109] ODOT Indefinitely Pauses I-205 Projects OR tolling: I-205 Improvements Project indefinitely paused (koin.com)
[110] SR-14 lane addition eliminates traffic congestion https://www.clarkcountytoday.com/news/sr-14-lane-addition-eliminates-traffic-congestion/

Cross-Columbia River vehicle traffic has grown 239 percent. Cross-River Transportation Capacity has grown 0 percent.[111]

In summary, the IBR is far too expensive with an unknown cost increase to be revealed in a year. It fails to fix the one problem people want solved – saving time and reducing traffic congestion. After spending more than $7.5 billion, people will waste at least an additional 30 minutes being stuck in traffic congestion each morning. That would add 125 hours a year of lost time for hard-working citizens.

The proposal is “a bridge too low”, failing to meet the current let alone future needs of our maritime industry. The Coast Guard demands a bridge at least 62 feet higher. The IBR wastes one quarter of the money on a light rail extension that cannot carry enough people and travels too slow. Voters have rejected it multiple times. Why spend $7.5 billion on the IBR when $1 billion (perhaps $2 billion with current inflation) would do. (The Hood River bridge replacement over the Columbia River was $520 million).

Project leaders are misleading the community regarding multiple aspects of the project and disregarding legitimate transportation needs. It’s been over 40 years since new vehicle capacity and transportation corridors were added to the region. Let’s not waste valuable federal dollars on a project that does nothing to help the average citizen.

What is needed are new bridges and transportation corridors as part of a polycentric transportation system. Portland has a dozen bridges over the Willamette River. We need more than two bridges over the Columbia River. This is the only way to reduce traffic congestion and improve freight mobility.

Every major city in the world has numerous “ring roads” for traffic to bypass the crowded inner core. That practical logic must be applied to the Portland metro area. Serve the people and deliver legitimate value for taxpayer dollars by demanding the two new bridges over the Columbia River identified multiple times over the past 30-50 years. Most recently, the Regional Transportation Council “Visioning Study” (2008) identified the need for two additional bridges over the Columbia River, connecting Portland and Vancouver[112].

“Interstate freeways, classified as divided principal arterials, are designed to provide for the highest degree of mobility of large volumes of long-distance traffic,” according to a Regional Transportation Plan. “Collector facilities generally provide equal emphasis upon mobility and land use accessibility.”

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[111] Clark County Today - Chuck Green ideas ignored for crossings
https://www.clarkcountytoday.com/news/how-many-ideas-have-been-proposed-over-the-years-for-multiple-crossings-of-the-columbia-river/

[112] Interstate Bridge reached peak capacity in early 1990’s
https://www.clarkcountytoday.com/news/interstate-bridge-reached-peak-capacity-in-early%e2%80%901990s-and-the-glenn-jackson-bridge-did-so-in-the-mid%e2%80%902000s/

Peak lane usage on the I-5 Interstate Bridge is between 4,000 and 5,500 vehicles per hour on an over congested freeway. The I-205 Glenn Jackson Bridge can handle between 6,000 and 7,200 vehicles per hour because it has four lanes each direction instead of three lanes.

An average lane handles about 2,000 vehicles per hour at freeway speeds. Due to congestion, the Interstate Bridge carries at least 1,000 fewer vehicles due to traffic. The Glenn Jackson bridge handles 800 to 2,000 fewer vehicles at peak travel times.

Mr. Secretary as you said, saving time is people's most valuable commodity. Let's fund a project which actually delivers exactly that, not the current proposed Interstate Bridge Replacement project. The Locally Preferred Alternative is actually not "preferred" by average citizens, but special interests with political ties.

Please stop funding any aspect of the current IBR. There is no value for hard-working citizens on both sides of the Columbia River.

Sincerely,

John Ley
Concerned citizen
[redacted]

CC: Oregon Gov. Tina Kotek
Washington Gov. Jay Inslee
Greg Johnson – IBR Administrator

November 18, 2024

The Honorable Pete M. Buttigieg
Secretary of Transportation
U.S. Department of Transportation
1200 New Jersey Ave, SE
Washington, DC 20590

Subject: I-5 Interstate Bridge Citizen Comments DSEIS

Dear Secretary Buttigieg:

I am writing in opposition to the I-5 Interstate Bridge Replacement program's (IBR) application for federal funding. This includes The National Infrastructure Project Assistance (MEGA) discretionary grant program, the Bridge Investment Program and FTA Capital Investment Grant funding via the Infrastructure Investment and Jobs Act (IIJA) or other federal funding sources. Many citizens in the Portland metropolitan area oppose the current proposal.

Where's the value? Truly. What problem does this expenditure of perhaps $10 billion taxpayer dollars solve? How much traffic congestion will be eliminated? Is "replacement" reasonable? Is the proposal actually "green" in terms of saving carbon emissions? This is the largest public works project in the history of the Portland metro area.

Would taxpayers replace the Brooklyn Bridge; or would they maintain and upgrade it as a valuable historical structure? What alternatives have been ignored or cast aside? What level of transit is needed to serve expected ridership? Can any form of transit actually generate significant ridership for the money expended, to justify a huge transit expenditure that exceeds one quarter of the cost of the project?

The project fails to solve the people's number one priority – saving time and reducing traffic congestion. Both commute times and traffic congestion will get worse in the Locally Preferred Alternative (LPA).

The Purpose and Need of the project lists six items to be addressed. 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.[1] The proposed LPA fails to adequately solve the top two items: traffic congestion and freight mobility.

This is a federal interstate highway. Its purpose is to enhance the movement of people and freight over long distances, to improve interstate and international commerce. The "solution" should fit the purpose. Portland has the 7th worst traffic congestion in the nation because they have refused to add vehicle capacity for the past 4 decades. This project does nothing to reduce

[1] IBR Draft SEIS https://justcrossing.org/sdeis-pre-release/ibr_draft_seis_1-00_pan_rev2_clean.pdf

congestion or save people and freight haulers time. Hours of congestion will increase by 30 percent after the completion of the project[2].

Instead, the proposal allocates 54 percent of the bridge surface to bikes, pedestrians and mass transit[3]. Only 46 percent is allocated to cars and freight haulers. Over one quarter of the current cost is for the transit component.

“General purpose” traffic makes up over 89 percent of current crossings, with another nearly 9 percent freight haulers. Transit makes up less than two percent of bridge traffic, with “active transportation” (bikes and pedestrians) a rounding error at 0.2 percent[4]. For 98 percent of the current crossings to be allocated just 46 percent of the proposed bridge space is beyond ridiculous.

How often can program administrators, politicians, and bureaucrats tell lies or half-truths, cherry-picking “facts” to suit a predetermined “solution”, before the federal transportation agencies refuse to fund a project? Taxpayers expect government agencies to stick to legitimate, demonstrable standards that enforce rules and actually solve transportation problems.

There is evidence of at least one agency trying to fleece taxpayers. Portland’s TriMet is demanding 19 new light rail vehicles for a 1.9 mile extension of an existing line. Furthermore, they plan to charge somewhere between $10 million and $15 million per vehicle, when they just paid $4.5 million each for four new light rail vehicles on a 10-mile extension. The response from the IBR team – we just accept whatever the local agency gives us.[5]

There is a “new normal”[6] where people work from home, drive their privately owned vehicles, and avoid using mass transit in commuting to work. Nationally and locally, transit ridership is down significantly.[7] We need a project that addresses reality and saves people time, not wishful thinking or a special interest bailout of Portland’s TriMet transit agency.

A summary of citizen objections are as follows:

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[2] Traffic congestion to increase by over 3 hours
https://www.clarkcountytoday.com/news/traffic-congestion-to-increase-by-over-three-hours-after-7-5-billion-interstate-bridge-replacement-project/
[3] Over half bridge proposal allocated to transit, bikes and pedestrians
https://www.clarkcountytoday.com/news/over-half-interstate-bridge-proposal-allocated-to-transit-pedestrians-and-bicyclists/
[4] IBR adds new transit options
https://www.clarkcountytoday.com/news/ibr-adds-new-transit-options-for-consideration-to-new-bridge-over-columbia-river/
[5] Bridge management defends TriMet’s excessive demands
https://www.clarkcountytoday.com/news/bridge-management-defends-trimets-excessive-demands-for-project/
[6] RTC “New Normal”
https://www.clarkcountytoday.com/news/rtc-says-new-normal-for-low-transit-ridership-and-high-private-vehicle-use/
[7] Transit Ridership Down Significantly
https://www.clarkcountytoday.com/news/national-and-local-transit-ridership-down-significantly-feds-report/

- The cost projection has ballooned about 56 percent in 2 years and only has a “virtual design”. The IBR initially told the community the cost would be in a range of $3.2 to $4.8 billion and is now $5 to $7.5 billion.[8] The program announced in December 2023 the cost will be rising again.[9]
- IBR Administrator Greg Johnson recently admitted updated cost projections will not occur “until this time next year”[10], or June of 2025. An 18-month delay in updating costs is outrageous and fails to let citizens provide input on the impact of rising cost projections.
- The cost of the Hood River-White Salmon Bridge over the Columbia River just exploded 215 percent[11], adding to citizens' concerns about the future cost of the IBR.
- The transit component will be the most expensive rail project in the world, on a “per mile” basis. The IBR is seeking $2 billion for a 1.9 mile TriMet MAX light rail extension, or one billion per mile.[12] They demand an upgrade to their Gresham vehicle maintenance facility, over ten miles from the project area..
- The current proposal spends 10 to 15 times what is needed. The two states will build a bridge over the Columbia River at Hood River for $520 million[13] (now exploding to $1.12 billion). The IBR says the cost to replace just the bridge is $500 million, or 6.6 percent of the entire project.[14]
- Less than half the structure is dedicated to vehicles and freight haulers. The IBR reports 54 percent of the structure will be allocated to transit, bikes and pedestrians[15]. This is an interstate freeway, supposedly dedicated for national, international and regional commerce. It’s not a recreation area.
- The IBR is proposing nothing more than a rebranded Columbia River Crossing (CRC) which was rejected a decade ago because it was “a bridge too low”, it had tolls, and was

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[8] Clark County Today
https://www.clarkcountytoday.com/news/what-good-is-a-shiny-new-bridge-when-our-kids-cant-safely-cross-the-street-in-our-neighborhoods/
[9] Joe Cortright - $9 Billion IBR cost
https://www.clarkcountytoday.com/opinion/opinion-it-looks-like-the-interstate-bridge-replacement-could-cost-9-billion/
[10] Updated Costs for Interstate Bridge
https://www.clarkcountytoday.com/news/updated-costs-for-interstate-bridge-wont-happen-until-next-year/
[11] Hood River Bridge cost explodes 215 percent
https://www.clarkcountytoday.com/news/hood-river-bridge-cost-explodes-215-percent/
[12] Clark County Today
https://www.clarkcountytoday.com/news/i-5-bridge-replacement-project-has-the-worlds-most-expensive-light-rail/
[13] Hood River Bridge Authority https://hoodriverbridge.org/about
[14] Joe Cortright - $500 million bridge costs $7.5 billion
https://www.clarkcountytoday.com/opinion/opinion-why-does-a-500-million-bridge-replacement-cost-7-5-billion/
[15] Over Half IBR allocated to transit, bikes and pedestrians
https://www.clarkcountytoday.com/news/over-half-interstate-bridge-proposal-allocated-to-transit-pedestrians-and-bicyclists/

"a light rail project in search of a bridge"[16]. The CRC was a "financial nightmare" according to forensic accountant Tiffany Couch.[17]

- Economist Joe Cortright says the IBR proposal is "a value destroying proposition"[18].
- The US Coast Guard has rejected the IBR request to build a "bridge too low" with only 116 feet of clearance for marine traffic. They appropriately demand a bridge that provides at least the current 178 feet of clearance[19] and prefer "unlimited" clearance.
- The project will not save people time. Travel times will double from Vancouver to Portland by 2045. Furthermore, they predict HALF of rush hour traffic will be stuck going zero to 20 mph after spending $7.5 billion[20].
- Hours of congestion will increase by 30 percent to 13.75 hours daily, if the Locally Preferred Alternative (LPA) is built, comparing 2019 traffic congestion with 2045 projected congestion. The IBR is accepting a "solution" that doesn't solve current congestion problems, and will allow things to get much worse, all while spending over $7.5 billion. Citizens in cars and trucks will have paid tolls for two decades[21] towards the cost, while transit and active transportation users will pay nothing.
- The proposal is bad for the environment. The IBR projects that half of rush hour vehicles will be stuck in congestion traveling zero to 20 mph a decade after completion of the project. Cars stuck idling can emit 20 times more pollution than those traveling 30 mph.[22]
- Almost all of the IBR's projected "carbon emission reduction" comes from people getting out of POVs and riding transit[23]. If people refuse transit, there is no CO2 reduction.
- A miniscule hoped for reduction in vehicle miles traveled (VMT) of 0.55 percent makes up the balance of projected CO2 emissions reduction. Note there never has been a reduction in VMT except for significant economic downturns and the pandemic lockdowns[24].
- Over 25 percent ($2 billion) of the project's cost is tied to a 1.9-mile extension of light rail that almost nobody will ride. It is more than triple the previous cost per mile for Portland's light rail. The MAX Yellow Line travels 14 miles per hour – far too slow for people wanting to save time. Eliminating light rail in favor of Bus Rapid Transit (BRT) would

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[16] The $2.5 Billion bribe The $2.5 Billion Bribe (wweek.com)
[17] Forensic Accountant - CRC a financial nightmare
https://couv.com/sidebar/tiffany-couch-crc-white-paper
[18] Legislators get final update
https://www.clarkcountytoday.com/news/legislators-get-final-update-on-ibr-before-2024-legislature-sessions-begin/
[19] Oregonian - Coast Guard demands higher bridge
https://www.oregonlive.com/commuting/2022/07/coast-guard-demands-higher-replacement-interstate-bridge-in-preliminary-decision.html
[20] Clark County Today
https://www.clarkcountytoday.com/opinion/opinion-adding-new-lanes-reduces-traffic-congestion-on-i-5/
[21] Traffic congestion to increase over 3 hours
https://www.clarkcountytoday.com/news/traffic-congestion-to-increase-by-over-three-hours-after-7-5-billion-interstate-bridge-replacement-project/
[22] The Speed Sweet Spot https://www.nrdc.org/stories/speed-sweet-spot
[23] The "faux" green Interstate Bridge replacement
https://www.clarkcountytoday.com/news/the-faux-green-interstate-bridge-replacement-proposal/
[24] Annual VMT in the US https://afdc.energy.gov/data/10315#

save nearly $2 billion. It is far more flexible and would travel at roughly twice the speed of light rail.

- TriMet is demanding new taxes from both states[25], in order to pay for operations and maintenance of the light rail extension. Economist Joe Cortright reported “Neither C-TRAN nor TriMet is willing to commit any funds of their own to this project. This is especially important because the USDOT (Federal Transit Administration) won’t fund the capital construction of a project that has no source of operating funds.”
- TriMet’s JC Vannatta told legislators: “TriMet will not be responsible for O&M costs resulting from the extension into Vancouver.”
- TriMet is demanding the project pay for 19 light rail vehicles for a 1.9-mile extension of an existing line. That’s one new vehicle for every one-tenth of a mile.[26] Absurd. Furthermore, the price they seek is $190 million to $290 million, or $10 million to over $15 million per vehicle, between double and triple what they recently paid for replacement light rail vehicles.
- The 2022 INRIX reports Portland is 12th worst in the nation for congestion. Interstate traffic tries to move through the heart of Portland where the I-5 constricts to 2 lanes and poorly designed interchanges cannot handle existing traffic. People lost 72 hours at a cost of $1,216 per driver. The last mile speed was 15 mph.[27] Such problems are appropriately solved with bypasses that provide alternative routes around inner city bottlenecks. This project focuses on the wrong area north of the primary I-5 bottleneck and does not provide any alternative route.
- The 2023 INRIX study reports rush hour commuters spent the equivalent of a full workweek stuck in traffic last year, six hours longer than in 2022. Inrix ranks the Rose Quarter to the Interstate Bridge as the 15th-slowest rush hour traffic corridor in the entire country. Drivers lost 15 minutes a day there to traffic, the equivalent of 61 hours over a year.[28] The project and Oregon refuse to add vehicle capacity at the Rose Quarter to fix the region’s real #1 bottleneck.
- In 2024 Portland had the nation’s 7th worst traffic congestion[29]. Portland sees six hours and 36 minutes of average daily congestion on its roads compared with the national average of three hours and 41 minutes[30].
- The IBR has not done a current traffic projection study. CRC data from 2005 and 2008 studies indicated in 2030, there would be 184,000 daily movements on the corridor, requiring 5.6 lanes in each direction. It further showed 288,000 daily movements by

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[25] TriMet demands new taxes for O&M of light rail
https://www.clarkcountytoday.com/opinion/opinion-new-taxes-required-for-1-3-billion-light-rail-extension-to-vancouver/
[26] Clark County Today
https://www.clarkcountytoday.com/news/paying-too-much-for-too-many-max-light-rail-vehicles/
[27] INRIX 2022 – https://inrix.com/scorecard-city-2022/?city=Portland%20OR&index=37
[28] INRIX 2023 Oregonlive
https://www.oregonlive.com/business/2024/07/portland-traffic-got-a-lot-worse-last-year-study-finds.html
[29] Portland Traffic among the worst
https://www.koin.com/news/portland/portland-traffic-among-the-worst-in-the-u-s-report-shows/
[30] Axios https://www.axios.com/local/portland/2024/09/11/traffic-congestion-worst-study-i-5-bridge

2058, requiring 8.3 lanes in each direction.[31] Replacing a 3-lane bridge with another 3 lane bridge leaves the transportation corridor short by 3 lanes (each direction) on opening day.

- Because the two bridges (I-5 & I-205) over the Columbia River act as a transportation system, in 2058 the traffic was projected to be 549,000 daily vehicles, requiring 16.4 lanes in each direction. In 2035 at the completion of the IBR, there will be 7 lanes, leaving a shortage of 9 lanes (each direction).
- The Clark County Council supports immediate planning for 3rd and 4th bridges.[32] Their focus is on actually saving people travel time, reducing traffic congestion and improving freight mobility.
- The LPA ignores the requests of Hayden Island residents (ground zero for the project). The HiNoon organization wants a 3rd bridge built adding capacity over the Columbia River before any replacement or repurposing of the Interstate Bridge begins.[33]
- Hayden Island Community Advisory Group member Tom Gentry was involuntarily removed from the IBR Community Advisory Group after a year, for simply asking too many logical questions[34] and advocating for the concerns of island residents[35].
- The on/off ramps at the Vancouver waterfront were predicted to possibly have 6 percent grades. The bridge itself may have a 4 percent grade[36]. Rather than improving safety, this project adds potential new hazardous safety conditions, especially for freight haulers in rain, snow and ice that are common Portland winter weather conditions,[37] points out a retired engineer.
- The failed Columbia River Crossing (CRC) was labeled “A bridge too false” by a local media outlet[38] due to all the lies and half-truths told. The IBR continues that pattern of misleading the public.
- Transit ridership projections are grossly unrealistic. Presently there are less than 1,000 transit boardings across the two Columbia River (I-5 and I-205) bridges; 525 on I-5 and 295 on I-205. The IBR projects by 2045 there will be 26,000 to 33,000 daily boarding on

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[31] Kevin Peterson analysis
https://www.clarkcountytoday.com/news/transportation-architect-kevin-peterson-reveals-flaws-in-the-columbia-river-crossing-and-what-could-be-an-option-for-the-interstate-bridge/
[32] Clark County supports planning for 3rd & 4th bridges
https://www.clarkcountytoday.com/news/county-approves-planning-for-third-and-fourth-transportation-corridors/
[33] Interstate Bridge Replacement plan throws North Portlanders under the truck –
https://northpeninsulareview.com/wp-content/uploads/2023/08/Newspaper_8-1-23.pdf
[34] Gentry questions IBR
https://www.clarkcountytoday.com/news/interstate-bridge-replacement-effort-gets-36-million-funding-boost-as-community-group-grapples-with-options/
[35] Clark County Today
https://www.clarkcountytoday.com/news/interstate-bridge-replacement-effort-gets-36-million-funding-boost-as-community-group-grapples-with-options/
[36] Bob Ortblad - Dangerous Options
https://www.clarkcountytoday.com/opinion/letter-the-interstate-bridge-replacement-program-has-presented-three-dangerous-i-5-bridge-options/
[37] Bob Ortblad – New bridge design proves critics right
https://www.clarkcountytoday.com/opinion/opinion-ibr-floats-new-bridge-design-proving-critics-right/
[38] Willamette Week https://www.wweek.com/portland/article-17566-a-bridge-too-false.html

the I-5 corridor alone.[39] There is no evidence that transit ridership will increase 30 to 50 fold in the next two decades[40], let alone during the 100-year life of a replacement bridge.

- The IBR reports 63 percent[41] of people rank travel time as their most important priority for transit. Yet the MAX Yellow Line only travels an average of 14 mph, too slow to attract new ridership.
- TriMet broke multiple promises to citizens and federal agencies when the Yellow Line was created two decades ago. They promised 8 trains an hour in 2020[42], yet only have 4 an hour at peak times and two an hour at non-peak times today[43].
- Our Regional Transportation Council (MPO) recently reported a "new normal", which included a 150 percent increase in people working from home, a 68 percent reduction in transit ridership, and people's preference for driving their privately owned vehicles.[44]
- A 2018 PEMCO survey found 94 percent[45] of Portland metro area residents preferred to use their privately owned vehicles for transportation.
- Former Oregon Transportation Commissioner (OTC) Chair Robert Van Brocklin recently said only 4 percent of people in Portland use transit.[46] He and other OTC members sounded alarms and shared skepticism about how the state would pay for the projects[47].
- Only 525 daily boardings on the C-TRAN "express" bus routes using I-5, an increase of two people from the prior year. Local route ridership has returned to pre pandemic levels, but not ridership across the Columbia River, according to the CEO.
- Unrealistic forecasts including 26,000 to 33,000 transit riders on the I-5 corridor are a red flag. There are ample historical records that accurately document the fact that rather than skyrocketing, local transit ridership continues its long-term declining trend. Transit trips make up far less than 1 percent of bridge traffic. Common sense would not spend a grossly disproportionate percentage on transit at the expense of more than 99 percent of the bridge traffic.

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[39] Clark County Today
https://www.clarkcountytoday.com/news/transit-gets-much-attention-as-details-on-ibr-about-to-be-released/
[40] Another transit failure?
https://www.clarkcountytoday.com/news/is-the-ibr-setting-up-another-transit-failure/
[41] TriMet's broken promises
https://www.clarkcountytoday.com/news/trimets-broken-promises-on-getting-people-to-use-transit/
[42] Cascade Policy Institute - Broken Promises
https://cascadepolicy.org/transportation/the-max-yellow-line-a-look-back-after-15-years/
[43] TriMet Yellow Line schedule https://trimet.org/schedules/w/t1190_1.htm
[44] "New Normal" - Clark County Today
https://www.clarkcountytoday.com/news/rtc-says-new-normal-for-low-transit-ridership-and-high-private-vehicle-use/
[45] Will IBR force people out of cars?
https://www.clarkcountytoday.com/news/will-the-ibr-try-to-force-people-out-of-their-cars/

[46] A data driven solution for IBR 50 years into future
https://www.clarkcountytoday.com/news/a-data-driven-interstate-bridge-solution-50-years-into-the-future/

[47] Two OTC members resign early
https://bikeportland.org/2023/04/14/shakeup-at-oregon-transportation-commission-as-two-members-step-down-before-terms-expire-372946

- Five years ago, Clark County's C-TRAN offered seven "express" bus routes over the Columbia River. Today there are three. There is so little demand for cross-river transit that Portland's TriMet does not offer bus service to Clark County.
- In 2012, CTRAN conducted a survey on light rail, which was rejected in every city in Clark County. The entire county was allowed to vote. In 2013, a county-wide advisory vote on light rail was held. Over 68 percent of voters agreed that voters should be allowed to vote before any taxpayer funds are spent to bring light rail into Clark County.[48]
- Improving and fostering interstate commerce must be a top priority for any transportation project. Adding tolls to the I-5 bridge will divert traffic onto the I-205 bridge and foreseeably gridlock that alternative route. Tolls penalize drivers who would otherwise add interstate commerce to our local economy. The tolling impediment discourages interstate commerce and drives a wedge between the two sides of our currently united metropolis. Spending billions to harm the financial well being of this area would do far more harm than good.
- Tolling is unwanted by citizens. Three different levels of tolls are being discussed "if" federal authorities approve multiple plans under consideration by both the IBR, ODOT and Portland transportation officials. The IBR wants tolls to cross the bridge. ODOT additionally wanted "per mile" road usage charges, via a recently canceled Regional Mobility Pricing Program.[49] Oregon legislators say tolling is still alive[50]. They have estimated tolls could be in excess of $30 per day for a round trip from Vancouver to Wilsonville.[51]
- A Feb. 2024 public opinion poll revealed 76 percent of citizens overall in the 3 Portland metro counties (excluding Clark County in WA) reject tolling. The highest rejection was in Clackamas County with 91 percent of people opposed[52].
- ODOT revealed an initial 83-86 percent "cost of collection" for I-205 tolls, triggering greater outrage among citizens.[53]
- Federal law prohibits tolling on existing roads unless new lanes and vehicle capacity are being added. The Oregon I-205 tolling project would be the first location in the nation to have tolls on existing pavement, when no new lanes or vehicle capacity is being built. Citizens view the IBR as allowing the camel's nose into the tent for expanded tolling in the near future.

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[48] IBR adds new transit options
https://www.clarkcountytoday.com/news/ibr-adds-new-transit-options-for-consideration-to-new-bridge-over-columbia-river/
[49] Kotek cancels RMPP
https://www.clarkcountytoday.com/news/oregon-gov-kotek-kills-i-5-i-205-per-mile-tolling-but-proposed-i-5-bridge-tolls-remain/
[50] OPB - Tolling is still on the table -
https://www.opb.org/article/2024/03/12/plan-to-add-tolls-portland-oregon-highways-dead-for-now/
[51] Joe Cortright
https://www.clarkcountytoday.com/opinion/opinion-driving-between-vancouver-and-wilsonville-at-5-p-m-odot-plans-to-charge-you-15/
[52] DHM Public Opinion Survey https://westlinnoregon.gov/citycouncil/i-205-regional-tolling-survey-results
[53] 83-86% Cost of Collection
https://www.clarkcountytoday.com/news/odots-86-percent-cost-of-collecting-tolls-on-i-205-revealed/

- The IBR finance plan seeks at least $1.2 billion in tolling revenue and potentially $1.6 billion. Eliminating the $2 billion light rail component and building a $50 million (or less) BRT option would eliminate the need for tolling. By law, federal funds (FTA) can pay a maximum of 50 percent[54] of the light rail cost.
- Oregon Congresswoman Lori Chavez-DeRemer introduced the **No Tolls on Oregon Roads Act** that would prohibit the use of federal funds for tolling on I-5 and I-205 and prohibits the U.S. Department of Transportation (USDOT) from approving I-5 and I-205 tolling projects.[55]
- Congresswoman Chavez-DeRemer believes there was a flawed Draft I-205 Environmental Assessment (EA); ambiguity over multiple tolling proposals; failed ODOT public outreach and a host of other problems.[56]
- "Replacing the I-5 Interstate Bridge is a solution for nothing" according to the Cascade Policy Institute.[57]
- Other viable options, including a 3rd bridge or a tunnel[58] were improperly evaluated and discarded without proper screening and community input[59]. Local civil engineers have proven the IBR issued an intentionally flawed report and evaluation of an immersed tube tunnel option. The IBR was off by a factor of four regarding excavation and required depths.[60]
- Traffic diversions will be horrendous for local communities. A CRC evaluation showed 35,000 vehicles diverting to I-205 due to Interstate Bridge tolls[61]. ODOT evaluated the impacts of tolling in 2017-2018 and predicted 130,000 total vehicle diversions once tolls were placed on all Portland area freeways.[62]
- The "cost of collection" for tolls can be extremely high[63]. It's an inefficient system for raising transportation dollars. In the Seattle area on I-405, the cost of collection was 68

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[54] Federal Register https://www.federalregister.gov/documents/2022/04/28/2022-09143/notice-of-fta-transit-program-changes-authorized-funding-levels-and-implementation-of-the

[55] Congresswoman Chavez-DeRehmer Chavez-DeRemer Introduces Legislation to Kill Oregon Tolling Permanently | Representative Chavez-Deremer (house.gov)

[56] Congresswoman Chavez-DeRemer Lori_Chavez_DeRemer_Digital_Letterhead (house.gov)

[57] John Charles, Cascade Policy Institute https://cascadepolicy.org/transportation/replacing-the-i-5-interstate-bridge-is-not-a-solution-for-anything/

[58] Bob Ortblad https://www.clarkcountytoday.com/opinion/letter-retraction-required-due-to-conflict-of-interest/

[59] Bob Ortblad - Immersed Tube Tunnel option https://bikeportland.org/2022/02/23/the-overlooked-i-5-columbia-crossing-option-an-immersed-tube-tunnel-348880

[60] Clark County Today - Is a tunnel actually viable? Is a tunnel actually viable for crossing the Columbia River? | ClarkCountyToday.com

[61] Robert Liberty data https://www.clarkcountytoday.com/news/when-the-facts-dont-jive-with-the-data-on-the-interstate-bridge-replacement/

[62] You're actually going to make things worse – https://www.clarkcountytoday.com/news/tolling-youre-actually-going-to-make-things-worse/

[63] WSTC https://www.clarkcountytoday.com/news/state-tolling-revenues-down-158-million-due-to-pandemic-with-464-million-drop-over-decade/

percent[64].The gas tax has under a one percent cost of collection. Furthermore, the entire Washington state tolling system needed to be bailed out by General Fund revenues from the legislature for 3 years.

- The Draft Supplemental Environmental Impact Statement (DSEIS) is two years late in its release[65]. Multiple facets of the document are inaccurate and incomplete[66]. Continuing to fund a project that can't meet transparency and environmental requirements is a waste of federal and state dollars.
- The DSEIS reveals the program will save a miniscule 31 metric tons (MT) of CO2 per day, in spite of claims the project is "green". It will take over 41 years to recover construction CO2[67]. Furthermore, the project will increase daily Vehicle Miles Traveled (VMT) in direct opposition to goals of both states requiring a reduction in VMT.
- Doing nothing would save 11 minutes on C-Tran's "Express" bus service to Portland, when compared to building the LPA. Multiple facets of the proposed project contradict various environmental goals.
- The "seismic risk" to the current structure has been blown out of proportion. The real experts at the M9 Project (Univ. of Washington) predict only a 10-14 percent chance of a magnitude 9 earthquake happening in the next 50 years. That means there's an 86 - 90 percent chance a major earthquake that would destroy the bridge will not happen in the next 50 years.[68]

The IBR program is proposing to spend between $5 billion and $7.5 billion (current price) replacing the two steel Interstate Bridge structures across the Columbia River. One bridge is 34 years younger than the Brooklyn Bridge and the other is 75 years younger. In 1958 the original bridge received a significant structural upgrade. Nobody would think of destroying the Brooklyn Bridge. Why destroy the two Interstate Bridge structures? They are on the National Historic Register. The oldest steel bridge still in use in the U.S. was built in 1838.[69]

When you visited the Portland area July 7th, you spoke about saving time being the most important aspect of the Washougal rail crossing project the DOT is funding. From a local news report[70]:

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[64] Clark County Council https://www.clarkcountytoday.com/news/county-council-discussion-on-tolling-interstate-bridge-and-oregon-freeways-centers-on-the-need-for-the-plan-to-be-project-specific-and-time-limited/

[65] DSEIS is 2 years behind schedule https://www.clarkcountytoday.com/opinion/opinion-the-interstate-bridge-replacement-is-two-years-behind-schedule/

[66] What the IBR doesn't want you to know https://cityobservatory.org/what-ibr-doesnt-want-you-to-know/

[67] Faux "green" IBR revealed https://www.clarkcountytoday.com/news/the-faux-green-interstate-bridge-replacement-proposal/

[68] What is the seismic risk https://www.clarkcountytoday.com/news/what-is-the-seismic-risk-of-the-cascadia-subduction-zone-and-earthquakes-in-the-pacific-northwest/

[69] Dunlap's Creek Bridge, PA .https://www.aisc.org/nsba/timeline/

[70] Buttigieg asked where's the value https://www.clarkcountytoday.com/news/dot-secretary-pete-buttigieg-asked-wheres-the-value-in-the-i-5-bridge-replacement-project/

"Buttigieg spoke about people's most valuable commodity being time, and the Washougal project will help people in that community save time. "That's why this matters so much," he said. But he also spoke of building transportation projects that will "serve our children and our grandchildren".

This is extremely relevant to the IBR because the proposed Locally Preferred Alternative does not save people time. Period.

Presently, the morning commute time from north Vancouver to Portland's Fremont Bridge takes 29 minutes. The IBR predicts in 2045 it will take 60 minutes. The IBR proposes to replace an over congested 3-lane bridge with another 3-through lane bridge (and one auxiliary lane). If they did nothing (saving $7.5 billion), the "no build" travel time would be 63 minutes.

The IBR reports 28 percent of rush hour vehicles are going zero to 20 mph today. After building the LPA, they predict congestion to worsen to 50 percent of rush hour traffic traveling zero to 20 mph. In addition to failing to improve congestion, environmental pollution will worsen proportionally. Tens of thousands of vehicles stuck in stop and go traffic is horrible for the environment. It fails to save people time which you correctly identified as the most important thing to people.

Oregon State Senator Lew Frederick asked IBR Administrator Greg Johnson "how much time will people save?" Johnson's response - "not much".[71]

The I-5 Interstate Bridge is part of a critical trade route for regional, national and international commerce. The real "stop light" for the entire I-5 transportation corridor in the Portland metro area is not the Interstate Bridge but Portland's Rose Quarter, where I-84 merges with I-5. The interstate narrows down to just two lanes where the two interstates merge in the heart of the city. True insanity from a freeway transportation system standpoint. This is the only 2-lane section of I-5 in an urban area from Canada to Mexico.

In a 2003 Portland/Vancouver I-5 Transportation & Trade Partnership, ODOT Director Bruce Warner offered the following comparison of river crossings. Portland has two highway crossings and one rail crossing of the Columbia River.

Norfolk had 4 highway crossings & zero rail crossings. Cincinnati had 10 highway crossings and 2 rail crossings. Kansas City had 10 highway crossings and 3 rail crossings. Pittsburgh had over 30 highway crossings and 3 rail crossings. St. Louis had 8 highway crossings and 2 rail crossings.

By any measure, the Portland metro area was behind 21 years ago. We're further behind today with no plans for a 3rd or 4th bridge.

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[71] Clark County Today
https://www.clarkcountytoday.com/news/bi-state-legislative-committee-reviews-interstate-bridge-progress-and-issues/

Transportation architect Kevin Peterson has worked on transportation systems including transit, all over the world. He called the Rose Quarter "the elephant in the room" regarding traffic congestion for the I-5 corridor. Peterson evaluated the project's traffic projections (2005 and 2008) and offered the following conclusions.

"The I-5 transportation corridor will need at least 5 lanes in each direction in 2030, 2 to 4 years prior to the opening of the IBR's LPA proposal. The corridor will need at least 7 lanes in each direction by 2045, the date the IBR uses for travel time and traffic congestion comparisons. By 2065, the I-5 corridor would need at least 9 lanes in each direction."

Oregon's Cascade Policy Institute recently noted: "The Interstate Bridge Replacement Project, now in its 26th year of planning, will have no effect on traffic congestion because it doesn't add capacity. We will still have only two bridges over the Columbia River in the Portland region."[72] They also note congestion relief has been the people's top priority for 30 years. Yet it will get worse because the Metro regional government doesn't care what the people want.[73]

PEMCO reported (2018) that 94 percent of people want to use their privately owned vehicles for transportation. An April 2019 Oregon Transportation Commission survey found 51 percent of citizens want to "expand and improve interstates and interstate bridges." Another 14 percent want expanded arterials[74]. Two out of three people want added vehicle capacity as their top transportation priority.

Former Metro Councilor and senior counsel to Oregon's Congressman Earl Blumenauer Robert Liberty spoke out against the program. He noted in 2005, the Columbia River Crossing traffic analysis showed no difference between the "no build" and spending $3.6 billion on the CRC's LPA, in terms of number of vehicles traveling on the two transportation corridors across the Columbia River. Liberty believed it was not worth the money, then or now.[75]

"Replacing the I-5 Interstate Bridge is not a solution for anything," states the Cascade Policy Institute.[76] "*The entire I-5 corridor from Wilsonville to Vancouver is over-subscribed for about 12 hours per day, and this will only get worse as the region grows.*

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[72] Cascade Policy Institute Oregon's highway freeze is not about the weather
https://cascadepolicy.org/transportation/oregons-highway-freeze-is-not-about-the-weather/

[73] Cascade Policy Institute Metro gives up on reducing traffic congestion
https://cascadepolicy.org/transportation/metro-gives-up-on-reducing-traffic-congestion/

[74] Clark County Today - A data driven response
https://www.clarkcountytoday.com/opinion/opinion-a-data-driven-response-to-governors-inslee-and-brown/

[75] When the facts don't jive - Clark County Today
https://www.clarkcountytoday.com/news/when-the-facts-dont-jive-with-the-data-on-the-interstate-bridge-replacement/

[76] Cascade Policy Institute Replacing the I-5 bridge is not a solution for anything
https://cascadepolicy.org/transportation/replacing-the-i-5-interstate-bridge-is-not-a-solution-for-anything/

The Interstate Bridge should be left alone for now, and ODOT should be directed to start planning for two new bridges – one upstream from the Glenn Jackson I-205 Bridge, and one downstream from the I-5 Interstate Bridge. The new crossings would eliminate most congestion on the existing bridges, while providing essential redundancy in the event of a catastrophic earthquake.

The Cascade Policy Institute recommendation mirrors the 2008 Regional Transportation Council (RTC) "Visioning Study"[77], planning for when Clark County, WA reached 1 million in population. They identified the need for two new bridges and offered two options for each location. Over 100,000 people have moved into the county, now at about 525,000. No planning is under way for even a single new crossing. Another 190,000 are projected by 2045 according to the Clark County Transportation Alliance.[78]

A single bridge and transportation corridor will not solve traffic growth and congestion problems. A 3rd and 4th bridge (or tunnel) across the Columbia River are needed. That's what the data shows. It makes no sense to fund the replacement of a 3-lane bridge with another 3-lane bridge that will immediately be congested the day it opens.

The Cascade Policy Institute mentioned "No other type of infrastructure is artificially constrained this way. When public schools experience a growth in students, school districts build or buy more classroom space. Regional drinking water providers spend billions of dollars on new pipes and treatment facilities to accommodate growth. Only highways are subject to scarcity by design."[79]

A 2011 CRC Traffic Technical Report showed essentially no difference in the number of vehicles using the I-5 and I-205 corridors after completing the CRC's Locally Preferred Alternative, than would be under the "no build" option. The expenditure of $3.6 billion would deliver no improvement in vehicle capacity and throughput.

The CRC lied about the number of jobs created[80]. The IBR is painting similar rosy pictures of economic opportunities, without legitimate substantiation. The CRC was labeled "A bridge too false[81]". Most of the case for the $3.6 billion Columbia River Crossing wasn't true. The same can be said about the Interstate Bridge Replacement Program.

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[77] RTC Visioning Study
https://www.clarkcountytoday.com/news/regional-transportation-council-urged-to-revisit-2008-transportation-corridors-visioning-study/
[78] 2025 Clark County Transportation Alliance Policy Statement
[79] Cascade Policy Institute
https://www.clarkcountytoday.com/opinion/opinion-metro-gives-up-on-reducing-traffic-congestion/
[80] A lie times ten Not True, Times Ten (wweek.com)
[81] A Bridge too False A Bridge Too False (wweek.com)

The “seismic risk” is not a current threat. The 6.8 Nisqually Quake in 2001 did no damage to any Portland area bridges.[82] The second Interstate Bridge structure was completed in 1958, just 8 years prior to the completion of the I-5 Marquam Bridge just 7 miles south of the project in Portland. These structures are deemed “safe” by both ODOT and WSDOT.

Randall O’Toole has been examining transit for decades and is known as the “Anti Planner.” He talks about “strategic misrepresentation” as a form of lying on light rail and these mega projects. He notes they over-project transit ridership and under-estimate costs in a 2022 column, Lie Rail Supporters Keep On Lying.[83]

Almost every light-rail project ever built has cost far more than the original projections. Cost overruns are so systematic that Oxford researcher Bent Flyvbjerg says they are “best explained by strategic misrepresentation, that is, lying.”[84] Other lies included overestimated ridership numbers and the claim that light rail is “high-capacity transit.”

“In the world of civic projects, the first budget is really just a down payment. If people knew the real cost from the start, nothing would ever be approved. The idea is to get going. Start digging a hole and make it so big there’s no alternative to coming up with the money to fill it in.” San Francisco Mayor Willie Brown[85].

A 2022 article by Charles Marohn in the publication Strong Towns, shows how the game is played. He calls it “engineering malpractice.” He also labels seeking public input: “engagement theater.”[86] The IBR has been full of engagement theater, creating the appearance of reaching out to citizens, but ignoring their input.

The Portland MAX light rail is currently limited by almost all trains needing to cross the 1912 Steel Bridge over the Willamette River. During rush hour, there is a light rail train crossing the bridge every 90 seconds. There is no ability for TriMet to add additional light rail trains to expand light rail service for the IBR or any other route. Furthermore, the Yellow Line only travels at 14 mph - far too slow to be a viable alternative for interstate commuters.
.
Additionally, “when” the major earthquake hits, the Steel Bridge in Portland will be damaged or destroyed, eliminating light rail service as a transportation option. One possible “solution” would be to underground the MAX light rail via a tunnel under the Willamette River or to build a separate, new seismically sound bridge. TriMet is currently evaluating a tunnel option, but has no plans or ability to fund the tunnel.

TriMet’s MAX light rail is limited to just 2 light rail cars in a train, due to the short length of a downtown Portland block. Adding a 3rd or 4th light rail car would block downtown Portland

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[82] Nisqually Quake https://en.wikipedia.org/wiki/2001_Nisqually_earthquake
[83] Randall O’Toole http://ti.org/antiplanner/?p=19978
[84] Brent Flyvbjerg http://americandreamcoalition.org/transit/Flyvbjerg02.pdf
[85] Desperate Rail Gambit https://www.city-journal.org/article/desperate-rail-gambit
[86] Engagement Theater
https://www.strongtowns.org/journal/2022/4/4/ignoring-induced-demand-is-engineering-malpractice

intersections, bringing traffic movement to a standstill. Until the light rail is either underground (a subway) or elevated, this restriction will remain the achilles heel of MAX to truly grow their light rail system.[87]

Voters in both states have rejected light rail. In 2019, Oregon voters rejected a new TriMet Southwest Corridor light rail line.[88] Clark County voters repeatedly reject light rail.[89] In 1995, Clark County voters rejected light rail.[90] In 2013, 223 out of 228 Clark County precincts rejected the CRC and its light rail and tolls[91].

The CRC and now the IBR is “a light rail project in search of a bridge”. These were the words of an Oregon Supreme Court Justice. Gov. Jay Inslee told citizens “no light rail, no bridge” in 2014. Representative Earl Blumenauer in 2019 demanded light rail or nothing. “It's a deal breaker unless it's there”[92]

An I-5 Transportation Trade Partnership report[93] two decades ago said: "Oregon interests required emphasis on a multi-modal solution * * * because of the difficulty of accommodating [traffic] demand through a highway-only expansion of I-5," Clark County interests "needed a highway element because the land use patterns of Clark County require[] a system with greater dependence on auto access." They said a 10-lane bridge performed the best.

In 2010, “Metro staff developed a forecast of the growth that would be induced by a full build out of the CRC project, with a 10-to-12-lane bridge, light rail line and $2 rush-hour tolls each direction.”[94]

C-TRAN’s operating costs for its BRT system are 34 percent cheaper than the operating costs (per boarding rider) for the MAX light rail. TriMet’s MAX costs are $8.24 versus C-TRAN’s $5.44 BRT cost per boarding passenger.[95]

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[87] Metro MAX Tunnel Study MAX Tunnel Study Findings.pdf (oregonmetro.gov)
[88] Oregon Public Broadcasting
https://www.opb.org/article/2020/11/04/metro-tax-light-rail-portland-pass-fail-result/
[89] Congresswoman Jaime Herrera Beutler
https://www.clarkcountytoday.com/news/opposition-to-ibr-light-rail-and-tolling-follows-two-meetings-of-bridge-leadership/
[90] CRC is Rail Project http://www.debunkingportland.com/crc-is_rail_project.html
[91] Resurrecting the Columbia River Crossing
https://www.thereflector.com/stories/resurrecting-the-columbia-river-crossing,47643
[92] Blumenauer demands light rail
https://www.wweek.com/news/state/2021/04/10/u-s-rep-earl-blumenauer-says-its-light-rail-or-bust-for-next-columbia-river-bridge/
[93] I-5 Transportation Trades Partnership
https://data.wsdot.wa.gov/accountability/ssb5806/Repository/2_Long%20Range%20Planning/I-5%20Partnership/Summary%20Documents/Summary.pdf
[94] Metro finding on Columbia River Crossing
https://www.oregonmetro.gov/news/metro-finds-columbia-river-crossing-toll-bridge-with-light-rail-would-have-negligible-impact-on-growth
[95] When the facts don’t jive with the data
https://www.clarkcountytoday.com/news/when-the-facts-dont-jive-with-the-data-on-the-interstate-bridge-replacement/

The current proposal which mirrors the failed Columbia River Crossing, is loaded with unnecessary pork barrel spending for the $2 billion light rail component. They demand 19 new light rail vehicles for a 1.9-mile extension of an existing line.[96] TriMet's recent "Better Red" 10-mile light rail extension only added four new light rail vehicles. An unneeded expansion of TriMet's Gresham maintenance facility is also included, which is roughly 10 miles outside the project area. TriMet is replacing 19 worn out light rail cars in this project that will serve their entire light rail system, not the project's proposed 1.9 mile extension of a current line.

This appears to be fraudulent misrepresentation at best. Washington taxpayers should not be footing any of the bill for replacement of 13 percent of TriMet's 145 vehicle light rail fleet, nor paying for any of their maintenance facilities in Gresham. The federal government should not be paying this as part of the IBR funding. The state of Oregon can bail out TriMet with other local funds if they want to do so.

The US Census Bureau reports that people using mass transit to commute to work remains 38 percent below pre pandemic levels. Put another way, 97 of 100 Americans do not use mass transit for daily trips. Both Portland's TriMet and Clark County's C-TRAN report transit ridership is only about half the peak more than a decade ago.[97]

In a 2023 survey conducted by TriMet, 60 percent of people who use the transit system at least several times a week would not recommend the metro area's transit system to a friend or family member. The same survey also found and a majority of TriMet riders in the survey cited other riders' behavior as a reason they feel unsafe while riding.[98]

O'Toole supports a polycentric transportation system. "While TriMet carried 42 percent of downtown workers to and from their jobs in 2018, downtown held less than 10 percent of all jobs in the urban area. Outside of downtown, TriMet carried just 3.4 percent of workers to and from their jobs. Though Portland has been celebrated as "the city that loves transit," the reality is that TriMet provides terrible service to 90 percent of the region's workers and job centers."[99]

He notes Hillsboro had 83,000 jobs, Beaverton had 64,000 and Gresham more than 37,000. Downtown Portland currently has the highest office vacancy rate in the nation.[100] O'Toole recommends a nine-hub system with up to five buses per hour. It would cost no more than TriMet is spending on bus operations. Furthermore, "average bus speeds would nearly double, and speeds between hubs would be nearly triple light-rail speeds, thus attracting far more riders than TriMet is carrying today."

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[96] TriMet Gresham MX facility part of IBR https://www.clarkcountytoday.com/news/trimet-gresham-maintenance-facility-expansion-part-of-ibr/
[97] Transit Ridership Down Nationally and Locally https://www.clarkcountytoday.com/news/national-and-local-transit-ridership-down-significantly-feds-report/
[98] TriMet Unsafe https://www.kptv.com/2024/05/20/be-seen-be-heard-portland-is-trimet-safe/
[99] Randall O'Toole https://cascadepolicy.org/reports/press-release-trimet-in-the-twenty-first-century/
[100] Downtown Portland has highest office vacancy rate Downtown Portland's office vacancy rate is highest in the nation, report says - oregonlive.com

In 2019, both Governors Inslee and Brown promised to be “data driven” when signing their memorandum restarting the project.[101] A month later, Oregon and Washington legislators were provided with a host of data laying out the issues, and showing what needs to be done to reduce traffic congestion and save people time.[102]

Voters also don’t want tolling as a means of funding either the IBR or on Oregon freeways. Currently, Oregon citizens are collecting signatures for IP-4 (now IP-31), which will require a Vote Before Tolls can be placed on any Oregon road.[103] This was expected to be on the November 2024 ballot until Oregon Governor Tina Kotek issued an Executive Order prohibiting ODOT from collecting tolls until at least January 2026.[104] In March, the Governor canceled the RMPP tolling and paused everything else except IBR tolling discussions[105].

The IBR incorrectly discounted the option of an immersed tube tunnel as a possible alternative. Engineer Bob Ortblad revealed the IBR over-estimated the amount of dredging required by a factor of four. The IBR said they would need to remove almost 8 million cubic feet of materials and dredge to a depth of 80 feet. Ortblad’s calculations indicate at most 2 million cubic feet of dredging material and a depth of only 45 feet.

Portland economist Joe Cortright notes the IBR is using the least accurate traffic forecast, of three they have on record. “IBR relies on Metro’s Kate Model, which has an error factor of 14.5 percent and which over-estimates I-5 traffic by almost 20 percent.

IBR’s DSEIS makes no mention of the Stantec Level 2 forecast (with an error factor of 2.5 percent), or the CDM Smith Investment Grade Forecast (with an error factor of 0.8 to 2.5 percent)[106].”

Improper consideration of various alternatives should disqualify the project from federal funding consideration. Allowing grossly inflated transit ridership numbers (30 to 50 fold) should disqualify the project from consideration, and speaks to the lack of professionalism of project leaders.

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[101] Governor’s sign Memorandum of Intent
https://www.clarkcountytoday.com/news/governors-of-oregon-and-washington-sign-agreement-over-interstate-5-bridge-replacement/
[102] A Data Driven Solution to OR & WA legislators
https://apps.oregonlegislature.gov/liz/2019I1/Downloads/CommitteeMeetingDocument/208569
[103] Vote Before Tolls https://votebeforetolls.org/
[104] Willamette Week Gov. Pauses Tolling Kotek Makes It Official: She’s Ordered ODOT to Pause Tolling Until 2026 (wweek.com)
[105] Koteck cancels per mile tolls
https://www.clarkcountytoday.com/news/oregon-gov-kotek-kills-i-5-i-205-per-mile-tolling-but-proposed-i-5-bridge-tolls-remain/

[106] IBR’s DSEIS uses least accurate forecast
https://cityobservatory.org/ibrs-dseis-uses-the-least-accurate-forecast/

In 2014, the region was offered a “fixed price” bridge over the Columbia River east of the I-205 bridge for $860 million.[107] This demonstrated that a cost effective bridge could be built, saving taxpayer dollars and adding vehicle capacity over the river. Transportation architect Kevin Peterson estimated a 3rd bridge would reduce I-205 congestion by 15-20 percent.

The current bridge structures could be repurposed as a “local” connection, for slower moving vehicles and serve as a “collector distributor” envisioned in FHWA requirements. It would allow for a nearly level structure (compared to the much higher IBR LPA) for pedestrians, bicyclists, and transit. This would save roughly $200 million or more for the demolition and dismantling of the historic bridge structures.

Either an “express” bridge over the river or an ITT would add vehicle capacity to the I-5 corridor. That added capacity would reduce traffic congestion. A third bridge west of I-5 would add capacity, remove many freight haulers from the current bridge, and provide flexibility and redundancy. Portland has a dozen bridges over the Willamette River. We need more than two bridges over the Columbia River in the Portland-Vancouver metro area.

The IBR’s Greg Johnson says “you cannot build your way out of traffic congestion.” You certainly won’t if you’re refusing to try. ODOT proved him wrong by eliminating four hours of congestion on I-5 south of Portland simply by adding an auxiliary lane from OR 217 to I-205.

ODOT was proposing to add one lane to I-205 for a 7-mile stretch of the freeway. They project it will reduce traffic congestion from 14 hours a day to just 2 hours a day, as part of their Abernethy Bridge I-205 project[108]. Sadly, ODOT’s inability to manage transportation project costs has caused them to either pause or cancel multiple Portland area transportation projects, including the 7 miles of new freeway lanes on I-205.[109]

WSDOT just proved Johnson wrong as well. The addition of one new lane eastbound on SR-14 and two lanes westbound, has eliminated traffic congestion on a 2-mile section of this state highway in Vancouver.[110]

For roughly 50 years, over 20 reasonable ideas have been proposed for new crossings of the Columbia River according to local citizen Chuck Green. *“The I-205 Bridge was opened almost 40 years ago. Since that time: Clark County’s population has grown 261 percent.*

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[107] East County Bridge https://eastcountybridge.com/proposal/
[108] ODOT I-205 tolling effort moves forward https://www.clarkcountytoday.com/news/odot-i-205-tolling-effort-moves-forward-projecting-a-12-hour-reduction-in-traffic-congestion-by-2045/
[109] ODOT Indefinitely Pauses I-205 Projects OR tolling: I-205 Improvements Project indefinitely paused (koin.com)
[110] SR-14 lane addition eliminates traffic congestion https://www.clarkcountytoday.com/news/sr-14-lane-addition-eliminates-traffic-congestion/

Cross-Columbia River vehicle traffic has grown 239 percent. Cross-River Transportation Capacity has grown 0 percent.[111]

In summary, the IBR is far too expensive with an unknown cost increase to be revealed in a year. It fails to fix the one problem people want solved – saving time and reducing traffic congestion. After spending more than $7.5 billion, people will waste at least an additional 30 minutes being stuck in traffic congestion each morning. That would add 125 hours a year of lost time for hard-working citizens.

The proposal is “a bridge too low”, failing to meet the current let alone future needs of our maritime industry. The Coast Guard demands a bridge at least 62 feet higher. The IBR wastes one quarter of the money on a light rail extension that cannot carry enough people and travels too slow. Voters have rejected it multiple times. Why spend $7.5 billion on the IBR when $1 billion (perhaps $2 billion with current inflation) would do. (The Hood River bridge replacement over the Columbia River was $520 million).

Project leaders are misleading the community regarding multiple aspects of the project and disregarding legitimate transportation needs. It’s been over 40 years since new vehicle capacity and transportation corridors were added to the region. Let’s not waste valuable federal dollars on a project that does nothing to help the average citizen.

What is needed are new bridges and transportation corridors as part of a polycentric transportation system. Portland has a dozen bridges over the Willamette River. We need more than two bridges over the Columbia River. This is the only way to reduce traffic congestion and improve freight mobility.

Every major city in the world has numerous “ring roads” for traffic to bypass the crowded inner core. That practical logic must be applied to the Portland metro area. Serve the people and deliver legitimate value for taxpayer dollars by demanding the two new bridges over the Columbia River identified multiple times over the past 30-50 years. Most recently, the Regional Transportation Council “Visioning Study” (2008) identified the need for two additional bridges over the Columbia River, connecting Portland and Vancouver[112].

“Interstate freeways, classified as divided principal arterials, are designed to provide for the highest degree of mobility of large volumes of long-distance traffic,” according to a Regional Transportation Plan. “Collector facilities generally provide equal emphasis upon mobility and land use accessibility.”

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[111] Clark County Today - Chuck Green ideas ignored for crossings
https://www.clarkcountytoday.com/news/how-many-ideas-have-been-proposed-over-the-years-for-multiple-crossings-of-the-columbia-river/

[112] Interstate Bridge reached peak capacity in early 1990’s
https://www.clarkcountytoday.com/news/interstate-bridge-reached-peak-capacity-in-early%e2%80%901990s-and-the-glenn-jackson-bridge-did-so-in-the-mid%e2%80%902000s/

Peak lane usage on the I-5 Interstate Bridge is between 4,000 and 5,500 vehicles per hour on an over congested freeway. The I-205 Glenn Jackson Bridge can handle between 6,000 and 7,200 vehicles per hour because it has four lanes each direction instead of three lanes.

An average lane handles about 2,000 vehicles per hour at freeway speeds. Due to congestion, the Interstate Bridge carries at least 1,000 fewer vehicles due to traffic. The Glenn Jackson bridge handles 800 to 2,000 fewer vehicles at peak travel times.

Mr. Secretary as you said, saving time is people's most valuable commodity. Let's fund a project which actually delivers exactly that, not the current proposed Interstate Bridge Replacement project. The Locally Preferred Alternative is actually not "preferred" by average citizens, but special interests with political ties.

Please stop funding any aspect of the current IBR. There is no value for hard-working citizens on both sides of the Columbia River.

Sincerely,

John Ley
Concerned citizen
8500 NE Hazel Dell #H4
Vancouver, WA 98665

CC: Oregon Gov. Tina Kotek
Washington Gov. Jay Inslee
Greg Johnson – IBR Administrator

IBR Draft SEIS - RECORD #3003 DETAIL

First Name :	David
Last Name :	Fischer
Attachments :	DSEIS-3003_Fischer_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #3003 DETAIL

Submission Date :	11/18/2024
First Name :	David
Last Name :	Fischer
Business/Organization/Agency :	

Submission Input :

This really needs to be a tunnel. The impacts to both Hayden Island and the giant structure looming over the new Vancouver Waterfront make a tunnel the best choice. Retrofit the old bridge for local traffic, or build a simpler new bridge to replace it for local traffic.

IBR Draft SEIS - RECORD #3004 DETAIL

First Name :	Bob and Jan
Last Name :	Verrinder
Attachments :	DSEIS-3004_Verrinder_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #3004 DETAIL

Submission Date : 11/18/2024
First Name : Bob
Last Name : and Jan Verrinder
Business/Organization/Agency :

Submission Input :

First Name:
Bob and Jan

Last Name:
Verrinder

Business or Organization:
Vancouver Bicycle Club

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
People walking and wheeling on the bridge should have the same access points to MAX that other users have.

I bike mostly and frequently use MAX on the same trip.

JCA comment #: 753

IBR Draft SEIS - RECORD #3005 DETAIL

First Name :	Autumn
Last Name :	Mohr
Attachments :	DSEIS-3005_Mohr_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #3005 DETAIL

Submission Date :	11/18/2024
First Name :	Autumn
Last Name :	Mohr
Business/Organization/Agency :	

Submission Input :

I support a rebuild and seismic upgrades to the I-5 bridge but would like to see alternative transport lines d fully integrated in the project in a way that is equitable and sustainable. Please integrate bus, light rail, biking and pedestrian infrastructure. Please don’t over expand car lanes. We need fright options but not a Tacoma style freeway expansion made only for cars. Please think of the future of expanding rail lines to decrease carbon emissions. And please please consider the health and environmental impacts on marginalized and BIPOC communities. It’s important for the future of both our states to have equitable access to reliable transportation. The bridge needs to be overhauled, but not for cars. Do it for people. Center people, of all backgrounds and needs.

IBR Draft SEIS - RECORD #3006 DETAIL

First Name :	Jay
Last Name :	Cosnett
Attachments :	DSEIS-3006_Cosnett_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #3006 DETAIL

Submission Date : 11/18/2024
First Name : Jay
Last Name : Cosnett
Business/Organization/Agency :

Submission Input :

First Name:
Jay

Last Name:
Cosnett

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Climate Change

Comment:
Adding freeway lanes is incompatible with carbon emission reductions committed to by both Oregon and Washington. We need a cost-effective direct replacement of the existing bridge which adds seismic resilience, light rail, and pedestrian and bike infrastructure. Additional lanes will incur enormous costs and take us in the wrong direction on emissions.

JCA comment #: 752

IBR Draft SEIS - RECORD #3007 DETAIL

First Name :	Jessica
Last Name :	Fletcher
Attachments :	DSEIS-3007_Fletcher_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #3007 DETAIL

Submission Date : 11/18/2024
First Name : Jessica
Last Name : Fletcher
Business/Organization/Agency :

Submission Input :

First Name:
Jessica

Last Name:
Fletcher

Business or Organization:
Parent and Small Business Owner

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Neighborhoods and Equity

Comment:
To Whom it May Concern,

Thank you for this comment period. I have so many concerns about the current plans for the Interstate Bridge Crossing but just have a few minutes before the deadline. I have lived in Portland since 1995 and have loved the improvements to bike lanes and Active Transportation infrastructure. I live in St. Johns and unfortunately our community already faces intense cut through traffic from commuters traveling to and from Vancouver. I want to ride my bike or take transit everywhere I go and I want this for our kids! Please do not create a sprawling massive bridge that doesn't meet our needs for clean air and livability! Please think long term with transit as a priority.
Thank you.

JCA comment #: 751

IBR Draft SEIS - RECORD #3008 DETAIL

First Name :	Gabriel
Last Name :	Montez
Attachments :	Vancouver PAC_Original.pdf (94 kb)

CITY OF Vancouver WASHINGTON

MEMORANDUM

TO: **Interstate Bridge Replacement (IBR) Program Team**

FROM: **Ryan Morin, Chair**
Parking Advisory Committee (PAC)

DATE: **November 14, 2024**

SUBJECT: **Parking Advisory Committee comments on park and ride and IBR Draft Supplemental Environmental Impact Statement (SEIS) Report**

The City of Vancouver ("COV") Parking Advisory Committee ("PAC") was formed in 1999 to advise City Council on parking policy and implementation within downtown parking enforcement area. Additional PAC advisory duties include property acquisition or construction for parking facilities, parking analysis and studies, recommendations to adopt and amend ordinances related to on- and off-street parking.

Under the direction of the PAC, the COV Parking Services Division partnered with Walker Consultants to draft a new Access, Mobility, and Parking Plan ("Plan") for downtown Vancouver. The PAC is tasked with reviewing existing conditions, helping to develop action items, and provide guidance to the City's implementation of the Plan. Over the last 10 months, the PAC has reviewed extensive data, including downtown trip behaviors and occupancy and utilization data for on- and off-street parking spaces. The downtown core is expected to continue its dramatic growth, and this plan seeks to balance parking efficiency, access, curb management, and mobility alternatives to accommodate expected future growth.

During the PAC meeting in August 2024, IBR representatives provided an overview of the proposed IBR investments, and at the October 2024 meeting, COV staff, in collaboration with the IBR team, briefed the PAC on the key findings in the Draft SEIS related to the park and ride options under consideration. This memo summarizes the feedback provided by committee members during those meetings.

- New park and ride structures are in opposition to COV goals and policy to reduce the reliance on single occupancy vehicles downtown. A dispersed parking plan would better align with City goals. Investing in new parking facilities downtown will only induce more vehicle trips.
- COV Parking Services, along with partners, recently completed an existing conditions report. The report concluded that downtown Vancouver has roughly 14,000 parking spaces, the majority of which are chronically underutilized.
- The Library Square site (Evergreen #1) would be better utilized for other purposes. Building a parking structure would be a lost opportunity compared to a new transit-oriented development (TOD) focused on housing and commercial/retail amenities. The adjacent uses

are active and lively, park n ride facilities contribute to congestion that will negatively impact pedestrians.

- If new park and ride structures are required by federal partners, site W2 would be least harmful to long-term downtown development goals. Proposed site W2 is close to the Waterfront and may help to address parking demand in addition to serving transit users.
- In the opinion of PAC members, urban and dense areas are not ideal for park and ride locations. Leveraging existing suburban park and ride lots, with express buses bringing commuters to downtown, would be more ideal.

The Parking Advisory Committee strongly supports the City of Vancouver adopted goals, cited above, and therefore encourages the IBR project to utilize existing parking resources rather than building new park and ride facilities.

IBR Draft SEIS - RECORD #3009 DETAIL

First Name :	Jay
Last Name :	Cosnett
Attachments :	D1-3009_Cosnett_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #3009 DETAIL

Submission Date : 11/18/2024
First Name : Jay
Last Name : Cosnett
Business/Organization/Agency :

Submission Input :

First Name:
Jay

Last Name:
Cosnett

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Induced Demand

Comment:
Adding freeway lanes generates additional traffic, which creates more carbon emissions. Today's taxpayers, and future generations, need an IBR that will cost effectively make the crossing seismically resilient, and add light rail, bike, and pedestrian improvements. The current proposal is a massive expansion which will shatter our attempts to reduce our carbon footprint and reduce automobile dependency. This project will increase traffic and vehicle miles traveled, with severe adverse impacts on vulnerable communities.

JCA comment #: 750

IBR Draft SEIS - RECORD #3010 DETAIL

First Name :	George
Last Name :	Feldman
Attachments :	DSEIS-3010_Feldman_Original.pdf (5 kb)

IBR Draft SEIS - RECORD #3010 DETAIL

Submission Date :	11/18/2024
First Name :	George
Last Name :	Feldman
Business/Organization/Agency :	
Attachments :	D1-3010_Feldman_Original.pdf (12 kb)

Submission Input :

First Name:
George

Last Name:
Feldman

Business or Organization:
none

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:

This expansion of highways is unconscionable. We need public transportation, i.e. train or bus service. Congestion pricing should then be enforced to reduce vehicular traffic.

JCA comment #: 749

IBR Draft SEIS - RECORD #3011 DETAIL

First Name :	Harold Lee
Last Name :	Hanson
Attachments :	DSEIS-3011_Hanson_Original.pdf (2 kb) grasshopper_+13602549101_11_18_2024_195281428.mp3 (469 kb)

IBR Draft SEIS - RECORD #3011 DETAIL

Submission Date : 11/18/2024

First Name : Harold Lee

Last Name : Hanson

Business/Organization/Agency :

Submission Input :

Yeah, Harold Lee Hanson, I'm a longtime resident of East Portland and 44 years here in Clark County. And I'm totally against this boondoggle bridge **** and all the multi-billion dollars that Oregon transportation and Oregon government is trying to steal from Clark County who will pay the brunt of all the tolls. And their whole design of the bridge is just a total piece of ****.There's room west of the bridge to replace the old swing railroad bridge, which is actually a national security issue, and the railroad right away would give us an option to put in a new westbound corridor serving the Port of Vancouver, Port of Portland, and along the Willamette River, and possibly cross over to cut into Highway 30.That would relieve a lot of westbound traffic off of I-5 and get the truck traffic off of plane and then they have to go back on a fourth plane to head south to go deliver or whatever but reroute the traffic off of the bridge and we there's room for another bridge east 192nd to Troutdale usually and that take a lot of traffic both north and south off of I-205 and you could do both of those bridges for the kind of money TriMet wants to spend on this boondoggle bridge of theirs for this stupid train that nobody wants so let's get some brains in here bring the Corps engineers in and do some real designing, not these grifters who are out to steal every dollar they can and make a one or two or three billion dollar investment in our highway department into a nine billion dollar to pay off all the leeches. So anyway, I really doubt this will go anywhere because nobody has the balls in Clark County to stand up to Oregon. And like I said, Clark County is already paying half, at least a quarter of Multnomah County's intake on their illegal.

IBR Draft SEIS - RECORD #3012 DETAIL

First Name :	Mike
Last Name :	Faden
Attachments :	D1-3012_Faden_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #3012 DETAIL

Submission Date : 11/18/2024
First Name : Mike
Last Name : Faden
Business/Organization/Agency :

Submission Input :

First Name:
Mike

Last Name:
Faden

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
The proposed replacement for the I5 bridge could offer great advantages for transit, cycling and walking. However the current design presents problems that mean it is unlikely to deliver those advantages in practice. The design should be adjusted so that the multi-use path is on the same side as transit, so people can easily transfer from one to the other. This will facilitate greater use of those options and a corresponding reduction in car traffic. The transit lane should also be positioned between the multi-use path and the car traffic lanes, to reduce the impact on walkers and cyclists. To experience the impact of having a multi-use path right next to freeway traffic, try the path on the I-205 bridge, where the noise and other traffic effects are extremely unpleasant.

JCA comment #: 748

IBR Draft SEIS - RECORD #3013 DETAIL

First Name :	DEBORAH
Last Name :	LARNER
Attachments :	DSEIS-3013_Larner_Original.pdf (2 kb)

IBR Draft SEIS - RECORD #3013 DETAIL

Submission Date : 11/18/2024
First Name : DEBORAH
Last Name : LARNER
Business/Organization/Agency :

Submission Input :

NO LIGHT RAIL. NO TOLLING.

I vehemently oppose both light rail expansion into Clark County and any tolling.

It is my understanding that the IRB group insists that Clark County, WA, must accept Oregon's incredibly expensive MAX light rail on any I-5 replacement bridge but that light rail is not required on any replacement bridge.

The IRB group; who do you people think you are anyway? Nothing gives you the right to impose your will on the people of Clark County, WA, to do anything. Clark County, WA, voters voted "NO" repeatedly when asked if they want Oregon's light rail to come to Clark County.

There will never be enough people in the Portland/Vancouver area to support a light rail system, no matter how much the IRB group wishes there were.

The Portland/Vancouver area is obviously very spread out, and light rail operates on a fixed track with no flexibility. People have all kinds of places to go and stops to make. It is more convenient for people to drive their own cars, and that's what the vast majority of people prefer doing.

Rapid Transit Buses, smaller buses, and vans will meet publicly subsidized, pretty much non-existent, transit demand for many years and cost vastly less than unnecessary fixed track light rail. Bus sizes and routes are flexible, they can run on roads, no need for tracks, and they can share the road with other vehicles making the most of limited taxpayer dollars.

A light rail system would also hurt a bus system rendering both unprofitable.

Regarding tolling, too much of the money collected in tolls has to go to pay for the tolling system itself to make it beneficial. It seems to me that tolling is just being proposed to discourage people from driving, even if they have to drive to get to their jobs. Perhaps the IRB group doesn't care about people having to get to their jobs to earn a living?

NO LIGHT RAIL. NO TOLLING.

Deborah Larner
Vancouver, WA

IBR Draft SEIS - RECORD #3014 DETAIL

First Name :	Tobias
Last Name :	Hodges
Attachments :	DSEIS-3014_Hodges_Original.pdf (4 kb)

IBR Draft SEIS - RECORD #3014 DETAIL

Submission Date : 11/18/2024
First Name : Tobias
Last Name : Hodges
Business/Organization/Agency :

Submission Input :

First Name:
Tobias

Last Name:
Hodges

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
The Interstate Bridge Replacement project simply must allow for public transit, pedestrian, and bicycle traffic as its primary method of connecting Portland to SW Washington. Commuting by vehicle has already proven to be a non-scalable option for high population areas. The only viable alternative for the bridge is to make it multi-modal and allow actually effective transportation via light rail and bike/walk infrastructure.

JCA comment #: 747

IBR Draft SEIS - RECORD #3015 DETAIL

First Name :	Carol
Last Name :	Colleen
Attachments :	DSEIS_Colleen_Original.pdf (17 kb)

CAROL COLLEEN: I looked at all of the videos that you had posted showing the different options of the bridge and it's a bit overwhelming looking at all the options, and I don't really understand the impacts of, like, the C Street on-ramp and off-ramp.

But two thoughts that came to mind is that I appreciate that you've got kind of a low-profile structure that looks like it will not interfere with the traffic going in and out of Pearson Field. But my main comment is that I really feel that this should not have a lift span option.

I think that, you know, we have so many traffic backups now with the lift span, and designing a bridge that avoids that I think would be ideal for traffic going north and south on that bridge. And that's all I had to say. Thank you for putting this meeting together.

IBR Draft SEIS - RECORD #3016 DETAIL

First Name :	N/A
Last Name :	N/A
Attachments :	D1-3016_NoName_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #3016 DETAIL

Submission Date : 11/18/2024
First Name : N/A
Last Name : N/A
Business/Organization/Agency :

Submission Input :

I am glad to hear that there is a bike path and that it won't be placed in the middle of the freeway, however, I think you need to hear from some people who use public transit and bike when it comes to designing this thing. There are some logistical issues:

1) Many people use a combination of bicycling and bus/rail to get to work and school. There should be easy access between the bike path and the rail line.

2) The spiral ramp down seems to create a difficulty to being able to access the rail line, and also would be quite a hill to go up.

I also drive to work that way, connecting I5 north to 14 east. I'm sure that the 14 exit will be fixed in this process, as it is a pretty sudden and sharp exit.
Same goes for coming back from 15 back to I-5. The on ramp is a little scary as people are often driving pretty fast in the right lane and aren't good at allowing people to merge onto the freeway.

IBR Draft SEIS - RECORD #3017 DETAIL

First Name :	Bradley
Last Name :	Sones
Attachments :	DSEIS_Sones_Original.pdf (18 kb)

BRADLEY SONES: I live in Camas, Washington. I did get a chance to review the draft SEIS report, really well put together. My main concern going into that report was seeing if there was going to be a toll plaza or making people stop for tolls. But after reading that, I could see that it would be automated or license plate reader for tolls, which sounds like a much better option. Ideally, of course, there would be no tolls at all. Making people pay tolls for a bridge use tax that is on an interstate doesn't really make sense to me. But I understand if they are a necessity, at least there would be automated digital tolling.

My main comment, though, is going to echo the previous comment. A lift bridge would not really make sense in my eyes to stop traffic or a large bridge that is going under the bridge today doesn't really make sense, it does seem a bit antiquated. My understanding is there's a railway bridge, a BNSF bridge a little further west that swings open, and then river traffic likes to stay on that north side of the river. They don't want to move back towards the middle.

If we could build a bridge that has the span higher in the middle so we don't need to have a

lift, that would make a lot more sense diverting bridge traffic towards the middle of the river rather than staying on the north side. I think barges do use that today rather than go under the middle of the bridge.

And then my last comment would be around light rail. I definitely think light rail is a necessity having traveled around for business and around the world for fun. Any city that has a workable light rail to and from the airport is a huge boom for tourism and business, ensuring that this bridge carries light rail traffic to and from Vancouver would be awesome and something that I would look forward to. Thank you. Thank you for putting this on.

IBR Draft SEIS - RECORD #3018 DETAIL

First Name :	Brian
Last Name :	McDonald
Attachments :	D1-3018_McDonald_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #3018 DETAIL

Submission Date :	11/18/2024
First Name :	Brian
Last Name :	McDonald
Business/Organization/Agency :	self

Submission Input :

I believe my property has beed designated as being in a "Temporary Construction Easement" zone. What does that mean? What if my property value is compromised as a result of the Easement or as a result of the Construction having an adverse effect on my property? What remedies would be provided?

IBR Draft SEIS - RECORD #3019 DETAIL

First Name :	david
Last Name :	earl
Attachments :	D1-3019_Earl_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #3019 DETAIL

Submission Date :	11/18/2024
First Name :	david
Last Name :	earl
Business/Organization/Agency :	personal

Submission Input :

If it is not going to have any more vehicle lanes, i.e. capacity, why build it? I am against the plan , just to be clear .

What about Coast Guard approval for the deck height?

IBR Draft SEIS - RECORD #3020 DETAIL

First Name :	Bob
Last Name :	Ortblad
Attachments :	DSEIS_Ortblad_Original.pdf (20 kb)

BOB ORTBLAD: The site that you're planning to build that bridge is a very difficult site to build a bridge with 200 feet of soft, mushy soil. Your own engineers have described it as basically mush. So it's a very complicated site to build an earthquake-resistant bridge, very complicated, very expensive.

And much safer and more economical was immersed two-tunnel technology that's self-supporting, almost like a floating bridge. Unfortunately, two years ago or almost three years ago now, IBR produced a fraudulent tunnel evaluation, immersed tunnel evaluation. It was proved fraudulent because they more than doubled -- they actually quadrupled the estimated dredging and excavation. I got a hold of their calculations and they had to reduce them by half. They really should have reduced them by three-quarters.

The Coast Guard is still telling the IBR to either evaluate a lift bridge, which nobody wants, or a tunnel. But the IBR continues to ignore or rely on this fraudulent report to dismiss an immersed tunnel. Several engineers other than myself looked at this and agreed that it's much better solution, more earthquake resistant, quicker

to build. Many positives, less environmental than this massive freeway.

It's going to be almost a hundred yards wide and half a mile wide on both banks, huge piles of concrete on both banks with sound and noise pollution -- you can have waterfront parks with the tunnel.

Again, I've been a critic for a couple years now. My Twitter account is full of good, solid reasons and some not-so-solid reasons, I guess, but that's my comment. It's based on a fraudulent evaluation and needs to be redone by consultants independent of WSP which has a vested interest in the bridge. Thank you.

One thing I criticize of this bridge is basically it's going to be the steepest interstate bridge in the country. The Vancouver side, it's going to have a 4 percent slope with an S curve, which it frequently has black ice and fog. It's going to be an extremely dangerous bridge. The 205 Bridge has a wreck almost every other day, it's one of the most dangerous bridges in the country. This bridge will actually be steeper and have a north-facing slope, more prone to ice and snow and wet conditions.

I think, again, an immersed tunnel could be built which would be weather protected. Again, more earthquake resistant, many other advantages.

So I guess I'll use up my time we'll go to the next point. They didn't do a very good job on the EIS on the fish. BPA has spent 20 billion dollars in the last 20, 30 years trying to save the salmon. This bridge is going to cast shadows and provide eddies for predatory fish that will eat the juvenile salmon. There may be no estimate on the damage to the salmon. They've mentioned how it might affect them, but they've made no estimate on the possible damage to the migrating salmon.

IBR Draft SEIS - RECORD #3021 DETAIL

First Name :	Lori
Last Name :	Laupmanis
Attachments :	DSEIS_Laupmanis_Original.pdf (17 kb)

LORI LAUPMANIS: I live just off of 307 and I work on Jantzen Beach, it's about just under 3 miles. Currently if I am going to work, it's about seven to ten minutes. If I'm heading north on any given day, around 1:30 up to 7:30, it takes me an hour and 15 minutes. I don't see how the draft right now addresses the traffic coming off of Marine Drive from the east. I've seen a lot of the different renderings of how the roads are going to go, but I'm concerned about the traffic prior to the bridge.

And just secondly, I do work at Jantzen Beach Moorage. I'm very concerned about the homes that are going to be lost. We are having a housing crisis, and to come in and swoop and take a lot of houses away is very concerning to me.

And if what I saw as well about the access for freeway off of Hayden Island, it appears there's only one way once you get onto the island to take I-5, it's only going north. It doesn't offer an option to drive south back on I-5. You're going to have to take a different road, so I'm just concerned about a lot of it. Thank you for listening.

IBR Draft SEIS - RECORD #3024 DETAIL

First Name :	N/A
Last Name :	N/A
Attachments :	D1-3024_NoName_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #3024 DETAIL

Submission Date : 11/18/2024

First Name : N/A

Last Name : N/A

Business/Organization/Agency :

Submission Input :

While the current bridge is certainly overdue for replacement, eliminating the C street exits is not a viable option. Affordable housing is almost nonexistent in Vancouver, and many of the residents in the Normandy apartments are still struggling to make ends meet. Knocking down that building would leave many vital community members displaced without another option.

IBR Draft SEIS - RECORD #3025 DETAIL

First Name :	Bob
Last Name :	Ortblad
Attachments :	DSEIS_Ortblad2_Original.pdf (18 kb)

BOB ORTBLAD: Just sort of an engineering point or traffic safety point again. IBR's proposing to reverse the grade of the cloverleafs on the Vancouver side. Right now the on-ramp comes down, its cloverleaf comes down, it's the way you should have a cloverleaf, the off-ramp goes up. They're reversing these, they're going to elevate the cloverleaf ramps.

Basically WSP, which is their general engineering consultant on their website, describes cloverleafs as three-way relics, but the IBR and WSP plan to rebuild two freeway relics with basically the wrong grade for that type of a cloverleaf. It's going to be an on up-ramp and a down off-ramp which would be -- tend to cause trucks and cars to spin out on a downward spiral and trucks and cars to slow as they're trying to enter the freeway.

So just another bad design basically besides the 4 percent downgrade with an S curve, so I'll let it go at that. Thank you.

Thank you again for my three minutes. I won't need that many, but basically one of the proposals the IBR has is for building 1270 parking spaces for parking rides at the cost of somewhere around

16 million the last time. I saw these parking rides are right alongside the freeway, all they're going to do is encourage more cars driving on the freeway.

Make much more sense to spend $16 million on downtown housing than housing for cars. It seems like we should be trying to discourage more freeway use instead of encouraging it by building these parking rides. They're not really supported by Federal Transit Association either. Come out of style basically, out of popularity with the transit agencies, so I -- just another fairly dumb idea from the IBR. Thank you.

IBR Draft SEIS - RECORD #3026 DETAIL

First Name :	Sara
Last Name :	Lockwood
Attachments :	DSEIS_Lockwood_Original.pdf (17 kb)

SARA LOCKWOOD: Just as someone who lives in one of the buildings that's slated for demolition with this new project, like, I know that it has to happen. I am supportive of it. I love the idea of the extra stuff on the line on the other side of the bridge in Oregon, but I'm here in Vancouver in my, you know, almost a hundred-year-old apartment building, that is affordable, and I understand that on the other side of current I-5, it's the Fort. But no one's living in some of those buildings, like -- and I know, like, housing is an issue and we're going to take people's housing when there are -- like, nobody's living in some of the buildings on the other side of the current -- like, where we currently are and it's just -- and there are businesses here too that I just -- I don't understand, and I'm not super thrilled honestly.

I don't want to move. I like it here. I like the walkability. I like downtown. I like the vibrancy of it. So thank you. That's all I have to say.

IBR Draft SEIS - RECORD #3027 DETAIL

First Name :	Curtis
Last Name :	Gardner
Attachments :	D1-3027_Gardner_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #3027 DETAIL

Submission Date : 11/18/2024
First Name : Curtis
Last Name : Gardner
Business/Organization/Agency :

Submission Input :

First Name:
Curtis

Last Name:
Gardner

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
I am writing with regard to the proposed Interstate Bridge Replacement (IBR) project for the I5 connection of Oregon and Washington.
While I am in favor of a project to update the bridge and facilitate safe travel via multiple modes, I believe the currently proposed project is much too large and is potentially using old projections of traffic growth which may no longer represent current trends. Thus I encourage a thorough review of project goals and budget to verify that they balance this project with other transportation needs across the two states.
Using the words of the No More Freeways group, I too am "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."
Thank you,
Curtis Gardner
[redacted]

JCA comment #: 746

IBR Draft SEIS - RECORD #3028 DETAIL

First Name :	Seth
Last Name :	Hill
Attachments :	DSEIS-3028_Hill_Original.pdf (2 kb)

IBR Draft SEIS - RECORD #3028 DETAIL

Submission Date : 11/18/2024
First Name : Seth
Last Name : Hill
Business/Organization/Agency :

Submission Input :

You want to make it too big and too complicated. I5 is unusably crowded on a finite area of land. We need to reduce traffic, not add more lanes for it.

- Claim: Freight by truck "expected" to double in the next 25 years
There's *way* too much truck traffic on I5 already. We need to keep (smelly, dirty, loud) trucks out of the city. Put the freight on rail and send it south of Portland, do your truck staging there. That will minimize the heavy traffic going through the city, and keep most trucks off the bridge.

- More traffic lanes more traffic.
I5, particularly the part north of the I84 interchange, has become unusable in the last 5-10 years. Truck traffic is part of it. The squeeze at the I405-I5-I84 junctions is part of it. But this portion of the freeway goes through neighborhoods. It needs *less* traffic, not more.
More heavy traffic means more noise and more pollution - diesel soot - being breathed in by the citizens of North and NE Portland. Keeping the number of lanes restricted and providing alternatives will reduce traffic, and encourage more shipping by rail (to keep heavy traffic down) and commuting by rail (to keep single-occupant car traffic down).

- Fully expand light rail
Most car traffic on the bridge is likely commuters. A highly accessible and convenient rail system will have a huge impact on traffic reduction. Make it a fast commuter line so people can get from their houses in Vancouver to Downtown Portland in 20 minutes, and traffic will drop by 1/3.

Spending bazillions of dollars on a huge monstrosity doesn't solve anything, it's that kind of short-sighted planning that could've added half a dozen more freeways and made Portland a tiny version of LA.

Cars and trucks are fine, but there are physical limits to the number that can pass through a small area, and Portland can't absorb anymore. Don't make the quality of life N and NE Portland residents worse by spending 10 years on construction just to end up creating more traffic jams and a worse situation on the side streets than we have today.

IBR Draft SEIS - RECORD #3029 DETAIL

First Name :	Frann
Last Name :	Michel
Attachments :	D1-3029_Michel_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #3029 DETAIL

Submission Date : 11/18/2024
First Name : Frann
Last Name : Michel
Business/Organization/Agency :

Submission Input :

First Name:
Frann

Last Name:
Michel

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
As someone who bikes and uses public transport, I urge you to make this project more convenient and SAFE for those of us who are not adding to the pollution burden that more combustion engines will entail.
Please put access to transit on the same side of the bridge as the bike trails. The current proposed design has some scary features for people who use multiple modes. If I need to put my bike on a train, or get off the train with my bike, will I have to cross the whole bridge to do that? Up, down, across, when it could be made easily accessible with no changes of grade/elevation or distance barriers. Putting access to transit on the same side of the bridge as the multiuse path will have other benefits, including providing emergency exits in transit emergencies, and sharing of elevators which will streamline construction. But please make it easy and safe for people to bring bikes on (& off) public transit.

And while I am on my bike, will I need to be dodging trucks? Physical separation between walk/bike/roll corridors and freight routes will protect us from trucks veering into our lane. For example, in the current proposed design for the ramp from Vancouver Way to MLK North, the proposed bike/walk/roll route travels down, across, and back up a freight-heavy on-ramp. Surely there can be a redesign that separates walk/bike/roll travel sending it around rather than through the Marine Drive interchange.
I urge you to bring the multiuse corridors together with the transit corridors, but to separate these from freight routes.
Thank you for your attention.

JCA comment #: 745

IBR Draft SEIS - RECORD #3030 DETAIL

First Name :	Amanda
Last Name :	Nicusor
Attachments :	DSEIS_Nicusor_Original.pdf (18 kb)

AMANDA NICUSOR: I am a resident of Jantzen Beach Moorage, and we are going to be really impacted by the construction of the I-5 Bridge. The Moorage is -- has a rich history here from the Jantzen Beach Amusement Park to current times and we're very sad to be losing part of our moorage, part of that history, and many people are very sad, concerned, emotional, unsure about what's going to happen with their housing.

It looks like we're going to lose at least one row, possibly more, and some of our residents permanently. And that -- that's very sad and I -- you know, we do want this to be seismically safe and have adequate transportation. But it's going to be very difficult to manage the impact on our moorage.

So we are concerned about the loss of property, the loss of homes, the loss of income for our organization. We're concerned about the additional expenses that are going to be caused by tolling. I mean, we're trapped by the bridges. We don't have a grocery store. We don't have all of the services that we need on the island, so it's going to be very expensive for people to go and get the necessities that they need and to be able to

move back and forth to be able to go to work and take care of their business.

What else? You know, I think that's all I have to say for now, but this is going to have a very profound impact on how we live here over the next -- you know, you think the construction is going to be five years, maybe it's ten years, maybe it's more. So I would like just compassion to be shown towards the people that are impacted and not just feelings. We need to make sure that those people are taken care of financially and given resources to be able to relocate and assistance be provided to us in the other properties.

I heard a lady speak a moment ago whether in Oregon or Washington that are going to be negatively impacted by this project.

Tolling, a break in tolling is something that I have heard people talk a lot about and not just for our low income residents but for everybody because we're going to have, you know, quality of life issues that come up during construction and just want to try to mitigate those as much as possible and cooperate through that process. Thank you.

IBR Draft SEIS - RECORD #3031 DETAIL

First Name :	Albert
Last Name :	Miller
Attachments :	D1-3031_Miller_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #3031 DETAIL

Submission Date :	11/18/2024
First Name :	Albert
Last Name :	Miller
Business/Organization/Agency :	Resident of St Johns

Submission Input :

First Name:
Albert

Last Name:
Miller

Business or Organization:
Resident of St Johns

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
Hello,

I am writing to express my concern for the proposed IBR. As a cyclist, pedestrian, and primarily non-driver, I do not believe the current proposed IBR is equitably aligned with non-driving users. While IBR will serve as an important freight connection, for the cost of approximately $7 billion is would be a tragedy to overbuild the

number of driving lines while leaving transit, cycling and pedestrian access at a perfunctory level. If we can afford the best for vehicles, why can that same liberal spending not be applied to non-driving uses? Of course, I don't propose we spend needlessly. It is well reported already that the traffic projections used to justify the exorbitant lane sizes and numbers are at best grossly overestimated, and at worst, intentionally inflated to push the desired agenda for the project.

This is the moment for our transportation leaders to listen to the community rather than pushing forward the same tired driving-centric worldview that has created missed opportunities of vibrant urban planning. Portland and Vancouver do need a bridge, and that bridge needs to include freight and cars. But don't forget about the hundreds of thousands of non-driving users of this bridge.

Finally, in concrete terms, I am most critically requesting reconsideration of separating the transit access from the pedestrian crossing. A bridge design that has the transit access disconnected from the pathway will surely result in pedestrian deaths and demonstrates the lack of consideration pedestrians and non-drivers have been given in IBR's design in general.

Signed,
Albert Miller

JCA comment #: 744

IBR Draft SEIS - RECORD #3032 DETAIL

First Name :	Dallas
Last Name :	Dick
Attachments :	DSEIS-3032_Dick_Original.pdf (9 kb)

IBR Draft SEIS - RECORD #3032 DETAIL

Submission Date : 11/18/2024
First Name : Dallas
Last Name : Dick
Business/Organization/Agency :

Submission Input :

First Name:
Dallas

Last Name:
Dick

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
Given the pain involved in designing, approving, financing, and building the new Interstate bridge, it is important that the right decisions are made up front. This means that the bridge needs to be designed for the future, not the past. Perhaps most important is the need to plan for non-motorized traffic. This should not be an afterthought but should have the highest priority along with seismic and cost considerations. Failure to do this will result in a situation not unlike the current bridge which discourages non-motorized transit.
1) 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 means that the multi-use path should be at the bridge's grade from the Vancouver library to the riverfront so that active users have direct access to the bridge. The Vancouver Dip must be eliminated!

2) The design should ensure that active users can easily switch between transit and active transportation at any station, with no grade changes or distance barriers. This encourages users (especially commuters) to forgo their cars, resulting in reduced traffic and air pollution on both sides of the river. To make this happen the active users need to be able to share the elevators used by light rail. Not only is this more efficient but it can result in a significant cost savings for the plan.
3) The design needs to be such that the multi-use path is readily visible by light rail transit operators and passengers. This will make the multi-use path feel more open and safe. Speaking as someone who has ridden most of the multi-use paths in the metro area I can attest to the negative feelings I get when the path is "hidden" as opposed to something like the multi-use path on the levy in Portland.
4) There needs to be proper placement of the multi-use path to protect against noise and debris. Again, from personal experience I can state that I dread cycling over either the current Interstate Bridge or the Glen Jackson Bridge. The noise is intolerable (I actually worry about the noise damaging my hearing) and road debris is always a concern.
5) The design for the multi-use path should result in an enjoyable experience. This means that the path needs to be shaded from summer sun and protected from winter elements. Lighting of the path is also a critical element. Proper lighting results in a pathway that feels safe.
6) Motorized transportation should not be prioritized over active user transportation. Many of the active users, like myself, also drive and pay into the gas tax and also own homes and pay property taxes. Do not assume that someone on a bike or walking is doing so because they can't afford a car and therefore their concerns should not be given equal weight during the design process. Actually, it shouldn't matter what a person's income is when it comes to designing the bridge. Design for people, not cars.
7) Plan for the future, not the past! Climate change requires that we do everything we can to mitigate and prevent the looming disaster. The future will see far fewer cars on the road and more use of light rail and active transit. Plan for this future; our children's and grandchildren's future. The past is gone and will never come again. Make this bridge the envy of the nation and show how we can build toward a TRULY better future.

JCA comment #: 743

IBR Draft SEIS - RECORD #3033 DETAIL

First Name :	Alice
Last Name :	Suter
Attachments :	D1-3033_Suter_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #3033 DETAIL

Submission Date : 11/18/2024
First Name : Alice
Last Name : Suter
Business/Organization/Agency :

Submission Input :

First Name:
Alice

Last Name:
Suter

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Neighborhoods and Equity

Comment:
This bridge needs to be accessible to people who are not able to navigate it. My niece is disabled and she would never be able to enjoy crossing it. We need an elevator!

JCA comment #: 742

IBR Draft SEIS - RECORD #3034 DETAIL

First Name :	Sean
Last Name :	McClintock
Attachments :	DSEIS-3034_McClintock_Original.pdf (1 mb)

IBR Draft SEIS - RECORD #3034 DETAIL

Submission Date :	11/18/2024
First Name :	Sean
Last Name :	McClintock
Business/Organization/Agency :	
Attachments :	Just-Crossing-Alliance-Active-Transportation-Vision-1.pdf (1 mb)

Submission Input :

First Name:
Sean

Last Name:
McClintock

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
The current design for the IBR is based on outdated traffic modeling and does not adequately meet the needs of our communities. Please carefully consider and do all you can to incorporate the recommendations for design improvements provided by the Just Crossing Alliance Active Transportation and Transit Vision report.

This is a once-in-a-lifetime opportunity to build the best solution that considers the realities of today and the likeliest realities of the next 50+ years.

By increasing capacity for vehicles, you are facing the reality of Induced Demand. Except for designing the bridge for better, smoother interconnections, I implore you to NOT add any additional vehicle capacity.

Attachment (maximum one):
Just-Crossing-Alliance-Active-Transportation-Vision-1.pdf

JCA comment #: 741

JUST CROSSING ALLIANCE

Active Transportation and Transit Vision

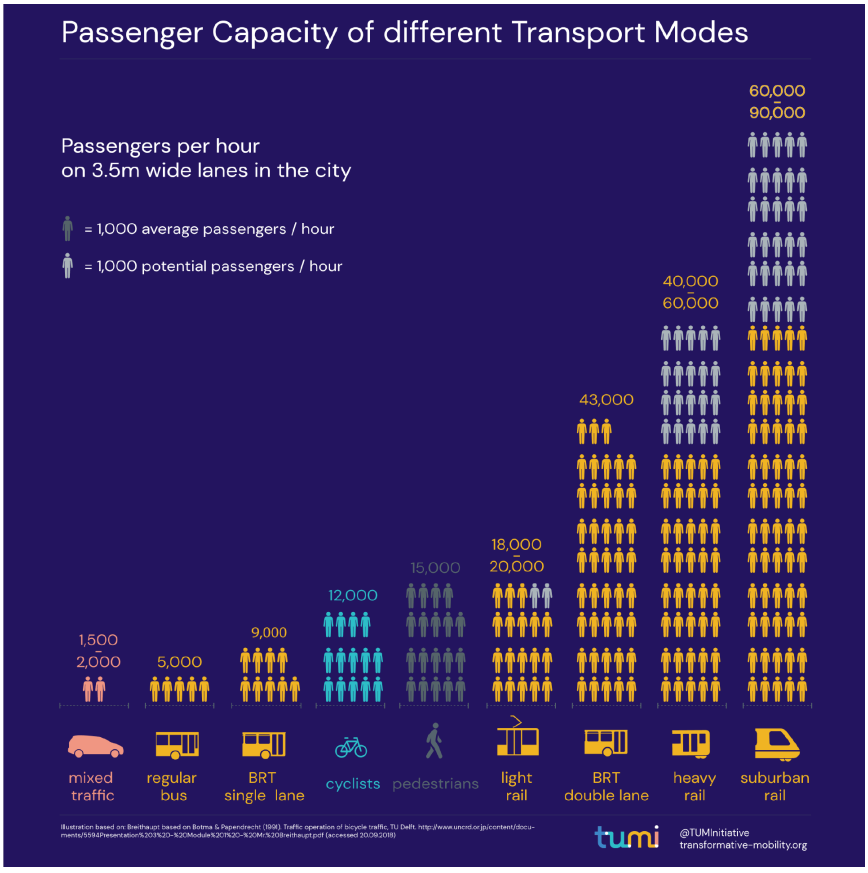
The Just Crossing Alliance seeks the most equitable and sustainable outcomes possible from the Interstate Bridge Replacement Project. We believe that one of the ways to optimize these outcomes is to substantially improve and future-proof the active transportation and transit components of the project in comparison to what is suggested in the Draft Supplemental EIS (DSEIS).

The Alliance would like to acknowledge the excellent work of the community-centered Active Transportation Working Group. This document incorporates a number of their ideas and we look forward to their separate and more detailed comments on the DSEIS

Future-proofing the Bridge with Transit Capacity

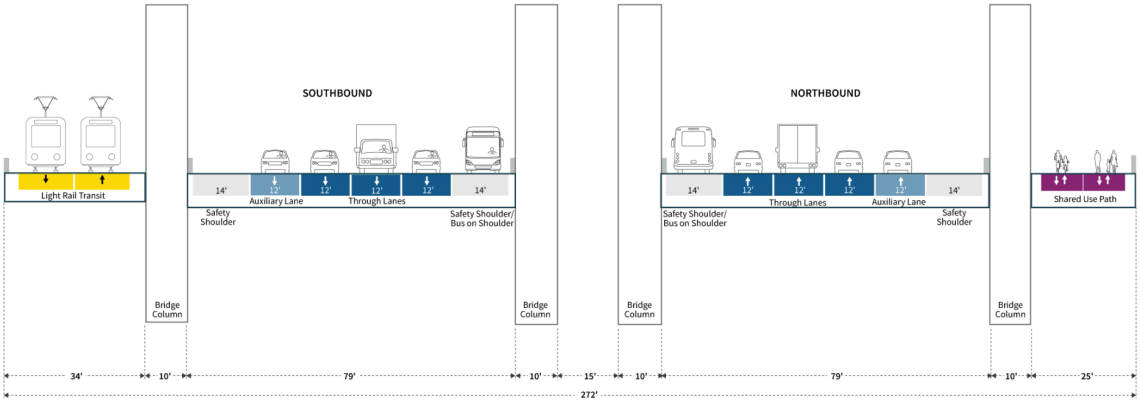
The new bridge will last long past the 2045 horizon year in the DSEIS. It behooves us to ensure that it is capable of supporting passenger travel levels beyond what is considered in the DSEIS. Widening the bridge is likely to be cost prohibitive. We need to look at how space on the structure could be allocated to maximize mobility.

This chart helps us understand the lane capacity of various methods of mobility, and



makes it clear that forms of high capacity transit represent the most efficient use of space. We acknowledge that when the bridge opens, none of the lanes or modes will function to their highest capacity due to bottlenecks or lack of connectivity elsewhere in the corridor. We are looking past opening day, and even beyond the 2045 DSEIS horizon year to a century or more of operation of this bridge.

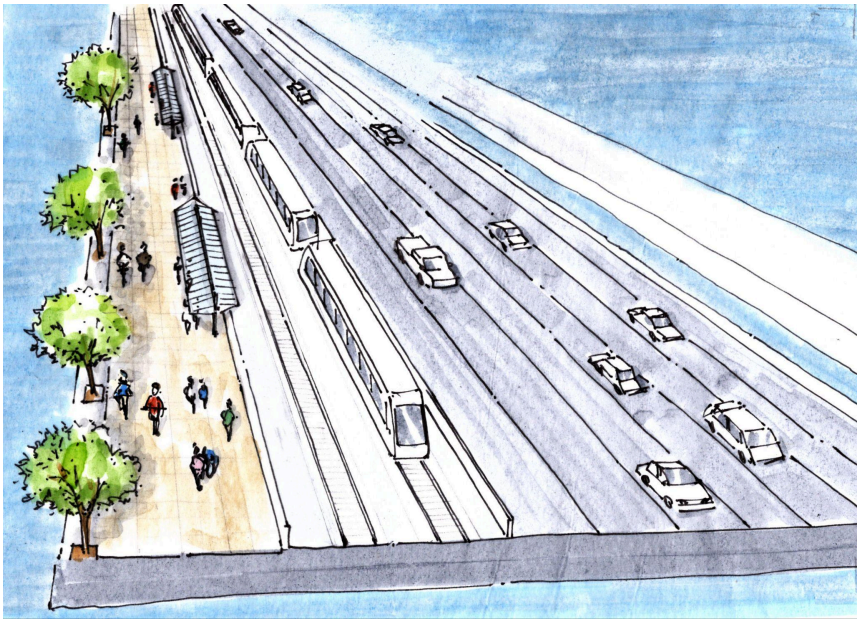
Currently the Modified Locally Preferred Alternative (MLPA), as documented in the diagram below from the DSEIS, allocates 158 feet to motor vehicle capacity, the lowest throughput opportunity, and only 59 feet to transit and active transportation. We don't consider bus-on-shoulder to be an allocation of space, only a borrowing of space from mixed traffic operations.



Ensuring that there are options to reallocate this space to higher throughput uses of transit and active transportation in the future is vital to a responsibly designed project for a climate-resilient future.

Prepare Now for Near Term Light Rail Improvements

The Draft SEIS makes clear that in the immediate future the full potential of Light Rail between Vancouver and Portland cannot be achieved because of the capacity limitations of the Steel Bridge. The Regional Transportation Plan anticipates a future transit tunnel under the Willamette River and downtown Portland. When that happens, **four-car trains will greatly increase transit capacity**. IBR should anticipate that happening within a few decades



and design the four transit stations in the project area to accommodate four-car trains without having to be redesigned and reconstructed.

Consider Now How Transit Capacity Could be Dramatically Increased in the Long Term

When the capacity of Light Rail in the I-5 corridor is maxed out we will need to consider supplementing or replacing it with additional modes like heavy rail or multi-lane BRT. IBR's design should include conceptual approaches for how we would make this fit on the structure we're about to build. Would we have a way to increase the width of the transit way? Or would we convert auto lanes to exclusive bus lanes? Or…? We should be thinking about that now, not in 20 years.

Active Transportation and Transit Should be Partnered, not Separated

The project configuration proposed in the Draft SEIS places active transportation on one edge of the project and transit on the opposite edge of an adjoining structure (or in the two level configuration, underneath separate structures).

We share a view with the Active Transportation Working Group that for numerous reasons, these two modes should be adjacent to each other. Some of these reasons include:

- Users should be able to transition from active transportation to transit or vice versa at any of the transit stations within no more than a few steps (and no grade changes).

- Active transportation users should have elevator access at elevated egress points. Making use of the transit station elevators removes the need for multiple sets of elevators.



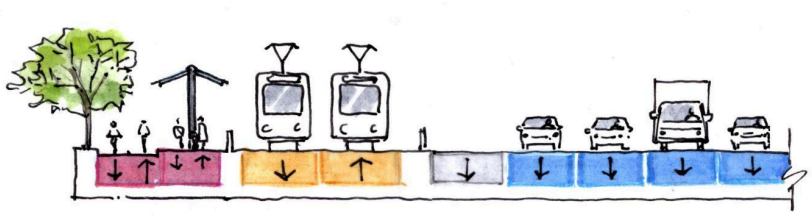
- Transit operators and passengers will serve as "eyes on the path" countering a sensation of isolation and increasing the user security and comfort of the multi-use path.

- The multi-use path can serve as emergency egress for the transit way.
- Inclusive design principles should be employed to make sure that the transit and active transportation components are as accessible as possible.

Furthermore, if a single-level configuration is selected, the multi-use path should be on the outside of one of the structures, next to the transit way which will serve as a buffer from noise, vibration and debris from the motor vehicle lanes.

Protect and Connect Active Transportation

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.



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.

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.

IBR Draft SEIS - RECORD #3035 DETAIL

First Name :	Sara
Last Name :	Sundquist
Attachments :	D1-3035_Sundquist_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #3035 DETAIL

Submission Date : 11/18/2024
First Name : Sara
Last Name : Sundquist
Business/Organization/Agency :

Submission Input :

First Name:
Sara

Last Name:
Sundquist

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
As a frequent traveler to see family in Vancouver, WA, we enjoy going between Vancouver and Portland for recreational activities and leisure. The traffic congestion can be frustrating. I would very much like to see public transportation across the bridge as well as a separated bike/ped way. We need to prioritize alternative modes of transportation when building new projects and retrofitting old for environmental reasons and quality of life for all transportation users.

JCA comment #: 740

IBR Draft SEIS - RECORD #3036 DETAIL

First Name :	Avery
Last Name :	Johnson
Attachments :	D1-3036_Johnson_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #3036 DETAIL

Submission Date : 11/18/2024
First Name : Avery
Last Name : Johnson
Business/Organization/Agency :

Submission Input :

First Name:
Avery

Last Name:
Johnson

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
No more freeway expansions without increasing the availability and convenience of all other forms of transportation! The lack of public transit, walking, and biking infrastructure is the other side of the induced demand coin- People who commute in cars on I-5 often have no viable choice of transportation besides a car. Improving this bridge is a necessity, but there is no justification for additional car lanes, especially as the bridge is not in itself a bottleneck. Make public transit easy and fast, and traffic will be reduced .

JCA comment #: 739

IBR Draft SEIS - RECORD #3037 DETAIL

First Name :	Duncan
Last Name :	Baruch
Attachments :	D1-3037_Baruch_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #3037 DETAIL

Submission Date : 11/18/2024
First Name : Duncan
Last Name : Baruch
Business/Organization/Agency :

Submission Input :

First Name:
Duncan

Last Name:
Baruch

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
Considering the perilous state of the world (climate, wars, mass migrations, and more), enabling projects like the I-5 crossing are a part of the "Don't look up" phenomenon. The Pacific Northwest has escaped much of the weather-related devastation present in other parts of the country and the world so far. Scientists have absolutely no doubt "so far" will be short-lived. It is almost past time to recognize this future and act accordingly. End the I-5 project!

JCA comment #: 738

IBR Draft SEIS - RECORD #3038 DETAIL

First Name :	Christopher
Last Name :	Ogden
Attachments :	D1-3038_Ogden_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #3038 DETAIL

Submission Date : 11/18/2024
First Name : Christopher
Last Name : Ogden
Business/Organization/Agency :

Submission Input :

I am opposed to any shut down of the I5 bridge until we've built another Columbia river crossing. The current proposal is short term "5 year min" economic devastation due to increased traffic and provides zero long term relief.
Clark County also opposed any light rail boondoggles into our community.

IBR Draft SEIS - RECORD #3039 DETAIL

First Name :	Benjamin
Last Name :	Courteau
Attachments :	D1-3039_Courteau_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #3039 DETAIL

Submission Date : 11/18/2024
First Name : Benjamin
Last Name : Courteau
Business/Organization/Agency :

Submission Input :

First Name:
Benjamin

Last Name:
Courteau

Business or Organization:
Flying Bear Farm

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
A new I-5 bridge should:

Maximize transit, including at potential future HSR crossing. We need to stop building more traffic lanes on our freeways and start moving people more efficiently. Let's leave the highway capacity for freight and non commuters who cannot be served by rail or transit.

JCA comment #: 737

IBR Draft SEIS - RECORD #3040 DETAIL

First Name :	Dick
Last Name :	Walker
Attachments :	D1-3040_Walker_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #3040 DETAIL

Submission Date :	11/18/2024
First Name :	Dick
Last Name :	Walker
Business/Organization/Agency :	

Submission Input :

I approve the best (if most expensive) bridge. There will be future bride repairs that are at least 70 years in the future, so the best design is worth it. Also means buildings, property, environment, and civil needs.

I have asked Washington State Department of Ecology to assist whatever they need to do to help.

IBR Draft SEIS - RECORD #3041 DETAIL

First Name :	Bob
Last Name :	Ortblad
Attachments :	DSEIS_Ortblad3_Original.pdf (18 kb)

BOB ORTBLAD: I'll make some comments on your video. The video basically is flying over several hundred feet, I suspect, it has no -- gives you no idea the impact at the ground level of the IBR's -- I've asked for years for them to come up with graphics that show the ground level impact, and IBR's not produced a single graphic that really shows the impact of what will happen on the ground.

This freeway is going to be massive. It's going to be literally a hundred yards of length of a football field wide. It's going to be 270 feet wide, almost the length of a football field, and cover acres and acres of both Hayden Island and downtown Vancouver and it will be elevated down. Now the freeway's kind of down in a trench, this is going to be up in the air and it's going to be a real blight on both shores of the Columbia.

Also, the freeway's going to go right over Terminal 1's proposed public market. I mean, I've lived in Seattle, and they always say public markets are the heart of Seattle. You're going to have a public market with a stillbirth. The freeway's proposed to go right over the top of Terminal 1's proposed public market. I doubt anybody's going to want to shop underneath the roar

and pollution that the freeway's going to dump down on their vegetables. So thank you.

IBR Draft SEIS - RECORD #3042 DETAIL

First Name :	Nicholas
Last Name :	Strickler
Attachments :	D1-3042_Strickler_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #3042 DETAIL

Submission Date :	11/18/2024
First Name :	Nicholas
Last Name :	Strickler
Business/Organization/Agency :	

Submission Input :

The I-5 bridge replacement is an important project that needs to include safe biking, busing, and tram access along the route. As an avid cyclist I know how not bike friendly the current bridge is and would like to see that change. The bridge needs to include extensive train / light rail extending deep into both Vancouver and Portland areas. Both of their downtown areas need more people and more business, and this is a great opportunity to integrate both downtowns. Keep costs low for low income and marginalized communities from the get go, and help revitalize and connect our growing urban areas. Pedestrians and those with physical disabilities need to be able to easily access and use whatever you build. Don’t waste our money on something that will need to be replaced / fixed later. Thanks.

IBR Draft SEIS - RECORD #3043 DETAIL

First Name :	Richard
Last Name :	Slackman
Attachments :	DSEIS_Slackman_Original.pdf (20 kb)

RICHARD SLACKMAN: Yeah, I do thank you for putting this together. I really wish it was a two-way conversation so if somebody has comment and if it's wrong, we could get straight dealt right upfront.

I want to piggyback on Lori and Amanda, they are neighbors and friends of mine. I live at the Moorage, Jantzen Beach Moorage. I've been here close to 20 years. I can tell you that about every four or five years I sit through the same meeting. They've proposed building this bridge since the day I got here and probably four or five years prior to that. It gets all the way up to a head, and then they realize it's just totally impractical or whatever and it never gets done, so I am really not that worried about it because it hasn't happened before. But in case it does, my concern, much like Lori's and Amanda's, is to be sure that the people that are impacted and are going to be forced to move and relocate are taken care of. I don't want to see them just thrown off the Moorage, thrown out of this area and up to them to figure out how to continue with their lives. That's important to me.

The Moorage itself, as Lori said, is going to be heavily impacted. We all pay dues here and our

monthly dues support the Moorage, and if we lose 50 families, well, it possibly means that the remaining people that live here, their dues are going to go skyrocketing to make up the difference because the rest of the Moorage doesn't change, we just lose the homeowners association dues from the people that will be forced to leave.

Many residents here are retired, in fact across Hayden Island, but certainly at this Moorage, and additional money whether it be in tolls or any additional expenses to them is going to be very difficult for a lot of these people to manage and to absorb. I just want everybody on the commission to be very aware of that.

It's also going to impact major retailers, Home Depot's going to lose business, Target, and some of the other retailers and we that live here have come to rely on these businesses. It's very convenient to have Home Depot and not have to get in your car, you can just walk there. If we lose Home Depot, if we lose Target, that's going to be a big loss.

My personal concern about all of the aforementioned is as I get older I have found that I need more medical attention, and anybody that's

crossed that bridge and into retirement is probably well aware of that. 99 percent of my medical attention comes from downtown Portland, OHSU to be specific. It's my understanding -- I can't for the life of me figure out how I get from my house onto I-5 South without driving halfway around Vancouver just to get on I-5 South.

Anything that this project is going to do that's going to impede my access to medical facilities is a hardship without question, and I'm sure that that is going to spread across all the people that live in this area and in Vancouver that rely on health facilities, hospitals, and what have you in downtown Portland. So I think that needs to be addressed.

I'm not sure how you get on I-5 South and if it's going to be any harder than it is right now. Right now it's easy, we just drive down a street, around a couple of turns, and we're on I-5 South. I don't see how that's going to happen with this new project. So I think that needs to be clarified. And that's really all I had to say. Thank you for listening.

IBR Draft SEIS - RECORD #3044 DETAIL

First Name :	Bob
Last Name :	Ortblad
Attachments :	DSEIS_Ortblad4_Original.pdf (18 kb)

BOB ORTBLAD: I'd just like to comment on -- several people have mentioned they'd like light rail. The light rail stations are going to be -- on the Vancouver side about 80 feet in the air. I think they're going to be 40 feet up in the air on the Hayden Island side. They're going to require elevators, not very good locations. The high bridge dictates these high transit stations. Pretty impractical to have elevators to get to these stations and basically one's going to be right over the -- have to take down the Hurley Tower to build the station in -- so the -- one of the great advantages of the immersed tunnel, basically, if you put the traffic in that and recycle the two existing bridges for -- one for maybe local traffic and walking and one for the light rail, keep it down at the ground level, make it much more simple and less expensive.

I think right now those bridges are -- they say it's going to cost up to a quarter billion to take them down, 250 million. I think the earthquake danger has been totally overhyped. And if you build an immersed tunnel for traffic, you would have a secondary connection anyway and then use the existing bridges for walking and biking.

And, again, you wouldn't have a 80-, 90-foot climb. The bike trails are absolutely ridiculous. I mean, I could not climb that. I walk with crutches, there's no way I could climb the ramp to get up on this bridge that they're proposing with the 90 -- 80-, 90-foot spiral. I mean, you're going to have to be an Olympic cyclist to get on that bridge.

So, basically, an immersed bridge would be simpler, cheaper, the more rational solution. Unfortunately, it was, again, fraudulently disqualified and, actually, the subsequent revision I don't think was ever promulgated -- the LPA decision was based on this fraudulent evaluation and two years they should have -- two revisions that I don't think were ever promulgated properly to the eight agencies that made this decision on the LPA. Thank you.

IBR Draft SEIS - RECORD #3045 DETAIL

First Name :	Amanda
Last Name :	Nicusor
Attachments :	DSEIS_Nicusor2_Original.pdf (17 kb)

AMANDA NICUSOR: Thank you. I just had one more comment quickly and that is regarding the construction impact on the submerged land like the soil that supports our pilings and the rows that will be remaining and how that might also impact with the boats going back and forth or whatever is occurring there.

The bank erosion, very concerned about losing more bank in the process of this, and so what would the impact of the construction be on our land and our environment here. Thank you.

IBR Draft SEIS - RECORD #3046 DETAIL

First Name :	Lee
Last Name :	Harrison
Attachments :	D1-3046_Harrison_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #3046 DETAIL

Submission Date : 11/18/2024

First Name : Lee

Last Name : Harrison

Business/Organization/Agency :

Submission Input :

The baseline design of the bridge should remove light rail and substitute bus rapid transit (BRT), probably as a designated transit/HOV in addition to the 3 through lanes 1 lane local access, with possible provisions for rail at some future point if warranted by new technology or other circumstances unforeseen at this time. BRT would be cheaper, faster and more flexible than rail and also provide more point-to-point destinations. The new bridge should also respect the constraint of providing the same or greater air draft clearance for shipping as the current bridge (178 feet or more); such clearance could be provided by a bascule design. Mid-span clearance could be set higher than the current roughly 70 feet (say 90-95 feet) to minimize the need to open the draw bridge span. Tolling should be avoided for general purpose lanes, as it not only has high overhead collection costs but because it would not be a significant funding source compared to the total project cost - note continued debt on the Tacoma Narrows toll bridge. By Washington State highway practice, HOV lanes might be considered for tolls to maintain BRT speed if necessary.

IBR Draft SEIS - RECORD #3047 DETAIL

First Name :	Richard
Last Name :	Kolber
Attachments :	DSEIS_Kolber_Original.pdf (16 kb)

RICHARD KOLBER: One comment I would like to make concerning the comment on the earthquake danger on the bridge, I would like to refer to the damage that the earthquake did to the San Francisco Oakland Bay Bridge where they had to replace the whole span and that bridge was a lot newer than the bridge we're talking about.

IBR Draft SEIS - RECORD #3048 DETAIL

First Name :	Tim
Last Name :	Duncan
Attachments :	DSEIS_Duncan_Original.pdf (17 kb)

TIM DUNCAN: I have a concern not only from a lot of the other concerns that have already been addressed, but I have a concern about the arterial bridge, I think that's the bridge that's going to go from North Portland Harbor to Hayden Island. I'm worried about that becoming a commuter bottleneck and us on the island not being able to commute very happily to North Portland and back. I can see that easily because there's so much traffic off of Marine Drive. I can see easily those coming from the west going to Vancouver will not get on I-5 there, but hop over the arterial bridge to Hayden Island and then get on 5 North from there and vice-versa coming back the other way, so I'm really concerned about that and I hope that will be addressed and I look hearing back about that. Thank you.

IBR Draft SEIS - RECORD #3049 DETAIL

First Name :	Bob
Last Name :	Ortblad
Attachments :	DSEIS_Ortblad5_Original.pdf (17 kb)

BOB ORTBLAD: The comment about the earthquake in the Bay Area -- well, basically when I sent this into the IBR before. Basically when that quake happened, the Bay Bridge came down but the immersed tunnel for BART which is 3 miles underneath the bay kept running to stop it all.

So, actually, it just proved that immersed tunnels, there's a couple dozen of these in Japan, they're much more resistant than a bridge, and I've made that point several times to the IBR. Thank you.

IBR Draft SEIS - RECORD #3050 DETAIL

First Name :	Emily
Last Name :	Toops
Attachments :	DSEIS-3050_Toops_Original.pdf (2 kb)

IBR Draft SEIS - RECORD #3050 DETAIL

Submission Date : 11/18/2024
First Name : Emily
Last Name : Toops
Business/Organization/Agency :

Submission Input :

As a bike commuter and someone who prefers to use multi-modal transit when possible, the existing plan has a few items of concern. With the transit facilities and active transportation routes on opposites sides of the bridge, this makes multi-modal transportation in an already not-particularly-bike-friendly world. While I understand the majority of people use cars, this project provides an opportunity to give people options. However, the current plan doesn't offer the best solutions for non-car-centric users. Things like protected/separate bike and pedestrian lanes can go a long way to helping people feel more comfortable uses these methods of transit (and helps get cars off the road, easing congestion for those who cannot use alternative means). I live near MLK and Vancouver/Williams, and it would be wonderful if the corridors all felt safe, were easy to access, were well-connected to existing infrastructure, were separated from freight, and took elevation into consideration (not everyone has an e-bike or the physical abilities for steep grades).

The current plan needs to consider:

- elevation of bike/pedestrian paths --> currently too high in places
- how far out of the way cyclists/pedestrians have to go to access the new paths --> currently cumbersome, especially distance between transit facility and paths
- separation of bike/pedestrian paths from high-traffic and freight roads (ideally going around and not through busy interchanges) --> currently concerns the ramp from Vancouver Way to MLK, the Marine Drive interchange, the Vancouver/Williams corridor, and the proposed connection to the Bridgeton Trail
- safety (from vehicles, debris, potential conflict between those on the paths and unhoused persons, plus access for emergency vehicles) --> bike/pedestrian paths should be placed on the outer side, next to transit lanes if a single level bridge is selected

From a financial perspective, building the new bridge and associated multi-use transit paths the correct way first is the most cost-effective, as retrofitting or redoing parts to meet the needs of users is always more expensive. Build it right the first time, give people options for transit that suit their needs, as well as options that reduce pollution (both noise and emissions).

IBR Draft SEIS - RECORD #3051 DETAIL

First Name :	Donna
Last Name :	Hanson
Attachments :	DSEIS-3051_Hanson_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #3051 DETAIL

Submission Date :	11/18/2024
First Name :	Donna
Last Name :	Hanson
Business/Organization/Agency :	

Submission Input :

No to transportation access from Portland to Vancouver. I see the bus along Mill Plain and hardly anyone is using it. Bus transportation in Clark County is unused and unneeded.

IBR Draft SEIS - RECORD #3052 DETAIL

First Name :	Joshua
Last Name :	Landry
Attachments :	DSEIS_Landry_Original.pdf (18 kb)

JOSHUA LANDRY: Yeah, I've got a story but I will get to the point here. So my name is Joshua, I live on JBMI. My house will likely be in the sights for this bridge project to be removed.

A little bit about myself, I live here on the water. I started out in 2007, I came from the East Coast to the West Coast to go to sea. I was very unsuccessful until I got on tall ships and sailed up and down the West Coast. I was looking for nature and camaraderie, and I found those things and I remember going out in October on the coast of -- the Oregon Coast in 35-foot seas and being the only person on the helm and waking up the next morning just to mountains of chipped glass and just thinking, like, there's nowhere else in the world that I'm supposed to be than right here, right now.

So, for me, going to sea was, I thought, more of an exorcism; I found out later it was more of a pilgrimage, and I found kind of what I was looking for. I'm from Illinois originally. My last name literally means dry land, opposite what I was raised with.

Now I live on the water, and every morning I wake up and I look at how beautiful it is and I feel that same feeling I felt back then of being,

there's nowhere else in the world than right here, right now.

And this bridge, in particular the light rail extension, will destroy our community because it's going to wipe out our homes and they can't be replaced, you can't build new moorages for these things. We own our slips which is unique.

Yeah, and now I have my 100-ton captain's license. I'm an ABYC member of boat yacht council master technician, I work and I live on the island, the two are engrained with each other. But, yeah, it's a special thing, and we talk about it all the time about how sacred it is, how amazing it is because we see ducks and beavers every day, which, I mean, is there two more classic Oregon animals out there? We have otters and herons. It's just a rich, just ecological space, and just to be part of that, it's quieting, you know. And I have that connection in nature and camaraderie.

I know all my neighbors. I didn't know that when I lived in Portland proper or anywhere else for that matter. It's just such a tight-knit community and it's just very special, it's very unique and I think that's it for that, so. Yeah, but thank you for doing this and hearing us.

IBR Draft SEIS - RECORD #3053 DETAIL

First Name :	Daniel
Last Name :	Heffernan
Attachments :	DSEIS-3053_Heffernan_Original.pdf (6 kb)

IBR Draft SEIS - RECORD #3053 DETAIL

Submission Date : 11/18/2024
First Name : Daniel
Last Name : Heffernan
Business/Organization/Agency :

Submission Input :

First Name:
Daniel

Last Name:
Heffernan

Email:
djheff1@gmail.com

City:
Portland

US States:
OR

Zip:
97232

Topic Area:
Transportation

Comment:
I cannot support the current design plans for the new interstate bridge. The active transportation designs for bikes and pedestrians are not only ugly and uninviting, they are ridiculous designs that in essence make the bridge a wall. No one will regularly ride up a 150' corkscrew to a cantilevered platform and back down. Maybe convert the existing I-5 bridge to a bike/ped facility? Regardless the proposed options for active transportation on the new bridge may check a design box but they do nothing to support or encourage active transportation uses. Start over!

JCA comment #: 736

IBR Draft SEIS - RECORD #3054 DETAIL

First Name :	Bob
Last Name :	Ortblad
Attachments :	DSEIS_Ortblad6_Original.pdf (17 kb)

BOB ORTBLAD: About five years ago, Roger Millar, which is the head of the Washington Department of Transportation, gave a speech to the American Association of State Highway and Transportation Officials. He said it was physically impossible to fix congestion, so -- but he's supporting a 5-mile expansion of adding one, maybe two lanes to relieve congestion. It's been proven over and over again that an extra lane just increases congestion, increases induced demand, so not me saying.

It's imprudent expenditure of probably up to $9 billion by the time this is done, much better to build a -- not expand the freeway. I would suggest building an immersed tunnel for traffic and repurposing the two existing bridges saving probably somewhere in the order of $5 billion.

So that's something more to add to the -- but, basically, Roger Millar obviously is a national authority, he was the head of the American Association of Highway and Transportation Officials for a while. He said you can't fix congestion with more money. Okay. Thank you.

IBR Draft SEIS - RECORD #3055 DETAIL

First Name :	Andre
Last Name :	Jaurigui
Attachments :	DSEIS_3355_Jaurigui_Original.pdf (6 kb)

IBR Draft SEIS - RECORD #3055 DETAIL

Submission Date :	11/18/2024
First Name :	Andre
Last Name :	Jaurigui
Business/Organization/Agency :	Multnomah County

Submission Input :

First Name:
Andre

Last Name:
Jaurigui

Business or Organization:
[redacted]

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
I want to voice concerns regarding the current plans for the Interstate Bridge Replacement (IBR) project. While

I fully support the need for a new, seismically sound bridge between Oregon and Washington, the proposed design raises significant concerns regarding its scope, cost, and overall impact.

First, the project is overly ambitious—more than a simple bridge replacement. The scale of this proposal results in excessive costs, undue impacts on surrounding neighborhoods in South Vancouver and North Portland, and disruptions to bicycle and transit users. The economic and traffic models guiding these plans appear flawed, leading to an overbuilt structure that risks exacerbating congestion on I-205 while creating unnecessary burdens on the community.

Additionally, the lack of transparency in the planning process is troubling. This is a massive public investment, and the community deserves clear and honest communication about its implications. Tolls, for instance, will likely reduce congestion on the bridge, which underscores the need to downsize auxiliary lanes, streamline interchange designs, and reduce overpass heights. Smarter, more efficient planning is essential.

The proposed design also neglects critical considerations for active transportation and public transit. Plans to place light rail and active transportation routes on opposite sides of the bridge—and the use of a cumbersome, 100-foot high spiral ramp for access—show a lack of care and foresight. Connections to key corridors, such as Vancouver's Evergreen and Portland's Vancouver/Williams routes, should be prioritized to promote accessibility and efficiency.

In terms of public transit, stations should be built to accommodate future needs, such as four-car trains to align with downtown transit upgrades. Forward-looking infrastructure must also consider higher-capacity transit systems, like multi-lane Bus Rapid Transit (BRT) or heavy rail, to meet long-term demands.

Finally, this project must address economic and racial equity. A low-income toll discount program should be in place from day one of tolling to prevent undue financial strain on vulnerable communities. Furthermore, freeway impacts such as noise and environmental effects often disproportionately harm historically marginalized groups. We must prioritize equity in every aspect of this project.

In conclusion, while a new Interstate Bridge is essential, the current proposal is an overreach. By scaling back the design, improving transit and active transportation integration, and prioritizing equity and sustainability, we can create an infrastructure project that meets our region's needs today and tomorrow.

Thank you for your time and consideration.

JCA comment #: 735

IBR Draft SEIS - RECORD #3056 DETAIL

First Name :	Heather
Last Name :	Stebbings
Attachments :	Shaver.pdf (102 kb)

SHAVER

November 18, 2024

Interstate Bridge Replacement Program
Attn: Draft SEIS Public Comment
500 Broadway Street, Suite 200
Vancouver, WA 98660
Submitted via: draftseis@interstatebridge.org

RE: Draft SEIS Public Comment

Thank you for the opportunity to provide comments on the Draft Supplemental Environmental Impact Statement (Draft SEIS) for the I-5 Interstate Bridge Replacement (IBR) Project.

Shaver Transportation is a 6th generation family-owned tug and barge company located in Portland, Oregon and for more than 140 years, we have operated on the Columbia Snake River System (CSRS). We are proud to have 135 employees, a fleet of 15 tugboats and 22 grain barges, and four lines of business – ship assist, bulk commodity transportation, harbor/marine services and emergency response and rescue - all of which are tied to ensuring the safest and most efficient use of the CSRS navigation infrastructure. Shaver Transportation supports replacement of the IBR, as it is a critical component of the multi-modal freight transportation network supporting Pacific Northwest communities and economies.

In addition to the surface transportation component of the IBR, there is a major Maritime Administration (MARAD) designated Marine Highway, the M-84, stretching under the bridge from the Mouth of the Columbia River 465-miles to Lewiston, Idaho. Shaver operates along the entire stretch of the M-84, transporting hundreds of barges of wheat and other products along the inland portion of the CSRS each year, and providing ship assist services for deep draft vessels calling ports and facilities from Astoria, Oregon to Vancouver, WA.

We appreciate the outreach efforts by the IBR team to engage the navigation community, model design comparison impacts on the marine highway, and take our feedback into consideration when developing the Modified Locally Preferred Alternative (Modified LPA). Specifically, we are encouraged that the DEIS Modified LPA includes:

- Wider Horizontal Navigation Clearance (HNC) to 400’ for both the single-level fixed-span configurations and the single-level movable-span configuration.
- Improved channel alignment between the BNSF Railway Bridge and Columbia River bridge.

There are several areas in the Draft SEIS, however, that Shaver feels the need to comment on. It is extremely important to ensure an accurate Final SEIS that limits impacts on the marine

4900 NW Front Avenue | Portland, Oregon 97210
P.O. Box 10324 | Portland, Oregon 97296
shavertransportation.com

503.228.8850
503.228.8847 (TUGS)
503.274.7098

highway transportation system during construction of the new bridge, and throughout its operation.

Section 3.2 - Navigation

The DEIS states "An important goal of the IBR Program is to meet the reasonable needs of navigation on the Columbia River…." The term "reasonable" can often be subjective, and entities outside of the maritime community may not bring the perspective needed to understand what is "reasonable" vs. unreasonable for marine operators. Shaver's top priority is to ensure the safety of our crew members and vessels, and our decision making reflects this. We respectfully request that the IBR team directly engage with tug operators to fully understand our needs and requests throughout IBR construction and when fully operational.

3.2.1 Changes or New Information Since 2013

We request all navigation restrictions during construction be documented in this section, as these impacts include new information since the Columbia River Crossing Locally Preferred Alternative (CRC LPA) was identified in 2013.

3.2.2 Existing Conditions (North Portland Harbor)

The DEIS incorrectly states that the "North Portland Harbor does not include a designated navigation channel." This needs to be corrected to note that there is a federally authorized navigation channel in the North Portland Harbor. The Oregon Slough was authorized by the Rivers and Harbors Act of 25 July 1912 and includes a 20-foot-deep channel from river mile (RM) 1.5 to 3.8. Diversified Marine Inc. is located on this waterway and provides vessel construction and repair services for Shaver Transportation's fleet of tugboats, along with services for many other companies in the maritime industry. Maintaining an accurate description of this waterway and ensuring unencumbered access to the DMI facility for tugs and smaller vessels is extremely important, both during IBR construction and when the IBR is fully operational.

3.2.3 Long-Term Effect, Vessel and Operational Adjustments Associated with Columbia River Fixed-Span Bridge Configurations

The DEIS notes that there would be multiple river users restricted by a 116-foot vertical navigation clearance (VNC) under the Modified LPA fixed-span configuration. The IBR must work with these affected users to ensure they are able to transit under the bridge year-round.

Marine contractors provide specialized construction and repair services to a range of industries upriver of the IBR. If these entities cannot transit under the IBR, there would be direct impacts to marine users such as Shaver Transportation, as we utilize crane barges to service our upriver facilities including docks, dolphins, and spud barges. These assets are a critical component of the services we provide for our customers, and are incorporated into the overall efficiencies of the barging network. They allow for tie-off locations as barges are individually moved to and from grain-loading facilities located from The Dalles, Oregon to Lewiston, Idaho.

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P.O. Box 10324 | Portland, Oregon 97296
shavertransportation.com

503.228.8850
503.228.8847 (TUGS)
503.274.7098

Marine contractors also provide niche services for the U.S. Army Corps of Engineers (USACE) on the lock and dam system, and -14' inland barge channel. USACE utilizes these contractors at all times of the year for planned maintenance, routine and non-routine dredging, and emergency repairs which require immediate response.

The DEIS also notes that the USACE Dredge *Yaquina* will be impacted by the VNC of a fixed-span configuration. While the DEIS states that the *Yaquina* operations would only be impacted 1% of days in a typical year, future river flows are uncertain due to a range of variables. The *Yaquina* needs continued access as required by the USACE to maintain safe and efficient navigation of the federally authorized navigation channel above the IBR. It is unacceptable to require vessel operators to reduce loads or implement draft restrictions due to IBR construction, and Shaver strongly suggests the IBR team work with the USACE to ensure there are no impacts to their dredging program or overall navigation mission during construction or long-term.

3.2.4 Temporary Effects (Modified LPA)

The temporary impacts of river closures, even for short durations, have a rippling effect on the regional transportation network. Closures are costly to businesses, impact inland and deep draft ports and facilities, decrease efficiencies on the marine transportation network, and cause significant backups throughout regional and national supply chains, not just on the M-84. For these reasons, Shaver requests that the IBR Team make every effort possible to limit river temporary closures and delays.

We specifically request that Section 3.2.4 be updated in the Final SEIS to ensure tug operators are not required to break up tows during construction. The DEIS states that the HNC of the south barge channel will be constrained at times during the 4- to 7- year duration of construction, and that barge tows will need to be changed from 2-barge (length) by 2-barge (abreast) tows to a narrower 2-barge (length) by 1-barge (abreast) tow. Shaver requests the Final SEIS reflects all safe transit options, including keeping barge tows intact and using an assist tug made up to the bow of the tow while transiting through the south barge channel.

The program-specific mitigation noted in Section 3.2.6 states that the IBR will "make available an assist tug(s) to support safe navigation when vertical or horizontal clearances are reduced, and assistance is needed to safely navigate the restricted channel." Shaver Transportation requests that these costs are borne by the IBR and not required to be paid by operators.

4900 NW Front Avenue | Portland, Oregon 97210
P.O. Box 10324 | Portland, Oregon 97296
shavertransportation.com

503.228.8850
503.228.8847 (TUGS)
503.274.7098

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3.2.6 Potential Avoidance, Minimization, and Mitigation Measures (Long-term Effects, Avoidance Measures)
This section notes the long-term adverse effects of the IBR on vessels requiring more than 116' VNC. Shaver Transportation would like to reiterate our comments from above regarding temporary impacts and the importance of year-round M-84 transit for marine contractors and for the Dredge *Yaquina*. If modifications of equipment are possible, and agreed to by vessel operators, all costs must be borne by the IBR and not at the operator's expense.

3.2.6 Potential Avoidance, Minimization, and Mitigation Measures (Temporary Effects, Regulatory Requirements)
Shaver Transportation requests that marine transportation operators are consulted as construction phasing and staging plans are developed. While closures or restrictions will be communicated in advance, input provided by operators during the early planning stages will minimize disruption of our operations and for customers, and will be critical in preventing unintended consequences of decisions made without operator input. Shaver Transportation also strongly suggests that the IBR coordinate with the USACE to align IBR closures with the USACE annual Columbia Snake River System maintenance outages, to avoid multiple river closures.

3.2.6 Potential Avoidance, Minimization, and Mitigation Measures (Temporary Effects, Program-Specific Mitigation)
Shaver appreciates the IBR Program's mitigation efforts. As noted above, any costs related to this mitigation, including those required for assist-tugs or vessel modifications, should be at IBR expense.

Support for Pacific Northwest Waterways Association (PNWA) Comments
In addition to this comment letter, we support the comments provided by the Pacific Northwest Waterways Association (PNWA), and would specifically like to reinforce their perspective on the following:

- Ensuring consistency between the Navigation Impact Report and the Draft SEIS regarding the Federal Navigation Channel width and depths for the Mouth of the Columbia River, Lower Columbia River, Vancouver to The Dalles, Lower Willamette River and Snake River.
- Integration of Columbia River Treaty (CRT) related operational changes into the Final IBR SEIS. Shaver Transportation participates in monthly discussions with the USACE Northwestern Division regarding the CRT's operational changes that could impact safe and reliable navigation. While CRT operations have not been finalized, we believe some could be significant enough to warrant consideration as the Final IBR SEIS is developed.

We thank you for the opportunity to comment on the Draft SEIS, and we hope you will include our perspective in a final document. This project is aligned with the values of our company to

4900 NW Front Avenue | Portland, Oregon 97210
P.O. Box 10324 | Portland, Oregon 97296
shavertransportation.com
503.228.8850
503.228.8847 (TUGS)
503.274.7098

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support regional multi-modal transportation, and I would be happy to answer any questions you may have after reading our letter.

Sincerely,



Steve Shaver
President

4900 NW Front Avenue | Portland, Oregon 97210
P.O. Box 10324 | Portland, Oregon 97296
shavertransportation.com

503.228.8850
503.228.8847 (TUGS)
503.274.7098

IBR Draft SEIS - RECORD #3057 DETAIL

First Name :	Robert
Last Name :	Polk
Attachments :	DSEIS_3357_Polk_Original.pdf (66 kb)

IBR Draft SEIS - RECORD #3057 DETAIL

Submission Date : 11/18/2024
First Name : Robert
Last Name : Polk
Business/Organization/Agency :

Submission Input :

First Name:
Robert

Last Name:
Polk

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
The proposed IBR project is too big. It is much more than a Interstate Bridge Replacement. Oregon and Washington need a new seismically sound bridge. But the project as currently proposed is too large, too costly, too impactful on both South Vancouver and north Portland, too inconvenient for bicycle and transit users, and based on faulty modeling and economic analysis. The lack of transparency alone is deeply concerning. The tolls necessary to help pay for the project will themselves reduce congestion thereby resulting in an overdesigned, overbuilt bridge, and too much congestion on I-205. Let's reduce the proposed auxiliary lanes, reduce the proposed interchanges, widening north and south, and overpass heights, make the necessary changes to support transit and bicycle uses, and consider adding lifts.

JCA comment #: 734

IBR Draft SEIS - RECORD #3058 DETAIL

First Name :	Lucas
Last Name :	Kerper
Attachments :	DSEIS_Kerper_Original.pdf (21 kb)

LUCAS KERPER: So I guess I have, like, one or two -- a few comments, but then some questions too. I know this isn't really us voting on the project, it's already been passed and everything. I commented about the congestion, yes. Adding new lanes might not make congestion go away, but one thing that will really help is adding light rail, MAX, maybe even a streetcar or something like that. Those are huge infrastructure projects that this area can really benefit from in a big way.

And of course the bicycle and pedestrian connectivity, to me, those are humongous selling points of the whole project. So a concern -- having said that, a concern of mine is that we -- last I heard, we do not have a stamp from the -- what is it? The Coast Guard, the military, of us building a lower deck.

What I would hate to see is for us to get really far into the planning of it, and then all of a sudden at the very last minute the Coast Guard says no, we need that extra height, we need the bridge to be a certain height.

So I think if there's any way we can get a formal go-ahead from the military, that would be truly fantastic I think. So there's that. It's

kind of my big point there.

Probably another thing -- the other thing that I wanted to mention, this is just like very detailed, like, a little bit of a history of me. When I moved to Portland, I sold my car beforehand, this was in the early 2000s and I biked everywhere. I biked to PSU. I did everything by bike. I think a lot of us did in the early 2000s. We were purportedly the number two bicycle city in the world second to Amsterdam.

One truth that I foresee about, like, bicyclists going over the bridge and, I mean, to a certain extent pedestrians and mainly, like, micro-mobility, like the small e-scooters and stuff, is they are going to get to the bridge quite along -- or the road that goes over to the bridge, the I-5 or the path quite a ways before the highway. So, in other words, they're going to go at, like, a smooth, like, up and over. They're going to have to use the staircases right next to the river at the riverfront park.

This second point is specifically just about the staircases or the spiraling ramp right next to the water, right next to the riverfront. I mean, I just don't think they're going to get used very

much and I don't really think that -- I don't know if there's a way -- we should consider kind of downplaying or I don't know if we can even -- maybe we do need them, but, I mean, a grandiose spiraling staircase to allow a bicyclist connectivity to the waterfront right there, I don't think that's going to be as applicable. I mean, it's just something to look into.

If there's a massive, like, bicycle route right next to the river, then maybe. But I don't know, I think a staircase would be fine. A lot of the other bridges in Portland just have staircases, they don't have, like, a grandiose spiraling thing.

And honestly, we could look at those other staircases and see are they really used that much at all compared to our -- are people just going over the bridge, like, entering the bridge earlier on, so that's that.

And then I mean just in summary, like, again, I just praise the light rail capability of the new bridge and, I mean, I have some questions around too, like, it's not really going to be exactly plug and play into a Vancouver system. There's no existing streetcar or MAX over there, but, I mean, obviously this will spur that on, and then of

course that -- I'm sure this has already been studied, like, is -- does Vancouver have enough money to just install a streetcar system or a MAX system. I'm quick to assume it's going to be the MAX, but then again the Vancouver mayor was talking about there being a streetcar in the downtown waterfront area. Streetcars can go up to, like, 50 miles an hour, so a streetcar in theory could totally go over the bridge no problem.

Anyway, that is pretty much my comment. Thank you for giving us this platform to speak on.

IBR Draft SEIS - RECORD #3059 DETAIL

First Name :	Michell
Last Name :	Prunty
Attachments :	DSEIS-3059_Prunty_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #3059 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:
Air Quality

Comment:
Those of us who live close the freeway already have to deal with bad air quality. I run 3 hepa filters in my house. If you aren't aware, most hepa filters can last between 3 months to a year. Mine look awful after just a month. My porch always has a light layer of freeway pollution on it. A freeway expansion is the worst thing you can do for our health.

JCA comment #: 733

IBR Draft SEIS - RECORD #3060 DETAIL

First Name :	Anne
Last Name :	McNeal
Attachments :	DSEIS-3060_McNeal_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #3060 DETAIL

Submission Date : 11/18/2024
First Name : Anne
Last Name : McNeal
Business/Organization/Agency :

Submission Input :

First Name:
Anne

Last Name:
McNeal

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 #: 732

IBR Draft SEIS - RECORD #3061 DETAIL

First Name :	Bob
Last Name :	Ortblad
Attachments :	DSEIS_Ortblad7_Original.pdf (17 kb)

BOB ORTBLAD: I just want to point out that the IBR has a 23 million-dollar communications and PR budget, and over a month ago I sent in five fairly simple public comment questions and the IBR has yet to respond to any of them. It took a couple weeks just to get an acknowledgment, so I think their response has been -- if I understand too, the IBR is not going to publish any of these public comments until 2025 after they've had a chance to sort through them and respond to them and summarize them. I believe they should publish every one online as it comes in. There's no reason they can't. Should let the public see what's going on. Thank you.

IBR Draft SEIS - RECORD #3062 DETAIL

First Name :	Sabrina
Last Name :	Gogol
Attachments :	DSEIS_3362_Gogol_Original.pdf (4 kb)

IBR Draft SEIS - RECORD #3062 DETAIL

Submission Date : 11/18/2024
First Name : Sabrina
Last Name : Gogol
Business/Organization/Agency :

Submission Input :

First Name:
Sabrina

Last Name:
Gogol

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
I've read about ODOT'S challenges modeling traffic correctly throughout this study. I hope ODOT will acknowledge their mistakes, for everybody makes mistakes, and create a new Supplemental Environmental Impact Statement (DSEIS) that better reflects real conditions. This is important because any increased traffic is going to cause pollution that will burden me, and especially burden communities who don't have my intergenerational privileges, especially communities of color that have historically borne the brunt of freeway

noise, pollution and displacement.

JCA comment #: 731

IBR Draft SEIS - RECORD #3063 DETAIL

First Name :	dell
Last Name :	goldsmith
Attachments :	DSEIS_3363_Goldsmith_Original.pdf (3 kb)

IBR Draft SEIS - RECORD #3063 DETAIL

Submission Date : 11/18/2024
First Name : dell
Last Name : goldsmith
Business/Organization/Agency :

Submission Input :

First Name:
dell

Last Name:
goldsmith

Email:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
Don't load us down with this over developed project which will do much more for fossil fuels and heavy traffic, especially big trucks with all their noise and pollution. The destruction and damage to our environment is the most important thing to focus on now.

JCA comment #: 729

IBR Draft SEIS - RECORD #3064 DETAIL

First Name :	Tim
Last Name :	Duncan
Attachments :	DSEIS_Duncan2_Original.pdf (18 kb)

TIM DUNCAN: I just wanted to make another quick comment if I could. First of all, I do want to thank everybody for their great comments and especially Lori and Amanda and Richard. I'm also a member of Jantzen Beach Moorage, resident, and so I really relate to what they discuss.

The other thing I wanted to mention was as I was thinking about traffic flow with the half interchange, it doesn't seem to make sense or I'm wondering what the thought processes were in coming up with having the half interchange northbound centric. That is Hayden Island is Portland, but yet, Vancouver has easy on-and-off access to our island whereas Portland doesn't. North Portland Harbor doesn't, and we don't have readily access to I-5 either on Hayden Island except northbound to Vancouver.

It seems to me it would have made much more sense to have the half interchange southbound-centric whereas Hayden Island along into the Portland would have easy on-and-off access to I-5 and to the rest of Portland. So now if we want to go to Vancouver, we have to go across the arterial bridge over to North Portland, then get on I-5 and go north, so that doesn't make sense to me.

Thank you.

IBR Draft SEIS - RECORD #3065 DETAIL

First Name :	Nicholas
Last Name :	Cunningham
Attachments :	DSEIS-3065_Cunningham_Original.pdf (6 kb)

IBR Draft SEIS - RECORD #3065 DETAIL

Submission Date : 11/18/2024
First Name : Nicholas
Last Name : Cunningham
Business/Organization/Agency :

Submission Input :

First Name:
Nicholas

Last Name:
Cunningham

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Induced Demand

Comment:
Please shrink the I-5 bridge replacement project! It is siphoning off dollars that are needed in so many other areas. And it will only lead to more driving, more air pollution, more greenhouse gas emissions. We can't afford it. Why is Oregon DOT obsessed with dumping billions of dollars into highways instead of redesigning our transportation options to make them safer and cleaner?

JCA comment #: 728

IBR Draft SEIS - RECORD #3066 DETAIL

First Name :	Sabrina
Last Name :	Gogol
Attachments :	DSEIS-3066_Gogol_Original.pdf (6 kb)

IBR Draft SEIS - RECORD #3066 DETAIL

Submission Date : 11/18/2024
First Name : Sabrina
Last Name : Gogol
Business/Organization/Agency :

Submission Input :

First Name:
Sabrina

Last Name:
Gogol

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Air Quality

Comment:
I love my car, especially when it is raining and the MAX won't get me close to where I need to go. I look to ODOT and other government agencies to create long term infrastructure improvements that will help me leave my car at home more so that my short term trips match up with my long term values--and Oregon's long term values-- of cleaner air, walkable streets, and trying to reduce the ongoing catastrophe that is human caused climate change.

JCA comment #: 727

IBR Draft SEIS - RECORD #3067 DETAIL

First Name :	n/a
Last Name :	n/a
Attachments :	DSEIS-3067_none_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #3067 DETAIL

Submission Date : 11/18/2024

First Name : n/a

Last Name : n/a

Business/Organization/Agency :

Submission Input :

The need for a new bridge is obvious. When the original bridge was built it was built for the future. This one should be as well. In needs to have biking and rail lines built into the design. If not our future will pay the price for our shortsight.

IBR Draft SEIS - RECORD #3068 DETAIL

First Name :	Joshua
Last Name :	Landry
Attachments :	DSEIS_Landry2_Original.pdf (20 kb)

JOSHUA LANDRY: Yeah, I just want to leave a quick comment, so I live on Jantzen Beach. My house is going to be affected by this. I will lose my home to make light rail access to people in Washington.

Anyways, so I bought my house in January 5th. On January 8th, a giant barge shows up in front of my house, just obliterating my view, I can't see anything. So I just bought my house, should be the happiest time in my life. Now it's just been destroyed because this giant barge shows up for the IBR, and they were there for 20 days. No one in the Moorage knew about it, they were on the phone for two weeks trying to find out what they were responsible for. I ended up seething, going back across the river to the west side and ended up catching them as they were getting done with the work and asked them. They were geologists.

Anyways, they used their tug as -- that was attending them as their power plant, now it was aimed and sitting about 5 feet away from my back porch. I have water rights to that area. That's part of my home. I ran a tape there and exactly 5 feet. I have pictures of it and everything.

Well, anyways, so that's blowing diesel

exhaust into my house, setting off my fire alarms, carbon monoxide, anyways making my house untenable, which I just bought three days prior. And then, you know, I can't be -- you know, I'm losing my mind because I paid every cash, everything, every dime I own went into this house to buy this house and all of a sudden it's the worst decision I've ever made, worst two weeks of my life because of this, and eventually the Moorage got a hold of them and found out things I'd already found out and the same response was, like, we're just trying to do our job, which is just everyone's trying to say that and getting defensive about it and it's just horrible, horrible.

And eventually, you know, 20 days later they were gone, but no contact, no anything. You know, just a giant wall 5 feet away from my back door pumping poison into my house, and so I couldn't be here for the first 20 days of owning this house, I couldn't be in my own house. The winter storm hit. Those are east winds, so east winds blowing this -- you know, diesel exhaust into my house, and I had ice damage because of it because I wasn't here to take care of it.

So I got an ice dam and I got damage in my

main bedroom. I had to rip the whole floor up because of it. Just one thing begetting another, so.

Anyways, but that's all I wanted to say about that, so that was my first introduction to this was, yeah, three days. So all right. Well, thank you for listening to me and letting me say my bit so I'm going to be done.

IBR Draft SEIS - RECORD #3070 DETAIL

First Name :	Sabrina
Last Name :	Gogol
Attachments :	DSEIS-3070_Gogol_Original.pdf (6 kb)

IBR Draft SEIS - RECORD #3070 DETAIL

Submission Date : 11/18/2024
First Name : Sabrina
Last Name : Gogol
Business/Organization/Agency :

Submission Input :

First Name:
Sabrina

Last Name:
Gogol

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
I am concerned that ODOT is still working towards adding car lanes to the IBR (I-5). Transportation planners have excellent data on how adding lanes actually induces demand. More demand for private car travel is not what our Portland and Vancouver communities need-- we need more public transit, more pedestrian access, and a seismically upgraded bridge that is as cost effective as possible. The extra car lane is not justified by the DSEIS.

JCA comment #: 726

IBR Draft SEIS - RECORD #3071 DETAIL

First Name :	n/a
Last Name :	n/a
Attachments :	DSEIS-3071_none_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #3071 DETAIL

Submission Date : 11/18/2024

First Name : n/a

Last Name : n/a

Business/Organization/Agency :

Submission Input :

Stop spending money we don't have! Lane capacity is too low. What about induced demand? - it is not addressed. Height of bridge damages views and neighborhoods. Clark County does not want light rail. Put cars first. Strip out the DEI nonsense and stick to basics. Already a bloated program.

IBR Draft SEIS - RECORD #3072 DETAIL

First Name :	Whitney
Last Name :	Ruckel
Attachments :	DSEIS-3072_Ruckel_Original.pdf (6 kb)

IBR Draft SEIS - RECORD #3072 DETAIL

Submission Date : 11/18/2024
First Name : Whitney
Last Name : Ruckel
Business/Organization/Agency :

Submission Input :

First Name:
Whitney

Last Name:
Ruckel

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Induced Demand

Comment:
I'm writing to express concerns about the proposed I-5 bridge & lane expansion. I'm concerned that adding more vehicle lanes will create induced demand, and only lead to more vehicles & carbon emissions. I'm concerned about the noise impact of additional lanes, as well as the detrioration of the urban fabric next to the bridge (in both Portland and Vancouver). I applaud the inclusion of the MAX line going to Vancouver. I believe engineers should aim to reduce the environmental impact of the project while helping to preserve the beautiful

neighborhoods in Portland and downtown Vancouver that make these great places to live and great tourist destinations.

JCA comment #: 725

IBR Draft SEIS - RECORD #3073 DETAIL

First Name :	Karl
Last Name :	Freitag
Attachments :	DSEIS-3073_Freitag_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #3073 DETAIL

Submission Date : 11/18/2024
First Name : Karl
Last Name : Freitag
Business/Organization/Agency :

Submission Input :

First Name:
Karl

Last Name:
Freitag

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
I believe that an bridge upgrade must focus on integrating non-vehicular (car) traffic. Active transportation and public transit should be able to seamlessly use the new bridge so that alternatives to driving become more feasible. In this regard, for true Multi-use infrastructure more vulnerable road users should be insulated from vehicular traffic and various forms of travel (cycling, walking, transit) should be side-by-side integrated, for seamless transfers and ease of use. There should be buffers between multi-use and vehicle lanes to reduce exposure to exhaust, noise, debris, and enhance user safety. Elevated access should be convenient for better connections especially for those who have disabilities or choose to walk or bike. This includes elevators and other forms of path access. Specifically, in Vancouver, the path should extend to Evergreen to prevent the need for using a 100-foot high spiral and in Portland there should be added connections to the popular

Vancouver/Williams corridor in addition to the planned Kenton/Denver Ave!

Transit should consider a future that is less car-dependent and make considerations for future capacity. It should extend into Vancouver to allow for commuters to access Portland and vice-versa. Both light rail and bus connections should be considered for a variety of connections. Stations should be integrated with multi use paths for walk/ride and bike/ride options and should be built to support four-car trains now to align with future downtown transit tunnel upgrades. There should also be plans for 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! At a basis this project should consider induced demand. Enhancing car-traffic use options allows for more car use and dependence. However the same goes for alternative transportation methods: providing multi-use and transit options will allow bridge users to consider alternatives to cars. Traffic modeling must realistically account for induced demand to ensure accurate projections for transit and road use.

Prioritizing a streamlined project should focus on transit enhancements, and active transportation rather than simply expanding the freeway. These considerations would be more beneficial and have benefits for bridge users, environmental impact of traffic and could be a model for the rest of the country as a successfully multi-use integrated interstate expansion!

JCA comment #: 724

IBR Draft SEIS - RECORD #3074 DETAIL

First Name :	Justin
Last Name :	Miller
Attachments :	DSEIS-3074_Miller_Original.pdf (6 kb)

IBR Draft SEIS - RECORD #3074 DETAIL

Submission Date : 11/18/2024
First Name : Justin
Last Name : Miller
Business/Organization/Agency :

Submission Input :

First Name:
Justin

Last Name:
Miller

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
I live in the other end of Portland, but always wish to see forward-thinking planning that addresses climate change, iterative improvements for multi-modal transportation (walking, biking, public transit and the interconnection between them all), and avoidance of the proven falsehood that widening roads reduces traffic. We are looking at a century of short-term planning that keeps kicking the can down the road for those in the future instead of thinking and planning and making smart choices.

JCA comment #: 723

IBR Draft SEIS - RECORD #3075 DETAIL

First Name :	AJ
Last Name :	Gomez
Attachments :	DSEIS-3075_Gomez_Original.pdf (5 kb)

IBR Draft SEIS - RECORD #3075 DETAIL

Submission Date : 11/18/2024
First Name : AJ
Last Name : Gomez
Business/Organization/Agency :

Submission Input :

To the IBR:

I write this as a lifelong Vancouver Resident! My business is located at 33rd and Main, a security company.

I am concerned that we have NO PLANS for a third bridge, ever! Not even a local one between Lower River Road and Kelly Point as an example! We will need new bridges, sooner or later. All the energy is use on this project.

The community has voted against tolls and Light rail! These facts seem to be ignored!

Financing! We are printing a Trillion dollars more every 100 days and we can't get 10 billion for the project? NO ONE wants tolls or can afford them! Yet, the project continues nonstop! Work to do it without tolls! Get our longtime Senators behind the fight!

Light rail: Do we really want it? Are YOU gonna take light rail to Portland? 2% of all trips are on mass transit.

I realize that many want Billions of Dollars spent in our backyard. We need a third bridge and improved transportation! Seems like the new bridge is are only band aid and it is not a real solution for the region!

Voter/Taxpayer/Employer/Citizen!

AJ Gomez
[redacted]

IBR Draft SEIS - RECORD #3076 DETAIL

First Name :	Nina
Last Name :	French
Attachments :	DSEIS-3076_French_Original.pdf (6 kb)

IBR Draft SEIS - RECORD #3076 DETAIL

Submission Date : 11/18/2024
First Name : Nina
Last Name : French
Business/Organization/Agency :

Submission Input :

First Name:
Nina

Last Name:
French

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
We do not need more freeways. We need walkable cities with ample public transit. Another freeway will not reduce congestion. Study after study proves that more freeways do not lead to less congestion. I have driven in both Chicago and Seattle. Their freeways do not reduce congestion, they just add MORE congestion. Adding another freeway would just make the city uglier, take valuable land and pollute usable land. There is absolutely NO NEED for another freeway. Let's have a. walkable, livable city that focuses on clean energy, environment, and safety for the wildlife and people.

JCA comment #: 722

IBR Draft SEIS - RECORD #3077 DETAIL

First Name :	Kevin
Last Name :	Machiz
Attachments :	DSEIS-3077_Machiz_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #3077 DETAIL

Submission Date : 11/18/2024
First Name : Kevin
Last Name : Machiz
Business/Organization/Agency :

Submission Input :

First Name:
Kevin

Last Name:
Machiz

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
My name is Kevin Machiz and I'm a resident of [redacted]. I'm disturbed by the information contained in the DSEIS on bicycling and active transportation, as well as on transit. The designs proposed and renderings available show that bicyclists and transit users will be subjected to a level of inconvenience that ultimately will impede the ability of the bridge to attract and satisfy these users. The proposal for an elevated transit stop at such an enormous height will negatively impact reliability and accessibility. Should the project move ahead with

the proposed design, I recommend that the spiral ramp for bicyclists be submitted to the Guinness Book of World Records for longest such ramp on Earth. I'm left with an abiding impression that the design priority here is to maximize the number of automobiles using Interstate 5 regardless of monetary costs or negative impacts to other potential users of the bridge.

JCA comment #: 721

IBR Draft SEIS - RECORD #3078 DETAIL

First Name :	Nancy
Last Name :	Hale
Attachments :	DSEIS-3078_Hale_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #3078 DETAIL

Submission Date : 11/18/2024
First Name : Nancy
Last Name : Hale
Business/Organization/Agency :

Submission Input :

My concerns:

We need light rail across the river. More room for more car/busses does not mitigate heavy vehicle traffic or commute time, and does nothing to lessen vehicle pollution.

Biking/pedestrian lanes are necessary - safe, but separate from traffic. There will need to be easy access to bus/light rail for pedestrians/bikers on each end of the bridge, as well as park&ride.

We need to build for the future: both easy public transportation and positive action to address climate change.

The bridge definitely needs updating for safety, but let’s make it a step towards the future we want, not just a bigger version of what we have.

IBR Draft SEIS - RECORD #3079 DETAIL

First Name :	LISA
Last Name :	Schmidtke Knudsen
Attachments :	DSEIS-3079_Schmidtke Knudson_Original.pdf (5 kb)

IBR Draft SEIS - RECORD #3079 DETAIL

Submission Date : 11/18/2024
First Name : LISA
Last Name : Schmidtke Knudsen
Business/Organization/Agency :

Submission Input :

Hello,
I am an owner of a floating home in the Jantzen Beach Moorage. Our site has been included in the area designated "Temporary Construction Easement" I do not find the definition of this designation to be sufficient. It is obvious that this draft is not taking into consideration that these are family homes. A neighborhood where livability is currently at a premium, which will change drastically dependent on the consideration in planning for the I5 Bridge expansion. I find it hard to believe that we, as a neighborhood of homes, are being given the same consideration as we would were we on land. This became obvious when some of our neighbors experienced direct diesel exhaust during the survey process alone. Questions I'm left with include:
What does Construction Easement mean?
What does temporary mean in this instance?
Will we be displaced to provide space for barges, platforms, stagings?
Will we have access to our homes?
Has there been consideration of current (water current, that is) changes due to the elimination of 2 rows of slips, creating unpredicted erosion to newly vulnerable rows and pilings?

I look forward to further discussion and information as the process continues,

Lisa Schmidtke Knudsen
[redacted]
[redacted]

IBR Draft SEIS - RECORD #3080 DETAIL

First Name :	Ronald
Last Name :	Buel
Attachments :	DSEIS-3080_Buel_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #3080 DETAIL

Submission Date :	11/18/2024
First Name :	Ronald
Last Name :	Buel
Business/Organization/Agency :	Portland Forward

Submission Input :

First Name:
Ronald

Last Name:
Buel

Business or Organization:
Portland Forward

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
Bent Flyvberg and Dan Gardner in their authoritative book How Big Things Get Done, says planners should use

"honest numbers" not "strategic misrepresentation" which are instead being used on the Interstate Bridge Replacement Project. by ODOT and WashDOT. As fuel efficient cars and electric vehicles and work-at-home are reducing gas tax revenues for the two agencies, the agencies are looking at significant lay-offs and reduced budgets. This should be driving the agencies to question "WHY" they are doing projects like the Interstate Bridge Replacement Project, Flyvberg & Gardner say. This project will NOT reduce congestion on I-5, it will simply move the congestion to the un-tolled Glenn Jackson Bridge and I-84, as the investment grade analysis on the earlier CRC project demonstrated factually. This project will NOT insure safety against the Cascadia Induction Fault Earthquake -- four minutes of shaking will endanger the numerous costly ramps that go six stories high through Downtown Vancouver and also across Hayden Island. There is no demonstrated need, either, for the costly six interchange improvements surrounding the bridge, which will cost even more than the bridge itself and damage the area surrounding them as visual barriers, as huge noise producers, and as attractors for vagrants trying to get out of the elements. Induced demand will spur urban sprawl in Clark County and into Cowlitz County. In Oregon, there were 38 forest fires raging in July this year as a result of Climate Change. By inducing more travel via vehicles using gasoline and diesel, this gargantuan freeway expansion will feed much more carbon dioxide into our atmosphere. Freeway expansions DO NOT reduce congestion, contrary to the strategic misrepresentation. Decision-makers should also look at the track record of large projects involving ODOT and WashDOT. They are ALWAYS way over budget and they always take way more time than they are planned to take. The agencies should be looking at high speed rail from Eugene to Vancouver B.C. They should be seriously considering Jim Howell's one-billion-dollar design for a low bridge with a bascule opening alongside the existing bridges to the East. Costs would be much nearer $1 billion for Howell's bridge than for what will surely balloon to over $10 billion for the IBRP. Decision makers asking he question "why" should also take the time to review the work of leading Oregon economist Joe Cortright in City Observatory online. And they should not simply choose the enormously expensive 116 foot high bridge that is currently planned because it may not pass Coast Guard approval this time around, because of its impact on big ship movement on the Columbia. It is important to note as well that carcinogenic air pollution kills 460 persons a year in the Portland Metro area according to the U.S. Environmental Protection Agency and that this freeway will induce vehicle travel that will dramatically increase such air pollution and death. With commuter travel reduced as a result of work-at-home, the question of WHY we are doing this monster bridge does not lead to the conclusion we should do it as planned by the DOTs.

JCA comment #: 720

IBR Draft SEIS - RECORD #3081 DETAIL

First Name :	James
Last Name :	Thompson
Attachments :	DSEIS-3081_Thompson_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #3081 DETAIL

Submission Date : 11/18/2024
First Name : James
Last Name : Thompson
Business/Organization/Agency :

Submission Input :

i'm writing in opposition to the draft SEIS in particular and the construction of a new I5 Columbia river crossing ingeneral.

First, the planning behind the IBR project is assuming a wildly different set of traffic volumes and modes than our regional transportation and climate plans. The current design is utterly inconsistent with actual needs, and the design is in fact taking us in the opposite direction away from our regional environmental goals.

The current design, which features auxiliary lanes and “safety shoulders,” will increase car traffic capacity, running counter to regional climate goals. Further, widening the bridge would do nothing to improve I-5 congestion and could make it worse. According to alternative analyses, the draft SEIS relies on invalid traffic forecast metrics that grossly exaggerate future traffic growth and fail to account for capacity limitations. In July, the Oregonian reported 15,000 fewer vehicles travel on the I-5 bridge between Portland and Vancouver now than before COVID, and “the rate of growth has slowed to a trickle.” And truck freight traffic across the bridge has gone down significantly in recent years. Critics assert the Metro forecast—which the IBR program is using to craft its traffic models—is incorrect.

The draft SEIS also fails to adequately address the needs of alternative transportation users. For example, the draft SEIS configuration shows a large distance between the bike and pedestrian path and the light rail and bus lines. Critics assert that the two modes should be adjacent, allowing for more ease of access for users to transition from walking/biking to riding transit (or vice versa).

The current design for the multi-use path also lacks connectivity, particularly on the Washington side of the river, where the path ends at the waterfront and forces people walking or rolling to travel more than 100 feet down or up a spiral path. The current design also does not give people traveling southbound on the bridge access to the North Vancouver/Williams corridor, which is a popular bike route for commuting to downtown Portland.

As well, publicly available information about the project is lacking in several important ways. The 'flyover' animated videos lack depictions of the effects of the new bridge at ground level, particularly visual impact studies as viewed from the Hayden Island, Vancouver Waterfront and downtown. Images shown do not capture these critical views.

In conclusion, and most importantly, it is my strong opinion that freeway expansion is an atrocious way to spend public resources in the 21st century. Freeway expansion has never solved traffic congestion, perpetuates existing racist transportation and land use decisions from the last century, fills local neighborhoods with toxic air pollution, and creates surprisingly few family-wage jobs per dollar spent. Furthermore, 40% of Oregon’s carbon emissions come from transportation, and it’s simply impossible to reduce greenhouse gases without fundamentally reshaping our communities to make it easier to travel around the region without an

automobile.

Any accurate SEIS would need to take these factors into account, and in not doing so the current draft SEIS needs to be opposed.

Thank you for your consideration,

james thompson
[redacted]

IBR Draft SEIS - RECORD #3082 DETAIL

First Name :	John
Last Name :	Dailey
Attachments :	DSEIS-3082_Dailey_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #3082 DETAIL

Submission Date : 11/18/2024
First Name : John
Last Name : Dailey
Business/Organization/Agency :

Submission Input :

Good Afternoon,
I believe it is a crime to create a huge scare in downtown Vancouver and Hayden Island and the historic Fort Vancouver property! This is completely unnecessary and can be avoided by building a third bridge west of I-5 as a bypass freeway. This would not only leave the existing footprint of the current I-5 as is and would eliminate the huge disruption and traffic backups that will result from replacing the current I-5 bridge. Once the new third west bypass freeway and bridge are operational work can start on replacing a new beautifully designed cable suspension bridge using the same footprint or less. This would enhance downtown Vancouver and Hayden Island and not infringe on the historic Fort Vancouver property.
Respectfully,
John Dailey

IBR Draft SEIS - RECORD #3083 DETAIL

First Name :	Allan
Last Name :	Huffaker
Attachments :	DSEIS-3083_Huffaker_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #3083 DETAIL

Submission Date :	11/18/2024
First Name :	Allan
Last Name :	Huffaker
Business/Organization/Agency :	

Submission Input :

New Bridge needs to be wider and allow for more truck and auto traffic. Room for more commercial traffic.

IBR Draft SEIS - RECORD #3084 DETAIL

First Name :	Shelan
Last Name :	Stritzke
Attachments :	DSEIS-3084_Stritzke_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #3084 DETAIL

Submission Date : 11/18/2024

First Name : Shelan

Last Name : Stritzke

Business/Organization/Agency :

Submission Input :

Has IBR contacted Amtrak and considered the train as an alternate mode of transportation to support commuters during and after bridge construction? Amtrak is currently underutilized and yet it provides a safe, clean, and efficient mode of transportation that isn't affected by interstate traffic. Current train departures don't support reliable commuting however with minor modification, the existing train route could significantly alleviate traffic stress. Southbound routes from Vancouver to Portland take 26 minutes, Northbound routes from Portland to Vancouver take 16 minutes. The earliest departure time to commute into Portland isn't until 10:11am and evening departure times are limited. It seems that working with existing infrastructure and increasing train departure options could greatly benefit commuters. The Amtrak station in Vancouver is a 15 minute walk from Esther Short Park and could be greatly shortened with new pedestrian infrastructure from the Vancouver Waterfront or 8th street. Union Station is centrally located on the west side of downtown Portland and provides efficient pedestrian, biking, and bus connections to businesses downtown. I encourage IBR to explore options for integrating Amtrak and rail lines into the project.

IBR Draft SEIS - RECORD #3085 DETAIL

First Name :	Tabitha
Last Name :	Reeder
Attachments :	DSEIS-3085_Reeder_Original.pdf (2 kb)

IBR Draft SEIS - RECORD #3085 DETAIL

Submission Date :	11/18/2024
First Name :	Tabitha
Last Name :	Reeder
Business/Organization/Agency :	Private Citizen in the Shumway Neighborhood

Submission Input :

Regarding: in chapter 3, section 3.5-18 of the Supplemental DEIS titled, Table 3.5-12. Overview of Anticipated Effects on Vancouver Neighborhoods.

IBRP staff attended the Shumway Neighborhood Association meeting on Nov. 5th, 2024 and we asked why Shumway was not included in this table? The staff members responded that it was an oversight and that the data aggregated in that table was included in other places in the document. I performed an exhaustive search of Chapter 3 and the only way to "find" the data was to read and interpret a considerable amount of text/data. Extrapolation of the massive amounts of data in the Draft Supplemental EIS to provide easily understandable data, like that in Table 3.5-12 is not the job of the community members. It is the job of the IBPR project team and the Plain Writing Act of 2010 clearly states how documents like this should be composed and it is missing the mark. This document is being presented as a roadmap for community to use to understand the the scope and impact of this massive project on our community. Shumway is the neighborhood with the greatest amount of project related displacement. The fact that the neighborhood was omitted from this critical table is negligent and does not disclose the impacts to Shumway. The Shumway Neighborhood should at the very least be given equal evaluation as other neighborhoods, especially because Shumway is one of the more impacted. The State Environmental Policy Act and the National Environmental Policy Act require that all impacts be disclosed. The impacts to Shumway are omitted. This clearly introduces a procedural error in the SEIS. I ask that a Supplemental to the SEIS be published clearly identifying and summarizing the impacts to the Shumway neighborhood.

This oversight needs to be corrected a supplemental to the SEIS should be prepared and issued for public comment so stakeholders have access to fully disclosed and accurate information in the document. Thank you.

IBR Draft SEIS - RECORD #3086 DETAIL

First Name :	David
Last Name :	Sawchak
Attachments :	DSEIS-3086_Sawchak_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #3086 DETAIL

Submission Date : 11/18/2024
First Name : David
Last Name : Sawchak
Business/Organization/Agency :

Submission Input :

First Name:
David

Last Name:
Sawchak

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
I live in Portland, and make most of my trips by bike, but the current I-5 crossing is a serious disincentive to cycling. It's too narrow to safely coexist with pedestrian traffic (narrow enough that hitting one's handlebars on the railing and crashing is a very real concern), and too loud to communicate effectively with other path users. Also, simply accessing the northbound on-ramp requires significant out-of-direction travel and several dangerous mode conflicts with auto traffic (for whom it must also be frustrating.) It's hostile enough to potentially dissuade someone who was 'brave' enough to try it once and had a bad experience, or convince people to avoid it in the first place. By contrast, the I-205 crossing is wider and easier to access, but loud enough to cause hearing damage. Coupled with being longer and a significant elevation change, it ends up being even more unpleasant than I-5.

A workable, 'future-proof' design will need to prioritize accessibility and experience for walking/rolling/cycling users, as well as multi-modal users, in order to reduce demand on auto lanes enough that autos, freight, and buses aren't further slowed. That means minimal out-of-direction travel, access which is safe, friendly, and accessible, and a facility itself which feels inviting enough for a beginner to use. If we design with only experienced, able-bodied commuters in mind, we'll never get the mode share we want (and need). If we make people cross an 8-lane highway to get from the light rail to the bike path, people will give up and drive. The barrier to entry has to be LOW, or we'll just end up with more auto traffic that we can ever build out of.

JCA comment #: 719

IBR Draft SEIS - RECORD #3087 DETAIL

First Name :	Marilyn
Last Name :	Costamagna
Attachments :	DSEIS-3087_Costamanga_Original.pdf (11 kb)

IBR Draft SEIS - RECORD #3087 DETAIL

Submission Date : 11/18/2024
First Name : Marilyn
Last Name : Costamagna
Business/Organization/Agency :

Submission Input :

First Name:
Marilyn

Last Name:
Costamagna

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
To: Interstate Bridge Replacement Program

I. Marilyn Costamagna, residing in Medford, OR, totally support the letter, which the Just Crossing Alliance (JCA) submitted on 6 November 2024, as an overview comment on a Draft Supplant EIS re: the IBR project.

Here is a copy of the letter:

The Just Crossing Alliance (JCA) comprises 36 environmental, transportation, land use and environmental justice organizations who are seeking the most equitable and sustainable possible outcomes from the IBR project.

While we appreciate the need for seismic resilience in this important interstate connection and are enthusiastic about the opportunity for transit and active transportation connections, we find that this project is not, as advertised, a bridge replacement but rather a five mile freeway widening.

Many JCA member organizations and allies have submitted detailed comments about various aspects of this project. This letter is intended as an overview summary to tie all of these together in five main themes:

? The need for more credible traffic modeling
? Maximizing the potential of active transportation and transit
? A need for stronger pricing policy and tolling equity
? Health impacts
? Right Sizing the project

The need for more credible traffic modeling

In our view the traffic modeling for this project fails on two major points: the no-build traffic is grossly overestimated and the Modified Locally Preferred Alternative (MLPA) traffic is likely underestimated.

The DSEIS essentially asserts the same demand for person trips in both alternatives and simply reassigns them to different modal and lane configurations.

JCA has commissioned and submitted an independent analysis of IBR traffic modeling by Norman Marshall, president of Smart Mobility, a nationally recognized consultant in the field. The Marshall report makes it clear that the current roadway simply cannot convey the number of auto trips projected in the no-build and also fails to identify bottlenecks south of the project area that will continue to restrict mobility in the corridor.

The existing bridge is already at full capacity during peak periods, traffic cannot grow significantly in the no-build. The CRC made this same forecasting error in the no-build and the historical evidence now makes this clear.

In the MLPA case, the modeling fails to clearly account for how availability of additional capacity impacts travel demand - the phenomenon known as induced demand (some may call it latent demand - either label results in more auto trips). The induced demand effect is well understood by everyone except state DOTs and their consultants. We have submitted numerous articles and papers documenting this.

The DSEIS itself does not mention induced demand, and the Transportation Technical report only analyzes “induced development” based on land use plan changes - and concludes that land use plans already anticipate completion of the project.

We appreciate that both the availability of transit and tolling will suppress auto travel demand to some degree. We hoped for a nuanced discussion of how induced demand due to more lanes (including collector-distributor lanes) would interact with pricing, but since induced demand is ignored we place little faith in the DSEIS analysis. We particularly reject the assertion that a second auxiliary lane would reduce greenhouse gas (GHG) emissions by reducing congestion. There is ample evidence that long term growth in traffic is proportional to increases in lane miles. We are also concerned that the two Transportation Commissions are approaching the project of setting toll rates in a manner centered much more around revenue raising than about demand management.

The DSEIS bottom line is relatively little difference in auto Vehicle Miles Traveled (VMT) between the no-build and MLPA alternates. We believe that because of the reasons outlined above, VMT will be substantially greater in the MLPA case.

Since almost all of the analysis of environmental effects (GHG, other emissions, health and safety impacts) flows from VMT levels, we simply don't accept the DSEIS as an accurate assessment. The only path to an accurate assessment of these effects is a new Supplemental EIS with credible modeling.

Maximizing the potential of transit and active transportation

We are happy to see active transportation and high-capacity transit connections established across the Columbia River but believe the connections fall far short of what could or should be achieved. We are submitting a separate vision document with detailed recommendations, but in summary:

? The Light Rail configuration is sufficient for opening day of the bridge, but should be designed to accommodate the volume and frequency of service that will be required when the bottleneck at the Steel Bridge is eventually addressed with a transit tunnel under the Willamette River and downtown Portland, something we hope will occur before the 2045 horizon year of the DSEIS. Specifically, stations in the IBR project area should be dimensioned to support four-car trains.

? Beyond the horizon year we anticipate the need for higher capacity modes of transit (e.g., multi-lane BRT or heavy rail) to accommodate passenger movement demand. We should be considering now as we design the physical structure of the bridge how these might be put in place later in the service life of the structure.

? 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.

? Active transportation connections must be extended deeper into the community on both sides of the river, at least as far as Evergreen in downtown Vancouver and connecting to the popular Vancouver/Williams corridor in Portland.

Need for stronger pricing policy and tolling equity

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.

JCA has followed the work of ODOT's Equity and Mobility Advisory Committee with great interest. We are disappointed that this committee was disbanded but are strongly in support of its recommendation for a 50% toll discount for low-income households. We are alarmed that the tolling scenarios selected for Level 3 analysis do not assume that such a discount is in place at the inception of pre-completion tolling. Applying this discount from day one is essential to the equity of this project!

Health and Equity impacts

We have been told to anticipate that disappointingly the Health Analysis for the project will not be published until the final week of the comment period. From what we have read in the executive summary it seems clear that most of the results are based on what we view as faulty VMT analysis as discussed above, meaning they are not reliable or useful.

Nonetheless it is apparent that the increase in traffic in either alternative will have negative health consequences for all populations.

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.

Right-sizing the project
We believe the SDEIS analysis does not provide justification for a second auxiliary lane.
We also continue to believe that this project would be much more appropriate if it were simply a bridge replacement with transit and active transportation connections, rather than a five mile freeway expansion.

JCA comment #: 718

IBR Draft SEIS - RECORD #3088 DETAIL

First Name :	chris
Last Name :	mccraw
Attachments :	DSEIS-3088_McCraw_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #3088 DETAIL

Submission Date : 11/18/2024
First Name : chris
Last Name : mccraw
Business/Organization/Agency :

Submission Input :

First Name:
chris

Last Name:
mccraw

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
I and another in my household frequently bike over the i5 bridge from Portland to Vancouver. I am excited for improved biking facilties, as well as light rail that extends into vancouver! I read with dismay that the biking facilities will have a 1/2 mile ramp at each end, and that the biking facilities are not even adjacent to the light rail facilities, meaning that for folks who might like to ride-and-bike, the route will be non-intuitive and non-welcoming.

Please consider redesigning those facilities to actually encourage, rather than discouraging, multimodal usage. I am excited for a bridge that prioritizes non-motorized vehicles and is also seismically sound.

JCA comment #: 717

IBR Draft SEIS - RECORD #3089 DETAIL

First Name :	Adrienne
Last Name :	Leverette
Attachments :	DSEIS-3089_Leverette_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #3089 DETAIL

Submission Date : 11/18/2024
First Name : Adrienne
Last Name : Leverette
Business/Organization/Agency :

Submission Input :

First Name:
Adrienne

Last Name:
Leverette

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
Hello, I am writing out of concern for the proposed scope of the Interstate Bridge Replacement project. It's obviously a prudent investment to make the bridge seismically resilient, and to add the light rail extension and improvements for people walking and riding bikes. But there doesn't seem to be a compelling justification for a second auxiliary lane. Many groups have looked closely at the issue, and it seems clear that an updated study is needed to make sure that we don't waste an exorbitant amount of public funds to not solve a congestion

problem when other alternatives should be seriously evaluated. None of us knows what the future holds, but this magnitude of investment demands a more clear-eyed approach that prioritizes the health and safety of local residents and our collective resilience to climate change while using realistic, accurate data to inform the design. It's beyond disappointing that ODOT has allowed the project to get this far based on false traffic projections.

JCA comment #: 716

IBR Draft SEIS - RECORD #3091 DETAIL

First Name :	chris
Last Name :	mccraw
Attachments :	DSEIS-3091_mccraw_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #3091 DETAIL

Submission Date : 11/18/2024
First Name : chris
Last Name : mccraw
Business/Organization/Agency :

Submission Input :

First Name:
chris

Last Name:
mccraw

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Climate Change

Comment:
Hi there,

I live 1/2 mile from I-5 at Rosa Parks, and thus I suffer from the pollution from the highway as I breathe in and around my home. I am proud to live in a city with ambitious climate change prevention goals, and so I am

looking forward to a future in which we have less non-transit, motorized vehicle traffic over this bridge. I see the current design widens the freeway, which will encourage more motorized transit and increase air pollution. I hope your design will change to continue to prioritize the environment - rather than expanding the freeway. Let's rebuild the bridge to be seismically sound and avoid as many drawbridge lifts, add let's transit and improve biking facilities! I want this, rather than inducing more demand for traffic by adding traffic lanes. I look forward to a new bridge that does not rely on the false estimates that were provided to the public about trucking traffic, and that encourages folks not to drive over it more than they already do today, so that the traffic pollution can stop poisoning (or at least not poison more!) the air in my neighborhood.

JCA comment #: 715

IBR Draft SEIS - RECORD #3092 DETAIL

First Name :	Thomas
Last Name :	Johnson
Attachments :	DSEIS-3092_Johnson_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #3092 DETAIL

Submission Date : 11/18/2024
First Name : Thomas
Last Name : Johnson
Business/Organization/Agency :

Submission Input :

First Name:
Thomas

Last Name:
Johnson

Email:
[redacted]

Topic Area:
Transportation

Comment:
I am writing to express my opposition to the Interstate Bridge Replacement Project (IBRP) as currently proposed. While infrastructure improvements are necessary, this project is deeply flawed and raises serious concerns regarding cost, accessibility, environmental impact, and seismic safety.

The staggering estimated cost of $7–12 billion is unjustifiable, especially when the plan fails to address the primary issue of traffic congestion on the I-5 corridor. Such an enormous financial commitment risks diverting critical funding from social programs and other essential infrastructure needs, creating long-term economic strain on the region.

The tolling structure intended to fund the bridge would impose significant financial hardship on residents and commuters who rely on this crossing. These tolls would disproportionately affect working families, creating barriers to mobility and economic opportunity.

Furthermore, the proposed design is functionally and aesthetically problematic. The reduced vertical clearance of 116 feet is inadequate to accommodate larger vessels navigating the Columbia River, which could disrupt commerce and limit opportunities for upstream communities. The height and bulk of the bridge would also detract from the area’s natural and urban beauty.

Seismic resilience is another critical issue. It is unacceptable that the proposed design does not ensure safety in the event of a major earthquake, particularly given the likelihood of a Cascadia Subduction Zone event in the next few decades. The potential for ground liquefaction in this area only exacerbates these safety concerns.

Accessibility features also appear to have been poorly planned. For example, the bike and pedestrian ramp at Delta Park is far too long and steep to be practical for everyday use. Similarly, elevated transit stations on Vancouver and Hayden Island will pose challenges for users, especially during inevitable elevator outages. These design flaws would make the bridge less usable for the communities it is intended to serve.

The extended construction timeline is another troubling aspect. A 15-year build would disrupt the lives of residents and businesses, especially those on Hayden Island and in nearby areas. The impacts on property values, quality of life, and local economies are unacceptable for a project that provides so little benefit in return.

Given these serious issues, I urge decision-makers to halt the current plan and fully explore alternatives. A fresh review process, with ample public input, is essential. One such alternative worth considering is an immersed tunnel design, which has proven successful in other regions and could provide a safer, more sustainable, and more cost-effective solution.

The IBRP, as it stands, represents a missed opportunity to create infrastructure that truly serves our region’s needs. I implore you to reconsider this plan and prioritize options that are equitable, environmentally responsible, and designed with the future in mind.

JCA comment #: 714

IBR Draft SEIS - RECORD #3093 DETAIL

First Name :	Shelan
Last Name :	Stritzke
Attachments :	DSEIS-3093_Stritzke_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #3093 DETAIL

Submission Date : 11/18/2024

First Name : Shelan

Last Name : Stritzke

Business/Organization/Agency :

Submission Input :

On the Vancouver side of the river, what is being planned and programmed to happen under the on ramps and bridge? Numerous cities have this condition, and it often turns into a dead zone, where nefarious things happen, creating an unsafe area that people avoid. This is not what we want for Vancouver's downtown and Waterfront. What does the City and IBR plan to do with this space so it doesn't have a negative impact to Downtown Vancouver?

IBR Draft SEIS - RECORD #3094 DETAIL

First Name :	Kima
Last Name :	Garrison
Attachments :	DSEIS-3094_Garrison_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #3094 DETAIL

Submission Date : 11/18/2024
First Name : Kima
Last Name : Garrison
Business/Organization/Agency :

Submission Input :

First Name:
Kima

Last Name:
Garrison

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
Instead of a new/ expanded I-5 bridge, there should be more public transportation between Portland and Vancouver. There are so many people who live in Vancouver yet work in Portland so just making some public transportation between the two cities would make more sense. Possibly a new(separate) bridge just for public transportation?

JCA comment #: 713

IBR Draft SEIS - RECORD #3096 DETAIL

First Name :	Daniel
Last Name :	Halverson
Attachments :	DSEIS-3096_Halverson_Original.pdf (6 kb)

IBR Draft SEIS - RECORD #3096 DETAIL

Submission Date : 11/18/2024
First Name : Daniel
Last Name : Halverson
Business/Organization/Agency :

Submission Input :

First Name:
Daniel

Last Name:
HALVERSON

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
Why do we feel deceived with all the talk, just build a bridge like you asked.

JCA comment #: 712

IBR Draft SEIS - RECORD #3097 DETAIL

First Name :	Phil
Last Name :	Kulak
Attachments :	DSEIS-3097_Kulak_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #3097 DETAIL

Submission Date :	11/18/2024
First Name :	Phil
Last Name :	Kulak
Business/Organization/Agency :	

Submission Input :

We do not need any more auto lanes miles in our metro area. More roads means more cars, more traffic, more noise, more deaths, more injuries, and more pollution. If you would like to rebuild the bridge, that's fine, but we don't need more car lanes.

IBR Draft SEIS - RECORD #3098 DETAIL

First Name :	Lawson E.
Last Name :	Fite
Attachments :	DSEIS3098_CBC_Original.pdf (335 kb) image001.png (456 bytes) image002.png (5 kb) 2024.11.18.DSEIS Comment Letter-CBC.pdf (330 kb)

Schwabe

November 18, 2024

Lawson E. Fite
Admitted in Oregon, Washington and Montana
D: 503-796-3760
C: 503-568-6694
lfite@schwabe.com

VIA E-MAIL AND CERTIFIED MAIL – RETURN RECEIPT REQUESTED

Interstate Bridge Replacement Program
Attn: Draft SEIS Public Comment
500 Broadway, Suite 200
Vancouver WA 98660
draftseis@interstatebridge.org

RE: Comments of Columbia Business Center on Interstate Bridge Replacement Program ("IBR") Draft Supplemental Environmental Impact Statement ("DSEIS")
Our File No.: 139785-273963

I. Introduction

These comments on the September 20, 2024 Draft Supplemental Environmental Impact Statement are submitted on behalf of Columbia Business Center and its four operating companies, CBC 1, L.L.C., CBC 2, L.L.C., CBC 3, L.L.C., and CBC 4, L.L.C. (collectively "CBC"). As described below, CBC is concerned about substantial deficiencies in the DSEIS that are directly related to CBC's access to the Columbia River for navigation as well as its interests in the waterfront environment. IBR has much work to do to produce a legally adequate Final SEIS.

In particular, IBR needs to fairly and fully evaluate the fixed-span and movable-span alternatives in connection with the Modified LPA.[1] The DSEIS fails to adequately establish the baseline for navigation, fails to take a hard look at effects on navigation, and dismisses the lack of forecast data, all in a manner inconsistent with NEPA.[2] The deficiencies in the DSEIS are consistent with IBR's apparent pre-determination that only a fixed span will be built, flouting NEPA's mandate to evaluate feasible alternatives and to fully evaluate the consequences before taking an action.

II. CBC, Access to Navigation, and the Regional Economy Will Be Substantially and Negatively Impacted By a Lowered Bridge.

CBC is a maritime transportation system stakeholder and is the primary facility upstream (less than one mile) of the Interstate Bridge that has used and relied upon the existing 178′ vertical navigation clearance for over 80 years. Originally built as the Kaiser Shipyard for

[1] Locally Preferred Alternative.
[2] National Environmental Policy Act, 42 U.S.C. §§ 4331–4336e.

construction of Liberty Ships during World War II, the specialized infrastructure for building ships and large steel products remains in place and is used by tenants of CBC to build large components and projects for such industries as wind energy and oil facilities that float under the fully-raised bridge for transport to national and international locations. CBC's annual economic output accounts for approximately 5–6% of Clark County's total economic output on an annual basis, and has served for nearly eight decades as a unique foundation for employment in the Pacific Northwest. According to the Bureau of Economic Analysis, Clark County's share of GDP was approximately $24.5 billion in 2022.[3] This means that CBC's economic impact exceeds *$1.2 billion* annually.

A bridge height of 116 feet, as proposed by the fixed span alternatives, will permanently and negatively impact the economic viability of CBC regarding heavy manufacturing for industries that relate to national security, climate change, energy, critical regional and national infrastructure and transportation of goods. There are no alternative navigation routes available that can provide navigation access to and from CBC for vessels and cargo ships with air draft requirements greater than 116 feet. Thus, the proposed bridge height in the fixed span alternatives effectively eliminates CBC's access to essential navigation. Many of CBC's current and future tenants will have their maritime navigational access significantly limited by the proposed bridge height.

CBC is unique in its operation of a full menu of transportation alternatives including barge, rail, ship and third-party logistics to meet all types and sizes of inbound and outbound demands for movement of products and structures which are too large to truck or move by rail. A bridge height of 116 feet will significantly limit the ability to move products and manufactured structures, negatively impacting the economic value that CBC provides to the United States and a corresponding devaluation of CBC itself. The strategic benefit of a location like this is not limited to specific tenants but to the ability to produce these large products and infrastructure. As the Coast Guard stated in its Preliminary Navigation Clearance Determination, these capabilities have demonstrated importance to national security.[4]

It has always been and will remain the case that the vertical navigation clearance requirements of 178 feet for passage under the Bridge is critical to deliver products and manufactured infrastructure to markets around the world. Such products and infrastructure include or could include in the future:

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[3] U.S. Dep't of Commerce, Bureau of Econ. Analysis, *Gross Domestic Product by County and Metropolitan Area, 2022*, Dec. 7, 2023 dataset, *available at* https://www.bea.gov/data/gdp/gdp-county-metro-and-other-areas.

[4] Letter from B.J. Harris, Chief, Waterways Management Branch, Coast Guard District 13, to Thomas D. Goldstein, IBR Program Oversight Manager, Federal Highway Administration, June 17, 2022, at 3.

- Manufacture and delivery of structures for some of the world's largest oil and gas companies.

- Manufacture and delivery of large-scale wind energy projects. Some of the heavy manufacturing cluster of businesses at CBC are already manufacturing for this industry. Although CBC has the mix of companies necessary to serve the wind energy industry, limiting the height of the Interstate Bridge may well preclude this work to continue because of the inability to transport these oversized structures to their destinations.

- Production of large-scale transportation facilities and infrastructure such as bridges, dams and public transit infrastructure have been fabricated and barged from CBC. Continuing construction of such items would not be possible without the ability to transport the finished products beneath a bridge with sufficient height to do so. Vertical clearance of 116 feet does not meet those criteria.

- Manufacture and delivery of offshore wind energy projects - CBC is the largest facility of its kind with the overall capacity to produce this infrastructure. The combination of water transport access to the entire West Coast for movement of large-scale wind energy infrastructure and projects beneath the current Bridge as well as specialized heavy manufacturing buildings, large outdoor assembly staging areas and its cluster of industry tenants does not exist anywhere on the West Coast other than at CBC. Lowering the bridge height to 116 feet severely limits the value of CBC to this industry and correspondingly devalues CBC as a heavy manufacturing facility to its owner.

- Bulk transportation and container shipping are important future uses for CBC. The ships have air draft on average of 174 feet. Once again, a bridge height of 116 feet will preclude a significant portion of this activity occurring at CBC.

The final decision to be made as to the height of the Bridge will also determine the scope of manufacturing activity and product delivery that will continue at CBC. Without adequate analysis and information, the IBR cannot make an informed decision like NEPA requires. This negatively affects CBC's recognized interests in access to navigation and in the waterfront environment.[5]

[5] To that end, Washington has long recognized the riparian property owner's "special property right" of continued access to its property by the same type of seagoing vessel accessing the property. *N. Pac. R.R. Co. v. S.E. Slade Lumber Co.*, 61 Wash. 195, 198, 112 P. 240 (1910).

Early in the DSEIS, the program describes some of the conditions that have changed since approval of the CRC in 2013.[6] This discussion is incomplete. As the document discloses, the Coast Guard completely revamped its bridge permitting process starting in 2014. It is not a coincidence that this occurred after the expiration of the CRC permit and can only be understood as a rejection of the process that led to that flawed (and likely unlawful) permit. The discussion also fails to acknowledge ongoing loss of unique marine based manufacturing capacity and facilities across the country, changes in on-shoring, pre-fabrication, or new and emerging industries (i.e., wind energy). The DSEIS incorrectly assumes that CBC's capabilities can be broken into parts compatible with a lower bridge.[7] But that assumption fails to recognize the concentrated area for large infrastructure manufacturing at CBC which is not duplicated anywhere along the Columbia River, and likely could not be duplicated due to changes in regulation and land use since the 1940s.

III. The DSEIS Fails to Take a Hard Look at the Effects of the Project on Navigation.

NEPA requires agencies "to take a 'hard look' at the environmental consequences of their actions." *Earth Island Inst. v. U.S. Forest Serv.*, 442 F.3d 1147, 1159 (9th Cir. 2006). This hard look "includes 'considering all foreseeable direct and indirect impacts.'" *Id.* (quoting *Idaho Sporting Cong. v. Rittenhouse*, 305 F.3d 957, 973 (9th Cir. 2002)). A hard look "should involve a discussion of adverse impacts that does not improperly minimize negative side effects." *Earth Is. Inst.*, 442 F.3d at 1159. When reviewing an EIS to determine whether the agency took a hard look, courts will "follow a 'rule of reason' approach, which requires 'a pragmatic judgment'" whether the document's "'form, content and preparation foster both informed decision-making and informed public participation.'" *Id.* The EIS must contain "a reasonably thorough discussion of the significant aspects of the probable environmental consequences." *League of Wilderness Defs.-Blue Mtns. Biodiv. Proj. v. U.S. Forest Serv.*, 689 F.3d 1060, 1075 (9th Cir. 2012).

Under these standards, "general statements about possible effects and some risk do not constitute a hard look absent a justification regarding why more definitive information could not be provided." *Id.* Thus, a qualitative prediction of certain impacts will suffice only if "it explains why precise quantification was unreliable." *Id.* at 1077. An agency cannot "decline to consider evidence relevant to indirect and cumulative impacts simply because it cannot *precisely* identify direct effects." *350 Montana v. Haaland*, 50 F.4th 1254, 1272 (9th Cir. 2022). In sum, an EIS must include a "complete investigation into environmental impacts" and "a frank admission of environmental harms." *Nat'l Audubon Soc'y v. Dep't of Navy*, 422 F.3d 174, 200 (4th Cir. 2005)

[6] DSEIS at 2-60–63, 3.2-1.

[7] DSEIS at 3.4-34.

The DSEIS falls short of these standards. It does not adequately describe either the baseline or the potential effects of the project on navigation. Its analysis is overly narrow and it overlooks important aspects throughout.

A. The Description of Baseline Conditions Is Inaccurate and Inadequate.

NEPA requires that baseline conditions be adequately and accurately described. Without establishing the baseline conditions which exist in the vicinity of a project *before* work begins, "there is simply no way to determine what effect the proposed [action] will have on the environment and, consequently, no way to comply with NEPA." *Half Moon Bay Fishermans' Mktg. Ass'n v. Carlucci,* 857 F.2d 505, 510 (9th Cir. 1988). Thus, the CEQ regulations provide that an EIS "shall succinctly describe the environment of the area(s) to be affected by the alternatives under consideration, including the reasonably foreseeable environmental trends and planned actions in the area(s)." 40 C.F.R. § 1502.15(a).[8] If the baseline description contains "inaccurate information and unsupported assumption[s]," it will "materially impede[] informed decision[-]making and public participation." *Oregon Nat. Desert Ass'n v. Jewell*, 840 F.3d 562, 570 (9th Cir. 2016).

IBR's statement falls short. It mischaracterizes the status of navigation on the Columbia in several ways. First, it inaccurately describes the shallow-draft navigation system on the River. The system has a channel depth of 28 feet between the Interstate Bridge and The Dalles, where the channel is maintained to 17 feet. From The Dalles to Pasco and Lewiston, the channel depth is 14 feet.[9] The Navigation section notes that "[j]ust east of The Dalles is a BNSF Railway Bridge at Celilo Falls with a VNC of 79 feet, which is notably less than the bridge heights under consideration for the IBR program."[10] This statement ignores the three bridges between the Interstate Bridge and Hood River with VNC significantly greater than that proposed by the fixed-span alternatives in the Modified LPA.[11]

Further, the DSEIS states that there is a "decreasing trend of commercial vessels on the Columbia River[,]" citing to the EIS for Columbia River System Operations. The System Operations EIS does not support the statement. Rather, it says that "[s]ince 2000, barge traffic through locks at the CSNS has trended downward, *while vessel traffic remained relatively stable*. This suggests that the number of barges per vessel has declined over the past 18 years."[12] The same document shows that cargo tonnage on the Columbia/Snake system reached its highest to-

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[8] Similar language is found in former 40 C.F.R. § 1502.15 (2019).

[9] U.S. Army Corps of Eng'rs, U.S. Bureau of Rec., & Bonneville Pwr. Admin., *Columbia River System Operations Environmental Impact Statement* ("CRSO EIS") at 3-1107 (2020).

[10] DSEIS at 3.2-3.

[11] *See* DSEIS at 3.2-7.

[12] CRSO EIS at 3-1115 (emphasis added).

date level in 2018, at 67.4 million tons.[13] IBR's attempt to downplay the importance of navigation is inappropriate and inaccurate. It has committed a "material misapprehension of the baseline conditions," which "can lay the groundwork for an arbitrary and capricious decision." *Friends of Back Bay v. U.S. Army Corps of Engineers*, 681 F.3d 581, 588 (4th Cir. 2012).

In June 2022 the Coast Guard issued a Preliminary Navigation Clearance Determination ("PNCD") of 178 feet.[14] The Coast Guard based this conclusion on both its policies and its evaluation of the facts. Coast Guard policy will not approve lowering of vertical clearances when the existing clearance is needed "unless there is a compelling *navigational* reason to do so."[15] In the PNCD, the Coast Guard identified four existing vessels that may need up to 178′ clearance and noted future national security or emergency response needs may necessitate passage of large vessels.[16] It also remarked on the trend of commercial vessels getting larger, identifying two recent visiting vessels with very high vertical clearance needs.[17] The Coast Guard also identified the CBC as having among many maritime attributes its "unique" manufacturing capabilities, which are important to maintain.[18]

The Navigation section of the DSEIS acknowledges none of these facts. It minimizes the need for higher clearance for industrial and dredging vessels and claims that requests for bridge openings declined significantly.[19] It does not explain what trends have been observed in vessels needing more than 116 feet of vertical clearance. It also claims that only eight users would be precluded from use of the river by the fixed span.[20] But focusing on the number of users is misleading, as the products that transit to and from CBC have much higher economic value than, for example, recreational traffic. The DSEIS errs in failing to assess user economic impact.

The DSEIS asserts that "there are no planned new marine-dependent developments upstream of the Interstate Bridge" but it includes no analysis of future effects to existing marine-dependent developments like CBC. As discussed above, effects on existing marine-dependent developments are among the most significant consequences of the IBR Project. An agency cannot comply with NEPA by ignoring effects it finds inconvenient. Rather, NEPA requires discussion and disclosure of all "reasonably foreseeable environmental effects…." 42 U.S.C. §

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[13] *Id.* at 3-1110.

[14] Interstate Bridge Replacement Program, *River Crossing Bridge Clearance Assessment Report – Movable Span Options*, Nov. 2022, at 4; Letter from B.J. Harris, Chief, Waterways Management Branch, Coast Guard District 13, to Thomas D. Goldstein, IBR Program Oversight Manager, Federal Highway Administration, June 17, 2022 ("PNCD Letter").

[15] PNCD Letter at 2 (emphasis added).

[16] *Id.* at 3.

[17] *Id.* at 3–4.

[18] *Id.* at 4.

[19] DSEIS at 3.2-6.

[20] DSEIS at 3.2-12.

4332(2)(C)(i). Effects "include ecological (such as the effects on natural resources and on the components, structures, and functioning of affected ecosystems), aesthetic, historic, cultural, economic, social, or health, … whether direct, indirect, or cumulative." 40 C.F.R. § 1508.1(*i*)(4); former 40 C.F.R. § 1508.8 (2019).

The DSEIS acknowledges "however, the Modified LPA with either the double-deck fixed-span or single-level fixed-span configuration would limit future navigation by introducing a *permanent and complete obstruction* to navigation upstream of the new Columbia River bridges for vessels or cargo loads with vertical clearance requirements greater than 116 feet."[21] The DSEIS does not attempt to quantify or otherwise explore these consequences; instead, it just assumes that its lack of knowledge of future plans is conclusive. This falls far short of a hard look.

B. IBR Does Not Appropriately Address Forecast Data.

Regarding future navigational needs, the DSEIS offers no qualitative or quantitative analysis. It does not attempt to ascertain what future needs might be, despite acknowledging that a fixed span would limit navigational access for the next century. The DSEIS merely states that "[f]uture Maritime Transportation System demands and the associated need for bridge openings for the 100+ year service life of the bridge are difficult to predict because vessel traffic and river-level conditions vary from year to year and economic trends for maritime commerce may change over time."[22] This is woefully inadequate.

NEPA requires that agencies deal rigorously with data gaps and forecasts. "While 'foreseeing the unforeseeable' is not required, an agency must use its best efforts to find out all that it reasonably can." *Barnes v. U.S. Dep't of Transp.*, 655 F.3d 1124, 1136 (9th Cir. 2011) (quoting *City of Davis v. Coleman*, 521 F.2d 661, 676 (9th Cir. 1975)). The statute requires that agencies "ensure the professional integrity, including scientific integrity, of the discussion and analysis in an environmental document." 42 U.S.C. § 4332(2)(D). They must also "make use of reliable data and resources" in carrying out NEPA. 42 U.S.C. § 4332(2)(E). Accordingly, NEPA regulations have multiple requirements for agencies dealing with incomplete information relating to reasonably foreseeable significant effects on the human environment. 40 C.F.R. § 1502.21.[23]

First, an agency must "make clear that such information is lacking." 40 C.F.R. § 1502.21(a). The DSEIS does not clear this threshold—it merely claims that future uses are difficult to predict rather than analyzing existing data sources. Second, if "incomplete information relevant to reasonably foreseeable significant effects is essential to a reasoned choice among alternatives, and the overall costs of obtaining it are not unreasonable, the agency *shall*

[21] DSEIS at 3.2-9 (emphasis added).

[22] DSEIS at 3.2-13; *see also id.* at 3.23-9–10 (discussion of cumulative effects on navigation).

[23] This regulation is substantially identical to the former regulation at 40 C.F.R. § 1502.22 (2019).

include the information in the environmental impact statement." 40 C.F.R. § 1502.21(b) (emphasis added). The DSEIS does not do this either, nor does it acknowledge that understanding future use of the waterway is essential to a reasoned choice among alternatives. Third, the regulation requires a series of findings if "information relevant to reasonably foreseeable significant effects cannot be obtained because the overall costs of obtaining it are unreasonable or the means to obtain it are not known." 40 C.F.R. § 1502.21(c). Nothing in the DSEIS acknowledges or attempts to meet this requirement. In the cumulative effects section, the DSEIS discusses a number of potential future development actions but does not acknowledge the economic potential and unique capabilities of CBC, all of which will lead to reasonably foreseeable marine-dependent growth.

IBR may be hoping to avoid the need to forecast by pursuing mitigation with a limited number of vessel owners or users. That does not excuse the failure to actually identify impacts associated with the action. In a remarkably similar case, a court overturned the Bureau of Land Management's analysis in *Ctr. for Biological Diversity v. U.S. Bureau of Land Mgmt.,* 746 F. Supp. 2d 1055 (N.D. Cal. 2009). There the agency stated that the effect "on public land cultural resources has not been fully determined because information needed to assess effect is incomplete at the present time." *Id.* at 1095. The court found this excuse inadequate because "the onus is on the BLM to inform the public of the impacts of the Plan on cultural resources." *Id.* at 1096. The EIS violated NEPA because it did not "inform the public of the scope and extent of the impacts" of the action. *Id.* The DSEIS here has the same flaw and is likewise violating NEPA.

IBR's sidestep toward mitigation also implies that IBR has already decided to press forward with the fixed span and that the NEPA process is mere window dressing. "Mitigation measures may help alleviate impact after construction, but do not help to evaluate and understand the impact before construction. In a way, reliance on mitigation measures presupposes approval." *N. Plains Res. Council, Inc. v. Surface Transp. Bd.*, 668 F.3d 1067, 1084–85 (9th Cir. 2011) (holding the Surface Transportation Board violated NEPA by failing to gather sufficient baseline data). Moreover, the DSEIS speculates that "[a]ffected fabricators could continue to seek contracts for products that exceed the bridge's vertical clearance but would require securing a downriver satellite site to complete final assembly and could incur higher costs."[24] In effect, this concedes that IBR plans to make CBC unsuitable to offer the unique capability that it does now. The DSEIS must acknowledge and analyze this draconian impact.

The DSEIS fails also in its economic analysis. The Land Use and Economic Activity effects analysis, section 3.4, and supporting technical reports, offer no meaningful information on the effect of the project on the overall economy. This information is essential to a reasoned choice. For example, the environmental impact statement for the replacement of the Woodrow

[24] DSEIS at 3.4-34.

Wilson Bridge in Virgina/Maryland evaluated the economic impact of a lower fixed span. This found that the drawbridge would cost $41–77 million and the estimated economic benefits lost would be $111–178 million, more than two-to-one.[25] That information permitted a reasoned choice to continue with a drawbridge on the Capital Beltway/Interstate 95, one of the busiest crossings in the nation.

Courts have warned that "NEPA review cannot be used 'as a subterfuge designed to rationalize a decision already made.'" *Env't Def. Ctr. v. Bureau of Ocean Energy Mgmt.*, 36 F.4th 850, 882 (9th Cir. 2022) (quoting *Metcalf v. Daley*, 214 F.3d 1135, 1142 (9th Cir. 2000)). But the DSEIS here has so many gaps that it cannot support a reasoned decision for a fixed span. The logical conclusion is that a decision has already been made.

C. The Effects Analysis Is Inaccurate, Too Narrow, and Inconsistent With Coast Guard Policies.

The Coast Guard, by letter dated October 13, 2021, put the IBR, FHWA and FTA on notice that, "we want to ensure the IBR team understands the changes to the USCG bridge permit process since the 2012 Columbia River Crossing (CRC) project and understands a new bridge permit application must be submitted in accordance with the 2016 BPAG."[26] According to the BPAG and the Coast Guard-FHWA Memorandum of Understanding, the project sponsor is to prepare a navigation impact report early in project planning.[27] The BPAG includes clearly defined parameters for the required navigation impact report, many of which directly apply to CBC.[28]

The Coast Guard's revised bridge permit application guide includes an appendix entitled "Waterway Data Requirements."[29] This appendix gives guidance on the types of information needed in a bridge permit application under Section 9 of the Rivers and Harbors Act and/or the General Bridge Act of 1946. The 2014 Memorandum of Understanding between the Coast Guard, FHWA, and the Federal Railroad Administration "requires applicants with Department of Transportation funded projects prepare a navigation impact report in order to analyze the navigational impacts of the bridge design alternatives."[30]

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[25] U.S. Dep't of Transp.-Fed. Hwy. Admin., Virginia Dep't of Transp., Md. St. Hwy. Comm'n, and Dist. of Columbia Dep't of Pub. Works, *Final Environmental Impact Statement/Section 4(f) Evaluation*, Woodrow Wilson Bridge Improvement Study, Sept. 2, 1997, at 2-57–58.

[26] U.S. Coast Guard, *Bridge Permit Application Guide*, COMDTPUB P16591.3D, July 2016 ("BPAG"); https://www.dco.uscg.mil/Portals/9/BPAG_COMDTPUB_P16591-3D_July2016.pdf.

[27] BPAG at 2, App'x A; MOA at 5; MOU at 4.

[28] BPAG at A1-7–12.

[29] BPAG, App'x A.

[30] *Id.* at A1-1.

Even though the BPAG navigational impact report criteria clearly apply to CBC, CBC was not contacted as an interested or affected party as a shipyard, marine facility, upstream commercial activity generator, critical infrastructure, key resource, or an important/unique U.S. industrial capacity facility as part of either the 2012 or 2021 NIR outreach. CBC made a request to IBR to be included in its NIR community outreach in a letter dated February 2, 2022 to no avail.

The Navigation section of the DSEIS is simply a repeat of the NIR. The NIR is inaccurate, incomplete, and wholly insufficient as it relates to CBC. To provide a few examples:

- CBC was not evaluated in the NIR under all of the categories which would apply thereto, such as a marine facility. Terminals, berths, barge slips, docks, etc. were all listed (36 of them within three miles), but the barge slips at CBC were not referenced.

- IBR's impacts to existing commercial/industrial development were not addressed, and future use at CBC was speculated to be redeveloped with mixed use (residential, commercial and retail uses) with no reference to a source. CBC has no current plans to redevelop the site. With zoning as industrial and with special exception in Vancouver's zoning code allowing even a broader set of heavy industrial uses, redevelopment as mixed-use would not be permissible. In addition, there are covenants recorded against the property which specifically prohibit residential development on the property.

- There is no discussion as required by the BPAG of CBC's unique U.S. industrial capacity. Why do these users exist in a cluster at CBC? Because CBC is one of the only industrial sites on the West Coast with heavy industrial manufacturing capabilities that is close to the Pacific Ocean for transporting goods to deployment sites.

- The DSEIS contains no discussion of development opportunities at CBC or its future viability for marine related industry (i.e. wind energy) even though there are nearly 50 acres of undeveloped, industrially zoned property (currently being used as outside storage, laydown or outdoor assembly space) within this marine dependent, one-of-a-kind manufacturing facility. Circumstances have changed since the NIR's conclusory analysis on off-shore wind development in 2012. CRC's analysis of impacts to CBC amounted to a simple conclusion that parts for off-shore wind development could be produced in other locations and in new facilities created for that purpose. The 2012 analysis ignored impacts associated with developing new industrial manufacturing facilities. Twelve years ago, off-shore wind was a speculative enterprise. Now, the Bureau of Ocean Energy

Management ("BOEM") intends to lease two areas off-shore of Oregon for off-shore wind development. As a New York Times article noted in December 2023, off-shore wind projects in the United States are expensive because the country lacks a robust domestic supply chain. "[M]anufacturers cannot justify building large factories if they don't know whether there will be enough demand."[31] It is no longer reasonable to assume without support that off-shore wind turbines can and will be built anywhere along the West Coast.

- Although mitigation for impacts to revenue and potential relocation costs incurred by tenants at CBC was referenced in the 2022 NIR, no mitigation was proposed for impacts on CBC induced by an impairment to the Columbia River Maritime system by the proposed LPA. The DSEIS therefore does not meet the requirements of Section S of BPAG Appendix A.

To further illustrate the inadequacy of the NIR process and resulting work product one only need review the USCG process and associated directives, CBC was contacted as part of the U.S. Coast Guard's Navigation Only Public Notice and provided comments. The USCG subsequently issued the PNCD, which referenced CBC twenty-two times in its delineation of the factors that informed the USCG's conclusion on vertical clearance. All these references supported the PNCD's conclusion that the Locally Preferred Alternative's (LPA) VNC of 116 feet is not approvable, and that any proposed new bridge would need to meet or exceed the existing VNC of the current I-5 twin bridges of 178 feet. This shows that the NIR that was submitted to the USCG was incomplete and insufficient.

The NIR and the Navigation discussion are also inconsistent with Coast Guard procedures. This reveals serious gaps in the effects analysis.

In the BPAG, Section G of Appendix A directs an applicant to include a description of "the present and … prospective commercial navigation and the cargoes moved on the waterway".[32] It asks whether "the proposed bridge(s) [will] affect the safe, efficient movement of any segment of the present or prospective commercial fleet operating on the waterway?" In answering that question, the applicant is directed to provide vessel-specific details. In the same section, the applicant is asked whether the proposal will "impact existing and future cruise ship ports-of-call/terminals" or if "the proposed bridge(s) clearance [will] impact *present and/or prospective* upstream commercial activity, e.g., jobs and economic growth and development". If the answer to the latter question is yes, the applicant must address "any existing or planned commercial/industrial developments negatively affected by the proposed clearances and discuss

[31] Ivan Penn et al., "What Ails Offshore Wind: Supply Chains, Ships and Interest Rates," *N.Y. Times*, Dec. 11, 2023; https://www.nytimes.com/2023/12/11/business/energy-environment/offshore-wind-energy-east-coast.html.
[32] BPAG at A1-7.

the economic impacts the proposed clearances will have on these businesses."[33] The applicant must also "[p]rovide input from waterway depend[e]nt facilities concerning future use;" describe "land use zoning along the waterway (particularly within the riparian zone);" and "Include input from facilities based on business plans." Section G concludes by seeking "any additional information concerning the potentially impacted or burdened users of the waterway as well as the future use of the waterway."[34] Section I asks whether the bridge will block access to any local service providers and whether those providers are "considered critical infrastructure, key resources, or important/unique U.S. industrial capability (i.e., are these facilities unique or one of only a few of the type in the area?)" The applicant must "[a]ddress whether the proposed clearances negatively affect those facilities and their customers."[35]

By the structure of these questions, it is clear that the Coast Guard considers "users of the waterway" to include any commercial activity that is affected by the clearance of a proposed bridge. Thus, IBR has taken a restrictive view of waterway users and its effects analysis that falls short of applicable requirements.

The Program's identification of reasonably foreseeable actions and effects is too narrow. The DSEIS focuses on "the area where most physical changes associated with the Program would occur."[36] This does not adequately account for the full scope of effects from the project. As in *Preserve Our Island v. U.S. Army Corps of Engineers*, this "narrow geographic focus and limitation on future events to be considered undercut the scope and effect of the cumulative effects analysis." No. C08-1353RSM, 2009 WL 2511953, at *17 (W.D. Wash. Aug. 13, 2009). The effects analysis should be expanded to fully consider all types of impact, not just the physical footprint of the bridge and highway.

D. The Movable-Span Option Is Not Appropriately Designed or Sufficiently Considered.

Although the DSEIS includes a movable-span option at the insistence of the Coast Guard, IBR's treatment of that option is questionable. There is not nearly the level of detail regarding the movable span as compared to the fixed span. This is inconsistent with FHWA regulations at 23 C.F.R. § 771.123, which instruct that while one alternative may be developed in more detail than others, "[t]he development of such higher level of detail must not prevent the lead agency from making an impartial decision as to whether to accept another alternative that is being considered in the environmental review process."[37] The DSEIS does not explain why the movable-span would have a minimum height of 92 feet when closed—compared to lower

[33] *Id.* at A1-8.
[34] *Id.*
[35] *Id.* at A1-9.
[36] DSEIS at 3.23-4.
[37] As of 2005, when CRC scoping began, this language was at 23 U.S.C. § 139(f)(4)(D).

heights, this would seem to dramatically increase cost.[38] The project should consider varying heights that would optimize both cost and navigation, rather than designing the most expensive alternative to make a movable span seem less viable.

E. IBR Has Not Taken the Required Hard Look at Effects on the Transportation System.

The transportation analysis and assumptions about traffic needs fail to analyze induced transportation demand from the construction of the project. For over a decade, it has been clear that "agencies must analyze the impacts of the increased demand attributable to the additional [transportation infrastructure] as growth-inducing effects falling under the purview of 40 C.F.R. § 1508.8(b)."[39] *Barnes v. U.S. Dep't of Transp.*, 655 F.3d 1124, 1139 (9th Cir. 2011). The DSEIS does not do this.

The transportation section does not mention induced demand at all. DSEIS section 3.1. The transportation technical report claims that "[t]he Modified LPA is designed to support the level and character of growth that is already anticipated in these growth planning efforts, and therefore there would be a low potential for additional indirect effects or induced demand…." Transp. Tech. Rept. at 6-1. This entirely fails to consider a key aspect of the problem or even to acknowledge its existence. Again, the large data gaps raise the specter of decision before analysis, the opposite of what NEPA requires.

IV. Conclusion

Thank you for considering these comments. Please contact the undersigned if you have any questions.

Very truly yours,

SCHWABE, WILLIAMSON & WYATT, P.C.



Lawson E. Fite

LEF:cw

[38] *See* DSEIS at 2-30.

[39] Substantially identical language is in the present NEPA regulations at 40 C.F.R. § 1508.1(*i*)(2).

Schwabe

November 18, 2024

Lawson E. Fite
Admitted in Oregon, Washington and Montana
D: 503-796-3760
C: 503-568-6694
lfite@schwabe.com

VIA E-MAIL AND CERTIFIED MAIL – RETURN RECEIPT REQUESTED

Interstate Bridge Replacement Program
Attn: Draft SEIS Public Comment
500 Broadway, Suite 200
Vancouver WA 98660
draftseis@interstatebridge.org

RE: Comments of Columbia Business Center on Interstate Bridge Replacement Program ("IBR") Draft Supplemental Environmental Impact Statement ("DSEIS")
Our File No.: 139785-273963

I. Introduction

These comments on the September 20, 2024 Draft Supplemental Environmental Impact Statement are submitted on behalf of Columbia Business Center and its four operating companies, CBC 1, L.L.C., CBC 2, L.L.C., CBC 3, L.L.C., and CBC 4, L.L.C. (collectively "CBC"). As described below, CBC is concerned about substantial deficiencies in the DSEIS that are directly related to CBC's access to the Columbia River for navigation as well as its interests in the waterfront environment. IBR has much work to do to produce a legally adequate Final SEIS.

In particular, IBR needs to fairly and fully evaluate the fixed-span and movable-span alternatives in connection with the Modified LPA.[1] The DSEIS fails to adequately establish the baseline for navigation, fails to take a hard look at effects on navigation, and dismisses the lack of forecast data, all in a manner inconsistent with NEPA.[2] The deficiencies in the DSEIS are consistent with IBR's apparent pre-determination that only a fixed span will be built, flouting NEPA's mandate to evaluate feasible alternatives and to fully evaluate the consequences before taking an action.

II. CBC, Access to Navigation, and the Regional Economy Will Be Substantially and Negatively Impacted By a Lowered Bridge.

CBC is a maritime transportation system stakeholder and is the primary facility upstream (less than one mile) of the Interstate Bridge that has used and relied upon the existing 178′ vertical navigation clearance for over 80 years. Originally built as the Kaiser Shipyard for

[1] Locally Preferred Alternative.
[2] National Environmental Policy Act, 42 U.S.C. §§ 4331–4336e.

construction of Liberty Ships during World War II, the specialized infrastructure for building ships and large steel products remains in place and is used by tenants of CBC to build large components and projects for such industries as wind energy and oil facilities that float under the fully-raised bridge for transport to national and international locations. CBC's annual economic output accounts for approximately 5–6% of Clark County's total economic output on an annual basis, and has served for nearly eight decades as a unique foundation for employment in the Pacific Northwest. According to the Bureau of Economic Analysis, Clark County's share of GDP was approximately $24.5 billion in 2022.[3] This means that CBC's economic impact exceeds *$1.2 billion* annually.

A bridge height of 116 feet, as proposed by the fixed span alternatives, will permanently and negatively impact the economic viability of CBC regarding heavy manufacturing for industries that relate to national security, climate change, energy, critical regional and national infrastructure and transportation of goods. There are no alternative navigation routes available that can provide navigation access to and from CBC for vessels and cargo ships with air draft requirements greater than 116 feet. Thus, the proposed bridge height in the fixed span alternatives effectively eliminates CBC's access to essential navigation. Many of CBC's current and future tenants will have their maritime navigational access significantly limited by the proposed bridge height.

CBC is unique in its operation of a full menu of transportation alternatives including barge, rail, ship and third-party logistics to meet all types and sizes of inbound and outbound demands for movement of products and structures which are too large to truck or move by rail. A bridge height of 116 feet will significantly limit the ability to move products and manufactured structures, negatively impacting the economic value that CBC provides to the United States and a corresponding devaluation of CBC itself. The strategic benefit of a location like this is not limited to specific tenants but to the ability to produce these large products and infrastructure. As the Coast Guard stated in its Preliminary Navigation Clearance Determination, these capabilities have demonstrated importance to national security.[4]

It has always been and will remain the case that the vertical navigation clearance requirements of 178 feet for passage under the Bridge is critical to deliver products and manufactured infrastructure to markets around the world. Such products and infrastructure include or could include in the future:

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[3] U.S. Dep't of Commerce, Bureau of Econ. Analysis, *Gross Domestic Product by County and Metropolitan Area, 2022*, Dec. 7, 2023 dataset, *available at* https://www.bea.gov/data/gdp/gdp-county-metro-and-other-areas.

[4] Letter from B.J. Harris, Chief, Waterways Management Branch, Coast Guard District 13, to Thomas D. Goldstein, IBR Program Oversight Manager, Federal Highway Administration, June 17, 2022, at 3.

- Manufacture and delivery of structures for some of the world's largest oil and gas companies.

- Manufacture and delivery of large-scale wind energy projects. Some of the heavy manufacturing cluster of businesses at CBC are already manufacturing for this industry. Although CBC has the mix of companies necessary to serve the wind energy industry, limiting the height of the Interstate Bridge may well preclude this work to continue because of the inability to transport these oversized structures to their destinations.

- Production of large-scale transportation facilities and infrastructure such as bridges, dams and public transit infrastructure have been fabricated and barged from CBC. Continuing construction of such items would not be possible without the ability to transport the finished products beneath a bridge with sufficient height to do so. Vertical clearance of 116 feet does not meet those criteria.

- Manufacture and delivery of offshore wind energy projects - CBC is the largest facility of its kind with the overall capacity to produce this infrastructure. The combination of water transport access to the entire West Coast for movement of large-scale wind energy infrastructure and projects beneath the current Bridge as well as specialized heavy manufacturing buildings, large outdoor assembly staging areas and its cluster of industry tenants does not exist anywhere on the West Coast other than at CBC. Lowering the bridge height to 116 feet severely limits the value of CBC to this industry and correspondingly devalues CBC as a heavy manufacturing facility to its owner.

- Bulk transportation and container shipping are important future uses for CBC. The ships have air draft on average of 174 feet. Once again, a bridge height of 116 feet will preclude a significant portion of this activity occurring at CBC.

The final decision to be made as to the height of the Bridge will also determine the scope of manufacturing activity and product delivery that will continue at CBC. Without adequate analysis and information, the IBR cannot make an informed decision like NEPA requires. This negatively affects CBC's recognized interests in access to navigation and in the waterfront environment.[5]

[5] To that end, Washington has long recognized the riparian property owner's "special property right" of continued access to its property by the same type of seagoing vessel accessing the property. *N. Pac. R.R. Co. v. S.E. Slade Lumber Co.*, 61 Wash. 195, 198, 112 P. 240 (1910).

Early in the DSEIS, the program describes some of the conditions that have changed since approval of the CRC in 2013.[6] This discussion is incomplete. As the document discloses, the Coast Guard completely revamped its bridge permitting process starting in 2014. It is not a coincidence that this occurred after the expiration of the CRC permit and can only be understood as a rejection of the process that led to that flawed (and likely unlawful) permit. The discussion also fails to acknowledge ongoing loss of unique marine based manufacturing capacity and facilities across the country, changes in on-shoring, pre-fabrication, or new and emerging industries (i.e., wind energy). The DSEIS incorrectly assumes that CBC's capabilities can be broken into parts compatible with a lower bridge.[7] But that assumption fails to recognize the concentrated area for large infrastructure manufacturing at CBC which is not duplicated anywhere along the Columbia River, and likely could not be duplicated due to changes in regulation and land use since the 1940s.

III. The DSEIS Fails to Take a Hard Look at the Effects of the Project on Navigation.

NEPA requires agencies "to take a 'hard look' at the environmental consequences of their actions." *Earth Island Inst. v. U.S. Forest Serv.*, 442 F.3d 1147, 1159 (9th Cir. 2006). This hard look "includes 'considering all foreseeable direct and indirect impacts.'" *Id.* (quoting *Idaho Sporting Cong. v. Rittenhouse*, 305 F.3d 957, 973 (9th Cir. 2002)). A hard look "should involve a discussion of adverse impacts that does not improperly minimize negative side effects." *Earth Is. Inst.*, 442 F.3d at 1159. When reviewing an EIS to determine whether the agency took a hard look, courts will "follow a 'rule of reason' approach, which requires 'a pragmatic judgment'" whether the document's "'form, content and preparation foster both informed decision-making and informed public participation.'" *Id.* The EIS must contain "a reasonably thorough discussion of the significant aspects of the probable environmental consequences." *League of Wilderness Defs.-Blue Mtns. Biodiv. Proj. v. U.S. Forest Serv.*, 689 F.3d 1060, 1075 (9th Cir. 2012).

Under these standards, "general statements about possible effects and some risk do not constitute a hard look absent a justification regarding why more definitive information could not be provided." *Id.* Thus, a qualitative prediction of certain impacts will suffice only if "it explains why precise quantification was unreliable." *Id.* at 1077. An agency cannot "decline to consider evidence relevant to indirect and cumulative impacts simply because it cannot *precisely* identify direct effects." *350 Montana v. Haaland*, 50 F.4th 1254, 1272 (9th Cir. 2022). In sum, an EIS must include a "complete investigation into environmental impacts" and "a frank admission of environmental harms." *Nat'l Audubon Soc'y v. Dep't of Navy*, 422 F.3d 174, 200 (4th Cir. 2005)

[6] DSEIS at 2-60–63, 3.2-1.

[7] DSEIS at 3.4-34.

The DSEIS falls short of these standards. It does not adequately describe either the baseline or the potential effects of the project on navigation. Its analysis is overly narrow and it overlooks important aspects throughout.

A. The Description of Baseline Conditions Is Inaccurate and Inadequate.

NEPA requires that baseline conditions be adequately and accurately described. Without establishing the baseline conditions which exist in the vicinity of a project *before* work begins, "there is simply no way to determine what effect the proposed [action] will have on the environment and, consequently, no way to comply with NEPA." *Half Moon Bay Fishermans' Mktg. Ass'n v. Carlucci,* 857 F.2d 505, 510 (9th Cir. 1988). Thus, the CEQ regulations provide that an EIS "shall succinctly describe the environment of the area(s) to be affected by the alternatives under consideration, including the reasonably foreseeable environmental trends and planned actions in the area(s)." 40 C.F.R. § 1502.15(a).[8] If the baseline description contains "inaccurate information and unsupported assumption[s]," it will "materially impede[] informed decision[-]making and public participation." *Oregon Nat. Desert Ass'n v. Jewell*, 840 F.3d 562, 570 (9th Cir. 2016).

IBR's statement falls short. It mischaracterizes the status of navigation on the Columbia in several ways. First, it inaccurately describes the shallow-draft navigation system on the River. The system has a channel depth of 28 feet between the Interstate Bridge and The Dalles, where the channel is maintained to 17 feet. From The Dalles to Pasco and Lewiston, the channel depth is 14 feet.[9] The Navigation section notes that "[j]ust east of The Dalles is a BNSF Railway Bridge at Celilo Falls with a VNC of 79 feet, which is notably less than the bridge heights under consideration for the IBR program."[10] This statement ignores the three bridges between the Interstate Bridge and Hood River with VNC significantly greater than that proposed by the fixed-span alternatives in the Modified LPA.[11]

Further, the DSEIS states that there is a "decreasing trend of commercial vessels on the Columbia River[,]" citing to the EIS for Columbia River System Operations. The System Operations EIS does not support the statement. Rather, it says that "[s]ince 2000, barge traffic through locks at the CSNS has trended downward, *while vessel traffic remained relatively stable*. This suggests that the number of barges per vessel has declined over the past 18 years."[12] The same document shows that cargo tonnage on the Columbia/Snake system reached its highest to-

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[8] Similar language is found in former 40 C.F.R. § 1502.15 (2019).

[9] U.S. Army Corps of Eng'rs, U.S. Bureau of Rec., & Bonneville Pwr. Admin., *Columbia River System Operations Environmental Impact Statement* ("CRSO EIS") at 3-1107 (2020).

[10] DSEIS at 3.2-3.

[11] *See* DSEIS at 3.2-7.

[12] CRSO EIS at 3-1115 (emphasis added).

date level in 2018, at 67.4 million tons.[13] IBR's attempt to downplay the importance of navigation is inappropriate and inaccurate. It has committed a "material misapprehension of the baseline conditions," which "can lay the groundwork for an arbitrary and capricious decision." *Friends of Back Bay v. U.S. Army Corps of Engineers*, 681 F.3d 581, 588 (4th Cir. 2012).

In June 2022 the Coast Guard issued a Preliminary Navigation Clearance Determination ("PNCD") of 178 feet.[14] The Coast Guard based this conclusion on both its policies and its evaluation of the facts. Coast Guard policy will not approve lowering of vertical clearances when the existing clearance is needed "unless there is a compelling *navigational* reason to do so."[15] In the PNCD, the Coast Guard identified four existing vessels that may need up to 178′ clearance and noted future national security or emergency response needs may necessitate passage of large vessels.[16] It also remarked on the trend of commercial vessels getting larger, identifying two recent visiting vessels with very high vertical clearance needs.[17] The Coast Guard also identified the CBC as having among many maritime attributes its "unique" manufacturing capabilities, which are important to maintain.[18]

The Navigation section of the DSEIS acknowledges none of these facts. It minimizes the need for higher clearance for industrial and dredging vessels and claims that requests for bridge openings declined significantly.[19] It does not explain what trends have been observed in vessels needing more than 116 feet of vertical clearance. It also claims that only eight users would be precluded from use of the river by the fixed span.[20] But focusing on the number of users is misleading, as the products that transit to and from CBC have much higher economic value than, for example, recreational traffic. The DSEIS errs in failing to assess user economic impact.

The DSEIS asserts that "there are no planned new marine-dependent developments upstream of the Interstate Bridge" but it includes no analysis of future effects to existing marine-dependent developments like CBC. As discussed above, effects on existing marine-dependent developments are among the most significant consequences of the IBR Project. An agency cannot comply with NEPA by ignoring effects it finds inconvenient. Rather, NEPA requires discussion and disclosure of all "reasonably foreseeable environmental effects…." 42 U.S.C. §

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[13] *Id.* at 3-1110.

[14] Interstate Bridge Replacement Program, *River Crossing Bridge Clearance Assessment Report – Movable Span Options*, Nov. 2022, at 4; Letter from B.J. Harris, Chief, Waterways Management Branch, Coast Guard District 13, to Thomas D. Goldstein, IBR Program Oversight Manager, Federal Highway Administration, June 17, 2022 ("PNCD Letter").

[15] PNCD Letter at 2 (emphasis added).

[16] *Id.* at 3.

[17] *Id.* at 3–4.

[18] *Id.* at 4.

[19] DSEIS at 3.2-6.

[20] DSEIS at 3.2-12.

4332(2)(C)(i). Effects "include ecological (such as the effects on natural resources and on the components, structures, and functioning of affected ecosystems), aesthetic, historic, cultural, economic, social, or health, … whether direct, indirect, or cumulative." 40 C.F.R. § 1508.1(*i*)(4); former 40 C.F.R. § 1508.8 (2019).

The DSEIS acknowledges "however, the Modified LPA with either the double-deck fixed-span or single-level fixed-span configuration would limit future navigation by introducing a *permanent and complete obstruction* to navigation upstream of the new Columbia River bridges for vessels or cargo loads with vertical clearance requirements greater than 116 feet."[21] The DSEIS does not attempt to quantify or otherwise explore these consequences; instead, it just assumes that its lack of knowledge of future plans is conclusive. This falls far short of a hard look.

B. IBR Does Not Appropriately Address Forecast Data.

Regarding future navigational needs, the DSEIS offers no qualitative or quantitative analysis. It does not attempt to ascertain what future needs might be, despite acknowledging that a fixed span would limit navigational access for the next century. The DSEIS merely states that "[f]uture Maritime Transportation System demands and the associated need for bridge openings for the 100+ year service life of the bridge are difficult to predict because vessel traffic and river-level conditions vary from year to year and economic trends for maritime commerce may change over time."[22] This is woefully inadequate.

NEPA requires that agencies deal rigorously with data gaps and forecasts. "While 'foreseeing the unforeseeable' is not required, an agency must use its best efforts to find out all that it reasonably can." *Barnes v. U.S. Dep't of Transp.*, 655 F.3d 1124, 1136 (9th Cir. 2011) (quoting *City of Davis v. Coleman*, 521 F.2d 661, 676 (9th Cir. 1975)). The statute requires that agencies "ensure the professional integrity, including scientific integrity, of the discussion and analysis in an environmental document." 42 U.S.C. § 4332(2)(D). They must also "make use of reliable data and resources" in carrying out NEPA. 42 U.S.C. § 4332(2)(E). Accordingly, NEPA regulations have multiple requirements for agencies dealing with incomplete information relating to reasonably foreseeable significant effects on the human environment. 40 C.F.R. § 1502.21.[23]

First, an agency must "make clear that such information is lacking." 40 C.F.R. § 1502.21(a). The DSEIS does not clear this threshold—it merely claims that future uses are difficult to predict rather than analyzing existing data sources. Second, if "incomplete information relevant to reasonably foreseeable significant effects is essential to a reasoned choice among alternatives, and the overall costs of obtaining it are not unreasonable, the agency *shall*

[21] DSEIS at 3.2-9 (emphasis added).

[22] DSEIS at 3.2-13; *see also id.* at 3.23-9–10 (discussion of cumulative effects on navigation).

[23] This regulation is substantially identical to the former regulation at 40 C.F.R. § 1502.22 (2019).

include the information in the environmental impact statement." 40 C.F.R. § 1502.21(b) (emphasis added). The DSEIS does not do this either, nor does it acknowledge that understanding future use of the waterway is essential to a reasoned choice among alternatives. Third, the regulation requires a series of findings if "information relevant to reasonably foreseeable significant effects cannot be obtained because the overall costs of obtaining it are unreasonable or the means to obtain it are not known." 40 C.F.R. § 1502.21(c). Nothing in the DSEIS acknowledges or attempts to meet this requirement. In the cumulative effects section, the DSEIS discusses a number of potential future development actions but does not acknowledge the economic potential and unique capabilities of CBC, all of which will lead to reasonably foreseeable marine-dependent growth.

IBR may be hoping to avoid the need to forecast by pursuing mitigation with a limited number of vessel owners or users. That does not excuse the failure to actually identify impacts associated with the action. In a remarkably similar case, a court overturned the Bureau of Land Management's analysis in *Ctr. for Biological Diversity v. U.S. Bureau of Land Mgmt.,* 746 F. Supp. 2d 1055 (N.D. Cal. 2009). There the agency stated that the effect "on public land cultural resources has not been fully determined because information needed to assess effect is incomplete at the present time." *Id.* at 1095. The court found this excuse inadequate because "the onus is on the BLM to inform the public of the impacts of the Plan on cultural resources." *Id.* at 1096. The EIS violated NEPA because it did not "inform the public of the scope and extent of the impacts" of the action. *Id.* The DSEIS here has the same flaw and is likewise violating NEPA.

IBR's sidestep toward mitigation also implies that IBR has already decided to press forward with the fixed span and that the NEPA process is mere window dressing. "Mitigation measures may help alleviate impact after construction, but do not help to evaluate and understand the impact before construction. In a way, reliance on mitigation measures presupposes approval." *N. Plains Res. Council, Inc. v. Surface Transp. Bd.*, 668 F.3d 1067, 1084–85 (9th Cir. 2011) (holding the Surface Transportation Board violated NEPA by failing to gather sufficient baseline data). Moreover, the DSEIS speculates that "[a]ffected fabricators could continue to seek contracts for products that exceed the bridge's vertical clearance but would require securing a downriver satellite site to complete final assembly and could incur higher costs."[24] In effect, this concedes that IBR plans to make CBC unsuitable to offer the unique capability that it does now. The DSEIS must acknowledge and analyze this draconian impact.

The DSEIS fails also in its economic analysis. The Land Use and Economic Activity effects analysis, section 3.4, and supporting technical reports, offer no meaningful information on the effect of the project on the overall economy. This information is essential to a reasoned choice. For example, the environmental impact statement for the replacement of the Woodrow

[24] DSEIS at 3.4-34.

Wilson Bridge in Virgina/Maryland evaluated the economic impact of a lower fixed span. This found that the drawbridge would cost $41–77 million and the estimated economic benefits lost would be $111–178 million, more than two-to-one.[25] That information permitted a reasoned choice to continue with a drawbridge on the Capital Beltway/Interstate 95, one of the busiest crossings in the nation.

Courts have warned that "NEPA review cannot be used 'as a subterfuge designed to rationalize a decision already made.'" *Env't Def. Ctr. v. Bureau of Ocean Energy Mgmt.*, 36 F.4th 850, 882 (9th Cir. 2022) (quoting *Metcalf v. Daley*, 214 F.3d 1135, 1142 (9th Cir. 2000)). But the DSEIS here has so many gaps that it cannot support a reasoned decision for a fixed span. The logical conclusion is that a decision has already been made.

C. The Effects Analysis Is Inaccurate, Too Narrow, and Inconsistent With Coast Guard Policies.

The Coast Guard, by letter dated October 13, 2021, put the IBR, FHWA and FTA on notice that, "we want to ensure the IBR team understands the changes to the USCG bridge permit process since the 2012 Columbia River Crossing (CRC) project and understands a new bridge permit application must be submitted in accordance with the 2016 BPAG."[26] According to the BPAG and the Coast Guard-FHWA Memorandum of Understanding, the project sponsor is to prepare a navigation impact report early in project planning.[27] The BPAG includes clearly defined parameters for the required navigation impact report, many of which directly apply to CBC.[28]

The Coast Guard's revised bridge permit application guide includes an appendix entitled "Waterway Data Requirements."[29] This appendix gives guidance on the types of information needed in a bridge permit application under Section 9 of the Rivers and Harbors Act and/or the General Bridge Act of 1946. The 2014 Memorandum of Understanding between the Coast Guard, FHWA, and the Federal Railroad Administration "requires applicants with Department of Transportation funded projects prepare a navigation impact report in order to analyze the navigational impacts of the bridge design alternatives."[30]

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[25] U.S. Dep't of Transp.-Fed. Hwy. Admin., Virginia Dep't of Transp., Md. St. Hwy. Comm'n, and Dist. of Columbia Dep't of Pub. Works, *Final Environmental Impact Statement/Section 4(f) Evaluation*, Woodrow Wilson Bridge Improvement Study, Sept. 2, 1997, at 2-57–58.

[26] U.S. Coast Guard, *Bridge Permit Application Guide*, COMDTPUB P16591.3D, July 2016 ("BPAG"); https://www.dco.uscg.mil/Portals/9/BPAG_COMDTPUB_P16591-3D_July2016.pdf.

[27] BPAG at 2, App'x A; MOA at 5; MOU at 4.

[28] BPAG at A1-7–12.

[29] BPAG, App'x A.

[30] *Id.* at A1-1.

Even though the BPAG navigational impact report criteria clearly apply to CBC, CBC was not contacted as an interested or affected party as a shipyard, marine facility, upstream commercial activity generator, critical infrastructure, key resource, or an important/unique U.S. industrial capacity facility as part of either the 2012 or 2021 NIR outreach. CBC made a request to IBR to be included in its NIR community outreach in a letter dated February 2, 2022 to no avail.

The Navigation section of the DSEIS is simply a repeat of the NIR. The NIR is inaccurate, incomplete, and wholly insufficient as it relates to CBC. To provide a few examples:

- CBC was not evaluated in the NIR under all of the categories which would apply thereto, such as a marine facility. Terminals, berths, barge slips, docks, etc. were all listed (36 of them within three miles), but the barge slips at CBC were not referenced.

- IBR's impacts to existing commercial/industrial development were not addressed, and future use at CBC was speculated to be redeveloped with mixed use (residential, commercial and retail uses) with no reference to a source. CBC has no current plans to redevelop the site. With zoning as industrial and with special exception in Vancouver's zoning code allowing even a broader set of heavy industrial uses, redevelopment as mixed-use would not be permissible. In addition, there are covenants recorded against the property which specifically prohibit residential development on the property.

- There is no discussion as required by the BPAG of CBC's unique U.S. industrial capacity. Why do these users exist in a cluster at CBC? Because CBC is one of the only industrial sites on the West Coast with heavy industrial manufacturing capabilities that is close to the Pacific Ocean for transporting goods to deployment sites.

- The DSEIS contains no discussion of development opportunities at CBC or its future viability for marine related industry (i.e. wind energy) even though there are nearly 50 acres of undeveloped, industrially zoned property (currently being used as outside storage, laydown or outdoor assembly space) within this marine dependent, one-of-a-kind manufacturing facility. Circumstances have changed since the NIR's conclusory analysis on off-shore wind development in 2012. CRC's analysis of impacts to CBC amounted to a simple conclusion that parts for off-shore wind development could be produced in other locations and in new facilities created for that purpose. The 2012 analysis ignored impacts associated with developing new industrial manufacturing facilities. Twelve years ago, off-shore wind was a speculative enterprise. Now, the Bureau of Ocean Energy

Management ("BOEM") intends to lease two areas off-shore of Oregon for off-shore wind development. As a New York Times article noted in December 2023, off-shore wind projects in the United States are expensive because the country lacks a robust domestic supply chain. "[M]anufacturers cannot justify building large factories if they don't know whether there will be enough demand."[31] It is no longer reasonable to assume without support that off-shore wind turbines can and will be built anywhere along the West Coast.

- Although mitigation for impacts to revenue and potential relocation costs incurred by tenants at CBC was referenced in the 2022 NIR, no mitigation was proposed for impacts on CBC induced by an impairment to the Columbia River Maritime system by the proposed LPA. The DSEIS therefore does not meet the requirements of Section S of BPAG Appendix A.

To further illustrate the inadequacy of the NIR process and resulting work product one only need review the USCG process and associated directives, CBC was contacted as part of the U.S. Coast Guard's Navigation Only Public Notice and provided comments. The USCG subsequently issued the PNCD, which referenced CBC twenty-two times in its delineation of the factors that informed the USCG's conclusion on vertical clearance. All these references supported the PNCD's conclusion that the Locally Preferred Alternative's (LPA) VNC of 116 feet is not approvable, and that any proposed new bridge would need to meet or exceed the existing VNC of the current I-5 twin bridges of 178 feet. This shows that the NIR that was submitted to the USCG was incomplete and insufficient.

The NIR and the Navigation discussion are also inconsistent with Coast Guard procedures. This reveals serious gaps in the effects analysis.

In the BPAG, Section G of Appendix A directs an applicant to include a description of "the present and … prospective commercial navigation and the cargoes moved on the waterway".[32] It asks whether "the proposed bridge(s) [will] affect the safe, efficient movement of any segment of the present or prospective commercial fleet operating on the waterway?" In answering that question, the applicant is directed to provide vessel-specific details. In the same section, the applicant is asked whether the proposal will "impact existing and future cruise ship ports-of-call/terminals" or if "the proposed bridge(s) clearance [will] impact *present and/or prospective* upstream commercial activity, e.g., jobs and economic growth and development". If the answer to the latter question is yes, the applicant must address "any existing or planned commercial/industrial developments negatively affected by the proposed clearances and discuss

[31] Ivan Penn et al., "What Ails Offshore Wind: Supply Chains, Ships and Interest Rates," *N.Y. Times*, Dec. 11, 2023; https://www.nytimes.com/2023/12/11/business/energy-environment/offshore-wind-energy-east-coast.html.
[32] BPAG at A1-7.

the economic impacts the proposed clearances will have on these businesses."[33] The applicant must also "[p]rovide input from waterway depend[e]nt facilities concerning future use;" describe "land use zoning along the waterway (particularly within the riparian zone);" and "Include input from facilities based on business plans." Section G concludes by seeking "any additional information concerning the potentially impacted or burdened users of the waterway as well as the future use of the waterway."[34] Section I asks whether the bridge will block access to any local service providers and whether those providers are "considered critical infrastructure, key resources, or important/unique U.S. industrial capability (i.e., are these facilities unique or one of only a few of the type in the area?)" The applicant must "[a]ddress whether the proposed clearances negatively affect those facilities and their customers."[35]

By the structure of these questions, it is clear that the Coast Guard considers "users of the waterway" to include any commercial activity that is affected by the clearance of a proposed bridge. Thus, IBR has taken a restrictive view of waterway users and its effects analysis that falls short of applicable requirements.

The Program's identification of reasonably foreseeable actions and effects is too narrow. The DSEIS focuses on "the area where most physical changes associated with the Program would occur."[36] This does not adequately account for the full scope of effects from the project. As in *Preserve Our Island v. U.S. Army Corps of Engineers*, this "narrow geographic focus and limitation on future events to be considered undercut the scope and effect of the cumulative effects analysis." No. C08-1353RSM, 2009 WL 2511953, at *17 (W.D. Wash. Aug. 13, 2009). The effects analysis should be expanded to fully consider all types of impact, not just the physical footprint of the bridge and highway.

D. The Movable-Span Option Is Not Appropriately Designed or Sufficiently Considered.

Although the DSEIS includes a movable-span option at the insistence of the Coast Guard, IBR's treatment of that option is questionable. There is not nearly the level of detail regarding the movable span as compared to the fixed span. This is inconsistent with FHWA regulations at 23 C.F.R. § 771.123, which instruct that while one alternative may be developed in more detail than others, "[t]he development of such higher level of detail must not prevent the lead agency from making an impartial decision as to whether to accept another alternative that is being considered in the environmental review process."[37] The DSEIS does not explain why the movable-span would have a minimum height of 92 feet when closed—compared to lower

[33] *Id.* at A1-8.
[34] *Id.*
[35] *Id.* at A1-9.
[36] DSEIS at 3.23-4.
[37] As of 2005, when CRC scoping began, this language was at 23 U.S.C. § 139(f)(4)(D).

heights, this would seem to dramatically increase cost.[38] The project should consider varying heights that would optimize both cost and navigation, rather than designing the most expensive alternative to make a movable span seem less viable.

E. IBR Has Not Taken the Required Hard Look at Effects on the Transportation System.

The transportation analysis and assumptions about traffic needs fail to analyze induced transportation demand from the construction of the project. For over a decade, it has been clear that "agencies must analyze the impacts of the increased demand attributable to the additional [transportation infrastructure] as growth-inducing effects falling under the purview of 40 C.F.R. § 1508.8(b)."[39] *Barnes v. U.S. Dep't of Transp.*, 655 F.3d 1124, 1139 (9th Cir. 2011). The DSEIS does not do this.

The transportation section does not mention induced demand at all. DSEIS section 3.1. The transportation technical report claims that "[t]he Modified LPA is designed to support the level and character of growth that is already anticipated in these growth planning efforts, and therefore there would be a low potential for additional indirect effects or induced demand…." Transp. Tech. Rept. at 6-1. This entirely fails to consider a key aspect of the problem or even to acknowledge its existence. Again, the large data gaps raise the specter of decision before analysis, the opposite of what NEPA requires.

IV. Conclusion

Thank you for considering these comments. Please contact the undersigned if you have any questions.

Very truly yours,

SCHWABE, WILLIAMSON & WYATT, P.C.



Lawson E. Fite

LEF:cw

[38] *See* DSEIS at 2-30.

[39] Substantially identical language is in the present NEPA regulations at 40 C.F.R. § 1508.1(*i*)(2).

IBR Draft SEIS - RECORD #3099 DETAIL

First Name :	Lucy
Last Name :	Cohen
Attachments :	DSEIS-3099_Cohen_Original.pdf (5 kb)

IBR Draft SEIS - RECORD #3099 DETAIL

Submission Date : 11/18/2024
First Name : Lucy
Last Name : Cohen
Business/Organization/Agency :

Submission Input :

First Name:
Lucy

Last Name:
Cohen

Email:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
The IBR is such an incredible opportunity to build thoughtful, safe, useful, and connective public infrastructure that will affect our region's communities for generations. Please, include safe, easily accessible protected bike paths that link to existing and planned networks on both sides of the bridge. Please include public transportation infrastructure that serves current AND future needs and incentivizes the use of public transportation. And do not use this project to expand highway lanes, which are polluting the air, dividing communities, and moving our region backwards, not forwards toward a cleaner, more thoughtful, people-first region.

JCA comment #: 711

IBR Draft SEIS - RECORD #3100 DETAIL

First Name :	Shelan
Last Name :	Stritzke
Attachments :	DSEIS-3100_Stritzke_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #3100 DETAIL

Submission Date :	11/18/2024
First Name :	Shelan
Last Name :	Stritzke
Business/Organization/Agency :	

Submission Input :

The new bridge and IBR program should be a celebration of our region, not just a utilitarian transportation utility. The hope is that the new I-5 bridge is more than just a way to move traffic from Point A to Point B, but also a place for enjoyment, where people want to linger, observe their surroundings, and have a sense of discovery. The community wants a bridge that celebrates the river, and natural amenities of the area, rather than just passing over it. Please consider view points and promenades that point to the mountains, river features, and landmarks of historic and cultural significance.

IBR Draft SEIS - RECORD #3103 DETAIL

First Name :	Allan
Last Name :	Rudwick
Attachments :	DSEIS-3103_Rudwick_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #3103 DETAIL

Submission Date :	11/17/2024
First Name :	Allan
Last Name :	Rudwick
Business/Organization/Agency :	Eliot NA

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:
Land Use and Economy

Comment:
We need to be spending our money building the world that we want. In my community, that is not the ability to

look like a copy of every other American city with wide highways dividing the entire thing. This project is a wolf in sheep's clothing, calling itself a bridge replacement but truly being a 7ish mile highway expansion. This project won't even relieve congestion, just move it around a bit and lop off the congestion at the 'shoulders' of the peak. Additionally, and most importantly, it will increase car use tremendously through the project area which will have major downstream effects regionally. The fact that I have been hearing about this project for the past 18 years (since I moved to Oregon) and the project has not changed materially the number of interchanges or width of the road despite this being the main complaints that I hear about the project is a sign that government is not remotely responsive to the public.

Consultants and project managers should be embarrassed with the product they are putting out to the public and I hope that this project does not happen AT ALL even though I could support a bridge modernization project. I just don't trust that with over 400 Million spent so far and over $2 Billion committed by the states that this project will be the right size for our COMMUNITIES to thrive. Our region doesn't even have that bad of traffic. Just look north to Seattle and see how much worse off their road network is than ours. This project is a giant handout to construction companies and will not be seen as a benefit after it is built. Please stop and look at other options including a lower level bridge (with drawbridge), tunnel, or rehabbing the existing bridges while adding one more bridge to support a moderate amount of additional vehicle traffic plus transit. This project just is not a winner as drawn up and I can't believe I am having to fight AGAIN against it.

JCA comment #: 577

IBR Draft SEIS - RECORD #3105 DETAIL

First Name :	Kyenne
Last Name :	Williams
Attachments :	DSEIS-3105_Williams_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #3105 DETAIL

Submission Date : 11/17/2024
First Name : Kyenne
Last Name : Williams
Business/Organization/Agency :

Submission Input :

First Name:
Kyenne

Last Name:
Williams

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
My concerns are as follows - I walk, bike, and use public transport exclusively:
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.

2) The multi-use path should be next to the MAX line, not on opposite sides of the bridge as it is currently designed.
3) 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.
4) 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.
Thank you!

JCA comment #: 575

IBR Draft SEIS - RECORD #3107 DETAIL

First Name :	Becky
Last Name :	Hawkins
Attachments :	DSEIS-3107_Hawkins_Original.pdf (6 kb)

IBR Draft SEIS - RECORD #3107 DETAIL

Submission Date : 11/17/2024
First Name : Becky
Last Name : Hawkins
Business/Organization/Agency :

Submission Input :

First Name:
Becky

Last Name:
Hawkins

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Topic Area:
Transportation

Comment:
I urge you to prioritize public transportation and active transportation in the new bridge design. For the last twelve years I've worked in NW and downtown Portland. Several of our staff and many of our customers were from outside of Portland proper. One consistent area of stress and hardship for everyone was driving: unexpected traffic congestion, the cost of gas, and the cost/availability of parking. However, most people didn't have a safe, timely alternative. I had multiple coworkers from Vancouver, WA who very much didn't want to sit in rush hour traffic, pay to store their cars downtown all day, and then sit in traffic again, but they didn't have another viable option. Lots of working parents I know have just accepted that they'll spend hours of their day in a car if their children are to do any socializing or enrichment activities outside of school.
With the Interstate Bridge Replacement, we have a chance to rethink how people move through this region. We can set up the next generation to spend hours a week sitting in the driver's seat staring at the bumper and brake lights in front of them as the air quality gets worse and worse. Or we can offer safe, efficient, affordable ways to get around without a car.

JCA comment #: 573

IBR Draft SEIS - RECORD #3109 DETAIL

First Name :	Janet
Last Name :	Bebb
Attachments :	DSEIS-3109_Bebb_Original.pdf (6 kb)

IBR Draft SEIS - RECORD #3109 DETAIL

Submission Date : 11/17/2024
First Name : Janet
Last Name : Bebb
Business/Organization/Agency :

Submission Input :

First Name:
Janet

Last Name:
Bebb

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
The Interstate Bridge Replacement project is an opportunity to get it right and have active transportation coupled with light rail. Protected from traffic but using the same road bed as the light rail. The corkscrew ramp that is nearly 1/2 mile long and 100 feet will be a disaster. I'm a bike rider and advise against building something that is a pain and actually discourages use. Thanks for listening!

JCA comment #: 571

IBR Draft SEIS - RECORD #3110 DETAIL

First Name :	Emily
Last Name :	Bauer
Attachments :	DSEIS-3110_Bauer_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #3110 DETAIL

Submission Date :	11/18/2024
First Name :	Emily
Last Name :	Bauer
Business/Organization/Agency :	

Submission Input :

I do NOT support eliminating the C street ramps. The resulting removal of vital affordable housing is unacceptable in a city plagued by a housing crisis.

IBR Draft SEIS - RECORD #3112 DETAIL

First Name :	Janet
Last Name :	Roxburgh
Attachments :	DSEIS-3112_Roxburgh_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #3112 DETAIL

Submission Date : 11/17/2024
First Name : Janet
Last Name : Roxburgh
Business/Organization/Agency :

Submission Input :

First Name:
Janet

Last Name:
Roxburgh

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Neighborhoods and Equity

Comment:

More than 3,000 Hayden Island residents, as well as many businesses, are at ground zero of IBRP's proposed new bridge, and will all be directly impacted, for many years.

Since the massively over-scaled proposed IBRP bridge project, (that is following closely in the footsteps of the CRC, and with a price tag that we can't really afford), may take up to 15 YEARS to complete, the IBRP plan of temporarily relocating homes or businesses simply seems unrealistic. Many local businesses and related jobs will in fact be lost, probably forever. The arrival of essential goods by freight will immediately take a huge hit due to increased delays and detours, (and tolls) - and time is money! There could also be an increased risk of

spoilage of perishables.

The busy island shopping center will be at high risk of failure due to greatly decreased numbers of shoppers because they will want to avoid going to areas that are burdened with heavy equipment and construction work, polluted air, sustained noise and vibrations, extensive island street and road changes, traffic disruptions, detours and rerouting to the busy I-205.

TOLLING in both directions, (needed because of how incredibly expensive this proposed IBRP bridge will be to build), will impact the freight trucks that have more axels, and this added tolling cost for the companies or contractors will end up being added onto the costs of the goods and services. This is going to particularly impact families and people on limited incomes.

During the time construction work is being done for the proposed IBRP bridge, the health and well-being of Hayden Island's residents will be negatively impacted by most of the same issues as the businesses. The local businesses and the shopping center that many island residents depend on for jobs or supplies will be affected. Residents will have to cope with all of the heavy equipment and construction work around them, polluted air, sustained noise and vibrations, extensive island street and road changes, traffic disruptions, and detours and rerouting. TOLLING will also have a huge negative impact on residents, and they are really concerned.

As it turns out, the claims of overall benefits to Hayden Island made by IBRP and others not living on the island, are incorrect. Instead, there will be a huge negative impact that undermines the ability of the island community to thrive and survive.

Communities matter, and at a time when there is such a great need for housing, all established communities, especially those with a large low-income population, need to be strongly protected. Communities should not be considered or treated as collateral damage. The lessons of the tragedy that happened to the once thriving Albina community need to be learned.

Please design a river crossing that is affordable, and that will have far less destructive impacts on the environment and on the Hayden Island community, and Vancouver. Design a river crossing that also adheres to the U.S. Coast Guard's mandate of a vertical height of 178 feet, required for the safe navigation passage for normal and emergency river traffic. The U.S. Coast Guard recommended a bascule-style bridge, or a tunnel. It is important that this recommendation is taken very seriously.

Thank you.

JCA comment #: 569

IBR Draft SEIS - RECORD #3113 DETAIL

First Name :	Evan
Last Name :	Waymire
Attachments :	DSEIS_3113_Waymire_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #3113 DETAIL

Submission Date : 11/18/2024
First Name : Evan
Last Name : Waymire
Business/Organization/Agency :

Submission Input :

The forecast traffic demand for the I-5 bridge wildly exaggerates the future traffic the replacement bridge will need to accommodate. Actual, measured traffic on the existing bridge has fallen by 15,000 vehicles per day since 2019 and the rate of growth in traffic volumes since has been negligible.
The replacement bridge can safely be designed to accommodate no more vehicle traffic than the existing bridge.
I urge that congestion pricing be included in immediately to: help fund the replacement bridge, level traffic volumes on the bridge throughout the day to mitigate slowdowns, and help manage future traffic demand on the bridge. Electric utility industries have demonstrated that demand management strategies are quite successful at reducing spikes in demand that would otherwise tax the electric grid, without inconveniencing utility customers or causing customer uproar. Similar demand management strategies are appropriate and necessary for the I-5 Columbia River bridge and its replacement.

IBR Draft SEIS - RECORD #3115 DETAIL

First Name :	Gillian
Last Name :	Wallis
Attachments :	DSEIS_3115_Wallis_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #3115 DETAIL

Submission Date :	11/17/2024
First Name :	Gillian
Last Name :	Wallis
Business/Organization/Agency :	Columbia Fourth Building LLC

Submission Input :

First Name:
Gillian

Last Name:
Wallis

Business or Organization:
Columbia Fourth Building LLC

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Acquisitions and Displacement

Comment:
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.

JCA comment #: 567

IBR Draft SEIS - RECORD #3117 DETAIL

First Name :	Debbie
Last Name :	Nelson
Attachments :	DSEIS_3117_Nelson_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #3117 DETAIL

Submission Date :	11/18/2024
First Name :	Debbie
Last Name :	Nelson
Business/Organization/Agency :	

Submission Input :

Don’t ruin Hayden Island community. We visit friends and restaurants there. And don’t charge tolls unless absolutely necessary. $ should come from federal government.

IBR Draft SEIS - RECORD #3118 DETAIL

First Name :	Tara
Last Name :	Wilkinson
Attachments :	DSEIS-3118_Wilkinson_Original.pdf (177 kb)

IBR Draft SEIS - RECORD #3118 DETAIL

Submission Date :	11/17/2024
First Name :	Tara
Last Name :	Wilkinson
Business/Organization/Agency :	The Intertwine Alliance
Attachments :	Intertwine-Alliance-comments-on-Draft-SEIS-for-Interstate-Bridge.pdf (174 kb)

Submission Input :

First Name:
Tara

Last Name:
Wilkinson

Business or Organization:
The Intertwine Alliance

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
Please see attached PDF for Intertwine Alliance comments on the Draft SEIS for the Interstate Bridge Replacement Project, calling for more focus on usability for active transportation and public transportation users, connectivity with the regional trails system, and environmental/climate impacts.

Attachment (maximum one):
Intertwine-Alliance-comments-on-Draft-SEIS-for-Interstate-Bridge.pdf

JCA comment #: 565

Nov. 17, 2024

Intertwine Alliance Comments on Draft SEIS for Interstate Bridge

SUMMARY

The Intertwine Alliance requests that you please consider the following points to ensure the new bridge be a good experience for those walking, biking and rolling and those using public transportation. It is critical that we get this right for our communities. We also need the new bridge to improve, or at least not detract from, connectivity with regional trails in its vicinity. Finally, there needs to be a closer look at environmental and climate impacts.

The Intertwine Alliance is a bi-state regional coalition of 80 public, private and nonprofit partners advocating for investments in parks, trails, greenspace and equitable access to nature. We do this work in alignment with advocates in transportation justice and affordable housing.

We are 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.

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.

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.

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.

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.

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 half-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 multi-use path at the bridge's grade from Evergreen to the riverfront so that walkers/rollers/riders have direct access to the bridge.

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 half-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.

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.

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.

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 8 to 80 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.

Noise, dirt, and debris: Active transportation users need protection from road noise, dirt and vehicle debris.

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.

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.

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.

If a two-level bridge, there should be prevention of rain (and other liquid) running off onto the multi-use path.



Personal Safety: Bridge connections should adequately separate people walking, biking, and rolling from motor vehicles and the bridge, and approach pathways should include adequate lighting.

Emergency Access: Medical and police vehicles must be able to directly access the multi-use path. Lack of embedded rail ties prevent ambulances and emergency responders from directly supporting those using the multi-use path. If emergency responders are expected to access multi-use path by parking on the highway shoulder and scaling the divider, we are concerned there is not sufficient separation between automobiles traveling at highway speeds and active transportation modes.

Operations & Maintenance of Active Transportation System
Active transportation paths must have a long-term financial plan for clearing the right-of-way of debris, glass, trash, snow and ice, etc. The bridge maintenance and operations plan should include clearing active transportation routes and pathways on bridge and all along the approaches

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.

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.

Reducing single-occupancy vehicle miles traveled will reduce air particulate pollution. Modeshift to transit and active transportation also: reduces noise pollution and reduces the impacts of water runoff, including chemical, oil, tire particulate and brake particulate runoff.

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.

Thank you for considering all of these critical points. We must get this bridge right for our community and our climate.

Tara Wilkinson, Director
The Intertwine Alliance
tara@theintertwine.org



IBR Draft SEIS - RECORD #3120 DETAIL

First Name :	Alex
Last Name :	Haupt
Attachments :	DSEIS-3120_Haupt_Original.pdf (6 kb)

IBR Draft SEIS - RECORD #3120 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:
Visual Quality

Comment:
The bridge design shown is significantly less aesthetically pleasing than the current bridge. Could the concrete be used as a "canvas" for artwork such as representations of the original bridge, other features of the Portland-Vancouver area (perhaps historic Vanport in particular), and/or Native culture (if local Native artists are available and interested)?

JCA comment #: 563

IBR Draft SEIS - RECORD #3122 DETAIL

First Name :	Kirsten
Last Name :	Adams
Attachments :	Associated General Contractors Oregon_Columbia Chapter_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #3122 DETAIL

Submission Date :	11/18/2024
First Name :	Kirsten
Last Name :	Adams
Business/Organization/Agency :	Associated General Contractors Oregon-Columbia Chapter

Submission Input :

On behalf of the nearly 780 members of Associated General Contractors Oregon-Columbia Chapter, I am writing to support the Interstate 5 Bridge Replacement (IBR) Program as it progresses through the review process for the Draft Supplemental Environment Impact Statement (SEIS), published September 20, 2024. AGC Oregon-Columbia Chapter represents general and specialty contractors across the state of Oregon and Southwest Washington, comprised of both urban and rural, union and open shop, small business up to the largest construction companies based in Oregon.

The IBR project is unique in its significance to the local, state and national economies as it is the main connector between Oregon and Washington along Interstate 5, which runs across the United States from Canada to Mexico. As a net export state, Oregon's ability to move goods through the corridor within the scope of the IBR project holds vital significance to Oregon's economic competitiveness. Our organization recognizes the need for this project, and appreciates the work being done by the IBR project team to ensure timely delivery of this project.

Our members build and maintain Oregon's vast portfolio of bridges and highway systems across the state. Ensuring that the IBR project is completed on-time and on-budget, while allowing local contractors a fair opportunity to competitively bid on the project, is at top of mind for our membership, as the state and federal governments grapple with the complex nature of this Mega Project. AGC has been engaged in the replacement of the Interstate Bridge since the Columbia River Crossing (CRC) conversations began over a decade ago and worked diligently in the 2023 Oregon Legislative Session to ensure Oregon's portion of the project funding was committed in order to keep the IBR project moving forward.

With the understanding of the significance that a project like the IBR program has presented within the Draft SEIS, AGC continues to engage in the process to ensure its ultimate success. Our member companies employ thousands of skilled construction professionals across Oregon and Southwest Washington. We would like to see public contracting agencies make every effort to ensure that all contractors, no matter the size or business model, are able to bid on the IBR project.

A project of IBR's magnitude, spanning potentially 15 years, will require a great number of skilled construction professionals, which ties into the workforce values both AGC and the IBR team have identified as a crucial element of our industry's future. AGC has worked closely with workforce development professionals and other education partners for years to bring Oregon's construction workforce pipeline into parity with the needs we continue to face each year. We would like the opportunity to work with the program administrators to develop a reliable workforce plan which will meet the needs of the IBR project and will put Oregon on the right path to fulfilling our workforce needs in the construction industry for the future.

We do not believe that the IBR program, nor the construction industry's workforce needs can or should be solved through contract specifications or mandated agreements from public contracting agencies. Instead, the

program should use the time it has before letting out contracts to convene a group whose values are aligned on meeting the industry's workforce needs.

AGC looks forward to continuing its collaboration with the IBR program team to meet the goals of the project, and keep Oregon's economic competitiveness moving forward.

Thank you for the opportunity to comment, and please feel free to reach out with any follow-up.

Best Regards,

Kirsten Adams

Director and Counsel – Policy and Public Affairs

Associated General Contractors Oregon-Columbia Chapter

IBR Draft SEIS - RECORD #3123 DETAIL

First Name :	Alex
Last Name :	Haupt
Attachments :	DSEIS-3123_Haupt_Original.pdf (6 kb)

IBR Draft SEIS - RECORD #3123 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:
Induced Demand

Comment:
As I'm sure the project's transportation engineers are aware, increases in standard vehicle lanes can only reduce congestion up to a point. Even if the throughput from proposed additional lanes overcomes induced demand on the bridge and result in a net decrease in congestion with current crossing traffic levels or those of the near future, eventually population growth will overwhelm any benefits. This means that the proposed public transit and active transportation additions are essential, and the recommendations from the Just Crossing Alliance should be implemented. Public transit and active transport, if implemented well, would divert significant traffic away from the main lanes, side-stepping induced demand and congestion and allowing for a much faster and more pleasant experience for those who need or strongly prefer to use private vehicles (shipping, tradesworkers, emergency responders, etc.).

JCA comment #: 561

IBR Draft SEIS - RECORD #3124 DETAIL

First Name :	Stephen
Last Name :	Stetson
Attachments :	DSEIS_3124_Stetson_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #3124 DETAIL

Submission Date :	11/18/2024
First Name :	Stephen
Last Name :	Stetson
Business/Organization/Agency :	

Submission Input :

I understand the need. That being said, why do we need light rail here. when the Vine Buses are never filled or even close the most I have observed was ten people on that huge waste of money. Now why do we need to spend even more to have a train that Portlanders are afraid to ride. Yes it in unsafe, and we DO NOT those problems here!

IBR Draft SEIS - RECORD #3125 DETAIL

First Name :	Tabitha
Last Name :	Reeder
Attachments :	DSEIS_3125_Reeder_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #3125 DETAIL

Submission Date :	11/18/2024
First Name :	Tabitha
Last Name :	Reeder
Business/Organization/Agency :	Private Citizen in the Shumway Neighborhood

Submission Input :

As a resident of the Shumway neighborhood, I urge the IBRP to provide additional mitigation for the air quality health issues related to living and working near the Interstate 5 and I-5 bridge. We are directly impacted by air quality from the IBR project, during construction and post construction. The Interstate 5 and bridge are the corridors that facilitate traffic and pollution resulting from vehicle traffic. The IBR project will be the cause of continuing and increasing pollution from vehicles. It is well documented that air pollutants from roadway traffic is causally related to asthma, childhood lung development, cardiovascular diseases, and adverse reproductive issues and other health affects for young and old alike. The SEIS states that the IBR project would not cause long-term, adverse air quality impacts. This is blatantly false due to traffic related pollution as previously stated. The air quality impacts need to be assessed and disclosed. I ask that a Supplemental to the SEIS be prepared fully evaluating the impacts of air quality from traffic anticipated by the IBR project. The public needs to have the opportunity to review and comment on this.

IBR Draft SEIS - RECORD #3126 DETAIL

First Name :	J
Last Name :	Mosebar
Attachments :	DSEIS_3126_Mosebar_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #3126 DETAIL

Submission Date :	11/18/2024
First Name :	J
Last Name :	Mosebar
Business/Organization/Agency :	

Submission Input :

The bottle neck north seems to be caused by the on-ramp at Jantzen Beach. Many businesses have closed in that area due to crime. Please don’t bring the crime train to Vancouver.

IBR Draft SEIS - RECORD #3127 DETAIL

First Name :	Ernie
Last Name :	Suggs
Attachments :	DSEIS_3127_Suggs_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #3127 DETAIL

Submission Date : 11/18/2024

First Name : Ernie

Last Name : Suggs

Business/Organization/Agency :

Submission Input :

Ok,
No tolls and no Light Rail.
The people do not want it.
Why do you keep pushing it?
The design I have seen shows me that by the time you build it
it will be inadequate.

IBR Draft SEIS - RECORD #3128 DETAIL

First Name :	Karen and Craig
Last Name :	Rankine
Attachments :	DSEIS_3128_Rankine_Original.pdf (4 kb)

IBR Draft SEIS - RECORD #3128 DETAIL

Submission Date : 11/18/2024
First Name : Karen and Craig
Last Name : Rankine
Business/Organization/Agency :

Submission Input :

My husband and I have concerns about and suggestions regarding the Interstate Bridge Replacement Project, the Interstate Bridge Replacement project construction plans, and how the post-construction operation will impact our home and Shumway Neighborhood in which we live, including vibration, audible, visual and air quality impact. We look forward to working with project officials, staff, and consultants to determine mitigation of the negative impacts to our home and neighborhood livability. Here are many of our concerns:

Auditory, visual, air quality, and construction vibration impacts to our home and surrounding Shumway Neighborhood area. We ask to be active participants in the mitigation plans to address these adverse impacts, as well as the Shumway Neighborhood residents advising project planners on sound wall construction, height, and aesthetics. Since the loss of all current freeway vegetation is eminent, we ask that trees will be planted in the neighborhood and adjacent areas to mitigate near-road air quality issues. With all trees of a consequential size (not yearlings) to be planted as soon as the remaining construction is completed as to 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. We ask that the project ensure the survival or replacement of the trees for at least 10 years.

The sound wall, which is seen from our front yard needs to receive the highest standard anti-graffiti coating available at the time of its construction (currently, we can see graffiti at 30th and I Streets along the wall), and the project will ensure funding for graffiti removal for for all subsequent from date of completion. I would love to see the alley along the wall turned into a row of trees, if not we urge that the sound wall be designed to be as aesthetically pleasing as possible, particularly when viewed from the west.

Construction vibration impacts are a huge concern to these owners of a 1940 home with lathe and plaster construction and a basement. During the 1980s, homes up to 2 blocks from the overpass replacements of that time, sustained cracks to interior plaster walls. 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. We expect any and all damage that occurring to our home and detached garage will be repaired promptly at project expense. Interior air quality is of grave concern. In the past several years, as traffic along the I-5 corridor has increased, we now have coating on the inside of our window (ICK!). This is quite distressing to think about what this microscopic particulate matter is we are breathing as well as having to clean it several times a year. Additionally, our entire yard is a garden and it is very important that the air in our neighborhood is cleaner for the produce we eat and the essential pollinators to our plants and fruit trees, bushes and canes. We love living in the Shumway neighborhood and have been here over 30 years. Much has changed with regards to noise, air quality and general livability over time - all being negative.

We ask to have home mitigations that include: improved and enhanced whole house indoor air quality filtration systems, increased insulation throughout the home to reduce freeway noise and indoor pollution, addressing windows with improved storm windows (we have original wood framed 1940 windows throughout the home with early 1970s era exterior storms) to address indoor air and noise pollution, address vegetation or fencing that will improve visual, air, and noise pollution concerns, and repairs to all negative impacts to the lathe and plaster walls and ceilings and basement walls and floor that is expected to happen with our home being located to close to the construction sites and the age of its construction.

Another area of concern is 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. For example, over the course of the IBR project, at various meetings, I get a different answer for my questions each time - usually related to elevated on ramps, overpass construction start dates, and when the project work along and in the Shumway neighborhood will take place.
We are concerned that a design is not yet available for the Fourth Plain Boulevard overpass adjacent to the neighborhood, as well as the 29th and 33rd Street overpasses are "proposed". As residents living wedged between these two overpasses, we and the Shumway Neighborhood expect input, involvement and notification the overpasses design when available.

Craig and I oppose tolling until the project is complete (actually we are against this heavily one-sided tolling altogether) - 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, along with required and approved mitigations. Until that time we expect to live with dirty air, unbearable construction noise and vibration, and likely a decade of increase road congestion, neighborhood cut-through traffic, speeding, and greatly diminished quality of life. We cannot accept tolls along with these afflictions. We require a toll exemption for Shumway residents until completion.

Comments respectively submitted,
Karen and Craig Rankine

IBR Draft SEIS - RECORD #3129 DETAIL

First Name :	Jim
Last Name :	Luce
Attachments :	DSEIS_3129_Luce_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #3129 DETAIL

Submission Date :	11/18/2024
First Name :	Jim
Last Name :	Luce
Business/Organization/Agency :	

Submission Input :

Good to end it.

Our comments are unlikely to make any difference – but that’s expected.

Jim Luce

IBR Draft SEIS - RECORD #3130 DETAIL

First Name :	Wayne
Last Name :	Clemmer
Attachments :	DSEIS_3130_Clemmer_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #3130 DETAIL

Submission Date :	11/18/2024
First Name :	Wayne
Last Name :	Clemmer
Business/Organization/Agency :	

Submission Input :

Put the tolling issue on the ballot and let the people decide if we want this bridge and light rail at such a high cost.

IBR Draft SEIS - RECORD #3132 DETAIL

First Name :	Emma
Last Name :	Wind
Attachments :	DSEIS-3132_Wind_Original.pdf (6 kb)

IBR Draft SEIS - RECORD #3132 DETAIL

Submission Date : 11/17/2024
First Name : Emma
Last Name : Wind
Business/Organization/Agency :

Submission Input :

First Name:
Emma

Last Name:
Wind

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 #: 559

IBR Draft SEIS - RECORD #3134 DETAIL

First Name :	Caleb
Last Name :	Novotny
Attachments :	DSEIS-3134_Novotny_Original.pdf (6 kb)

IBR Draft SEIS - RECORD #3134 DETAIL

Submission Date : 11/17/2024
First Name : Caleb
Last Name : Novotny
Business/Organization/Agency :

Submission Input :

First Name:
Caleb

Last Name:
Novotny

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 #: 557

IBR Draft SEIS - RECORD #3136 DETAIL

First Name :	Oskar
Last Name :	Bates
Attachments :	DSEIS-3136_Bates_Original.pdf (6 kb)

IBR Draft SEIS - RECORD #3136 DETAIL

Submission Date : 11/17/2024
First Name : Oskar
Last Name : Bates
Business/Organization/Agency :

Submission Input :

First Name:
Oskar

Last Name:
Bates

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.
No more cars

JCA comment #: 555

IBR Draft SEIS - RECORD #3138 DETAIL

First Name :	Alexandra
Last Name :	Rosenberg
Attachments :	DSEIS-3138_Rosenberg_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #3138 DETAIL

Submission Date :	11/17/2024
First Name :	Alexandra
Last Name :	Rosenberg
Business/Organization/Agency :	OSPIRG

Submission Input :

First Name:
Alexandra

Last Name:
Rosenberg

Business or Organization:
OSPIRG

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.
This interstate will add traffic and work against our climate goals. Please do not built it!

JCA comment #: 553

IBR Draft SEIS - RECORD #3139 DETAIL

First Name :	Gary
Last Name :	Gaussoin
Attachments :	DSEIS-3139_Gaussoin_Original.pdf (5 kb)

IBR Draft SEIS - RECORD #3139 DETAIL

Submission Date :	11/18/2024
First Name :	Gary
Last Name :	Gaussoin
Business/Organization/Agency :	Silver Eagle Mfg. Co.

Submission Input :

As an Oregon business owner, and a Clark County Washington resident, I have commuted across the Columbia River via I-5 and I-205 for the past 54 years. I am intimately familiar with traffic and the roads and I strongly support the suggestions provided by the Columbia Corridor Association.

Gary Gaussoin

President

Silver Eagle Manufacturing Company

[redacted]

IBR Draft SEIS - RECORD #3141 DETAIL

First Name :	Kelsey
Last Name :	Green
Attachments :	DSEIS-3141_Green_Original.pdf (6 kb)

IBR Draft SEIS - RECORD #3141 DETAIL

Submission Date : 11/17/2024
First Name : Kelsey
Last Name : Green
Business/Organization/Agency :

Submission Input :

First Name:
Kelsey

Last Name:
Green

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.

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JCA comment #: 551

IBR Draft SEIS - RECORD #3143 DETAIL

First Name :	Devon
Last Name :	Stiteler
Attachments :	DSEIS-3143_Stiteler_Original.pdf (6 kb)

IBR Draft SEIS - RECORD #3143 DETAIL

Submission Date : 11/17/2024
First Name : Devon
Last Name : Stiteler
Business/Organization/Agency :

Submission Input :

First Name:
Devon

Last Name:
Stiteler

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.

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No bridge pretty please

JCA comment #: 549

IBR Draft SEIS - RECORD #3145 DETAIL

First Name :	Sydney
Last Name :	Case
Attachments :	DSEIS-3145_Case_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #3145 DETAIL

Submission Date :	11/17/2024
First Name :	Sydney
Last Name :	Case
Business/Organization/Agency :	OSPIRG

Submission Input :

First Name:
Sydney

Last Name:
Case

Business or Organization:
OSPIRG

Email:
[redacted]

Phone:
[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 #: 547

IBR Draft SEIS - RECORD #3147 DETAIL

First Name :	Robert
Last Name :	Duvoisin
Attachments :	DSEIS-3147_Duvoisin_Original.pdf (6 kb)

IBR Draft SEIS - RECORD #3147 DETAIL

Submission Date : 11/17/2024
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.
Best regards.

JCA comment #: 545

IBR Draft SEIS - RECORD #3149 DETAIL

First Name :	Douglas
Last Name :	Kean
Attachments :	DSEIS-3149_Kean_Original.pdf (6 kb)

IBR Draft SEIS - RECORD #3149 DETAIL

Submission Date : 11/17/2024
First Name : Douglas
Last Name : Kean
Business/Organization/Agency :

Submission Input :

First Name:
Douglas

Last Name:
Kean

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
First and foremost, this project ought to be focused on replacing this existing bridge while offering modes that were previously not accommodated.

The DSEIS does not provide significant justification for a second auxiliary lane. If the project puts less emphasis on auto capacity, those resources can be channeled towards enhancements for transit and active transportation. Extra auto lanes should be omitted to accommodate multi-lane BRT or heavy rail track, making it a truly future proofed project. Light rail stations should be built with four car platforms to accommodate for future capacities.

Active transportation should have meaningful separation from car traffic, for both safety and health reasons. The path(s) must be wide enough (18 ft at least if shared use) with a meaningful delineation between biking and walking spaces, with benches and viewpoints that can allow people to take breaks and appreciate the surroundings.

The path(s) should include minimal grades and paths extend to evergreen in Vancouver. In Portland the paths should include seamless connections with the Vancouver/Williams corridor in addition to the planned connection at Kenton/Denver. As someone who cycles on the existing bridge these are very important to me, along with many others.

Thank you for reading my feedback. Appreciate your time

JCA comment #: 543

IBR Draft SEIS - RECORD #3151 DETAIL

First Name :	Beth
Last Name :	Stebbins
Attachments :	DSEIS-3151_Stebbins_Original.pdf (6 kb)

IBR Draft SEIS - RECORD #3151 DETAIL

Submission Date : 11/17/2024
First Name : Beth
Last Name : Stebbins
Business/Organization/Agency :

Submission Input :

First Name:
Beth

Last Name:
Stebbins

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
I want to provide input into decision-making around the interstate bridge. It is important to prioritize mass transit and bicycle access, and use metering/toll options to smooth traffic flow (both on the bridge and in other bottlenecks), while not increasing the number of lanes, since that only induces further demand. Equity is also important, so tolling needs to flex lower for low-income people. Thank you for your good work.

JCA comment #: 541

IBR Draft SEIS - RECORD #3153 DETAIL

First Name :	Craig
Last Name :	Rankine
Attachments :	DSEIS-3153_Rankine_Original.pdf (4 kb)

IBR Draft SEIS - RECORD #3153 DETAIL

Submission Date : 11/18/2024
First Name : Craig
Last Name : Rankine
Business/Organization/Agency :

Submission Input :

My wife and I have concerns about and suggestions regarding the Interstate Bridge Replacement Project, the Interstate Bridge Replacement project construction plans, and how the post-construction operation will impact our home and Shumway Neighborhood in which we live, including vibration, audible, visual and air quality impact. We look forward to working with project officials, staff, and consultants to determine mitigation of the negative impacts to our home and neighborhood livability. Here are many of our concerns:

Auditory, visual, air quality, and construction vibration impacts to our home and surrounding Shumway Neighborhood area. We ask to be active participants in the mitigation plans to address these adverse impacts, as well as the Shumway Neighborhood residents advising project planners on sound wall construction, height, and aesthetics. Since the loss of all current freeway vegetation is eminent, we ask that trees will be planted in the neighborhood and adjacent areas to mitigate near-road air quality issues. With all trees of a consequential size (not yearlings) to be planted as soon as the remaining construction is completed as to 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. We ask that the project ensure the survival or replacement of the trees for at least 10 years.

The sound wall, which is seen from our front yard needs to receive the highest standard anti-graffiti coating available at the time of its construction (currently, we can see graffiti at 30th and I Streets along the wall), and the project will ensure funding for graffiti removal for for all subsequent from date of completion. I would love to see the alley along the wall turned into a row of trees, if not we urge that the sound wall be designed to be as aesthetically pleasing as possible, particularly when viewed from the west.

Construction vibration impacts are a huge concern to these owners of a 1940 home with lathe and plaster construction and a basement. During the 1980s, homes up to 2 blocks from the overpass replacements of that time, sustained cracks to interior plaster walls. 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. We expect any and all damage that occurring to our home and detached garage will be repaired promptly at project expense. Interior air quality is of grave concern. In the past several years, as traffic along the I-5 corridor has increased, we now have coating on the inside of our windows (ICK!). This is quite distressing to think about what this microscopic particulate matter is we are breathing as well as having to clean it several times a year. Additionally, our entire yard is a garden and it is very important that the air in our neighborhood is cleaner for the produce we eat and the essential pollinators to our plants and fruit trees, bushes and canes. We love living in the Shumway neighborhood and have been here over 30 years. Much has changed with regards to noise, air quality and general livability over time - all being negative.

We ask to have home mitigations that include: improved and enhanced whole house indoor air quality filtration systems, increased insulation throughout the home to reduce freeway noise and indoor pollution, addressing windows with improved storm windows (we have original wood framed 1940 windows throughout the home with early 1970s era exterior storms) to address indoor air and noise pollution, address vegetation or fencing that will improve visual, air, and noise pollution concerns, and repairs to all negative impacts to the lathe and plaster walls and ceilings and basement walls and floor that is expected to happen with our home being located to close to the construction sites and the age of its construction. As someone who spent his career overseeing groundwater and subsequent indoor air contamination for the WA Department of Ecology, I know these types of requests are not out of line and easily implemented for home owners.

Another area of concern is 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. For example, over the course of the IBR project, at various meetings, my wife has reported getting a different answer to her questions each time - usually related to elevated on ramps, overpass construction start dates, and when the project work along and in the Shumway neighborhood will take place. We are concerned that a design is not yet available for the Fourth Plain Boulevard overpass adjacent to the neighborhood, as well as the 29th and 33rd Street overpasses are "proposed". As residents living wedged between these two overpasses, we and the Shumway Neighborhood expect input, involvement and notification the overpasses design when available.

Karen and I oppose tolling until the project is complete - 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, along with required and approved mitigations. Until that time we expect to live with dirty air, unbearable construction noise and vibration, and likely a decade of increase road congestion, neighborhood cut-through traffic, speeding, and greatly diminished quality of life. We cannot accept tolls along with these afflictions. We require a toll exemption for Shumway residents until completion.

Comments respectively submitted,
Craig Rankine

IBR Draft SEIS - RECORD #3154 DETAIL

First Name :	Ryan
Last Name :	Martyn
Attachments :	DSEIS-3154_Martyn_Original.pdf (5 kb)

IBR Draft SEIS - RECORD #3154 DETAIL

Submission Date :	11/17/2024
First Name :	Ryan
Last Name :	Martyn
Business/Organization/Agency :	

Submission Input :

First Name:
Ryan

Last Name:
Martyn

Email:
[redacted]

Topic Area:
Transportation

Comment:
The project should prioritize active transportation and include a max line, protected bike lanes, and dedicated bus lanes.

JCA comment #: 539

IBR Draft SEIS - RECORD #3156 DETAIL

First Name :	Zach
Last Name :	Lesher
Attachments :	DSEIS-3156_Lesher_Original.pdf (6 kb)

IBR Draft SEIS - RECORD #3156 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:
Land Use and Economy

Comment:
This project is far too expensive while also saddling the Portland area with increased future road maintenance obligations, stormwater liabilities through the increased impermeable surface area, and bulldozing properties which produce revenue in order to replace it with roads, which do not pay taxes. We should save this money and invest instead further in our community through public transportation and active transportation improvements which improve health and save residents money on transportation costs.

JCA comment #: 537

IBR Draft SEIS - RECORD #3158 DETAIL

First Name :	Aidan
Last Name :	Moran
Attachments :	DSEIS-3158_Moran_Original.pdf (6 kb)

IBR Draft SEIS - RECORD #3158 DETAIL

Submission Date : 11/17/2024
First Name : Aidan
Last Name : Moran
Business/Organization/Agency :

Submission Input :

First Name:
Aidan

Last Name:
Moran

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Land Use and Economy

Comment:
The 7.5 billion cost to this project (and likely more, by the end) is far too high and we don't have a clear funding source established for half that cost. Focus on what matters, replace the bridge, add the max line and biking/walking path, but skip all of the extra, unnecessary additions to the freeway system that are bundled in with the bridge replacement.

JCA comment #: 535

IBR Draft SEIS - RECORD #3159 DETAIL

First Name :	Tabitha
Last Name :	Reeder
Attachments :	DSEIS_3159_Reeder_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #3159 DETAIL

Submission Date :	11/18/2024
First Name :	Tabitha
Last Name :	Reeder
Business/Organization/Agency :	Private Citizen

Submission Input :

Regarding traffic, the IBRP SDEIS says that the bottleneck for traffic originates at the bridge, but President Norman Marshall, and expert in transportation demand modeling, says the IBRP is solving for the wrong thig. His examination of the traffic dats shows the bridge is not the bottleneck and that widening the bridge will not improve I-5 congestion and could make it worse. The SEIS misrepresents the existing northbound and southbound traffic conditions in the i-5 corridor, and in doing so, creates an erroneous 'need' for the project. Therefore, the IBRP does not include and adequate purpose and need statement. The IBRP needs to prepare and issue a Supplemental to the SEIS to use the correct information for modeling.

IBR Draft SEIS - RECORD #3161 DETAIL

First Name :	Joshua
Last Name :	Landry
Attachments :	DSEIS_3161_Landry_Original.pdf (10 kb)

IBR Draft SEIS - RECORD #3161 DETAIL

Submission Date : 11/18/2024
First Name : Joshua
Last Name : Landry
Business/Organization/Agency : Bristol Marine Services

Submission Input :

I blame Todd.
He was married to my girlfriend's best friend.
He was square jawed, handsome and waspy. And tall. I'm tall, but he was tall-er.
I'm not typically intimidated by anyone, but somehow he managed to seep in between the little cracks in my armor and strike a chord. Todd was explaining to my girlfriend his involvement with the sea scouts, the auxiliary of the boy scouts of america which deals with sail training. "I'm working on getting my Captain's license" he confessed, puffing out his chest. I had never conceived of such a thing. I had spent my entire life surrounded by the great plains of landlocked, Central Illinois. My last name is Landry, easily rearranged into the anagram DRY LAND. Such a foreign concept was far beyond my imagination and comprehension. This casual comment ignited a spark of jealousy uncommon in me. Between the soft gaps in my armor it wiggled, imbedding itself firmly in the frontal lobe of my brain. My response? If he's going to do it, then I'm just going to have to do it as well.
That was the first time the sea called to me.

Years later after college, I moved to Washington DC, a step up from my sleepy midwestern environs. My friends from college and I had made a pact that we'd all move to New York after design school. I left early, thinking DC would be my first big city, in preparation for NYC. My friends graduated the next year and were making their arrangements to head east. I was preparing to make the transition myself when one thing still bothered me. That comment. Not necessarily getting my captains license, but in a broader sense, the call of the sea, whatever that meant. Here I was, about to move to New York and settle down. I'd never want for anything, ever. I'd have everything I'd ever need right there. However…Once settled down, I would no longer be able to answer the call. This continued to nag at me, dogging me to the point I could ignore it no longer. Finally, as my friends were moving their lives east, I was heading back west. I put everything I owned in storage, broke up with the girl I was dating, rehomed my houseplants, and flew to pacific northwest to get on a boat and that boat would lead me to the sea. I promised myself, once I purged this idiotic urge, I'd be back on track, back to new york and all its promises. I landed in Portland the day before halloween. The plan was to stomp the docks and hopefully, find a fishing boat that needed some green meat, and that would be my in. How very little did I know. I traveled north to Washington, via Seattle and Port Townsend with no luck. My timing was off, I was out of sync with the fishing seasons. I'd have to come back another time. I had some time to kill before my window of opportunity presented itself again. I moved around. I spent some months living on Mount Hood. And when I got sick of the snow, I moved to Austin, Texas. When the heat became too much, I headed back east to see my brother graduate from the University of Maryland. Meanwhile, the seasons were changing, and my window was realigning. I resumed the trek I had started 8 months ago, DC to PDX, except this time, my resources had significantly dwindled. I arrived back in Portland with two dollars in my pocket. I spent a dollar on a jug of water, and saved the other. As long as that dollar remained unspent, I was above rock bottom. I spent the day trying to figure out how I was going to get to sea from the lloyd center transit center. I had made friends last winter during my tenure on mount hood, and they invited me up for a beer. I accepted. It was a direction. I ended up setting up in their backyard in Welches for a couple of weeks. Eventually, I got some work helping some folks in

government camp fix up their house. Here I was, shoveling gravel in 300 dollar designer jeans with a dollar in my pocket. Finally I got a call from some farmer friends in port townsend. They needed help with their summer season and I needed to be in proximity to a fishing fleet. Hard to get on a boat on a mountain, so north I went. I spent the next couple months as an organic farmer, living in a room in the barn, making 40 bucks a week. I hadn't made any real progress on getting to sea despite my proximity. The season was winding down and I hadn't made any real progress. The owner of the farm sat me down, and explained that they wouldn't be needing my help going into the fall. I had a week to figure things out and move on. I saw the Portland Spirit was hiring, and applied. It was on water, so theoretically it qualified I guess. The job was mine if I wanted it, however, I'd have to shave off my fabulous mustache. For some reason, my vision of camaraderie and nature very much had a mustache in it, so with a heavy heart, I declined. I spent the night in the greenhouse, crying, fall's first rain pelting the roof as it lulled me to sleep. I had wasted the better part of the last year and had nothing to show for my efforts. I was nearly 28 years old, and had squandered the final years of my youth on some idiotic dream I didn't fully understand. I was lost. I had lost. I was at the end of my road. But as the saying goes, the night is darkest just before the dawn, something miraculous happened. I had befriended the small community of wooden boat builders who resided in the area. They forwarded me an email concerning a very old, wooden boat that was in need of crew. I did not know such a thing even existed. There existed a community of people who worked, dressed and sailed around on what appears to the uninitiated, an actual pirate ship. I applied and was summarily dismissed. I had zero experience sailing, especially a square rigged boat from the 18th century. I remained steadfast. I was planning to bus down to their home port of Aberdeen Washington and convince them otherwise, when my friend Matt, fresh out of wooden boat school, volunteered to drive us down there. 3 hours later, they hired the pair of us, him as bosun (ship's carpenter) and me as the purser, the ship's accountant. "Matt, pleasure to have you on board, and Joshua, you're going to do alright," the marine operations manager said reluctantly, finalizing our contracts with a handshake (and a healthy dose of doubt). That night, the farmers sent me out in epic fashion in a legendary sendoff at the Whistling Oyster in Quilcene. The next day, there I was, severely hungover, at the dock in Lake Union in Seattle, ready to receive dock lines, as the tall ship Lady Washington, my home for the next six months, crabbed over to the dock.

I was well over my head.

After a few months in Puget Sound, preparations were made to head south. Every year, the boat toured the coast of California, all the way down to San Diego and back ,as a living, breathing, floating museum. We had a deadline to be in San Francisco. It was a year to the day that I had set out on my quest. There's nothing more dangerous on a boat than a deadline and this proved doubly true. We set out in the worst storm the boat had ever weathered. We nosed out into deadly 35 foot confused seas out of Grays Harbor. Late October off the oregon/washington coast can be one of the more unfriendly places in the world . We pushed the boat 40 miles off the coast trying to get around the storm but only succeeded in cutting off communication with the shore. We were (temporarily) labeled as "lost at sea." The most experienced member of our crew, retired coast guard captain Tommy, said it was the worst night at sea he'd lived through. Tommy, our watch leader, joined the rest of the crew, losing their lunch on the leeward side. Meanwhile, me, the midwesterner, Mr. DRY LAND, held the helm for the entire watch. I didn't get sea sick then and I still have yet to to this day. I held that nine foot tiller for four hours as I coaxed the boat's 200 tons of wood and canvas through mountainous walls of water and shrieking winds. It was incredible. Eventually, the next watch was called on deck and I retired below to my berth and somehow managed to fall asleep despite the tumult surrounding me. The next morning, I peaked out the main hatch to a much different scene. The sun rose exposing mountainous waves of chipped glass. We had one sail up, the main course, and were surfing at a screaming 13 knots over these gentle slow rolling mountains. It was the most beautiful thing my eyes had ever seen. I came to a realization. This was it. This is

what I was looking for the entire time. I had spent so long not knowing what it was, but I certainly recognized it when I found it. The brutal beauty of nature and camaraderie of those whom I shared it with was my goal the entire time. And for once in my life, I felt I was exactly where I was supposed to be, I had found my moment in my universe.

I spent the next 5 months on board. Best thing I've ever done. I risked everything on a notion and succeeded. When I got off on valentine's day in Morrow Bay, California, I was ready to resume my life where I'd left off. I moved to New York (this time with a hefty 40 dollars in my pocket). However, something had changed. I had changed. What I thought of as an exorcism before, a last huzzah before I settled down, had transformed into a pilgrimage of sorts. I eventually moved on from New York. In a sharp contrast, moved next to the beach in Hawaii. Came back to the lower 48 and drove slowly across America following Captain Tommy as his shore support while he attempted to be the first person to sail alone through the great lakes and up through the northwest passage. I called it my thousand days. I took a thousand days (roughly 3 years) to do whatever I wanted, as crazy as it might have sounded. Then, and only then, could I justify "settling down".

Just before my 30th birthday, I "moved" to Portland. I had just gotten back from setting up an art show in Chicago at the Museum of Contemporary Art and rode back with Kevin,a hot air balloonist who had offered to smuggle me into Burning Man in his balloon's trailer. I respectfully declined, afterall, it was time to "settle down."

I have been in Portland ever since. The seed of "going to sea" has blossomed into a career. I hold a 100 ton captains license and am an American boat and yacht council member and master technician. I still go to sea from time to time, but I always return home to good ole Portland, Oregon. This January, I finalized the ultimate act of "settling down", I bought a house at JBMI. Staying true to the life aquatic, my house llives on the water. Or more accurately, I bought a view with a house attached to it. I saved every cent I could and bought it in cash, a familial first. I live amongst the most wonderful community. We help each other out. We're accountable to each other and rarely feel the need to lock our doors. I'm surrounded by a robust natural world. As I'm writing this, a sea lion poked his massive head out of the water as he's crossing the harbor. I ran out to the end of the finger and sanpped pictures as he cruised by, ten feet away, oblivious to my presence. Herons, ospreys, eagles, ducks and beavers (is there no other more iconic creatures for oregonians) just to name a few, surround me. The storage on my phone is constantly being filled up with their presence.

In sharp contrast, if I need groceries or a cup of coffee, I can just saunter up the dock and they're there within walking distance. I remember something the mythologist Joseph Campbell once said about the existence of heaven and hell. He imagined there was no afterlife, there was just right here, right now and depending on how you live your life, or experience it, it can be either heaven or hell. So here I am today, writing this in my living room, facing the eastern expanse, in the western shadow of the bridge, surrounded by all manner of riparian creatures, flanked by other fellow weirdos who think this is the only way to truly live and feel alive.

I have found my Heaven.

Many years ago, a young naive man had a revelation at sea, of a sacred convergence of humanity and the natural world, and for the first time in his life he had found his absolute place in the universe. Every morning, I look out my windows as the dawn rises over the river, steam curling off the surface, the cat's paws tickling the water, and I find it anew. Every day. I have a silly name for it. I call it "God on the Water." There is no other place in the universe I'm supposed to be, but right here, right now.

Present.

Epilogue.

I have a 50 year old sailboat I restored named Bernard. It's named after Bernard Moistessier, a very famous

french sailor who participated in the first-of-its-kind solo, around the world, non-stop race in 1968. His boat was named Joshua (after another famous American sailor, Joshua Slocum) and I decided, since he named his boat after me, I should return the favor. Moitessier famously crossed the last of the three capes, the infamous and treacherous CAPE HORN, and pointed his bow towards England, towards the finish line, favored to soon be the race's victor. But something happened out there, during that victory lap. A revelation. Instead of continuing towards the finish line and immortality, he changed course. After 8 months at sea alone, he pointed his bow southwest and continued sailing around the world. Eventually, he had to stop, after sailing another halfway around the world. The press caught up with him and asked him why. Robin Knox Johnston, who took the lead in Moisessiers absence, was knighted by the queen. Who would snub such fame, glory, and enduring legacy? At one point, the idea of competition, of the very race itself felt false. I have his response, fired from a slingshot onto the deck from a passing ship, to his correspondent with the London Times in 1969, carved into a hunk of varnished teak hanging above the nav station on my sailboat named after the very man who wrote it.
It reads, "parce que je suis heureux en mer et peut-être pour sauver mon âme."

(because I'm happy at sea and perhaps to save my soul)

So far, what the IBR has failed to quantify is our community's sacred, ne spiritual connection to this place. Everyday, we bask in awe of its bounty and beauty. What might have started out as curiosity, has evolved into lifestyles, livelihoods, and the deepest part of our lives for which no replacement can be found, bought, or compensated. The current draft of the IBR is an extinction level event for our unique way of life and a death sentence to our community.

However, still
Todd
I thank you

IBR Draft SEIS - RECORD #3162 DETAIL

First Name :	Valerie
Last Name :	Eliason
Attachments :	DSEIS_3162_Eliason_Original.pdf (57 kb)

IBR Draft SEIS - RECORD #3162 DETAIL

Submission Date :	11/18/2024
First Name :	Valerie
Last Name :	Eliason
Business/Organization/Agency :	Share Housing Case Manager

Submission Input :

I've been a tenant at the Normandy Apartments [redacted] in downtown Vancouver for nearly 4 years, and I've watched as the rent prices across Vancouver have steeply and steadily increased. The 1-bedroom & studio apartments in the Normandy building are some of the last affordable units in the area for residents.
As a housing case manager for Share, a nonprofit shelter & housing organization, I've been deeply concerned with the number of Clark County residents that are housing-insecure and at risk of becoming homeless. Washington currently has the sixth-highest rents in the nation, according to census data. Please don't take away the few affordable rental units we have left by demolishing the Normandy Apartments for the Interstate Bridge Replacement Program.

IBR Draft SEIS - RECORD #3163 DETAIL

First Name :	Sterling
Last Name :	McGarvey
Attachments :	DSEIS_3163_McGarvey_Original.pdf (2 kb)

IBR Draft SEIS - RECORD #3163 DETAIL

Submission Date : 11/18/2024
First Name : Sterling
Last Name : McGarvey
Business/Organization/Agency :

Submission Input :

I will admit that in the capacity of my life and work, it is difficult to absorb the entirety of the vast proposals on hand, but I feel that I have done my best and have been able to pick the areas where I feel that the analysis is effectively accounting for the effects of future transit expansion into a rapidly growing region.

With this in mind, I would like to comment in favor of a bridge redesign that provides a future for SW Washington to take more cars off the road through transit-friendly solutions. My hope is that as this long-needed repair finally commences, there are considerations for light rail to downtown Vancouver, which would significantly and positively impact transportation for the metro area.

In regard to tolling, I feel that the analysis should focus on peak commute hours in order to encourage both carpooling and encouraging transit usage in both directions. From what I am reading, this appears to be a component of the proposal, which I am pleased to see.

Based on what I'm seeing from a safety and traffic flow perspective from the studies, I'm leaning most heavily towards the Single Level Fixed Span to address this concern while managing vehicle safety across the Columbia River.

Having spent my childhood in the San Francisco Bay Area during the 1989 Loma Prieta Earthquake and knowing people who volunteered to pull bodies from rubble on the freeways and the collapsed Bay Bridge, the notion of a double deck bridge feels like an avoidable disaster if a crisis were to occur, and for this reason, I would like to see a solution that mitigates that scenario maximally.

For these reasons, I feel that an approach that is single-level, but high enough that bridge raises will not impact traffic flow, is the most ideal solution.

Thank you for your time and consideration.

IBR Draft SEIS - RECORD #3164 DETAIL

First Name :	Cecilia
Last Name :	Payne
Attachments :	DSEIS_3164_Payne_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #3164 DETAIL

Submission Date :	11/18/2024
First Name :	Cecilia
Last Name :	Payne
Business/Organization/Agency :	

Submission Input :

My suggestion with this Bridge Project should be like when we designed Pioneer Courthouse Square where they sold bricks to fund the square we now should be able to implement same type of buy system that can be incorporated into the bridge that will help Bridge Community and Industry together between the Oregon and Washington sides together and Beyond.

IBR Draft SEIS - RECORD #3165 DETAIL

First Name :	Hailey
Last Name :	Swalley
Attachments :	DSEIS_3165_Swalley_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #3165 DETAIL

Submission Date :	11/18/2024
First Name :	Hailey
Last Name :	Swalley
Business/Organization/Agency :	

Submission Input :

We strongly prefer two light rail stops at both Evergreen and Waterfront, which would make commute times substantially improve and reduce the need for travel both for work and entertainment in Portland. Please continue prioritizing light rail in the planning process.

IBR Draft SEIS - RECORD #3166 DETAIL

First Name :	Christopher
Last Name :	DeWalt
Attachments :	DSEIS_3166_DeWalt_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #3166 DETAIL

Submission Date : 11/18/2024

First Name : Christopher

Last Name : DeWalt

Business/Organization/Agency :

Submission Input :

Public transport, especially an express/direct rail line between Vancouver and downtown Portland, is necessary to accommodate the foreseeable metropolitan growth. De-prioritize car traffic. Prioritize public transportation. Another priority should be environmental conservation and wildlife protection. Beside the bridge is one of my favorite spots to birdwatch and enjoy the river; the first time I ever saw an osprey was down there. I've seen Egrets, Clark's Grebes, Bald Eagles, Rufous Sided Towhees, Pelagic Cormorants, American White Pelicans, Common Goldeneyes, Buffleheads, Greater Scaups, and more, and this project is an opportunity to not only protect the wildlife that makes our community beautiful but to terraform so that our commutes are greener AND more efficient. I STRONGLY URGE YOU to consider something similar to the floating wetlands that have been successful in Chicago and other cities.

IBR Draft SEIS - RECORD #3167 DETAIL

First Name :	Brittany
Last Name :	King
Attachments :	DSEIS_3167_King_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #3167 DETAIL

Submission Date :	11/18/2024
First Name :	Brittany
Last Name :	King
Business/Organization/Agency :	

Submission Input :

The proposed plan to remove the C Street ramps would require the tear down of the Normandy Apartments, which provides affordable rent. Removing the Normandy would displace many people already struggling to make ends meet in this economy and many do not have the means to make such a move. Please reconsider as this will negatively impact many people in an already struggling housing market.

IBR Draft SEIS - RECORD #3168 DETAIL

First Name :	Russell
Last Name :	Senior
Attachments :	DSEIS_3168_Senior_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #3168 DETAIL

Submission Date : 11/18/2024
First Name : Russell
Last Name : Senior
Business/Organization/Agency :

Submission Input :

My preference would be not to replace the Interstate Bridge at all. If it is going to collapse in a subduction zone earthquake, then let it collapse. People have coped with collapsed bridges before. There will be much less traffic after a major event anyway, and the Glenn Jackson can be used as a work around. I do NOT support expanded interchanges that are being piggybacked on the project. Long haul freight should not be on freeways ANYWAY. Nationalize the railways and operate them in the interest of shippers, not as monopolistic, vampiric fulcrums of control used to extract maximum profit for private railroad companies. I only support maintenance required to keep the existing structure functional. Congestion is natures way of encouraging people to stay home.

You will of course ignore these comments, because you have already decided what you want to do and whose pocket you want to line. But, perhaps these words will shame you in your dreams, and if you don't burn them, some future reader will consider how you might have taken a different path.

IBR Draft SEIS - RECORD #3169 DETAIL

First Name :	Lowell
Last Name :	Kissling
Attachments :	DSEIS_3169_Kissling_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #3169 DETAIL

Submission Date :	11/18/2024
First Name :	Lowell
Last Name :	Kissling
Business/Organization/Agency :	

Submission Input :

I think the planned project is vastly overscoped, costing billions more than is necessary to build an earthquake-resilient bridge, accommodate modern traffic patterns and meet environmental goals.
It relies on outdated traffic modeling that predicts skyrocketing traffic to justify extra lanes and 5 miles of highway widening. In reality, traffic on the bridge has flatlined in the past twenty years, as the Just Crossing Alliance has shown.

The only reason traffic may rise in the future is if we induce demand by building more lanes, incentivizing even more people to live further from urban centers with the misguided idea that they will be able to quickly drive to them.

IBR Draft SEIS - RECORD #3170 DETAIL

First Name :	Erik
Last Name :	Molander
Attachments :	DSEIS-3170_Molander_Original.pdf (3 mb)

IBR Draft SEIS - RECORD #3170 DETAIL

Submission Date :	11/19/2024
First Name :	Erik
Last Name :	Molander
Business/Organization/Agency :	
Attachments :	EPM IBR The 40 Mile Loop Connections.pdf (3 mb)

Submission Input :

Dear Mr. Johnson,

My name is Erik Molander and I am the prior Land Use Chair for the Bridgeton Neighborhood Association. My contact information is as follows:

Erik Molander
[redacted]

I have attached my comments on the connection of the 40 Mile Loop so as to better advance active transportation between and within the Columbia River Communities with an alternative I would like you to consider.

Sincerely,

Erik Molander

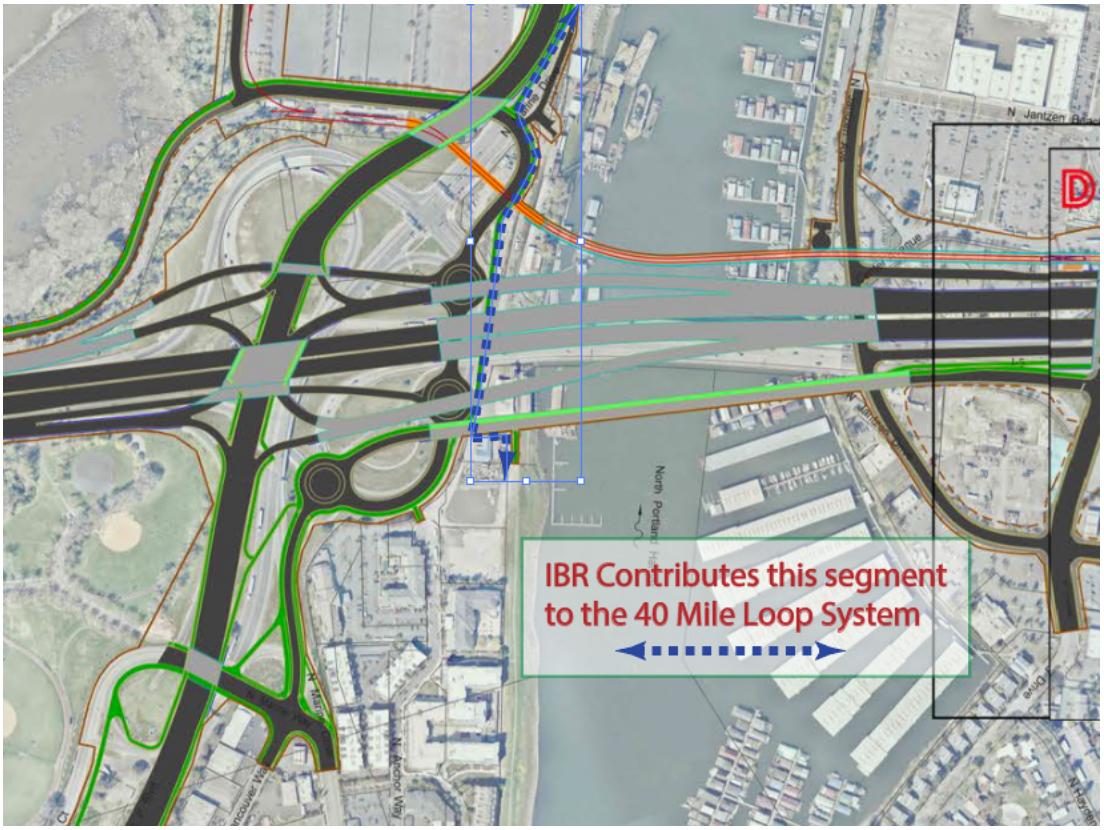
Comments on IBR Multi-Use path connections
to the 40-Mile Loop East/West Corridor

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.

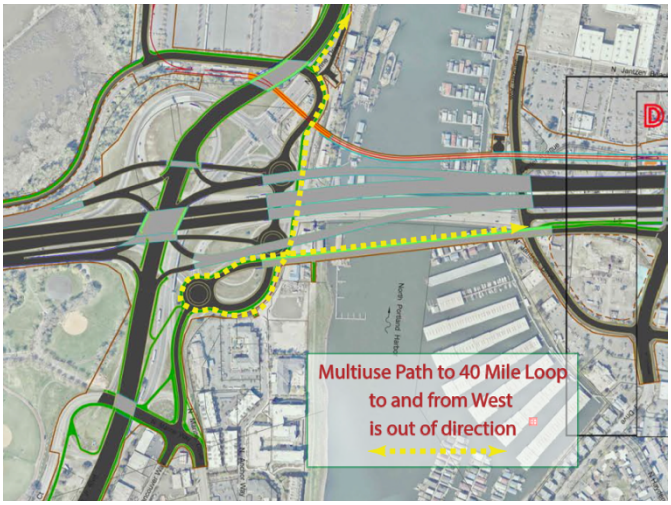
IBR Positive Contributions to the 40-Mile Loop Trail

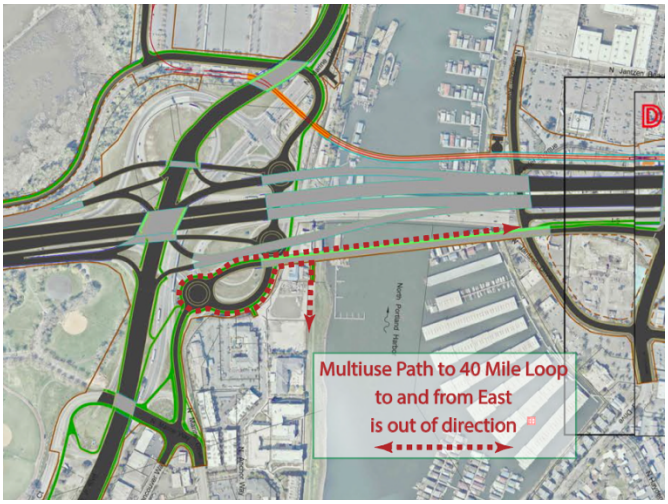
The IBR project will construct the segment of the 40-Mile Loop within the project area. This new trail segment will provide a safe, separated trail connecting the existing 40-Mile Loop trail located west of the proposed bridges through the project area, under the many new IBR bridges emanating from mainland 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,
Erik Molander

IBR Draft SEIS - RECORD #3171 DETAIL

First Name :	Erik
Last Name :	Molander
Attachments :	DSEIS-3171_Molander_Original.pdf (272 kb)

IBR Draft SEIS - RECORD #3171 DETAIL

Submission Date :	11/19/2024
First Name :	Erik
Last Name :	Molander
Business/Organization/Agency :	
Attachments :	EPM IBR West Side Mulituse Path.pdf (2 mb)

Submission Input :

Dear Mr. Johnson,

My name is Erik Molander and I am the prior Land Use Chair for the Bridgeton Neighborhood Association. My contact information is as follows:

Erik Molander
[redacted]

I have attached my comments on the location of the multi-use path with an alternative I would like you to consider.

Sincerely,

Erik Molander

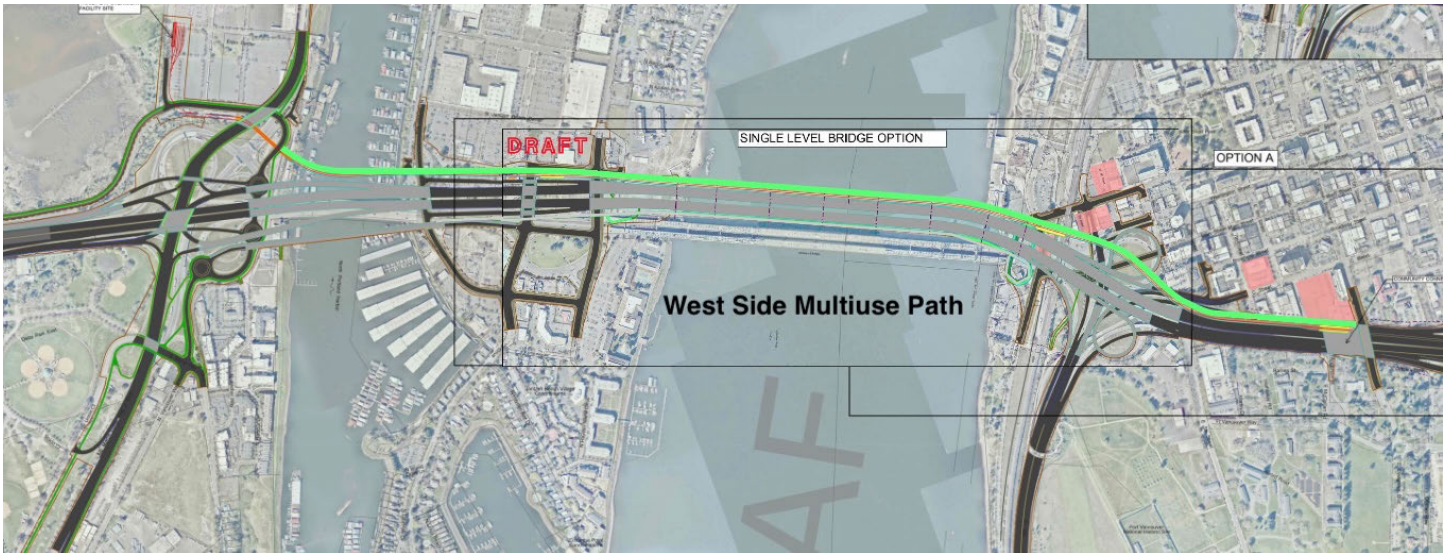
Erik Molander
[redacted]

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.

Erik Molander
[redacted]

• 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,
Erik Molander

IBR Draft SEIS - RECORD #3172 DETAIL

First Name :	Jordan
Last Name :	Boege
Attachments :	DSEIS_3172_ClarkCounty_Original.pdf (116 kb) image001.jpg (2 kb) Comment Letter - Interstate Bridge Replacement - Clark County Council.pdf (116 kb)

CLARK COUNTY WASHINGTON

clark.wa.gov

CLARK COUNTY COUNCIL
Gary Medvigy, Chair
Glen Yung, Michelle Belkot, Karen Dill Bowerman, Sue Marshall

1300 Franklin Street
PO Box 5000
Vancouver, WA 98666-5000
564.397.2232

November 18, 2024
Interstate Bridge Replacement Program
500 Broadway, Suite 200
Vancouver, WA 98660

Interstate Bridge Replacement Program Officials and Staff,

The Clark County Council wishes to provide the following comment on the program's Draft Supplemental Environmental Impact Statement:

1. The council has concerns about the IBR project as currently proposed, particularly the planned inclusion of light rail and IBR's approach to tolling. The projected costs of the IBR have only gone up since the project began, and it is likely that actual costs will exceed the current projections. The Council requests the project do everything in its power to reduce costs to minimize the impact to taxpayers. Clark County residents have on multiple occasions voted down light rail and removing light rail would also significantly reduce the cost of the bridge, reducing the burden on taxpayers and those paying tolls to cross the Columbia River.

2. IBR staff should do everything possible to reduce commute times and should emphasize bridge capacity as well as lane capacity to the extent possible on both sides of the river to promote the free flow of traffic.

3. An improved process would compare various bridge design options to a pared down and least cost bridge replacement option rather than a No-Build alternative. The Council recognizes the need for a bridge replacement, but instead of a No-Build alternative the IBR project should consider a set of alternatives that both do and do not include light rail.

4. The IBR project should do everything it can to minimize disruption and displacement of current residents and businesses; and to ensure that to the extent practicable the IBR hires and buys locally to mitigate the unavoidable economic disruptions that will come with a yearslong construction timeline.

5. While outside the scope of this project, the Council would like WSDOT to begin planning for future corridors across the Columbia River to meet the future demand. Two bridges are insufficient to meet the transportation needs that will arise from a growing population.

Sincerely,

Gary Medvigy
Council Chair, District 4

Glen Yung
Councilor, District 1

Michelle Belkot
Councilor, District 2

Karen Dill Bowerman
Councilor, District 3

CLARK COUNTY WASHINGTON

clark.wa.gov

CLARK COUNTY COUNCIL
Gary Medvigy, Chair
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1. The council has concerns about the IBR project as currently proposed, particularly the planned inclusion of light rail and IBR's approach to tolling. The projected costs of the IBR have only gone up since the project began, and it is likely that actual costs will exceed the current projections. The Council requests the project do everything in its power to reduce costs to minimize the impact to taxpayers. Clark County residents have on multiple occasions voted down light rail and removing light rail would also significantly reduce the cost of the bridge, reducing the burden on taxpayers and those paying tolls to cross the Columbia River.

2. IBR staff should do everything possible to reduce commute times and should emphasize bridge capacity as well as lane capacity to the extent possible on both sides of the river to promote the free flow of traffic.

3. An improved process would compare various bridge design options to a pared down and least cost bridge replacement option rather than a No-Build alternative. The Council recognizes the need for a bridge replacement, but instead of a No-Build alternative the IBR project should consider a set of alternatives that both do and do not include light rail.

4. The IBR project should do everything it can to minimize disruption and displacement of current residents and businesses; and to ensure that to the extent practicable the IBR hires and buys locally to mitigate the unavoidable economic disruptions that will come with a yearslong construction timeline.

5. While outside the scope of this project, the Council would like WSDOT to begin planning for future corridors across the Columbia River to meet the future demand. Two bridges are insufficient to meet the transportation needs that will arise from a growing population.

Sincerely,

Gary Medvigy
Council Chair, District 4

Glen Yung
Councilor, District 1

Michelle Belkot
Councilor, District 2

Karen Dill Bowerman
Councilor, District 3

IBR Draft SEIS - RECORD #3173 DETAIL

First Name :	Michael
Last Name :	Strahs
Attachments :	DSEIS-3173_Strahs_Original.pdf (11 kb)

IBR Draft SEIS - RECORD #3173 DETAIL

Submission Date :	11/18/2024
First Name :	Michael
Last Name :	Strahs
Business/Organization/Agency :	Jantzen Beach Center

Submission Input :

Dear Interstate Bridge Replacement Program:

I am writing to submit public comment and questions regarding the Draft SEIS on behalf of Jantzen Beach Center 1767 LLC, the owner of the Jantzen Beach Center, the open-air retail shopping center on Hayden Island just west of the current and planned replacement I-5 bridges. The vitality of the Jantzen Beach Center depends on smooth, efficient access from Portland and Vancouver bringing vital connections to jobs and services to the island.

As you may or may not know, we remain concerned about the complicated configuration of the Marine Drive interchange and encourage the program to incorporate the necessary wayfinding signage for vehicles to successfully and easily navigate the multiple roundabouts for access to and from the arterial bridge to the island from the Portland side of the river.

We understand the program is studying both fixed and moveable span bridge design options. We wish to register our opposition to a moveable span, as it would fail to adequately address the major congestion issues in the corridor resulting from intermittent bridge lifts, while adding significant cost to the project.

We would also like to note our strong support for the extension of the light rail across the river including the installation of a new transit station on Hayden Island. This will support greater access to the island and seed future transit-oriented development on our property and beyond.

Although we realize tolling rates do not fall within the scope of the DSEIS, we think it is important to acknowledge that high tolls could dissuade Washington residents from crossing the bridge to access retail options on Hayden Island, impacting jobs and the vitality of our shopping center. We recognize that tolling is an important and necessary component of the finance plan for the bridge project and hope that its revenue needs can be met while avoiding the highest of the tolling rates under consideration.

Our most crucial comment is that every attempt should be made to avoid modifying or eliminating any access, circulation or parking or adding impediments in the way of customers and visitors to our shopping center and its many businesses during the construction and subsequent operations of the new I-5 bridge.

We also have open questions about the project for which we have been unable to find answers in the body, appendices and technical reports of the DSEIS. Specifically, we would like the Interstate Bridge Replacement Program to address the following:

* The Acquisitions Technical Report notes in Section 4.3.2 (p. 90/138) that "One business within the Jantzen Beach Center would be impacted." The Report does not identify which business is being referenced. Please

clarify.

* The Acquisitions Technical Report notes in Section 5.2.2 (p. 101/138) that a temporary construction easement will "need to be acquired from... a vacated restaurant site in the Jantzen Beach Center." The Report does not specify which vacated restaurant site in the Jantzen Beach Center is being referenced. Please clarify.

* The Acquisitions Technical Report's Appendix Table A2 (p. 114/138) lists tax lot numbers for at least 3 parcels within the Jantzen Beach Center:

? IBR ID# 2N1E33 00100, listed as being located at 1555 N TOMAHAWK IS DR, is identified as a "Partial" taking, with 6075 sf shown as a "Permanent Impact" and 157010 sf (3.60 acres) shown as a "Temporary Construction Impact" - but there is no way to tell where on this very large 2,447,829 sf (56.19 acre) parcel these studied impacts are located. The Appendix B map (p. 132/138) also only identifies the parcel. In order to understand what was studied and comment responsibly on their impacts, we need to understand where these areas of permanent and temporary construction impacts are located. Please identify these areas more specifically and the methodologies used to select them, as well as how these areas are intended to be used by the IBR program.

? IBR ID# 2N1E33D 00600, listed as being located at 12045 N PARKER AVE, is also identified as a "Partial" taking, with 7511 sf shown as a "Permanent Impact" and 63918 sf (1.47 acres) shown as a "Temporary Construction Impact" - but here too there is no way to tell where on this large 339061 sf (7.78 acre) parcel these studied impacts are located. The Appendix B map (p. 132/138) also only identifies the parcel. In order to understand what was studied and comment responsibly on their impacts, we need to understand where these areas of permanent and temporary construction impacts are located. Please identify these areas more specifically and the methodologies used to select them, as well as how these areas are intended to be used by the IBR program.

? IBR ID# 2N1E34C 00400, listed as being located at 12300 N PARKER AVE, is identified as a "Full" taking. Please identify how this area will be used by the IBR program.

* The Acquisitions Technical Report's Figure B-2 ("Property Impacts - Hayden Island", p. 132/138) uses an outdated underlying satellite image that pre-dates the current configuration of the buildings at the Jantzen Beach Center. For example, the Target store is not shown. This is confusing and should be corrected.

Considering the issues itemized above, we urge the program to avoid or minimize takings from our property as these actions will have a significant impact on the vitality and functioning of the Jantzen Beach Center, and result in significant severance damages.

I was a member of the Hayden Island/Marine Drive Community Working Group earlier in the process and I continue to serve on the Community Benefits Advisory Group. Our company appreciates the ongoing opportunity to engage constructively with the program to shape the future of the project.

Jantzen Beach Center 1767 LLC reserves all rights and we thank you in advance for your attention to our concerns.

Sincerely,

Michael Strahs
As Authorized Agent for Jantzen Beach Center 1767 LLC

Michael Strahs
Vice President | Development

KRC Property Management I, Inc., a subsidiary of

[cid:image001.png@01DB39DA.9375B460]

[redacted]
15 Southgate Ave, Suite 201 | Daly City, CA 94015
kimcorealty.com<https://www.kimcorealty.com/>

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IBR Draft SEIS - RECORD #3174 DETAIL

First Name :	Valerie
Last Name :	Eliason
Attachments :	DSEIS-3174_Eliason_Original.pdf (6 kb)

IBR Draft SEIS - RECORD #3174 DETAIL

Submission Date :	11/18/2024
First Name :	Valerie
Last Name :	Eliason
Business/Organization/Agency :	Housing First Case Manager - Affordable Housing and Stability Program

Submission Input :

Hello,
I've been a tenant at the Normandy Apartments ([redacted]) in downtown Vancouver for nearly 4 years, and I've watched as the rent prices across Vancouver have steeply and steadily increased. The 1-bedroom & studio apartments in the Normandy building are some of the last affordable units in the area for residents.
As a housing case manager for Share, a nonprofit shelter & housing organization, I've been deeply concerned with the number of Clark County residents that are housing-insecure and at risk of becoming homeless. Washington currently has the sixth-highest rents in the nation, according to census data. Please don't take away the few affordable rental units we have left by demolishing the Normandy Apartments for the Interstate Bridge Replacement Program.

Valerie Eliason (She/Her/Hers)

Housing First Case Manager

Affordable Housing and Stability Program

Work Cell: [redacted]

Share's Mission:

Share believes every person counts. Together we pursue a stronger community by building relationships, advocating for equitable access to housing and food stability while empowering every individual to grow and thrive.

The information contained in this transmission may contain privileged and/ or confidential information, including patient information protected by federal and state privacy laws. It is intended only for the use of the person(s) named above. If you are not the intended recipient, you are hereby notified that any review, dissemination, distribution, or duplication of this communication is strictly prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message.

IBR Draft SEIS - RECORD #3175 DETAIL

First Name :	Thomas
Last Name :	Hickey
Attachments :	DSEIS-3175_Hickey_Original.pdf (646 kb)

IBR Draft SEIS - RECORD #3175 DETAIL

Submission Date :	11/18/2024
First Name :	Thomas
Last Name :	Hickey
Business/Organization/Agency :	
Attachments :	Comments Bridge Architecture.pdf (120 kb)

Submission Input :

**

Interstate Bridge Replacement Program

*

Via email ? draftseis@interstatebridge.org
<mailto:draftseis@interstatebridge.org>

Dear IBR team,

I appreciate all of the hard work that has gone into designing and presenting the Draft SEIS to the public, and I wish you well in analyzing and assimilating all of the comments.

This document from the Bridgeton Neighborhood Association accurately expresses the issue at hand. It is important that the aesthetics of the bridge design be a consideration from the beginning, not overlaid over the finalized project at the end.

Yours,

Tom Hickey

North Portland advocate

IBR CAG; IBR Community Benefits Group

[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

IBR Draft SEIS - RECORD #3176 DETAIL

First Name :	Arvia
Last Name :	Morris
Attachments :	DSEIS-3176_Morris_Original.pdf (5 kb)

IBR Draft SEIS - RECORD #3176 DETAIL

Submission Date : 11/18/2024
First Name : Arvia
Last Name : Morris
Business/Organization/Agency :

Submission Input :

To Program Administrator Gregory Johnson,

The intestate bridge replacement (IBR) is a high priority project for Oregon and Washington to replace the aging Interstate Bridge with a modern, seismically resilient structure. In this region, the IBR is the largest transportation investment in half a century necessitating that it meet the mobility justice, economic and environmental challenges of today and into the next century.

Climate change and population growth will create major challenges for the region going forward. To date Washington has not been able to maintain its freeway system and thus needs to be building infrastructure which moves us away from more dependence on individual cars for moving people goods and services. The new bridge should have more emphasis on the use of transit, buses, rail and pedestrian access. In the current design the pedestrian amenities are along side noisy traffic and will not encourage other modes of travel besides cars.

The IBRP needs to have specific vehicle miles traveled (VMT) reduction goals achieved with an emphasis on bus and rail transit. Widening the bridge to more traffic lanes is a big expensive step in the wrong direction.

Thank you for considering my view. I look forward to reviewing alternate designs which do not include freeway expansion.

Sincerely,

Arvia Morris
Climate and environmental Advocate
[redacted]

IBR Draft SEIS - RECORD #3177 DETAIL

First Name :	Dave
Last Name :	White
Attachments :	DSEIS-3177_White_Original.pdf (9 kb) image001.png (962 kb) image002.jpg (332 bytes)

IBR Draft SEIS - RECORD #3177 DETAIL

Submission Date : 11/18/2024
First Name : Dave
Last Name : White
Business/Organization/Agency :

Submission Input :

You are welcome. We don’t want or need tolls. The interstate is already paid for. The state is flush with money with the bad carbon tax.

From: Draft SEIS [mailto:draftseis@interstatebridge.org]
Sent: Monday, November 18, 2024 4:41 PM
To: Dave White <[redacted]>
Subject: RE: White v. Ashford, et al. 24-6787 - 003 - Opening Brief Submitted for Filing

Thank you for sharing your comments on the Interstate Bridge Replacement (IBR) Program Draft Supplemental Environmental Impact Statement (SEIS).?The public comment period is taking place from September 20th through November 18th.

Sincerely,

IBR Team

From: Dave White <[redacted]> >
Sent: Monday, November 18, 2024 4:27 PM
To: Dave White <[redacted]> >
Subject: White v. Ashford, et al. 24-6787 - 003 - Opening Brief Submitted for Filing
Importance: High

You don't often get email from [redacted]
<[redacted] > . Learn why this is important
<https://aka.ms/LearnAboutSenderIdentification>

Appellant Dave White filed this opening appeal brief in the complaint against Oregon State University Engineering, The textbook they are using for Environmental science is not one by definition. Sustainability is an untruthful statement of the UN. Any questions please call 503-608-7611

From: <mailto:ACMS@ca9.fedcourts.us> ACMS@ca9.fedcourts.us [<mailto:ACMS@ca9.fedcourts.us> mailto:ACMS@ca9.fedcourts.us]
Sent: Thursday, November 14, 2024 9:48 AM
To: <[redacted]
Subject: White v. Ashford, et al. 24-6787 - 003 - Opening Brief Submitted for Filing

NOTE TO PUBLIC ACCESS USERS Judicial Conference of the United States policy permits attorneys of record and parties in a case (including pro se litigants) to receive one free electronic copy of all documents filed electronically, if receipt is required by law or directed by the filer. PACER access fees apply to all other users. To avoid later charges, download a copy of each document during this first viewing.

United States Court of Appeals for the Ninth Circuit

Notice of Docket Activity

The following transaction was entered on 11/14/2024 9:44:49 AM PST and filed on 11/14/2024

Case Name: White v. Ashford, et al.

Case Number: <https://ca9-showdoc.azurewebsites.us/24-6787> 24-6787

Docket Text:

OPENING BRIEF submitted for filing by Appellant David White. [Entered: 11/14/2024 09:46 AM]

Document: <https://ca9-showdoc.azurewebsites.us/NDA/56979687-b0a2-ef11-8a6a-001dd8082f2d> Brief

Notice will be electronically mailed to:

David White ; <[redacted]
J. Michael Porter ; <[redacted]

Case participants listed below will not receive this electronic notice:

EV’s crash the grid and wont lower carbon dioxide for 150 years!

The only worldwide manuscript for netzeroco2e presented at Plenary Addresses at Climate Change conferences. <https://cctruth.org/the-essential-role-of-photosynthesis-in-defining-net-zero-carbon-dioxide-emissions-for-equilibrium-calculations.pdf%20cctruth.org> https://cctruth.org/the-essential-role-of-photosynthesis-in-defining-net-zero-carbon-dioxide-emissions-for-equilibrium-calculations.pdf cctruth.org We only have 8.6 billion tons of photosynthesis left in the world.

IBR Draft SEIS - RECORD #3178 DETAIL

First Name :	Jason
Last Name :	Hoover
Attachments :	DSEIS-3178_Hoover_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #3178 DETAIL

Submission Date : 11/18/2024
First Name : Jason
Last Name : Hoover
Business/Organization/Agency :

Submission Input :

Draft SEIS Public Comment

Dear Interstate Bridge Replacement Program,

The following are my comments, questions, and constructive feedback for the 2024 Draft SEIS of the Interstate Bridge Replacement Program. I forgot to include these comments with my first email earlier.

Thank you,

Jason Hoover

Jason Hoover
Address: [redacted]
Phone: [redacted]
Email: [redacted]

Draft SEIS Public Comment

Where I wrote “Top Priority” means these are my top feedback, questions, and comments for the Interstate Bridge Replacement Program.

Interstate 5 at Evergreen - Top Priority

Did the Interstate Bridge Replacement Program discuss the replacement of the Evergreen overpass as a freeway lid? There was talk during the past about joining the Vancouver Historic Area with Downtown Vancouver by building a freeway lid at Evergreen. Is this correct? If this overpass gets rebuilt, why not build a freeway lid? This will help mitigate the project through many different ways.

First, if a freeway lid/park over Interstate 5 at Evergreen is built, then the historic area could rejoin the Downtown Vancouver, again. When Interstate 5 was built, this divided these two areas and a freeway lid would be great for this area.

Next, if a freeway lid could be built at Evergreen, then a new park could be built on top of the lid to help mitigate with greenhouse gases, noises, etc. The Interstate Bridge Replacement Program could build a park with the

City of Vancouver on this freeway lid. There could be trees, plants, water, etc for local citizens and visitors to enjoy. Residents and visitors could easily walk back and forth between the historic and downtown areas. The trees, plants, water, etc. would help mitigate noise and greenhouse gases. This would help with curbing global warming. If the City of Vancouver is not ready to take on another park, the Interstate Bridge Replacement Program could just build the lid. When the City of a Vancouver is ready, the city could build the park.

Third, a freeway lid at Evergreen would help with the Evergreen Light Rail station and C-Tran's Vine especially if a park and plaza is built on the freeway lid. This would attract residents and visitors to this park and they could enjoy the park/ plaza before or after they ride transit. The city could even put vendors there, too. Furthermore, by building a park/plaza on the freeway lid this would discourage crime around the light rail station because area residents and visitors would enjoy the area.

Environmental Features of the Interstate Bridge Replacement Program - Top Priority

First, I hope the Interstate Bridge Replacement Program will have modern up to date lightening … no dark areas. Hopefully the project will have a lot of lights and the pathways will have enough lights for pedestrians and bicyclists, too. Also, I hope the bridge comes with modern LED lighting where we can change the colors throughout the season similar to Tri-Met's new bridge over the willamette River.

Next, I hope this project has elements where electricity is created to support the project such as solar and wind. For example, the project could build solar panels to support sign boards and other electrical functions of the project area.

Finally, I hope there will be enough trees, plants, maybe even water features, etc. added to the project. A great start would be that freeway lid I mentioned above with a park and plaza area on top of the lid at Evergreen!

Thank you for reading my constructive feedback, questions, and comments for the 2024 Draft SEIS of the Interstate Bridge Replacement Program. This email is my second email and response. I forget to include this feedback with my first response.

Have a great day!

Jason Hoover

Jason Hoover
Address: [redacted]
Phone: [redacted]
Email: [redacted]

IBR Draft SEIS - RECORD #3179 DETAIL

First Name :	Thomas
Last Name :	Hickey
Attachments :	DSEIS-3179_Hickey_Original.pdf (180 kb)

IBR Draft SEIS - RECORD #3179 DETAIL

Submission Date :	11/18/2024
First Name :	Thomas
Last Name :	Hickey
Business/Organization/Agency :	
Attachments :	Synergies Empowered by the IBR.pdf (176 kb)

Submission Input :

**

Interstate Bridge Replacement Program

*

Via email ? draftseis@interstatebridge.org
<mailto:draftseis@interstatebridge.org>

Dear IBR team,

I appreciate all of the hard work that has gone into designing and presenting the Draft SEIS to the public, and I wish you well in analyzing and assimilating all of the comments.

This document from the Bridgeton Neighborhood Association accurately expresses the issue at hand. I would add to their example the need to find the opportunity to develop public water access for non-motorized vehicles (paddle boards, canoes, kayaks, etc.) in the North Portland Harbor through coordination with the City of Portland and the USACE levee upgrade project.

Yours,

Tom Hickey

North Portland advocate

IBR CAG; IBR Community Benefits Group

[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**

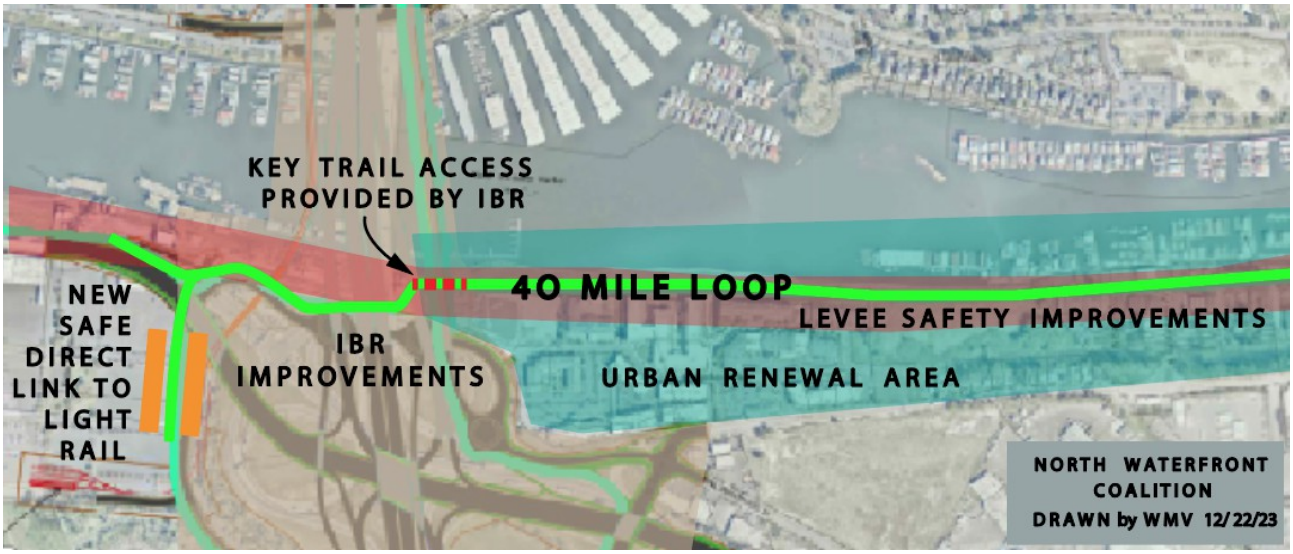
1) IBR Road system requires acquisition of property in order to build the new Harbor Bridges. That property under the new bridges finally puts into public ownership a key missing trail segment of the 40 Mile Loop.

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

IBR Draft SEIS - RECORD #3181 DETAIL

First Name :	Diane
Last Name :	NA
Attachments :	DSEIS-3181_NA_Original.pdf (1 kb) grasshopper_+13603565362_11_19_2024_003640426.mp3 (470 kb)

IBR Draft SEIS - RECORD #3181 DETAIL

Submission Date : 11/18/2024

First Name : Diane

Last Name : NA

Business/Organization/Agency :

Submission Input :

"Yes, I'd like to leave a comment for the draft supplemental. My name is Diane, and I understand the cost of the bridge cost evaluation has gone up like over 50% from the start. I think it's about 7.8 billion and then a report on what current update has not been released. I don't know why not. But I've heard that it may be as high as 9 billion. So how transparent can we be on that? OK. And then, sure wish I had more time to read it. The seismic, that issue, earthquake, what company evaluated that? And then a third, I live in the Smith Tower. What can we look at as far as height of the approach to the bridge? And yeah, I'm on 10th floor, so what are we going to be blocked with? What else? Well how come if during the CRC there wasn't enough height clearance for the bridge over the Coast Guard and so how is it that we could have that not be a problem now? What is the height clearance changed? Where does the money, the federal money come from? What pie are they taking it from? Is it the Affordable Care Act or?"

IBR Draft SEIS - RECORD #3182 DETAIL

First Name :	Douglas
Last Name :	Miller
Attachments :	DSEIS-3182_Miller_Original.pdf (6 kb)

IBR Draft SEIS - RECORD #3182 DETAIL

Submission Date : 11/18/2024
First Name : Douglas
Last Name : Miller
Business/Organization/Agency :

Submission Input :

First Name:
Douglas

Last Name:
Miller

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
No more moving people singularly (by cars) unless required and greatly increase the use of mass transit mostly by rail by increasing the train frequency and duration(throughout the night). Rail stops to be 3-4 miles apart to meet busses for intermediate pickups! Continue using the I5 bridges add train bridge let Vancouver live with the growing traffic jambs and build their own mass transit!

JCA comment #: 873

IBR Draft SEIS - RECORD #3183 DETAIL

First Name :	Mary
Last Name :	Lewis
Attachments :	DSEIS-3183_Lewis_Original.pdf (2 kb)

IBR Draft SEIS - RECORD #3183 DETAIL

Submission Date : 11/18/2024
First Name : Mary
Last Name : Lewis
Business/Organization/Agency :

Submission Input :

This article states the best option for the crossing(s) of the Columbia River:
cascadepolicy.org/transportation/replacing-the-i-5-interstate-bridge-is-not-a-solution-for-anything/

Excerpt from the article succinctly states a solution for this contested crossing:

The Interstate Bridge should be left alone for now, and ODOT should be directed to start planning for two new bridges – one upstream from the Glenn Jackson I-205 Bridge, and one downstream from the I-5 Interstate Bridge. The new crossings would eliminate most congestion on the existing bridges, while providing essential redundancy in the event of a catastrophic earthquake.

We especially need a new Columbia River bridge with a direct connection to Highway 26 near Hillsboro. Not only would this reduce the total amount of driving for thousands of Westside motorists – who now have to drive to Portland just to get to Vancouver – it would provide much-needed congestion relief at three current bottlenecks: the Sylvan hills tunnels on HW 26, the Fremont Bridge, and I-5 in North Portland.

Planners and their political allies seem to be missing a central truth about river-based cities: they need lots of bridge crossings. In downtown Portland, we have two interstate highway bridges over the Willamette River, plus many local crossings including the Burnside, Steel, Morrison and Hawthorne bridges.

Each crossing serves a market and is necessary for the proper functioning of the city. If we applied ODOT’s logic for the IBRP, we’d tear down all the local Willamette River bridges and just keep the Marquam and Fremont Bridges.

Of course, we’re not going to do that because it would be insane. But it’s considered brilliant planning for the Columbia River.

IBR Draft SEIS - RECORD #3184 DETAIL

First Name :	Kathryn
Last Name :	Doherty-Chapman
Attachments :	DSEIS-3184_DohertyChapman_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #3184 DETAIL

Submission Date : 11/18/2024
First Name : Kathryn
Last Name : Doherty-Chapman
Business/Organization/Agency :

Submission Input :

First Name:
Kathryn

Last Name:
Doherty-Chapman

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
Im concerned that the current design does not meet the needs of people walking, biking or rolling. connectivity, level of stress/comfort, safety, and operations and maintenance.

This is especially concerning because the current design does little to reduce auto travel, estimating a 62% increase in study-area miles we drive (aka vehicle miles traveled or 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 carbon reduction goals.

There needs to be distinct separation of walk/bike/roll corridors from freight routes reduces conflicts between these two user groups. For example, the current design for the ramp from Vancouver Way to MLK North poses significant conflict with freight, as the proposed route travels down, across, and back up a freight-heavy on-ramp.

Also the comfort and safety needs of people using active transportation must be properly addressed with lighting, climate and shade issues, and personally safety and security concerns. We want people to Want to use these facilities!

Also 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.

Finally Equity and tolling in the I-5 Corridor is not a matter of if, but when. For this reason, I strongly suggest that regardless of which state manages the IBR toll program that implementation is in accordance with ODOT Equity and Mobility Advisory Committee's Low Income Toll Program, and so that the project enhances rather harms access and mobility for low-income and BIPOC communities. Also please don't use equity concerns as an excuse to NOT toll. You know there's an equitable way to do it, so do it.

JCA comment #: 872

IBR Draft SEIS - RECORD #3185 DETAIL

First Name :	Hayes
Last Name :	Guay
Attachments :	DSEIS-3185_Guay_Original.pdf (6 kb)

IBR Draft SEIS - RECORD #3185 DETAIL

Submission Date : 11/18/2024
First Name : Hayes
Last Name : Guay
Business/Organization/Agency :

Submission Input :

First Name:
Hayes

Last Name:
Guay

Business or Organization:
www.columbiasprings.org

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
The main concern I wanted to voice as a community member is this - if a new bridge is to be put in, it should

prioritize all transportation, not just automobiles - those walking, biking, using strollers or wheelchairs, should have a safe and comfortable path alongside other uses. These paths should be connected to other popularly used paths to help commuters like myself and the many volunteers and community members I work with in Vancouver. The next biggest concern I want to voice is the about the environmental impact of installing new infrastructure. As a part of the Columbia River Watershed Alliance, and as a passionate steward of salmon, I strongly believe this project should put environmental impacts as a forefront of thought throughout the process. We have an opportunity here to show other states and agencies how to improve human lives without damaging non-human lives; I hope community members like myself can have their voice heard in this process.

JCA comment #: 871

IBR Draft SEIS - RECORD #3186 DETAIL

First Name :	Kyle
Last Name :	Herrlinger
Attachments :	DSEIS-3185_Herrlinger_Original.pdf (6 kb)

IBR Draft SEIS - RECORD #3186 DETAIL

Submission Date : 11/18/2024
First Name : Kyle
Last Name : Herrlinger
Business/Organization/Agency :

Submission Input :

First Name:
Kyle

Last Name:
Herrlinger

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
I am incredibly excited for the light rail addition. I enjoy using public transportation, and the addition of a light rail from Vancouver to Portland would make my commute much easier. The light rail will make it easier for people who cannot afford cars to travel to and from home/work every day, and will be a huge boost to the Vancouver and Hayden Island economy.

JCA comment #: 870

IBR Draft SEIS - RECORD #3187 DETAIL

First Name :	Dianne
Last Name :	Ensign
Attachments :	DSEIS-3187_Ensign_Original.pdf (5 kb)

IBR Draft SEIS - RECORD #3187 DETAIL

Submission Date : 11/18/2024
First Name : Dianne
Last Name : Ensign
Business/Organization/Agency :

Submission Input :

First Name:
Dianne

Last Name:
Ensign

Email:
[redacted]

Topic Area:
Induced Demand

Comment:
More lanes will lead to more traffic. Replace the bridge without adding more lanes, to reduce the environmental impact.

JCA comment #: 869

IBR Draft SEIS - RECORD #3188 DETAIL

First Name :	Marti
Last Name :	Moody
Attachments :	DSEIS-3188_Moody_Original.pdf (2 kb)

IBR Draft SEIS - RECORD #3188 DETAIL

Submission Date : 11/18/2024
First Name : Marti
Last Name : Moody
Business/Organization/Agency :

Submission Input :

We are strongly against these tolls!!! We highly resent you going around we voters “again” and forcing this outrageous horrible tax on us. We are in Oregon City and l) it won’t fix the problem with traffic, and 2) we have not choice but to use the hwy many times a day!! Burden on us in completely wrong and unfair. My gosh, stop spending money like you have (it’s ours) and please start making decisions with outcomes that meet the need. Did this last election teach you anything. We are sick and tired of it. We know we are on deaf ears!!!!! You just want our money that we worked our whole lives for!!!! STOP

ODOT, WADOT, and Governor Kotek are moving forward with plans for a new, but no bigger, Interstate Bridge over the Columbia river.
Just 11 months ago the IBR project director Greg Johnson told us the bridge would cost $6B. Today's estimate is $9B and rising. While we admit construction costs are up - they are not up 50% in just ONE year!
Less than HALF that cost is already lined up. Oregon, Washington, and the Federal government have already chipped in.
The answer ... tolls on the backs and from the wallets of those who cross the bridge. The toll share was $1.5B last year, now tolling's share is up 300% to $4.5B currently and tolls will continue to be the "subtract answer" plugging the funding gap as project costs continue to rise.

IBR Draft SEIS - RECORD #3189 DETAIL

First Name :	Nancy
Last Name :	Reed
Attachments :	DSEIS-3189_Reed_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #3189 DETAIL

Submission Date :	11/18/2024
First Name :	Nancy
Last Name :	Reed
Business/Organization/Agency :	

Submission Input :

W we the people are adamantly opposed to tolling of our roads and bridges

Sent from my iPhone

IBR Draft SEIS - RECORD #3190 DETAIL

First Name :	Kyle
Last Name :	Herrlinger
Attachments :	DSEIS-3190_Herrlinger_Original.pdf (6 kb)

IBR Draft SEIS - RECORD #3190 DETAIL

Submission Date : 11/18/2024
First Name : Kyle
Last Name : Herrlinger
Business/Organization/Agency :

Submission Input :

First Name:
Kyle

Last Name:
Herrlinger

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
Designs of the new bridge have inconvenient connections at the North and South ends. At the North end, bikers and pedestrians are forced to walk up a half mile long corkscrew that will surely deter people from using it. At the South end, the path becomes convoluted and hard to navigate as you leave the bridge entering into Portland. Both of these issues put bikers and pedestrians at a disadvantage, and makes the commute more challenging and difficult for people like me who ride the bridge multiple times a week. If a large part of the

bridge replacement is to decrease traffic and commute times, every possible incentivize to ride bikes, walk, or take public transportation across should be taken. The multi-use path should not be difficult to navigate or access, and I am deeply concerned that the current design makes no real effort to incentivize use. Why is the multi-use pathway so convoluted and made with design aspects that will deter people from using it?

JCA comment #: 868

IBR Draft SEIS - RECORD #3191 DETAIL

First Name :	N/A
Last Name :	livingmylife
Attachments :	DSEIS-3191_livingmylife_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #3191 DETAIL

Submission Date : 11/18/2024

First Name : N/A

Last Name : livingmylife

Business/Organization/Agency :

Submission Input :

Dear Sirs, Please hear what I want to say about tolling. I live in Oregon City and I am a 3 year retired 69 year old, I use all the roads mentioned above sometimes daily as all my Doctors and my Dentists are out of Oregon City and I use 205 and I-5 to get to their offices.I already pay over the top property taxes and Oregon City Utilities. If these tolls go through I'm not going to be able to pay any amount for the use of these roads. And therefore will not be able to access my health care.The state of Oregon and Oregon City are not senior friendly and are pricing us out of our homes and communities.

IBR Draft SEIS - RECORD #3193 DETAIL

First Name :	Carol
Last Name :	Risen
Attachments :	DSEIS-3193_Risen_Original.pdf (6 kb)

IBR Draft SEIS - RECORD #3193 DETAIL

Submission Date : 11/18/2024
First Name : Carol
Last Name : Risen
Business/Organization/Agency :

Submission Input :

Thank you for your diligent attention to this matter of polling. I have your petitions but they are only half filled out. I can send back what I presently have and continue to collect signatures if you like. Or wait till they are all filled out. Got temporarily waylaid by some other urgent matters, and of course ODOT is counting on us becoming distracted. So let me know if I should mail back the signatures which I currently have gotten or continue collecting more. Thanks for your urgent and important work!

Carolyn Risen
[redacted]

IBR Draft SEIS - RECORD #3194 DETAIL

First Name :	Allison
Last Name :	Abell
Attachments :	DSEIS-3194_Abell_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #3194 DETAIL

Submission Date : 11/18/2024
First Name : Allison
Last Name : Abell
Business/Organization/Agency :

Submission Input :

First Name:
Allison

Last Name:
Abell

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
I request the integration of active transportation with adequate access and safety for individuals who will be walk, roll, or cycle across the bridge. Integration with existing active transportation is critical to making the new bridge design effective for people using all types of transportation.

JCA comment #: 866

IBR Draft SEIS - RECORD #3195 DETAIL

First Name :	Jonathan
Last Name :	Rapaport
Attachments :	DSEIS-3195_Rapaport_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #3195 DETAIL

Submission Date : 11/18/2024
First Name : Jonathan
Last Name : Rapaport
Business/Organization/Agency :

Submission Input :

First Name:
Jonathan

Last Name:
Rapaport

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
I am commenting to support the Just Crossing Alliance's positon on rejecting a massive highway expansion and creating a right-sized bridge between portland and vancouver. an expanded freeway would be destructive and more road capacity is unnecessary and encourages car use when we should be creating better public transit connections. I also urge that light rail staions in vancouver be large enough for four car trains and that support is directed toward the MAX downtown tunnel project, which would create the capacity needed to make the

vancouver light rail extension more frequent and convenient.

JCA comment #: 865

IBR Draft SEIS - RECORD #3196 DETAIL

First Name :	Sue
Last Name :	Fry
Attachments :	DSEIS-3196_Fry_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #3196 DETAIL

Submission Date : 11/18/2024
First Name : Sue
Last Name : Fry
Business/Organization/Agency :

Submission Input :

First Name:
Sue

Last Name:
Fry

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
Re: the proposals for Columbia River crossing—
As a Portland resident who travels between Portland and Seattle, I'm concerned about the volume of large semis on the route. Particularly going over the river, it would be nice to have a dedicated truck lane to reduce some of the serious congestion other users face.

Also of importance to me are accommodations for travelers other than those in cars or busses. Please consider bicyclists and pedestrians in the bridge design process.

And finally, either build another drawbridge or make the new one high enough that most ships using the river can pass underneath! That seems like common sense to me…

Thank you—

JCA comment #: 863

IBR Draft SEIS - RECORD #3197 DETAIL

First Name :	Mi
Last Name :	M
Attachments :	DSEIS-3197_M_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #3197 DETAIL

Submission Date : 11/18/2024

First Name : Mi

Last Name : M

Business/Organization/Agency :

Submission Input :

The IBR, if built, will have enormous detrimental effects to people and the environment.

It will increase car traffic capacity, thereby stopping regional climate goals. And a new $7.5 billion bridge is useless if climate change decimates the population. Many experts, including USGS's climate modelers, project that basin wide Columbia River flood events, due to climate change, will cause catastrophic effects. Relatedly, the draft SEIS does not adequately address this.

Our family supports the No-build option. The existing bridge can be improved at a FAR LESSER cost than the other alternatives. This would also eliminate vehicle tolls, which are unfair to those of us with limited means.

IBR Draft SEIS - RECORD #3198 DETAIL

First Name :	Kristin
Last Name :	Woods
Attachments :	Columbia Waterfront_Original.pdf (3 mb) Comments_on_the_Interstate_Bridge_Replacement_Supp_EIS_111824.pdf (3 mb)

GRAMOR
DEVELOPMENT

Via US mail and e-mail: DraftSEIS@interstatebridge.org

November 18, 2024

IBR Program Draft SEIS
c/o Chris Regan, IBR Program Environmental Manager
500 Broadway Street, Suite 200
Vancouver, WA 98660

RE: Comments on the Interstate Bridge Replacement Supplemental EIS

Dear Mr. Regan:

Columbia Waterfront LLC (CWLLC) is the master developer of The Waterfront Vancouver, situated west of the I-5 along the northern banks of the Columbia River. This 32-acre, 21 city block project was undergoing the planning stages back in 2011 when the previous Final EIS and Record of Decision was issued.

As of 2018, the first buildings and the shoreline park opened with subsequent construction and occupancies occurring monthly. This area has fully blossomed into a new vibrant segment of downtown Vancouver that is located approximately 1,000 feet from the south eastern corner of the development to the existing bridge and 800 feet from the westernmost extent of the Locally Preferred Alternative (LPA).



Our comments focus on the potential impacts to The Waterfront Vancouver, realized by this ambitious bridge replacement project as disclosed in the Supplemental Draft EIS document. We have included a transportation memorandum written by transportation consultants Lancaster Mobley that expands upon the transportation issues along with park and ride lots and tolling.

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Changes Since Final Record of Decision in 2011 – The Waterfront Vancouver is Built and Occupied

The Waterfront Vancouver is now built and occupied with over 2,500 people, 1,900 dwelling units, 138 hotel rooms, 63,000 sf of office and 121,000 sf of retail. Added to this are the Port of Vancouver developments consisting of the AC Marriott Hotel and Zoom Info Blocks A and C for an additional 1,400 people, 360,000 sf of office, 15,000 sf of retail and 150 hotel rooms. This figure is further expanded by the Gateway Project next to City Hall, contributing 420 residential units, 46,000 sf of retail and 160,000 sf of office space. All of these projects will build out in the next 5 years resulting in a grand total of:

- 3,400 Residential Units
- 713,000 sf Office
- 290,000 sf Commercial
- 288 Hotel Units

This translates to a population of 10,500 people including employees present on the site. Added to this are 2,000 daily visitors and park users depending upon the weather. This is a significant population base abutting the proposed project which has become a regional destination for both Washington and Oregon.

This geographic area will be impacted during the entire construction time period of 9 – 15 years (Table 1 page S-11), by temporary construction staging, noise, vibrations, road and interchange detours, night lights on barges in the river, views, and increased travel times from Portland.

Section 3.4.1 acknowledges that there is development present at The Waterfront Vancouver. It further states in Table 3.4-1 *that the comparison of the impacts and benefits of the CRC LPA and those of the IBR modified LPA, that there are no impacts that would differ substantially from those of the CRC LPA.* The comparison to the previous 2011 Final EIS did not include a functioning inhabited part of the city, merely estimated planning numbers.

Figure 3.4-1 provides the location of Primary and Secondary Study areas subject to impacts that includes the entire Waterfront Vancouver area between both designations. Section 3.4 under the Washington Study Area (page 3-4.10) again acknowledges The Waterfront Vancouver as an existing facility and refers to more details about projects in the Primary Study area to be discussed in the Land Use Technical Report.

Section 3.3.3 Temporary Effects (page 3.4-36) cites that because construction activities are temporary, they are unlikely to have lasting impacts on land uses, land use patterns, or compliance with land use policies. It does acknowledge that construction related impacts from noise, dust, lighting and traffic delays may have secondary impacts on land uses. This is exactly the concern for the residents and employees all living and working at The Waterfront Vancouver. This section refers the reader to the Technical reports for more detailed information. The report goes on to state: *"Many land uses in downtown Vancouver, particularly business which rely heavily on pass by traffic, could be negatively impacted by construction activities due to detours, unclear access, noise, vibration, and dust."* These impacts need to be more fully discussed

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along with mitigation measures. The Waterfront Vancouver businesses includes two hotels, a senior living facility and 25 retailers and restaurants. These all rely on customers and deliveries arriving daily at this destination, not just from pass-by trips. The pass-by trips in the corridor according to the Transportation Technical Report Figure 3-10 are 23%, north bound in the PM peak hour and 14% in the southbound AM peak hour (Figure 3-9). The construction impacts will make it more difficult and time consuming to access The Waterfront Vancouver project from I-5. The longer the project goes on, the more it impacts on each and every business and residential quality of life. (SEIS in the Land Use Technical Report Table 1-4, identifies 9 – 15 years). This is a significant time period that should be discussed.

Local Temporary Effects (on page 43.4-38) talk about ramp closures to SR 14 interchange would primarily affect traffic from downtown Vancouver to points east and the connection between Portland and downtown Vancouver on I-5. We believe such detours from this intersection will shift users further north to Mill Plain and overburden the already congested intersection ramps. This aspect needs to be addressed in the FEIS.

Section 3.4.6 Potential Avoidance, Minimization, and Mitigation Measures (page 4.3-41) Identifies temporary effects under Program-Specific Mitigation, Land Use. It appears that the measures listed do not mitigate the problems and in this case each implementation measure should result in minimizing and reducing the impacts. Monitoring noise, managing construction activities, carefully planning phased work are all concepts of mitigation that do not result in a physical change to the proposed actions. We fully endorse the mitigation measure that reduces or avoids road closures of affected roadways and access points to nearby businesses. We recommend you revisit the other mitigation measures to be more specific in minimizing and reducing impacts. We note that Noise and Vibrations section does include a relevant mitigation for construction noise (page S-41) that discusses various options for driving piles by the use of drilled shafts or auguring if possible. This should be elaborated upon as it relates to businesses and uses within The Waterfront Vancouver that are 1,000 to 1,500 feet away.

Transportation

The Waterfront Vancouver is directly served by the I-5 Corridor from the north and south directions. Impacts to this facility have a direct bearing to those working and living at The Waterfront Vancouver. We are attaching a transportation memorandum from Lancaster Mobley dated November 18, 2024 for more details about our concerns. One of our main concerns is Alternative 8 without the "C Street Ramps". We understand from the Transportation Technical Report (Page1-40) that the only reason this alternative is considered is because of "*changes in local planning that necessitate consideration to reduce the footprint and associated direct and temporary environmental impacts in Vancouver*". Removing this ramp will cause a number of impacts on the interchanges further north, in particular the Mill Plain interchange, where all motorists trying to gain access into downtown Vancouver and The Waterfront Vancouver will be diverted to this interchange. The northbound I-5 users will have to drive further north and then have to double back southward to gain access to The Waterfront Vancouver. Table 3 in the Summary, under Land Use and Economics states: *" removal of the C Street ramps would result*

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in traffic delay and increase travel times near the Mill Plain Boulevard interchange and downtown Vancouver, which would have an economic impact on local businesses". In addition, under Total Regional Energy Consumption it is stated *" but would create additional congestion on local streets which would decrease vehicle efficiency, resulting in increased energy consumption".* Finally, under Climate Change, it is noted that removing C ramps would result in *"...additional congestion and idling would decrease vehicle efficiency, resulting in increased GHG emissions."* We see no valid reasons for retaining this alternative, and we understand from our correspondence with the City of Vancouver this alternative is not favored.

Traffic accessing The Waterfront Vancouver uses not only the C Street ramps but the other intersections further north that channel people through the street network to and from The Waterfront Vancouver. It is imperative to maintain this C ramp connection.

Utilities

The Land Use Technical Report Figure 4-4, Property Impacts to Downtown Vancouver, reveals an impacted public facility to the Waterfront Sanitary Sewer Pump Station, shown with a blue hatched square just south of the BNSF rail tracks and to the west of I-5.



Additionally, Appendix A of the Acquisitions Technical Report lists the corresponding address as 201 Columbia Street, Vancouver, WA 98661 for full acquisition under all the alternatives. Going a step further, the Utilities Technical Report shows the Sewer Pump Station and mentions in Section 3.3 of the technical report that this facility could be affected by the new bridge foundations. The Transportation Technical Report Figure 4-6 shows that a potential Waterfront Park and Ride Location #2 consuming the pump station. This needs to be discussed in the report.

This pump station services the entire 32-acre waterfront properties including those of the Port of Vancouver. The planned purchase of the facility and land as mitigation does not account for the relocation to suitable property, design, permitting, bidding and construction of the specialized pumps and line connections that need to take place ahead of the bridge construction. This project originally cost $1.6 million in 2017 (roughly $2.4 million in today's value) not including the value of the land that was contributed by the City. The mitigation measures only account for compensation. We need to ensure mitigation measures account for no disruption of this vital service to The Waterfront Vancouver. We have communicated this concern to the City of Vancouver staff Cheryl Hill in Public Works as well as Kathrine Kelly of the Community Development Department. They have confirmed that they have been in communications with the IBR staff on this issue, however, there is no resolution to the outcome at this time. We recommend the design team focus on preserving this facility and designing footings and foundations to avoid this facility.

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Tolling

The Transportation Technical Report, Section 1.1.8 Tolling, explains that both Washington and Oregon are authorized under the federal tolling program codified in 23 U.S. Code Section 129. Pre-tolling would commence when the project gets underway, in 2026. We learned from an IBR presentation that the Federal authorization for tolling was not granted for the Glenn Jackson Bridge on I-205. We know from previous economic studies conducted for Clark County that there were an estimated 65,000 daily trips from those commuting to Portland. These user groups will be impacted the most due to their daily commutes. The Transportation Technical Report (on page 3-19) does reveal the split in daily vehicle trips as 1-205 receives 55% of daily trips versus I-5 at 45%. There is limited discussion about the actual mechanics of the toll devices and whether they are just cameras or there are actual physical structures that need to be erected and maintained. There seems to be no discussion about the potential traffic pattern diversions of trips for those that are price sensitive to tolling that would shift over to I-205. We firmly believe that the tolling will unduly hurt Vancouver before any benefits can be realized. We recommend that the report evaluate the shift in vehicle patterns as a result of tolling.

Park and Ride Facilities

Chapter 2, Figures 2-11 and 2-23 depict three (3) park and ride facilities adjacent to The Waterfront Vancouver area. The Land Use Technical Report in Section 4.2.2.1 describes the potential facilities as providing 570 parking spaces. Figures 4-6 and 4-7 provide the most detailed outlines of the proposed locations. Table 3.3-4 provides the most complete list of land characteristics for each option. Site #1 is between Washington Street and Columbia Street appears to contain two property owners and two existing buildings, yet Figure 4-6 states "*no additional property impacts beyond local road improvement impacts*". This contradicts the information in Appendix Table A5 that lists the properties for acquisition.

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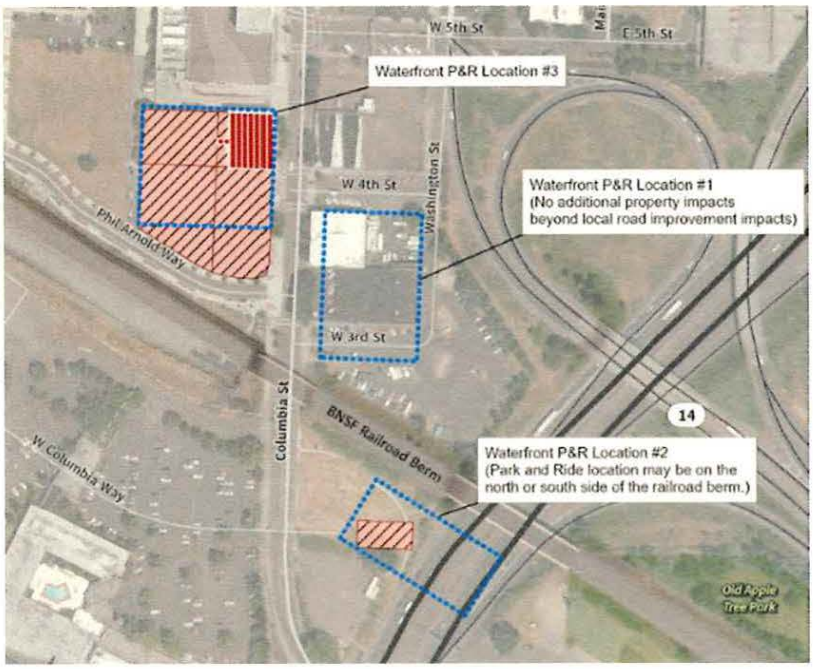
CCB#159250

Site #2 is located either on the north or south side of the BNSF railroad berm, with the structure largely under the new I-5 bridge. Site #3 contains land and a building owned by the City of Vancouver and such parking to be incorporated within the "Gateway" project.



The impacts and any mitigation measures for these facilities are not disclosed in Section 3 of the document. The potential impacts beyond the construction phase would be realized by channeling traffic patterns with a concentration of vehicles entering and exiting the streets servicing them. What are the typical vehicle trips for a facility like this? Related to this is the visual appearance of such facilities and how they would meet City of Vancouver regulations for aesthetic design. The most important question not answered is why is a park and ride facility needed at this location instead of at the Evergreen terminus.

Temporary Staging

Section 3.3.4 identifies temporary construction easements in both Oregon and Washington. We are most concerned as to the activities that could or will take place on the easements abutting the south side of Block 2 at The Waterfront Vancouver and along Terminal 1 of the Port of Vancouver. The extent of easements are shown in the Land Use Technical Report in Figure 4-4 below with the red arrow showing the area of concern.



These easements abut The Waterfront Vancouver development and the intensity and durations of the uses on them will have a direct temporary impact on the ongoing functions of the project. This aspect of construction staging at this close location detracts users of The Waterfront Vancouver and will lead to unsightly views from the blocks acting as a deterrent to the user experience. We question if large vehicles will be delivering construction

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materials to these locations and if materials will be stored, stacked, piled or job trailers will erected. What might the impacts be to existing traffic patterns. Is there any construction fencing around the sites? Will they be illuminated and secured? What impacts will be anticipated from noise and vibrations? We also question if barges will be tied up at these locations and if so, for what time duration.

Visual Quality

The DSEIS in Section 3.9 discloses visual impacts from a variety of locations as shown on Figure 3.9-2. Two of the key viewpoints from our perspective are numbers 20 and 26, both looking from the waterfront project looking east and south towards the I-5 corridor.

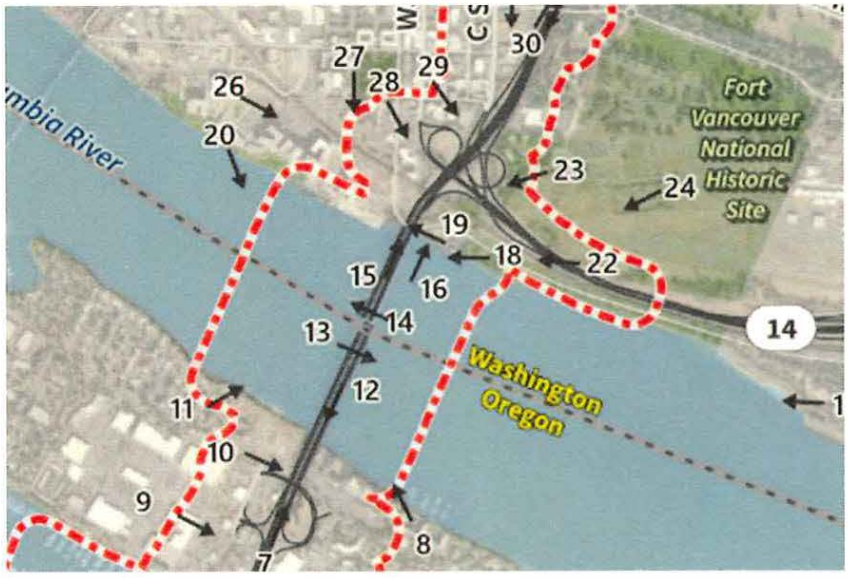

Table 3.9-6 identifies Key Vision Point (KVP) #20 as an "Adverse" degree of impact on Visual Quality. Key vision point #26 is identified on Table 3.9-7 as an "Adverse" degree of impact on Visual Quality as well. The report within Chapter 3, under the Vancouver Downtown Landscape Unit does not provide a photo simulation for either of these prominent locations. Instead, the photo simulations are from KVP #8 on the south shore of the Columbia, east side of I-5, looking north west. We believe the report should include similar photo simulations for KVP #20 and #26. We find that the Visual Quality Technical Reference Report does include existing KVP 20 in Figures 3-18 and 3-19 and KVP 26 within Figure 3-25. What is missing are the photo simulations of the three main bridge options from these key visual points. We strongly recommend that this be added to the report due to the significance of the population base and visitor activity at The Waterfront Vancouver. From a pure visual impact standpoint, the CWLLC prefers the Alternative Options 6 and 7 that are single level.

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We thank you for the opportunity to provide comments on the immense public works project that plays a vital role in both Oregon and Washington.

Regards,



Barry A. Cain
Manager of Columbia Waterfront LLC

Attachment: Lancaster Mobley Memo dated November 18, 2024

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1130 SW Morrison St., Suite 318
Portland, OR 97205
503.248.0313
lancastermobley.com

Memorandum

11/18/2024



To: **Columbia Waterfront, LLC**

From: **Daniel Stumpf, PE**
Todd E. Mobley, PE

Date: **November 18, 2024**

Subject: **Interstate Bridge Replacement Program: Draft SEIS Comments**

Introduction

This memorandum is written to provide comments on the Interstate Bridge Replacement (IBR) Program Draft Supplemental Environmental Impact Statement (SEIS). Our review and comments focus on the transportation related portions of the SEIS, particularly as it relates to access and connectivity to the Vancouver Waterfront and surrounding neighborhoods.

Vancouver Waterfront & SEIS Timeline

Accurately quantifying and capturing the trips to and from the Vancouver Waterfront is a critically important element of the traffic analysis in the SEIS. This popular, high-density neighborhood is new, having started construction only shortly before the analysis for the SEIS began.

Construction started on the waterfront in 2016, with a grand opening in 2018. At that time, two restaurants were open for business. Now, only six years later, the waterfront is built, with 1,900 residential dwelling units, 138 hotel rooms, 63,000 square feet of office, and 121,000 square feet of retail. The adjacent Port of Vancouver development area includes the AC Marriot Hotel and ZoomInfo Blocks A and C, which adds 360,000 square feet of office, 15,000 square feet of retail, and another 150 hotel rooms.

According to the SEIS[1], Interstate 5 (I-5) mainline traffic counts were collected between 2018-2019, well before most of this development occurred. Additional counts were collected between 2021 and 2023 for both the I-5 mainline and locally impacted intersections, but it is not clear how volume adjustments were made to account for impacts associated with the COVID-19 pandemic while considering most area development had occurred post-2019. Section 1.3 of the SEIS *Transportation Technical Report* does suggest the analysis had considered impacts associated the Vancouver Waterfront project, Terminal 1 development, the Renaissance Boardwalk, and the Waterfront Gateway project, among other projects, but limited information pertaining to how they were included in volume projections was provided (e.g., were these projects incorporated in the 2018-2040/2045 Regional Transportation Plan modeling data or added to the collected counts by some other method).

[1] Interstate Bridge Replacement Program *Transportation Technical Report*, Table A-1 Data Collection Plan Summary

It is also unclear whether the study had taken into consideration future impacts associated with the entirety of the City of Vancouver's City Center Vision subarea plan, where approximately 2,000 additional PM peak hour trips still remain as vested for use by future development.

With traffic counts that occurred over as many as five years, spanning both the COVID pandemic and the vast majority of the Vancouver Waterfront and surrounding development, we are not able to confirm that the traffic data used in the analysis is accurate or representative of baseline or a reasonable estimation of future conditions.

Inclusion of C Street Ramps

The Vancouver Waterfront and downtown Vancouver currently enjoys convenient access to I-5 via the SR 14 interchange, where there are on ramps at the intersection of W 5th Street and Washington Street, and off ramps at E 6th Street and C Street. Collectively, these are referred to as the "C Street ramps". The modified LPA includes scenarios both with and without these ramps. We conducted a thorough review of how removal of these ramps would impact access to the Vancouver Waterfront.

The SEIS *Transportation Technical Report* included a review of traffic conditions and impacts to locally significant intersections within four separate subareas along/near the affected Interstate 5 corridor: Portland Mainland and Hayden Island (Subarea A), Columbia River Bridges (Subarea B), Downtown Vancouver (Subarea C), and Upper Vancouver (Subarea D). A total of 80 locally affected intersections were evaluated within the four subareas, noting revisions to existing intersections and the construction of new intersections may occur depending on the design that is implemented as part of the IBR project.

The SEIS *Transportation Technical Report* evaluated four scenarios for these intersections:

- Existing Conditions (i.e., 2019 No-build Conditions)
- Future 2045 No-Build Conditions
- Future 2045 Conditions with the modified Locally Preferred Alternative (LPA) bridge design without restrictions to the C Street I-5 ramps.
- Future 2045 Conditions with the modified LPA bridge design with restrictions to the C Street I-5 ramps.

Reporting specifically on the Vancouver/WSDOT intersections within Subareas B and C that would be impacted by the closure of the C Street ramps, Table 1 below summarizes the AM and PM peak hour operation of the intersections that were found to exceed adopted agency standards.

Table 1: Intersection Capacity Analysis Summary

Intersection		2019 Existing			2045 No-Build			2045 LPA			2045 LPA w/o C Street Ramps		
		LOS	Delay (s)	v/c	LOS	Delay (s)	v/c	LOS	Delay (s)	v/c	LOS	Delay (s)	v/c
AM Peak Hour													
22	Franklin Street at Mill Plain Boulevard	B	15	0.44	D	36	0.53	C	18	0.56	B	18	0.49
24	Washington Street at 15th Street	A	8	0.43	A	8	0.59	B	16	0.65	**F**	95	0.37
25	Main Street at 15th Street	A	6	0.43	B	14	0.56	C	35	0.63	**F**	100	0.49
28	Columbia Street at Mill Plain Boulevard	B	11	0.41	B	11	0.40	A	9	0.41	B	16	0.74
31	Broadway Street at Mill Plain Boulevard	A	6	0.31	A	7	0.33	A	7	0.33	B	13	0.72
34	I-5 NB Ramps at Mill Plain Boulevard	C	24	0.71	D	35	0.68	B	19	0.57	D	39	1.13
57	Columbia Shores Boulevard at SR 14 EB Off-Ramp	C	20	0.59	D	47	0.59	C	33	0.57	C	33	0.57
58	Columbia Shores Boulevard at Columbia Way	B	18	0.85	C	27	0.84	C	25	0.82	C	26	1.11
PM Peak Hour													
22	Franklin Street at Mill Plain Boulevard	C	26	0.37	B	16	0.39	B	19	0.44	**F**	>300	0.53
24	Washington Street at 15th Street	A	6	0.26	A	7	0.31	A	9	0.33	B	10	0.39
25	Main Street at 15th Street	A	10	0.37	B	11	0.45	B	10	0.46	B	14	0.53
28	Columbia Street at Mill Plain Boulevard	D	44	0.60	B	13	0.57	C	38	0.63	**F**	>300	0.78
31	Broadway Street at Mill Plain Boulevard	C	35	0.58	A	10	0.52	C	25	0.57	**F**	93	0.70
34	I-5 NB Ramps at Mill Plain Boulevard	C	27	0.84	C	29	0.75	C	29	1.01	**F**	183	1.07
57	Columbia Shores Boulevard at SR 14 EB Off-Ramp	D	40	0.68	**F**	127	0.78	**E**	63	0.69	**E**	58	0.73
58	Columbia Shores Boulevard at Columbia Way	**F**	>300	0.51	**F**	290	0.52	**F**	>300	0.48	**F**	>300	0.51

Table Notes: ***BOLDED/RED*** *text indicates intersection operation above adopted mobility standards.*

As shown above, the closure of the C Street ramps is projected to cause six intersections to exceed agency standards relative to all other analysis scenarios. Two other intersections are projected to exceed agency standards by 2045; however, the closure of the C Street ramps is not expected to improve operation to acceptable levels.

It is noted that the SEIS *Transportation Technical Report* mentions the above operation results are generally expected to under report actual operation at the study intersections since the analysis does not take into consideration potential queue spillback from the I-5 mainline. Quoting from sections 3.6.4 and 4.6.4.2 of the Transportation Technical Report:

> *3.6.4*
>
> *The study intersections in this section were analyzed without considering the impacts of freeway congestion spilling back onto local roadways. Section 3.3.4.5, Impacts to Local Roads, documents the locations and extents of freeway congestion spilling back onto the local roadways. Intersections that would be impacted by freeway congestion may operate worse than shown in the following section.*
>
> *4.6.4.2*
>
> *Removal of the C Street ramps would result in substantial impacts to the Mill Plain Boulevard and I-5 interchange and to the Mill Plain Boulevard (eastbound) and 15th Street (westbound) couplet west of I-5. The number of redirected trips from downtown Vancouver that would otherwise have accessed I-5 through C Street 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.*

Figure 4-18 of the SEIS Transportation Technical Report, shown below, visually depicts projected queues along Mill Plain Boulevard during the AM peak hour for the 2045 future year analysis scenarios. Note the scenario without the C Street ramps is expected to create the longest queues in the eastbound direction along Mill Plain Boulevard and in the southbound direction of intersecting cross-streets relative to all other analysis scenarios.

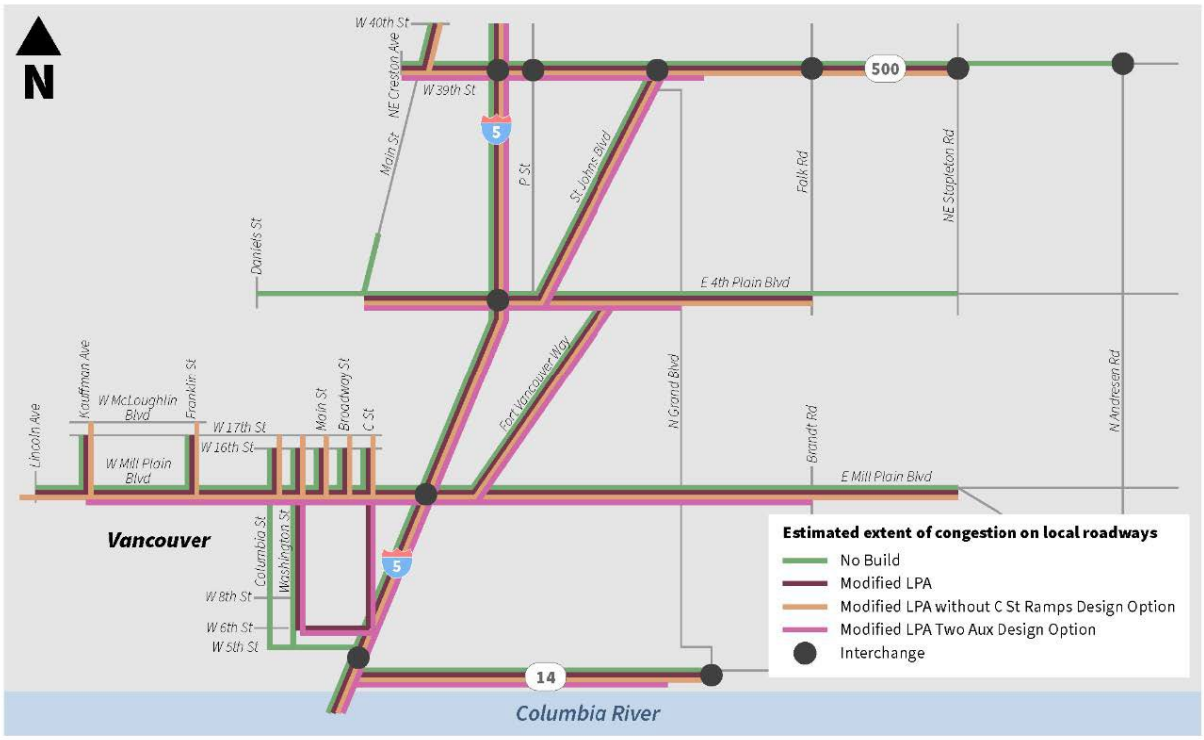

Figure 1: Figure 4-18, Transportation Technical Report

Per the above analysis findings, retaining the C Street ramps as an access point to/from I-5 is essential to maintain adequate operation of impacted intersections and reduce I-5 queue spillover impacts to local streets, particularly along Mill Plain Boulevard. The Vancouver Waterfront is a recently developed destination of travel, and closing the C Street ramps will unnecessarily burden Mill Plain Boulevard and intermittent streets/intersections between the I-5/Mill Plain Boulevard interchange and the Waterfront.

City of Vancouver Support for C Street Ramps

The City of Vancouver also has significant interest in ensuring safe and efficient access to the Vancouver Waterfront, Downtown Vancouver, Port of Vancouver properties and all of SW Vancouver. In materials and presentations made to various commissions within the City, staff has highlighted the poor operation that results from not including the C Street ramps in the Modified LPA. They have also comments and recommendations as follows[2]:

> *With respect to the C-Street Ramps design option, the City supports the Modified LPA, which includes these downtown ramp connections to I-5. The findings of the Transportation technical report in the SEIS clearly show multiple adverse impacts to the local street system without these connections. This impacts a primary freight corridor as well as transit service that operates in the downtown area. The placement of these ramp connections is not anticipated to result in a significant visual barrier as there will already be major structural elements associated with the westbound SR-14 to southbound I-5 ramp as well as the structure that will carry the light transit rail lines through interchange areas.*

[2] City of Vancouver Memorandum to Transportation and Mobility Commission, dated October 24, 2024

Park and Ride Lots

Three potential park and ride lots are identified near the future Waterfront Station, although the SEIS does state "up to one" park and ride could be built to serve the Waterfront Station[3]. The three locations under consideration are shown in Figure 1 below, labeled P&R 1a-c.



Figure 2: Excerpt from Figure 1-23, Transportation Technical Report

Park and ride locations are also planned at the Evergreen Station, which will be the northern terminus of the light rail line, at least as considered as a part of this project. Park and ride lots are most effective when they are located outside of the "ring of congestion" in cities and urbanized areas[4]. In this case, it does make sense to consider a park and ride facility to serve the terminus of the light rail line, but this would be more appropriately sited near the Evergreen Station only. One of the sites under consideration is adjacent to the Vancouver Community Library, which would make an excellent site for a co-located park and ride facility.

We would recommend strongly against locating a land-intensive, lower density, suburban treatment such as a park and ride lot in the Waterfront area. Land surrounding the Waterfront Station should be reserved for higher density urban development to complement the current development patterns that currently exist and are planned for this district. A park and ride lot would focus passenger vehicle trips in an area that should be emphasizing pedestrian, bicycle, micromobility, and transit usage.

Safety is a key component to the successful operation of park and ride facilities. Direction from the Washington Department of Transportation (WSDOT) for planning park and ride lots states that safety and security for people and personal vehicles is a *requirement* for park and ride facilities to be effective[5]. Maintaining a safe and comfortable environment for all people at passenger vehicle parking areas in dense urban areas is challenging at best.

Lastly, COVID-era changes in commuting and transit use should carefully be considered before committing valuable real estate to park and ride lots. Usage at other park and rides across the Portland and Vancouver areas is greatly reduced compared to pre-pandemic levels. For example, TriMet is actively planning for the redevelopment of multiple park and ride lots that are no longer viable for that use, due primarily to changes to commuting behavior and safety. Additionally, C-Tran has effectively removed all transit service to/from the

[3] Interstate Bridge Replacement Program *Transportation Technical Report*, Page 1-3

[4] Texas A&M Transportation *Institute Mobility Investment Priorities, System Modification Strategies*

[5] WSDOT Transportation Systems Management & Operations, *Park and Ride*, tsmowa.org

Salmon Creek Park & Ride, which previously offered two express bus service lines between Salmon Creek, downtown Vancouver, and downtown Portland.

Tolling

The SEIS and the *Transportation Technical Report* indicated that tolling would begin on the existing Interstate Bridge during construction of the Modified LPA[6]. The document speculates on the potential impacts of both tolling and construction, including how trips could divert, be made at different times of the day, be made via transit, or not occur at all. With a construction schedule that is estimated to last between 9 and 15 years, the disruptive combination of both tolling and construction is not a short term or insignificant consideration.

The real impacts to the Vancouver Waterfront and the downtown area specifically should be addressed and quantified in more detail, including the economic impacts to the area. For context, the Vancouver Waterfront has developed and become a regional draw and economic center for the City of Vancouver and Clark County over the course of approximately eight years. The combined impacts of tolling and construction could be twice as long.

Other Review Considerations

Several other items of consideration were noted when reviewing the SEIS *Transportation Technical Report*, more so related to transparency when conducting review and reconstructing methodologies used in preparation of the study. These items include the following.

Traffic Growth Assumptions

According to Section 4.6.3: Peak-Hour Traffic Forecasts, Table 4-24 provides a listing of AM and PM peak hour annual growth rates that were applied to the locally reviewed intersections. When comparing the total entering intersection volumes between the 2019 adjusted baseline volumes and the 2045 no-build volumes in Appendix D, significant variation between the back calculated growth rates and those listed in Table 4-24 were found. In some cases these variations were found to either be greater than or less than those listed in Table 4-24, regardless of whether or not the annual growth rates were applied to the 2019 baseline volumes in a linear or compounding manner.

Lancaster Mobley does not believe these growth rates were applied incorrectly to the intersections, rather it is unclear whether or not the growth rates reported in Table 4-24 are "rough" averages of growth that were applied to these intersection, if the methodology for applying growth rates was not applied to the total entering intersection volumes as a whole, or if some other methodology was used. Clarification for these discrepancies is recommended.

The growth calculations conducted to determine these discrepancies at several intersections in Vancouver are included as an attachment to this memorandum.

Volumes and Capacity Analysis

Several capacity analysis related items of interest were found when reviewing the report narrative and accompanying appendices:

[6] Interstate Bridge Replacement Program *Transportation Technical Report*, Section 5.11, Tolling and Diversion

- The traffic counts in Appendix D do not include counts details related to peak hour factors, heavy vehicle percentages, the day/month/year counts were collected, etc. For review and transparency purposes, access to these count details could be made available.
- The traffic counts in Appendix D are labeled as Existing, No-Build, MLPA, LPA 1, LPA 2, LPA 3. It's not clear for the MLPA and the LPA numbers which set of counts applies to which analysis scenario.
- When evaluating local intersection operation, the study relied on using SimTraffic methodologies to evaluate intersection delay and LOS, while using HCM 6th Edition and HCM 2000 methodologies were used to evaluate v/c ratios for unsignalized and signalized intersections, respectively.
    - According to section 7.6.1.1, justification for using SimTraffic in lieu of Synchro to evaluate intersection delay/LOS was due to Synchro's static input and output metrics which do not account for congestion and queue spillback between intersections. While this is a reasonable argument for using SimTraffic, it does raise the question of why queue spillback from I-5 was not considered in the SimTraffic analysis. Section 3.6.4 indicates that evaluating local congestion in a manner independent of I-5 congestion was intentional, but no specific reasoning for why was provided.
    - The HCM 6th Edition was used to evaluate unsignalized intersection v/c ratios. The current edition of the HCM is the 7th Edition, published in 2022, which should have been used to evaluate v/c ratios.
    - The HCM 2000 was used to evaluate v/c ratios for signalized intersections. Specific to the intersections under the jurisdiction of ODOT, the v/c ratios for signalized intersections could have been evaluated utilizing methodologies presented in ODOT *Analysis Procedures Manual* Version 2, section 13.4.4: Critical Intersection v/c Ratio.
- For review and transparency purposes, access to the 2021 signal timing plans used in the analysis should be made available.
- The local intersection performance results in Appendix E do not indicate what input parameters were incorporated to determine these results (e.g., turning movement volumes, peak hour factors, heavy vehicle percentages, signal timing, lane/traffic control configurations, etc.). For review and transparency purposes, access to these input parameters could be made available.

Summary & Conclusion

A summary of our review and resulting comments and recommendations are below.

1. Traffic volumes and forecast operations on the local transportation system in the vicinity of the Waterfront are uncertain, given data was collected over a five-year period that spans both the COVID pandemic and the majority of development in the area. To avoid the excessive adjustments to data in the current draft SEIS, it is recommended that new intersection turning movement counts in the vicinity of the Vancouver Waterfront and Downtown Vancouver be conducted and incorporated in the final SEIS.
2. The current draft SEIS shows that the impacts of removing the C Street ramps from the Modified LPA are significant and unacceptable. The City of Vancouver's review comments align with our concerns

about the poor access and failing facilities that would result. The analysis conducted to date is sufficient to show that removal of the C Street ramps is not realistic. It is recommended that the scenario without the C Street ramps is struck from the Modified LPA and is not considered in the final SEIS.

3. Locating park and ride facilities near the planned Waterfront Station is counter to the City of Vancouver's planning efforts that show no additional public parking structures are needed to meet current or projected demand. Further, these facilities detract from the City's vision of a pedestrian-oriented Waterfront and downtown. It is recommended that further analysis regarding park and ride locations in the final SEIS focus only on the proximity to the Evergreen Station.

4. The current SEIS intends to begin tolling during construction and prior to completion of the Modified LPA. The combined impacts of tolling *and* construction impacts are not analyzed in detail within the SEIS, but they would have a very significant impact on the Vancouver Waterfront and the downtown area. It is recommended that the timing of the start of tolling be reconsidered and that additional analysis, including an economic impact analysis of the combined effects, be included in the final SEIS.

5. The technical traffic analysis in the SEIS is large and detailed. There is no access to important data and technical analysis output to thoroughly review and understand how the analysis was conducted. It is recognized that including all of this information in the *Transportation Technical Report* may not be practical given the large amount of information and resulting pages, but providing separate technical appendices available for public download would provide the necessary level of transparency to better understand the analysis and rely upon the results and recommendations.

		AM Peak Hour						
		2021-2023 (2019 Baseline)	2045 No Build					2021-2023 (2019 Baseline)
ID	Intersection	Total Volumes	Total Volumes	Total Growth	Calculated Growth Per Year (Linear)	Calculated Growth Per Year (Compounded)	AM Peak-Period Annual Growth Rate per Table 4-24	Total Volumes
27	Mill Plain Blvd WB & C Street	1185	1820	53.59%	2.1%	1.7%	1.3%	1480
32	Mill Plain Blvd EB & C Street	1285	1430	11.28%	0.4%	0.4%	1.3%	2220
44	7th Street & C Street	290	455	56.90%	2.2%	1.7%	2.1%	240
50	6th Street & Broadway Street	505	810	60.40%	2.3%	1.8%	2.1%	360
51	6th Street & C Street	750	1150	53.33%	2.1%	1.7%	2.1%	525
53	Phil Arnold Way & Esther Street	85	165	94.12%	3.6%	2.6%	3.6%	175
54	Phil Arnold Way & Columbia Street	150	350	133.33%	5.1%	3.3%	3.6%	255
55	Columbia Way & Esther Street	95	210	121.05%	4.7%	3.1%	3.6%	310
56	Columbia Way & Columbia Street	150	360	140.00%	5.4%	3.4%	3.6%	265

Table 4-24 Traffic Volume Annual Growth Rates for the No-Build Alternative
Table 4-25 Traffic Volume Annual Growth Rates for the Modified LPA and Options

Linear Growth Rate Equation: "Annual Rate" = "Total Growth" / (2045 - 2019)
Compounding Growth Rate Equation: "Annual Rate" = ("Total Growth" + 1) ^ (1 / (2045 - 2019)) - 1

GRAMOR
DEVELOPMENT

Via US mail and e-mail: DraftSEIS@interstatebridge.org

November 18, 2024

IBR Program Draft SEIS
c/o Chris Regan, IBR Program Environmental Manager
500 Broadway Street, Suite 200
Vancouver, WA 98660

RE: Comments on the Interstate Bridge Replacement Supplemental EIS

Dear Mr. Regan:

Columbia Waterfront LLC (CWLLC) is the master developer of The Waterfront Vancouver, situated west of the I-5 along the northern banks of the Columbia River. This 32-acre, 21 city block project was undergoing the planning stages back in 2011 when the previous Final EIS and Record of Decision was issued.

As of 2018, the first buildings and the shoreline park opened with subsequent construction and occupancies occurring monthly. This area has fully blossomed into a new vibrant segment of downtown Vancouver that is located approximately 1,000 feet from the south eastern corner of the development to the existing bridge and 800 feet from the westernmost extent of the Locally Preferred Alternative (LPA).



Our comments focus on the potential impacts to The Waterfront Vancouver, realized by this ambitious bridge replacement project as disclosed in the Supplemental Draft EIS document. We have included a transportation memorandum written by transportation consultants Lancaster Mobley that expands upon the transportation issues along with park and ride lots and tolling.

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Changes Since Final Record of Decision in 2011 – The Waterfront Vancouver is Built and Occupied

The Waterfront Vancouver is now built and occupied with over 2,500 people, 1,900 dwelling units, 138 hotel rooms, 63,000 sf of office and 121,000 sf of retail. Added to this are the Port of Vancouver developments consisting of the AC Marriott Hotel and Zoom Info Blocks A and C for an additional 1,400 people, 360,000 sf of office, 15,000 sf of retail and 150 hotel rooms. This figure is further expanded by the Gateway Project next to City Hall, contributing 420 residential units, 46,000 sf of retail and 160,000 sf of office space. All of these projects will build out in the next 5 years resulting in a grand total of:

- 3,400 Residential Units
- 713,000 sf Office
- 290,000 sf Commercial
- 288 Hotel Units

This translates to a population of 10,500 people including employees present on the site. Added to this are 2,000 daily visitors and park users depending upon the weather. This is a significant population base abutting the proposed project which has become a regional destination for both Washington and Oregon.

This geographic area will be impacted during the entire construction time period of 9 – 15 years (Table 1 page S-11), by temporary construction staging, noise, vibrations, road and interchange detours, night lights on barges in the river, views, and increased travel times from Portland.

Section 3.4.1 acknowledges that there is development present at The Waterfront Vancouver. It further states in Table 3.4-1 *that the comparison of the impacts and benefits of the CRC LPA and those of the IBR modified LPA, that there are no impacts that would differ substantially from those of the CRC LPA.* The comparison to the previous 2011 Final EIS did not include a functioning inhabited part of the city, merely estimated planning numbers.

Figure 3.4-1 provides the location of Primary and Secondary Study areas subject to impacts that includes the entire Waterfront Vancouver area between both designations. Section 3.4 under the Washington Study Area (page 3-4.10) again acknowledges The Waterfront Vancouver as an existing facility and refers to more details about projects in the Primary Study area to be discussed in the Land Use Technical Report.

Section 3.3.3 Temporary Effects (page 3.4-36) cites that because construction activities are temporary, they are unlikely to have lasting impacts on land uses, land use patterns, or compliance with land use policies. It does acknowledge that construction related impacts from noise, dust, lighting and traffic delays may have secondary impacts on land uses. This is exactly the concern for the residents and employees all living and working at The Waterfront Vancouver. This section refers the reader to the Technical reports for more detailed information. The report goes on to state: *"Many land uses in downtown Vancouver, particularly business which rely heavily on pass by traffic, could be negatively impacted by construction activities due to detours, unclear access, noise, vibration, and dust."* These impacts need to be more fully discussed

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along with mitigation measures. The Waterfront Vancouver businesses includes two hotels, a senior living facility and 25 retailers and restaurants. These all rely on customers and deliveries arriving daily at this destination, not just from pass-by trips. The pass-by trips in the corridor according to the Transportation Technical Report Figure 3-10 are 23%, north bound in the PM peak hour and 14% in the southbound AM peak hour (Figure 3-9). The construction impacts will make it more difficult and time consuming to access The Waterfront Vancouver project from I-5. The longer the project goes on, the more it impacts on each and every business and residential quality of life. (SEIS in the Land Use Technical Report Table 1-4, identifies 9 – 15 years). This is a significant time period that should be discussed.

Local Temporary Effects (on page 43.4-38) talk about ramp closures to SR 14 interchange would primarily affect traffic from downtown Vancouver to points east and the connection between Portland and downtown Vancouver on I-5. We believe such detours from this intersection will shift users further north to Mill Plain and overburden the already congested intersection ramps. This aspect needs to be addressed in the FEIS.

Section 3.4.6 Potential Avoidance, Minimization, and Mitigation Measures (page 4.3-41) Identifies temporary effects under Program-Specific Mitigation, Land Use. It appears that the measures listed do not mitigate the problems and in this case each implementation measure should result in minimizing and reducing the impacts. Monitoring noise, managing construction activities, carefully planning phased work are all concepts of mitigation that do not result in a physical change to the proposed actions. We fully endorse the mitigation measure that reduces or avoids road closures of affected roadways and access points to nearby businesses. We recommend you revisit the other mitigation measures to be more specific in minimizing and reducing impacts. We note that Noise and Vibrations section does include a relevant mitigation for construction noise (page S-41) that discusses various options for driving piles by the use of drilled shafts or auguring if possible. This should be elaborated upon as it relates to businesses and uses within The Waterfront Vancouver that are 1,000 to 1,500 feet away.

Transportation

The Waterfront Vancouver is directly served by the I-5 Corridor from the north and south directions. Impacts to this facility have a direct bearing to those working and living at The Waterfront Vancouver. We are attaching a transportation memorandum from Lancaster Mobley dated November 18, 2024 for more details about our concerns. One of our main concerns is Alternative 8 without the "C Street Ramps". We understand from the Transportation Technical Report (Page1-40) that the only reason this alternative is considered is because of "*changes in local planning that necessitate consideration to reduce the footprint and associated direct and temporary environmental impacts in Vancouver*". Removing this ramp will cause a number of impacts on the interchanges further north, in particular the Mill Plain interchange, where all motorists trying to gain access into downtown Vancouver and The Waterfront Vancouver will be diverted to this interchange. The northbound I-5 users will have to drive further north and then have to double back southward to gain access to The Waterfront Vancouver. Table 3 in the Summary, under Land Use and Economics states: *" removal of the C Street ramps would result*

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in traffic delay and increase travel times near the Mill Plain Boulevard interchange and downtown Vancouver, which would have an economic impact on local businesses". In addition, under Total Regional Energy Consumption it is stated *" but would create additional congestion on local streets which would decrease vehicle efficiency, resulting in increased energy consumption".* Finally, under Climate Change, it is noted that removing C ramps would result in *"...additional congestion and idling would decrease vehicle efficiency, resulting in increased GHG emissions."* We see no valid reasons for retaining this alternative, and we understand from our correspondence with the City of Vancouver this alternative is not favored.

Traffic accessing The Waterfront Vancouver uses not only the C Street ramps but the other intersections further north that channel people through the street network to and from The Waterfront Vancouver. It is imperative to maintain this C ramp connection.

Utilities

The Land Use Technical Report Figure 4-4, Property Impacts to Downtown Vancouver, reveals an impacted public facility to the Waterfront Sanitary Sewer Pump Station, shown with a blue hatched square just south of the BNSF rail tracks and to the west of I-5.

Additionally, Appendix A of the Acquisitions Technical Report lists the corresponding address as 201 Columbia Street, Vancouver, WA 98661 for full acquisition under all the alternatives. Going a step further, the Utilities Technical Report shows the Sewer Pump Station and mentions in Section 3.3 of the technical report that this facility could be affected by the new bridge foundations. The Transportation Technical Report Figure 4-6 shows that a potential Waterfront Park and Ride Location #2 consuming the pump station. This needs to be discussed in the report.



This pump station services the entire 32-acre waterfront properties including those of the Port of Vancouver. The planned purchase of the facility and land as mitigation does not account for the relocation to suitable property, design, permitting, bidding and construction of the specialized pumps and line connections that need to take place ahead of the bridge construction. This project originally cost $1.6 million in 2017 (roughly $2.4 million in today's value) not including the value of the land that was contributed by the City. The mitigation measures only account for compensation. We need to ensure mitigation measures account for no disruption of this vital service to The Waterfront Vancouver. We have communicated this concern to the City of Vancouver staff Cheryl Hill in Public Works as well as Kathrine Kelly of the Community Development Department. They have confirmed that they have been in communications with the IBR staff on this issue, however, there is no resolution to the outcome at this time. We recommend the design team focus on preserving this facility and designing footings and foundations to avoid this facility.

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Tolling

The Transportation Technical Report, Section 1.1.8 Tolling, explains that both Washington and Oregon are authorized under the federal tolling program codified in 23 U.S. Code Section 129. Pre-tolling would commence when the project gets underway, in 2026. We learned from an IBR presentation that the Federal authorization for tolling was not granted for the Glenn Jackson Bridge on I-205. We know from previous economic studies conducted for Clark County that there were an estimated 65,000 daily trips from those commuting to Portland. These user groups will be impacted the most due to their daily commutes. The Transportation Technical Report (on page 3-19) does reveal the split in daily vehicle trips as 1-205 receives 55% of daily trips versus I-5 at 45%. There is limited discussion about the actual mechanics of the toll devices and whether they are just cameras or there are actual physical structures that need to be erected and maintained. There seems to be no discussion about the potential traffic pattern diversions of trips for those that are price sensitive to tolling that would shift over to I-205. We firmly believe that the tolling will unduly hurt Vancouver before any benefits can be realized. We recommend that the report evaluate the shift in vehicle patterns as a result of tolling.

Park and Ride Facilities

Chapter 2, Figures 2-11 and 2-23 depict three (3) park and ride facilities adjacent to The Waterfront Vancouver area. The Land Use Technical Report in Section 4.2.2.1 describes the potential facilities as providing 570 parking spaces. Figures 4-6 and 4-7 provide the most detailed outlines of the proposed locations. Table 3.3-4 provides the most complete list of land characteristics for each option. Site #1 is between Washington Street and Columbia Street appears to contain two property owners and two existing buildings, yet Figure 4-6 states "*no additional property impacts beyond local road improvement impacts*". This contradicts the information in Appendix Table A5 that lists the properties for acquisition.

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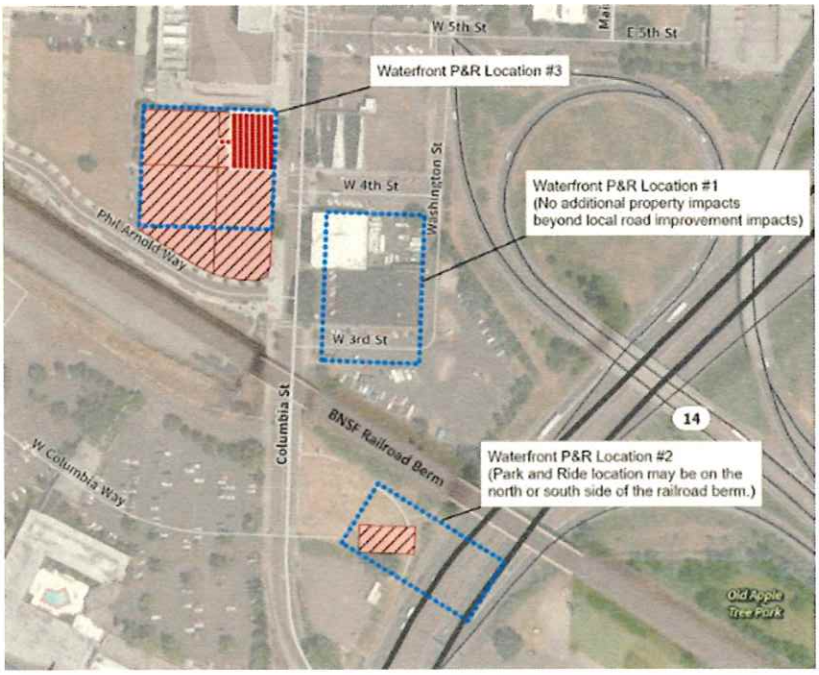
Site #2 is located either on the north or south side of the BNSF railroad berm, with the structure largely under the new I-5 bridge. Site #3 contains land and a building owned by the City of Vancouver and such parking to be incorporated within the "Gateway" project.



The impacts and any mitigation measures for these facilities are not disclosed in Section 3 of the document. The potential impacts beyond the construction phase would be realized by channeling traffic patterns with a concentration of vehicles entering and exiting the streets servicing them. What are the typical vehicle trips for a facility like this? Related to this is the visual appearance of such facilities and how they would meet City of Vancouver regulations for aesthetic design. The most important question not answered is why is a park and ride facility needed at this location instead of at the Evergreen terminus.

Temporary Staging

Section 3.3.4 identifies temporary construction easements in both Oregon and Washington. We are most concerned as to the activities that could or will take place on the easements abutting the south side of Block 2 at The Waterfront Vancouver and along Terminal 1 of the Port of Vancouver. The extent of easements are shown in the Land Use Technical Report in Figure 4-4 below with the red arrow showing the area of concern.



These easements abut The Waterfront Vancouver development and the intensity and durations of the uses on them will have a direct temporary impact on the ongoing functions of the project. This aspect of construction staging at this close location detracts users of The Waterfront Vancouver and will lead to unsightly views from the blocks acting as a deterrent to the user experience. We question if large vehicles will be delivering construction

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materials to these locations and if materials will be stored, stacked, piled or job trailers will erected. What might the impacts be to existing traffic patterns. Is there any construction fencing around the sites? Will they be illuminated and secured? What impacts will be anticipated from noise and vibrations? We also question if barges will be tied up at these locations and if so, for what time duration.

Visual Quality

The DSEIS in Section 3.9 discloses visual impacts from a variety of locations as shown on Figure 3.9-2. Two of the key viewpoints from our perspective are numbers 20 and 26, both looking from the waterfront project looking east and south towards the I-5 corridor.

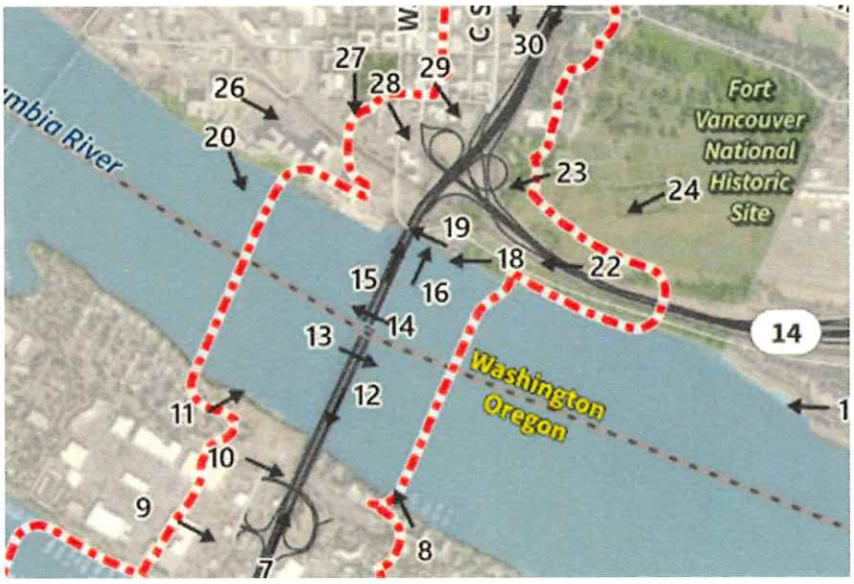

Table 3.9-6 identifies Key Vision Point (KVP) #20 as an "Adverse" degree of impact on Visual Quality. Key vision point #26 is identified on Table 3.9-7 as an "Adverse" degree of impact on Visual Quality as well. The report within Chapter 3, under the Vancouver Downtown Landscape Unit does not provide a photo simulation for either of these prominent locations. Instead, the photo simulations are from KVP #8 on the south shore of the Columbia, east side of I-5, looking north west. We believe the report should include similar photo simulations for KVP #20 and #26. We find that the Visual Quality Technical Reference Report does include existing KVP 20 in Figures 3-18 and 3-19 and KVP 26 within Figure 3-25. What is missing are the photo simulations of the three main bridge options from these key visual points. We strongly recommend that this be added to the report due to the significance of the population base and visitor activity at The Waterfront Vancouver. From a pure visual impact standpoint, the CWLLC prefers the Alternative Options 6 and 7 that are single level.

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We thank you for the opportunity to provide comments on the immense public works project that plays a vital role in both Oregon and Washington.

Regards,



Barry A. Cain
Manager of Columbia Waterfront LLC

Attachment: Lancaster Mobley Memo dated November 18, 2024

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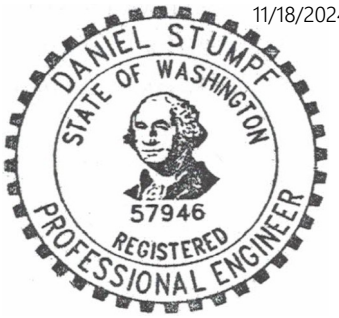
1130 SW Morrison St., Suite 318
Portland, OR 97205
503.248.0313
lancastermobley.com

Memorandum

11/18/2024



To: **Columbia Waterfront, LLC**

From: **Daniel Stumpf, PE**
Todd E. Mobley, PE

Date: **November 18, 2024**

Subject: **Interstate Bridge Replacement Program: Draft SEIS Comments**

Introduction

This memorandum is written to provide comments on the Interstate Bridge Replacement (IBR) Program Draft Supplemental Environmental Impact Statement (SEIS). Our review and comments focus on the transportation related portions of the SEIS, particularly as it relates to access and connectivity to the Vancouver Waterfront and surrounding neighborhoods.

Vancouver Waterfront & SEIS Timeline

Accurately quantifying and capturing the trips to and from the Vancouver Waterfront is a critically important element of the traffic analysis in the SEIS. This popular, high-density neighborhood is new, having started construction only shortly before the analysis for the SEIS began.

Construction started on the waterfront in 2016, with a grand opening in 2018. At that time, two restaurants were open for business. Now, only six years later, the waterfront is built, with 1,900 residential dwelling units, 138 hotel rooms, 63,000 square feet of office, and 121,000 square feet of retail. The adjacent Port of Vancouver development area includes the AC Marriot Hotel and ZoomInfo Blocks A and C, which adds 360,000 square feet of office, 15,000 square feet of retail, and another 150 hotel rooms.

According to the SEIS[1], Interstate 5 (I-5) mainline traffic counts were collected between 2018-2019, well before most of this development occurred. Additional counts were collected between 2021 and 2023 for both the I-5 mainline and locally impacted intersections, but it is not clear how volume adjustments were made to account for impacts associated with the COVID-19 pandemic while considering most area development had occurred post-2019. Section 1.3 of the SEIS *Transportation Technical Report* does suggest the analysis had considered impacts associated the Vancouver Waterfront project, Terminal 1 development, the Renaissance Boardwalk, and the Waterfront Gateway project, among other projects, but limited information pertaining to how they were included in volume projections was provided (e.g., were these projects incorporated in the 2018-2040/2045 Regional Transportation Plan modeling data or added to the collected counts by some other method).

[1] Interstate Bridge Replacement Program *Transportation Technical Report*, Table A-1 Data Collection Plan Summary

It is also unclear whether the study had taken into consideration future impacts associated with the entirety of the City of Vancouver's City Center Vision subarea plan, where approximately 2,000 additional PM peak hour trips still remain as vested for use by future development.

With traffic counts that occurred over as many as five years, spanning both the COVID pandemic and the vast majority of the Vancouver Waterfront and surrounding development, we are not able to confirm that the traffic data used in the analysis is accurate or representative of baseline or a reasonable estimation of future conditions.

Inclusion of C Street Ramps

The Vancouver Waterfront and downtown Vancouver currently enjoys convenient access to I-5 via the SR 14 interchange, where there are on ramps at the intersection of W 5th Street and Washington Street, and off ramps at E 6th Street and C Street. Collectively, these are referred to as the "C Street ramps". The modified LPA includes scenarios both with and without these ramps. We conducted a thorough review of how removal of these ramps would impact access to the Vancouver Waterfront.

The SEIS *Transportation Technical Report* included a review of traffic conditions and impacts to locally significant intersections within four separate subareas along/near the affected Interstate 5 corridor: Portland Mainland and Hayden Island (Subarea A), Columbia River Bridges (Subarea B), Downtown Vancouver (Subarea C), and Upper Vancouver (Subarea D). A total of 80 locally affected intersections were evaluated within the four subareas, noting revisions to existing intersections and the construction of new intersections may occur depending on the design that is implemented as part of the IBR project.

The SEIS *Transportation Technical Report* evaluated four scenarios for these intersections:

- Existing Conditions (i.e., 2019 No-build Conditions)
- Future 2045 No-Build Conditions
- Future 2045 Conditions with the modified Locally Preferred Alternative (LPA) bridge design without restrictions to the C Street I-5 ramps.
- Future 2045 Conditions with the modified LPA bridge design with restrictions to the C Street I-5 ramps.

Reporting specifically on the Vancouver/WSDOT intersections within Subareas B and C that would be impacted by the closure of the C Street ramps, Table 1 below summarizes the AM and PM peak hour operation of the intersections that were found to exceed adopted agency standards.

Table 1: Intersection Capacity Analysis Summary

Intersection		2019 Existing			2045 No-Build			2045 LPA			2045 LPA w/o C Street Ramps		
		LOS	Delay (s)	v/c	LOS	Delay (s)	v/c	LOS	Delay (s)	v/c	LOS	Delay (s)	v/c
AM Peak Hour													
22	Franklin Street at Mill Plain Boulevard	B	15	0.44	D	36	0.53	C	18	0.56	B	18	0.49
24	Washington Street at 15th Street	A	8	0.43	A	8	0.59	B	16	0.65	**F**	95	0.37
25	Main Street at 15th Street	A	6	0.43	B	14	0.56	C	35	0.63	**F**	100	0.49
28	Columbia Street at Mill Plain Boulevard	B	11	0.41	B	11	0.40	A	9	0.41	B	16	0.74
31	Broadway Street at Mill Plain Boulevard	A	6	0.31	A	7	0.33	A	7	0.33	B	13	0.72
34	I-5 NB Ramps at Mill Plain Boulevard	C	24	0.71	D	35	0.68	B	19	0.57	D	39	1.13
57	Columbia Shores Boulevard at SR 14 EB Off-Ramp	C	20	0.59	D	47	0.59	C	33	0.57	C	33	0.57
58	Columbia Shores Boulevard at Columbia Way	B	18	0.85	C	27	0.84	C	25	0.82	C	26	1.11
PM Peak Hour													
22	Franklin Street at Mill Plain Boulevard	C	26	0.37	B	16	0.39	B	19	0.44	**F**	>300	0.53
24	Washington Street at 15th Street	A	6	0.26	A	7	0.31	A	9	0.33	B	10	0.39
25	Main Street at 15th Street	A	10	0.37	B	11	0.45	B	10	0.46	B	14	0.53
28	Columbia Street at Mill Plain Boulevard	D	44	0.60	B	13	0.57	C	38	0.63	**F**	>300	0.78
31	Broadway Street at Mill Plain Boulevard	C	35	0.58	A	10	0.52	C	25	0.57	**F**	93	0.70
34	I-5 NB Ramps at Mill Plain Boulevard	C	27	0.84	C	29	0.75	C	29	1.01	**F**	183	1.07
57	Columbia Shores Boulevard at SR 14 EB Off-Ramp	D	40	0.68	**F**	127	0.78	**E**	63	0.69	**E**	58	0.73
58	Columbia Shores Boulevard at Columbia Way	**F**	>300	0.51	**F**	290	0.52	**F**	>300	0.48	**F**	>300	0.51

Table Notes: ***BOLDED/RED*** *text indicates intersection operation above adopted mobility standards.*

As shown above, the closure of the C Street ramps is projected to cause six intersections to exceed agency standards relative to all other analysis scenarios. Two other intersections are projected to exceed agency standards by 2045; however, the closure of the C Street ramps is not expected to improve operation to acceptable levels.

It is noted that the SEIS *Transportation Technical Report* mentions the above operation results are generally expected to under report actual operation at the study intersections since the analysis does not take into consideration potential queue spillback from the I-5 mainline. Quoting from sections 3.6.4 and 4.6.4.2 of the Transportation Technical Report:

> *3.6.4*
>
> *The study intersections in this section were analyzed without considering the impacts of freeway congestion spilling back onto local roadways. Section 3.3.4.5, Impacts to Local Roads, documents the locations and extents of freeway congestion spilling back onto the local roadways. Intersections that would be impacted by freeway congestion may operate worse than shown in the following section.*
>
> *4.6.4.2*
>
> *Removal of the C Street ramps would result in substantial impacts to the Mill Plain Boulevard and I-5 interchange and to the Mill Plain Boulevard (eastbound) and 15th Street (westbound) couplet west of I-5. The number of redirected trips from downtown Vancouver that would otherwise have accessed I-5 through C Street 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.*

Figure 4-18 of the SEIS Transportation Technical Report, shown below, visually depicts projected queues along Mill Plain Boulevard during the AM peak hour for the 2045 future year analysis scenarios. Note the scenario without the C Street ramps is expected to create the longest queues in the eastbound direction along Mill Plain Boulevard and in the southbound direction of intersecting cross-streets relative to all other analysis scenarios.

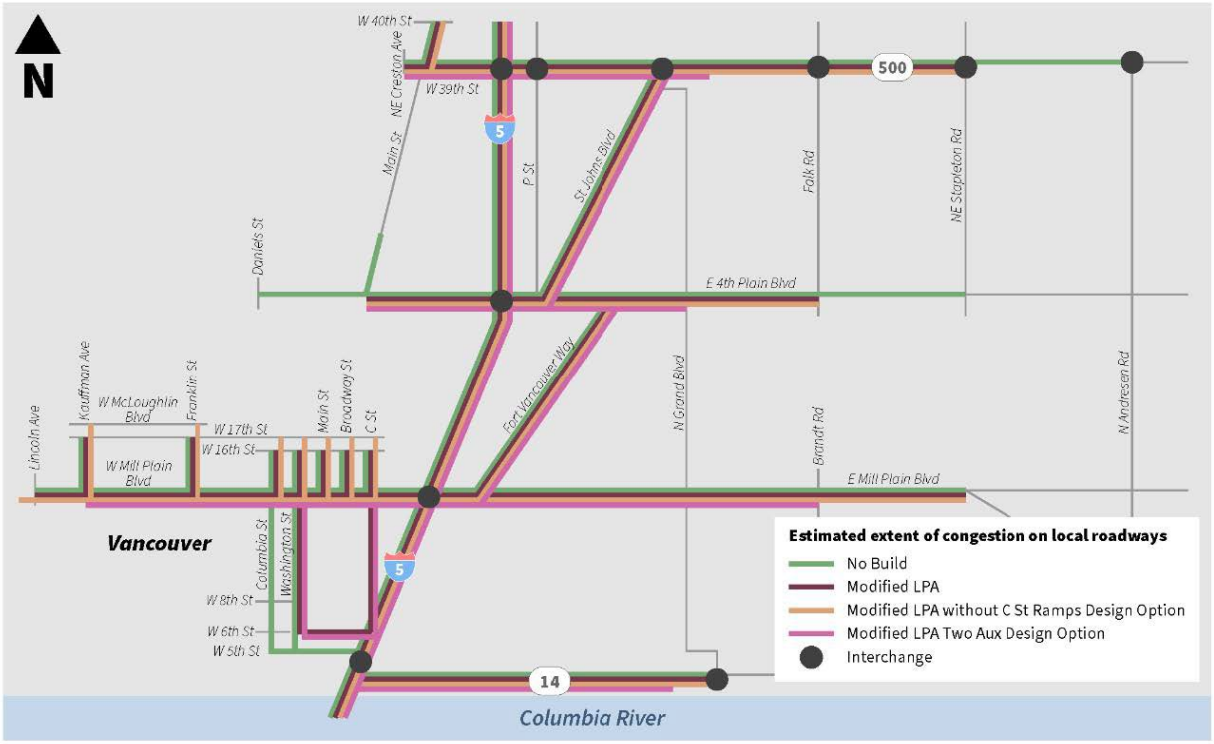


Figure 1: Figure 4-18, Transportation Technical Report

Per the above analysis findings, retaining the C Street ramps as an access point to/from I-5 is essential to maintain adequate operation of impacted intersections and reduce I-5 queue spillover impacts to local streets, particularly along Mill Plain Boulevard. The Vancouver Waterfront is a recently developed destination of travel, and closing the C Street ramps will unnecessarily burden Mill Plain Boulevard and intermittent streets/intersections between the I-5/Mill Plain Boulevard interchange and the Waterfront.

City of Vancouver Support for C Street Ramps

The City of Vancouver also has significant interest in ensuring safe and efficient access to the Vancouver Waterfront, Downtown Vancouver, Port of Vancouver properties and all of SW Vancouver. In materials and presentations made to various commissions within the City, staff has highlighted the poor operation that results from not including the C Street ramps in the Modified LPA. They have also comments and recommendations as follows[2]:

> *With respect to the C-Street Ramps design option, the City supports the Modified LPA, which includes these downtown ramp connections to I-5. The findings of the Transportation technical report in the SEIS clearly show multiple adverse impacts to the local street system without these connections. This impacts a primary freight corridor as well as transit service that operates in the downtown area. The placement of these ramp connections is not anticipated to result in a significant visual barrier as there will already be major structural elements associated with the westbound SR-14 to southbound I-5 ramp as well as the structure that will carry the light transit rail lines through interchange areas.*

[2] City of Vancouver Memorandum to Transportation and Mobility Commission, dated October 24, 2024

Park and Ride Lots

Three potential park and ride lots are identified near the future Waterfront Station, although the SEIS does state "up to one" park and ride could be built to serve the Waterfront Station[3]. The three locations under consideration are shown in Figure 1 below, labeled P&R 1a-c.



Figure 2: Excerpt from Figure 1-23, Transportation Technical Report

Park and ride locations are also planned at the Evergreen Station, which will be the northern terminus of the light rail line, at least as considered as a part of this project. Park and ride lots are most effective when they are located outside of the "ring of congestion" in cities and urbanized areas[4]. In this case, it does make sense to consider a park and ride facility to serve the terminus of the light rail line, but this would be more appropriately sited near the Evergreen Station only. One of the sites under consideration is adjacent to the Vancouver Community Library, which would make an excellent site for a co-located park and ride facility.

We would recommend strongly against locating a land-intensive, lower density, suburban treatment such as a park and ride lot in the Waterfront area. Land surrounding the Waterfront Station should be reserved for higher density urban development to complement the current development patterns that currently exist and are planned for this district. A park and ride lot would focus passenger vehicle trips in an area that should be emphasizing pedestrian, bicycle, micromobility, and transit usage.

Safety is a key component to the successful operation of park and ride facilities. Direction from the Washington Department of Transportation (WSDOT) for planning park and ride lots states that safety and security for people and personal vehicles is a *requirement* for park and ride facilities to be effective[5]. Maintaining a safe and comfortable environment for all people at passenger vehicle parking areas in dense urban areas is challenging at best.

Lastly, COVID-era changes in commuting and transit use should carefully be considered before committing valuable real estate to park and ride lots. Usage at other park and rides across the Portland and Vancouver areas is greatly reduced compared to pre-pandemic levels. For example, TriMet is actively planning for the redevelopment of multiple park and ride lots that are no longer viable for that use, due primarily to changes to commuting behavior and safety. Additionally, C-Tran has effectively removed all transit service to/from the

[3] Interstate Bridge Replacement Program *Transportation Technical Report*, Page 1-3

[4] Texas A&M Transportation *Institute Mobility Investment Priorities*, *System Modification Strategies*

[5] WSDOT Transportation Systems Management & Operations, *Park and Ride*, tsmowa.org

Salmon Creek Park & Ride, which previously offered two express bus service lines between Salmon Creek, downtown Vancouver, and downtown Portland.

Tolling

The SEIS and the *Transportation Technical Report* indicated that tolling would begin on the existing Interstate Bridge during construction of the Modified LPA[6]. The document speculates on the potential impacts of both tolling and construction, including how trips could divert, be made at different times of the day, be made via transit, or not occur at all. With a construction schedule that is estimated to last between 9 and 15 years, the disruptive combination of both tolling and construction is not a short term or insignificant consideration.

The real impacts to the Vancouver Waterfront and the downtown area specifically should be addressed and quantified in more detail, including the economic impacts to the area. For context, the Vancouver Waterfront has developed and become a regional draw and economic center for the City of Vancouver and Clark County over the course of approximately eight years. The combined impacts of tolling and construction could be twice as long.

Other Review Considerations

Several other items of consideration were noted when reviewing the SEIS *Transportation Technical Report*, more so related to transparency when conducting review and reconstructing methodologies used in preparation of the study. These items include the following.

Traffic Growth Assumptions

According to Section 4.6.3: Peak-Hour Traffic Forecasts, Table 4-24 provides a listing of AM and PM peak hour annual growth rates that were applied to the locally reviewed intersections. When comparing the total entering intersection volumes between the 2019 adjusted baseline volumes and the 2045 no-build volumes in Appendix D, significant variation between the back calculated growth rates and those listed in Table 4-24 were found. In some cases these variations were found to either be greater than or less than those listed in Table 4-24, regardless of whether or not the annual growth rates were applied to the 2019 baseline volumes in a linear or compounding manner.

Lancaster Mobley does not believe these growth rates were applied incorrectly to the intersections, rather it is unclear whether or not the growth rates reported in Table 4-24 are "rough" averages of growth that were applied to these intersection, if the methodology for applying growth rates was not applied to the total entering intersection volumes as a whole, or if some other methodology was used. Clarification for these discrepancies is recommended.

The growth calculations conducted to determine these discrepancies at several intersections in Vancouver are included as an attachment to this memorandum.

Volumes and Capacity Analysis

Several capacity analysis related items of interest were found when reviewing the report narrative and accompanying appendices:

[6] Interstate Bridge Replacement Program *Transportation Technical Report*, Section 5.11, Tolling and Diversion

- The traffic counts in Appendix D do not include counts details related to peak hour factors, heavy vehicle percentages, the day/month/year counts were collected, etc. For review and transparency purposes, access to these count details could be made available.
- The traffic counts in Appendix D are labeled as Existing, No-Build, MLPA, LPA 1, LPA 2, LPA 3. It's not clear for the MLPA and the LPA numbers which set of counts applies to which analysis scenario.
- When evaluating local intersection operation, the study relied on using SimTraffic methodologies to evaluate intersection delay and LOS, while using HCM 6th Edition and HCM 2000 methodologies were used to evaluate v/c ratios for unsignalized and signalized intersections, respectively.
    - According to section 7.6.1.1, justification for using SimTraffic in lieu of Synchro to evaluate intersection delay/LOS was due to Synchro's static input and output metrics which do not account for congestion and queue spillback between intersections. While this is a reasonable argument for using SimTraffic, it does raise the question of why queue spillback from I-5 was not considered in the SimTraffic analysis. Section 3.6.4 indicates that evaluating local congestion in a manner independent of I-5 congestion was intentional, but no specific reasoning for why was provided.
    - The HCM 6th Edition was used to evaluate unsignalized intersection v/c ratios. The current edition of the HCM is the 7th Edition, published in 2022, which should have been used to evaluate v/c ratios.
    - The HCM 2000 was used to evaluate v/c ratios for signalized intersections. Specific to the intersections under the jurisdiction of ODOT, the v/c ratios for signalized intersections could have been evaluated utilizing methodologies presented in ODOT *Analysis Procedures Manual* Version 2, section 13.4.4: Critical Intersection v/c Ratio.
- For review and transparency purposes, access to the 2021 signal timing plans used in the analysis should be made available.
- The local intersection performance results in Appendix E do not indicate what input parameters were incorporated to determine these results (e.g., turning movement volumes, peak hour factors, heavy vehicle percentages, signal timing, lane/traffic control configurations, etc.). For review and transparency purposes, access to these input parameters could be made available.

Summary & Conclusion

A summary of our review and resulting comments and recommendations are below.

1. Traffic volumes and forecast operations on the local transportation system in the vicinity of the Waterfront are uncertain, given data was collected over a five-year period that spans both the COVID pandemic and the majority of development in the area. To avoid the excessive adjustments to data in the current draft SEIS, it is recommended that new intersection turning movement counts in the vicinity of the Vancouver Waterfront and Downtown Vancouver be conducted and incorporated in the final SEIS.
2. The current draft SEIS shows that the impacts of removing the C Street ramps from the Modified LPA are significant and unacceptable. The City of Vancouver's review comments align with our concerns

about the poor access and failing facilities that would result. The analysis conducted to date is sufficient to show that removal of the C Street ramps is not realistic. It is recommended that the scenario without the C Street ramps is struck from the Modified LPA and is not considered in the final SEIS.

3. Locating park and ride facilities near the planned Waterfront Station is counter to the City of Vancouver's planning efforts that show no additional public parking structures are needed to meet current or projected demand. Further, these facilities detract from the City's vision of a pedestrian-oriented Waterfront and downtown. It is recommended that further analysis regarding park and ride locations in the final SEIS focus only on the proximity to the Evergreen Station.

4. The current SEIS intends to begin tolling during construction and prior to completion of the Modified LPA. The combined impacts of tolling *and* construction impacts are not analyzed in detail within the SEIS, but they would have a very significant impact on the Vancouver Waterfront and the downtown area. It is recommended that the timing of the start of tolling be reconsidered and that additional analysis, including an economic impact analysis of the combined effects, be included in the final SEIS.

5. The technical traffic analysis in the SEIS is large and detailed. There is no access to important data and technical analysis output to thoroughly review and understand how the analysis was conducted. It is recognized that including all of this information in the *Transportation Technical Report* may not be practical given the large amount of information and resulting pages, but providing separate technical appendices available for public download would provide the necessary level of transparency to better understand the analysis and rely upon the results and recommendations.

		AM Peak Hour						
		2021-2023 (2019 Baseline)	2045 No Build					2021-2023 (2019 Baseline)
ID	Intersection	Total Volumes	Total Volumes	Total Growth	Calculated Growth Per Year (Linear)	Calculated Growth Per Year (Compounded)	AM Peak-Period Annual Growth Rate per Table 4-24	Total Volumes
27	Mill Plain Blvd WB & C Street	1185	1820	53.59%	2.1%	1.7%	1.3%	1480
32	Mill Plain Blvd EB & C Street	1285	1430	11.28%	0.4%	0.4%	1.3%	2220
44	7th Street & C Street	290	455	56.90%	2.2%	1.7%	2.1%	240
50	6th Street & Broadway Street	505	810	60.40%	2.3%	1.8%	2.1%	360
51	6th Street & C Street	750	1150	53.33%	2.1%	1.7%	2.1%	525
53	Phil Arnold Way & Esther Street	85	165	94.12%	3.6%	2.6%	3.6%	175
54	Phil Arnold Way & Columbia Street	150	350	133.33%	5.1%	3.3%	3.6%	255
55	Columbia Way & Esther Street	95	210	121.05%	4.7%	3.1%	3.6%	310
56	Columbia Way & Columbia Street	150	360	140.00%	5.4%	3.4%	3.6%	265

Table 4-24 Traffic Volume Annual Growth Rates for the No-Build Alternative
Table 4-25 Traffic Volume Annual Growth Rates for the Modified LPA and Options

Linear Growth Rate Equation: "Annual Rate" = "Total Growth" / (2045 - 2019)
Compounding Growth Rate Equation: "Annual Rate" = ("Total Growth" + 1) ^ (1 / (2045 - 2019)) - 1

IBR Draft SEIS - RECORD #3199 DETAIL

First Name :	Sarah
Last Name :	Felix
Attachments :	DSEIS-3199_Felix_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #3199 DETAIL

Submission Date :	11/18/2024
First Name :	Sarah
Last Name :	Felix
Business/Organization/Agency :	None

Submission Input :

First Name:
Sarah

Last Name:
Felix

Business or Organization:
None

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
I am concerned that the current iteration of the Interstate Bridge Replacement (IBR) Lacks accessible connections to current paths and networks for active transportation users. There is also a problem with road users not being separated from freight routes - for example the current design for the ramp from Vancouver Wy to MLK North poses significant conflict with freight , as the proposed route travels down, across, & back up a freight-heavy on-ramp. Also,

Temperature and shade for active transportation users is needed. The ambient temperatures around & on the bridge will exceed 100 degrees in the summer. It is critical that active transportation users have shade to mitigate heat and weather impacts.

JCA comment #: 861

IBR Draft SEIS - RECORD #3200 DETAIL

First Name :	Stasia
Last Name :	Honnold
Attachments :	DSEIS-3200_Honnold_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #3200 DETAIL

Submission Date : 11/18/2024
First Name : Stasia
Last Name : Honnold
Business/Organization/Agency :

Submission Input :

First Name:
Stasia

Last Name:
Honnold

Email:
[redacted]

City:
[redacted]

Zip:
[redacted]

Topic Area:
Climate Change

Comment:
It is crazy to me that despite what we know about fossil fuels, air quality, climate change, and our impacts on the world that we're even considering a bridge option that would allow for MORE traffic rather than actively try to encourage less of it. Enhancing reliable transit, encouraging active transportation, and really putting work and money into making those options reliable, safe, and enjoyable would go a long way to achieving our climate goals--and would do so without necessitating spending $7.5billion.
The very, very long SEIS has a lot of words and yet somehow seems to overlook the very basic concept that more vehicles on the road leads to more fossil fuel burning, and that building more lanes of traffic induces driving demand. Can we please scale this back to an efficient design that prioritizes the things that are good for our environment, air quality, and quality of life (i.e. no more lanes; actively encourage transit and active transport by prioritizing safe and easy use of those options)?

JCA comment #: 860

IBR Draft SEIS - RECORD #3202 DETAIL

First Name :	Rita
Last Name :	Owens
Attachments :	DSEIS-3202_Owens_Original.pdf (12 kb)

IBR Draft SEIS - RECORD #3202 DETAIL

Submission Date : 11/18/2024
First Name : Rita
Last Name : Owens
Business/Organization/Agency :

Submission Input :

I agree with the forwarded email below.

Thank you for your consideration.

Rita Owens

From: Vote Before Tolls <info@votebeforetolls.org>
Sent: Monday, November 18, 2024 3:43 PM
To: Rita Owens <[redacted]>
Subject: Interstate Bridge – $4.5B in Tolls & Rising

Just a few more hours to comment ...
View this in your browser.<https://votebeforetolls.org?mailpoet_router&endpoint=track&action=click&data=WyIzMDQwIiwidHFzMXlpb2xweThndzRnNGdna2dvd3dzazR3Z3c4MGsiLCI3MSIsImNjYzRlMjRiNWVlZiIsZmFsc2Vd>
[Vote Before Tolls logo - Required by IP-31]<https://votebeforetolls.org?mailpoet_router&endpoint=track&action=click&data=WyIzMDQwIiwidHFzMXlpb2xweThndzRnNGdna2dvd3dzazR3Z3c4MGsiLCI3MSIsImQ3NWQ2NDFjYWM5MSIsZmFsc2Vd>
Greetings Rita,
A Quick Update

Vote Before Tolls Committee has intentionally been quiet these past few months as the November election drowned out our messaging. But that is the past and now it's time to ramp up our voice, presence, and impact.

First, let's be clear ... tolling is still coming to Portland and Oregon roads and highways. Gov. Kotek paused, but did not stop tolling. Tolling is a major multi-billion dollar topic at this winter's Oregon Legislative session.

Second, IP-31 needs your support to get on the '26 ballot. We did not have enough signature momentum to make this year's ballot, but we have just over 18 months to get on the '26 ballot. IP-31's Right to Vote assures we have a seat at the table to bring the public's perspective and common sense to all tolling planning & projects. Everyone who signed before August 2024 needs to sign again.
$9B I-5 Bridge Includes $4.5B in Tolls
... No Future Proofing in the Plan
SEIS Comment Period Closes at Midnight

Informed by this article<https://votebeforetolls.org?mailpoet_router&endpoint=track&action=click&data=WyIzMDQwIiwidHFzMXlpb2xweThndzRnNGdna2dvd3dzazR3Z3c4MGsiLCI3MSIsIjk2ZThkMTllNzM5NyIsZmFsc2Vd> by Lars Larson...

* ODOT, WADOT, and Governor Kotek are moving forward with plans for a new, but no bigger, Interstate Bridge over the Columbia river.
* Just 11 months ago the IBR project director Greg Johnson told us the bridge would cost $6B. Today's estimate is $9B and rising. While we admit construction costs are up - they are not up 50% in just ONE year!
    * Less than HALF that cost is already lined up. Oregon, Washington, and the Federal government have already chipped in.
    * The answer ... tolls on the backs and from the wallets of those who cross the bridge. The toll share was $1.5B last year, now tolling's share is up 300% to $4.5B currently and tolls will continue to be the "subtract answer" plugging the funding gap as project costs continue to rise.
* Tolls are currently estimated to peak at MORE than $9 dollars a day or more than $2,000 a year for a daily commuter with a few more inches of lane width but no more no more vehicle capacity.
    * These tolls will not sunset (stop) when construction costs are paid off – they will go on forever.
* The replacement bridge is planned to have 3 lanes north and south, the same as it did when the second span was opened 58 years ago in 1958. Does any politician think traffic will decline or the PNW region will not grow over the next 58 years? Adding one more lane each direction now is an incremental cost and will somewhat future proof the bridge.
* Light rail, at 1 billion a mile, is the most expensive light rail project on earth! Our leaders want us to pay $2B for this expansion and then to subsidize the fares of the travelers! The general public in SW Washington and those of us in Oregon don't want this expansion ... and we can't afford it.
    * TriMet already owns the Expo Center - I am sure we can triple the parking lot size there and add C-Tran busses to accommodate the few hundred riders who would use the Vancouver Max extension for less than a $1M per year ... 1/200 of the cost of extended light rail!
* Bridge tolls are planned start before the bridge construction. And it's not clear that the Glenn Jackson I-205 bridge will be tolled. Guess where the I-5 bridge traffic will go once tolls start?
* ODOT still has plans to toll I-5, I-205, Hwy 26, and Hwy 217 for “congestion relief”. More tolls will surely follow.

So Are We Opposed to an Earthquake Resistant and Traffic-Efficient New Bridge?

No, we absolutely agree that replacement bridge is necessary and we know we need to pay for it. But we don't want the current politician's boondoggle that costs more than we can afford. Common sense needs to prevail. The public demands a seat at the table to be involved in re-focusing reigning in this project. It's our bridge, our cash, and our table!

Since Vote Before Tolls Committee was founded in 2020 we have never been asked by planners to share and discuss our thoughts to help optimize any tolling project. We've attended dozens of "public meetings' where ODOT and state leaders listened and NEVER responded or asked us to engage on behalf of the public we represent. But to give them credit, the do count and take credit for our attendance as a "public contact".

IP-31 Covers ALL Oregon Roads, Bridges and Highways

The initiative give citizens the right to vote on all new tolls ... forcing accountability by ODOT, PBOT, Ti-MET, and our state legislators.

IP-31 is retroactive to 2018 and even covers bicyclists who seem to think they will never have to start paying for their infrastructure.

Oregon legislatative leadership shut down all discussions about tolling during last year's session and are on a path to do the same in 2025. IP-31 will call them to accountability for their many multi-billion dollar tolling spending sprees.

IBR ODOT SEIS Comment Period Closes at Midnight Tonight
ODOT Director Chris Strickler is asking the public to comment on the Supplemental Environmental Impact Statement to improve the IBR plan. The deadline is midnight tonight. We know it's short notice so we suggest you grab a thought or two from the list above. Or simply forward this email with a prefix saying you agree with it as follows:

Send your comments today by midnight ...
Email to:
DraftSEIS@interstatebridge.org<https://votebeforetolls.org?mailpoet_router&endpoint=track&action=click&data=WyIzMDQwIiwidHFzMXlpb2xweThndzRnNGdna2dvd3dzazR3Z3c4MGsiLCI3MSIsImI3ZDQzYTcwOTM3YiIsZmFsc2Vd>
with "Draft SEIS public comment" in the subject line

or post your comments to
https://InterstateBridge.org/DraftSEIS<https://votebeforetolls.org?mailpoet_router&endpoint=track&action=click&data=WyIzMDQwIiwidHFzMXlpb2xweThndzRnNGdna2dvd3dzazR3Z3c4MGsiLCI3MSIsIjAxMmUwZTVmYjYyZSIsZmFsc2Vd>

Let's get Signing!
We are actively gathering signatures for IP-31, for the 2026 ballot. Request your petitions here:
https://votebeforetolls.org/initiative/<https://votebeforetolls.org?mailpoet_router&endpoint=track&action=click&data=WyIzMDQwIiwidHFzMXlpb2xweThndzRnNGdna2dvd3dzazR3Z3c4MGsiLCI3MSIsImEwNDdkNjBmOTQ0NiIsZmFsc2Vd>
Your Donation Is Critical to a Successful 2026 Effort!
– Vote Before Tolls Committee is an Oregon PAC. The Political Tax Credit is a "free" contribution. Anyone can donate, and Oregon donors will get ALL* of your $100 contribution back as a tax credit on your 2024 Oregon taxes when you file next year (* $100 if married filing jointly, $50 if filing otherwise).
– Vote Before Tolls Foundation is an IRS approved 501c3 charity. You can take a traditional charitable deduction for donations to the Foundation. Donors can be from any state.
Vote Before Tolls PAC - Oregon donors eligible for $100 tax credit<https://votebeforetolls.org?mailpoet_router&endpoint=track&action=click&data=WyIzMDQwIiwidHFzMXlpb2xweThndzRnNGdna2dvd3dzazR3Z3c4MGsiLCI3MSIsIjhmMTAwOTYwODJjNSIsZmFsc2Vd>
Vote Before Tolls Foundation – Everyone can take a charitable contribution<https://votebeforetolls.org?mailpoet_router&endpoint=track&action=click&data=WyIzMDQwIiwidHFzMXlpb2xweThndzRnNGdna2dvd3dzazR3Z3c4MGsiLCI3MSIsImRjOTEwNjA1NDcxMCIsZmFsc2Vd>
[facebook]<https://votebeforetolls.org?mailpoet_router&endpoint=track&action=click&data=WyIzMDQwIiwidHF

zMXlpb2xweThndzRnNGdna2dvd3dzazR3Z3c4MGsiLCI3MSIsIjczYmY3OTcxMTA4OSIsZmFsc2Vd> [twitter]
<https://votebeforetolls.org?mailpoet_router&endpoint=track&action=click&data=WyIzMDQwIiwidHFzMXlpb2x
weThndzRnNGdna2dvd3dzazR3Z3c4MGsiLCI3MSIsIjc1YzEwOTQ0YzNjYiIsZmFsc2Vd> [instagram]
<https://votebeforetolls.org?mailpoet_router&endpoint=track&action=click&data=WyIzMDQwIiwidHFzMXlpb2x
weThndzRnNGdna2dvd3dzazR3Z3c4MGsiLCI3MSIsIjM1YjhjMzkyMjAwZiIsZmFsc2Vd>
View this in your
browser.<https://votebeforetolls.org?mailpoet_router&endpoint=track&action=click&data=WyIzMDQwIiwidHFz
MXlpb2xweThndzRnNGdna2dvd3dzazR3Z3c4MGsiLCI3MSIsImNjYzRlMjRiNWVlZiIsZmFsc2Vd>
Unsubscribe<https://votebeforetolls.org?mailpoet_router&endpoint=track&action=click&data=WyIzMDQwIiwidH
FzMXlpb2xweThndzRnNGdna2dvd3dzazR3Z3c4MGsiLCI3MSIsIjE2MzE2YmFjYWQ5YSIsZmFsc2Vd> |
Manage your
subscription<https://votebeforetolls.org?mailpoet_router&endpoint=track&action=click&data=WyIzMDQwIiwidH
FzMXlpb2xweThndzRnNGdna2dvd3dzazR3Z3c4MGsiLCI3MSIsImUzYjMyMmZmMWI4NyIsZmFsc2Vd>
[https://votebeforetolls.org?mailpoet_router&endpoint=track&action=open&data=WyIzMDQwIiwidHFzMXlpb2xw
eThndzRnNGdna2dvd3dzazR3Z3c4MGsiLCI3MSIsbnVsbCxmYWxzZV0]

IBR Draft SEIS - RECORD #3203 DETAIL

First Name :	T.J.
Last Name :	DeAngelis
Attachments :	DSEIS-3203_DeAngelis_Original.pdf (6 kb)

IBR Draft SEIS - RECORD #3203 DETAIL

Submission Date : 11/18/2024
First Name : T.J.
Last Name : DeAngelis
Business/Organization/Agency :

Submission Input :

I absolutely agree that replacement bridge is necessary and we know we need to pay for it. Let’s use facts and common sense to demand a seat at the table to be involved in re-focusing realignment in this project. It's our bridge, our cash, and our table!

Let’s do this!

Tammy De Angelis
[redacted]

Be kind to everyone.

IBR Draft SEIS - RECORD #3204 DETAIL

First Name :	Calvin
Last Name :	Hoff
Attachments :	DSEIS-3204_Hoff_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #3204 DETAIL

Submission Date : 11/18/2024
First Name : Calvin
Last Name : Hoff
Business/Organization/Agency :

Submission Input :

First Name:
Calvin

Last Name:
Hoff

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
Hello - I have significant concerns regarding the bridge replacement. I am worried lane expansion would lead to induced demand for single-occupancy motor vehicles, increasing car transportation in the region's impact on carbon emissions. Likewise, I am supportive of designs that reduce the impact of emissions and particulates onto nearby areas. In regards to design specifics, I want to ensure there is good connectivity between bicycle users and public transit service to make the connection between these transportation types seamless. Additionally, as someone who has used the existing bridge to travel by bicycle, I recommend ensuring ample space for multiple bicyclists and pedestrians to reduce conflicts between these travel types. Also, I would be more likely to use the bridge and visit nearby neighborhoods in Vancouver, Washington if bicycle/pedestrian access to downtown Vancouver was simple.

JCA comment #: 859

IBR Draft SEIS - RECORD #3205 DETAIL

First Name :	Daniel
Last Name :	Frye
Attachments :	DSEIS-3205_Frye_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #3205 DETAIL

Submission Date : 11/18/2024
First Name : Daniel
Last Name : Frye
Business/Organization/Agency :

Submission Input :

First Name:
Daniel

Last Name:
Frye

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Induced Demand

Comment:
We know from experience across the country that freeway expansion induces additional demand, increases VMT and greenhouse gas emissions. The current models being used to model traffic on the current design do not account for that induced demand. Hence, those models are not providing realistic estimates for future travel on the I-5 corridor. This must change. We must have realistic modelling that account for induced demand to ensure that we understand the consequences of building a large freeway expansion around the

needed seismically stable replacement bridge.

JCA comment #: 858

IBR Draft SEIS - RECORD #3206 DETAIL

First Name :	Steve
Last Name :	Manlow
Attachments :	DSEIS_3206_LCFRB_Original.pdf (228 kb) Draft SEIS Public Comment, Lower Columbia Fish Recovery Board, Interstate Bridge Replacement Project.pdf (228 kb)

Lower Columbia Fish Recovery Board

November 18, 2024

Interstate Bridge Replacement Program
500 Broadway, Suite 200
Vancouver, WA 98660

Subject: Draft SEIS Public Comment, Lower Columbia Fish Recovery Board, Interstate Bridge Replacement Project

To Whom it May Concern,

The Lower Columbia Fish Recovery Board (LCFRB- Link) appreciates the opportunity to comment on the Draft Supplemental Environmental Impact Statement (SEIS) for the Interstate Bridge Replacement (IBR) Project. As one of the eight regional salmon recovery organizations in Washington State, the LCFRB is charged by statute with developing and facilitating implementation of a recovery plan for Endangered Species Act (ESA) listed populations of chum salmon, Chinook salmon, coho salmon and steelhead, within the Lower Columbia Region. In that capacity, the LCFRB led the collaborative development of the state and federally adopted Washington Lower Columbia Salmon Recovery and Fish & Wildlife Subbasin Plan (recovery plan) and is now charged with overseeing and coordinating plan implementation and adaptive management. The focus of this locally-developed recovery plan is to restore salmon and steelhead to healthy and harvestable levels. Our work is guided by a 15-member board that includes representatives from local governments, the WA State legislature, the Cowlitz Indian Tribe, hydropower operators, environmental and landowner interests, and the public. Given the potential for this proposal to produce adverse impacts to ESA listed salmon and steelhead in the Columbia River basin, we offer the following comments for your consideration.

Section 3.16 (Ecosystems) of the SEIS provides details regarding acreage of impact across impact categories. These impacts include, but are not limited to, the following: 1.04 acres of new shading at the water surface; a net increase of approximately 8.22 acres of elevated overwater shading; approximately 2.06 acres of temporary benthic habitat displacement; and, approximately 15.61 acres of temporary overwater shading. The presence of construction barges and other structures is not considered in these figures yet will produce similar ecological impacts (increased predatory fish habitat, interference with migration, noise disturbance, etc.) during the construction period. The overall project will take 9-15 years to complete, and it is estimated there will be at least portions of two adjacent bridges for between 4.5 and 9 years. These impacts should not be viewed as temporary, as they will affect multiple life cycles of salmon and steelhead. While the Draft SEIS acknowledges these impacts, there is little information provided on how they may adversely impact salmon, steelhead and other fish species. The Final SEIS should therefore include a more detailed assessment of impacts to these species, and incorporate methods such as Habitat Equivalency Analysis to quantify them to the degree possible for purposes of determining minimum mitigation obligations.

Based on Mitigation Work Group discussions to date, we understand the project sponsors are considering using the proposed Wapato Valley Mitigation and Conservation Bank to partially offset project impacts. This ecologically diverse bank is geomorphically situated and functionally designed to provide benefits to all ESA-listed salmon and steelhead, as well as other aquatic life, that would be impacted by the IBR project. This bank would provide a high level of certainty that impacts to salmon, steelhead and aquatic habitats would be ecologically offset, compared to other mitigation banks in the region that are not located immediately adjacent to the mainstem Columbia River. We therefore encourage the sponsors to further explore potential use of this bank for mitigating impacts on the Washington side of the river.

Earlier in the review process, the project sponsor noted that the IBR program does have a commitment to implementing measures above and beyond regulatory minimums to improve baseline habitat conditions. However, this conservation initiative is not referenced in the Draft SEIS. In our role as both a Lead Entity and Regional Recovery Organization, the LCFRB is well suited to support such an initiative in Washington State. Since our inception in 1998, the LCFRB has facilitated the allocation of over $200 million to salmon and steelhead recovery projects through competitive grant-based programs we directly manage. Please let us know if this is a concept you would be interested in exploring further with the LCFRB.

Thank you for the opportunity to provide these comments. If you have any questions or need additional information, please feel free to contact via phone at (360) 425-1553, or via email at smanlow@lcfrb.gen.wa.us.

Sincerely,



Steve Manlow
Executive Director

cc: LCFR Board
Christina Donehower, Cowlitz Indian Tribe
Bill Sharp, Yakama Nation Fisheries
David Troutt, Nisqually Indian Tribe
Bryce Glaser, WDFW
David Howe, WDFW
Morgan Morris, Lower Columbia Regional Fish Enhancement Group

Lower Columbia Fish Recovery Board

November 18, 2024

Interstate Bridge Replacement Program
500 Broadway, Suite 200
Vancouver, WA 98660

Subject: Draft SEIS Public Comment, Lower Columbia Fish Recovery Board, Interstate Bridge Replacement Project

To Whom it May Concern,

The Lower Columbia Fish Recovery Board (LCFRB- Link) appreciates the opportunity to comment on the Draft Supplemental Environmental Impact Statement (SEIS) for the Interstate Bridge Replacement (IBR) Project. As one of the eight regional salmon recovery organizations in Washington State, the LCFRB is charged by statute with developing and facilitating implementation of a recovery plan for Endangered Species Act (ESA) listed populations of chum salmon, Chinook salmon, coho salmon and steelhead, within the Lower Columbia Region. In that capacity, the LCFRB led the collaborative development of the state and federally adopted Washington Lower Columbia Salmon Recovery and Fish & Wildlife Subbasin Plan (recovery plan) and is now charged with overseeing and coordinating plan implementation and adaptive management. The focus of this locally-developed recovery plan is to restore salmon and steelhead to healthy and harvestable levels. Our work is guided by a 15-member board that includes representatives from local governments, the WA State legislature, the Cowlitz Indian Tribe, hydropower operators, environmental and landowner interests, and the public. Given the potential for this proposal to produce adverse impacts to ESA listed salmon and steelhead in the Columbia River basin, we offer the following comments for your consideration.

Section 3.16 (Ecosystems) of the SEIS provides details regarding acreage of impact across impact categories. These impacts include, but are not limited to, the following: 1.04 acres of new shading at the water surface; a net increase of approximately 8.22 acres of elevated overwater shading; approximately 2.06 acres of temporary benthic habitat displacement; and, approximately 15.61 acres of temporary overwater shading. The presence of construction barges and other structures is not considered in these figures yet will produce similar ecological impacts (increased predatory fish habitat, interference with migration, noise disturbance, etc.) during the construction period. The overall project will take 9-15 years to complete, and it is estimated there will be at least portions of two adjacent bridges for between 4.5 and 9 years. These impacts should not be viewed as temporary, as they will affect multiple life cycles of salmon and steelhead. While the Draft SEIS acknowledges these impacts, there is little information provided on how they may adversely impact salmon, steelhead and other fish species. The Final SEIS should therefore include a more detailed assessment of impacts to these species, and incorporate methods such as Habitat Equivalency Analysis to quantify them to the degree possible for purposes of determining minimum mitigation obligations.

Based on Mitigation Work Group discussions to date, we understand the project sponsors are considering using the proposed Wapato Valley Mitigation and Conservation Bank to partially offset project impacts. This ecologically diverse bank is geomorphically situated and functionally designed to provide benefits to all ESA-listed salmon and steelhead, as well as other aquatic life, that would be impacted by the IBR project. This bank would provide a high level of certainty that impacts to salmon, steelhead and aquatic habitats would be ecologically offset, compared to other mitigation banks in the region that are not located immediately adjacent to the mainstem Columbia River. We therefore encourage the sponsors to further explore potential use of this bank for mitigating impacts on the Washington side of the river.

Earlier in the review process, the project sponsor noted that the IBR program does have a commitment to implementing measures above and beyond regulatory minimums to improve baseline habitat conditions. However, this conservation initiative is not referenced in the Draft SEIS. In our role as both a Lead Entity and Regional Recovery Organization, the LCFRB is well suited to support such an initiative in Washington State. Since our inception in 1998, the LCFRB has facilitated the allocation of over $200 million to salmon and steelhead recovery projects through competitive grant-based programs we directly manage. Please let us know if this is a concept you would be interested in exploring further with the LCFRB.

Thank you for the opportunity to provide these comments. If you have any questions or need additional information, please feel free to contact via phone at (360) 425-1553, or via email at smanlow@lcfrb.gen.wa.us.

Sincerely,



Steve Manlow
Executive Director

cc: LCFR Board
Christina Donehower, Cowlitz Indian Tribe
Bill Sharp, Yakama Nation Fisheries
David Troutt, Nisqually Indian Tribe
Bryce Glaser, WDFW
David Howe, WDFW
Morgan Morris, Lower Columbia Regional Fish Enhancement Group

IBR Draft SEIS - RECORD #3207 DETAIL

First Name :	Marnie
Last Name :	Glickman
Attachments :	DSEIS-3207_Glickman_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #3207 DETAIL

Submission Date : 11/18/2024
First Name : Marnie
Last Name : Glickman
Business/Organization/Agency :

Submission Input :

First Name:
Marnie

Last Name:
Glickman

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
The IBR proposal needs to be streamlined. Yes, we should replace the bridge, but must do so without freeway expansion. Induced demand is real. We need homes, not expanded freeways. We've got to prioritize safety for cyclists and pedestrians to get to Vision Zero. We need to lead by reducing air pollution, not increasing air and water pollution. We also must protect peregrine falcons and other wildlife.

JCA comment #: 857

IBR Draft SEIS - RECORD #3208 DETAIL

First Name :	Rudy
Last Name :	Jeffery
Attachments :	DSEIS-3208_Jeffery_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #3208 DETAIL

Submission Date : 11/18/2024
First Name : Rudy
Last Name : Jeffery
Business/Organization/Agency :

Submission Input :

First Name:
Rudy

Last Name:
Jeffery

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Topic Area:
Transportation

Comment:
The decisions we make now will affect the future use of this bridge. Put people and bikes on the top priority to get through this chaos safely and with minimal “moving parts.” Like an elevator. Thanks, let’s start over and work together.

JCA comment #: 856

IBR Draft SEIS - RECORD #3210 DETAIL

First Name :	Donna
Last Name :	Hansen
Attachments :	DSEIS-3210_Hansen_Original.pdf (6 kb)

IBR Draft SEIS - RECORD #3210 DETAIL

Submission Date : 11/18/2024
First Name : Donna
Last Name : Hansen
Business/Organization/Agency :

Submission Input :

We do not want to pay road tolls period. I am old enough to remember the interstate bridge toll. I do not want to pay a toll on 205 every time I go from home to my doctor. I am sure people who go to work near a toll will feel an unjust financial burden. Most of us will go around the tolls through neighborhoods…I will. The economy creates a burden on us elders already.

Donna Hansen
[redacted]

Sent from Donna

IBR Draft SEIS - RECORD #3211 DETAIL

First Name :	Mary
Last Name :	Lewis
Attachments :	DSEIS-3211_Lewis_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #3211 DETAIL

Submission Date : 11/18/2024
First Name : Mary
Last Name : Lewis
Business/Organization/Agency :

Submission Input :

The Interstate Bridge Replacement Proje is pushing a bridge design that will be 3 times the height of the current bridge, many lanes wider, costing $7-$12 billion, not be fully earthquake-proof, and will take at least 15 years to build.

For those of us living on Hayden Island, this will be a nightmare. The construction and the bridge replacement both will damage the local environment, making our homes unliveable: the noise, the dirt in the air from the current traffic over the bridge tripled or quadrupled, and the simple fact of adding many construction vehicles to our smaller, privately held and privately maintained roads will make our lives on Hayden Bay a living nightmare.

In addition, the residents on Hayden Island will have tolls to pay for every trip taken as we cannot simply "take a different route". For the residents here, particularly those on limited incomes, getting groceries, medicines, items needed for day-to-day living, etc. will greatly increase in price simply because of the cost of tolls coming and going from our homes.

This project may relieve traffic congestion slightly on the bridge itself. As one who drives I-5 regularly, fixing congestion problems needs to include all of the many on-ramps dumping traffic onto I-5, from the Rose Quarter north to the bridge, in a very short distance. This is visible to all who travel it; when you reach the Washington side, there are very few on-ramps and a lot less congestion getting onto the freeway.

With all the construction causing traffic nightmares, we are likely to lose the businesses we have left here, devastating our local island economy even more than it is now. We have had businesses close due to the fact the soil is shifting, making buildings unsafe.

Add the construction, the vibrations, and heavy equipment use, and Hayden Island may end up a ghost town no one wants to visit or live. Also, our homes here on the island will drop in value immediately, which means the resale on our homes will be devastating for over 15 years. This is untenable for the residents of our island.

Please, do not replace this bridge with a monster build. There are other ways around this, many of which have been expressed during its public comment time. Add auxiliary lanes for congestion relief, and make light rail a separate project, particularly since Washington does not really want it and it is being added only to benefit Tri-Met. Taking an unusable plan from the Columbia River Crossing project and reworking what was there/what did not work, instead of looking at other possibilities for crossings is not the answer for those of us who have to

live with it daily.

We like where we live, as I am sure you like where you live. Tearing apart our entire way of life for a 15-minute shorter commute is not the answer.

Mary Lewis
[redacted]

IBR Draft SEIS - RECORD #3212 DETAIL

First Name :	Jeremy
Last Name :	Simer
Attachments :	DSEIS-3212_Simer_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #3212 DETAIL

Submission Date : 11/18/2024
First Name : Jeremy
Last Name : Simer
Business/Organization/Agency :

Submission Input :

First Name:
Jeremy

Last Name:
Simer

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
I support the positions outlined by No More Freeways and the Just Crossing Alliance for the Interstate Bridge Replacement.

JCA comment #: 855

IBR Draft SEIS - RECORD #3213 DETAIL

First Name :	Maurice
Last Name :	Reintjes
Attachments :	DSEIS-3213_Reintjes_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #3213 DETAIL

Submission Date : 11/18/2024
First Name : Maurice
Last Name : Reintjes
Business/Organization/Agency :

Submission Input :

I'm an engineer: I'll be brief and factual

Item
Problem
Alternative and Solution
Alt Advantage
1
Cost
Build a tunnel
Lower cost, allows ships to clear without traffic disruption, less visually intrusive
2
Does not fix the existing problems of capacitry
Add lanes
Solves Traffic congestion for next 5 generations
3
Light Rail, busses, bikes and pedestrians near traffic
Reuse the existing bridges for bikes, pedestrians public transit
Provides a serene pedestrian and bike experience.

-M

IBR Draft SEIS - RECORD #3214 DETAIL

First Name :	Holly
Last Name :	Chamberlain
Attachments :	DSEIS_3214_HT_FOE_DOE_Original.pdf (11 mb) image001.png (9 kb) FINAL_The_Historic_Trust_IBR_ Comments_ Providence_ Academy_ DOE_ and_FOE_Forms_ 11182024.pdf (9 mb)

THE HISTORIC TRUST

November 18, 2024

Interstate Bridge Replacement Program
Attn: Draft SEIS Public Comment
500 Broadway, Suite 200
Vancouver, WA 98660

VIA Email: draftseis@interstatebridge.org

Dear Interstate Bridge Replacement Program staff,

Please find following the comments of The Historic Trust on the Interstate Bridge Replacement (IBR) Project Draft Supplemental Environmental Impact Statement in regard to Appendix C, Section 106 Documentation Forms, and Appendix D, Finding of Effect Forms to the Historic Built Environment Technical Report. Specifically, the comments are on the Section 106 Documentation Form and Section 106 Level of Effect Form for Providence Academy.

Please note that the November 18, 2024 letter from Schwabe, Williamson and Wyatt, P.C. attorney Lawson E. Fite to IBR Program regarding Comments of The Historic Trust on the Draft Supplemental Environmental Impact Statement and associated documents is incorporated with these comments.

We look forward to continuing discussions in regard to project impacts on the Providence Academy site, and mitigating them, and are happy to provide additional information and answer questions. Thank you for your review.

Best regards,

Temple Lentz, President/CEO
360-992-1805

cc: culturalresources@interstatebridge.org

CELEBRATING HISTORY. INSPIRING TOMORROW.

750 Anderson Street Vancouver, WA 98661 | 360.992.1800 | www.thehistorictrust.org

THE HISTORIC TRUST
CELEBRATION · EDUCATION · PRESERVATION

Comments on
Interstate Bridge Replacement Program
DSEIS Historic Built Environment Technical Report Appendix C
Section 106 Documentation Form
House of Providence/Providence Academy (WA 150)
(DAHP Project No. 2020-12-07501)

11/18/2024

These comments incorporate the November 18, 1924 letter from Schwabe, Williamson and Wyatt, P.C. attorney Lawson E. Fite to IBR Program regarding Comments of The Historic Trust on the Draft Supplemental Environmental Impact Statement and associated documents (following).

Comments on **Physical Description** section:

p. 1
Historic use should also include: Domestic – institutional housing; Religion – church school

The Alterations & Dates section could be shortened to reflect the parcel as it is now to reduce confusion. The Sisters had many more buildings on the larger site over time which were removed at various times.

Thus, correct to:

1875, construction of Sacred Heart Garden;

1891, Addition of west auditorium wing; construction of 1943-44 Kindergarten Building (Gymnasium);

c. 1901 – kitchen addition
Date from typescript in collection of Providence digital archives:
Morrow, Sister Mary Claver. *Providence Academy Vancouver, Washington 1874-1950.*
p. 9
https://www.providence.org/-/media/project/psjh/providence/socal/files/about/providence-archives/providence-academy-18741950-by-sr-mary-claverweb.pdf?rev=68e6b47d87434e0ea11b408b01b9c8ac&hash=CABC021045E8EFC8612DA0A7DA2EE4E2

1956 – 62 kitchen addition – unknown to what this refers; large kitchen addition dates to c. 1901.

2017-18 south gallery porch renovation and roof replacement – existing combination of composition shingles and standing seam metal changed to all standing seam metal in keeping with original 1874 zinc roof

2019 – interior rehabilitation of chapel and ballroom and associated electrical, HVAC, and AV upgrades

2019 – former Century House Restaurant (El Presidente), built in 1976 at southwest corner of parcel, demolished

2020-2022 – rehabilitation and replacement of the majority of the north gallery porches; installation of ADA ramp in northwest corner

2022-2023 – reconstruction of western gallery porches and change in orientation of entrance access from west to north

2023 – renovation and expansion of southeast parking lot, including removal of eastern portion of hedge and curb bordering E. Evergreen Blvd.

Add in if necessary to refer to larger original site in this section:

c. 1974 – construction of west, north (west and north parking areas now on separate parcel) and southeast parking lots

2006-2009 – This was prior to Trust ownership, which started in 2015. We are unsure as to which former buildings this refers, except for the c. 1945 well house.

2022 – Demolition of Laundry Building and Boiler Building/Smokestack (site now on separate parcel)

Styles: Georgian, French Colonial

p. 3 – Physical Description
Line 1 Correction: The House of Providence (Providence Academy) is a commercial property...

Lines 3, 4, 5 – Is a correction needed here to describe the current boundaries of the parcel?

Lines 6 -7 Correction: ...1873-1874, the secondary Kindergarten Building (Gymnasium) built in 1943-1944. The grounds south of the Academy include the 1875 Sacred Heart Garden, composed today of a heart-shaped asphalt perimeter and north – south concrete central walkway with a central circular concrete garden, lawn, and a graveled area on which stood a now-demolished 1976 restaurant.

Lines 9 and 10: The parking lots to the west are connected to the Aeon Apartments and date to c. 2023. The northern parking areas are no longer part of the Academy property.

Line 13: Georgian Revival is the most common primary architectural style applied to the Academy, in such sources as Orthel, Bryan D. Providence Academy. Vancouver, Washington: SAH Archipedia. 2012. https://sah-archipedia.org/buildings/WA-01-011-0031

Line 20: Unclear as to what kitchen renovation this refers; a kitchen renovation did take place in c. 1901.

Lines 28 and 29: According to Providence Archives digital collection photograph Item Number 22.A2.43, at least a portion of the porches on the east side of the north wing were still there in 1966 when the school closed.

Lines 29, 30, and 31: Correction – The c. 1962 roof, composed of a combination of standing seam metal and composition shingles, was replaced 2017-18 by The Historic Trust. The south gallery porches were replaced in kind in 2017 as part of the same project. The northwest and northeast sections of the north porches were rehabilitated and replaced between 2020 and 2022; the ADA ramp at the inside northwest corner was installed as part of the same project.

P. 5, lines 4, 5, and 6 - edits
...However, significant interior spaces such as the chapel and ballroom (auditorium) were rehabilitated in 2019 for continued use as event spaces, with repairs undertaken with in-kind materials and faux painting applied to return the chapel altar and ballroom columns to a more original appearance.

P. 5 - edits
Original and early moved in outbuildings on the House of Providence property (including a barn, stone root cellar, and the convent building from the original St. James mission site near Fort Vancouver) were installed over time, and removed as community needs changed. Several of the early outbuildings located to the northeast of the House of Providence have been recently demolished. The c. 1945 well house which replaced the 1902 water tower over the well dug in 1902 was demolished between 2006 and 2009. The c. 1887 Laundry Building (IBR Map ID WA 150b) and 1910 boiler house/smokestack (IBR Map ID WA 150c) were demolished in 2023 (Figure 19).

Providence Archives digital collection photograph 22.A1.5 c. 1920 shows the water tower still there.
https://providencearchives.contentdm.oclc.org/digital/collection/p15352coll3/id/428/rec/355

Providence Archives digital collection photograph 22.D2.80 c. 1945 shows that the well house has replaced the water tower.
https://providencearchives.contentdm.oclc.org/digital/collection/p15352coll3/id/715/rec/459

"Around City and County." *Vancouver Weekly Columbian*. 1 May 1902. P. 3
112-feet deep well sunk at the Academy by J.J. Healy.

Blank, Carla and Tania Martin. *Storming the Old Boys' Citadel*. Montreal: Baraka Books. 2014 p. 78

1902 - Mr. Goss built the water tower.

Note: the exact date of construction of the Laundry Building has not been determined. Laundry was originally done inside the House of Providence. ("Laying the Cornerstone of the Orphan Asylum at Vancouver," *Catholic Sentinel,* September 26, 1873, p. 1). However, the Laundry Building had certainly been constructed by 1888 as the Sanborn for that year includes it.

Line 14 – edit
...It has a hollow clay tile exterior...

Line 23 – 24
Evidence indicates that the 1978 National Register nomination overstates the amount of formal landscaping at the House of Providence. The only parterre for which there is any evidence is the c. 1875 Sacred Heart Garden. The other gardening seems to have been of a utilitarian food production nature as the Sisters had many mouths to feed. There were also play areas for the children. The Sisters had first occupied the Academy in 1874. An 1875 news article ("House of Providence." *Catholic Sentinel.* 17 June 1875) refers to the grounds being graded, and thus not planted extensively at that point. The Sacred Heart Garden was created c. 1875. An 1876 entry in the *Providence Academy Vancouver Chronicles* describes the Sacred Heart Garden and notes that the Sisters were concerned about seeming extravagant in light of needing to raise money for so many other things, including finishing the building.

"May our descendants not find strange that which at first could seem to be an extravagant expense in the present circumstances; and may they know that the plot of land was prepared by the toil of our good catholic soldiers and that the plantings were a donation of Mr. Haden, a Protestant friend who at the time of the collection for the Convent generously offered to later procure for us all the plants, or ornamental or fruit trees, the latter best suited our needs and we had our choice. May God bless his charity for what he does for our little orphans and in exchange may He let him savor the sweetness of Heaven."

Thus, they did not have money or time for extensive landscaping in the early days of operation of the Academy and had to rely on volunteers and donated plants to create the Sacred Heart Garden. An 1885 entry in the *Providence Academy Vancouver Chronicles* refers to one parterre. Over time the Sisters did more basic landscaping. Historic photos in the Providence Archives digital collections over time show planted areas, lawns, and play areas, but nothing formal other than the Sacred Heart Garden.

Line 25 – The Garden was an early feature but not quite original.

P. 5 Line 29 and p. 6 Lines 1 – 6
This photo has been misinterpreted. The iron fence and columns described mark the western boundary of the U.S. Army's Vancouver Barracks (see guard house at right of center). Everything in the foreground is U.S. Army property. The apparently wooden fence beyond is the boundary for the Academy property. Trees in the Sacred Heart Garden are visible beyond the Academy fence. Providence Archives digital archives photograph 22.K1.1 c. 1892 is the oldest image of which the Trust is aware in which a viewer can get a glimpse of the Sacred Heart Garden pathways.

P. 6 Lines 7-8 The photo in footnote 21 used here for describing the south landscape is identified in the Providence Archives digital collection as being from the 1920s, not the 1910s. The same image is numbered 22.J2.1 and is dated c. 1939. Thus, the information should be ascribed to c. 1920 or later.

Lines 13 and 14 - See earlier comment regarding the National Register nomination overstating the amount of formal landscaping.

Lines 20 and 21 – The 1976 restaurant was not demolished to provide parking but rather to

prepare for the landscape renovation planned for 2025.

P. 7, Line 3 – The name of Aegis has been changed to Aeon.

Lines 4 and 5 – edits: Historic grounds features that remain include the original perimeter of the Sacred Heart Garden, now covered in asphalt, and its central north-south walkway and circular flower bed, and lawn. The mortared....

Lines 10 and 11 – The western portions of hedge and curb were removed by Marathon in accordance with the City of Vancouver's requirement for installation of a particular sidewalk design relating to the *Vancouver City Center Vision* report called "Heritage Sidewalk."

Comments on **Integrity** section:

P. 7, Lines 20 through 24 - Mention for context in the introduction of this section that the majority of the House of Providence's alterations were done well over 50 years ago, and in the case of just the large 1891 addition, 133 years ago. Furthermore, the alterations, which include the addition of indoor plumbing, reflect the typical changes required by the Sisters of Providence to fulfill their mission and meet sanitary standards that evolved over time, along with accomplishing needed building upkeep. Many of the alterations are on the rear of the building and are not visible from the primary facade.

Lines 23 and 24 Correct to state that the original roof was zinc. The third roof, installed in 2017-2018, was returned to metal.

Line 24 – Correct to state that the Sisters of Providence made changes to the interior necessary to house and educate students, and fulfill their mission of service to the community. All of these changes would have been made 58 or more years ago.

Line 24 – Correct to state that interior changes made to accommodate the commercial uses starting c. 1974 were relatively minor; many spaces stayed the same size.

Lines 29 and 30 - Correct to state that the 1891 west addition originally had a porch walkway on the first level.

Lines 29 and 30 - Correct to indicate that the original roof was zinc. Therefore, the current standing seam metal roof which replaced an existing roof of standing seam metal and composition shingles returns the roof to its original material.

Lines 34 and 35 - See earlier comment regarding the National Register nomination overstating the amount of formal landscaping.

Line 36 – The western and northern areas which were parking lots are not on the current parcel.

Pp. 7 and 8, Lines 36 and 37, and p. 8, Line 1 - Correct to indicate that the oval outline is the original perimeter of the Sacred Heart Garden and the north-south walkway an original path through the garden.

P. 8, Lines 5 through 7 - Correct to indicate that the landscape features of central walkway and

oval outline are remainders of the Sacred Heart Garden.

Line 7 - See earlier comment regarding the National Register nomination overstating the amount of formal landscaping. The western and northern areas which become parking lots are not park of the current parcel.

Lines 11 to 13 – Correct to include the remaining elements of the Sacred Heart Garden as important to show workmanship.

Lines 14 and 15 – Correct to note that the parcel is a different size and does not include the entire historic size of the site, and that the addition of modern structures nearby indicate the typical changes over passage of time in an urban setting.

Lines 19 and 20 – Correct to note that three owners over the life of an 151-year-old building is an unusually low number of owners for a building of its age, and acknowledge that an adaptive change to commercial use is not unusual as a technique for saving an historic building and passing it on to the future.

Lines 23 and 24 – Correct to note that the Sisters of Providence added and removed buildings to meet their needs and fulfill their mission prior to subsequent ownership. The current parcel does not include the areas where the buildings were removed.

Comments on **Statement of Significance**

P. 8 Line 3 – Correction/addition: The House of Providence was also a day school.

P. 9 Lines 1 through 4 – Correction: Designed by Mother Joseph, the first woman architect in the west and possibly the nation, the Academy is the oldest and most intact of the two remaining examples of 19th century humanitarian, medical, and educational facilities built in the Pacific Northwest by the SOP, the earliest of such organizations in Washington Territory. Additionally, at the time of the building's construction, its scale and architectural design made it an exceptional and substantial undertaking in the small settlement of Vancouver, Washington, and in the greater Pacific Northwest.

P. 10 Line 5 - Correction: ...daughter of a carriage-maker...

Lines 12 and 13 - Correction: ...Oregon, SOP buildings in Spokane and Walla Walla, Washington, and more.

Line 30 - Correction: ...twentieth century, some services were phased out or moved to other locations due to changes in local and state public provision of social, educational, and humanitarian services.

Pp. 10 Lines 33 and 34, and p. 11 Lines 1 and 2 - Correction: The school peaked in attendance during World War II with the huge influx of defense workers to Vancouver, an important home from community, attracting an enrollment of 900-1000 students. ("Providence: A Silent Centennial." *The Columbian*. 3 September 1974, p. 2.) The House of Providence's grade school and some boarding school operations were gradually discontinued in the 1950s as additional parochial schools were constructed in Vancouver. The SOP continued to operate a single-gender high school for girls until 1966.

P. 11 Lines 3 and 4 - Addition: The Kindergarten Building, built 1943-44 to help provide education for the extremely large addition to the local population of children of World War II defense workers, housed a kindergarten classroom from 1944-1948, supporting the activities of the SOP Kindergarten Department.

Lines 10 and 11 - Addition: ...for modern uses. After an attempt to redevelop the entire site with a variety of civic uses such as the city hall, Hidden turned to rehabilitating the Academy for adaptive reuse for small businesses, both retail and office, beginning in 1974. ("Providence: A Silent Centennial." *The Columbian*. 3 September 1974, p. 2.)

Line 13 - Correction: ...complete by 1974.

Lines 14 and 15 - Correction: The Hidden family continued to rehabilitate and rent spaces from the 1970s into the 2000s, adding the event spaces for rental in 1977. (Burnett Bob. "The Academy." *The Columbian*. 28 January 1977, p. 56.)

Lines 15 through 18: The Kindergarten Building was also leased to tenants, including Montessori schools, schools for children with special needs, and arts-oriented schools from 1978 to 2024.

Line 21, and later Federal references - Correct to delete Federal. Mother Joseph was more influenced by her background growing up in Quebec and seeing the buildings in Montreal than American Federal architecture.

P. 12 First paragraph - Correct to discuss Mother Joseph's background in Montreal.

Lines 24 through 27 – The version of the site map in WISAARD does not include the word intrusion in regard to the Kindergarten Building. The version in the DOE does. It is unclear when the word intrusion was added, and by whom. In any event, the Kindergarten Building was not yet 50 years old when the 1978 nomination was written. It must be evaluated in light of how old it is at present.

Line 30 - The Trust disagrees with concluding the period of significance in 1924. The period of significance should go to 1966, the conclusion of the SOP's direct association with the property, and their educational mission.

P. 13 Paragraph 1 - The Trust disagrees with concluding the period of significance in 1924. The period of significance should go to 1966, the conclusion of the SOP's direct association with the property and the conclusion of its primary function as a school. Additionally, the Kindergarten Building embodies an important role in the World War II era which transformed Vancouver, by serving as an educational site for children of the huge influx of defense workers as well as local children. Today, it is a rare remaining World War II-era building in downtown Vancouver, as well as the adjacent Vancouver Barracks. The Kindergarten Building was not yet 50 years old when the 1978 nomination was written. It must be evaluated in light of how old it is at present.

Paragraph 2 - Unsure of the intended meaning of sentence 1 in line 17.

The discussion of Mother Joseph should include her groundbreaking role as an early woman architect.

Paragraph 3 - This section should include a discussion of the c. 1875 Sacred Heart Garden in a national context, as being the oldest Euro-American designed formal landscape in the western United States in continuous use, and designed by a woman.

Lines 30 and 31 - Correction: ....as well as the c. 1875 construction date of the Sacred Heart Garden.

Lines 36 through 38 - See earlier comment regarding the National Register nomination overstating the amount of formal landscaping.

The Sacred Heart Garden retains sufficient integrity to convey its significance in landscape architecture.

Line 41 - The Trust disagrees with concluding the period of significance in 1924. The period of significance should go to 1966, the conclusion of the SOP's direct association with the property, and their educational mission.

P. 14, Lines 1 through 6 - The Trust disagrees with concluding the period of significance in 1924. The period of significance should go to 1966, the conclusion of the SOP's direct association with the property, and their educational mission.

Lines 17 through 19 - The character-defining landscape elements primarily encompass the Sacred Heart Garden. The "oval drive" marks the outside perimeter of the garden. The central walkway and circular flower bed are part of the original garden design. Additional research is needed to determine what if any portions of the stone pillars flanking the street entrance are original.

Lines 21 through 24 - The Trust disagrees with concluding the period of significance in 1924. The period of significance should go to 1966, the conclusion of the SOP's direct association with the property, and their educational mission.

The Kindergarten Building should be considered contributing for its role representing the immense and transformative impacts on Vancouver of World War II. It was built directly in response to the need for additional educational facilities created by the huge influx of home front defense workers into Vancouver. Additionally, it is a rare surviving example of a World War II era building in downtown Vancouver and the adjacent Vancouver Barracks. The Kindergarten Building was not yet 50 years old when the 1978 nomination was written. It must be evaluated in light of how old it is at present.

P. 25, Figure 10 - Change caption of Figure 10 to: View of House of Providence c. post-1891 from the southeast at a location inside the federal property of Vancouver Barracks.

P. 34 - The version of this map on-line through WISAARD does not include the word "intrusion." It is unclear when the word was penciled in, and by whom. However, even if considered an intrusion at the time of the 1978 nomination, the Kindergarten Building is now more than 50 years old and must be considered in connection with its current age.

THE HISTORIC TRUST
CELEBRATION · EDUCATION · PRESERVATION

Comments on
Interstate Bridge Replacement Program
DSEIS Historic Built Environment Technical Report Appendix D
Section 106 Level of Effect Form
House of Providence/Providence Academy (WA 150)
(DAHP Project No. 2020-12-07501)

11/18/2024

These comments incorporate the November 18, 1924 letter from Schwabe, Williamson and Wyatt, P.C. attorney Lawson E. Fite to IBR Program regarding Comments of The Historic Trust on the Draft Supplemental Environmental Impact Statement and associated documents (following).

Comments on **Introduction** section:

P. 2 Paragraph 2

The Historic Trust disagrees with the recommended finding of No Adverse Effect on Providence Academy.

Comments on **Identification and Description of Historic Property** section:
Note: more complete comments on the property description are included in the Trust's comments on the Section 106 Determination of Eligibility Form

P. 4 Line 21 Correct sentence to characterize the Academy as a commercial property.

Lines 31 through 34 Unsure to what the word "schoolhouse" is referring in this context. Correct to: Numerous outbuildings were also constructed on the grounds or moved to the grounds of the House of Providence to support the institution's operations. A barn, root cellar, convent, and wellhouse have been removed, along with other buildings. The c. 1887 Laundry Building and 1910 boiler house and polygonal smokestack that stood northeast of the primary building were demolished in 2022.

Lines 35 and 36 Correct to: ...House of Providence that remains, although it was constructed in 1943-44 and therefore dates to after the property's initial period...

Lines 36 through 39
Evidence indicates that the 1978 National Register nomination overstates the amount of formal landscaping at the House of Providence. The only parterre for which there is any evidence is the c. 1875 Sacred Heart Garden. The other gardening seems to have been of a utilitarian food production nature as the Sisters had many mouths to feed. There were also play areas for the

children. The Sisters had first occupied the Academy in 1874. An 1875 news article ("House of Providence." *Catholic Sentinel.* 17 June 1875) refers to the grounds being graded, and thus not planted extensively at that point. The Sacred Heart Garden was created c. 1875. An 1876 entry in the *Providence Academy Vancouver Chronicles* describes the Sacred Heart Garden and notes that the Sisters were concerned about seeming extravagant in light of needing to raise money for so many other things, including finishing the building.

"May our descendants not find strange that which at first could seem to be an extravagant expense in the present circumstances; and may they know that the plot of land was prepared by the toil of our good catholic soldiers and that the plantings were a donation of Mr. Haden, a Protestant friend who at the time of the collection for the Convent generously offered to later procure for us all the plants, or ornamental or fruit trees, the latter best suited our needs and we had our choice. May God bless his charity for what he does for our little orphans and in exchange may He let him savor the sweetness of Heaven."

Thus, they did not have money or time for extensive landscaping in the early days of operation of the Academy. An 1885 entry in the *Providence Academy Vancouver Chronicles* refers to one parterre. Over time the Sisters did more basic landscaping. Historic photos in the Providence Archives digital collections over time show planted areas, lawns, and play areas, but nothing formal other than the Sacred Heart Garden.

P. 4 Line 43 Correct to: A 2023 renovation of the southeast parking lot resulted in removal of some of the lawn on the south side of the Kindergarten Building, and consequent relocation of the south sidewalk.

P. 5 Line 1 Correct to: ...landscape elements include lawn and those of the c. 1875 Sacred Heart Garden - the outer perimeter, now covered in asphalt, central north-south walkway, circular central garden, as well as...

Line 6 Correct gymnasium to Kindergarten Building (Gymnasium).

Paragraph 3 - The version of this map on-line through WISAARD does not include the word "intrusion." It is unclear when the word was penciled in, and by whom. However, even if considered an intrusion at the time of the 1978 nomination, the Kindergarten Building (Gymnasium) is now more than 50 years old and must be considered in connection with its current age.

Lines 18 and 19 –The Kindergarten Building (Gymnasium) was built in 1943-44.

Lines 20 and 21 – As it is unclear as to when the word "intrusion" was added to the map, we cannot know what the nomination author was thinking.

Lines 30 through 33 - The Trust disagrees with the DOE's recommendation to conclude the period of significance in 1924. The period of significance should go to 1966, the conclusion of the SOP's direct association with the property, and their educational mission thereat.

P. 6 Lines 5 and 6 - The Trust disagrees with concluding the period of significance in 1924. The period of significance should go to 1966, the conclusion of the SOP's direct association with the property and the conclusion of its primary function as a school. Additionally, the Kindergarten

Building is a contributing building as it played an important role in the World War II era which transformed Vancouver, by serving as an educational site for children of the huge influx of defense workers as well as local children. Today, it is a rare remaining World War II-era building in downtown Vancouver, as well as the adjacent Vancouver Barracks. The Kindergarten Building was not yet 50 years old when the 1978 nomination was written. It must be evaluated in light of how old it is at present.

Comments on **Assessment of Effects** section:

P. 6 Paragraph 6
The Trust disagrees that the subsurface easement will not have an effect on the Academy and the Kindergarten Building. The Trust maintains that the Kindergarten is a contributing building.

P. 6, Paragraph 7 and p. 7 paragraph 1
The proposed temporary easement may adversely effect the southern boundary by damaging the Sacred Heart Garden and southern property edge. The commitment to restore any damage to pre-construction conditions must include the Sacred Heart Garden. Additionally, changes to the sidewalk will need to meet the city of Vancouver's requirement for installation of a Heritage Sidewalk.

P. 7 Paragraph 2, Lines 18 through 20
The Trust is concerned that introduction of new atmospheric and audible intrusions could diminish the organization's ability to retain office and event venue renters. Revenue from these activities help support preservation of the building and the Trust's ability to steward it now and for future generations. More dirt and noise will make it more difficult to rent offices and event venues.

P. 7 Paragraph 3
The Trust does not agree that the possible westward shift and accompanying construction vibrations will have No Adverse Effect on contributing buildings. The Trust maintains that the Kindergarten Building is a contributing building. Furthermore, the shift would bring construction vibrations closer to the Academy and the Kindergarten, both built of unreinforced masonry, and threaten their structure. If the property taking required removal of the Kindergarten Building, loss of an historic building and the income derived from rentals thereof would result. Though the southwest parking lot is not historic, loss of any portion would result in less parking rental income and less availability of parking for building tenants and their business clients, visitors, and event venue renters and their guests.

P. 8 Paragraph 1
The Trust is also concerned about any damage to the Sacred Heart Garden resulting from the proposed temporary easement along the southern boundary, and urges reevaluation of the Finding of Effect.

Schwabe

November 18, 2024

Lawson E. Fite
Admitted in Oregon, Washington and Montana
D: 503-796-3760
C: 503-568-6694
lfite@schwabe.com

VIA E-MAIL AND CERTIFIED MAIL –
RETURN RECEIPT REQUESTED

Interstate Bridge Replacement Program
Attn: Draft SEIS Public Comment
500 Broadway, Suite 200
Vancouver WA 98660
DRAFTSEIS@INTERSTATEBRIDGE.ORG

RE: Comments of The Historic Trust on Interstate Bridge Replacement Program ("IBR")
Draft Supplemental Environmental Impact Statement ("DSEIS")
Our File No.: 140050-285772

Dear IBR Program:

The Historic Trust ("THT" or the "Trust") submits these comments on the DSEIS as it relates to Providence Academy, a property owned by the Trust. These comments are supplementary to, and incorporate by reference, the Trust's comments regarding compliance with Section 106 of the National Historic Preservation Act, including the Trust's letter of August 7, 2024. Included with this letter are the opinions of two experts, Erickson Engineering and Continuum Preservation Consulting, that demonstrate errors in the finding of no adverse effect and the period of significance under the NHPA. They also demonstrate project effects that IBR has failed to disclose and analyze in the DSEIS.

As a general matter, THT looks forward to completion of a replacement I-5 bridge to enhance regional transportation of people and goods and to allow more people to experience Vancouver's historic resources. The Trust offers the following comments on the DSEIS, which are intended to minimize and/or mitigate adverse impacts on Providence Academy, such as physical, auditory, atmospheric, vibration, and visual intrusions. Additionally, THT advocates strongly for funding for construction of the community connector between downtown Vancouver and the Vancouver National Historic Reserve as a necessary step to ensure the most seamless link between two important civic sites.

Mitigation proposed to date by the Project emphasizes documentation rather than preservation, and overlooks adequate preservation and protection of the Providence Academy site. Investing in standing buildings is greatly needed and very publicly-visible and impactful. Direct physical preservation is long-term and takes into account the long-term impacts of new bridge construction.

The Historic Trust continues to appreciate the opportunity to comment on project planning documents. We are disappointed that previous efforts to correct errors on the project's records

related to the Providence Academy have not been reflected in the DSEIS. The inaccuracies in project research and documentation negatively impact this historic resource and potentially bring irreversible harm to an irreplaceable resource. We look forward to the opportunity to collaborate on productive solutions.

The NEPA process is separate and distinct from the NHPA process and imposes requirements to take a hard look at effects on cultural resources in NEPA documents.[1] An SEIS must include a "full and fair discussion of the potential effects of the project to cultural resources…."[2] "Agency officials should ensure that preparation of … an EIS and record of decision (ROD) includes appropriate scoping, identification of historic properties, assessment of effects upon them, and consultation leading to resolution of any adverse effects."[3] Below we have highlighted areas where the DSEIS's discussion of cultural resources is inadequate or needs correction.

Comments on Executive Summary

Page S-21: Number of NHRP-eligible historic built environment resources affected in columns 2-9 should be increased to 13, as Providence Academy should be added for all.

Comments on Chapter 2 (Alternatives)

THT does not support the westward shift alternative under any scenario. The westward shift increases the likelihood of severe adverse effects on The Academy and is likely to violate section 4(f) of the DOT Act, as discussed below.

Comments on Appendix C. Conceptual Design Drawing

The Historic Trust has previously expressed concern about this drawing and the impact it shows on the Providence Academy site. Project staff indicated the plan was conceptual and that it would be updated in the DSEIS, but the drawing has not changed. At the Academy site, this drawing appears to show infrastructure impact running through the edge of the Kindergarten Building. As this is a contributing historic resource, it should be mitigated in the Programmatic Agreement. Infrastructure also appears to project a takings of the eastern edge of the new parking lot and the southern edge of the property. The Historic Trust is renovating the southern landscape in 2025, and the project must keep the Trust whole for all impacts to the parking lot, the buildings, and the landscape, including changes made in 2025. Further, when and if the project damages or replaces the sidewalk on Evergreen, it should be replaced to the City of Vancouver's standards of "Heritage Sidewalk".

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[1] *See, e.g., Oglala Sioux Tribe v. U.S. Nuclear Regul. Comm'n*, 45 F.4th 291, 301 (D.C. Cir. 2022); *Ctr. for Biological Diversity v. U.S. Bureau of Land Mgmt.*, 746 F. Supp. 2d 1055, 1096 (N.D. Cal. 2009).
[2] *Indigenous Env't Network v. United States Dep't of State*, 347 F. Supp. 3d 561, 581 (D. Mont.) (citation omitted).
[3] 36 C.F.R. § 800.8(a)(3).

Comments on DSEIS Chapter 3.8 (Cultural Resources)

General comment: All versions of bridge construction plans will have impacts on the Providence Academy (Academy) site, including both the Academy building and the Kindergarten, requiring mitigation for vibration, audible, visual and atmospheric effects. Accordingly, a finding of no adverse effect is not appropriate. As the attached letter from Erickson Engineering states, the potential negative effects on The Academy and the Kindergarten from the Modified LPA are potentially severe and irreparable.

Table 3.8-1, Column 3, Modified LPA Effects:

Providence Academy should be included as having Adverse Effect, and the number of resources affected increased to 13.

Table 3.8-5, Washington Historic Built Environment Resources, Page 3.8-21 Map ID 150, Property ID 18827 House of Providence/Providence Academy:

The project incorrectly lists ending year built as 1930. The Kindergarten Building was constructed 1943-44. We have previously submitted this correction to the project and the correct date is acknowledged in the updated Finding of Effect (FOE) form. This date is important, and part of the history that makes this secondary building a contributing resource that must be acknowledged. *See* Letter from Continuum Preservation Consulting, November 11, 2024. The Kindergarten Building is referred to as an "intrusion" in the FOE form, with the word attributed to the 1978 nomination. We have not been able to find a reference to the Kindergarten Building anywhere in the nomination calling it an intrusion. Furthermore, the 1978 date of nomination preparation means that the Kindergarten Building was not 50 years of age at the time, which was and is the threshold for National Register eligibility except in rare exceptions. Today, the Kindergarten Building is 81 years old.

Page 3.8-26 Historic Built Environment Resources:

The Providence Academy site should be included in the list of resources that will experience Adverse Effect, as the information provided in the DSEIS about the physical impact of construction and operation of the project on the main and secondary building is not sufficient to determine whether or not the buildings will be damaged.

Table 3.8-9 Direct Effects of the Modified LPA on Washington Historic Built Environment Resources, Page 3.8-39 Map ID 150, Property ID 18827 House of Providence/Providence Academy:

The Project has incorrectly determined that the secondary building, the Kindergarten, is non-contributing. The project's Finding of Effect is based on the incorrect application of Period of Significance. The Period of Significance should conclude in 1966 consistent with the final year of the official association of the Sisters of Providence with the site, and the closure of the school, and thus include both the main building and the Kindergarten Building. In point of fact, the Sisters of Providence, and the Providence health network, remain connected to the site through present-day, by leading multiple Pilgrimage Tours for network employees every year. The Kindergarten Building is within the 100-foot boundary of the construction area and subject to adverse impacts from construction. The determination of No Adverse Effect is incorrect for this resource. Further, technical information provided in the DSEIS is insufficient to determine No Adverse effect on the Providence Academy. *See* Letter from Erickson Engineering.

The project's focus on a hedge and curb represents a misdirection and focus on the wrong priorities. The project should be concerned about the concussive impacts of construction vibration on the historic built environment, and cumulative effects.

Comments on DSEIS Section 3.11 (Noise and Vibration) and Supporting Documents

General comment:

The maximum construction noise levels noted on page 3.11-33 far exceed unacceptably high noise levels. The Providence Academy serves commercial tenants in the main building and in the Kindergarten Building. Similarly, the Academy has a robust schedule of event rentals which help support preservation of the building and connect people with the history of the site. The Kindergarten Building sits within the 100-foot buffer, and the main building is just 200 feet from the 100-foot buffer. NEPA mitigation for the project should include remedy for the likely loss of rent revenue from tenants who will choose to relocate during construction due to inability to conduct business during construction, and event venue renters who will choose an alternate location.

Page 3.11-33 Construction Vibration:

The project here does not include reference that The Historic Trust has indicated concern about vibration impacts on the Kindergarten Building and the main Academy Building. The Kindergarten Building is within the 100-foot buffer zone, and is made of hollow clay tile. This brittle building material is very susceptible to precisely the type of vibration indicated in the DSEIS, and should be mitigated. The main Academy building is unreinforced masonry, sitting less than 300 feet from the construction area. The project does not address vibrations carrying underground through clay soil, nor the probable impacts on this irreplaceable historic resource.

Noise and Vibration Technical Report Page 7-40

7.9.2.1 Regulatory Requirements, second bullet: how does the property owner access this monitoring and/or ensure it is being done properly? Additionally, what is the remedy when vibrations cause damage? For both the Academy and the Kindergarten, the Historic Trust seeks a pre-construction survey, post-construction survey, and input on and access to the vibration monitoring placement and data.

Comments on DSEIS Chapter 3.23 (Cumulative Effects)
P. 3.23-3, bullet point seven:

Should read: Aeon mixed-use development (Vancouver, west of I-5).

The Aegis project was renamed Aeon. The project was not built in conjunction with Providence Academy. Aeon and the Academy have separate owners (respectively Marathon Acquisition and Development LLC and The Historic Trust) and are on separate parcels.

Comments on DSEIS Chapter 4 (Draft Section 4(f) evaluation

General Comment: If "No Adverse Effect" on Providence Academy site through the Section 106 process means the determination that there is *de minimis* impact, and thus no prudent avoidance alternatives are needed nor planning to minimize harm to the property, this is a significant oversight on the part of the project. This determination, which poses the threat of significant harm to one of the most historically significant properties in the Pacific Northwest, is based on an incorrect interpretation of the Register nomination and Period of Significance. Corrections to site history provided by The Historic Trust have not been fully incorporated into all portions of the DSEIS.

Section 4(f) of the Department of Transportation Act prohibits approval of a transportation project using "land of an historic site of national, State, or local significance" unless:

> (1) there is no prudent and feasible alternative to using that land; and
> (2) the program or project includes all possible planning to minimize harm to the park, recreation area, wildlife and waterfowl refuge, or historic site resulting from the use.[4]

These requirements may be satisfied by finding a project has de minimis impact.[5] For historic sites, de minimis impact may be established by compliance with the NHPA and an appropriate finding of no adverse effect.

[4] 49 U.S.C. § 303(c), codification of Pub. L. No. 89-670, 80 Stat. 934 § 4(f), as amended.
[5] 49 U.S.C. § 303(d)(1)(A).

Because, as described here and elsewhere, the finding of No Adverse Effect on The Academy is inadequate and unsupported, the project does not comply with section 4(f). "This language is a plain and explicit bar to the use of federal funds for construction of highways through parks [and historic sites]—only the most unusual situations are exempted."[6] The "prudent and feasible alternative" language means "the Secretary cannot approve the destruction of parkland [or historic sites] unless he finds that alternative routes present unique problems."[7] This means that physical intrusion into The Academy property must be avoided.

Chapter 4.1.4 Constructive Use:
Section (e)(3):

It is unclear from the minimal level of detail presented in the DSEIS whether or not the southeast parking lot at the Providence Academy will be impacted. For the same reason, it is not clear whether the planned fire access lane at the eastern edge that is contractually required in an agreement with the planned Aeon apartment complex to the north will be impacted, nor access to the Kindergarten Building. Without knowing those answers, it cannot be determined if a Constructive Use occurs under this item.

The Period of Significance proposed by the project is incorrect, and the Kindergarten Building is a contributing resource. Accordingly, it should be recorded as experiencing an Adverse Effect.

Section (e)(4):

It is unclear from the minimal level of detail presented in the DSEIS whether or not the vibrations from the construction and/or operation of the project will substantially impair the use of the property, both the main Academy building and the Kindergarten Building. Without knowing those answers, it cannot be determined if a Constructive Use occurs under this item. The Period of Significance proposed by the project is incorrect, and the Kindergarten Building is a contributing resource. Accordingly, it should be recorded as experiencing an Adverse Effect.

We include a letter from our structural engineer, who presents an alternative opinion to that offered by the Project, and suggests incomplete analysis by the Project.

Chapter 4.2.2, Table 4-2 Summary Information About Section 4(f) Historic Sites (p.4-24):

The summary information in the Description column for site WA 150 is incorrect. The description should read as follows:

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[6] *Citizens to Pres. Overton Park, Inc. v. Volpe*, 401 U.S. 402, 411 (1971), *abrogated in other part by Califano v. Sanders*, 430 U.S. 99 (1977).
[7] *Id.* at 413.

> The House of Providence (Providence Academy) is currently a commercial property owned by the non-profit The Historic Trust. Historically, the property was built and managed by the Sisters of Providence as a school, orphanage, and administrative headquarters. The main building, constructed between 1873 and 1874 and with a large addition in 1891, is an ornate, three-story Georgian Revival building with basement and attic that is built of unreinforced brick and shows the influence of the French Colonial architectural style. The ancillary Kindergarten Building, constructed 1943-44, is a one-story vernacular building (with basement) which is built of unreinforced hollow clay tile. It is now also a commercial building but remained in educational uses until 2023, with some occasional short periods of vacancy.

Chapter 4.3.5, Table 4-5 Summary of Section 4(f) uses:

For House of Providence/Providence Academy, preliminary determination that double-deck fixed span with one auxiliary lane, C Street ramps, and I-5 shifted west has de minimis impact because there is No Adverse Effect under Section 106 is a premature conclusion because there is not enough information presented in the DSEIS to determine the effect of vibrations on the main building or Kindergarten Building, and because the Period of Significance chosen by the Project is incorrect.

Page 4-92, Description of Providence Academy:

The description is incorrect. Please revise to read as follows:

> The House of Providence (Providence Academy) is currently a commercial property owned by the non-profit The Historic Trust. Historically, the property was built and managed by the Sisters of Providence as a school, orphanage, and administrative headquarters. The main building, constructed between 1873 and 1874 and with a large addition in 1891, is an ornate, three-story Georgian Revival building with basement and attic that is built of unreinforced brick and shows the influence of the French Colonial architectural style. The ancillary Kindergarten Building, constructed 1943-44, is a one-story vernacular building (with basement) which is built of unreinforced hollow clay tile. It is now also a commercial building but remained in educational uses until 2023, with some occasional short periods of vacancy. The House of Providence and Kindergarten Building are listed in the National Register of Historic Places. Criteria A, B, and C apply to the House of Providence in recognition of the property's close association with the achievements of Mother Joseph of the Sacred Heart, who was the leader of the Sisters of Providence in the late 19th century and the architect of the House of

> Providence's primary building. The property is also significant for the entire Sisters of Providence organization, which served in the founding role in the creation of the greater Pacific Northwest's first and lasting EuroAmerican humanitarian, educational, and medical networks. Criterion A applies to the Kindergarten Building because of its associations with the Sisters serving the educational needs of the huge influx of World War II defense workers into Vancouver.

Page 4-93 Figure 4-33:

For best understanding of this map, an updated aerial photograph would be useful as the area around the Academy has changed since this view was taken.

Chapter 4.3.8, Page 4-94 – Use Evaluation for the Modified LPA:

Because the Project has incorrectly concluded that the Period of Significance ends at 1924 and thus does not include the Kindergarten Building, it also improperly excludes this building from consideration of effects. The Historic Trust, and its structural engineer, find it hard to believe that the hollow-clay-tile building from 1943-44, situated directly over and next to the underground and high vibration tie-back work the project proposes, will not be significantly impacted and possibly damaged. The DSEIS does not provide enough information to discern.

The project does not provide enough information about increases in noise during or after the project to discern whether there would be significant impact.

The Historic Trust does not agree with the Finding of No Adverse Effect. The Historic Trust is especially concerned with the effects of vibrations on the main Academy Building and the Kindergarten Building, and placing the period of significance as ending in 1924 instead of 1966, when the school closed and management by the Sisters of Providence concluded.

The Trust is extremely concerned about the vibratory effects of drilling for the tie-back anchors on the main Academy Building and the Kindergarten Building.

The Trust is happy to work with the project on a smooth use of a temporary construction easement and repair of any damage resulting therefrom. Any impacts on the Sacred Heart Garden, the oldest Euro-American designed formal landscape in the western United States, are not acceptable.

Page 4-94 Use Evaluation, paragraph 2, bullet 1:

Archaeological testing is necessary to determine whether drilling for tie-back anchor installation would affect archaeological resources.

Page 4-95, Land being used must be fully restored:
The project is already aware, and has made note, of the fact that the hedge and curb they reference have already been removed. If the Kindergarten Building is damaged, will it be restored to pre-construction condition? If vibrations damage the main Academy building, will it be properly restored?

Page 4-95, Westward shift option:

Given the Kindergarten Building's close proximity to the project's construction area, the Project Team's selection of a Period of Significance that excludes the Kindergarten Building seems intentional. Period of Significance is not intended to be used to exclude properties or parts of properties, and the Project's oversight in this matter overlooks an important part of the area's social history and the history of the site. Further, it puts the integrity of a historic building at risk.

Because the Project has incorrectly concluded that the Period of Significance ends at 1924 and thus does not include the Kindergarten Building, it also improperly excludes this building from consideration of effects. The Historic Trust, and its structural engineer, find it hard to believe that the hollow-clay-tile building from the 1940s, situated directly over and next to the underground and high vibration tie-back work the project proposes, will not be significantly impacted and possibly damaged. The DSEIS does not provide enough information to discern.

Impacts to this building and this area of the site could significantly impair the site's ability to convey its significance, especially if the entire Kindergarten Building is damaged or needs to be removed. Because there is not enough information in the DSEIS to determine if this would be the case in any configuration, it is premature to determine No Adverse Effect.

Note: On page 4-128, it is noted that ground-borne vibrations could have such a significant impact as to structurally damage NCO Family Quarters (Buildings 635 and 644) in the VNHR. These buildings are similarly situated in distance from the construction zone as the main Providence Academy Building. If vibrations could damage these buildings, why would they not damage the Academy, where even more invasive underground tie-back work will be performed?

Interstate Bridge Replacement Program
November 18, 2024

Comments on Acquisitions Technical Report

Appendix Table A-4 Takings for Options 1&2 Modified LPA and without C Street Ramps Partial Acquisition; Appendix Table A-5 Takings for Option 3 Westward Shift Partial Acquisition

Both of these tables presume that the Academy property is not included in the Section 106 cultural resources mitigation process. The Academy should have Adverse Effect declared and be mitigated accordingly. Further, there is a development agreement in place with the owner of the parcel to the north, 400 E Evergreen Blvd. Within that agreement, the Academy must maintain fire lane access to the east of the property, along the western side of the I-5 freeway right-of-way and just to the east of the Kindergarten Building. It is unclear from DSEIS documents whether the proposed partial acquisition includes the fire lane access and/or how that will be remedied and the parties kept whole.

Mitigation

Mitigation is not a substitute for the full and fair evaluation required by NEPA. However, mitigation can allow projects to proceed in compliance with NHPA and Section 4(f) after completion of a complete NEPA analysis.

The Historic Trust requests that IBR consider the following mitigation measures to avoid severe and potentially irreparable impacts on The Academy. Once a proper Section 106 Finding of Adverse Effect is made, these measures could be incorporated into the Programmatic Agreement for the project.

1. Re-evaluate site integrity as parcel is now – primary structure has always been the Academy building, which remains, as does the 1875 Sacred Heart Garden and Kindergarten Building;
2. Proactive pre-construction survey of Academy and Kindergarten to provide baseline of current status;
3. Geotechnical study to understand interaction of soils and construction vibrations;
4. Participation in and access to data from vibration monitors to determine any changes to Academy, Kindergarten Building, and parking lot;
5. Agreement that project provides complete compensation for needed repairs according to Secretary of the Interior Standards for the Treatment of Historic Properties;
6. Lessen noise increase with construction of sound wall; Trust to have major contributing role in determination of height, thickness, and appearance; coated with most effective graffiti deterrent available at time of construction – project to pay for graffiti removal for 25 years;
7. Compensate for alteration of viewshed by enhancing Community Connector (I-5 lid);

8. Provide compensation for any damage to property at southeast corner during use for construction staging to standards of City of Vancouver requirement for construction of a "heritage sidewalk" as required in the Vancouver City Center Vision Plan, or to the city standard at the time work occurs.

Conclusion

Thank you for considering these comments. Please contact me with any questions.

Very truly yours,

SCHWABE, WILLIAMSON & WYATT, P.C.



Lawson E. Fite
LEF:cw
Enclosures

ERICKSON STRUCTURAL
CONSULTING ENGINEERS, PC

October 16, 2024

SENT VIA EMAIL

temple.lentz@thehistorictrust.org
holly.chamberlain@thehistorictrust.org
marc.thompson@thehistorictrust.org

RE: Effects of Interstate Bridge Replacement Project
Upon Providence Academy and Kindergarten Building
400 E Evergreen Blvd.
Vancouver, Washington
Erickson Structural Job No. 241003

To Whom It May Concern:

I am writing to express my professional concerns regarding the potential adverse effects of the Interstate Bridge Replacement (IBR) project upon Providence Academy, a historically significant building vulnerable to vibrations and structural disturbances. As a Washington- and Oregon-licensed structural engineer with nearly 30 years of experience, including extensive work at Providence Academy, I must address the lack of detailed analysis in the Draft Supplemental Environmental Impact Statement (DSEIS), released September 2024.

Current Condition of Providence Academy and Adjacent Kindergarten Building

Providence Academy, built in the 1870s, is an unreinforced masonry (URM) structure, making it particularly susceptible to damage from construction activities and vibrations. The DSEIS acknowledges possible adverse effects but concludes there will be no impact, a determination that raises concerns due to the absence of detailed data supporting this finding. Both Providence Academy and the adjacent Kindergarten Building are currently in good physical condition and show no signs of damage consistent with or attributable to a project of the scale and nature of the bridge replacement. The Historic Trust has made significant investments to restore and maintain these important buildings, with additional investments planned, adding urgency to ensure this vital community asset is adequately protected and addressed.

Lack of Data and Analysis in the DSEIS

While the DSEIS suggests that impacts have been evaluated, it provides no clear data or analysis regarding the construction activities or vibrations that may affect the buildings during and after the IBR project. Additionally, the DSEIS lacks any explanation of the measures, if any, that will be used to monitor or mitigate these impacts. Given the buildings' age, historic status, and structural fragility, this omission must be addressed. Providence Academy and the Kindergarten Building have never been exposed to the types of external forces and influences anticipated during this project, and the lack of transparency about how these factors were considered is concerning. Based upon my experience with similar situations, vibration monitoring, as well as pre-, mid- and post-construction surveys are critical for safeguarding vulnerable structures. The lack of specificity in the DSEIS raises serious concerns that important documentation, monitoring, and mitigation measures may be overlooked, leading to potential damage and disputes.

Concerns Regarding the Westernmost Alignment

I am also concerned that the DSEIS focuses on the eastern alignment option, making a determination of no impact for that alignment, but it provides no revised determination for the westernmost alignment option. This western option

10000 NE 7TH AVE. • SUITE 130
VANCOUVER, WA • 98685

ERICKSONSTRUCTURAL.COM

would place the project much closer to Providence Academy and the Kindergarten Building, and the absence of detailed analysis for this alignment is perplexing, as it would bring significantly greater risks due to its proximity. Without directly addressing the westernmost alignment, the DSEIS's conclusion of no impact appears incomplete and lacks sufficient analysis.

Potential Impacts on the Kindergarten Building

In addition, I would like to raise concerns about the smaller Kindergarten Building to the east of Providence Academy, used as a preschool and arts education center in the recent past. Though not as old as the Academy, it was constructed using hollow clay tiles, making it highly vulnerable to vibrations, soil settlement, and similar influences. Its closer proximity to the project area means it could experience even more significant impacts, yet the DSEIS fails to address this building at all, further calling into question the thoroughness of the evaluation.

Foundation Risks and Failure to Address Key Factors

Both Providence Academy and the adjacent Kindergarten Building were constructed with basements, placing their foundation systems deeper in the soil and closer to potential sources of vibration, which could increase the likelihood of foundation settlement, movement, and damage. The DSEIS provides no consideration of this crucial factor or how it was accounted for in the analysis.

Recommendations for Action

Given the vulnerabilities of these buildings and the inherent risks presented by the IBR project, I strongly recommend the IBR project proactively protect Providence Academy and the Kindergarten Building, including taking the following actions:

- Conduct a detailed pre-construction survey of both buildings to establish baseline conditions and ensure future damage can be properly attributed.
- Conduct mid-construction surveys and implement continuous and robust vibration and structural monitoring throughout the project, with corrective measures in place if harmful levels of vibration, damage, or soil movement are detected.
- Perform a detailed post-construction survey of both buildings to assess damage resulting from the project.
- Directly acknowledge the unique risks faced by Providence Academy and the Kindergarten Building and incorporate these considerations into the bridge design and construction practices to minimize potential harm.
- Commit to addressing any damage during the IBR project promptly and in accordance with industry standards and under the supervision of licensed professionals.

Call for Transparency and Stakeholder Engagement

I also urge the IBR project team to release the specific data, engineering design, vibration studies, and alignment analysis needed for a thorough independent evaluation of the impacts on Providence Academy and the Kindergarten Building. Without this information, the determination of no impact cannot be independently verified or deemed dependable. Additionally, I recommend convening a meeting with stakeholders, including The Historic Trust,

geotechnical engineers, and structural experts, to review the IBR alignment options and impacts in greater detail, ensuring all necessary steps are taken to protect these valuable structures.

Conclusion

Taking these concerns seriously is crucial, as Providence Academy and the neighboring Kindergarten Building preserve the community's legacy. The potential adverse impacts of the IBR project must be addressed through careful planning and monitoring. These measures are not only standard practice for protecting fragile historic structures but are essential to safeguarding these buildings both during and after the project.

Thank you for your attention to these critical issues.

Sincerely,

Brandon W. Erickson, PE, SE
Principal
Erickson Structural Consulting Engineers, PC



CONTINUUM

CONTINUUM PRESERVATION CONSULTING LLC

November 11, 2024

Temple Lentz, CEO/President
The Historic Trust
750 Anderson St.
Vancouver, WA 98661

Via email

Dear Ms. Lentz:

As a preservation professional, I am writing to express my concern regarding the finding by IBR project cultural resource consultants of No Adverse Effect on Providence Academy. By way of introduction, I have been working in the field of historic preservation for 23 years, with much of my practice devoted to National Register and Section 106 work. Further, I am very familiar with the Academy site and its history, having been involved with several projects there dating back to 2012 when I worked on the due diligence report informing the Trust's decision to purchase the property, which occurred in 2015. Providence Academy has incredible significance within local and regional contexts, but is also nationally significant for its embodiment of the first Euro-American education and humanitarian networks in the Pacific Northwest.

As an experienced preparer of National Register nominations, I was surprised to learn that the conclusion of the period of significance was determined by project consultants to be 1924. While the headquarters of the Sisters of Providence moved from Vancouver to Seattle that year, the educational purposes of the property continued until 1966, when the school was closed and the final class graduated. It is most logical and consistent with current National Register best practices to have the period of significance cover the entire timeframe of the Sisters' involvement with the property and operation of the school. Additionally, there is an important history in the context of the national historic preservation movement of the grassroots effort to save the property from demolition after 1966, culminating in the 1969 purchase of the building by a local family and subsequent adaptive reuse.

It is important to keep in mind that the existing National Register nomination dates from 1978. While an excellent nomination for its time, the standards for preparation and format have changed significantly since then. What the preparer thought at the time has to be reinterpreted in contemporary terms. The Kindergarten Building, for example, was noted and briefly described in the document but was not yet 50 years of age at the time. Additionally, some of the information about it is incorrect. Considering the building today, we see that its 1943-44 date of construction puts it within a World War II context, which is extremely important for Vancouver. Though a modest building, it is one of the few, perhaps the only, remaining World War II-era building in

downtown Vancouver. Of note, there are no World War II-era military buildings remaining at the adjacent former Vancouver Barracks at the Vancouver National Historic Reserve.

I strongly support a request asking the IBR cultural resource consultants to update the period of significance to have an end date of at least 1966 and preferably 1969, and consequently, to acknowledge the historic significance of the Kindergarten Building given its World War II context. With these revisions made, the findings of effect should necessarily be Adverse Effect for this significant property.

Sincerely,

Jessica Engeman

Jessica Engeman
Historic Preservation Specialist

THE HISTORIC TRUST

November 18, 2024

Interstate Bridge Replacement Program
Attn: Draft SEIS Public Comment
500 Broadway, Suite 200
Vancouver, WA 98660

VIA Email: draftseis@interstatebridge.org

Dear Interstate Bridge Replacement Program staff,

Please find following the comments of The Historic Trust on the Interstate Bridge Replacement (IBR) Project Draft Supplemental Environmental Impact Statement in regard to Appendix C, Section 106 Documentation Forms, and Appendix D, Finding of Effect Forms to the Historic Built Environment Technical Report. Specifically, the comments are on the Section 106 Documentation Form and Section 106 Level of Effect Form for Providence Academy.

Please note that the November 18, 2024 letter from Schwabe, Williamson and Wyatt, P.C. attorney Lawson E. Fite to IBR Program regarding Comments of The Historic Trust on the Draft Supplemental Environmental Impact Statement and associated documents is incorporated with these comments.

We look forward to continuing discussions in regard to project impacts on the Providence Academy site, and mitigating them, and are happy to provide additional information and answer questions. Thank you for your review.

Best regards,

Temple Lentz, President/CEO
360-992-1805

cc: culturalresources@interstatebridge.org

CELEBRATING HISTORY. INSPIRING TOMORROW.
750 Anderson Street Vancouver, WA 98661 | 360.992.1800 | www.thehistorictrust.org

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Comments on
Interstate Bridge Replacement Program
DSEIS Historic Built Environment Technical Report Appendix C
Section 106 Documentation Form
House of Providence/Providence Academy (WA 150)
(DAHP Project No. 2020-12-07501)

11/18/2024

These comments incorporate the November 18, 1924 letter from Schwabe, Williamson and Wyatt, P.C. attorney Lawson E. Fite to IBR Program regarding Comments of The Historic Trust on the Draft Supplemental Environmental Impact Statement and associated documents (following).

Comments on **Physical Description** section:

p. 1
Historic use should also include: Domestic – institutional housing; Religion – church school

The Alterations & Dates section could be shortened to reflect the parcel as it is now to reduce confusion. The Sisters had many more buildings on the larger site over time which were removed at various times.

Thus, correct to:

1875, construction of Sacred Heart Garden;

1891, Addition of west auditorium wing; construction of 1943-44 Kindergarten Building (Gymnasium);

c. 1901 – kitchen addition
Date from typescript in collection of Providence digital archives:
Morrow, Sister Mary Claver. *Providence Academy Vancouver, Washington 1874-1950.*
p. 9
https://www.providence.org/-/media/project/psjh/providence/socal/files/about/providence-archives/providence-academy-18741950-by-sr-mary-claverweb.pdf?rev=68e6b47d87434e0ea11b408b01b9c8ac&hash=CABC021045E8EFC8612DA0A7DA2EE4E2

1956 – 62 kitchen addition – unknown to what this refers; large kitchen addition dates to c. 1901.

Line 20: Unclear as to what kitchen renovation this refers; a kitchen renovation did take place in c. 1901.

Lines 28 and 29: According to Providence Archives digital collection photograph Item Number 22.A2.43, at least a portion of the porches on the east side of the north wing were still there in 1966 when the school closed.

Lines 29, 30, and 31: Correction – The c. 1962 roof, composed of a combination of standing seam metal and composition shingles, was replaced 2017-18 by The Historic Trust. The south gallery porches were replaced in kind in 2017 as part of the same project. The northwest and northeast sections of the north porches were rehabilitated and replaced between 2020 and 2022; the ADA ramp at the inside northwest corner was installed as part of the same project.

P. 5, lines 4, 5, and 6 - edits
...However, significant interior spaces such as the chapel and ballroom (auditorium) were rehabilitated in 2019 for continued use as event spaces, with repairs undertaken with in-kind materials and faux painting applied to return the chapel altar and ballroom columns to a more original appearance.

P. 5 - edits
Original and early moved in outbuildings on the House of Providence property (including a barn, stone root cellar, and the convent building from the original St. James mission site near Fort Vancouver) were installed over time, and removed as community needs changed. Several of the early outbuildings located to the northeast of the House of Providence have been recently demolished. The c. 1945 well house which replaced the 1902 water tower over the well dug in 1902 was demolished between 2006 and 2009. The c. 1887 Laundry Building (IBR Map ID WA 150b) and 1910 boiler house/smokestack (IBR Map ID WA 150c) were demolished in 2023 (Figure 19).

Providence Archives digital collection photograph 22.A1.5 c. 1920 shows the water tower still there.
https://providencearchives.contentdm.oclc.org/digital/collection/p15352coll3/id/428/rec/355

Providence Archives digital collection photograph 22.D2.80 c. 1945 shows that the well house has replaced the water tower.
https://providencearchives.contentdm.oclc.org/digital/collection/p15352coll3/id/715/rec/459

"Around City and County." *Vancouver Weekly Columbian*. 1 May 1902. P. 3
112-feet deep well sunk at the Academy by J.J. Healy.

Blank, Carla and Tania Martin. *Storming the Old Boys' Citadel*. Montreal: Baraka Books. 2014 p. 78

1902 - Mr. Goss built the water tower.

Note: the exact date of construction of the Laundry Building has not been determined. Laundry was originally done inside the House of Providence. ("Laying the Cornerstone of the Orphan Asylum at Vancouver," *Catholic Sentinel,* September 26, 1873, p. 1). However, the Laundry Building had certainly been constructed by 1888 as the Sanborn for that year includes it.

prepare for the landscape renovation planned for 2025.

P. 7, Line 3 – The name of Aegis has been changed to Aeon.

Lines 4 and 5 – edits: Historic grounds features that remain include the original perimeter of the Sacred Heart Garden, now covered in asphalt, and its central north-south walkway and circular flower bed, and lawn. The mortared….

Lines 10 and 11 – The western portions of hedge and curb were removed by Marathon in accordance with the City of Vancouver's requirement for installation of a particular sidewalk design relating to the *Vancouver City Center Vision* report called "Heritage Sidewalk."

Comments on **Integrity** section:

P. 7, Lines 20 through 24 - Mention for context in the introduction of this section that the majority of the House of Providence's alterations were done well over 50 years ago, and in the case of just the large 1891 addition, 133 years ago. Furthermore, the alterations, which include the addition of indoor plumbing, reflect the typical changes required by the Sisters of Providence to fulfill their mission and meet sanitary standards that evolved over time, along with accomplishing needed building upkeep. Many of the alterations are on the rear of the building and are not visible from the primary facade.

Lines 23 and 24 Correct to state that the original roof was zinc. The third roof, installed in 2017-2018, was returned to metal.

Line 24 – Correct to state that the Sisters of Providence made changes to the interior necessary to house and educate students, and fulfill their mission of service to the community. All of these changes would have been made 58 or more years ago.

Line 24 – Correct to state that interior changes made to accommodate the commercial uses starting c. 1974 were relatively minor; many spaces stayed the same size.

Lines 29 and 30 - Correct to state that the 1891 west addition originally had a porch walkway on the first level.

Lines 29 and 30 - Correct to indicate that the original roof was zinc. Therefore, the current standing seam metal roof which replaced an existing roof of standing seam metal and composition shingles returns the roof to its original material.

Lines 34 and 35 - See earlier comment regarding the National Register nomination overstating the amount of formal landscaping.

Line 36 – The western and northern areas which were parking lots are not on the current parcel.

Pp. 7 and 8, Lines 36 and 37, and p. 8, Line 1 - Correct to indicate that the oval outline is the original perimeter of the Sacred Heart Garden and the north-south walkway an original path through the garden.

P. 8, Lines 5 through 7 - Correct to indicate that the landscape features of central walkway and

P. 11 Lines 3 and 4 - Addition: The Kindergarten Building, built 1943-44 to help provide education for the extremely large addition to the local population of children of World War II defense workers, housed a kindergarten classroom from 1944-1948, supporting the activities of the SOP Kindergarten Department.

Lines 10 and 11 - Addition: ...for modern uses. After an attempt to redevelop the entire site with a variety of civic uses such as the city hall, Hidden turned to rehabilitating the Academy for adaptive reuse for small businesses, both retail and office, beginning in 1974. ("Providence: A Silent Centennial." *The Columbian*. 3 September 1974, p. 2.)

Line 13 - Correction: ...complete by 1974.

Lines 14 and 15 - Correction: The Hidden family continued to rehabilitate and rent spaces from the 1970s into the 2000s, adding the event spaces for rental in 1977. (Burnett Bob. "The Academy." *The Columbian*. 28 January 1977, p. 56.)

Lines 15 through 18: The Kindergarten Building was also leased to tenants, including Montessori schools, schools for children with special needs, and arts-oriented schools from 1978 to 2024.

Line 21, and later Federal references - Correct to delete Federal. Mother Joseph was more influenced by her background growing up in Quebec and seeing the buildings in Montreal than American Federal architecture.

P. 12 First paragraph - Correct to discuss Mother Joseph's background in Montreal.

Lines 24 through 27 – The version of the site map in WISAARD does not include the word intrusion in regard to the Kindergarten Building. The version in the DOE does. It is unclear when the word intrusion was added, and by whom. In any event, the Kindergarten Building was not yet 50 years old when the 1978 nomination was written. It must be evaluated in light of how old it is at present.

Line 30 - The Trust disagrees with concluding the period of significance in 1924. The period of significance should go to 1966, the conclusion of the SOP's direct association with the property, and their educational mission.

P. 13 Paragraph 1 - The Trust disagrees with concluding the period of significance in 1924. The period of significance should go to 1966, the conclusion of the SOP's direct association with the property and the conclusion of its primary function as a school. Additionally, the Kindergarten Building embodies an important role in the World War II era which transformed Vancouver, by serving as an educational site for children of the huge influx of defense workers as well as local children. Today, it is a rare remaining World War II-era building in downtown Vancouver, as well as the adjacent Vancouver Barracks. The Kindergarten Building was not yet 50 years old when the 1978 nomination was written. It must be evaluated in light of how old it is at present.

Paragraph 2 - Unsure of the intended meaning of sentence 1 in line 17.

The discussion of Mother Joseph should include her groundbreaking role as an early woman architect.

THE HISTORIC TRUST
CELEBRATION · EDUCATION · PRESERVATION

Comments on
Interstate Bridge Replacement Program
DSEIS Historic Built Environment Technical Report Appendix D
Section 106 Level of Effect Form
House of Providence/Providence Academy (WA 150)
(DAHP Project No. 2020-12-07501)

11/18/2024

These comments incorporate the November 18, 1924 letter from Schwabe, Williamson and Wyatt, P.C. attorney Lawson E. Fite to IBR Program regarding Comments of The Historic Trust on the Draft Supplemental Environmental Impact Statement and associated documents (following).

Comments on **Introduction** section:

P. 2 Paragraph 2

The Historic Trust disagrees with the recommended finding of No Adverse Effect on Providence Academy.

Comments on **Identification and Description of Historic Property** section:
Note: more complete comments on the property description are included in the Trust's comments on the Section 106 Determination of Eligibility Form

P. 4 Line 21 Correct sentence to characterize the Academy as a commercial property.

Lines 31 through 34 Unsure to what the word "schoolhouse" is referring in this context. Correct to: Numerous outbuildings were also constructed on the grounds or moved to the grounds of the House of Providence to support the institution's operations. A barn, root cellar, convent, and wellhouse have been removed, along with other buildings. The c. 1887 Laundry Building and 1910 boiler house and polygonal smokestack that stood northeast of the primary building were demolished in 2022.

Lines 35 and 36 Correct to: ...House of Providence that remains, although it was constructed in 1943-44 and therefore dates to after the property's initial period...

Lines 36 through 39
Evidence indicates that the 1978 National Register nomination overstates the amount of formal landscaping at the House of Providence. The only parterre for which there is any evidence is the c. 1875 Sacred Heart Garden. The other gardening seems to have been of a utilitarian food production nature as the Sisters had many mouths to feed. There were also play areas for the

Building is a contributing building as it played an important role in the World War II era which transformed Vancouver, by serving as an educational site for children of the huge influx of defense workers as well as local children. Today, it is a rare remaining World War II-era building in downtown Vancouver, as well as the adjacent Vancouver Barracks. The Kindergarten Building was not yet 50 years old when the 1978 nomination was written. It must be evaluated in light of how old it is at present.

Comments on **Assessment of Effects** section:

P. 6 Paragraph 6
The Trust disagrees that the subsurface easement will not have an effect on the Academy and the Kindergarten Building. The Trust maintains that the Kindergarten is a contributing building.

P. 6, Paragraph 7 and p. 7 paragraph 1
The proposed temporary easement may adversely effect the southern boundary by damaging the Sacred Heart Garden and southern property edge. The commitment to restore any damage to pre-construction conditions must include the Sacred Heart Garden. Additionally, changes to the sidewalk will need to meet the city of Vancouver's requirement for installation of a Heritage Sidewalk.

P. 7 Paragraph 2, Lines 18 through 20
The Trust is concerned that introduction of new atmospheric and audible intrusions could diminish the organization's ability to retain office and event venue renters. Revenue from these activities help support preservation of the building and the Trust's ability to steward it now and for future generations. More dirt and noise will make it more difficult to rent offices and event venues.

P. 7 Paragraph 3
The Trust does not agree that the possible westward shift and accompanying construction vibrations will have No Adverse Effect on contributing buildings. The Trust maintains that the Kindergarten Building is a contributing building. Furthermore, the shift would bring construction vibrations closer to the Academy and the Kindergarten, both built of unreinforced masonry, and threaten their structure. If the property taking required removal of the Kindergarten Building, loss of an historic building and the income derived from rentals thereof would result. Though the southwest parking lot is not historic, loss of any portion would result in less parking rental income and less availability of parking for building tenants and their business clients, visitors, and event venue renters and their guests.

P. 8 Paragraph 1
The Trust is also concerned about any damage to the Sacred Heart Garden resulting from the proposed temporary easement along the southern boundary, and urges reevaluation of the Finding of Effect.

Schwabe

November 18, 2024

Lawson E. Fite
Admitted in Oregon, Washington and Montana
D: 503-796-3760
C: 503-568-6694
lfite@schwabe.com

VIA E-MAIL AND CERTIFIED MAIL –
RETURN RECEIPT REQUESTED

Interstate Bridge Replacement Program
Attn: Draft SEIS Public Comment
500 Broadway, Suite 200
Vancouver WA 98660
DRAFTSEIS@INTERSTATEBRIDGE.ORG

RE: Comments of The Historic Trust on Interstate Bridge Replacement Program ("IBR")
Draft Supplemental Environmental Impact Statement ("DSEIS")
Our File No.: 140050-285772

Dear IBR Program:

The Historic Trust ("THT" or the "Trust") submits these comments on the DSEIS as it relates to Providence Academy, a property owned by the Trust. These comments are supplementary to, and incorporate by reference, the Trust's comments regarding compliance with Section 106 of the National Historic Preservation Act, including the Trust's letter of August 7, 2024. Included with this letter are the opinions of two experts, Erickson Engineering and Continuum Preservation Consulting, that demonstrate errors in the finding of no adverse effect and the period of significance under the NHPA. They also demonstrate project effects that IBR has failed to disclose and analyze in the DSEIS.

As a general matter, THT looks forward to completion of a replacement I-5 bridge to enhance regional transportation of people and goods and to allow more people to experience Vancouver's historic resources. The Trust offers the following comments on the DSEIS, which are intended to minimize and/or mitigate adverse impacts on Providence Academy, such as physical, auditory, atmospheric, vibration, and visual intrusions. Additionally, THT advocates strongly for funding for construction of the community connector between downtown Vancouver and the Vancouver National Historic Reserve as a necessary step to ensure the most seamless link between two important civic sites.

Mitigation proposed to date by the Project emphasizes documentation rather than preservation, and overlooks adequate preservation and protection of the Providence Academy site. Investing in standing buildings is greatly needed and very publicly-visible and impactful. Direct physical preservation is long-term and takes into account the long-term impacts of new bridge construction.

The Historic Trust continues to appreciate the opportunity to comment on project planning documents. We are disappointed that previous efforts to correct errors on the project's records

related to the Providence Academy have not been reflected in the DSEIS. The inaccuracies in project research and documentation negatively impact this historic resource and potentially bring irreversible harm to an irreplaceable resource. We look forward to the opportunity to collaborate on productive solutions.

The NEPA process is separate and distinct from the NHPA process and imposes requirements to take a hard look at effects on cultural resources in NEPA documents.[1] An SEIS must include a "full and fair discussion of the potential effects of the project to cultural resources...."[2] "Agency officials should ensure that preparation of ... an EIS and record of decision (ROD) includes appropriate scoping, identification of historic properties, assessment of effects upon them, and consultation leading to resolution of any adverse effects."[3] Below we have highlighted areas where the DSEIS's discussion of cultural resources is inadequate or needs correction.

Comments on Executive Summary

Page S-21: Number of NHRP-eligible historic built environment resources affected in columns 2-9 should be increased to 13, as Providence Academy should be added for all.

Comments on Chapter 2 (Alternatives)

THT does not support the westward shift alternative under any scenario. The westward shift increases the likelihood of severe adverse effects on The Academy and is likely to violate section 4(f) of the DOT Act, as discussed below.

Comments on Appendix C. Conceptual Design Drawing

The Historic Trust has previously expressed concern about this drawing and the impact it shows on the Providence Academy site. Project staff indicated the plan was conceptual and that it would be updated in the DSEIS, but the drawing has not changed. At the Academy site, this drawing appears to show infrastructure impact running through the edge of the Kindergarten Building. As this is a contributing historic resource, it should be mitigated in the Programmatic Agreement. Infrastructure also appears to project a takings of the eastern edge of the new parking lot and the southern edge of the property. The Historic Trust is renovating the southern landscape in 2025, and the project must keep the Trust whole for all impacts to the parking lot, the buildings, and the landscape, including changes made in 2025. Further, when and if the project damages or replaces the sidewalk on Evergreen, it should be replaced to the City of Vancouver's standards of "Heritage Sidewalk".

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[1] *See, e.g., Oglala Sioux Tribe v. U.S. Nuclear Regul. Comm'n*, 45 F.4th 291, 301 (D.C. Cir. 2022); *Ctr. for Biological Diversity v. U.S. Bureau of Land Mgmt.*, 746 F. Supp. 2d 1055, 1096 (N.D. Cal. 2009).
[2] *Indigenous Env't Network v. United States Dep't of State*, 347 F. Supp. 3d 561, 581 (D. Mont.) (citation omitted).
[3] 36 C.F.R. § 800.8(a)(3).

Comments on DSEIS Chapter 3.8 (Cultural Resources)

General comment: All versions of bridge construction plans will have impacts on the Providence Academy (Academy) site, including both the Academy building and the Kindergarten, requiring mitigation for vibration, audible, visual and atmospheric effects. Accordingly, a finding of no adverse effect is not appropriate. As the attached letter from Erickson Engineering states, the potential negative effects on The Academy and the Kindergarten from the Modified LPA are potentially severe and irreparable.

Table 3.8-1, Column 3, Modified LPA Effects:

Providence Academy should be included as having Adverse Effect, and the number of resources affected increased to 13.

Table 3.8-5, Washington Historic Built Environment Resources, Page 3.8-21 Map ID 150, Property ID 18827 House of Providence/Providence Academy:

The project incorrectly lists ending year built as 1930. The Kindergarten Building was constructed 1943-44. We have previously submitted this correction to the project and the correct date is acknowledged in the updated Finding of Effect (FOE) form. This date is important, and part of the history that makes this secondary building a contributing resource that must be acknowledged. *See* Letter from Continuum Preservation Consulting, November 11, 2024. The Kindergarten Building is referred to as an "intrusion" in the FOE form, with the word attributed to the 1978 nomination. We have not been able to find a reference to the Kindergarten Building anywhere in the nomination calling it an intrusion. Furthermore, the 1978 date of nomination preparation means that the Kindergarten Building was not 50 years of age at the time, which was and is the threshold for National Register eligibility except in rare exceptions. Today, the Kindergarten Building is 81 years old.

Page 3.8-26 Historic Built Environment Resources:

The Providence Academy site should be included in the list of resources that will experience Adverse Effect, as the information provided in the DSEIS about the physical impact of construction and operation of the project on the main and secondary building is not sufficient to determine whether or not the buildings will be damaged.

Table 3.8-9 Direct Effects of the Modified LPA on Washington Historic Built Environment Resources, Page 3.8-39 Map ID 150, Property ID 18827 House of Providence/Providence Academy:

The Project has incorrectly determined that the secondary building, the Kindergarten, is non-contributing. The project's Finding of Effect is based on the incorrect application of Period of Significance. The Period of Significance should conclude in 1966 consistent with the final year of the official association of the Sisters of Providence with the site, and the closure of the school, and thus include both the main building and the Kindergarten Building. In point of fact, the Sisters of Providence, and the Providence health network, remain connected to the site through present-day, by leading multiple Pilgrimage Tours for network employees every year. The Kindergarten Building is within the 100-foot boundary of the construction area and subject to adverse impacts from construction. The determination of No Adverse Effect is incorrect for this resource. Further, technical information provided in the DSEIS is insufficient to determine No Adverse effect on the Providence Academy. *See* Letter from Erickson Engineering.

The project's focus on a hedge and curb represents a misdirection and focus on the wrong priorities. The project should be concerned about the concussive impacts of construction vibration on the historic built environment, and cumulative effects.

Comments on DSEIS Section 3.11 (Noise and Vibration) and Supporting Documents

General comment:

The maximum construction noise levels noted on page 3.11-33 far exceed unacceptably high noise levels. The Providence Academy serves commercial tenants in the main building and in the Kindergarten Building. Similarly, the Academy has a robust schedule of event rentals which help support preservation of the building and connect people with the history of the site. The Kindergarten Building sits within the 100-foot buffer, and the main building is just 200 feet from the 100-foot buffer. NEPA mitigation for the project should include remedy for the likely loss of rent revenue from tenants who will choose to relocate during construction due to inability to conduct business during construction, and event venue renters who will choose an alternate location.

Page 3.11-33 Construction Vibration:

The project here does not include reference that The Historic Trust has indicated concern about vibration impacts on the Kindergarten Building and the main Academy Building. The Kindergarten Building is within the 100-foot buffer zone, and is made of hollow clay tile. This brittle building material is very susceptible to precisely the type of vibration indicated in the DSEIS, and should be mitigated. The main Academy building is unreinforced masonry, sitting less than 300 feet from the construction area. The project does not address vibrations carrying underground through clay soil, nor the probable impacts on this irreplaceable historic resource.

Noise and Vibration Technical Report Page 7-40

7.9.2.1 Regulatory Requirements, second bullet: how does the property owner access this monitoring and/or ensure it is being done properly? Additionally, what is the remedy when vibrations cause damage? For both the Academy and the Kindergarten, the Historic Trust seeks a pre-construction survey, post-construction survey, and input on and access to the vibration monitoring placement and data.

Comments on DSEIS Chapter 3.23 (Cumulative Effects)
P. 3.23-3, bullet point seven:

Should read: Aeon mixed-use development (Vancouver, west of I-5).

The Aegis project was renamed Aeon. The project was not built in conjunction with Providence Academy. Aeon and the Academy have separate owners (respectively Marathon Acquisition and Development LLC and The Historic Trust) and are on separate parcels.

Comments on DSEIS Chapter 4 (Draft Section 4(f) evaluation

General Comment: If "No Adverse Effect" on Providence Academy site through the Section 106 process means the determination that there is *de minimis* impact, and thus no prudent avoidance alternatives are needed nor planning to minimize harm to the property, this is a significant oversight on the part of the project. This determination, which poses the threat of significant harm to one of the most historically significant properties in the Pacific Northwest, is based on an incorrect interpretation of the Register nomination and Period of Significance. Corrections to site history provided by The Historic Trust have not been fully incorporated into all portions of the DSEIS.

Section 4(f) of the Department of Transportation Act prohibits approval of a transportation project using "land of an historic site of national, State, or local significance" unless:

> (1) there is no prudent and feasible alternative to using that land; and
> (2) the program or project includes all possible planning to minimize harm to the park, recreation area, wildlife and waterfowl refuge, or historic site resulting from the use.[4]

These requirements may be satisfied by finding a project has de minimis impact.[5] For historic sites, de minimis impact may be established by compliance with the NHPA and an appropriate finding of no adverse effect.

[4] 49 U.S.C. § 303(c), codification of Pub. L. No. 89-670, 80 Stat. 934 § 4(f), as amended.
[5] 49 U.S.C. § 303(d)(1)(A).

Because, as described here and elsewhere, the finding of No Adverse Effect on The Academy is inadequate and unsupported, the project does not comply with section 4(f). "This language is a plain and explicit bar to the use of federal funds for construction of highways through parks [and historic sites]—only the most unusual situations are exempted."[6] The "prudent and feasible alternative" language means "the Secretary cannot approve the destruction of parkland [or historic sites] unless he finds that alternative routes present unique problems."[7] This means that physical intrusion into The Academy property must be avoided.

Chapter 4.1.4 Constructive Use:
Section (e)(3):

It is unclear from the minimal level of detail presented in the DSEIS whether or not the southeast parking lot at the Providence Academy will be impacted. For the same reason, it is not clear whether the planned fire access lane at the eastern edge that is contractually required in an agreement with the planned Aeon apartment complex to the north will be impacted, nor access to the Kindergarten Building. Without knowing those answers, it cannot be determined if a Constructive Use occurs under this item.

The Period of Significance proposed by the project is incorrect, and the Kindergarten Building is a contributing resource. Accordingly, it should be recorded as experiencing an Adverse Effect.

Section (e)(4):

It is unclear from the minimal level of detail presented in the DSEIS whether or not the vibrations from the construction and/or operation of the project will substantially impair the use of the property, both the main Academy building and the Kindergarten Building. Without knowing those answers, it cannot be determined if a Constructive Use occurs under this item. The Period of Significance proposed by the project is incorrect, and the Kindergarten Building is a contributing resource. Accordingly, it should be recorded as experiencing an Adverse Effect.

We include a letter from our structural engineer, who presents an alternative opinion to that offered by the Project, and suggests incomplete analysis by the Project.

Chapter 4.2.2, Table 4-2 Summary Information About Section 4(f) Historic Sites (p.4-24):

The summary information in the Description column for site WA 150 is incorrect. The description should read as follows:

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[6] *Citizens to Pres. Overton Park, Inc. v. Volpe*, 401 U.S. 402, 411 (1971), *abrogated in other part by Califano v. Sanders*, 430 U.S. 99 (1977).
[7] *Id.* at 413.

> The House of Providence (Providence Academy) is currently a commercial property owned by the non-profit The Historic Trust. Historically, the property was built and managed by the Sisters of Providence as a school, orphanage, and administrative headquarters. The main building, constructed between 1873 and 1874 and with a large addition in 1891, is an ornate, three-story Georgian Revival building with basement and attic that is built of unreinforced brick and shows the influence of the French Colonial architectural style. The ancillary Kindergarten Building, constructed 1943-44, is a one-story vernacular building (with basement) which is built of unreinforced hollow clay tile. It is now also a commercial building but remained in educational uses until 2023, with some occasional short periods of vacancy.

Chapter 4.3.5, Table 4-5 Summary of Section 4(f) uses:

For House of Providence/Providence Academy, preliminary determination that double-deck fixed span with one auxiliary lane, C Street ramps, and I-5 shifted west has de minimis impact because there is No Adverse Effect under Section 106 is a premature conclusion because there is not enough information presented in the DSEIS to determine the effect of vibrations on the main building or Kindergarten Building, and because the Period of Significance chosen by the Project is incorrect.

Page 4-92, Description of Providence Academy:

The description is incorrect. Please revise to read as follows:

> The House of Providence (Providence Academy) is currently a commercial property owned by the non-profit The Historic Trust. Historically, the property was built and managed by the Sisters of Providence as a school, orphanage, and administrative headquarters. The main building, constructed between 1873 and 1874 and with a large addition in 1891, is an ornate, three-story Georgian Revival building with basement and attic that is built of unreinforced brick and shows the influence of the French Colonial architectural style. The ancillary Kindergarten Building, constructed 1943-44, is a one-story vernacular building (with basement) which is built of unreinforced hollow clay tile. It is now also a commercial building but remained in educational uses until 2023, with some occasional short periods of vacancy. The House of Providence and Kindergarten Building are listed in the National Register of Historic Places. Criteria A, B, and C apply to the House of Providence in recognition of the property's close association with the achievements of Mother Joseph of the Sacred Heart, who was the leader of the Sisters of Providence in the late 19th century and the architect of the House of

> Providence's primary building. The property is also significant for the entire Sisters of Providence organization, which served in the founding role in the creation of the greater Pacific Northwest's first and lasting EuroAmerican humanitarian, educational, and medical networks. Criterion A applies to the Kindergarten Building because of its associations with the Sisters serving the educational needs of the huge influx of World War II defense workers into Vancouver.

Page 4-93 Figure 4-33:

For best understanding of this map, an updated aerial photograph would be useful as the area around the Academy has changed since this view was taken.

Chapter 4.3.8, Page 4-94 – Use Evaluation for the Modified LPA:

Because the Project has incorrectly concluded that the Period of Significance ends at 1924 and thus does not include the Kindergarten Building, it also improperly excludes this building from consideration of effects. The Historic Trust, and its structural engineer, find it hard to believe that the hollow-clay-tile building from 1943-44, situated directly over and next to the underground and high vibration tie-back work the project proposes, will not be significantly impacted and possibly damaged. The DSEIS does not provide enough information to discern.

The project does not provide enough information about increases in noise during or after the project to discern whether there would be significant impact.

The Historic Trust does not agree with the Finding of No Adverse Effect. The Historic Trust is especially concerned with the effects of vibrations on the main Academy Building and the Kindergarten Building, and placing the period of significance as ending in 1924 instead of 1966, when the school closed and management by the Sisters of Providence concluded.

The Trust is extremely concerned about the vibratory effects of drilling for the tie-back anchors on the main Academy Building and the Kindergarten Building.

The Trust is happy to work with the project on a smooth use of a temporary construction easement and repair of any damage resulting therefrom. Any impacts on the Sacred Heart Garden, the oldest Euro-American designed formal landscape in the western United States, are not acceptable.

Page 4-94 Use Evaluation, paragraph 2, bullet 1:

Archaeological testing is necessary to determine whether drilling for tie-back anchor installation would affect archaeological resources.

Page 4-95, Land being used must be fully restored:
The project is already aware, and has made note, of the fact that the hedge and curb they reference have already been removed. If the Kindergarten Building is damaged, will it be restored to pre-construction condition? If vibrations damage the main Academy building, will it be properly restored?

Page 4-95, Westward shift option:

Given the Kindergarten Building's close proximity to the project's construction area, the Project Team's selection of a Period of Significance that excludes the Kindergarten Building seems intentional. Period of Significance is not intended to be used to exclude properties or parts of properties, and the Project's oversight in this matter overlooks an important part of the area's social history and the history of the site. Further, it puts the integrity of a historic building at risk.

Because the Project has incorrectly concluded that the Period of Significance ends at 1924 and thus does not include the Kindergarten Building, it also improperly excludes this building from consideration of effects. The Historic Trust, and its structural engineer, find it hard to believe that the hollow-clay-tile building from the 1940s, situated directly over and next to the underground and high vibration tie-back work the project proposes, will not be significantly impacted and possibly damaged. The DSEIS does not provide enough information to discern.

Impacts to this building and this area of the site could significantly impair the site's ability to convey its significance, especially if the entire Kindergarten Building is damaged or needs to be removed. Because there is not enough information in the DSEIS to determine if this would be the case in any configuration, it is premature to determine No Adverse Effect.

Note: On page 4-128, it is noted that ground-borne vibrations could have such a significant impact as to structurally damage NCO Family Quarters (Buildings 635 and 644) in the VNHR. These buildings are similarly situated in distance from the construction zone as the main Providence Academy Building. If vibrations could damage these buildings, why would they not damage the Academy, where even more invasive underground tie-back work will be performed?

Interstate Bridge Replacement Program
November 18, 2024

Comments on Acquisitions Technical Report

Appendix Table A-4 Takings for Options 1&2 Modified LPA and without C Street Ramps Partial Acquisition; Appendix Table A-5 Takings for Option 3 Westward Shift Partial Acquisition

Both of these tables presume that the Academy property is not included in the Section 106 cultural resources mitigation process. The Academy should have Adverse Effect declared and be mitigated accordingly. Further, there is a development agreement in place with the owner of the parcel to the north, 400 E Evergreen Blvd. Within that agreement, the Academy must maintain fire lane access to the east of the property, along the western side of the I-5 freeway right-of-way and just to the east of the Kindergarten Building. It is unclear from DSEIS documents whether the proposed partial acquisition includes the fire lane access and/or how that will be remedied and the parties kept whole.

Mitigation

Mitigation is not a substitute for the full and fair evaluation required by NEPA. However, mitigation can allow projects to proceed in compliance with NHPA and Section 4(f) after completion of a complete NEPA analysis.

The Historic Trust requests that IBR consider the following mitigation measures to avoid severe and potentially irreparable impacts on The Academy. Once a proper Section 106 Finding of Adverse Effect is made, these measures could be incorporated into the Programmatic Agreement for the project.

1. Re-evaluate site integrity as parcel is now – primary structure has always been the Academy building, which remains, as does the 1875 Sacred Heart Garden and Kindergarten Building;
2. Proactive pre-construction survey of Academy and Kindergarten to provide baseline of current status;
3. Geotechnical study to understand interaction of soils and construction vibrations;
4. Participation in and access to data from vibration monitors to determine any changes to Academy, Kindergarten Building, and parking lot;
5. Agreement that project provides complete compensation for needed repairs according to Secretary of the Interior Standards for the Treatment of Historic Properties;
6. Lessen noise increase with construction of sound wall; Trust to have major contributing role in determination of height, thickness, and appearance; coated with most effective graffiti deterrent available at time of construction – project to pay for graffiti removal for 25 years;
7. Compensate for alteration of viewshed by enhancing Community Connector (I-5 lid);

8. Provide compensation for any damage to property at southeast corner during use for construction staging to standards of City of Vancouver requirement for construction of a "heritage sidewalk" as required in the Vancouver City Center Vision Plan, or to the city standard at the time work occurs.

Conclusion

Thank you for considering these comments. Please contact me with any questions.

Very truly yours,

SCHWABE, WILLIAMSON & WYATT, P.C.



Lawson E. Fite
LEF:cw
Enclosures

ERICKSON STRUCTURAL
CONSULTING ENGINEERS, PC

October 16, 2024

SENT VIA EMAIL

temple.lentz@thehistorictrust.org
holly.chamberlain@thehistorictrust.org
marc.thompson@thehistorictrust.org

RE: Effects of Interstate Bridge Replacement Project
Upon Providence Academy and Kindergarten Building
400 E Evergreen Blvd.
Vancouver, Washington
Erickson Structural Job No. 241003

To Whom It May Concern:

I am writing to express my professional concerns regarding the potential adverse effects of the Interstate Bridge Replacement (IBR) project upon Providence Academy, a historically significant building vulnerable to vibrations and structural disturbances. As a Washington- and Oregon-licensed structural engineer with nearly 30 years of experience, including extensive work at Providence Academy, I must address the lack of detailed analysis in the Draft Supplemental Environmental Impact Statement (DSEIS), released September 2024.

Current Condition of Providence Academy and Adjacent Kindergarten Building

Providence Academy, built in the 1870s, is an unreinforced masonry (URM) structure, making it particularly susceptible to damage from construction activities and vibrations. The DSEIS acknowledges possible adverse effects but concludes there will be no impact, a determination that raises concerns due to the absence of detailed data supporting this finding. Both Providence Academy and the adjacent Kindergarten Building are currently in good physical condition and show no signs of damage consistent with or attributable to a project of the scale and nature of the bridge replacement. The Historic Trust has made significant investments to restore and maintain these important buildings, with additional investments planned, adding urgency to ensure this vital community asset is adequately protected and addressed.

Lack of Data and Analysis in the DSEIS

While the DSEIS suggests that impacts have been evaluated, it provides no clear data or analysis regarding the construction activities or vibrations that may affect the buildings during and after the IBR project. Additionally, the DSEIS lacks any explanation of the measures, if any, that will be used to monitor or mitigate these impacts. Given the buildings' age, historic status, and structural fragility, this omission must be addressed. Providence Academy and the Kindergarten Building have never been exposed to the types of external forces and influences anticipated during this project, and the lack of transparency about how these factors were considered is concerning. Based upon my experience with similar situations, vibration monitoring, as well as pre-, mid- and post-construction surveys are critical for safeguarding vulnerable structures. The lack of specificity in the DSEIS raises serious concerns that important documentation, monitoring, and mitigation measures may be overlooked, leading to potential damage and disputes.

Concerns Regarding the Westernmost Alignment

I am also concerned that the DSEIS focuses on the eastern alignment option, making a determination of no impact for that alignment, but it provides no revised determination for the westernmost alignment option. This western option

10000 NE 7TH AVE. • SUITE 130
VANCOUVER, WA • 98685

ERICKSONSTRUCTURAL.COM

would place the project much closer to Providence Academy and the Kindergarten Building, and the absence of detailed analysis for this alignment is perplexing, as it would bring significantly greater risks due to its proximity. Without directly addressing the westernmost alignment, the DSEIS's conclusion of no impact appears incomplete and lacks sufficient analysis.

Potential Impacts on the Kindergarten Building

In addition, I would like to raise concerns about the smaller Kindergarten Building to the east of Providence Academy, used as a preschool and arts education center in the recent past. Though not as old as the Academy, it was constructed using hollow clay tiles, making it highly vulnerable to vibrations, soil settlement, and similar influences. Its closer proximity to the project area means it could experience even more significant impacts, yet the DSEIS fails to address this building at all, further calling into question the thoroughness of the evaluation.

Foundation Risks and Failure to Address Key Factors

Both Providence Academy and the adjacent Kindergarten Building were constructed with basements, placing their foundation systems deeper in the soil and closer to potential sources of vibration, which could increase the likelihood of foundation settlement, movement, and damage. The DSEIS provides no consideration of this crucial factor or how it was accounted for in the analysis.

Recommendations for Action

Given the vulnerabilities of these buildings and the inherent risks presented by the IBR project, I strongly recommend the IBR project proactively protect Providence Academy and the Kindergarten Building, including taking the following actions:

- Conduct a detailed pre-construction survey of both buildings to establish baseline conditions and ensure future damage can be properly attributed.
- Conduct mid-construction surveys and implement continuous and robust vibration and structural monitoring throughout the project, with corrective measures in place if harmful levels of vibration, damage, or soil movement are detected.
- Perform a detailed post-construction survey of both buildings to assess damage resulting from the project.
- Directly acknowledge the unique risks faced by Providence Academy and the Kindergarten Building and incorporate these considerations into the bridge design and construction practices to minimize potential harm.
- Commit to addressing any damage during the IBR project promptly and in accordance with industry standards and under the supervision of licensed professionals.

Call for Transparency and Stakeholder Engagement

I also urge the IBR project team to release the specific data, engineering design, vibration studies, and alignment analysis needed for a thorough independent evaluation of the impacts on Providence Academy and the Kindergarten Building. Without this information, the determination of no impact cannot be independently verified or deemed dependable. Additionally, I recommend convening a meeting with stakeholders, including The Historic Trust,

geotechnical engineers, and structural experts, to review the IBR alignment options and impacts in greater detail, ensuring all necessary steps are taken to protect these valuable structures.

Conclusion

Taking these concerns seriously is crucial, as Providence Academy and the neighboring Kindergarten Building preserve the community's legacy. The potential adverse impacts of the IBR project must be addressed through careful planning and monitoring. These measures are not only standard practice for protecting fragile historic structures but are essential to safeguarding these buildings both during and after the project.

Thank you for your attention to these critical issues.

Sincerely,

Brandon W. Erickson, PE, SE
Principal
Erickson Structural Consulting Engineers, PC



CONTINUUM

CONTINUUM PRESERVATION CONSULTING LLC

November 11, 2024

Temple Lentz, CEO/President
The Historic Trust
750 Anderson St.
Vancouver, WA 98661

Via email

Dear Ms. Lentz:

As a preservation professional, I am writing to express my concern regarding the finding by IBR project cultural resource consultants of No Adverse Effect on Providence Academy. By way of introduction, I have been working in the field of historic preservation for 23 years, with much of my practice devoted to National Register and Section 106 work. Further, I am very familiar with the Academy site and its history, having been involved with several projects there dating back to 2012 when I worked on the due diligence report informing the Trust's decision to purchase the property, which occurred in 2015. Providence Academy has incredible significance within local and regional contexts, but is also nationally significant for its embodiment of the first Euro-American education and humanitarian networks in the Pacific Northwest.

As an experienced preparer of National Register nominations, I was surprised to learn that the conclusion of the period of significance was determined by project consultants to be 1924. While the headquarters of the Sisters of Providence moved from Vancouver to Seattle that year, the educational purposes of the property continued until 1966, when the school was closed and the final class graduated. It is most logical and consistent with current National Register best practices to have the period of significance cover the entire timeframe of the Sisters' involvement with the property and operation of the school. Additionally, there is an important history in the context of the national historic preservation movement of the grassroots effort to save the property from demolition after 1966, culminating in the 1969 purchase of the building by a local family and subsequent adaptive reuse.

It is important to keep in mind that the existing National Register nomination dates from 1978. While an excellent nomination for its time, the standards for preparation and format have changed significantly since then. What the preparer thought at the time has to be reinterpreted in contemporary terms. The Kindergarten Building, for example, was noted and briefly described in the document but was not yet 50 years of age at the time. Additionally, some of the information about it is incorrect. Considering the building today, we see that its 1943-44 date of construction puts it within a World War II context, which is extremely important for Vancouver. Though a modest building, it is one of the few, perhaps the only, remaining World War II-era building in

downtown Vancouver. Of note, there are no World War II-era military buildings remaining at the adjacent former Vancouver Barracks at the Vancouver National Historic Reserve.

I strongly support a request asking the IBR cultural resource consultants to update the period of significance to have an end date of at least 1966 and preferably 1969, and consequently, to acknowledge the historic significance of the Kindergarten Building given its World War II context. With these revisions made, the findings of effect should necessarily be Adverse Effect for this significant property.

Sincerely,

Jessica Engeman

Jessica Engeman
Historic Preservation Specialist

IBR Draft SEIS - RECORD #3215 DETAIL

First Name :	Susan (she/her/hers)
Last Name :	Sturges
Attachments :	EPA.pdf (2 mb) 05052FHW_IBR_DSEIS_letter.pdf (244 kb)

REGION 10
SEATTLE, WA 98101

November 18, 2024

IBR Program Draft SEIS
c/o Chris Regan, IBR Program Environmental Manager
500 Broadway Street, Suite 200
Vancouver, WA 98660

Dear Chris Regan:

The U.S. Environmental Protection Agency has reviewed Federal Highway Administration and Federal Transit Administration's September 2024 Draft Supplemental Environmental Impact Statement for the Interstate Bridge Replacement Program (CEQ Number 20240163, EPA Project Number 05-052-FHW). The EPA has conducted its review pursuant to the National Environmental Policy Act and our review authority under Section 309 of the Clean Air Act. The CAA Section 309 role is unique to the EPA and requires the EPA to review and comment publicly on any proposed federal action subject to NEPA's environmental impact statement requirement.

The DSEIS evaluates the potential environmental impacts associated with the proposed Interstate Bridge Replacement Program which updates and supplements the Interstate 5 (I-5) Columbia River Crossing project originally approved in 2011 and later discontinued in 2014. The DSEIS focuses on a 5-mile corridor that includes bridge, transit, active transportation, and highway improvements to address safety and mobility in the I-5 corridor between Portland, Oregon and Vancouver, Washington. The DSEIS assesses a No Build Alternative and a Modified Locally Preferred Alternative with several design options, including: a new pair of Columbia River bridges (single-level, fixed span; double-deck fixed span, or single-level movable span); improvements to the I-5 mainline and seven interchanges, 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 and options for park and ride locations in Vancouver; one or two auxiliary lane(s) in each direction and safety shoulders on the bridge; improvements for people who walk, bike, and roll throughout the program area; and variable rate tolling for motorists using the river crossing as a demand management and financing tool.

As a Cooperating Agency, the EPA provided comments on an Administrative Draft SEIS in October 2023 and has worked with the federal and state transportation agencies to incorporate our recommendations into the NEPA analysis. The EPA appreciates that several of our administrative

comments have been addressed, including recommendations on estimating greenhouse gas emissions (GHGs) and monetizing the climate damages using the social cost of GHGs.

After reviewing the DSEIS, the EPA has identified environmental quality concerns about potential project impacts to communities with environmental justice concerns and is providing recommendations to improve the assessment and environmental outcome of the proposed action. The EPA also provides recommendations for the Final SEIS to clarify National Pollutant Discharge Elimination System permitting requirements. These FSEIS recommendations are further discussed in the enclosed Detailed Comments.

Thank you for the opportunity to review the DSEIS for this project. If you have questions about this review, please contact me at 206-553-2117 or at sturges.susan@epa.gov.

Sincerely,

SUSAN STURGES

Digitally signed by SUSAN STURGES
Date: 2024.11.18 13:42:20 -08'00'

Susan Sturges, Acting Manager
NEPA Branch

cc: Thomas Goldstein, PE, IBR Program Oversight Manager, Federal Highway Administration
Jeffery Horton, General Engineer, Federal Transit Administration

Enclosure

U.S. EPA Detailed Comments on the
Interstate Bridge Replacement Program DSEIS
Multnomah County, Oregon and Clark County, Washington
November 2024

Environmental Justice (EJ)

The EPA acknowledges that the DSEIS identifies, analyzes, and addresses disproportionate impacts to communities with EJ concerns which is consistent with Executive Order 14096 *Revitalizing Our Nation's Commitment to EJ for All*. The EPA notes that the analysis to identify communities with EJ concerns includes meaningfully greater analysis and identifies "high priority" EJ areas based on low-income and minority populations that are two times greater than the average region.[1]

The DSEIS determines that disproportionate and adverse impacts would occur even after mitigation from both long-term effects and effects during construction and states that additional EJ analysis and public engagement to refine potential impacts and gather public input on mitigation measures is necessary.[2] The Council on Environmental Quality's EJ Guidance under NEPA directs agencies to give heighten attention to alternatives, mitigation strategies, monitoring needs, and preferences expressed by the affected community.[3] The EPA recommends the FSEIS:

- Detail the additional planned outreach and include how input from impacted communities informed mitigation measures and the selection of the preferred alternative.
- As construction phasing plans are further developed, ensure that potentially affected communities are meaningfully engaged to identify and assess any additional concerns and impacts (e.g., environmental, public health, safety, etc.) and to inform mitigation measures and plans. This will help ascertain direct, indirect, and cumulative effects from any potential simultaneous or prolonged/sequential construction projects are minimized to neighboring communities and sensitive receptors.

National Pollutant Discharge Elimination System (NPDES) – Specific Comments

The EPA recommends the FSEIS and Water Quality and Hydrology Technical Report (technical report) clarify the following key NPDES terms, requirements, and/or permits that are referenced throughout the DSEIS and the technical report:

- The documents indicate that the state Departments of Transportation construction stormwater manuals will be followed.[4] The EPA recommends clarifying that the controlling regulatory authority for construction stormwater will be each state's construction stormwater general permit.

[1] DSEIS, page 3-20.4.
[2] DSEIS, page 3-20.47.
[3] CEQ EJ Guidance, page 20. https://www.epa.gov/sites/default/files/2015-02/documents/ej_guidance_nepa_ceq1297.pdf. Accessed 10/16/2024.
[4] For example, see: DSEIS, page 3.14-18, Section 3.14.6 Potential Avoidance, Minimization, and Compensatory Mitigation Measures, Temporary Effects, Regulatory Requirements, Site Erosion/Sediment Control Measures.

- The term "Temporary Erosion and Sediment Control Plan (TESCP)" is used throughout both documents.[5] Because neither state uses this term within their construction stormwater permit, the EPA suggests clarifying that this term refers to the actual stormwater general permit plans that are required. The EPA notes that the Oregon 1200-CA stormwater general permit requires an "Erosion and Sediment Control Plan." The Washington construction stormwater general permit requires a "Stormwater Pollution Prevention Plan."
- Regarding the technical report statement "WSDOT has a NPDES Construction General Stormwater Permit to cover all WSDOT construction activities…"[6] The EPA notes that this statement is not accurate. WSDOT does not have its own construction general stormwater permit with the state of Washington and would apply for and obtain coverage under Washington's Construction Stormwater General NPDES Permit. The EPA recommends correcting the statement accordingly.
- WSDOT's Municipal Separate Storm Sewer System (MS4) permit is not included in the Washington state water quality regulations list.[7] The City of Vancouver's MS4 permit may also be applicable. The EPA recommends adding WSDOT's MS4 permit to this list of water quality regulations that apply to the IBR program in the state of Washington. The EPA also suggests listing the City of Vancouver's MS4 permit here. The EPA notes that the report includes Oregon Department of Transportation (ODOT) and City of Portland's MS4 permits in the Oregon list.
- The Gresham Group MS4 permit is not included in the Oregon state water quality regulations list.[8] The EPA notes that Oregon Department of Environmental Quality's MS4 permit for Gresham Group includes the Cities of Gresham and Fairview. The EPA suggests adding ODEQ's MS4 permit for Gresham Group to this list, as the projects appear to be within those areas.

[5] For example, see: DSEIS, multiple pages, begin page 3.14-15, Section 3.14 Water Quality and Hydrology; also see DSEIS Water Quality and Hydrology Technical Report, page 2-9, Section 2.2.2.2 Oregon.

[6] DSEIS Water Quality and Hydrology Technical Report, page 2-7, Section 2.2.2.1 Washington, Washington Administrative Code (WAC). 2021 "Dept of Transportation" WAC 68; similarly, see also page 8-1, Section 8.1.1. National Pollutant Discharge Elimination System.

[7] DSEIS Water Quality and Hydrology Technical Report, page 2-7, Section 2.2.2.1 Washington.

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REGION 10
SEATTLE, WA 98101

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c/o Chris Regan, IBR Program Environmental Manager
500 Broadway Street, Suite 200
Vancouver, WA 98660

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Sincerely,

Susan Sturges, Acting Manager
NEPA Branch

cc: Thomas Goldstein, PE, IBR Program Oversight Manager, Federal Highway Administration
Jeffery Horton, General Engineer, Federal Transit Administration

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November 2024

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[1] DSEIS, page 3-20.4.
[2] DSEIS, page 3-20.47.
[3] CEQ EJ Guidance, page 20. https://www.epa.gov/sites/default/files/2015-02/documents/ej_guidance_nepa_ceq1297.pdf. Accessed 10/16/2024.
[4] For example, see: DSEIS, page 3.14-18, Section 3.14.6 Potential Avoidance, Minimization, and Compensatory Mitigation Measures, Temporary Effects, Regulatory Requirements, Site Erosion/Sediment Control Measures.

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[5] For example, see: DSEIS, multiple pages, begin page 3.14-15, Section 3.14 Water Quality and Hydrology; also see DSEIS Water Quality and Hydrology Technical Report, page 2-9, Section 2.2.2.2 Oregon.

[6] DSEIS Water Quality and Hydrology Technical Report, page 2-7, Section 2.2.2.1 Washington, Washington Administrative Code (WAC). 2021 "Dept of Transportation" WAC 68; similarly, see also page 8-1, Section 8.1.1. National Pollutant Discharge Elimination System.

[7] DSEIS Water Quality and Hydrology Technical Report, page 2-7, Section 2.2.2.1 Washington.

[8] DSEIS Water Quality and Hydrology Technical Report, page 2-9, Section 2.2.2.2 Oregon.

IBR Draft SEIS - RECORD #3216 DETAIL

First Name :	Emily
Last Name :	Siskin
Attachments :	DSEIS-3216_Siskin_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #3216 DETAIL

Submission Date : 11/18/2024
First Name : Emily
Last Name : Siskin
Business/Organization/Agency :

Submission Input :

First Name:
Emily

Last Name:
Siskin

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
I want to make sure that increased safety and allowance for lots of bicycles are taken into account.

JCA comment #: 851

IBR Draft SEIS - RECORD #3217 DETAIL

First Name :	Rick
Last Name :	Myers
Attachments :	DSEIS-3217_Myers_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #3217 DETAIL

Submission Date : 11/18/2024
First Name : Rick
Last Name : Myers
Business/Organization/Agency :

Submission Input :

Being a commercial enterprise, the tolling of I205 will bring much added cost to my billings. Already the dump fees are outside what my clients understanding. The proposed tolls have gates that funnel traffic right to my neighborhood. Already it is sometimes difficult to get in my driveway as people funnel off I5 to gain some time before they have to get back on 205. My opposition to this plan is clear. It will not do what the framers of this proposal need it to do. It will just create havoc for all.

Rick Myers

IBR Draft SEIS - RECORD #3218 DETAIL

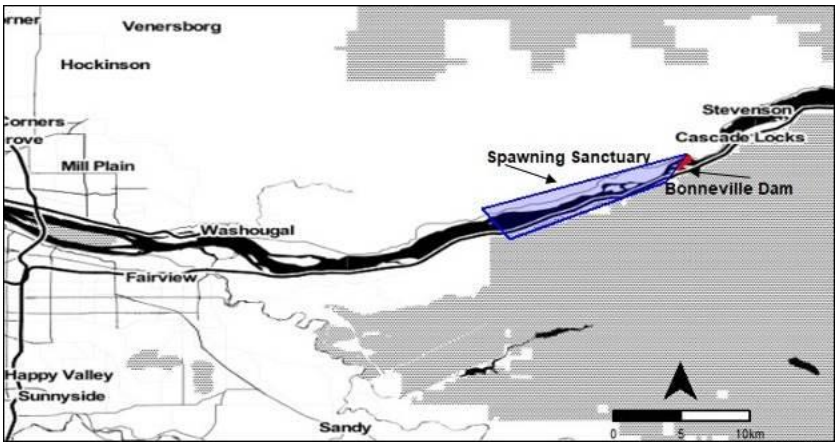
First Name :	Charlene N (DFW)
Last Name :	Hurst
Attachments :	DSEIS-3218_WDFW_Original.pdf (82 kb)

Interstate 5 Bridge Project: WDFW Fish program Comments and Recommendations

We appreciate the opportunity to provide comments on this project and its anticipated effects on fish and fisheries in the mainstem Columbia River. We have organized our comments below into two categories of impact: fish behavior/Ecological function and fisheries.

Fish Behavior/Ecological Function

- We understand that juvenile lamprey surveys have been conducted in the project site to better understand the density of lamprey. Is there a plan to monitor for densities during and after the project as well to understand how/if lamprey recolonize the area/respond to this disturbance?
- We have established a spawning ground sanctuary for sturgeon in the Lower Columbia River during the May-August spawning window. The project area doesn't appear to overlap directly, but potential effects of the work could include sediment covering egg mats, dissuasion of adults away from spawning areas due to noise/other disturbances, as well as egg reabsorption due to stress.



- Eulachon typically run from December-April with a peak in February-March (?). Any increased sediment, noise, vibration etc., could alter the migration patterns of adults heading to the Cowlitz/Lewis River to spawn
- Salmon and steelhead in the system run throughout the year and any increased sediment, noise, vibration etc., could alter the migration patterns of adults and increase stress levels. For those running in the summer months, this alternation in migration/increased stress may be more problematic due to warmer water temperatures. Likewise, anadromous lampreys are migrating through the project area much of the year. Lampreys tend to be nocturnal, so construction activities occurring at night (increased noise, vibrations, light etc.) could alter or delay migration.
- Could the temporary structures installed to do this work provide an increase in haul-out areas for pinnipeds or landing areas for birds and thus result in more predation on fish?

- **Recommendation:** Install PIT tag arrays (salmon and steelhead, lamprey, sturgeon and acoustic arrays (sturgeon) on the bridge pillars to monitor fish movement in this section of the river before, during and after the project takes place (e.g., BACI design).
- **Recommendation:** For eulachon, expand/use our plankton tow data to inform presence/absence of eulachon larvae in key sections of the project area (?).
- **Recommendation:** Conduct observations of predator movement into the area associated with the placement of temporary project structures.

Fisheries

- Commercial fishers fish in the project area for salmon using drift gillnets from August till October depending on the year, and for eulachon in the winter-spring. Any increase in debris could cause damage to nets and impact their ability to successfully catch fish.
- Changes in fish movement can alter the ability of all fishers to catch fish regardless of gear.
- **Recommendation:** Provide periodic outreach to the fishing community on project progress/milestones, particularly when large pieces of debris or may be dislodged or large volumes of sediment may be released.
- **Recommendation:** Consider if a "gear-repair fund" could be instituted to replace damaged commercial fishing gear and/or ensure all dislodged large debris is captured and removed by the project team.

IBR Draft SEIS - RECORD #3219 DETAIL

First Name :	Kelli
Last Name :	Knutson
Attachments :	DSEIS-3219_Knutson_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #3219 DETAIL

Submission Date :	11/18/2024
First Name :	Kelli
Last Name :	Knutson
Business/Organization/Agency :	

Submission Input :

I agree with this!!

Kelli Knutson

IBR Draft SEIS - RECORD #3220 DETAIL

First Name :	Heather
Last Name :	Harmon
Attachments :	DSEIS-3220_Harmon_Original.pdf (326 kb) Draft_SEIS_Public_Comment_for_IBR_K2SM.pdf (326 kb)

LeAnne M. Bremer, P.C.
Partner
LeAnne.Bremer@MillerNash.com
360.619.7002 (direct)

November 18, 2024

EMAIL: DRAFTSEIS@INTERSTATEBRIDGE.ORG

Greg Johnson
Program Administrator
Interstate Bridge Replacement Program
500 Broadway Street, Suite 200
Vancouver, WA 98660

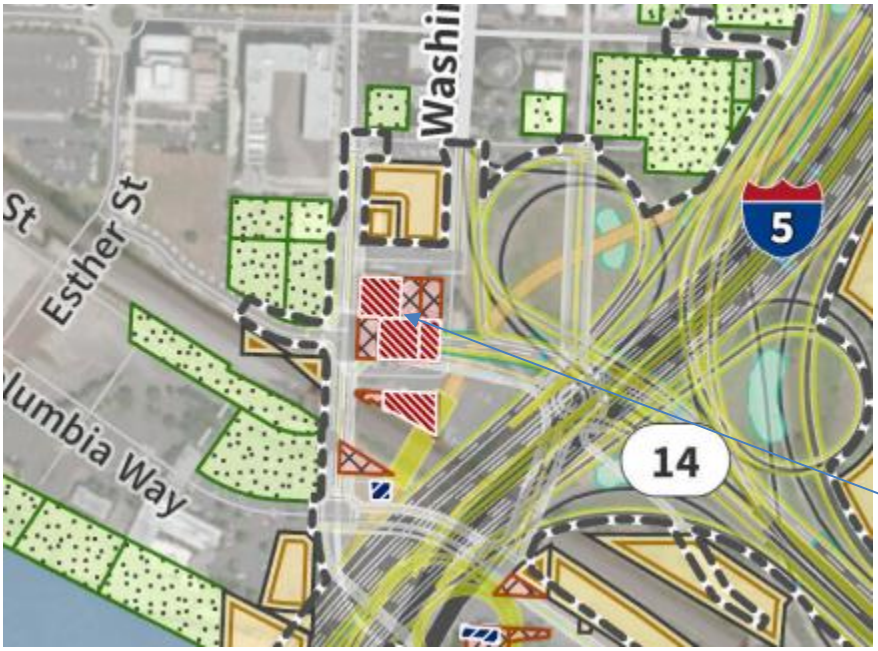
Subject: Draft SEIS Public Comment for IBR

Dear Program Administrator Johnson:

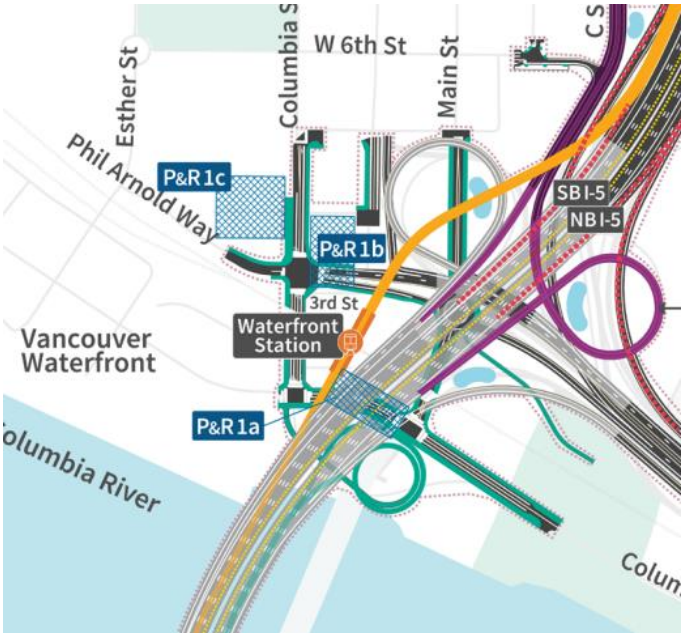
On behalf of K2SM Investments, LLC (Owner), we are providing this comment on the draft Supplemental Environmental Impact Statement for the Interstate Bridge Replacement (IBR) by the November 18, 2024 deadline.

The Owner owns a commercial building located at 210 W 3rd Street, APNs 48420-000, 48430-000, 48380-000, and 48390-000 (PEC Property). The Property is home to Pacific Energy Concepts (www.pecnw.com).

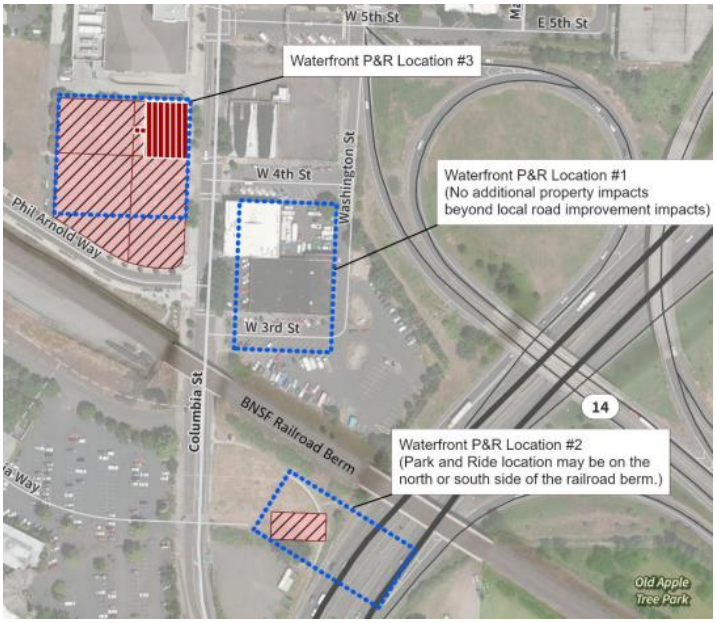
According to the DSEIS, Chapter 3, Figure 3.3-3, it denotes the PEC Property as a full acquisition and that all design options have similar impacts with one exception not relevant to the PEC Property. See also Appendix Table A4 in the Acquisitions Technical Report.



The impact to the PEC Property appears to be due to the location of re-routed SR 14 and where a roundabout is proposed at Columbia and 3rd Street:



Impacts would also be due to one option for the Waterfront Park and Ride (Option #1) as shown in the following illustration in Figure B-5 of the Technical report:



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 identify the extent of IBR's impact to the PEC Property. At a minimum, choosing Option #2 for the Waterfront Park and Ride on property owned by WSDOT should be the preferred location to avoid unnecessary adverse impacts to the PEC Property and other private property that would be caused with implementation of Option #1. If Option #1 is not selected, it is not clear if a full acquisition of the PEC Property will be necessary. The mapping and text of the DSEIS is too imprecise to determine this.

We urge the project sponsors to identify the exact impacts to the PEC Property caused by 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

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

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On behalf of K2SM Investments, 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.

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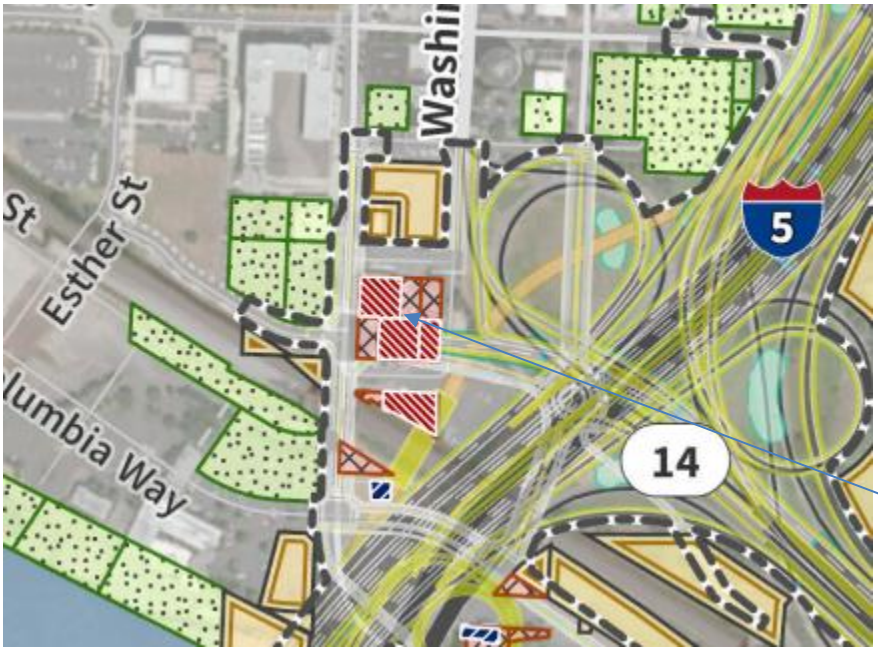

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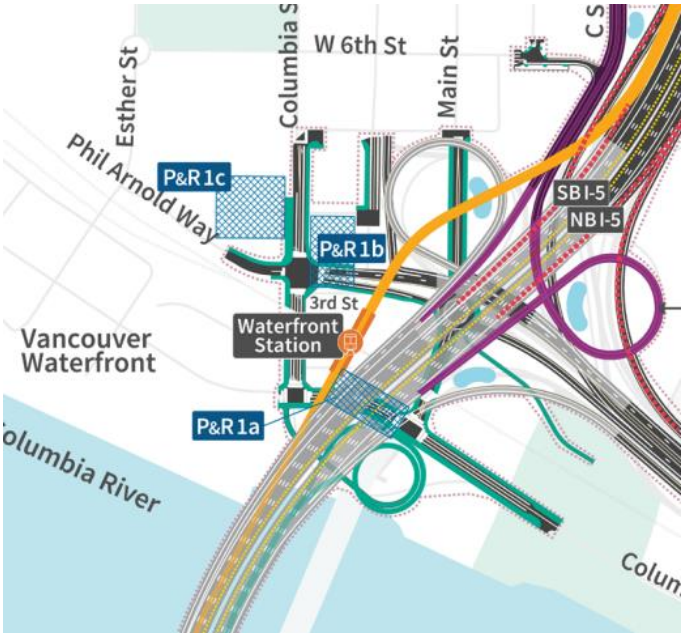

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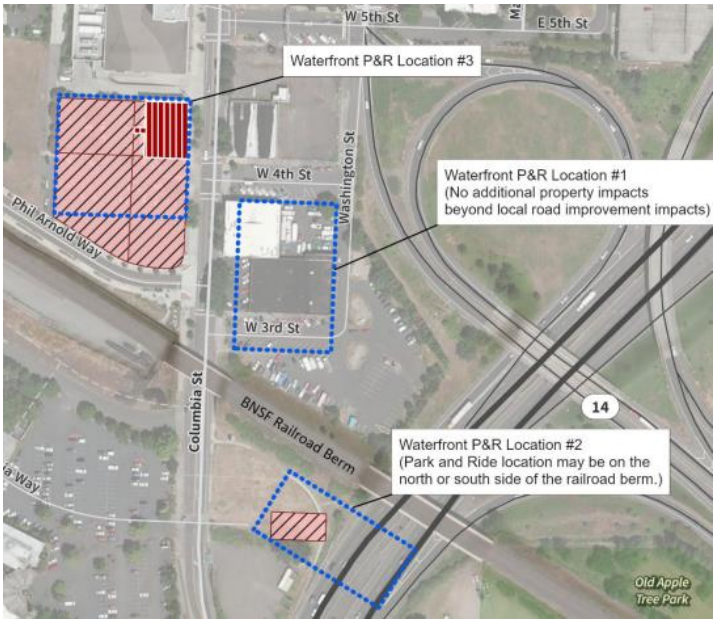

As required by NEPA, Chapter 3 of the DSEIS is designed to identify, describe, and evaluate short-term and long-term property and property rights effects, and to describe measures to help avoid, minimize, or mitigate adverse effects. The DSEIS fails to identify the extent of IBR's impact to the PEC Property. At a minimum, choosing Option #2 for the Waterfront Park and Ride on property owned by WSDOT should be the preferred location to avoid unnecessary adverse impacts to the PEC Property and other private property that would be caused with implementation of Option #1. If Option #1 is not selected, it is not clear if a full acquisition of the PEC Property will be necessary. The mapping and text of the DSEIS is too imprecise to determine this.

We urge the project sponsors to identify the exact impacts to the PEC Property caused by 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 #3221 DETAIL

First Name :	Preet
Last Name :	Gujral
Attachments :	DSEIS-3221_Gujral_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #3221 DETAIL

Submission Date : 11/18/2024
First Name : Preet
Last Name : Gujral
Business/Organization/Agency :

Submission Input :

First Name:
Preet

Last Name:
Gujral

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Parks and Recreation

Comment:
As it stands, biking and walking across the bridge is a terrifying experience. While the new models account for non-vehicle transportation, I want to differentiate beween "accomodating" and "encouraging" multi use. You can stick a path that gets you to point A and B but it might still be a terrifying experience if its obnoxiously loud and dirty from car debris, not properly protected, or not wide enough or lit up. Imagine getting a flat tire or injured on this path.

I want to imagine pullouts so someone can capture a sunrise or sunset without being in the way of bikes using the bridge for rapid transit. I want to imagine 1000 bikers or attendees of a half marathon streaming through the path as part of an organized event and having a greenspace at the entry of the bridge on both side to gather. Track the usage of this path from day 1 and design it in a way that non motorized users feel safe and valued as community members!

JCA comment #: 850

IBR Draft SEIS - RECORD #3222 DETAIL

First Name :	Victoria
Last Name :	Liu
Attachments :	DSEIS-3222_Liu_Original.pdf (6 kb)

IBR Draft SEIS - RECORD #3222 DETAIL

Submission Date : 11/18/2024
First Name : Victoria
Last Name : Liu
Business/Organization/Agency :

Submission Input :

First Name:
Victoria

Last Name:
Liu

Email:
[redacted]

US States:
[redacted]

Topic Area:
Transportation

Comment:
I believe it is necessary at this point to replace the bridge, but I do think its unnecessary to expand the width and number of lanes that the new bridge will have. I say this because the freeway that transitions onto and off the bridge will still only have four lanes after the completion of the new bridge. Expanding the width of the bridge will lead to more traffic on the bridge and consequently on the freeway, which will lead to more traffic jams on the freeway.

JCA comment #: 848

IBR Draft SEIS - RECORD #3223 DETAIL

First Name :	Kristen
Last Name :	Sartor
Attachments :	DSEIS-3223_Sartor_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #3223 DETAIL

Submission Date : 11/18/2024
First Name : Kristen
Last Name : Sartor
Business/Organization/Agency :

Submission Input :

First Name:
Kristen

Last Name:
Sartor

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
Hello,

I am writing because I am concerned about the impact that expanding freeways and adding lanes to highways (and bridges) has on our environment. We must take care of our environment in order to have a livable planet for the next generation to inhabit. I understand that the bridge needs to be replaced and I appreciate that it is

being replaced. However, replacing the bridge should not equate to increasing lanes and ability for more cars/trucks/etc to pollute our planet.
I travel between Portland and Vancouver, and I do not have an automobile due to the impacts that automobiles have on our Earth. I bike between Portland and Vancouver. I think more people would bike if there was more space between the cars and the multi-use path on the bridge. The path is so narrow, and the dividers between the cars and the path are very short. It is honestly very loud and scary! Ideally, the path would be wider and more protected- and there would be a lane for transit- a train and/or busses in a transit lane. That way, bikers could be more safe and non-bikers who want to travel between cities but can't afford or don't want automobiles could travel by transit. Transit and the multi use path right next to each other would be ideal so people could go back and forth between transit and biking. I'd love to have the option to take transit part of the way! It would be important for transit elevators to be there as well so everyone can have access.
If tolling is done for drivers, low income people should be given a discount or exemption from tolling.

Thank you!
Kristen Sartor

JCA comment #: 847

IBR Draft SEIS - RECORD #3224 DETAIL

First Name :	Nathan
Last Name :	Backous
Attachments :	DSEIS-3224_Backous_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #3224 DETAIL

Submission Date : 11/18/2024
First Name : Nathan
Last Name : Backous
Business/Organization/Agency :

Submission Input :

First Name:
Nathan

Last Name:
Backous

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Topic Area:
[redacted]

Comment:
If this bridge is to be built, there are both rational and irrational choices that could be made.

Please make the rational choice of placing the multi-use path adjacent to light-rail/bus lanes. The elevators that will be needed for transit must be able to accommodate people and their bikes, including large/heavy eBikes/cargo-bikes.

Please make the rational choice of placing the multi-use path as far away from motor-traffic as much as possible by placing the transit lanes between the multi-use path and motor traffic lanes.
Please make the rational choice of extending paths and adding connections to all current and future points-of-interest including a connection to Evergreen in Vancouver and the Vancouver/Williams couplet in Portland. A ten story spiral climb/decent as the only option in Vancouver is not rational.

Please make the rational choice of planning for expanded rail capacity/rail systems. It would be irrational to limit

the functionality of the bridge based on current transit capacity/systems.

Please do not make the irrational choice to use massively inaccurate projections about future traffic volume. The region simply will not see the population/traffic growth that could possibly explain the traffic volumes stated.

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 #: 846

IBR Draft SEIS - RECORD #3225 DETAIL

First Name :	Kelly
Last Name :	Mackin
Attachments :	DSEIS-3225_Mackin_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #3225 DETAIL

Submission Date : 11/18/2024
First Name : Kelly
Last Name : Mackin
Business/Organization/Agency :

Submission Input :

Gotta say it, the planning process for this bridge is a disappointment. Id suggest turning ownership back over to the feds and let them do their job. They are responsible for interstate commerce. Let them print some money and build a bridge or tunnel.

In any case, i am opposed to any funding project until both trans departments are reviewed and reformed. We need a rational funding model, not another patch to add to the patchwork.
Kelly Mackin

IBR Draft SEIS - RECORD #3226 DETAIL

First Name :	Brandon
Last Name :	T
Attachments :	DSEIS-3226_T_Original.pdf (6 kb)

IBR Draft SEIS - RECORD #3226 DETAIL

Submission Date : 11/18/2024
First Name : Brandon
Last Name : T
Business/Organization/Agency :

Submission Input :

To the committee:

As citizen and tax payer we collectively officially comment that we are opposed to tolls. Furthermore, Common sense needs to prevail. The public demands a seat at the table to be involved in re-focusing reigning in this project. It's our bridge, our cash, and our table!

Respectfully,
[redacted] Brandon, and others like me

IBR Draft SEIS - RECORD #3227 DETAIL

First Name :	John
Last Name :	Giacoppe
Attachments :	DSEIS-3227_Giacoppe_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #3227 DETAIL

Submission Date : 11/18/2024
First Name : John
Last Name : Giacoppe
Business/Organization/Agency :

Submission Input :

First Name:
John

Last Name:
Giacoppe

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
The transit stations being built alongside the bridge replacement project need to be made large enough for future demand. Metro and other local authorities are planning to begin running 4-car trains in Portland once the underground MAX tunnels downtown are complete; these plans have been available for some time. We should build our stations to meet the demands of these four car trains, rather than undertaking expensive renovation efforts in the near future.

JCA comment #: 845

IBR Draft SEIS - RECORD #3228 DETAIL

First Name :	Anthony
Last Name :	Warren
Attachments :	DSEIS-3228_Warren_Original.pdf (13 kb)

IBR Draft SEIS - RECORD #3228 DETAIL

Submission Date : 11/18/2024
First Name : Anthony
Last Name : Warren
Business/Organization/Agency :

Submission Input :

I agree with Vote Before Tolls - we need common sense to prevail on plans for new bridges, roads. The cost is too high and there are many other ways to accomplish increased transportation capacity, like with buses for example.

---------- Forwarded message ---------
From: Vote Before Tolls <info@votebeforetolls.org>
Date: Mon, Nov 18, 2024 at 3:38?PM
Subject: Interstate Bridge – $4.5B in Tolls & Rising
To: Anthony Warren <[redacted]>

Just a few more hours to comment ...
View this in your browser.
<https://votebeforetolls.org?mailpoet_router&endpoint=track&action=click&data=WyIxMDg2IiwieHg0OW9kb2YxdHdrZzQ4c3NzNDRzb3Nvb2cwb284b28iLCI3MSIsImNjYzRlMjRiNWVlZiIsZmFsc2Vd>

[image: Vote Before Tolls logo - Required by IP-31]
<https://votebeforetolls.org?mailpoet_router&endpoint=track&action=click&data=WyIxMDg2IiwieHg0OW9kb2YxdHdrZzQ4c3NzNDRzb3Nvb2cwb284b28iLCI3MSIsImQ3NWQ2NDFjYWM5MSIsZmFsc2Vd>
*Greetings Anthony, *
A Quick Update
Vote Before Tolls Committee has intentionally been quiet these past few months as the November election drowned out our messaging. But that is the past and now it's time to ramp up our voice, presence, and impact.

First, let's be clear ... *tolling is still coming* to Portland and Oregon roads and highways. Gov. Kotek paused, but did not stop tolling. *Tolling is a major multi-billion dollar topic at this winter's Oregon Legislative session.*

Second, IP-31 needs your support to get on the '26 ballot. We did not have enough signature momentum to make this year's ballot, but we have just over 18 months to get on the '26 ballot. *IP-31's Right to Vote assures we have a seat at the table* to bring the public's perspective and common sense to all tolling planning & projects. *Everyone who signed before August 2024 needs to sign again.*

$9B I-5 Bridge Includes $4.5B in Tolls... No Future Proofing in the Plan *SEIS Comment Period Closes at Midnight *
Informed by this article <https://votebeforetolls.org?mailpoet_router&endpoint=track&action=click&data=WyIxMDg2IiwieHg0OW9kb2YxdHdrZzQ4c3NzNDRzb3Nvb2cwb284b28iLCI3MSIsIjk2ZThkMTllNzM5NyIsZmFsc2Vd> by Lars Larson...

- ODOT, WADOT, and Governor Kotek are moving forward with plans for a new, but no bigger, Interstate Bridge over the Columbia river.
- Just 11 months ago the IBR project director Greg Johnson told us the bridge would cost $6B. *Today's estimate is $9B and rising.* While we admit construction costs are up - they are not up 50% in just ONE year!
    - Less than HALF that cost is already lined up. Oregon, Washington, and the Federal government have already chipped in.
    - The answer ... tolls on the backs and from the wallets of those who cross the bridge. The toll share was $1.5B last year, now *tolling's share is up 300% to $4.5B* currently and tolls will continue to be the "subtract answer" plugging the funding gap as project costs continue to rise.
- Tolls are currently estimated to peak at MORE than *$9 dollars a day or more than $2,000 a year f*or a daily commuter with a few more inches of lane width but no more no more vehicle capacity.
    - These *tolls will not sunset (stop)* when construction costs are paid off – they will go on forever.
- The replacement bridge is planned to have 3 lanes north and south, the same as it did when the second span was opened 58 years ago in 1958. *Does any politician think traffic will decline or the PNW region will not grow over the next 58 years?* Adding one more lane each direction now is an incremental cost and will somewhat future proof the bridge.
- *Light rail, at 1 billion a mile*, is the most expensive light rail project on earth! Our leaders want us to pay $2B for this expansion and then to subsidize the fares of the travelers! The general public in SW Washington and those of us in Oregon don't want this expansion ... and we can't afford it.
    - TriMet already owns the Expo Center - I am sure we can triple the parking lot size there and add C-Tran busses to accommodate the few hundred riders who would use the Vancouver Max extension for less than a $1M per year ... 1/200 of the cost of extended light rail!
- *Bridge tolls are planned start before the bridge construction.* And it's not clear that the Glenn Jackson I-205 bridge will be tolled. Guess where the I-5 bridge traffic will go once tolls start?

- *ODOT still has plans to toll I-5, I-205, Hwy 26, and Hwy 217* for “congestion relief”. More tolls will surely follow.

So Are We Opposed to an Earthquake Resistant and Traffic-Efficient New Bridge?

No, we absolutely agree that replacement bridge is necessary and we know we need to pay for it. But we don't want the current politician's boondoggle that costs more than we can afford. Common sense needs to prevail. The public demands a seat at the table to be involved in re-focusing reigning in this project. It's our bridge, our cash, and our table!

Since Vote Before Tolls Committee was founded in 2020 we have never been asked by planners to share and discuss our thoughts to help optimize any tolling project. We've attended dozens of "public meetings' where ODOT and state leaders listened and NEVER responded or asked us to engage on behalf of the public we represent. But to give them credit, the do count and take credit for our attendance as a "public contact".

IP-31 Covers ALL Oregon Roads, Bridges and Highways

The initiative give citizens the right to vote on all new tolls ... forcing accountability by ODOT, PBOT, Ti-MET, and our state legislators.

IP-31 is retroactive to 2018 and even covers bicyclists who seem to think they will never have to start paying for their infrastructure.

Oregon legislatative leadership shut down all discussions about tolling during last year's session and are on a path to do the same in 2025. IP-31 will call them to accountability for their many multi-billion dollar tolling spending sprees.

IBR ODOT SEIS Comment Period Closes at Midnight Tonight
ODOT Director Chris Strickler is asking the public to comment on the Supplemental Environmental Impact Statement to improve the IBR plan. The deadline is midnight tonight. We know it's short notice so we suggest you grab a thought or two from the list above. Or simply forward this email with a prefix saying you agree with it as follows:

Send your comments today by midnight ...
Email to: DraftSEIS@interstatebridge.org
<https://votebeforetolls.org?mailpoet_router&endpoint=track&action=click&data=WyIxMDg2IiwieHg0OW9kb2YxdHdrZzQ4c3NzNDRzb3Nvb2cwb284b28iLCI3MSIsImI3ZDQzYTcwOTM3YiIsZmFsc2Vd>
with "Draft SEIS public comment" in the subject line

or post your comments to https://InterstateBridge.org/DraftSEIS
<https://votebeforetolls.org?mailpoet_router&endpoint=track&action=click&data=WyIxMDg2IiwieHg0OW9kb2YxdHdrZzQ4c3NzNDRzb3Nvb2cwb284b28iLCI3MSIsIjAxMmUwZTVmYjYyZSIsZmFsc2Vd>

Let's get Signing!
*We are actively gathering signatures for IP-31, for the 2026 ballot.
Request your petitions here: https://votebeforetolls.org/initiative/
<https://votebeforetolls.org?mailpoet_router&endpoint=track&action=click&data=WyIxMDg2IiwieHg0OW9kb2YxdHdrZzQ4c3NzNDRzb3Nvb2cwb284b28iLCI3MSIsImEwNDdkNjBmOTQ0NiIsZmFsc2Vd>*
*Your Donation Is Critical to a Successful 2026 Effort! *
– Vote Before Tolls Committee is an Oregon PAC. The Political Tax Credit is a "free" contribution. Anyone can donate, and Oregon donors will get *ALL** of your $100 contribution back as a tax credit on your 2024 Oregon taxes when you file next year *(* $100 if married filing jointly, $50 if filing otherwise).*
– Vote Before Tolls Foundation is an IRS approved 501c3 charity. You can take a traditional charitable deduction for donations to the Foundation. Donors can be from any state.

Vote Before Tolls PAC - Oregon donors eligible for $100 tax credit
<https://votebeforetolls.org?mailpoet_router&endpoint=track&action=click&data=WyIxMDg2IiwieHg0OW9kb2YxdHdrZzQ4c3NzNDRzb3Nvb2cwb284b28iLCI3MSIsIjhmMTAwOTYwODJjNSIsZmFsc2Vd>
Vote Before Tolls Foundation – Everyone can take a charitable contribution
<https://votebeforetolls.org?mailpoet_router&endpoint=track&action=click&data=WyIxMDg2IiwieHg0OW9kb2YxdHdrZzQ4c3NzNDRzb3Nvb2cwb284b28iLCI3MSIsImRjOTEwNjA1NDcxMCIsZmFsc2Vd>
[image: facebook]
<https://votebeforetolls.org?mailpoet_router&endpoint=track&action=click&data=WyIxMDg2IiwieHg0OW9kb2YxdHdrZzQ4c3NzNDRzb3Nvb2cwb284b28iLCI3MSIsIjczYmY3OTcxMTA4OSIsZmFsc2Vd>
[image: twitter]
<https://votebeforetolls.org?mailpoet_router&endpoint=track&action=click&data=WyIxMDg2IiwieHg0OW9kb2YxdHdrZzQ4c3NzNDRzb3Nvb2cwb284b28iLCI3MSIsIjc1YzEwOTQ0YzNjYiIsZmFsc2Vd>
[image: instagram]
<https://votebeforetolls.org?mailpoet_router&endpoint=track&action=click&data=WyIxMDg2IiwieHg0OW9kb2YxdHdrZzQ4c3NzNDRzb3Nvb2cwb284b28iLCI3MSIsIjM1YjhjMzkyMjAwZiIsZmFsc2Vd>

View this in your browser.
<https://votebeforetolls.org?mailpoet_router&endpoint=track&action=click&data=WyIxMDg2IiwieHg0OW9kb2YxdHdrZzQ4c3NzNDRzb3Nvb2cwb284b28iLCI3MSIsImNjYzRlMjRiNWVlZiIsZmFsc2Vd>
Unsubscribe
<https://votebeforetolls.org?mailpoet_router&endpoint=track&action=click&data=WyIxMDg2IiwieHg0OW9kb2YxdHdrZzQ4c3NzNDRzb3Nvb2cwb284b28iLCI3MSIsIjE2MzE2YmFjYWQ5YSIsZmFsc2Vd>
| Manage your subscription
<https://votebeforetolls.org?mailpoet_router&endpoint=track&action=click&data=WyIxMDg2IiwieHg0OW9kb2Y

xdHdrZzQ4c3NzNDRzb3Nvb2cwb284b28iLCI3MSIsImUzYjMyMmZmMWI4NyIsZmFsc2Vd>

IBR Draft SEIS - RECORD #3229 DETAIL

First Name :	John
Last Name :	Giacoppe
Attachments :	DSEIS-3229_Giacoppe_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #3229 DETAIL

Submission Date : 11/18/2024
First Name : John
Last Name : Giacoppe
Business/Organization/Agency :

Submission Input :

First Name:
John

Last Name:
Giacoppe

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
It is absolutely crucial that the multi-use path be positioned adjacent to the transit way. The transit way will act as a buffer between pedestrians and car traffic, and the regular, passing trains will combat feelings of isolation in multi-use path users - the crossing is fairly long on foot. Additionally, the utility of the multi-use path decreases to users when they have to talk a long, circuitous route to reach their transit stop.

JCA comment #: 843

IBR Draft SEIS - RECORD #3230 DETAIL

First Name :	Scott
Last Name :	Shurtleff
Attachments :	DSEIS-3230_Shurtleff_Original.pdf (6 kb)

IBR Draft SEIS - RECORD #3230 DETAIL

Submission Date : 11/18/2024
First Name : Scott
Last Name : Shurtleff
Business/Organization/Agency :

Submission Input :

Committee Members,

I am writing to provide my comments on the revised I5 bridge replacement project. I am concerned about the emphasis of this project towards personal vehicles and trucks, which is the wrong direction for our transportation system in this time of climate emergency.

It is well known that additional lanes vehicles will not reduce congestion over the long run due to the phenomenon of induced demand (https://www.wired.com/2014/06/wuwt-traffic-induced-demand/). Traffic congestion will persist with the new bridge because of other bottlenecks, such as the I-5/I-405 split. This is revealed in your findings that travel time for the morning express bus is likely to *increase by 20% with the new bridge*. Commuters are likely to experience the same issues.

The bridge project as presently proposed fails to achieve reduced traffic congestion at a very high public cost both financially and in local disruption. Further, induced demand resulting from the new bridge will increase vehicle miles traveled which will accelerate climate change.

Please reduce the scope of this project to one focused on bridge replacement for seismic resilience, with any expansion exclusively for transit and active transportation.

Scott Shurtleff
[redacted] along the I-5 Corridor

IBR Draft SEIS - RECORD #3231 DETAIL

First Name :	Thomas
Last Name :	Love
Attachments :	DSEIS-3231_Love_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #3231 DETAIL

Submission Date : 11/18/2024

First Name : Thomas

Last Name : Love

Business/Organization/Agency :

Submission Input :

Replacing a 3 lane in each direction with the very same except it will have mass TRANSIT and bike lanes is BS.

It will do nothing to alleviate the traffic congestion.

The voters of Washington voted twice against this project for good reason,it's all about getting the train across the river and the crime that will follow.

That's the reason it was voted down twice.

A third bridge needs built first then come back to this one, my personal opinion is your all a bunch of scumbags because you refuse to listen to the citizens because you just don't care what they have to say.

Your goals are Tolls, Light Rail, and Bike Lanes, lanes for car travel is secondary, your trying to force people out of their cars for your own reasons, not the publics.

IBR Draft SEIS - RECORD #3232 DETAIL

First Name :	SANDY
Last Name :	POLISHUK
Attachments :	DSEIS-3232_POLISHUK_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #3232 DETAIL

Submission Date : 11/18/2024
First Name : SANDY
Last Name : POLISHUK
Business/Organization/Agency :

Submission Input :

You made it way too hard to get to this form! It makes me feel you don't really want comments.
I support seismic upgrades to the bridge because we can't afford to lose the connection across the river but a hug wide bridge will not fix the congestion problem. It has been proven that more and wider roads just encourage more vehicles, more traffic.
I also strongly support a MAX line on the bridge to allow commuters to leave their cars behind. A train would be so much faster than cars which end up slower during busy hours. That would take pressure off the road and motivate use of the train.

IBR Draft SEIS - RECORD #3233 DETAIL

First Name :	John
Last Name :	Ley
Attachments :	DSEIS-3233_Ley_Original.pdf (2 kb)

IBR Draft SEIS - RECORD #3233 DETAIL

Submission Date : 11/18/2024
First Name : John
Last Name : Ley
Business/Organization/Agency :

Submission Input :

The IBR team has never tried to build a bridge taller than the previous CRC height for maritime traffic of 116 feet. They have essentially done a PR dance, pretending to "listen" and "consider" the US Coast Guard request for "at least" 178 feet, and preference for "unlimited" clearance. (The unlimited could be satisfied with either a bascule bridge or an Immersed Tube Tunnel).

Instead, they have always planned to spend taxpayer money, paying "mitigation" to four up river firms. In the failed Columbia River Crossing effort, the 3 firms (at the time) were offered $86.4 million (I believe) in "mitigation". The mitigation payments come from taxpayers pockets and benefit firms, paying them to "stop complaining" and agree to be held hostage by the project.

This time, all FOUR firms have been forced to sign non-disclosure agreements. This keeps the amount being negotiated SECRET from taxpayers, who will foot the bill. It is likely any agreed upon "mitigation" payments will exceed $200 million, given inflation. Yet the taxpayers cannot make input on the waste of their money for this purpose, when no dollar amounts being offered, are known by the people footing the bill.

Saving the mitigation money and actually building an Immersed Tube Tunnel or bascule bridge could be done cheaper than the current proposal. Both should be considered as ADDITIONS of vehicle capacity to the I-5 corridor, instead of paying a couple hundred million to remove the two current bridges, saving another $200 million.

Keeping and repurposing the current two bridges would allow them to serve as a "local" connection to/from Hayden Island. It would eliminate the $1 billion to $1.5 billion "bowl of spaghetti" road maze at Marine Drive, including multiple bridges connecting Hayden Island to north Portland.

The people NEED added vehicle capacity, to save time and reduce traffic congestion. Repurposing the existing two bridges as a "collector distributor" for local traffic would serve active transportation, much better than the current LPA.

Finally, NO TOLLS are needed if the outrageous cost is lowered. Eliminating light rail saves $2 billion. Buses will more than adequately serve transit customers for the next 30-50 years. With the elimination of $2 billion for light rail, another $200 million in possible mitigation, plus another $200 million to tear down and remove current bridges, and $1 billion or more for the Marine Dr. maze of roads and bridges, will allow the project to be done much more affordably and eliminate the need for tolling.

IBR Draft SEIS - RECORD #3234 DETAIL

First Name :	Debby
Last Name :	Watts
Attachments :	DSEIS-3234_Watts_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #3234 DETAIL

Submission Date :	11/18/2024
First Name :	Debby
Last Name :	Watts
Business/Organization/Agency :	Self

Submission Input :

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.

IBR Draft SEIS - RECORD #3235 DETAIL

First Name :	John
Last Name :	Giacoppe
Attachments :	DSEIS-3235_Giacoppe_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #3235 DETAIL

Submission Date : 11/18/2024
First Name : John
Last Name : Giacoppe
Business/Organization/Agency :

Submission Input :

First Name:
John

Last Name:
Giacoppe

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Induced Demand

Comment:
The traffic modeling performed by Kate, the regional trip modeler used by Metro Regional Government, is wildly inaccurate. It fails to account for bottlenecks in the immediate vicinity of the project area, and estimates future trip numbers exceeding the maximum capacity of the existing span. Kate's problems have been recognized and acknowledged by Metro, but they have not moved on to a better model or undertaken meaningful re-calibration. New, thorough studies with a higher-quality model are necessary to give us accurate numbers of expected trips

in the future.

JCA comment #: 841

IBR Draft SEIS - RECORD #3236 DETAIL

First Name :	Margaret
Last Name :	Tweet
Attachments :	DSEIS-3236_Tweet_Original.pdf (6 kb)

IBR Draft SEIS - RECORD #3236 DETAIL

Submission Date : 11/18/2024
First Name : Margaret
Last Name : Tweet
Business/Organization/Agency :

Submission Input :

I agree with Congressional Rep. Marie Perez that the comment period should be extended. It should be for extended for all, rural and urban.
Many urban residents will be impacted by the increased taxation that is not really discussed in the SEIS. The tolls are huge too.

Gluesenkamp Perez Submits I-5 Bridge Public Comment, Urges IBR Program to Extend Comment Period to Bring More Voices to the Table

Also didn't see IBR post on Nextdoor.com about the DSEIS public comment period. ODOT, WADOT, and CTRAN have posts on this site, and I didn't see posts about comment period from them either. Since this site covers traffic a lot, and these involved agencies do post on it, it seems like should have been included more in notification about IBR public comment period. Saw IBR posts in some news at the beginning of the comment period, not many at the end of the period.

Margaret Tweet, [redacted]
.

IBR Draft SEIS - RECORD #3237 DETAIL

First Name :	Nancy
Last Name :	Crumpacker
Attachments :	DSEIS-3237_Crumpacker_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #3237 DETAIL

Submission Date : 11/18/2024
First Name : Nancy
Last Name : Crumpacker
Business/Organization/Agency :

Submission Input :

First Name:
Nancy

Last Name:
Crumpacker

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
The replacement bridge must be seismsically safe to account for a likely earthquake. It should include an extension for light rail. There should be bike and pedestrian improvements to allow access to all types of traffic. Thank you for your attention.
Nancy Crumpacker

JCA comment #: 840

IBR Draft SEIS - RECORD #3238 DETAIL

First Name :	Joan
Last Name :	Petit
Attachments :	DSEIS-3238_Petit_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #3238 DETAIL

Submission Date : 11/18/2024
First Name : Joan
Last Name : Petit
Business/Organization/Agency :

Submission Input :

First Name:
Joan

Last Name:
Petit

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
We need a new bridge to be future proof, especially for transit and for folks using active transportation methods like bicycling and walking. We need this bridge to be comfortable and accessible, with shade, barriers, and convenient connections, for people who are walking, biking, and using public transportation. We can't afford to continue subsidizing driving above these other methods of transportation. I support the positions outlined by No More Freeways and the Just Cross Alliance, focusing especially on better partnering of active transportation and transit.

JCA comment #: 839

IBR Draft SEIS - RECORD #3239 DETAIL

First Name :	ESNA
Last Name :	President
Attachments :	DSEIS-3239_President_Original.pdf (421 kb) DSEIS.pdf (209 kb)

IBR Draft SEIS - RECORD #3239 DETAIL

Submission Date :	11/18/2024
First Name :	ESNA
Last Name :	President
Business/Organization/Agency :	
Attachments :	DSEIS-3239_President_Original.pdf (209 kb) DSEIS.pdf (209 kb)

Submission Input :

Attached. Two pages, signed.

-Marcus Griffith

President

Esther Short Neighborhood Association.

Esther Short Neighborhood Association
EstherShortNeighborhood@Gmail.com

Interstate Bridge Replacement Program
ATTN: Draft SEIS Public Comment
DraftSEIS@InterstateBridge.org

Nov. 18, 2024

To Whom It May Concern:

The Board of Esther Short Neighborhood Association voted unanimously to submit this letter on behalf of the Esther Short Neighborhood Association.

The Esther Short Neighborhood Association in downtown Vancouver, Washington is concerned with the temporary and lasting effects of the IBR Project and encourages the IBR Project to include appropriate mitigation plans to reduce those temporary and lasting effects. In addition, the Esther Short Neighborhood Association requests a review of several topics not currently addressed by the draft SEIS.

The draft SEIS identifies a wide range of temporary effects, including noise, vibration, dust, emission, traffic delays, traffic spillover into neighborhoods, and sidewalk disruptions. The draft SEIS also indicates the Esther Short Neighborhood is best be classified as an Equity Priority Communities given the demographics of the neighborhood[1].

The ESNA Board appreciates the significant effort the IBR team has made to make the draft SEIS as comprehensive as possible. The ESNA Board would like to submit the compiled concerns of members of the neighborhood for rereview.

The draft SEIS does not appear to take into full consideration the age of buildings, the presence (or lack of) filtered ventilation systems, the age of plumbing for buildings subject to vibration damage. These details could alter the total impact the IBR Project could have during the construction phase. The tentative plan to video document basements appears to presume all damage will be visible and seems to ignore the very real issue with damage to underground pipes and micro-factures that might be impossible to visually document.

The draft SEIS does not appear to include current baseline noise and vibration from the airports in the area, or the existing motor-vehicle related noise disturbance impacting the neighborhood. Including those sources of noise and vibration could shift the total noise and vibration impacts over acceptable thresholds using a noise dose calculation or other standards.

---

[1] Draft SIES 3.5-26: 25% of residents report having a disability, 50.6% of the population living at the low-income level and 31% of households not owning a car.

The draft SEIS does not appear to include an assessment of how temporary effects will impact neighborhood parks, and playgrounds near the construction area. Given the inherent vulnerability of children, these impacts could have significant health impacts.

The draft SEIS does not appear to assess the mobility impairments of neighborhood residents through the lens of sidewalk disruptions and spillover traffic. Several senior centers in the neighborhood are likely to have extreme disruptions from spillover traffic, which will pose additional challenges to mobility impaired residents.

The draft SEIS does not appear to include an assessment of spill over traffic through side streets between the I-5 and I-205 interchange. The use of residential streets as cross-city short cuts during I-5 traffic congestion is a known issue and shows that spill over traffic is a concern that greatly exceeds the 6th Street and Mill Plain interchange areas.

The draft SEIS does not appear address emergency vehicle access to the area of Lower Main during spillover traffic congestion. Several buildings in the Lower Main area are high-call locations for emergency services. Delayed response times could contribute to an increase in response times and a decrease in preferred outcomes.

The draft SEIS does not appear to address loss of view and loss of privacy issues with the raised freeway and new bridge alignment. It is not clear how many residences, and which buildings, will have this issue as the draft SEIS appears to be silent on this topic.

-Respectfully submitted on behalf of the Esther Short Neighborhood Association,

11/18/2024

Marcus E. L. Griffith
President
Esther Short Neighborhood Association

Esther Short Neighborhood Association
EstherShortNeighborhood@Gmail.com

Interstate Bridge Replacement Program
ATTN: Draft SEIS Public Comment
DraftSEIS@InterstateBridge.org

Nov. 18, 2024

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-Respectfully submitted on behalf of the Esther Short Neighborhood Association,

11/18/2024

Marcus E. L. Griffith
President
Esther Short Neighborhood Association

Esther Short Neighborhood Association
EstherShortNeighborhood@Gmail.com

Interstate Bridge Replacement Program
ATTN: Draft SEIS Public Comment
DraftSEIS@InterstateBridge.org

Nov. 18, 2024

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The draft SEIS does not appear to include current baseline noise and vibration from the airports in the area, or the existing motor-vehicle related noise disturbance impacting the neighborhood. Including those sources of noise and vibration could shift the total noise and vibration impacts over acceptable thresholds using a noise dose calculation or other standards.

---

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The draft SEIS does not appear to address loss of view and loss of privacy issues with the raised freeway and new bridge alignment. It is not clear how many residences, and which buildings, will have this issue as the draft SEIS appears to be silent on this topic.

-Respectfully submitted on behalf of the Esther Short Neighborhood Association,

11/18/2024

Marcus E. L. Griffith
President
Esther Short Neighborhood Association

IBR Draft SEIS - RECORD #3240 DETAIL

First Name :	Erinne
Last Name :	Goodell
Attachments :	DSEIS-3240_Goodell_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #3240 DETAIL

Submission Date : 11/18/2024
First Name : Erinne
Last Name : Goodell
Business/Organization/Agency :

Submission Input :

First Name:
Erinne

Last Name:
Goodell

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Climate Change

Comment:
Transportation is our largest source of climate pollution, and we need to make sure that transit and the multi-modal path on this bridge are top notch and that tolling is appropriate to encourage people to minimize car trips. If we have a class A light rail system to get across the Columbia River and connect our two cities, while drivers have a proper-sized toll to pay, we have a shot at reducing vehicle miles traveled. Anything less is a disservice to our children and the future of our two states.

JCA comment #: 838

IBR Draft SEIS - RECORD #3241 DETAIL

First Name :	Andrew
Last Name :	Leyva
Attachments :	D1_3241_Leyva_20241118_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #3241 DETAIL

Submission Date : 11/18/2024
First Name : Andrew
Last Name : Leyva
Business/Organization/Agency :

Submission Input :

First Name:
Andrew

Last Name:
Leyva

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
We need to be investing in public transit and electric buses not more highways that encourage people to drive cars. Climate change is real and is the biggest threat and danger that we face. We need to take it seriously.

JCA comment #: 837

IBR Draft SEIS - RECORD #3242 DETAIL

First Name :	Matt
Last Name :	Butler
Attachments :	D1_3242_Butler_20241118_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #3242 DETAIL

Submission Date : 11/18/2024
First Name : Matt
Last Name : Butler
Business/Organization/Agency :

Submission Input :

First Name:
Matt

Last Name:
Butler

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
I support the positions outlined by No More Freeways and the Just Crossing Alliance

JCA comment #: 836

IBR Draft SEIS - RECORD #3243 DETAIL

First Name :	Erinne
Last Name :	Goodell
Attachments :	D1_3242_Goodell_20241118_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #3243 DETAIL

Submission Date : 11/18/2024
First Name : Erinne
Last Name : Goodell
Business/Organization/Agency :

Submission Input :

First Name:
Erinne

Last Name:
Goodell

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
As a person dependent on my bicycle for transportation, I am very concerned about the height and grade to reach the bridge, especially on the Vancouver side. a 4.5% grade circular path is not accessible for many people, even able-bodied riders. We MUST make traveling across the I-5 bridge more appealing for people riding and rolling across the bridge. The bridge will need to have a lower path or elevators (that work consistently and well!) for users. I have experienced many elevators (like the one on the Gibbs Street Pedestrian Bridge) frequently out of service and always very slow. I'll also add that a route that tacks a mile on to the trip to access the bridge on bike is really disappointing.

I am also concerned about connectivity between the bridge and existing multi-modal infrastructure, specifically

the Williams/Vancouver corridor (which I frequently use for commuting). There are also specific points with the new design that will cause conflicts between freight and multi-modal users - I urge you to find solutions that prioritize separated infrastructure for people biking and walking. The Marine Drive interchange is one area that has been highlighted as a potential conflict zone. Again, we must make biking and walking attractive and safe for people of all ages and abilities - not just the strong and fearless.

In addition, the multi-use trail must be located on the same side of the bridge as transit. It makes no sense to have these facilities on different sides, as it makes it very inconvenient to access transit or to change from transit to bicycling/walking without going out of direction. Having transit on the same side as the multi-modal path will also add the benefit of providing a buffer between general traffic and the MUP (including a buffer from the garbage that sometimes flies off/out of automobiles), and transit operators and riders provide an extra presence for the path to reduce the feeling of isolation and increasing the feeling of safety. Additionally, adequate lighting on the trail is necessary for the safety of users.

JCA comment #: 835

IBR Draft SEIS - RECORD #3244 DETAIL

First Name :	Rebecca
Last Name :	Small
Attachments :	D1_3244_Small_20241118_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #3244 DETAIL

Submission Date : 11/18/2024
First Name : Rebecca
Last Name : Small
Business/Organization/Agency :

Submission Input :

First Name:
Rebecca

Last Name:
Small

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
I object to the inclusion of a second auxiliary lane in the IBR project. The Draft Supplemental Environmental Impact Statement (DSEIS) fails to provide sufficient justification for this addition, and it risks prioritizing freeway expansion over more pressing community and environmental needs.

Instead, the IBR project should focus on a streamlined plan centered on replacing the aging bridge, enhancing

transit options, and improving active transportation infrastructure. This approach would be both more cost-effective and better aligned with the values of our region.

Adding a second auxiliary lane would exacerbate several critical issues:
** Air Quality: Both Portland and Vancouver already suffer from poor air quality, and increased traffic emissions would further degrade public health and environmental conditions.
* Noise Pollution: Downtown Vancouver's quality of life would be significantly impacted by higher levels of noise pollution resulting from expanded freeway capacity.
* Increased Emissions: The environmental impact extends beyond traffic. The materials required for additional bridge construction, coupled with the lifetime emissions from induced traffic, would significantly increase the project's carbon footprint.

Expanding freeway capacity has repeatedly proven ineffective at reducing congestion, as evidenced by Los Angeles' endless cycle of freeway expansions that only induce more traffic. This is not the path we should follow in the Pacific Northwest—a region known for its commitment to sustainability and smart urban planning.

I urge decision-makers to reject the proposal for a second auxiliary lane and focus on a future-oriented project that truly serves the needs of our communities while protecting our environment.

JCA comment #: 833

IBR Draft SEIS - RECORD #3245 DETAIL

First Name :	Nick
Last Name :	Wood
Attachments :	D1_3245_Wood_20241118_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #3245 DETAIL

Submission Date : 11/18/2024
First Name : Nick
Last Name : Wood
Business/Organization/Agency :

Submission Input :

First Name:
Nick

Last Name:
Wood

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
As a longtime Oregon resident, I encourage the IBR Project to select a design that focuses on improving the I5 bridge for all users, including transit and active transportation users.
A substantial investment in public-transit capacity as part of the IBR could significantly reduce regional demand for auto throughput while reducing project costs. This should maximize the benefit to all regional residents and provide a faster path to project completion.

JCA comment #: 832

IBR Draft SEIS - RECORD #3246 DETAIL

First Name :	Satya
Last Name :	Vayu
Attachments :	D1_3246_Vayu_20241118_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #3246 DETAIL

Submission Date : 11/18/2024
First Name : Satya
Last Name : Vayu
Business/Organization/Agency :

Submission Input :

First Name:
Satya

Last Name:
Vayu

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
I believe that prioritizing a streamlined project focused on bridge replacement, transit enhancements, and active transportation—without extensive freeway expansion—would be more beneficial and cost-effective. The DSEIS does not provide sufficient justification for a second auxiliary lane. I feel that increased traffic under any scenario poses serious health risks and exacerbates negative outcomes for priority communities. 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. In addition, traffic modeling must realistically account for induced demand to ensure accurate projections for transit and road use. I think we need to 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. And stations should be built to support four-car trains now to align with future downtown transit tunnel upgrades. As for active transportation, transit and the multi-use path should be next to each other, for seamless transfers and ease of use. Positioning transit lanes as buffers between the multi-use path and vehicle lanes can reduce noise, debris, and enhance user safety.

JCA comment #: 831

IBR Draft SEIS - RECORD #3247 DETAIL

First Name :	Jennifer
Last Name :	Starkey
Attachments :	D1_3247_Starkey_20241118_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #3247 DETAIL

Submission Date : 11/18/2024
First Name : Jennifer
Last Name : Starkey
Business/Organization/Agency :

Submission Input :

First Name:
Jennifer

Last Name:
Starkey

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
Hi, I grew up in Portland and have been a resident of the Piedmont neighborhood near the intersection of Lombard & Albina since 2012.

I-5 and car traffic negatively affect too much of my life - it is a source of noise, air pollution, speeding, and all the infrastructure around my neighborhood prioritizes cars and trucks getting on the freeway to go to

Washington. The heavy presence of cars and trucks all around makes it unsafe and unpleasant to cycle or walk. My neighbors and I deserve infrastructure that makes it easy and pleasant to walk, cycle, and take public transportation. We cannot be investing in projects that accelerate the climate crisis.

I don't really have a discourse in traffic modeling but I do have a discourse in living in N Portland near I-5 in the escalating heat and record rainfall and ice storms and wind - I am writing to echo points made by the advocacy group No More Freeways, who have written to you: "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."

Please give attention to the letter ("Supplemental Comments on IBR DSEIS") provided today by Joe Cortright, City Observatory and Chris Smith, No More Freeways as you plan and implement this infrastructure.

Sincerely,
Jennifer

JCA comment #: 830

IBR Draft SEIS - RECORD #3248 DETAIL

First Name :	Jeffrey
Last Name :	Lesh
Attachments :	D1_3248_Lesh_20241118_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #3248 DETAIL

Submission Date : 11/18/2024
First Name : Jeffrey
Last Name : Lesh
Business/Organization/Agency :

Submission Input :

First Name:
Jeffrey

Last Name:
Lesh

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
Please plan for and build transit stations that allow room for four car MAX trains. To best respond to climate change we need to prepare and begin shifting more and more travel to higher capacity methods than private cars and trucks. One of the most convenient high capacity modes in our region is the MAX train which will likely be expanded to four cars once a MAX tunnel is built under Portland, a priority TriMet project.

JCA comment #: 829

IBR Draft SEIS - RECORD #3249 DETAIL

First Name :	Kirsten
Last Name :	Wright
Attachments :	D1_3249_Wright_20241118_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #3249 DETAIL

Submission Date : 11/18/2024
First Name : Kirsten
Last Name : Wright
Business/Organization/Agency :

Submission Input :

First Name:
Kirsten

Last Name:
Wright

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Topic Area:
Transportation

Comment:
To Whom It May Concern,

I am a long-time Portland resident and an avid cyclist. It is very important to me that the new I5 bridge exhibits excellent connectivity and safety for cyclists and pedestrians. Please ensure that cyclists and pedestrians can easily and safely access the bridge by selecting a design that promotes connectivity. A bridge that is highly accessible to walkers, runners and bikers will add to the climate-forward and health-oriented infrastructure our community is known for.

JCA comment #: 828

IBR Draft SEIS - RECORD #3250 DETAIL

First Name :	Katharine
Last Name :	Aaberg
Attachments :	D1_3250_Aaberg_20241118_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #3250 DETAIL

Submission Date : 11/18/2024
First Name : Katharine
Last Name : Aaberg
Business/Organization/Agency :

Submission Input :

First Name:
Katharine

Last Name:
Aaberg

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
Please put the multi-use path and public transit on the same side of the bridge. I am a Portland resident who often goes to Vancouver for business and shopping, and I use bike. walking and public transit as my main modes. Often I use a combination of bike and transit, and having these two modes on the same side of the bridge is key for riders like me. This also allows the transit lane to be used as a safety buffer, separating pedestrians and bikes from car traffic.

JCA comment #: 827

IBR Draft SEIS - RECORD #3251 DETAIL

First Name :	Alexis
Last Name :	McCain
Attachments :	D1_3251_McCain_20241118_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #3251 DETAIL

Submission Date : 11/18/2024
First Name : Alexis
Last Name : McCain
Business/Organization/Agency :

Submission Input :

First Name:
Alexis

Last Name:
McCain

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
I would love for the city to stop investing in infrastructure for cars. I try to bike and use public transportation to get around and there are still improvements to be made to public transit and bike and walkability safety through the city. I want to see more max lines, more speed bumps, physical barriers between car and bike lanes. Efforts to reduce speeding through the city and improve dangerous traffic conditions on roads like 82nd and high crash intersections. Let’s make getting around the city on bike and foot safer and more convenient. Let’s stop

prioritizing cars in a city where we really don’t have anywhere for people to park as is. Many people in my neighborhood and community tell me that they would use public transit more often if it was faster and more accessible.

JCA comment #: 826

IBR Draft SEIS - RECORD #3253 DETAIL

First Name :	Carlos
Last Name :	Avalos
Attachments :	D1_3253_Avalos_20241118_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #3253 DETAIL

Submission Date :	11/18/2024
First Name :	Carlos
Last Name :	Avalos
Business/Organization/Agency :	

Submission Input :

I support this project and improving access to public transit, while trying to reduce crashes and congestion during high traffic hours. Sounds great for our local communities, and those that commute to support our families and businesses.

IBR Draft SEIS - RECORD #3254 DETAIL

First Name :	Cale
Last Name :	Bickler
Attachments :	D1_3254_Bickler_20241118_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #3254 DETAIL

Submission Date :	11/18/2024
First Name :	Cale
Last Name :	Bickler
Business/Organization/Agency :	

Submission Input :

Environmentalists don't widen freeways. Reduce car capacity and increase public transit walking and biking.

IBR Draft SEIS - RECORD #3255 DETAIL

First Name :	Michael
Last Name :	Trabert
Attachments :	D1_3255_Trabert_20241118_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #3255 DETAIL

Submission Date : 11/18/2024

First Name : Michael

Last Name : Trabert

Business/Organization/Agency :

Submission Input :

1. Please make the biking and walking areas a pleasant to be with art and amenities.
2. There needs to be an elevator or stairs to get up to the walking/biking part of the bridge. Making all people walk/bike a half-mile loop just to get on the bridge is untenable.
3. Please make the bridge with as few lanes for cars possible. More lanes will only induce demand.
4. Please include a sound wall for the part of the bridge facing the Vancouver waterfront. Cars are very loud and I don't see how being there will be pleasant with very loud cars nearby.

IBR Draft SEIS - RECORD #3256 DETAIL

First Name :	Zack
Last Name :	N
Attachments :	D1_3256_ZachN_20241118_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #3256 DETAIL

Submission Date :	11/18/2024
First Name :	Zack
Last Name :	N
Business/Organization/Agency :	

Submission Input :

Floating wetlands! Chicago esc!

IBR Draft SEIS - RECORD #3257 DETAIL

First Name :	A
Last Name :	P
Attachments :	D1_3257_AP_20241118_Original.pdf (3 kb)

IBR Draft SEIS - RECORD #3257 DETAIL

Submission Date : 11/18/2024

First Name : A

Last Name : P

Business/Organization/Agency :

Submission Input :

I don't have a specific design that I prefer as long as light rail is included, there are pedestrian and bike paths that are safe, and it improves the conditions in this area during typical and rush hour traffic. The Washington side needs to begin investing in light rail, and combining with TriMet would be a great way to capitalize on the efficiencies. It might bring interest in putting some options for the core parts of major roads in Clark county as I found light rail to be very efficient when I lived on the Oregon side and wish that I had a way to take light rail into downtown Portland from Vancouver or Camas (Light rail to the Portland airport was the best as I could avoid dealing with airport parking and it was easy to get home after a long trip and would be a wonderful addition to have a connection to Washington from Camas /Vancouver). I enjoyed reading or listening to music during the commute and not having to stress about traffic so I think leaving light rail off the bridge would be a huge mistake. My biggest concern is the tolls. While I understand that it has to be paid for somehow, the current proposed tolls disproportionately affect Washington residents who tend to work more often in Oregon and generally live on the Washington side because it costs less. These people are already paying a portion of their income to the state of Oregon because they work there that they cannot fully reclaim at tax time, and there are only 2 bridges currently in the area to cross the border. Add to that Oregon's plan to possibly toll the entire metro area on I5 to pay for improvements to the freeway, and it is a lot. Even the Oregonians who live in the neighborhoods just off this section of I5 tend to be lower income earners and would be disproportionately affected not only by the cost of the tolls, but also by the traffic going through their neighborhoods to avoid the tolls. As Atlanta found, people will find ways to avoid the tolls, so neighborhood traffic increased even though it takes additional time to get places because people did not get transparent pricing and never knew what it would cost at any given point in time. Oregon City was not incorrect when they said that is what would happen because I have seen it in other places I have lived or visited. People will take the Glen Jackson bridge more frequently to avoid the tolls, which will also increase traffic there. Find another way to pay for it... Maybe use some fees from vehicle registrations or driver's licenses to cover the costs or find another way that is equal. If you use fees from vehicle registrations and licenses, you can continue to use these funds for projects in other parts of the state and it will apply equally to all people in both states who are licensed and own vehicles. Since there will be other projects, it seems like a better way to raise funds on an ongoing basis rather than having a toll, which if I'm not mistaken, one of the two states will only allow for the duration of the time to meet the stated funding goal. Putting a long term toll on a major freeway and trade route is going to result in people finding ways to avoid it, even if it means going out of their way. For me personally, there are a lot of reasons that I still cross the bridge and I will limit the number of trips as well as find alternatives. If a lot of people do this, it will take longer to reach the toll funding goal and there will need to be alternatives to reach that amount. The amount proposed for tolls with no exceptions for low income or hardship is too high for me. I would rather pay for a bus ticket and spend more time in transit than pay ~ $5 each way to cross the bridge as was on the last tolling proposal I saw. Or better yet, I will find ways not to have to cross at all whenever I can. Both states benefit from people going back and forth for work, healthcare, and leisure, so let's find a way to not discourage that. Adding a fee to something that people need anyway is more equitable and can be a longer term solution if the funds are put in a special transportation fund for each state for current and future projects. Or maybe do a fundraiser where people can buy "plaques" that they helped fund the bridge and get to have their name on it.

Or maybe allocate a portion of the gas taxes to the project or add a fee at electric vehicle charging stations for this. I'm sure that a task force could propose some ideas that would work outside these.

IBR Draft SEIS - RECORD #3258 DETAIL

First Name :	Alyssa
Last Name :	McGhghy
Attachments :	DSEIS-3258_McGhghy_Original.pdf (3 kb)

IBR Draft SEIS - RECORD #3258 DETAIL

Submission Date : 11/18/2024
First Name : Alyssa
Last Name : McGhghy
Business/Organization/Agency :

Submission Input :

I have reviewed the lengthy Interstate Bridge Draft Environmental Statement and accompanying supplemental materials. After studying the documents, I have several concerns regarding the project's impact on pedestrians, bicyclists, local businesses, and the environment.

First, the design of the bridge and associated roadway expansion prioritizes motor vehicle traffic at the expense of accessible and convenient options for pedestrians and cyclists. While the project significantly increases capacity for cars—adding four additional motor vehicle lanes (expanding from 10 to 14 lanes) under Evergreen Blvd. in Vancouver—there is little consideration for enhancing active transportation infrastructure. This expansion of concrete will displace green spaces, destroy local businesses, and disrupt the character of the downtown Vancouver area, including the historic Fort Vancouver region.

The addition of four motor vehicle lanes represents a 28% increase in the highway's width, which will not only consume more land and vegetation, but will also contribute to higher levels of air pollution, tire byproducts, and noise, all of which will negatively affect the core of Vancouver.

I am also concerned about the design of the bicycle and pedestrian pathways, which are both cumbersome and impractical. On the Vancouver side, the access ramps for these pathways are awkwardly designed, forcing active transportation users to navigate convoluted routes to reach the bridge's elevated pathway, which is 100 feet (10 stories) above the ground. This will create a tall and exposed crossing with significant wind, noise, and temperature challenges—likely deterring people from choosing walking or biking as viable options. The lack of shading and greenery along these pathways will exacerbate the impact of the elements, making the crossing uncomfortable, especially in summer months.

Additionally, the wider motor vehicle lanes on Hayden Island will displace thriving local businesses, increase air and noise pollution, and elevate the cost of maintenance. This expansion will also worsen congestion throughout the I-5 corridor in Vancouver and Portland, ultimately creating a more polluted and less efficient transportation environment for everyone.

Another issue is the bicycle and pedestrian access to North Portland. The route provided for non-motorized traffic is circuitous and indirect, making it significantly harder to navigate compared to the direct path offered to motor vehicles. This undermines the goal of providing efficient, equitable access for all modes of transportation.

As someone who works in active transportation within city government, I've seen firsthand the many benefits that walking, biking, and rolling can bring to a community. These modes of transport help improve public health, reduce congestion, lower carbon emissions, and provide more equitable access to essential services. I have witnessed how communities thrive when people have safe, convenient, and accessible routes for walking and biking. Investing in active transportation infrastructure is a crucial step toward creating healthier, more sustainable, and livable cities, and it's disheartening to see these needs sidelined in favor of more car-centric

solutions.

Furthermore, it’s important to note that expanding highways and adding more lanes rarely leads to reduced congestion in the long run. History has shown that instead of easing traffic flows, wider roads simply encourage more people to drive, until the expanded capacity fills up again, leading to gridlock just as bad—if not worse—than before. The addition of more lanes only serves to attract more cars, ultimately clogging up the roadway and failing to solve the core problem of traffic congestion.

In conclusion, the current design of the Interstate Bridge project negatively impacts human health, local development, and environmental sustainability. It expands motor vehicle use, increases pollution, and undermines climate goals, while offering minimal improvements for active transportation. The project should be reconsidered and scaled back to provide safer, more efficient options for pedestrians, cyclists, and public transit users.

IBR Draft SEIS - RECORD #3259 DETAIL

First Name :	Tom
Last Name :	Gevurtz
Attachments :	D1_3259_Gevurtz_20241118_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #3259 DETAIL

Submission Date : 11/18/2024

First Name : Tom

Last Name : Gevurtz

Business/Organization/Agency :

Submission Input :

Thank you for the opportunity to provide comments regarding the design of the I-5 Bridge. With our future in mind, I feel strongly that this bridge should have 'true' handicap access to bike lanes, walking across, and light rail. There should be safe separation from the road for these three additional ways to cross the river. I agree with those who suggest multiple bump outs large enough for 5 people to stand and sit, out of the way from moving travelers. Benches with backs, as well as plenty of room for wheelchairs, is critical to making this bridge truly ACCESSIBLE to all who desire to cross safely. I am not opposed to tolls for the drivers. Thank you again for this opportunity to be heard! Tom Gevurtz

IBR Draft SEIS - RECORD #3260 DETAIL

First Name :	Brady
Last Name :	Ashton
Attachments :	D1_3260_Ashton_20241118_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #3260 DETAIL

Submission Date : 11/18/2024
First Name : Brady
Last Name : Ashton
Business/Organization/Agency :

Submission Input :

My household strongly recommends the I-5 replacement bridge come with light rail options, ideally with a connection (or plans to connect) the light rail to PDX airport. This would allow tourism to flow directly into the heart of walkable downtown Vancouver. This leaves a great first impression and creates a strong economic hub for commercial zoning.

Secondly, we desperately urge the decision makers of this replacement bridge to show special importance toward the form and aesthetic of the bridge. This is an incredibly unique opportunity that we must seize to re-establish Portland and Vancouver as world-class cities. Bridges always have cultural impacts that cannot be ignored. The Golden Gate Bridge, London Bridge, and the Sydney Harbor Bridge are resounding examples of how bridges can be a cornerstone to a city's cultural projection. Likewise, simple bridges of concrete and no aesthetic serve their function; however, they too projects a city's culture--typically that of dull functionality and seriousness. These concrete bridges inspire no awe, and our wonderful and cultured cities have earned a replacement bridge that matches or exceeds the beauty they present to the world.

IBR Draft SEIS - RECORD #3261 DETAIL

First Name :	Robyn
Last Name :	Watkins
Attachments :	D1_3261_Watkins_20241118_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #3261 DETAIL

Submission Date : 11/18/2024
First Name : Robyn
Last Name : Watkins
Business/Organization/Agency :

Submission Input :

My home is located along "I" Street, one of the areas most affected by the impending IBR project. It was built in 1910, and my family has lived here since 1985. Because of the age of my home, I would have thought it might be considered one of the historic properties, but I was not notified regarding that. While I understand the need for such extensive construction, I am fearful of what it will mean for the livability of my home and my neighborhood as well as for the challenges it will present. We will be affected negatively every day in 4 of the 5 basic human senses: sight, hearing, smell, and touch, for the duration of several years as the project is underway. Additionally, it is possible that my home may suffer foundational damage as heavy underground construction is taking place. I do not want to leave my home, but the vision of what my quality of life might be for the next several years to come, before, during and after completion, is very unpleasant and may force me to do just that, and to do it before my home loses its value. As the IBR moves closer to finalizing plans, please consider the smaller group made up of individuals, families, neighborhoods, livelihoods, and properties as you are considering efficiencies for the masses.

Thank you for reading my comments.

Sincerely,

Robyn Watkins

IBR Draft SEIS - RECORD #3262 DETAIL

First Name :	John
Last Name :	Reesman
Attachments :	D1_3262_Reesman_20241118_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #3262 DETAIL

Submission Date : 11/18/2024

First Name : John

Last Name : Reesman

Business/Organization/Agency :

Submission Input :

Recent revelations that the model used to estimate future road traffic on the bridge are wrong and inflate traffic forecasts undermines my faith in the planning process and leads me to suspect that traffic forecasts were generated to support a massive freeway building projects on both the the Portland and Vancouver sides of the river. The estimates need to be redone and vetted by honest, disinterested experts who do not stand to gain financially or politically by overbuilding the project. We need a new bridge. We don't need new freeways.

IBR Draft SEIS - RECORD #3263 DETAIL

First Name :	Karen
Last Name :	Holcomb
Attachments :	D1_3263_Holcomb_20241118_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #3263 DETAIL

Submission Date : 11/18/2024

First Name : Karen

Last Name : Holcomb

Business/Organization/Agency :

Submission Input :

As a person who worked in Portland I can tell you I would be hard pressed to use a MAX train that only comes across the I-5 Bridge barely into Vancouver. Depending on where people live it is much more convenient to go to a Park and Ride closer to ones home and hop on an Express Bus that goes directly downtown with limited stops and is transporting mainly workers to work. The MAX would not be "EXPRESS", it would stop multiple times before even getting close to downtown. I can tell you when I did ride the MAX from the Lloyd Center area to Parkrose to catch an Express Bus home it was a nightmare when the temperatures got too warm or there was snow. For the cost of bringing LightRail to Vancouver what is the benefit when there is no Express Route to move commuters in a more timely fashion. I'd rather have more buses with Carpool lanes available where I stand a much better chance of getting to sit in a seat to my final destination and also have a shorter commute to my home from a Park and Ride located closer to my home. Light Rail just doesn't seem to have any value added and as a Clark County resident who works in Portland I'm already paying Oregon Income Tax which doesn't provide any benefit to me as a Washington resident.

IBR Draft SEIS - RECORD #3264 DETAIL

First Name :	Steve
Last Name :	Dotterrer
Attachments :	D1_3264_Dotterrer_20241118_Original.pdf (2 kb)

IBR Draft SEIS - RECORD #3264 DETAIL

Submission Date :	11/18/2024
First Name :	Steve
Last Name :	Dotterrer
Business/Organization/Agency :	IBR Section 106 Consulting Parties member from the Architectural Heritage Center

Submission Input :

These comments are mainly related to the SDEIS Section 3.8 Cultural Resources and the related technical reports. Section 3.8 of the SDEIS provides limited and incomplete description of impacts to cultural resources.

1. The removal of both the northbound and southbound I-5 bridges means more than the removal of physical objects. It removes almost the entirety of 20th century transportation history of this significant river crossing. Complete removal of this visible history, while it may be necessary to meet the project's purpose and need, deserves more than a line or two in a matrix. At a minimum, it warrants a strong commitment to mitigation measures for cultural resources in the area of the river crossing.

2. Most of the cultural resources that remain after the IBR project is completed are located in Vancouver-many at Providence Academy and the Vancouver Historic Reserve. We support the comments by the Historic Trust on the SDEIS. These point out that the description of resources is incomplete. It does not include more recent information or the entire period of significance for some resources. It also fails to adequately address the very specific impacts on these resources beyond the individual buildings- small purchases of land area or construction period changes and impacts may seem insignificant to the larger IBR project. But they can materially affect the financial and functional viability of the resource for future use. As the final project alignments are identified, detailed impacts (loss of parking and easy access, increased noise and air pollution, etc.) on this viability and appropriate mitigation should be included. Cultural resources need to have continued viability if they are to remain part of the community.

3. During discussions at the Section 106 Consulting Parties meetings, there was agreement that mitigation measures can extend beyond the APE. This commitment should be reflected in the SDEIS.

4. As further mitigation measures are developed, they should focus on the future--insuring the use and viability of the cultural resources in the area. Without that viability, they can not continue to tell their stories.

Thank you for the opportunity to comment on this SDEIS

IBR Draft SEIS - RECORD #3265 DETAIL

First Name :	Linda
Last Name :	Quinn
Attachments :	D1_3265_Quinn_20241118_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #3265 DETAIL

Submission Date :	11/18/2024
First Name :	Linda
Last Name :	Quinn
Business/Organization/Agency :	Exp Realty

Submission Input :

I agree with the statements on the 1-31 platform. This
Would make inflation hit families with 2 cars , realtors, Uber, delivery's , Services & Goods would need to rise.
And to make it permanent is atrocious!! We are being taxed enough!

IBR Draft SEIS - RECORD #3266 DETAIL

First Name :	Keith
Last Name :	Townsend
Attachments :	D1_3266_Townsend_20241118_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #3266 DETAIL

Submission Date :	11/18/2024
First Name :	Keith
Last Name :	Townsend
Business/Organization/Agency :	

Submission Input :

I would suggest that the old bridge be retained and used for local access It can include light rail in a travel lane and bicycle on one span. Keep the new bridge for automobile and commerce traffic only, like any other part of I-5. The new bridge needs at least four lanes of traffic in each direction.

If I-217 was extended and made into a secondary bypass, like I-205, would help relieve the congestion on I-5 as well. I'm all for bikes, pedestrians, and light rail, but not on I-5.
Thanks!

IBR Draft SEIS - RECORD #3267 DETAIL

First Name :	Ann
Last Name :	Makar
Attachments :	DSEIS-3267_Makar_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #3267 DETAIL

Submission Date :	11/18/2024
First Name :	Ann
Last Name :	Makar
Business/Organization/Agency :	

Submission Input :

The primary objective should be to move VEHICLES efficiently. Please consider single parents who must take children to a childcare provider and get to work on the other side of the river. Parents must pay for childcare time; they need EFFICIENT transportation in order to minimize the cost of childcare and minimize time AWAY FROM their children.
Vehicle engines idling in traffic cause pollution and waste fuel; EFFICIENCY is key.
No light rail, please!

IBR Draft SEIS - RECORD #3268 DETAIL

First Name :	Tanya
Last Name :	Sharratt
Attachments :	DSEIS-3268_Sharratt_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #3268 DETAIL

Submission Date :	11/18/2024
First Name :	Tanya
Last Name :	Sharratt
Business/Organization/Agency :	

Submission Input :

Please no tolls. We can’t afford it. Also, we can’t afford the light rail. I point to living in DC and seeing how expensive any metro is. Not worth it. People are not just going to downtown. That era is over.

IBR Draft SEIS - RECORD #3269 DETAIL

First Name :	Dean
Last Name :	Suhr
Attachments :	DSEIS-3269_VoteBeforeTollsCommittee_Original.pdf (5 kb)

IBR Draft SEIS - RECORD #3269 DETAIL

Submission Date :	11/18/2024
First Name :	Dean
Last Name :	Suhr
Business/Organization/Agency :	Vote Before Tolls Committee

Submission Input :

Vote Before Tolls Committee represents a broad cross-section of the Oregon community that expects to first be impacted by tolls.

We absolutely agree that replacement bridge is necessary and we know we need to pay for it. But we don't want the current politician's boondoggle that costs more than we can afford without solving today's and the future problems of efficient transportation. $9B to replace three narrow lanes with wider lanes is a $2.54M per foot boondoggle.

Common sense needs to prevail. The public demands a seat at the table to be involved in re-focusing reigning in this project. It's our bridge, our cash, our table, our commutes, our freight and frankly, our bridge!

The Environmental study and response needs to include the policy landscape. IP-31, a citizen driven Oregon Constitutional Amendment, gives
voters the right to vote before all new tolls ... forcing accountability by ODOT, PBOT, Ti-MET, and our state legislators. It is retractive and covers all bridges, roads, and highways. It covers tolls affecting all vehicles and forms of transport – cars, motorcycles, trucks, and even bicycles who think they will never be charged for their infrastructure. It is retroactive covering all tolls starting after 2017. The taxpaying voters in Oregon are fed up with the state leadership's spend, spend, spend philosophy and when IP-31 passes on the 2026 ballot the funding for projects planning on tolling will be at risk. In fact, the funding is at risk now. The Oregon legislature leadership shut down all discussions about tolling during last year's session and are on a path to do the same in 2025. - for their many multi-billion dollar tolling spending sprees including the IBR, Abernethy Bridge, Rose Quarter, Hwy 217, and Hwy 26 tolling proposals – and any others that come up.

Our concerns are as follows:

1) Washington's Good To Go tolling infrastructure is not compatable with EZ-Pass, the system used by nearly all of the rest of the nation. The tolling infrastructure needs to be integrated with EZ-Pass from the beginning.

2) The $ - $. as a default funding source. The cost of the bridge is spiraling out of control. Just 11 months ago, in December 2023, IBR project director Greg Johnson told us the bridge would cost $6B. ' $ and rising. While we admit construction costs are up - they are not up 50% in just ONE year!

3) Less than HALF the funding is already lined up. Oregon, Washington, and the Federal government have already chipped in billions. The extraordinary and growing balance cannot simply default to tolling.

4) The tolls are being placed squarely on the backs and from the wallets of those who cross the bridge. The toll share was $1.5B last year, now ' % $. and tolls will continue to be the "subtract answer" plugging the funding

gap as project costs continue to rise.

5) Tolls are currently estimated to peak at $ $, for a daily commuter. This is simply unaffordable for the average commuter. This is out of control, not equitable, and not reasonable. Many of those commuting connot shift their schedules to adjust to congestion pricing.

6) The bridge rebuild appropriately increases earthquake resilance, but it only adds a few inches of lane width but NO MORE vehicle capacity.
-> The replacement bridge is planned to have 3 lanes north and south, the same as it did when the second span was opened 6 years ago in 1958. Auxilary lanes will reduce congestion due to merging and provide temporary relief, but do not add to overall capacity of the bridge.
-> Spending $9B for a bridge that is already out of capacity and certainly will not handle another 66 years of regional growth is absurd. Does any politician or transportation leader think traffic will decline or the PNW region will not grow over the next 66 years?
-> Adding one more lane, or at least making sure the pilings are designed to support at least one more future lane in each direction now would be an incremental cost and will somewhat future-proof the bridge.

7) The tolls will not sunset (stop) when construction costs are paid off – they will go on forever. This makes tolling not just a capital source but also a statewide tronsportation revenue source. Not just project funding but a new perpetual tax.

8) Light rail, at $1 billion a mile, is the most expensive light rail project on earth! Our leaders want us to pay $2B for this expansion and then to subsidize the fares of the travelers PLUS the ongoing maintenance/operation of the bridge for their portion their travels since they won't be paying tolls or fully loaded MAX fares!
-> This is a major cost add-on to the project that does not improve the primary function of the bridge which is the efficient transport of vehicles and freight.
-> The general public in SW Washington and those of us in Oregon don't want this expansion ... and we can't afford it.
-> Metro already owns the Expo Center - I am sure we can triple the parking lot size there and add C-Tran busses to accommodate the few hundred riders who would use the Vancouver Max extension for less than a $1M per year ... 1/200 of the cost of extended light rail!
-> Light rail needs to be stand alone future project.

9) Bridge tolls are planned start before the actual bridge construction starts. It's not clear that the Glenn Jackson I-205 bridge will be tolled. The I-205 bridge tolling plan needs to in place when I-5 tolls start or a significant portion of the I-5 bridge traffic will move to the I-205 bridge. This will negatively impact the I-5 bridge toll collections and negatively impact I-205 bridge traffic, PDX airport traffic, and the PDX regional businesses which are very retail, and wholesale/freight oriented.

10) ODOT, PBT and our Legislators still have plans to toll I-5, I-205, Hwy 26, and Hwy 217 for “congestion relief”. More tolls will surely follow. The IBR tolling needs to be coordinated with the other regional tolling plans.

11) The IBR planners are allowing the general public and public officials to speak, but it is not clear they are hearing the concerns. There is no active feedback or interactive collaborative discussion.

-> But to ODOT's credit they do count every public comment as a "citizen contact" when their report their engagement numbers.

If my children only listened but did not hear, and certainly if they did not respond and interact when I provided feedback there would be consequences. IP-31 is a consequence of this behavior by Oregon transportation and legislative leadership. The day of reckoning will come on November 3rd, 2026.

IBR Draft SEIS - RECORD #3270 DETAIL

First Name :	Kevin
Last Name :	Neely
Attachments :	DSEIS-3270_Neely_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #3270 DETAIL

Submission Date :	11/18/2024
First Name :	Kevin
Last Name :	Neely
Business/Organization/Agency :	

Submission Input :

Ebikes and electric scotters are relatively new and gaining a lot of traction as their cost comes down. This adds a new dimension to the multi-use path in that there are at least three different speeds in each direction. In order for the project to create a safe path for pedestrians, cyclists, and personal motorized devices, the plan must incorporate an approach that can handle all three types simultaneously.

IBR Draft SEIS - RECORD #3271 DETAIL

First Name :	Christopher
Last Name :	Andersen
Attachments :	DSEIS-3271_Andersen_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #3271 DETAIL

Submission Date :	11/18/2024
First Name :	Christopher
Last Name :	Andersen
Business/Organization/Agency :	

Submission Input :

The cost to benefit ratio based on current ridership on mass transit in Vancouver and Portland do not support extension of light rail into Vancouver. There are also to many instances of people being assaulted, murdered or hit by MAX in Portland. As a Vancouver resident I do not support the light rail component of the IBR option(s).

IBR Draft SEIS - RECORD #3272 DETAIL

First Name :	E
Last Name :	Sutton
Attachments :	DSEIS-3272_Sutton_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #3272 DETAIL

Submission Date :	11/18/2024
First Name :	E
Last Name :	Sutton
Business/Organization/Agency :	

Submission Input :

This should be the last environmental impact statement for this project. Please just build it already. Give the next generation something.

IBR Draft SEIS - RECORD #3273 DETAIL

First Name :	Will
Last Name :	Hollingsworth
Attachments :	DSEIS-3273_Hollingsworth_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #3273 DETAIL

Submission Date :	11/18/2024
First Name :	Will
Last Name :	Hollingsworth
Business/Organization/Agency :	

Submission Input :

This project poorly serves the transportation needs of our communities, and particularly those of Portland. By its own modelling, the project will increase congestion between Marine Drive and the I405/I5 interchange. This seems to be drive in large part by freeway expansions far from the bridge itself, at E Mill Plain, 4th Plain, and SR-500 in Washington. The project should be re-scoped to remove freeway projects beyond the bridgehead at SR-14 in Washington, and the bridge should not be built with the expectation that those projects will be completed. Moreover, no freeway ingress or egress should be allowed on Hayden Island. The local bridge from the Island to Oregon should be maintained.

IBR Draft SEIS - RECORD #3274 DETAIL

First Name :	Amanda
Last Name :	Nicusor
Attachments :	DSEIS-3274_Nicusor_Original.pdf (4 kb)

IBR Draft SEIS - RECORD #3274 DETAIL

Submission Date :	11/18/2024
First Name :	Amanda
Last Name :	Nicusor
Business/Organization/Agency :	related to Jantzen Beach Moorage Inc

Submission Input :

To whom it may concern:

I don’t feel the plan adequately addresses the loss of floating homes. These are not just houses but our homes and community that have a unique cultural and historical background. Many of our residents are elderly and the rest of us plan to become elderly here but may not get that opportunity because of this project.
Some homes that the draft plan indicates will be taken you cannot relocate. There is no available moorage slips for purchase and there is nothing in the plan that indicates more moorage slips will be constructed or allowed. Some homes are in such a condition they cannot be moved. These residents stand to lose their homes and the river lifestyle completely. Due to the unique nature of moorage, surroundings, and culture, once these homes are lost they are lost for good.
The community as a whole will suffer the loss of infrastructure and a permanent loss of income for our non-profit organization causing an irreparable financial loss to all members and owners.
Our community will be heavily impacted by the project but there is no indication of what the IBR plans to use our property for. The IBR should state if our streets and parking lots will be used for trucks or material storage. Will fabrication or construction happen in these areas?
While the unspecified use is occurring there is no plan to provide alternative access to our properties in a manner that ensures resident safety, meets code, and does not restrict access to trucks or emergency vehicles. I am concerned that the construction use of our property will create security issues for our community. The moorage currently has restricted and gated access and the plan needs to ensure that our property and safety are not put at risk.
The plan indicates the easements may restrict access to Ramp 1. This ramp services a large portion of the moorage and will prevent residents from easily accessing their homes. Additionally, this is the most feasible ramp for motor scooter use or for disabled residents because of its grade. The IBR has no plan on how to ensure accessibility for the less abled residents throughout the entire moorage community.
There are no details on how the IBR plans to restore any property used during the construction process. Our parking lot and street have still not been restored to their original condition following the Portland Water Bureau main replacement project on N. Jantzen Avenue. I am concerned without a detailed commitment for restoration more of our property will be left damaged.
The maps show a temporary easement over the entire moorage except a section of the east end roughly rows A-F. Boundary of the partial easement area omits a significant portion of the east end of JBMI from the analysis.
It is unspecified what a temporary easement over all of our common and personal residences means. B Row residences are marked for a temporary construction impact but it is unclear what that means. Will the IBR be using the water or the homes? If the IBR plans to use the water area there is no indication of that only of the personal property.
The remainder of the community water rights are marked for a temporary easement but the water near the bridge there is none. This is a part of our community and will be most heavily impacted. Based on the map the IBR intends a temporary easement only the water far away from the bridge and temporarily occupy the

personal homes of B row residents but the surrounding water will not be impacted which defies logic.
It is necessary to visually inspect the area impacted. There are inaccuracies in the number of residential properties in the impacted areas.
The draft SEIS does not adequately address environmental concerns. As a community we are concerned about the environmental assessment of the water tower and diesel tanks located near the bridge. How will these be removed? What environmental remediation will be performed in these areas?
There is no information on how the wildlife will be impacted. We have blue herons, geese, ducks, beavers, otters, sea lions, salmon, and coyotes that live and hunt in this area. I did not see any analysis on the individual species that call N Portland Harbor and Hayden Island home. I would like to see a detailed study conducted on wildlife and habitat impacts and how they will be mitigated to ensure we preserve this amazing natural environment.
Humans will also experience negative impacts from construction. I live in a floating home near the bridge in the carved out area of the impact map. Even small wakes cause damage to our decks, boats, and docks and I am concerned about what damage will be caused to the foundation, floatation, and structure of my floating home and docks. I am concerned about damage from barge operation on our boats and other watercraft.
There is no information on what will be done to mitigate the structural and erosive effects of current change. Our docks will need to be structurally reinforced due to the loss of some rows. In order to change supports it is necessary to move the homes. It is unclear if the IBR has taken this impact into consideration and I would like to ensure this is adequately studied and reinforcements are made prior to construction start.
I understand the IBR proposes to conduct construction during the night. Being located very the bridge, night construction will cause vibration, light, and noise that will make our home uninhabitable as daytime workers. We would likely be forced to at least relocate during the period of construction if it is not possible to sleep in my home during the night.
More information is required on what air pollution impacts we will experience. Barges create pollution at water level that will permeate our homes. I would like the IBR to investigate and disclose the health impacts of reduced air quality.
The bridge moving closer to our homes will permanently increase the noise level from the highway, local roads, and light rail which will negatively impact our property value.
Many of our residents, including myself, are concerned about restricted waterway access. It should be more clear how much of the water will be restricted around the work area for boating, recreation, fishing, and swimming. It should also be specified how long the waterway access will be restricted. To note there is no fueling station on the west side of the I5 bridge.
Overall there are a lot of uncertainties from lack of study or analysis. There are inaccuracies in the analysis that need correction. Finally, there is a long and rich history tied to Jantzen Beach Moorage and impacts should be eliminated in order to preserve this uniquely historical and irreplicable way of living. I would like to request that the IBR address the insufficiencies in the DRAFT SEIS noted in this letter and perform adequate research and study before proceeding.

IBR Draft SEIS - RECORD #3275 DETAIL

First Name :	Mihai
Last Name :	Nicusor
Attachments :	DSEIS-3275_Nicusor_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #3275 DETAIL

Submission Date :	11/18/2024
First Name :	Mihai
Last Name :	Nicusor
Business/Organization/Agency :	

Submission Input :

The IBR wants to do construction at night. I work 6 days a week during the day. I will not be able to sleep in my house while this is going on.

IBR Draft SEIS - RECORD #3276 DETAIL

First Name :	Josh
Last Name :	Berezin
Attachments :	DSEIS-3276_Berezin_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #3276 DETAIL

Submission Date : 11/18/2024
First Name : Josh
Last Name : Berezin
Business/Organization/Agency :

Submission Input :

This project is so harmful, ill-conceived and out of proportion.

Can we experiment first? We all know the traffic modeling is unreliable. What if we start with tolls and see what their effect is? There’s so much to learn about how people respond and shift their habits. You’re going to destroy so much to build a bridge that we just can’t be certain we need.

Thank you for reading my comment.

IBR Draft SEIS - RECORD #3277 DETAIL

First Name :	Kathleen
Last Name :	Korengel
Attachments :	DSEIS-3277_Korengel_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #3277 DETAIL

Submission Date : 11/18/2024
First Name : Kathleen
Last Name : Korengel
Business/Organization/Agency :

Submission Input :

I live in Vancouver and have commuted to Portland to work for years across the I-5 bridge. With traffic, my commute takes twice as long as it normally would. More than anything, the number of lanes for passenger cars needs to be expanded to at least 4 lanes each way.
I personally support a light-rail lane, shared pathway and shoulder lane for buses, but I suspect than many people in Vancouver do not. I would rather not have to pay a toll to cross it either.
So, if opposition to any of the improvements for light-rail, a shoulder lane for buses or a shared pathway or tolls would keep this project from happening, I think they should be dropped.
Mainly, people just want to get across the bridge in a more efficient manner and pay as little as possible for it. That's a reasonable request I think.
Of course, I totally support replacing the bridge for safety concerns and earthquake updates.

IBR Draft SEIS - RECORD #3278 DETAIL

First Name :	Diana
Last Name :	Ruiz
Attachments :	DSEIS-3278_Ruiz_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #3278 DETAIL

Submission Date : 11/18/2024

First Name : Diana

Last Name : Ruiz

Business/Organization/Agency :

Submission Input :

I am very excited about the possibility of a new, better bridge that is so much needed. Although I understand this is a huge project, it concerns me when it comes to having to pay toll fees. We work in Portland and live in Vancouver. We travel more than 5 times a week using I-5. Having another expense to the already high insurance prices, gas, etc, makes me think about my personal finances vs convenience. Having to pay fees for 2 drivers, possibility 3, it will hit hard in our pockets. Hopefully, there will be household discounts.

IBR Draft SEIS - RECORD #3279 DETAIL

First Name :	Barbara
Last Name :	Payne
Attachments :	DSEIS-3279_Payne_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #3279 DETAIL

Submission Date :	11/18/2024
First Name :	Barbara
Last Name :	Payne
Business/Organization/Agency :	

Submission Input :

[-city commission should offer incentives for new businesses to move to a Hayden location during construction.
-county commission should offer tax abatements for businesses who would move to Hayden.
-special commuter considerations for residents during construction and/or tolls.
-requirement to construct more greenspace/ park areas for residents.
-freeze on property tax assessments during construction.
-increase police presence during construction.

IBR Draft SEIS - RECORD #3280 DETAIL

First Name :	Ian
Last Name :	Shaughnessy
Attachments :	DSEIS-3280_Shaughnessey_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #3280 DETAIL

Submission Date :	11/18/2024
First Name :	Ian
Last Name :	Shaughnessy
Business/Organization/Agency :	

Submission Input :

This project is already over budget and not what we need. I firmly oppose this, and will vote to remove any funding this project has. Instead, we should retrofit the existing bridge to be earthquake safe, and add a smaller bridge to Hayden Island only. Or even explore a floating tunnel. But this bridge is a boondoggle, an inferno of money, and it will destroy downtown Vancouver, Hayden Island, and set us back years.

IBR Draft SEIS - RECORD #3281 DETAIL

First Name :	Diana
Last Name :	Ruiz
Attachments :	DSEIS-3281_Ruiz_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #3281 DETAIL

Submission Date : 11/18/2024

First Name : Diana

Last Name : Ruiz

Business/Organization/Agency :

Submission Input :

I am very excited about the possibility of a new, better bridge that is so much needed. Although I understand this is a huge project, it concerns me when it comes to having to pay toll fees. We work in Portland and live in Vancouver. We travel more than 5 times a week using I-5. Having another expense to the already high insurance prices, gas, etc, makes me think about my personal finances vs convenience. Having to pay fees for 2 drivers, possibility 3, it will hit hard in our pockets. Hopefully, there will be household discounts.

IBR Draft SEIS - RECORD #3282 DETAIL

First Name :	Jared
Last Name :	Wright
Attachments :	DSEIS-3282_Wright_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #3282 DETAIL

Submission Date :	11/18/2024
First Name :	Jared
Last Name :	Wright
Business/Organization/Agency :	

Submission Input :

I support "Alternative 5". Large ships should still be able to travel beyond the I-5. Also, I do not want a giant concrete bridge and interstate highway over the top of Vancouver. I've been to Oakland California, and it is awful that they have giant concrete freeways over and cutting up the communities.

IBR Draft SEIS - RECORD #3283 DETAIL

First Name :	Jesse
Last Name :	Fairbank
Attachments :	DSEIS-3283_Fairbank_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #3283 DETAIL

Submission Date :	11/18/2024
First Name :	Jesse
Last Name :	Fairbank
Business/Organization/Agency :	

Submission Input :

We need a right-sized I-5 bridge replacement. That means one that matches the facts that car and freight traffic are leveling off, and matches the regional climate-change goals of reducing motor vehicle traffic. Adding lanes won’t help in this regard, and only adds to the cost of the project.

We want a new bridge with seismic and structural upgrades, plus transit/light rail/bicycle/pedestrian upgrades. We also need to stop the fallacy of constantly expanding our road network for motor vehicles. Induced demand is very real, and isn’t the vision for a happier and healthier future shared by regional residents, myself included. Thank you for doing the right thing for our community, our children, and our planet!

IBR Draft SEIS - RECORD #3284 DETAIL

First Name :	Louise
Last Name :	Lopes
Attachments :	DSEIS-3284_Lopes_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #3284 DETAIL

Submission Date :	11/18/2024
First Name :	Louise
Last Name :	Lopes
Business/Organization/Agency :	

Submission Input :

While the bridge is needed due to increasing traffic volume, it is imperative that every possible precaution be taken to lessen the impact on ALL wildlife - in the water, the air and on the land. This includes also a lessening of impact to plant life, air quality and the environment.

IBR Draft SEIS - RECORD #3285 DETAIL

First Name :	Adriana
Last Name :	Britton
Attachments :	DSEIS-3285_Britton_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #3285 DETAIL

Submission Date :	11/18/2024
First Name :	Adriana
Last Name :	Britton
Business/Organization/Agency :	

Submission Input :

I support a bridge project that prioritizes high quality, fast transit and amenities to reduce congestion and provide cost-effective transportation across the communities. I prefer a bridge that can be raised or increase the height of the other bridge options. A double-decker seems more expensive and would be unnecessary if transit, bike/walk modes are made safe, efficient and more pleasant than the current experience. We know the climate is changing but the known changes are not incorporated adequately in the IBR DSEIS. Both rivers are being pressured by droughts and commercial interests. Rains are also falling heavily in short periods causing extreme flooding. The wetlands should be expanded to hold the increased water from extreme rains from atmospheric rivers and bomb cyclones. Plus, as drinking water becomes scarce, the wetlands will improve water quality. The FAA should also review the impacts of the multiple airfields in our region. Pearson Airfield's location should not be a deciding in the bridge's height. The mitigation treatments reasonably improve the visibility of the bridge. Thank you for your thorough work!

IBR Draft SEIS - RECORD #3286 DETAIL

First Name :	Jan
Last Name :	Snyder
Attachments :	DSEIS-3286_Snyder_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #3286 DETAIL

Submission Date : 11/18/2024

First Name : Jan

Last Name : Snyder

Business/Organization/Agency :

Submission Input :

As I continue to reflect on the public comment period now closing, I find it difficult to truly comment on something with so much undetermined. Where I live will undoubtedly be impacted, but I have no way of knowing how, or if it will be a negative impact. With that said, I have more of a question than a comment. Since the design is yet to be determined, what recourse will I and my neighbors have if our property is negatively impacted ? I am concerned about the value of my property being reduced due to things such as increased noise and vibration or loss of views or other factors unknown at this point.

IBR Draft SEIS - RECORD #3287 DETAIL

First Name :	Michael
Last Name :	Kilger
Attachments :	DSEIS-3287_Kilger_Original.pdf (2 kb)

IBR Draft SEIS - RECORD #3287 DETAIL

Submission Date :	11/18/2024
First Name :	Michael
Last Name :	Kilger
Business/Organization/Agency :	Oregon citizen

Submission Input :

The proposed replace of the Interstate Bridge should not include light rail, should have more lanes than the existing bridge and should be less expensive and should not have open ended tolling.

Light rail is an expensive, inflexible mode of transport that limits design options for the bridge. Light rail is very expensive compared to just adding busses to transport people across the bridge from downtown Vancouver to downtown Portland or other regional stops. Busses are very flexible in that they can adjust to ridership number and can provide direct routes from one destination in Clark County to another in Oregon to minimize time spend in-route. Additionally, light rail limits the design of the bridge due to the ability of light rail to climb on rails. Trimet reached their maximum ridership in FY2012 and have been losing riders since then even though the population in the Portland Metro area has increased by 17% in that time. The original bridge replacement was stopped because the citizens of Clark County vehemently did not want light rail. The people are voting with the feet for the transportation that meets their needs and it isn't public.

The proposed bridge has the same number of lanes, 3 in each direction, as the current bridge. The Statement of Purpose and need indicated that the bridge traffic is expected to increase by 35% in the next 20 years and freight traffic is expected to double in 25 years. If the 3 lanes are clogged now, what is gained? No including a 4th lane is very expensive wishful thinking and puts us back where we are. This bridge is to get the region through the next 100 years but we aren't adding lanes. Please explain how this will work?

As to expense, keep it simple. The primary reason for this bridge is to add more capacity and provide a seismically stable structure in case of an earthquake. Stick to the basics and build it for the minimal cost.

The need for minimal cost is because there isn't enough money to go around for all the desired transportation projects. Tolling is proposed to resolve the funding issue but I don't see anywhere where it is limited in scope or time. Tolling should only be considered if it is used to provide a minimum cost bridge with no light rail and only used to pay for bonds dedicated to the bridge project with an end date where tolling ceases to exist because the bonds are paid off. We need a Corolla to solve a basic transportation project, not a high end sport utility vehicle that cost 3x the Corolla.

IBR Draft SEIS - RECORD #3288 DETAIL

First Name :	William C
Last Name :	Danielson
Attachments :	DSEIS-3288_Danielson_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #3288 DETAIL

Submission Date : 11/18/2024

First Name : William C

Last Name : Danielson

Business/Organization/Agency :

Submission Input :

The IBRP proposal is not what the Washingtonians, Oregonians and all other Americans that DRIVE the I5 Columbia River bridge want! What we do want is for the current I5 drawbridge (as bridges go OUR bridge is far younger than the Brooklyn Bridge) to be left alone to stand as is, in favor of building the "Third Bridge Now" proposal adjacent to the railroad bridge downstream 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. The footprint consumes millions of square feet of TRUELY GORGEOUS REAL ESTATE and TURNS it into CONCRETE. It will however bring a Tsunami Wave of CRIME and DRUGS to Vancouver and Hayden Island. In plain words, we do not want light rail! It is ineffective in its purpose, promotes CRIME and DRUGS, and is NINTY NINE PERCENT wasteful in its unquenchable consumption of TAXPAYER DOLLARS. IBRP is a $Seven Billion Dollar Boondoggle of Obsolete Waste Prior to it Even Breaking Ground.

IBR Draft SEIS - RECORD #3289 DETAIL

First Name :	Lymn
Last Name :	Miller
Attachments :	DSEIS-3289_Miller_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #3289 DETAIL

Submission Date : 11/18/2024

First Name : Lymn

Last Name : Miller

Business/Organization/Agency :

Submission Input :

It’s my understanding that Clark county has voted this down numerous times. I’m not sure why it continues to be a source of contention in getting a approval for a new I five bridge over the Columbia river. This is a main thorough fair for businesses and quite frankly the entire West Coast.. Light rail should not continue to be an issue in Regards to the bridge. And until we make our community safer, people are not wanting to use light rail due to increased violence, homelessness, and potential for it being a tool to transport human trafficking.. everyone I know in this community would not be using light rail ever. Maybe you should take a poll on how many people in Clark County would be using it to get to work or other personal needs in Portland. Vancouver is building quite a large community of restaurants, shops, businesses, etc. there isn’t such a need to go down to a disastrous Portland area and it’s surrounding metropolitan communities. I’m not saying Clark County is perfect by any means as we continue to get an increase in homelessness and other criminal activity but a light rail would just add to it. I don’t see this as a benefit compared to the cost. It would be to our communities.

IBR Draft SEIS - RECORD #3290 DETAIL

First Name :	Amy
Last Name :	Singmaster
Attachments :	DSEIS-3290_Singmaster_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #3290 DETAIL

Submission Date :	11/18/2024
First Name :	Amy
Last Name :	Singmaster
Business/Organization/Agency :	

Submission Input :

Light rail is a dated technology and should be replaced with Bus Rapid Transit, which is cheaper, more flexible, easier to change, and eliminates conflict with other airspace and water users. We ride Vancouver's Vine often and love it. I no longer ride the Max and only ride buses on Trimet's system, because of a lack of feeling of safety. Bike access is great, but again safety concerns in Delta Park and the Columbia Slough on the Oregon side are discouraging.

IBR Draft SEIS - RECORD #3291 DETAIL

First Name :	Rachell
Last Name :	Oberst
Attachments :	DSEIS-3291_Oberst_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #3291 DETAIL

Submission Date :	11/18/2024
First Name :	Rachell
Last Name :	Oberst
Business/Organization/Agency :	

Submission Input :

IBR,

Saving time and reducing traffic congestion is the people's #1 priority in Washington and Oregon but you have nothing in your plan to benefit us. We do not want more public transportation or your light rail. As you know from your numbers there is no one riding it right now. Washington turned down the light rail so you made a plan to go around what the people wanted but it's us who pay for you and the roads. We do not want to pay for your 19 new light rail buses for the 2 mile addition We do not want your forever toll roads on our freeway. We want more lanes, more bridges and less time sitting in traffic. With the size of these 2 cities we should already have 4 bridges going between us but we don't and now you want to rebuild one that is already structurally sound and then add tolls to it too. There is not even any common sense in what is being discussed.

IBR Draft SEIS - RECORD #3292 DETAIL

First Name :	Linda
Last Name :	Burright
Attachments :	133146_DSEIS3292_Burright_Original_Redacted.pdf (1 mb)

IBR Draft SEIS - RECORD #3292 DETAIL

Submission Date :	11/19/2024
First Name :	Linda
Last Name :	Burright
Business/Organization/Agency :	
Attachments :	BNA Comment Water Access Point.pdf (2 mb)

Submission Input :

Comment submitted to the Interstate Bridge Replacement Draft SEIS

By Linda and Brian Burright

[redacted]
[redacted]

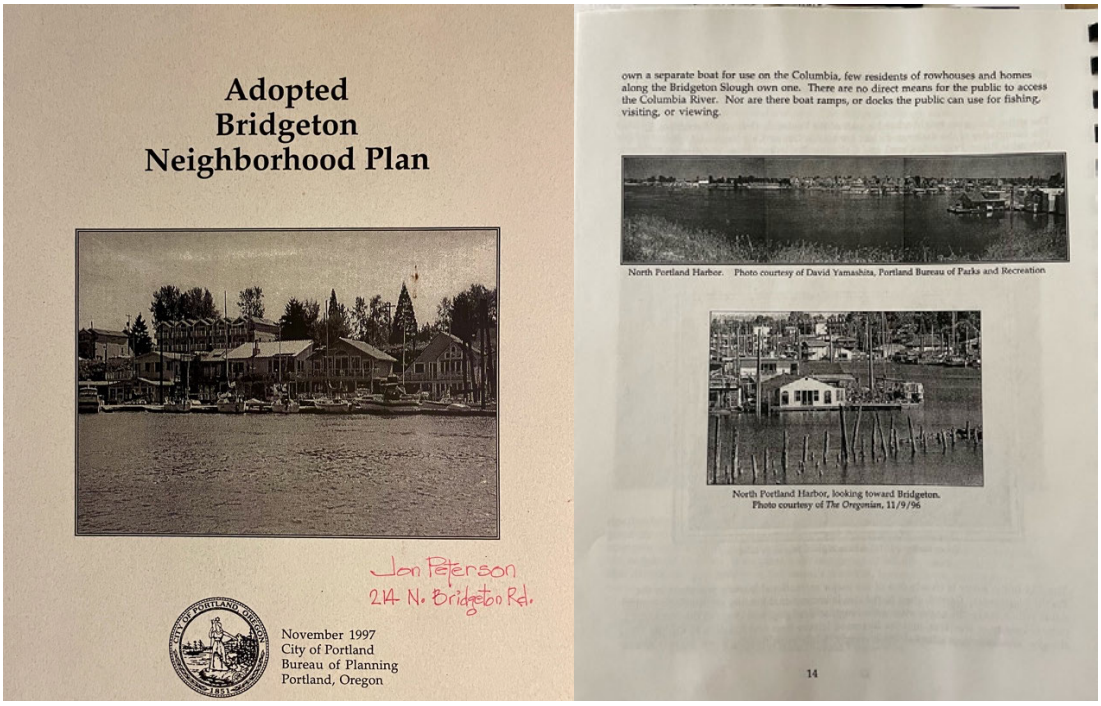
12 November 2024

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

IBR Draft SEIS - RECORD #3294 DETAIL

First Name :	Gary
Last Name :	Clark
Attachments :	DSEIS-3294_Clark_Original_Redacted.pdf (5 kb) Say-No-to-the-IBRP-2.jpg (424 kb)

IBR Draft SEIS - RECORD #3294 DETAIL

Submission Date :	11/18/2024
First Name :	Gary
Last Name :	Clark
Business/Organization/Agency :	Electronic Security Consultants, LLC

Submission Input :

First Name:
Gary

Last Name:
Clark

Business or Organization:
[redacted]

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
I'm against the IBRP bridge designs! The 175 ft bridge height will be an eyesore that will detract from the

current scenic beauty of the crossing, and IBRP'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. Stop this B.S. Now!!

Attachment (maximum one):
Say-No-to-the-IBRP-2.jpg

JCA comment #: 938

IBR Draft SEIS - RECORD #3296 DETAIL

First Name :	Clare
Last Name :	Baxter
Attachments :	DSEIS-3296_Baxter_Original_Redacted.pdf (189 kb)

IBR Draft SEIS - RECORD #3296 DETAIL

Submission Date :	11/19/2024
First Name :	Clare
Last Name :	Baxter
Business/Organization/Agency :	
Attachments :	Marine Drive Bike Lanes 40.pdf (194 kb)

Submission Input :

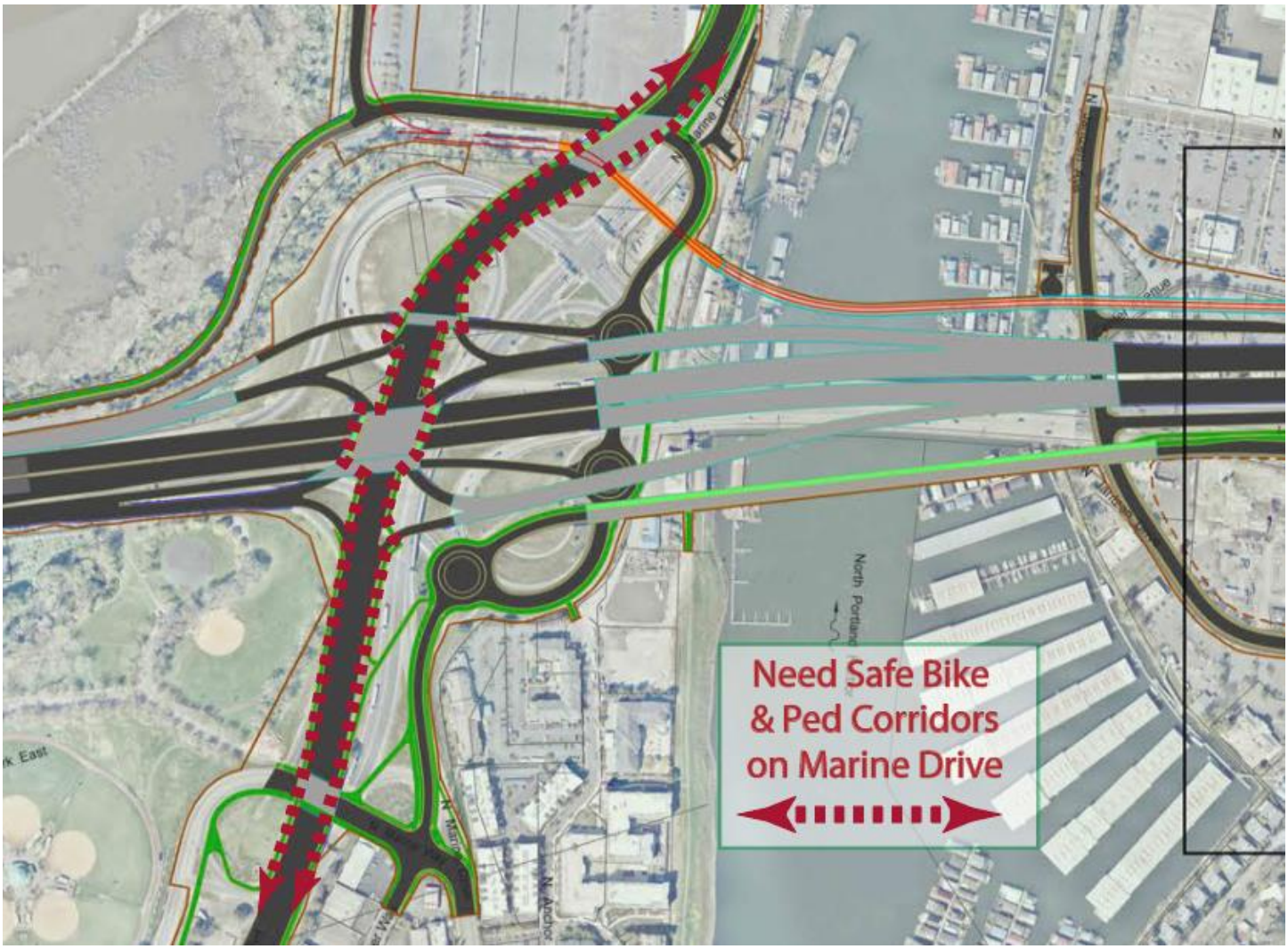
Draft SEIS public comment - Marine Drive Bike Lanes

Clare Baxter
[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
Clare Baxter
[redacted]

IBR Draft SEIS - RECORD #3297 DETAIL

First Name :	Jane
Last Name :	Wimmer
Attachments :	DSEIS-3297_Wimmer_Original_Redacted.pdf (5 kb) STOP-IBR-I-5-BRIDGE-Replacement-1.jpg (424 kb)

IBR Draft SEIS - RECORD #3297 DETAIL

Submission Date : 11/18/2024
First Name : Jane
Last Name : Wimmer
Business/Organization/Agency :

Submission Input :

First Name:
Jane

Last Name:
Wimmer

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
I am for a bridge replacement, but not the costly and outdated IBRP designs. This committee WAY UNDERESTIMATED the growth (population, traffic, businesses, etc.) in the Portland, OR and Vancouver, WA communities. The current design will not begin to lighten our traffic patterns and perhaps make them worse. The design is not economical, extremely costly and environmentally unsound. An underground/water tunnel would be considerably less expensive, accommodate future growth more easily, and be a better choice when considering environmental impact.

I live on Hayden Island. 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. As far as I have been informed (the committee does seem to prefer to withhold important information), there doesn't appear to be any impact study from the IBR committee on the bridge replacement as to how much damage it will do to the island (environmentally or otherwise), the businesses on the island (total destruction and/or projected sales reduction), or the individual residences (a likely loss in property values). The projected tolls alone to come and go off the island will be an enormous burden to any and all persons involved on the island.
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. This is unacceptable. I don't think the project can withstand a total island buyout.

Attachment (maximum one):
STOP-IBR-I-5-BRIDGE-Replacement-1.jpg

JCA comment #: 936

IBR Draft SEIS - RECORD #3298 DETAIL

First Name :	Clare
Last Name :	Baxter
Attachments :	DSEIS-3298_Baxter_Original_Redacted.pdf (361 kb)

IBR Draft SEIS - RECORD #3298 DETAIL

Submission Date :	11/19/2024
First Name :	Clare
Last Name :	Baxter
Business/Organization/Agency :	
Attachments :	MLK Undercrossing 40.pdf (368 kb)

Submission Input :

MLK Under crossing etc...

Clare Baxter
[redacted]

?

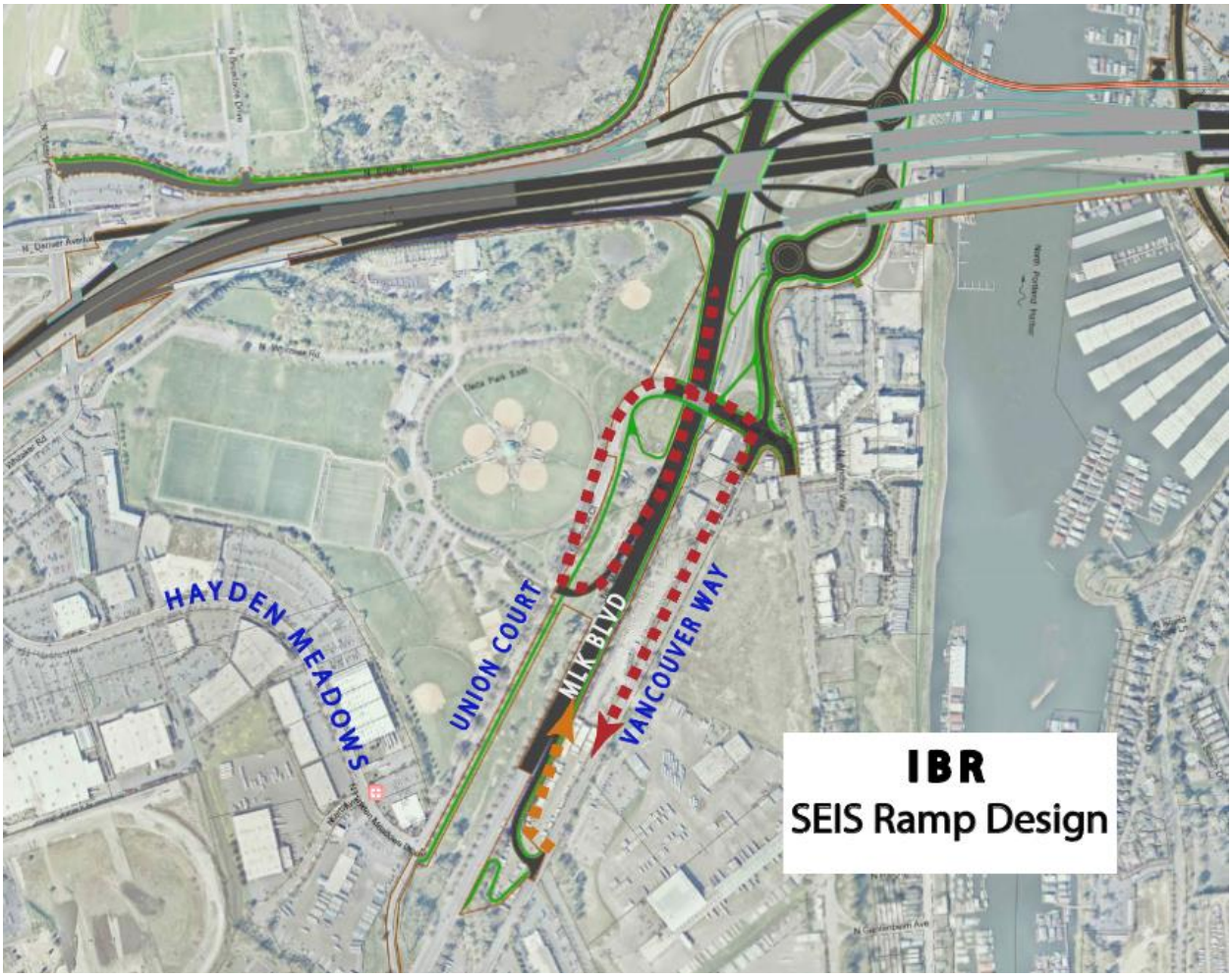
The MLK Undercrossing and Complete Interchange
Better Freight & Neighborhood Access Ramps for the IBR

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
Clare Baxter
[redacted]

IBR Draft SEIS - RECORD #3299 DETAIL

First Name :	Clare
Last Name :	Baxter
Attachments :	DSEIS-3299_Baxter_Original.pdf (216 kb)

IBR Draft SEIS - RECORD #3299 DETAIL

Submission Date :	11/19/2024
First Name :	Clare
Last Name :	Baxter
Business/Organization/Agency :	
Attachments :	DSEIS-3299_Baxter_Original.pdf (222 kb)

Submission Input :

Draft SEIS public comment - Synergies Empowered by the IBR

Clare Baxter
Production Management
[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
Clare Baxter
[redacted]

IBR Draft SEIS - RECORD #3300 DETAIL

First Name :	Clare
Last Name :	Baxter
Attachments :	DSEIS-3300_Baxter_Original.pdf (409 kb)

IBR Draft SEIS - RECORD #3300 DETAIL

Submission Date :	11/19/2024
First Name :	Clare
Last Name :	Baxter
Business/Organization/Agency :	
Attachments :	Separating Freight & Bike Travel 40.pdf (408 kb)

Submission Input :

Draft SEIS public comment - Freight and Bike traffic

[redacted]
Production Management
[redacted]

?

Separating Freight and Bike Travel
on the Marine Drive Interchange and On-Ramps

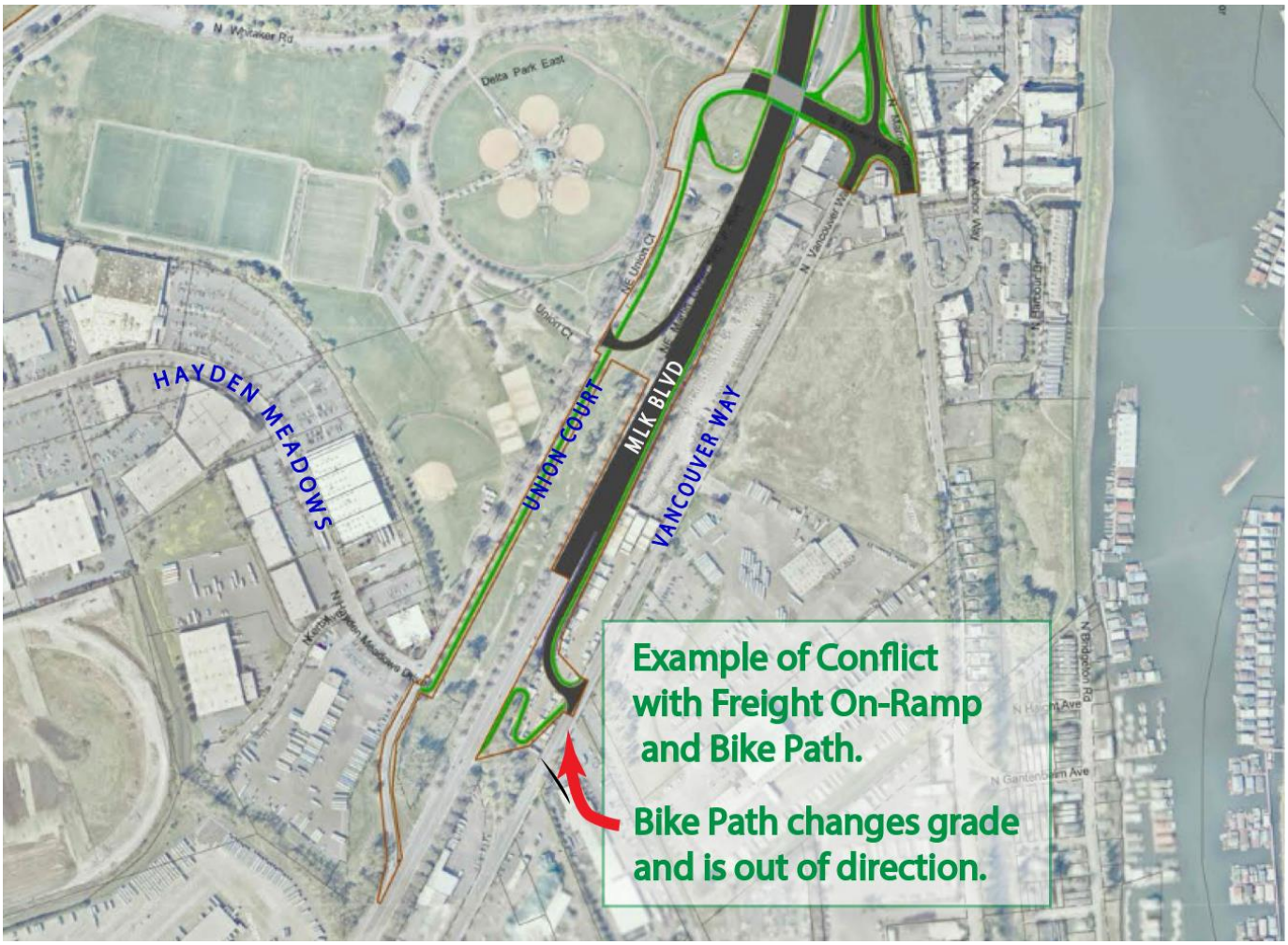
One important purpose and need of the IBR is to (c) improve highway freight mobility and address interstate travel and commerce needs in the Program area.

Another important purpose and need is to (b) improve connectivity, reliability, travel times, and operations of public transportation modal alternatives in the Program area.

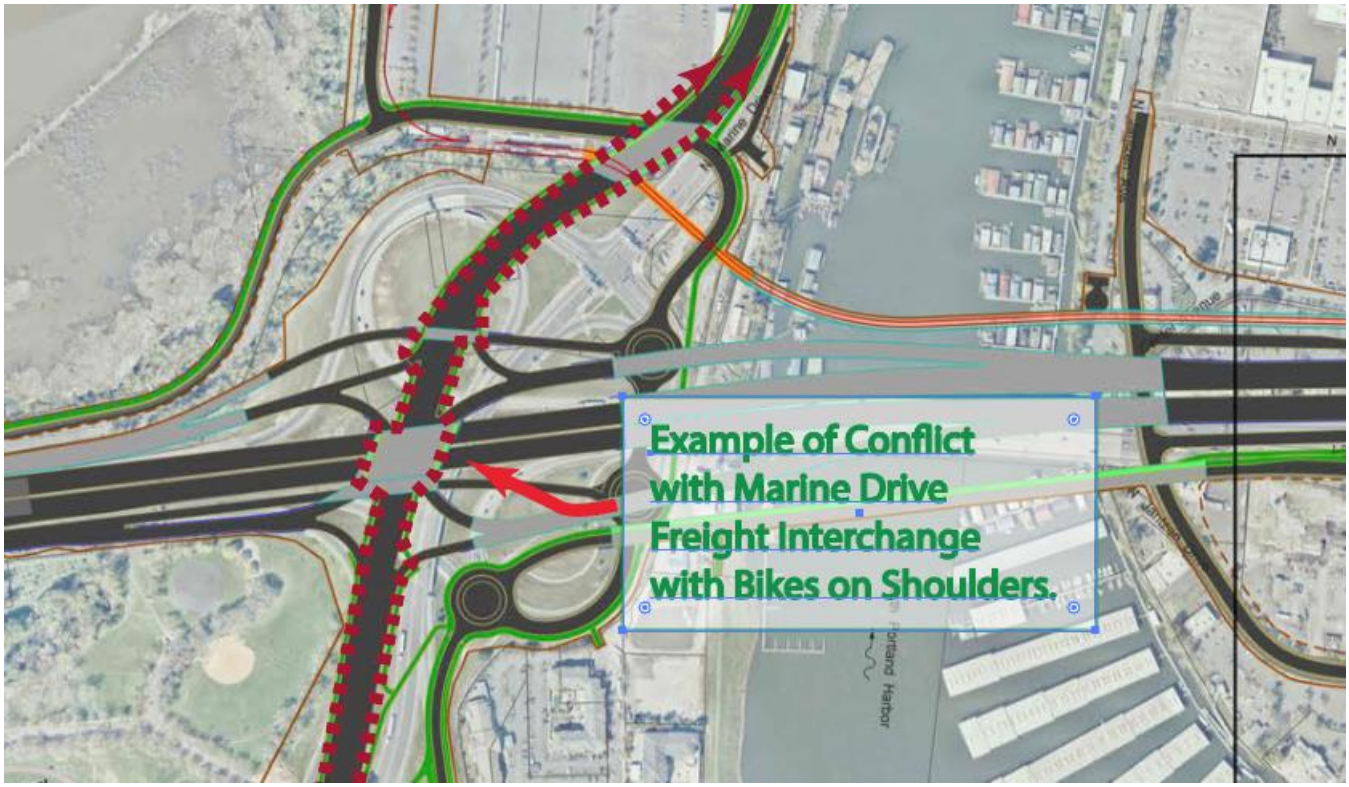
A way to meet the purpose and needs of both Freight Users and Active Transportation Users is to build active transportation routes physically separated from Freight routes as much as possible. Maximizing this separation is key to creating efficient Freight routes while creating safer, more attractive, 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
Clare Baxter
baxter.clare@icloud.com

IBR Draft SEIS - RECORD #3302 DETAIL

First Name :	JOSEPH
Last Name :	HENDERSON
Attachments :	DSEIS-3302_Henderson_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #3302 DETAIL

Submission Date :	11/18/2024
First Name :	JOSEPH
Last Name :	HENDERSON
Business/Organization/Agency :	SHEKINAH MARKETING DBA: Swag Doctors

Submission Input :

NO! JUST NO! TAXATION WITHOUT REPRESENTATION IS UNCONSTITUTIONAL!!! PUT THIS TO A VOTE OF THE PEOPLE. ANYTHING SHORT OF THAT IS AN ABUSE OF POWER...NO MORE RAILROADING PROJECTS DOWN THE THROATS OF THE PUBLIC WITHOUT A VOTE! VOTE, VOTE, VOTE!!!

IBR Draft SEIS - RECORD #3303 DETAIL

First Name :	Megan
Last Name :	Fairbank
Attachments :	DSEIS-3303_Fairbank_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #3303 DETAIL

Submission Date :	11/18/2024
First Name :	Megan
Last Name :	Fairbank
Business/Organization/Agency :	

Submission Input :

Please prioritize non-personal vehicle users. I’m particularly interested in transit options and a safe, relatively pleasant passage for pedestrians and bicycles. Thank you!

IBR Draft SEIS - RECORD #3304 DETAIL

First Name :	Megan
Last Name :	Newell
Attachments :	DSEIS-3304_Newell_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #3304 DETAIL

Submission Date :	11/18/2024
First Name :	Megan
Last Name :	Newell
Business/Organization/Agency :	

Submission Input :

The IBR needs to consider long term goals and capacity building for public transportation: stations should support four-car trains for future downtown tunnel upgrades and plan for higher-capacity systems such as rapid transit. Please plan for the future: the bridge needs to be able to adapt to our future infrastructure needs, and not all of those needs will be single occupancy vehicle-centric.

IBR Draft SEIS - RECORD #3305 DETAIL

First Name :	Sam
Last Name :	LoBue
Attachments :	DSEIS-3305_LoBue_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #3305 DETAIL

Submission Date :	11/18/2024
First Name :	Sam
Last Name :	LoBue
Business/Organization/Agency :	

Submission Input :

I prefer Modified LPA with Double-Deck Fixed-Span Configuration because it will restore wetlands and offers less visual obstruction when crossing the river. I also prefer the options that has the most walkability/biking options to cross the river alongside cars. I think there should be a design that allows a rail as well when the two areas are connected, so an entirely new bridge does not have to be built. Lastly, I prefer the least amount of environmental impact to existing marine life and wildlife.

IBR Draft SEIS - RECORD #3306 DETAIL

First Name :	Kerry
Last Name :	Aszklar
Attachments :	DSEIS-3306_Aszklar_Original.pdf (2 kb)

IBR Draft SEIS - RECORD #3306 DETAIL

Submission Date : 11/18/2024
First Name : Kerry
Last Name : Aszklar
Business/Organization/Agency :

Submission Input :

I do not support this project because it is too expensive and does not support the region's mobility values. I am concerned about the numerous adverse effects this project will have on the local community, the Cities of Vancouver and Portland, and on the region.

Please reconsider the impacts of this project to support robust improvements to lite rail, buses, tolling, walking, and bicycling. Thank you.

Project Overall
- This $7 billion project is way too expensive without considering more cost-effective solutions, such as a combination of tolling and transit
- This project's transportation modeling is based on pre-COVID 19 volumes.

Tolling
- This project needs to study tolling more. The Draft SEIS doesn't include research on the impacts of tolling on bridge volumes.
- Also, it is possible to create and implement an equitable tolling program. This project needs to give more consideration about how to support transportation-burdened communities. A wider highway as an "equity solution" is an outdated solution.

Walking and Bicycling
- The active transportation connections are bad. The shared use path in the proposed modified LPA has a significant grade increase compared to today's bridge, which would deter many people from using it as a commute option to Portland.
- The Draft SEIS did not provide clear information on the impacts to walking and bicycling in the area. Grade is a huge factor for a person in a wheel chair or on a bike.

Transit
- The current MAX connection ends on Hayden Island and should extend to Vancouver
- Also, the transit "improvements" will be outdated considering the other transit projects planned for the region.
- This project should plan for stronger multi-lane Bus Rapid Transit (BRT) or heavy rail infrastructure across this bridge.

IBR Draft SEIS - RECORD #3307 DETAIL

First Name :	Megan
Last Name :	Newell
Attachments :	DSEIS-3307_Newell_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #3307 DETAIL

Submission Date :	11/18/2024
First Name :	Megan
Last Name :	Newell
Business/Organization/Agency :	

Submission Input :

The bridge shouldn't be focused only on freeway expansion – by creating a more streamlined focus and REPLACING the bridge and not EXPANDING IT, plus with additional enhancement to public and active transportation infrastructure, the overall project will be more beneficial and cost effective.

IBR Draft SEIS - RECORD #3308 DETAIL

First Name :	Megan
Last Name :	Newell
Attachments :	DSEIS-3308_Newell_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #3308 DETAIL

Submission Date :	11/18/2024
First Name :	Megan
Last Name :	Newell
Business/Organization/Agency :	

Submission Input :

We need a new, more realistic Supplemental Environmental Impact Statement (DSEIS) because the current traffic modeling issues mean that the health impact assessments are unreliable. Not to mention there are already increased health concerns to priority populations because of the increase in traffic. Please REDO the DSEIS.

IBR Draft SEIS - RECORD #3309 DETAIL

First Name :	Kim
Last Name :	Daline
Attachments :	DSEIS-3309_Daline_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #3309 DETAIL

Submission Date : 11/18/2024

First Name : Kim

Last Name : Daline

Business/Organization/Agency :

Submission Input :

I can’t tell if my comments went through. It would be nice to know if they were received.
If anything I can re add, it would be extending this time of public hearing for another 2 months.
Let’s get this right!
And, NO “ leave my house tax”!!!! (Tolls)

IBR Draft SEIS - RECORD #3310 DETAIL

First Name :	Megan
Last Name :	Newell
Attachments :	DSEIS-3310_Newell_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #3310 DETAIL

Submission Date : 11/18/2024
First Name : Megan
Last Name : Newell
Business/Organization/Agency :

Submission Input :

Tolling causes financial burdens on low income, vulnerable communities. Prioritize equity in tolling and implement a low-income toll discount program from the first day of pre-completion tolling.

We need equitable solutions for tolling as well as noise concerns that affect marginalized communities. Please find equitable solutions for those.

IBR Draft SEIS - RECORD #3311 DETAIL

First Name :	Jeff
Last Name :	PAYNE
Attachments :	DSEIS-3311_Payne_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #3311 DETAIL

Submission Date :	11/18/2024
First Name :	Jeff
Last Name :	PAYNE
Business/Organization/Agency :	

Submission Input :

Why waste money on a bridge that hasn't met clearance requirements from the Coast Guard yet. Why don't you direct the future money to a beltway/bypass that would relieve traffic from the central city and drop it off beyond Wilsonville. Tolls are a tax and a way of circumventing the proper channels to approve such taxation. Tolls wouldn't be used as intended as with most all government schemes.

IBR Draft SEIS - RECORD #3312 DETAIL

First Name :	Malcolm
Last Name :	Lewis
Attachments :	DSEIS-3312_Lewis_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #3312 DETAIL

Submission Date :	11/18/2024
First Name :	Malcolm
Last Name :	Lewis
Business/Organization/Agency :	

Submission Input :

The price of the I-205 Abernethy Bridge has tripled to $750 million; the price of the I-5 Rose Quarter project has quadrupled to $1.9 billion. And the financial tools that ODOT says it uses to control costs, grandly called .the “Cost Estimate Validation Process” (CEVP) do nothing. The voters of Vancouver have twice voted down the train. People do not want bridge tolls. End the proposal of fleecing the taxpayer

IBR Draft SEIS - RECORD #3313 DETAIL

First Name :	Kelly
Last Name :	Hagerman
Attachments :	DSEIS-3313_Hagerman_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #3313 DETAIL

Submission Date : 11/18/2024
First Name : Kelly
Last Name : Hagerman
Business/Organization/Agency :

Submission Input :

I love that we will have light rail transit from Vancouver to Portland!! This will open up so many options for individuals who cannot or choose not to use vehicles.
Please consider changing the pedestrian/cyclist entry/exit to the bridge on the Vancouver side so that it is more smooth than one large spiral ramp. As is, this would be a large inconvenience to cycle UP and potentially dangerous to cycle DOWN.
Additionally, please consider an alternative access option for the Waterfront Station (transit) in addition to elevator. Elevators are unreliable and it would be good to have stairs as a back up.
Thank you for your consideration!

IBR Draft SEIS - RECORD #3314 DETAIL

First Name :	Megan
Last Name :	Newell
Attachments :	DSEIS-3314_Newell_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #3314 DETAIL

Submission Date : 11/18/2024
First Name : Megan
Last Name : Newell
Business/Organization/Agency :

Submission Input :

Please design multi-use paths and transit next to each other – this makes it much more accessible, easier transfers, and ease of use.

Please buffer transit lanes between multi-use paths and vehicle lanes to help reduce noise and debris and increase safety.

We need better connections – For Vancouver extend the path to Evergreen so we don't need to use a 100 foot tall spiral. For Portland, add connections to Vancouver/Williams along with the Kenton/Denver Ave. link, as the Vancouver/Williams corridor is popular.

IBR Draft SEIS - RECORD #3315 DETAIL

First Name :	Gina
Last Name :	Capri
Attachments :	DSEIS-3315_Capri_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #3315 DETAIL

Submission Date :	11/18/2024
First Name :	Gina
Last Name :	Capri
Business/Organization/Agency :	

Submission Input :

I would like to request that tolling not be a source of funding for this project. Thank you.

IBR Draft SEIS - RECORD #3316 DETAIL

First Name :	THOMAS
Last Name :	KARWAKI
Attachments :	DSEIS-3316_KARWAKI_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #3316 DETAIL

Submission Date :	11/18/2024
First Name :	THOMAS
Last Name :	KARWAKI
Business/Organization/Agency :	University Park Neighborhood Association

Submission Input :

The Board of Directors of the University Park Neighborhood Association feels that the current designs create barriers to access for transit and bicycling and pedestrian users. Co-locating these modes at the same location will increase use and reduce costs. Plus creating a 1/2 mile ramp with a 4 % grade will create a public hazard to pedestrians and other cyclists.

IBR Draft SEIS - RECORD #3317 DETAIL

First Name :	Mollye
Last Name :	Pooton
Attachments :	D1_3317_Pooton_20241118_Original.pdf (6 kb)

IBR Draft SEIS - RECORD #3317 DETAIL

Submission Date : 11/18/2024
First Name : Mollye
Last Name : Pooton
Business/Organization/Agency :

Submission Input :

I think the IBR is failing to take into consideration certain technological advances that have occurred recently. Things that can't be cut and pasted from the CRC. Autonomous vehicles are on the verge of disrupting the trucking industry. They speculate it will be widely adopted anywhere from 2027-2040 (far within the IBRs 2045 cap).

They're looking at 17-24 percent fuel savings, not to mention a whopping 45 percent savings in labor. Also, now you're no longer impeded by circadian rhythms, you could now travel through the night when there's less traffic, for further logistical optimization. The IBR's marketing makes it sound like the we need the bridge to "keep america moving" when in fact freight amounts for a measly 5 percent of all the traffic coming across the i5 bridge. A far cry from the "critical economic trade route on the west coast." I asked about the IBR representative at the town hall meeting at the expo center who was using the bridge and they couldn't tell me. Or perhaps, wouldn't tell me. I have eyes, and can read, and the majority of the license plates read WASHINGTON.

Any congestion gains its hoping to make is made possible by removing access to Oregonians traveling north. In particular, Hayden Island. If Oregonians want to visit Hayden Island, they'll have to cross the river into Vancouver, pay a toll and spin around and come south. Vancouver will still have uninhibited access to tax evasion (er tax refugees - the PC term for it). Hayden Islanders will have to suffer through an auxiliary route that wipes out homes and communities by its eastern approach (a western approach has SIGNIFICANTLY less displacement and also would straighten the deadly S curve getting into Washington. Look at the map, draw a straight line from marine drive to SR14). Currently, the convergence of marine drive and mlk onto I5 North is twenty five minutes of traffic hell. Something similar would be the only way onto the island. Good luck getting an ambulance in there…Not to mention all the coagulation from Jubitz on the east and logistics companies off western marine drive still converging in that area. This entire endeavor makes advances at the expense of oregonians.

The big issue in this year's Mayoral Race? Housing! What does the IBR propose? Lets remove housing! Destroy Oregon communities so we can put a light rail to Vancouver that nobody wants. I like public transit, I just don't think people should lose their homes for it, especially those who live in a separate state. Especially, a diverse community where the majority of residents qualify as low income. The ODOT relocation assistance program is a joke. Published in 2015, it's examples and compensation structures are horribly outdated ($650 a month rent!). Since it was last updated, rents have doubled (and tripled in some places) and median home prices have gone up 72%! (313K vs 539K).

Also, 54% of this cumbersome bridge will be dedicated to light rail, pedestrian, and public transit. I think everyone thinks a lift span is a bad idea, it will have to go another 60 feet higher in the air before the coast guard approves it. Who wants to bike up a mountain? I would commute by bike from se to nw daily and would carry my bike up three stories up the stairs, and that was awful. I can't imagine taking it up ten stories! The

only people who are going to be crossing this bridge are going to be rich old dudes in spandex with two thousand dollar recumbent bikes.

I would also still like to explore the concept of a tunnel. Seems alot of the data was inaccurate and proven wrong. I would love to see that revisited as a viable option from a third party source not associated and independent of the IBR. You could even use the old (historic!) bridge for light rail, pedestrians, and public transit.
“But its expensive to maintain a bridge,” true. However the new bridge will be exceedingly more expensive to maintain. I've read projections from engineers that factor maintenance projections at 4 percent a year of the total cost of the bridge. 4 percent of 4 billion is 160 million! Meanwhile the existing bridge costs 1.2 million a year to operate with an alleged $270 million in capital maintenance . Still far less than 160 million a year….

Also, how much is it going to cost to dismantle the old bridge?
What's the seismic resilience of the new bridge vs the old bridge? I know the new bridge isn't being built to spec to survive an M9 event. There’s a 37% chance the cascadian subduction zone is going to throw us a magnitude 9 earthquake in the next 50 years and I don’t believe this new bridge will be able to survive such an event either.

Moving on to Safety, the IBR considers safety a priority. The congestion greatly alleviates north bound after it passes the SR14 east exit just coming off the bridge. In my experience, vehicles shuffling into that lane creates one of the worse bottlenecks in the corridor. Also, the IBR program cites poor sight distances as a safety concern. Two things greatly contribute to this. Inclines and curves. It also encourages ghosting which also exacerbates congestion. The current IBR trajectory has it approaching on the east side which creates an even worse S-curve when it gets into washington. Add that to a 60 foot increase in bridge height to satisfy the coast guards approval/request for the bridge and you have a pretty severe impediment to line of sight vertically. Not only is this dangerous, but it also obviously is a catalyst for congestion. However a eastward approach is straight line from delta park to downtown vancouver. I'm having a hard time understanding why east is the logical vector. You’d displace less people and destroy less businesses in the process. The collateral damage to hayden island is considerably lessened. Unless section (4)f is stronger than the fourth amendment. I posed such a question at the expo center and they explained (sort of) 4F protections. Now a eastward shift would mean the urban forestry center would have to relocate their parking lot, and that weird cul-du-sac on the north west corner would be swallowed up for the “greater good.” I think Delta park is a bit different than your typical city park. It has very little local community connection and is typically utilized by people who do not live nearby. Any value to the local community, like the dog park on the north side, were all but sacrificed to the houseless and addicts. The rest of it, the sports center remained immaculate. We’ve got two park tourism and community tourism, and the Delta park sports complex caters almost entirely to the former. You can always build another ball diamond somewhere else after all. The Delta park walmart remains empty and sits right next to the park (inasmuch people used to park there during games versus actually inside delta park). An eastward expansion would rectify any losses on its westward edge.

Also, an eastside expansion would displace and impact far less of hayden islands community members. Columbia Crossings (based in Seattle) would have to reconfigure its Moorage at Jantzen Bay. They’ve already done much of this work to a certain degree by removing the boat houses and fingers on row 8, as well as much of row 7. Row 9 sits closest to the bridge (20 feet!) whereas JBMI’s row A sits significantly further away on the

west side (about 100-150 feet) . More than- half of the houses on row 9 are not occupied, and all of them rent their slips. The members of JBMI own their slips. 100 percent of the houses on jbmi's A row are occupied, a majority of them by low income residents in houses that because of structural integrity cannot and should not be moved. In a matter of days, Row 9 could be relocated onto Row 7. The Columbia river has a surplus of boat slips and a deficit of places for floating homes.

I live in the impact area, and I've had to go out of my way to find any information. Community outreach has been absolutely abysmal despite the shiny pamphlets stating otherwise.

The cost of this bridge far outreaches any of its proposed benefits. It's not even a lateral move. It's nothing short of a flashy demotion once you cut through to the facts.

-Destruction of small business and the jobs it provides,
-Loss of homes and communities on Hayden island.
-destruction of our riparian ecosystems
Are just a few of the casualties.

IBR Draft SEIS - RECORD #3318 DETAIL

First Name :	Brad
Last Name :	Halverson
Attachments :	D1_3318_Halverson_20241118_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #3318 DETAIL

Submission Date :	11/18/2024
First Name :	Brad
Last Name :	Halverson
Business/Organization/Agency :	

Submission Input :

Hello - I support building the IBR with the two-level fixed span option being slightly preferred over the one-level fixed bridge. LRT and active transportation being in a protected environment is desirable. The most important issue is to keep the 2 auxiliary lanes and the C Street ramps. The lineup to access that single auxiliary lane on the C-D could be very problematic. Thank you.

IBR Draft SEIS - RECORD #3319 DETAIL

First Name :	Emily
Last Name :	Dantonio
Attachments :	D1_3319_Dantonio_20241118_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #3319 DETAIL

Submission Date :	11/18/2024
First Name :	Emily
Last Name :	Dantonio
Business/Organization/Agency :	

Submission Input :

Table 2-3 lists out the different bridge alternatives. It lists the maximum grade that would be experienced on both the washington and oregon side. I'm curious how the grade would differ for the pedestrian/bike infrastructure for the two leveled bridge. Does having the infrastructure separated vertically decrease the grade for active transportation users? I think it would be helpful to add the average grade for pedestrian and cyclists to this table.

Also there were no costs listed within this table. I think it would help to know how the different designs cost out compared to each other to decide which design meets needs while also being fiscally responsible.

Thirdly I'm curious if there is plan to increase toll rates in accordance with inflation. Currently tolls were proposed for 2026 dollars. With the unpredictability of inflation due to current economic climates the effectiveness of these toll values in the opening year might have diminished impact on diversion if the toll rate doesn't keep up. I think the toll should at a minimum be the rate of a one way transit fare to be competitive with the bus fare as well as the lrt fare and that the toll rate should increase as transit fares increase.

IBR Draft SEIS - RECORD #3320 DETAIL

First Name :	Joseph
Last Name :	Horner
Attachments :	D1_3320_Horner_20241118_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #3320 DETAIL

Submission Date :	11/18/2024
First Name :	Joseph
Last Name :	Horner
Business/Organization/Agency :	

Submission Input :

I believe that there should be options in the current I-5 bridge proposal that Do Not include the light rail. It is far too expensive to the project, which will most likely end up over budget to begin with. Vancouver does not need the light rail and building it along with a new bridge would be a terrible waste of time and tax payers money.

IBR Draft SEIS - RECORD #3321 DETAIL

First Name :	Andrew
Last Name :	Betts
Attachments :	D1_3321_Betts_20241118_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #3321 DETAIL

Submission Date : 11/18/2024
First Name : Andrew
Last Name : Betts
Business/Organization/Agency :

Submission Input :

I am a cyclist and bike across the interstate bridge. The proposed half-mile ramp that spirals down to the Vancouver waterfront from the bike lane is a bad idea. It would take cyclists a mile out of the way and create barriers to use. It would be much better to put the cycling lanes on the same side with transit all the way to the last transit station at Evergreen Boulevard so that cyclists and other non-motorized users have direct access to the bridge.

I love putting my bike on the Max to reach destinations and having the bike path and transit station on the same side would allow people to take advantage of multimodal transportation too, especially if you can step off of transit and be right next to a bike path. Moving the bike lane next to transit would also shield cyclists from noise, wind and debris generated from cars. Ask anyone who has biked the 205 bridge and they'll tell you you the same! Add trees, public art, proper lighting and vantage points, and this could be not just a path, but an amazing experience.

It's vitally important that there are safe connectors to the bike lane on the bridge from Vancouver and Portland. This means keeping bikes and other users away from busy streets and freight traffic. Access should be straightforward, well signed, and separated from cars.

Thank you.
-Drew

IBR Draft SEIS - RECORD #3322 DETAIL

First Name :	George
Last Name :	Hutchison
Attachments :	D1_3322_Hutchison_20241118_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #3322 DETAIL

Submission Date :	11/18/2024
First Name :	George
Last Name :	Hutchison
Business/Organization/Agency :	

Submission Input :

Light rail brings crime

IBR Draft SEIS - RECORD #3323 DETAIL

First Name :	Brandon
Last Name :	der Blatter
Attachments :	D1_3323_DerBlatter_20241118_Original.pdf (2 kb)

IBR Draft SEIS - RECORD #3323 DETAIL

Submission Date : 11/18/2024
First Name : Brandon
Last Name : der Blatter
Business/Organization/Agency :

Submission Input :

let me tell you about something called induced demand. it's a phenomenon particularly applicable to roads where you add more lanes to reduce traffic. drivers, noticing the travel time is faster, decide to make more trips by car. then you're right back where you started, only you spent billions of dollars in the meantime. do not build additional lanes. do not build lanes exclusively for electric or clean fuel vehicles (they generate just as much tire pollution as gas powered cars or more if they're heavier like BEVs). if you want to make a difference, take existing lanes and give them to transit only. take existing infrastructure and put trains on it. we've known for well over a century that trains are more efficient than cars in every conceivable way. please build for trains, not cars.

anything in your studies saying that traffic collisions will go down or travel times will be faster by adding lanes is rendered moot by induced demand. look it up. and no matter how safe you make car travel, it will never be as safe as train travel. on average cars kill 1,000,000 people per year. fewer than 1,000 people are killed by trains each year. trains are so incredibly safe compared to cars. if you really care about safety, you'll build rails for trains, not extra lanes for cars. if you really care about the environment, you'll build rails for trains, not extra lanes for cars.

I am strongly opposed to adding any auxiliary lanes for cars. I strongly support robust infrastructure for trains.

IBR Draft SEIS - RECORD #3324 DETAIL

First Name :	Dena
Last Name :	Rossi
Attachments :	D1_3324_Rossi_20241118_Original.pdf (2 kb)

IBR Draft SEIS - RECORD #3324 DETAIL

Submission Date :	11/18/2024
First Name :	Dena
Last Name :	Rossi
Business/Organization/Agency :	Combined, a Chubb Company

Submission Input :

I am a lifelong resident of Clark County. My father (John Zavodsky) came here to teach in the Evergreen District 1956 - 1957 school year so I have seen huge changes throughout the County.

I was traveling 5 to 7 days a week on the I-5 corridor for 30 years of my 45 years of employment (I was blessed to work from home for 10 years - 2002 to 2012).
There have been some improvements and accommodations to the route in the last 10 years but as noted, the bridge spans are aging and would not withstand an earthquake near here and the I-205 bridge cannot handle all the traffic even if it had no damage.
I had WA State History in high school, and I volunteered at the Fort Vancouver Historical site in the late 1980s, so I know the Historic Sites are important to SWWA and the PNW.

I knew the basic impacts to the I-5 corridor and connecting roads but had not realized there was also to be changes to the way SR-14 connects to I-5 which appears to impact the National Historic Site to some extent.

I realize modernization of the highway systems is imperative (as one who has dealt with major stalls and bridge lift issues for decades) but I hope that as little change as necessary is being considered as to preserve the Historic Site that people fought very long and hard to get recognized so the area could be preserved.

As far as the I-5 corridor and the changes for Mill Plain, Fourth Plain, and SR-500, those have been anticipated since the original attempt at bridge replacement took place. I do hope any displacement of households would be considered long and hard and if they are necessary, full market value and placement services would be used to make people whole. Much of the area along I-5 have houses and households that have been there many decades, since following the ship building era.

I do appreciate how this incarnation of the bridge replacement has worked to keep everyone in the loop even with the concerns and complaints. All this has to go forward, or the area will come to a standstill traffic-wise or have a crisis due to a bridge collapse or serious damage.

Please move along a quickly as you are able for 2 reasons - the huge expense that is getting bigger by the month & less government money able for it by the year & because we needed this replacement traffic-wise when I started working in 1978 and this project likely won't be done for another 10 years yet (2035)!

Thank you for this public response time.

IBR Draft SEIS - RECORD #3325 DETAIL

First Name :	Katie R
Last Name :	Pichette
Attachments :	D1_3325_Pichette_20241118_Original.pdf (2 kb)

IBR Draft SEIS - RECORD #3325 DETAIL

Submission Date : 11/18/2024
First Name : Katie R
Last Name : Pichette
Business/Organization/Agency :

Submission Input :

[-2.2.2 Portland Mainland and Hayden Island: has pervious pavement overlay been considered?

-2.2.4 Downtown Vancouver (Subarea C) Transit: “The light-rail tracks would be a minimum of 27 feet above the I-5 roadway surface.” What precautions are being taken for bird migration/bird safe glass?

-2.2.5 Upper Vancouver (Subarea D): would the reconstruction incorporate reusing/recycling existing roadway and concrete or just be hauled away and disposed of?

-2.2.6 Transit Support Facilities - Ruby Junction: “The connections to the runaround track would require partial demolition of an existing TriMet building plus full demolition of one existing building and partial demolition of another existing building on the private property west of the south end of Eleven Mile Avenue.” - is there a plan for any deconstruction and reuse/recycling of the existing building materials? Expo Center Overnight: “The connection tracks would require relocation of one or two existing LRT facilities, including a traction power substation building and potentially the existing communication building, which are both just south of the Expo Center MAX Station.” - is there a plan for any deconstruction and reuse/recycling of the existing building materials? Additional Bus Bays: would these facilities incorporate green roofs or on-site stormwater management with the additional footprint?

-2.3 Modified LPA Construction: “Demolition of the existing Interstate Bridge would take place after the new Columbia River bridges were opened to traffic.” Is there a plan for any deconstruction and reuse/recycling of the original bridge materials?

-2.3.1 Construction Components and Duration: “The existing North Portland Harbor bridge would be demolished in phases to accommodate traffic during construction of the new bridges.” Is there a plan for any deconstruction and reuse/recycling of the original bridge materials?

-3.7.3 Long-Term Benefits and Effects: Wy’East Way Trail “Approximately 140 linear feet of the trail, where it currently crosses the existing LRT tracks, would need to be reconstructed once construction of the new tracks and pavement for the Ruby Junction Maintenance Facility completes” Is pervious pavement being considered? “The Modified LPA would realign and reconstruct Marine Drive, requiring approximately 3,000 linear feet of the 5-mile Marine Drive Trail to be demolished and rebuilt in a similar location.” Is there a plan for any deconstruction and reuse/recycling of the original trail materials?

-3.14: I’m grateful to see 6PPD-quinone is being addressed and the modified impervious surfaces have been reduced therefor the total suspended solids discharged from impervious surfaces are reduced. Has pervious pavement been considered where possible? I understand street sweeping/vacuums may not be an option for effective O&M on trails

IBR Draft SEIS - RECORD #3326 DETAIL

First Name :	Garrison
Last Name :	Christian
Attachments :	D1_3326_Christian_20241118_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #3326 DETAIL

Submission Date : 11/18/2024

First Name : Garrison

Last Name : Christian

Business/Organization/Agency :

Submission Input :

No additional lanes, this includes auxiliary lanes. Ditch the interchanges and expansion of areas outside of bridge. Seriously consider a tunnel option. We need quality high speed metro from Vancouver to downtown Portland. Invest more in public transit, walking, biking and dense mixed use development so we all don’t need cars.

IBR Draft SEIS - RECORD #3327 DETAIL

First Name :	Helena
Last Name :	Abernathy
Attachments :	D1_3327_Abernathy_20241118_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #3327 DETAIL

Submission Date : 11/18/2024
First Name : Helena
Last Name : Abernathy
Business/Organization/Agency :

Submission Input :

I think the double decker girder design with light rail and bikes and pedestrians underneath is the best alternative. Keep in mind that the curves on the lightrail tracks could slow down the train so much that it would not be worth taking to Portland.
However if it was under the roadway, it would be sheltered from adverse weather and wind.

For boats needing passage that are higher than the bridge, please provide unloading alternatives to smaller boats to continue the journey and docking spots for returning while waiting for freight.

Comments on tolling: Many people are worried they no longer can afford to go see their doctor if there are tolls and it would be too cumbersome and hours long to use light rail like to Hillsboro. Perhaps doctors can give vouchers for free tolling passage.

Also businesses using work trucks could be hurting having to go to Portland daily. Perhaps there could be tax advantages based on how much work was in Oregon?

IBR Draft SEIS - RECORD #3328 DETAIL

First Name :	Susan
Last Name :	Courtney
Attachments :	D1_3328_Courtney_20241118_Original.pdf (3 kb)

IBR Draft SEIS - RECORD #3328 DETAIL

Submission Date :	11/18/2024
First Name :	Susan
Last Name :	Courtney
Business/Organization/Agency :	Property owner/manager

Submission Input :

I am responding as a private citizen, a business owner operating in Downtown Vancouver, Washington, Historic District, and a property owner in Downtown Vancouver, Washington, Historic District. I understand eminent domain and am not opposed to the process.

WE NEED A THIRD BRIDGE, FIRST AND FORMOST!

Washington and Oregon have many bridges that could not withstand a significant earthquake, and they continue to be in use. The I-5 Bridge might be one of them.

My rights are being superseded by the government. Our own mayor and city manager are supporting a project that the citizens voted against. I was against the CRC and I am against the IBR. It is a political project and the people in charge are the only ones profiting from this boondoggle.

To replace a three-lane bridge with a three-lane bridge is insanity and to paralyze an entire downtown community in the process is heartless and bad business.

QUESTION: How many small businesses and, in turn, property owners in Downtown Vancouver, WA will be adversely affected by the street closures, construction and general chaos of the IBR and for how long? Have they been identified? Please list them. Will they survive? Will they be relocated?

The project has not been forthcoming with any of the details and the deals are being conducted in the back room. This will impact citizens, small businesses, the integrity of our Historic District and the health and welfare of Vancouver City Center.

QUESTION: Why is the IBR project moving forward without the approval of the Coast Guard?

I have attended the meetings and seen firsthand that the historic buildings are all expendable to this project.

QUESTION: Have historic properties in Downtown Vancouver, WA been identified in the documentation for the IBR? If so, please send a copy of the listed properties and ownership in Washington and Oregon.

This is clearly an Oregon driven fast-track for light rail for which Clark County citizens have expressed NO SUPPORT but will be expected to pay for. Light Rail is not a viable business. If it were a private business, it would not survive.

QUESTION: Can the IBR be completed without light rail?

The arrogant IBR believes they are smarter than the businessmen and women who voted against it. The

businesspeople who pay taxes, conduct profitable businesses without government support and must adhere to the government rules are being railroaded by government, politics, and private consultants who will all profit at the expense of us, the citizens, whether the bridge is replaced or not.

QUESTION: Why does Oregon have more "pull" than Washington?

A color picture of one of our historic properties was on the front page of the Columbian newspaper as a property that will be affected by IBR. We were blindsided by the article and not previously notified of the impact to the property and tenants. At the last meeting at Clark College, I asked to see a picture of the bridge and was told that there are no pictures of the elevation; and yet, I am losing tenants for the invisible, unknown bridge.

QUESTION: How will I be compensated for the loss of business that began the day the story broke in the newspaper because a new tenant no longer had any interest in signing a lease for a building that will be taken down. Subsequent current tenants that have been in the building over 20 years are concerned about their homes.

Citizens who must use the Interstate Bridge to access employment or conduct business will be impacted by tolls to cover the cost of a bridge that has no limit; costs that increase week by week. Only the government can operate like this. It would be like operating your household budget led by your naïve teenager using a credit card that has no limit.

C-Tran is a Vancouver, Washington bus system with extremely light ridership. It does not accommodate the hours of shift workers and locations. My grandson used the bus for work, and it took him 3 hours to get to work. I drove him to work in 20 minutes. Minimum wage citizens will not be able to afford paying tolls to cross the bridge.

IBR Draft SEIS - RECORD #3329 DETAIL

First Name :	Marie
Last Name :	Pahlmeyer
Attachments :	D1_3329_Pahlmeyer_20241118_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #3329 DETAIL

Submission Date :	11/18/2024
First Name :	Marie
Last Name :	Pahlmeyer
Business/Organization/Agency :	

Submission Input :

I was a resident of Hayden Island from September 2023 to July 2024 without a car by choice. I was grateful for the existence of pedestrian and public transit infrastructure, but there was clearly lots of room for improvement. While I don't think additional car-carrying capacity across the bridge will serve the surrounding communities well due to the futility of induced demand, there is a lot of room and incentive for improvement to pedestrian, bike, and transit infrastructure around the bridge project. It would be a huge loss to replace the bridge and not extend the MAX yellow line to Vancouver. I'm excited to see this already under consideration in the plans.

IBR Draft SEIS - RECORD #3330 DETAIL

First Name :	Herschel
Last Name :	Colbert
Attachments :	D1_3330_Colbert_20241118_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #3330 DETAIL

Submission Date :	11/18/2024
First Name :	Herschel
Last Name :	Colbert
Business/Organization/Agency :	

Submission Input :

I want to start by saying I’m glad we’re talking about this, I’m glad something is being done about it. Please don’t lose sight of the environmental claims of this region; keep the rail connections, keep the bus rapid lines, keep the bike lanes (protected of course!). Also, please be a net-positive and add more trees and natural vegetation to the site. Please don’t make it too big and oversized, we’ve seen time and time again that “just one more lane,” never reduces traffic, traffic just grows to fill in the extra lane. Thank you.

Also, if we could have more time to comment, that would also be great. Please extend the deadline.

IBR Draft SEIS - RECORD #3331 DETAIL

First Name :	Shaun
Last Name :	Gundert
Attachments :	D1_3331_Gundert_20241118_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #3331 DETAIL

Submission Date :	11/18/2024
First Name :	Shaun
Last Name :	Gundert
Business/Organization/Agency :	

Submission Input :

If the bridge doesn't have light rail, it doesn't modernize us. We are then just stuck with a larger, 20th century bridge. I will not be taking a bus over that bridge, whereas I would love to take light rail.

If you build it, people will use it. Expanding public transit is an issue of equity, and expanding public transit means increasing ridership and requires more than just additional busses.

Give us a train. Let us move forward together and have stronger communities.

IBR Draft SEIS - RECORD #3332 DETAIL

First Name :	Liam
Last Name :	Dunn
Attachments :	D1_3332_Dunn_20241118_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #3332 DETAIL

Submission Date : 11/18/2024
First Name : Liam
Last Name : Dunn
Business/Organization/Agency :

Submission Input :

My largest concerns with the possibility of adding more auxiliary lanes is that it makes a large freeway even larger. The roadway will be wider than the current conditions no matter which alternative is chosen, will this do more harm than good? Will I-5 loom over downtown Vancouver and Hayden island the same way it looms over Portlands Eastside? Will it further divide the city how it divides Seattle? Adding a couple cross interstate connecters does not undo widening the highway to such an extent. The estimates of travel times for no build, one, or two auxiliary lanes do not differ enough to justify adding any more lanes than absolutely necessary. Though its been controversial, especially in Oregon, I am glad to see that tolling is still a possibility.
Thank you.

IBR Draft SEIS - RECORD #3333 DETAIL

First Name :	Elisabeth
Last Name :	Oberst
Attachments :	D1_3333_Oberst_20241118_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #3333 DETAIL

Submission Date : 11/18/2024
First Name : Elisabeth
Last Name : Oberst
Business/Organization/Agency :

Submission Input :

I have a comment about the I-5 bridge tolls being added. I live in Vancouver, Washington, just the same as these hundreds of others who live here who cross the bridge on the weekly to day to day basis who don't enjoy being taxed and fined out of their life savings just to go a couple miles across the bridge. I don't understand how you could see how bad the traffic is every day just to get across the bridge and your idea is to add a toll and refurbish the bridges we already have instead of adding another one. Another thing is why in Washington would you add a light rail when we are half the size of the Portland metro area and if you look on the buses driving on the roads, no one is using them over here so why waste tax payers on stuff we don't need. Instead, maybe you would think of stuff that actually helped for example fixing the roads, road cleanup, building another bridge. Those are just a few ideas that come to mind that would actually help and be beneficial to our everyday lives as a working society. Instead of the city just being greedy and wanting to stuff their pockets full of tax payers money. The economy is alreay broken and hard to live in as is, don't add to the problem by making it worse.

IBR Draft SEIS - RECORD #3334 DETAIL

First Name :	W Dean
Last Name :	Irvin
Attachments :	D1_3334_Irvin_20241118_Original.pdf (12 kb)

IBR Draft SEIS - RECORD #3334 DETAIL

Submission Date :	11/18/2024
First Name :	W Dean
Last Name :	Irvin
Business/Organization/Agency :	Property owner/manager

Submission Input :

Draft Supplemental Environmental Impact Statement

Section 106 Determinations of Eligibility and Findings of Effect

November 17, 2024

The rejection of extending Portland, Oregon's light rail system into Vancouver, Washington, particularly the MAX Light Rail, stems from several factors rooted in political, economic, and cultural concerns. Here are some of the key reasons:

1. Tax Concerns: Many residents in Clark County were opposed to the potential increase in taxes that might be required to fund the light rail extension. They were concerned that the costs of maintaining and operating the light rail would outweigh its benefits.

2. Anti-Urbanization Sentiment: A portion of Clark County residents preferred to maintain the suburban and less urbanized character of the region. They feared that the light rail would lead to more dense development and increase Portland's influence in their area.

3. Crime and Social Issues: Some opponents expressed concerns that extending the light rail would make it easier for crime to spread from Portland into Vancouver. This perception, while often debated, played a significant role in public discourse.

4. Transportation Preferences: Many in Clark County prefer investments in road infrastructure over mass transit. They argued that light rail would not sufficiently address congestion issues on the I-5 corridor, particularly at the Columbia River crossing.

5. Distrust of Portland's Influence: The cultural and political differences between Vancouver and Portland also played a role. Some residents felt that bringing in Portland's light rail system would give Portland undue influence over Clark County's development and policies.

6. Failed Columbia River Crossing (CRC) Project: The proposed light rail was tied to the Columbia River Crossing, a project to replace the I-5 bridge. Opposition to the CRC project's cost, tolling plans, and inclusion of light rail ultimately contributed to its cancellation in 2013.

What are the solutions for 1 through 6 above?

The environmental impact of extending Portland Oregon's light rail system into Vancouver, Washington

involves drawbacks. Here are a few of the impacts:

Environmental Drawbacks:

1. Construction Impacts:
Building the infrastructure for light rail involves significant environmental disruption, including the use of energy-intensive materials (like steel and concrete), habitat destruction, and potential water pollution from runoff during construction.

2. Energy Demand:
While electric-powered, light rail increases regional electricity demand. If the grid relies on fossil fuels, the environmental benefits may be offset to some extent.

3. Loss of Open Spaces:
New light rail lines and stations may encroach on undeveloped land or areas with ecological value, disrupting ecosystems and wildlife corridors.

4. Encouragement of Urban Expansion:
Improved connectivity between Portland and Vancouver could increase development in areas not currently urbanized, potentially leading to more environmental strain in the long term.

Residents of Vancouver and Clark County, Washington have had opportunities to vote on issues related to bringing Portland, Oregon's light rail into the region, often tied to broader transportation projects like the Columbia River Crossing (CRC). These votes and public debates illustrate that the majority of Clark County residents have historically opposed extending Portland's light rail system into Vancouver, primarily due to financial, political, and cultural concerns. Here are key moments:

1. 1995 Vote:
Clark County residents voted on a proposed sales tax increase to help fund light rail as part of a bi-state transportation plan. The measure was decisively rejected, reflecting strong opposition to light rail at the time.

2. 2012 Vote on C-Tran Tax Increase:
In 2012, voters in parts of Clark County considered a 0.1% sales tax increase to fund the operation of a proposed light rail extension from Portland to Vancouver as part of the CRC project. This measure also failed, with around 56% of voters rejecting it. The rejection was seen as a significant blow to the light rail proposal and the larger CRC project.

3. Public Input on the Columbia River Crossing:
though not a direct vote, public opposition to the inclusion of light rail in the CRC project played a major role in the project's eventual collapse in 2013. Critics often cited concerns about costs, tolling, and the overall necessity of light rail for the region.

These votes and public debates illustrate that the majority of Clark County residents have historically opposed

extending Portland’s light rail system into Vancouver, primarily due to financial, political, and cultural concerns.

Why would the above issues be different today?

Will Vancouver Residents Get to Vote Again?

If YES: Please Explain

If NO: Please Explain

The loss of historic properties due to the Interstate Bridge Replacement (IBR) project has significant cultural, social, and community impacts. These effects go beyond physical structures, as historic buildings represent a connection to the past and contribute to the character and identity of a community. Here’s a breakdown of some of the potential effects:

1. Loss of Cultural Heritage and Community Identity
• Historical Significance:
Buildings on the historic register often reflect unique architectural styles, craftsmanship, and the stories of the people who built and used them. Their demolition erases tangible links to Vancouver’s past, weakening the community’s sense of continuity and identity.
• Loss of Shared History:
When historic buildings are removed, the stories they represent may fade from collective memory, making it harder for future generations to connect with the area’s cultural roots.

2. Social and Emotional Impact on Residents
• Displacement:
Residents and businesses in affected properties may face displacement, disrupting their lives and potentially leading to a loss of community cohesion. For renters and small business owners, relocation can mean financial hardship and a loss of loyal customer bases or neighborhood ties.
• Emotional Impact:
The destruction of familiar landmarks can cause sadness or resentment among residents, especially those with personal or familial ties to these properties.

3. Economic Implications
• Tourism Loss:
Historic buildings often attract tourism, bringing economic benefits to the community. Losing these properties could reduce opportunities for heritage tourism.
• Missed Revitalization Potential:
Historic buildings can often be repurposed in ways that enhance economic development while preserving their character. Demolition forecloses these possibilities, replacing irreplaceable architecture with potentially generic modern structures.

4. Environmental Impact of Demolition

• Embodied Carbon Loss:
Historic buildings represent significant investments in materials and energy from their original construction. Demolishing them and building new structures generates waste and increases the carbon footprint, counteracting sustainability goals.

The challenge for the IBR project lies in balancing modern transportation needs with the preservation of the community's cultural and historical fabric. Including community voices in decision-making, prioritizing mitigation efforts, and seeking creative design solutions can help minimize the negative impact on Vancouver's history and identity.

The financial impacts on businesses and residents in the Vancouver, Washington and Portland, Oregon area during the proposed 10-year construction of the Interstate Bridge Replacement (IBR) project include significant disruptions and economic losses:

1. Business Disruption: The IBR project spans five miles and involves major interchange reconstructions and the addition of a new bridge. Businesses along this corridor, particularly small local establishments, will face reduced customer access, traffic delays, and temporary closures during construction, leading to lost revenue.

2. Tourism Impact: Construction-related congestion and aesthetic disruptions might deter tourists from visiting downtown Vancouver and nearby attractions. Traffic delays may also impact cross-border travel between Washington and Oregon, affecting events and local tourism economies.

3. Residential and Cultural Displacement: Over 160 properties, including some with historic significance, are expected to be affected, potentially displacing long-standing businesses and residents. This could alter the character of certain neighborhoods and reduce the appeal of the area for visitors.

4. Compensation and Mitigation: How will businesses and residents be compensated for loss of business and disruption during IBR construction?

W. Dean Irvin
[redacted]

IBR Draft SEIS - RECORD #3335 DETAIL

First Name :	Dana
Last Name :	Fox
Attachments :	D1_03335_Fox_20241118_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #3335 DETAIL

Submission Date :	11/18/2024
First Name :	Dana
Last Name :	Fox
Business/Organization/Agency :	Video Only Jantzen Beach

Submission Input :

I bicycle to work at Jantzen beach via Denver Ave to the Expo center and then along the current bike path that loops around and over the sidewalk beside extremely noisy traffic on I-5. In rainy weather I often board Trimet.

The major design flaw of the bicycle and pedestrian path is that it should parallel Trimets' bridge path like the successful Tillicum crossing bridge in Portland. The Max station at Jantzen Beach and Vancouver should be adjacent to the bike path for easy on/off for cyclists and pedestrians to easily access max. The high Max station at Vancouver circuitous link to the bike path makes it difficult for pedestrians and cyclists.

It would be best to complete the Trimet bridge with parallel bike path before completing the auto portion. This would encourage Mass transit and cycling . This would aid short and long term environmental impacts.

IBR Draft SEIS - RECORD #3336 DETAIL

First Name :	Cameron
Last Name :	Crowell
Attachments :	D1_3336_Crowell_20241118_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #3336 DETAIL

Submission Date :	11/18/2024
First Name :	Cameron
Last Name :	Crowell
Business/Organization/Agency :	

Submission Input :

Bi-Directional Water Slide NOW!

IBR Draft SEIS - RECORD #3337 DETAIL

First Name :	Zachary
Last Name :	Turcich
Attachments :	D1_3337_Turcich_20241118 _Original.pdf (2 kb)

IBR Draft SEIS - RECORD #3337 DETAIL

Submission Date : 11/18/2024
First Name : Zachary
Last Name : Turcich
Business/Organization/Agency :

Submission Input :

The analysis should consider the potential effects of induced demand. It doesn't appear to be mentioned at all in the SEIS documents. The use of five car lanes in each direction with two auxiliary lanes seems overengineered for the demand that the bridge faces. Bottlenecks largely appear to be at roadways further north and south of the bridge, and outside of the IBR's scope.

To accommodate for relieving demand the project should place more future-proofing capacity on alternative modes, such as transit and active transportation.

To this end, higher capacity systems like dedicated Bus Rapid Transit lanes, meeting heavy rail requirements, and stations should allow for four car configurations while building out the Light Rail extension portion of the bridge should be prioritized. This will allow for future transit improvements to be made at a lower cost down the line. Additionally, the multiuse path for bikes and pedestrians should be separated from the main roadways while also being next to and well connected to the transit stations like the planned light rail stations. Allowing for easy transfers will allow for more transit use rather than adding to car traffic. The active transportation lanes need to be positioned to reduce noise, debris, and conflicts with cars. The active transportation connection into Portland should extend toward the Vancouver/Williams corridor for better connectivity and use.

Overall, it feels like the project could bring down costs while still delivering high mobility by focusing investment on public transit capacity and replacing the bridge instead of expanding the number of lanes and ramps to such large sizes.

IBR Draft SEIS - RECORD #3338 DETAIL

First Name :	Randy
Last Name :	Johnson
Attachments :	D1_3338_Johnson_20241118 - Original.pdf (1 kb)

IBR Draft SEIS - RECORD #3338 DETAIL

Submission Date :	11/18/2024
First Name :	Randy
Last Name :	Johnson
Business/Organization/Agency :	

Submission Input :

NO TOLLS! Tolls are just a waste of tax payer money. If we were to enact tolls, then we would need to pay for tolling software, tolling programmers, and tolling management. The tax payers would have to pay some oversized government contract with a third party just to run the tolls. Such a waste of money. Also, there is a new scam that is popping up with the tolling company that is used in Seattle - the scam says that you owe a toll fee and have to pay it right away. So if we institute tolls, we have to pay for all this additional management AND we will most likely get scammed by some creep trying to steal our money.

Just increase the metro transit tax that we already pay in Oregon and then have a small regional sales tax in Washington. Then you get all the funds to upkeep the bridge without having to pay for ridiculous third party fees AND we won’t be scammed at least from people Pretending to run the tolls.

IBR Draft SEIS - RECORD #3339 DETAIL

First Name :	Kristian
Last Name :	Adair
Attachments :	D1_3339_Adair_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #3339 DETAIL

Submission Date : 11/18/2024
First Name : Kristian
Last Name : Adair
Business/Organization/Agency :

Submission Input :

Build it bigger than you think! This is a generational bridge and it should reflect future growth, multimodal options and distinctive design (this is a centerpiece!).

Gotta have a local Hayden Island bridge, extend the carpool lane. Not everyone will be happy… this is why we have government to execute for us.

No drawbridge! (Why not consider a tunnel?). I don't love tolls on an existing interstate, but if you do one you gotta do both 5/205.

Also, verrrry frustrating when I'm trying to periodically travel interstate north of the region and get bogged down with Vancouver commuters

IBR Draft SEIS - RECORD #3340 DETAIL

First Name :	Aaron
Last Name :	Kuehn
Attachments :	D1_3340_Kuehn_20241118_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #3340 DETAIL

Submission Date :	11/18/2024
First Name :	Aaron
Last Name :	Kuehn
Business/Organization/Agency :	

Submission Input :

The IBRP planning process began in 2005, almost 20 years ago, but the current bridge we have is still getting the job done for drivers and freight. Population in Oregon is currently declining. It seems likely that 20 years from now the current bridge will still meet our needs as well as it does today for driving and freight, and that the modeling and projections that show dramatic increases in these uses are flawed. The Purpose and Need should be revised to reflect more accurate trends, data, and modeling.

IBR Draft SEIS - RECORD #3341 DETAIL

First Name :	Chris
Last Name :	Erickson
Attachments :	D1_3341_Erickson_20241118_Original.pdf (2 kb)

IBR Draft SEIS - RECORD #3341 DETAIL

Submission Date : 11/18/2024
First Name : Chris
Last Name : Erickson
Business/Organization/Agency :

Submission Input :

This comment concerns highway and automobile matters.

- I strongly support tolling as a component in this project. It is fact that our roads and highways are a net drain on our tax dollars and it is fact that road users do not pay anywhere close to the true cost of maintaining them. Tolling brings us closer to reality so that all who choose to drive pay their fair share.

- I strongly support the removal of the C-Street ramps option. Downtown Vancouver is a vibrant and thriving area of the city and a place that is pleasant to walk and bike in. Good urban planning lessons argue that downtowns are for people, not for cars. The C-Street ramps will sacrifice a more pleasant city experience for the convenience of driving in & out. Having the Mill Plain exit be the entrance and exit to downtown via I-5 is more than sufficient for those choosing to drive. Let's keep our downtown pleasant and not fill it up with more cars.

- I prefer the double-decker bridge design option. This will greatly reduce the width of the bridges and the footprint it takes up. The single-deck option is ok. But the movable span option should be disregarded. Part of the whole point of this project is to remove the pain point of a drawbridge, so let's not do that again.

- I do not care for the westward shift of I-5. The interstate should be no wider than is absolutely necessary. We've learned about the devastating impacts that building/widening highways has done in this country, especially through downtown areas. Please do not repeat the mistakes of the past. Keep the highway as skinny and lean as possible, and minimize the effects of private property displacement/demolition.

- Sound barriers are an absolute must, especially in Vancouver. Minimizing noise and vehicle pollution in Downtown Vancouver keeps the area pleasant. Doing the same for Fort Vancouver keeps that area a tranquil oasis of greenery and open space in our city and helps mitigate the encroachment of our urban present on the historical past of this special place.

IBR Draft SEIS - RECORD #3342 DETAIL

First Name :	Aaron
Last Name :	Kuehn
Attachments :	DSEIS-3342_Kuehn_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #3342 DETAIL

Submission Date :	11/18/2024
First Name :	Aaron
Last Name :	Kuehn
Business/Organization/Agency :	

Submission Input :

Improved transit, biking, and walking connections over the Columbia River, which are needed, would be better served by a crossing facility that is physically separated from the facility for driving and freight, similar to the Tilikum Crossing in Portland. A parallel car-free facility could be constructed in a shorter timeline, providing a more earthquake resilient emergency connection sooner, and be completed for a small fraction of the ballooning IBRP budget. Physically decoupling the green travel facilities from driving and freight will make them more pleasant, more practical, and more likely to be used. Please study a parallel car-free alternative crossing for transit, biking, and walking.

IBR Draft SEIS - RECORD #3343 DETAIL

First Name :	Tarn
Last Name :	Ohana
Attachments :	DSEIS-3343_Ohana_Original.pdf (4 kb)

IBR Draft SEIS - RECORD #3343 DETAIL

Submission Date : 11/18/2024
First Name : Tarn
Last Name : Ohana
Business/Organization/Agency :

Submission Input :

1. The Draft Supplemental Environmental Impact Statement (DSEIS) purpose and need statement:
a) I am not accustomed to reading high fantasy in draft supplemental impact statements. However, the antique purpose and need statement, which is old enough to purchase alcoholic beverages in Canada, insists upon a 1.5% increase in vehicles using the crossing each year. This assumption undergirds a host of flaws that percolate throughout this and other documents relating to the IBR project. Rather than continue with this delusional work of fiction, the DSEIS analyses and other models that are part of the planning for this project must – yes, must – reflect a much more realistic rate of change in the number of vehicles crossing each year at this location. Holding onto this assumption could seriously jeopardize any continuing work, as the assumption is verifiably no-where near reality, and incredibly important to how environmental impacts are modeled in the DSEIS. If a challenge is filed under a violation of NEPA, everything will have to be thrown up in the air and all this work performed again anyway.
b) Safety and crash rates for motor vehicle crashes are not normalized for severity. As any road engineer might know, a feature of a road may contribute to crash rates. Not all crashes are equal. The FHWA encourages jurisdictions to evaluate risk based on severe crash rates, i.e., crashes that result in a fatality or a serious injury. Sometimes, we can add features to a roadway that can modestly increase crash rates while eliminating or significantly reducing severe crashes. For example, installing a modified two-lane roundabout at an intersection can modestly increase overall crashes while reducing congestion, but also reduce severe crashes by 80% to 100%. Both the section in the purpose and need statement and the comparison of crash experience in
2. DSEIS 2.02 – Components of the Modified Locally-Preferred Alternative:
a) I have noted over time that the IBR program neatly elides evaluating any tunnel or immersed tube options for the route under the Columbia River. I feel that this is deeply problematic and needs to be evaluated as one of the options for comparison to elevated bridge options. Analysis of the tunnel/immersed tube options should be included in the DSEIS because of the significant environmental benefits that should be considered and compared to other elevated options, specifically, but not exclusively: improvements in air quality; reduction of noise pollution from the deafening and ceaseless roar from an elevated freeway; improvements to safety for migratory birds; improvements in safety for river navigation; etc. Furthermore, the IBR rejected a buried or immersed tube option based on extremely flawed and inaccurate – or dare I say downright fraudulent – assumption on cost.
b) The existing LPA as presented in the DSEIS happens to include ‘shoulder-running’ bus transit facilities. However, buses are very heavy and running them on the edge of a bridge can create significant engineering problems, as we have seen in the Jeanette Williams Memorial (West Seattle) Bridge in Seattle. Creating a pavement-level running light-rail zone on the bridge, as the Tillikum Crossing was designed and currently operates, would allow buses and light rail trains separate and dedicated, heavy infrastructure.
c) The insistence on including all existing interchanges with the LPA bridge options all result in massive, disastrous impacts on the local health and well-being of the area’s residents, workers, visitors, travelers, and environment. I cannot believe the tenacity with which, for reasons unknown and unfathomable, the IBR project insists on maintaining all existing interchanges with the increased height of the bridge. These interchanges *already intersect with an existing freeway.* This existing freeway can be used, without major changes, to bring

travelers and freight from the extremities near the Columbia River in reverse and transfer them to the new crossing. For example, people using the crossing – whether a bridge, tunnel, or teleportation portal – in vehicles or freight on Hayden Island would connect with the existing freeway under the new bridge and proceed in a southwesterly direction to a SINGLE new interchange south of OR-120, or at OR-120, before heading back northeast into the crossing. Similarly, people using the crossing in Vancouver at WA-14 or even Mill Plain Blvd, hoping to cross to the Oregon side, would use the existing freeway to head northeast before using a single interchange to connect to the crossing and head southwest. The lack of these types of alternatives is a serious deficiency in the DSEIS and shows a sort of inflexibility that is a discredit to the IBR and the engineering and planning professions.

3. The DSEIS 3.10 – Air Quality:

This section fails to reasonably anticipate increased transit service and transit service capacity in Clark County and south-western Washington State. Hundreds of millions of dollars each year in funds from the Climate Commitment Act of 2021 are transferred to transit projects and expansion of service. The assumption of 1% increase in capacity revenue hours each year for transit is a poor choice. Increasing this rate of change in transit service to 3% or more would be a better choice. Any sections of the DSEIS including assumptions about transit ridership should also include this higher rate. Combined with dedicated transit space on any crossing (bridge, tunnel, teleportation), this higher rate would lead to more significant improvements in air quality compared to the no-build alternative.

IBR Draft SEIS - RECORD #3344 DETAIL

First Name :	Daniel
Last Name :	Fuller
Attachments :	DSEIS-3344_Fuller_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #3344 DETAIL

Submission Date :	11/18/2024
First Name :	Daniel
Last Name :	Fuller
Business/Organization/Agency :	

Submission Input :

The flawed traffic forecasts used by the IBR project are based on misguided assumptions about future travel demand. By exaggerating present traffic volumes, the forecasts hide the *induced* traffic that this project will create through additional travel lanes. A "right-sized" bridge replacement would is congestion by providing alternatives to private automobile use, namely transit and bicycling connections between Oregon and Washington.

IBR Draft SEIS - RECORD #3345 DETAIL

First Name :	Daniel
Last Name :	Fuller
Attachments :	DSEIS-3345_Fuller_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #3345 DETAIL

Submission Date :	11/18/2024
First Name :	Daniel
Last Name :	Fuller
Business/Organization/Agency :	

Submission Input :

The proposed design lacks convenient connections between bicycling, walking, and transit facilities. Transit stops should be directly adjacent to multi-use paths to enable seamless multi-modal trips. This is essential in order to reduce dependency on private automobiles.

IBR Draft SEIS - RECORD #3346 DETAIL

First Name :	Aaron
Last Name :	Kuehn
Attachments :	DSEIS-3346_Kuehn_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #3346 DETAIL

Submission Date : 11/18/2024

First Name : Aaron

Last Name : Kuehn

Business/Organization/Agency :

Submission Input :

Pollutants and emissions from cars, trucks, and freight used on the IBRP facilities will negatively impact the Columbia River, and ecosystems and waterways throughout the project footprint. Sound pollution, light pollution, tire and brake emissions, tailpipe gasses, fluid leaks and spills, and debris are all known to negatively impact fish, birds, humans, and other animals and plants, many that are already endangered. None of these pollutants can be completely contained by the roadway surface. Please consider a cover over the entire project footprint with a filtration system to capture 100% of these known hazardous pollutants, or another system that captures and treats the entirety of the project’s anticipated environmental pollution.

IBR Draft SEIS - RECORD #3347 DETAIL

First Name :	Brandon
Last Name :	Behrman
Attachments :	DSEIS-3347_Behrman_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #3347 DETAIL

Submission Date : 11/18/2024
First Name : Brandon
Last Name : Behrman
Business/Organization/Agency :

Submission Input :

While I like much of the plan as it stands, particularly the access to Tomahawk island without the use of I5, I feel that the current design needs modification before it will draw the active transit and public transit volumes that we would hope for or expect in the long term future.

I'd like to see the recommendations of the JCA applied to the current plan, most notably moving the MAX and bike/pedestrian paths together so that the transit line can provide a barrier from noise, debris, fumes, etc, and so that it is easier to get from transit to the foot/bike paths. Also, it's essential that the pedestrian & bike path has shade, given the expected heat levels around the bridge. To have no sort of shading means nobody will use the bridge in the summer. Adding shading, particularly vegetation, would make it much more pleasant to use the bridge and would be a novel aesthetic that would attract more pedestrian/bike traffic.

Thank you!

IBR Draft SEIS - RECORD #3348 DETAIL

First Name :	Daniel
Last Name :	Fuller
Attachments :	DSEIS-3348_Fuller_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #3348 DETAIL

Submission Date :	11/18/2024
First Name :	Daniel
Last Name :	Fuller
Business/Organization/Agency :	

Submission Input :

This bloated project has ballooned to nearly twice its initial budget. This is yet more evidence that designing for car dependency is fiscally unsustainable. The crossing project should emphasize mass transit and bicycling as the most efficient and environmentally sustainable modes of transportation.

IBR Draft SEIS - RECORD #3349 DETAIL

First Name :	Chris
Last Name :	Erickson
Attachments :	DSEIS-3349_Erickson_Original.pdf (2 kb)

IBR Draft SEIS - RECORD #3349 DETAIL

Submission Date : 11/18/2024
First Name : Chris
Last Name : Erickson
Business/Organization/Agency :

Submission Input :

This comment concerns transit and active transportation matters.

- Light rail transit into Vancouver is an absolute must and I strongly support the current proposal. Light rail is an economic driver and will boost the development and standing of Downtown Vancouver. With the synergy of C-TRAN's Vine routes at the nearby Evergreen Station, it will be a game-changer for Vancouver residents who want to travel into Portland without using a car. LRT is my personal number one priority for this entire project.
- The current access plan for the Waterfront Station is questionable. Let's face facts: elevators are unreliable and frequently break down. Not to mention the inevitable challenge of keeping them clean and sanitary. We need stairs or ramps or escalators. Please consider adding them.
- The current "corkscrew" bike path that goes from the bridge to ground level is quite frankly ridiculous. Yes the bridge is high, but that should not be the only way to get to & from the shared-use path on the bridge. Two options I would like to see explored further. 1) Is there a way to connect the shared-use path with the platform of the Waterfront Station, so bikes can use the elevator to get to the ground floor.? Can an elevator be added directly on the shared-use path? 2) Can there be a bike path that continues all the way to Evergreen Station? We should give people options of where they can enter/exit the bridge path and having another entrance at Evergreen allows for an easier connection to the surrounding community than a single ramp at the waterfront does.
- I love the idea of the community connector at the Evergreen Station. Freeway caps can make these unpleasant roadways just a little better and add much-needed public space back to our cities.
- Any bus improvements are welcome, especially for express bus service and dedicated bus lanes.
- In general, let's build a better city, a better society, and a better transportation environment by elevating the voices of transit, active transportation, persons with disabilities, etc. We can create a more just, equitable transportation system and help correct some of the wrongs of the past.

IBR Draft SEIS - RECORD #3350 DETAIL

First Name :	Ethan
Last Name :	Houston
Attachments :	DSEIS-3350_Houston_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #3350 DETAIL

Submission Date :	11/19/2024
First Name :	Ethan
Last Name :	Houston
Business/Organization/Agency :	

Submission Input :

Put up road signs and even billboards, giving instructions to maintain speed through the bridge. Many drivers slow down because the enclosed bridge gives the illusion that the lanes are more narrow. Then immediately after reaching the other side of the bridge, there is zero traffic. None. Instead of spending $7billion, it would make a lot of sense to attempt to use signage. There should also be many many local ads run, explaining -with video examples- the benefits of leaving extra distance from the car in front of you. It would be a travesty if $7billion were spent and traffic is just as bad. $7billion is too much money when inexpensive signs and public service announcements could be used to change behavior. Most traffic is not a flow rate issue. It is a psychological issue.

IBR Draft SEIS - RECORD #3351 DETAIL

First Name :	Elizabeth
Last Name :	Johnson
Attachments :	DSEIS-3351_Johnson_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #3351 DETAIL

Submission Date :	11/19/2024
First Name :	Elizabeth
Last Name :	Johnson
Business/Organization/Agency :	Resident

Submission Input :

Due to traffic congestion I think it is critical we keep the fire department remain on the island even during construction. Also, please keep in mind that so of us are elderly and low income. Having to pay tolls will affect me and my husband. We have medical conditions that makes it necessary to leave the island multiple times during the day. Sometimes we need to have family come help us and that would be putting a burden on not only us but our family as well. I think being in communication with the residents is very important in this matter.

IBR Draft SEIS - RECORD #3352 DETAIL

First Name :	Linda and Brian
Last Name :	Burright
Attachments :	DSEIS-3352_Burright_Original.pdf (2 mb) BNA_Comment_Water_Access_Point.pdf (2 mb)

IBR Draft SEIS - RECORD #3352 DETAIL

Submission Date :	11/19/2024
First Name :	Linda and Brian
Last Name :	Burright
Business/Organization/Agency :	
Attachments :	BNA_Comment_Water_Access_Point.pdf (2 mb)

Submission Input :

Comment submitted to the Interstate Bridge Replacement Draft SEIS

By Linda and Brian Burright

[redacted]
[redacted]

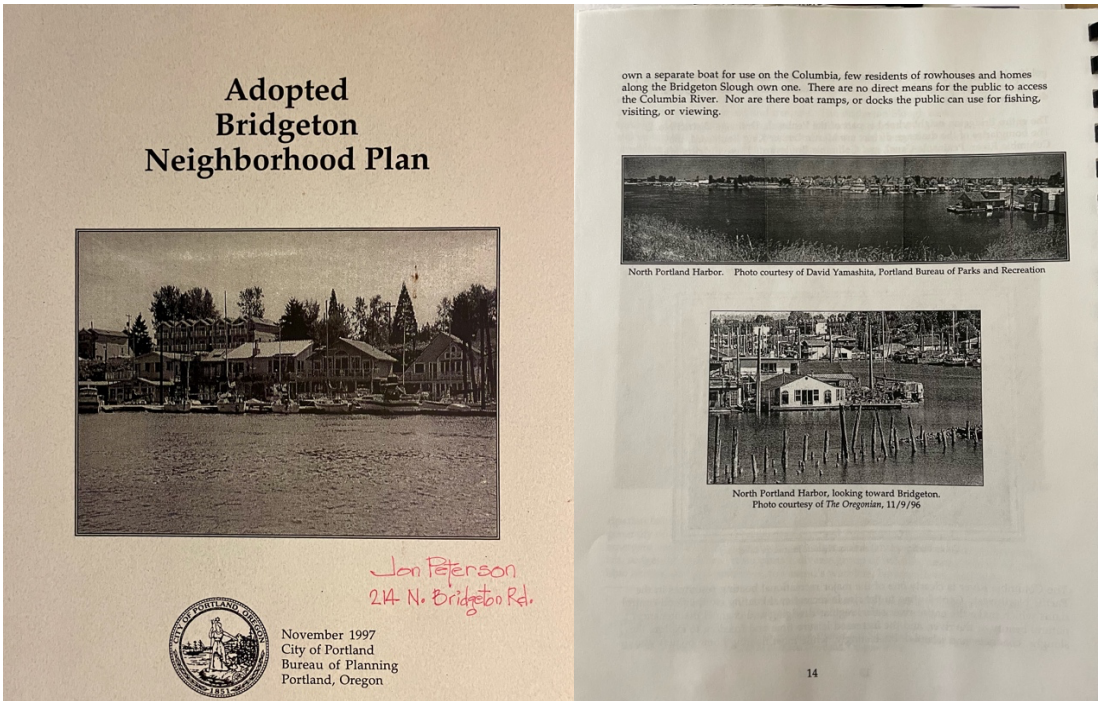
12 November 2024

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

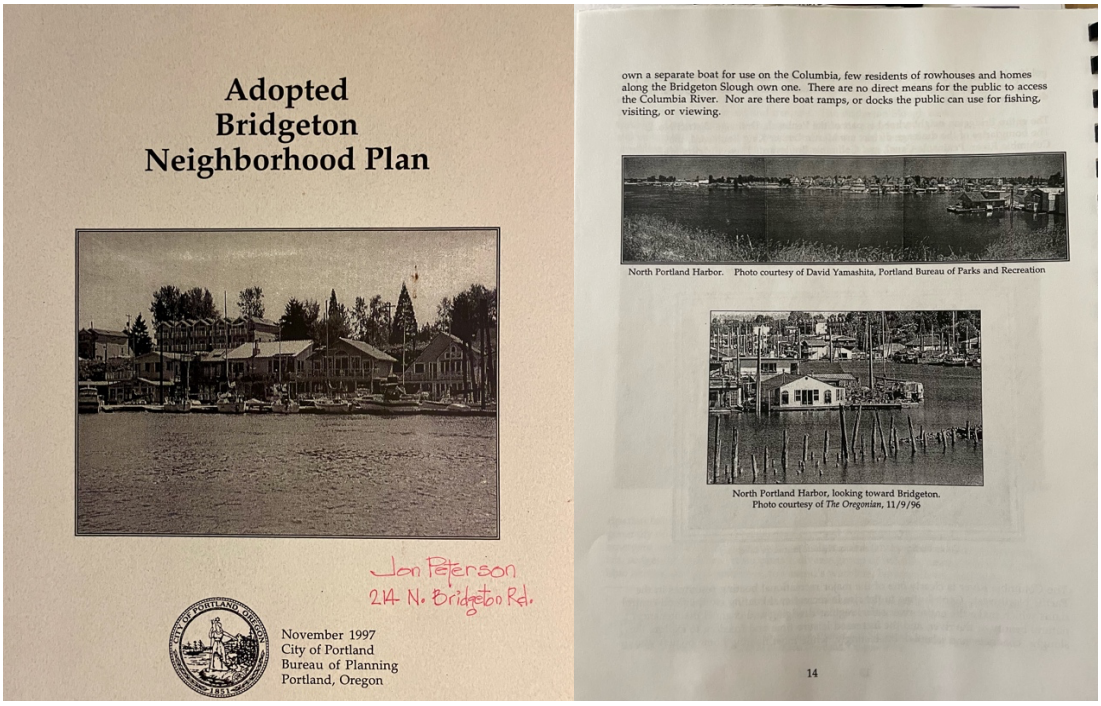
12 November 2024

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

IBR Draft SEIS - RECORD #3353 DETAIL

First Name :	Jane
Last Name :	Wimmer
Attachments :	DSEIS-3353_Wimmer_Original.pdf (8 kb) STOP-IBR-I-5-BRIDGE-Replacement-2.jpg (424 kb)

IBR Draft SEIS - RECORD #3353 DETAIL

Submission Date : 11/18/2024
First Name : Jane
Last Name : Wimmer
Business/Organization/Agency :

Submission Input :

First Name:
Jane

Last Name:
Wimmer

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
There is a need to do something about the I-5 draw bridge to better manage traffic in the Portland, OR and Vancouver, WA area. But the proposed IBR plan is NOT going to help, or provide little improvement. The on/off ramps will be very dangerous during our foggy, black ice winter days. I see what happens when there are accidents on the bridge... the future will likely push those accidents onto the many exit/entrance ramps as they are proposed.
We really need an entirely new bridge; that's what makes sense.

Attachment (maximum one):

STOP-IBR-I-5-BRIDGE-Replacement-2.jpg

JCA comment #: 939

IBR Draft SEIS - RECORD #3355 DETAIL

First Name :	Jeff
Last Name :	Lesh
Attachments :	DSEIS-3355_Lesh_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #3355 DETAIL

Submission Date : 11/18/2024
First Name : Jeff
Last Name : Lesh
Business/Organization/Agency :

Submission Input :

First Name:
Jeff

Last Name:
Lesh

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
The multi-use path needs to extend the full length of this project and connect to current and planned major bike routes and arterials along the way. Cyclists need convenient, efficient connections and should be a main priority of the project.

JCA comment #: 937

IBR Draft SEIS - RECORD #3356 DETAIL

First Name :	Clare
Last Name :	Baxter
Attachments :	DSEIS-3356_Baxter_Original.pdf (195 kb)

IBR Draft SEIS - RECORD #3356 DETAIL

Submission Date :	11/19/2024
First Name :	Clare
Last Name :	Baxter
Business/Organization/Agency :	
Attachments :	Marine Drive Bike Lanes 40.pdf (194 kb)

Submission Input :

Draft SEIS public comment - Marine Drive Bike Lanes

Clare Baxter
Production Management
[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
Clare Baxter
[redacted]

IBR Draft SEIS - RECORD #3358 DETAIL

First Name :	Clare
Last Name :	Baxter
Attachments :	DSEIS-3358_Baxter_Original.pdf (368 kb)

IBR Draft SEIS - RECORD #3358 DETAIL

Submission Date :	11/19/2024
First Name :	Clare
Last Name :	Baxter
Business/Organization/Agency :	
Attachments :	MLK Undercrossing 40.pdf (368 kb)

Submission Input :

MLK Under crossing etc...

Clare Baxter
Production Management
[redacted]

?

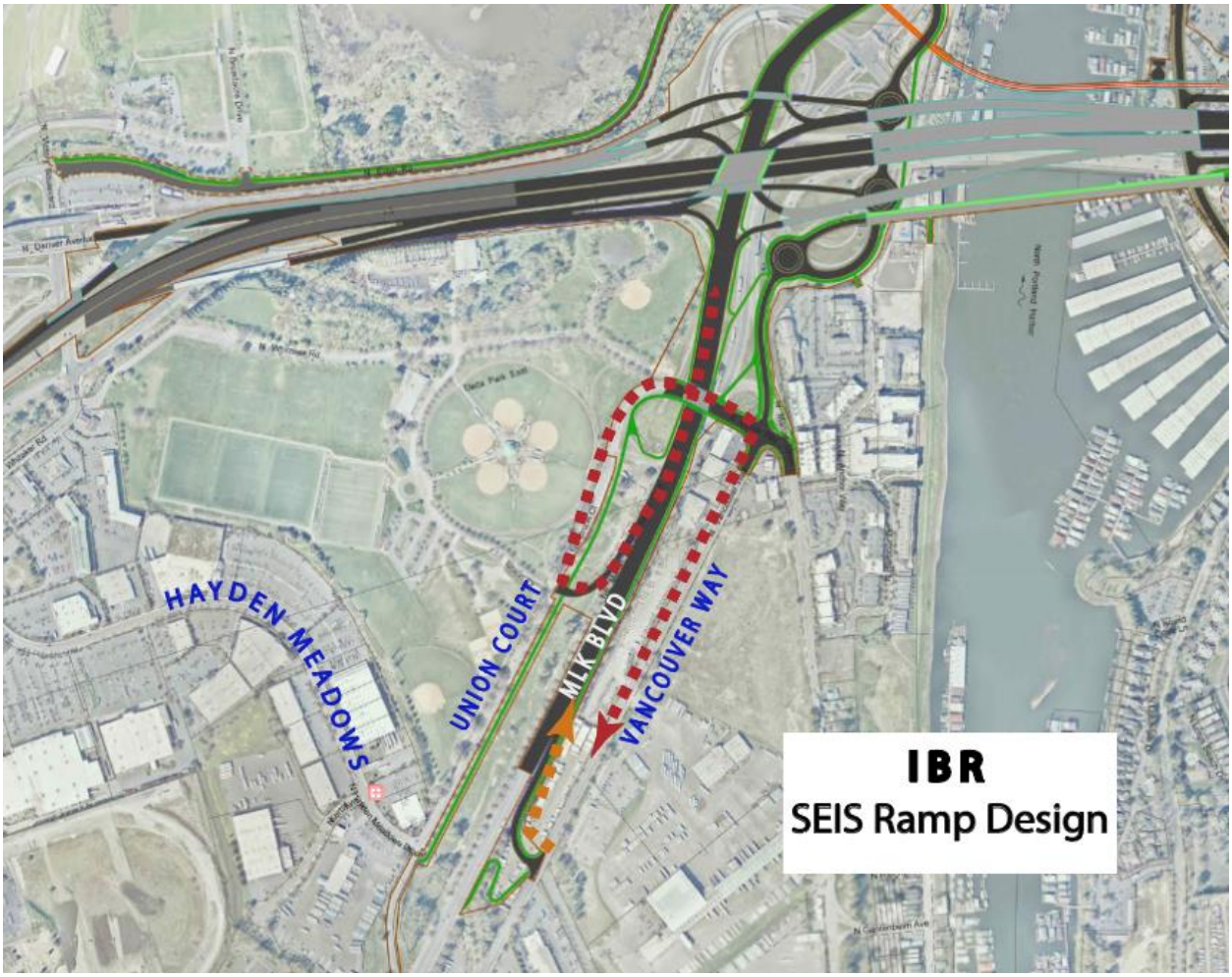
The MLK Undercrossing and Complete Interchange
Better Freight & Neighborhood Access Ramps for the IBR

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
Clare Baxter
[redacted]

IBR Draft SEIS - RECORD #3359 DETAIL

First Name :	Clare
Last Name :	Baxter
Attachments :	DSEIS-3359_Baxter_Original.pdf (222 kb)

IBR Draft SEIS - RECORD #3359 DETAIL

Submission Date :	11/19/2024
First Name :	Clare
Last Name :	Baxter
Business/Organization/Agency :	
Attachments :	Synergies Empowered by the IBR 40.pdf (221 kb)

Submission Input :

Draft SEIS public comment - Synergies Empowered by the IBR

Clare Baxter
Production Management
[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
Clare Baxter
[redacted]

IBR Draft SEIS - RECORD #3360 DETAIL

First Name :	Clare
Last Name :	Baxter
Attachments :	DSEIS-3360_Baxter_Original.pdf (409 kb)

IBR Draft SEIS - RECORD #3360 DETAIL

Submission Date :	11/19/2024
First Name :	Clare
Last Name :	Baxter
Business/Organization/Agency :	
Attachments :	Separating Freight & Bike Travel 40.pdf (408 kb)

Submission Input :

Draft SEIS public comment - Freight and Bike traffic

Clare Baxter
Production Management
[redacted]

?

Separating Freight and Bike Travel
on the Marine Drive Interchange and On-Ramps

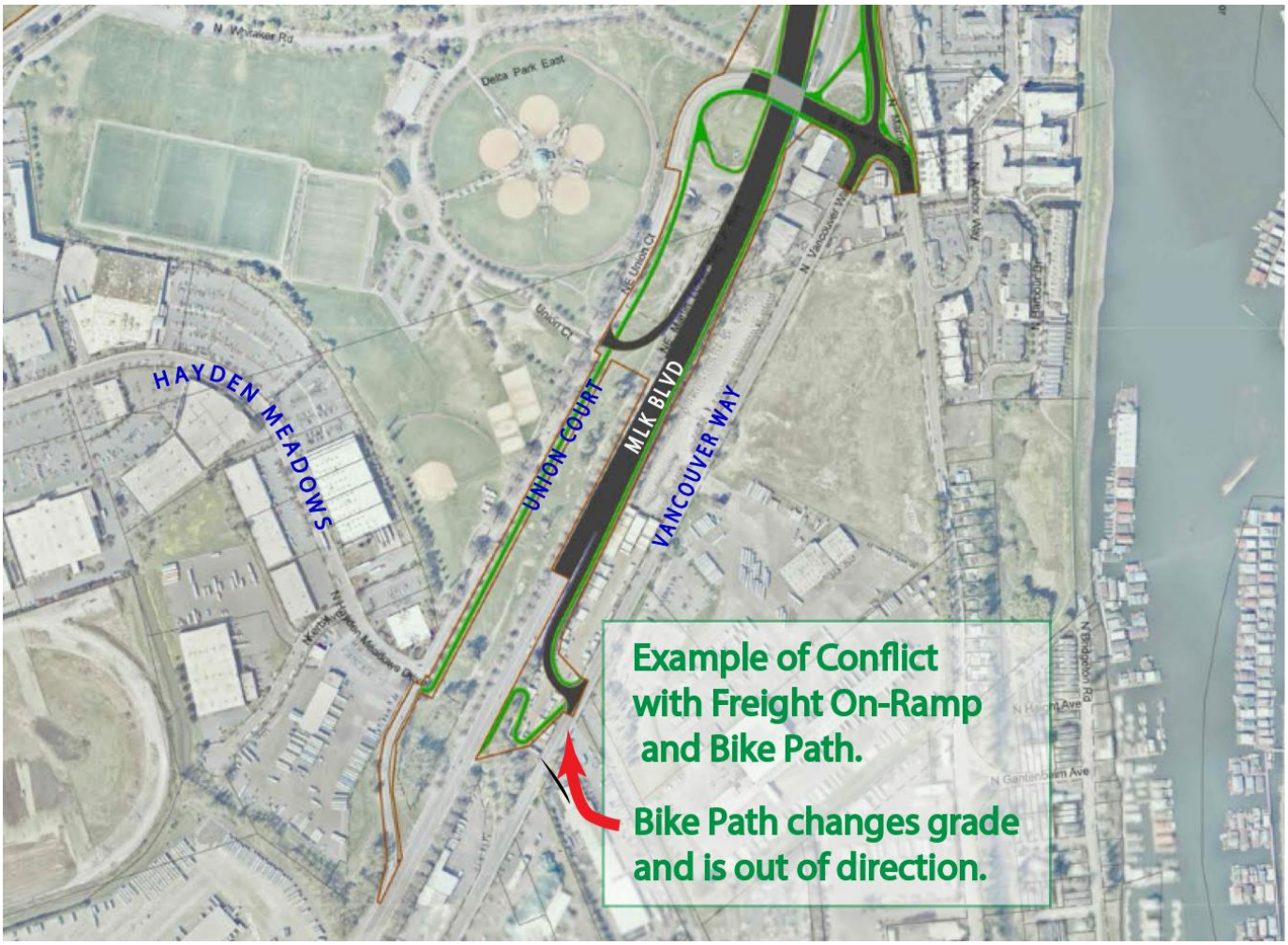
One important purpose and need of the IBR is to (c) improve highway freight mobility and address interstate travel and commerce needs in the Program area.

Another important purpose and need is to (b) improve connectivity, reliability, travel times, and operations of public transportation modal alternatives in the Program area.

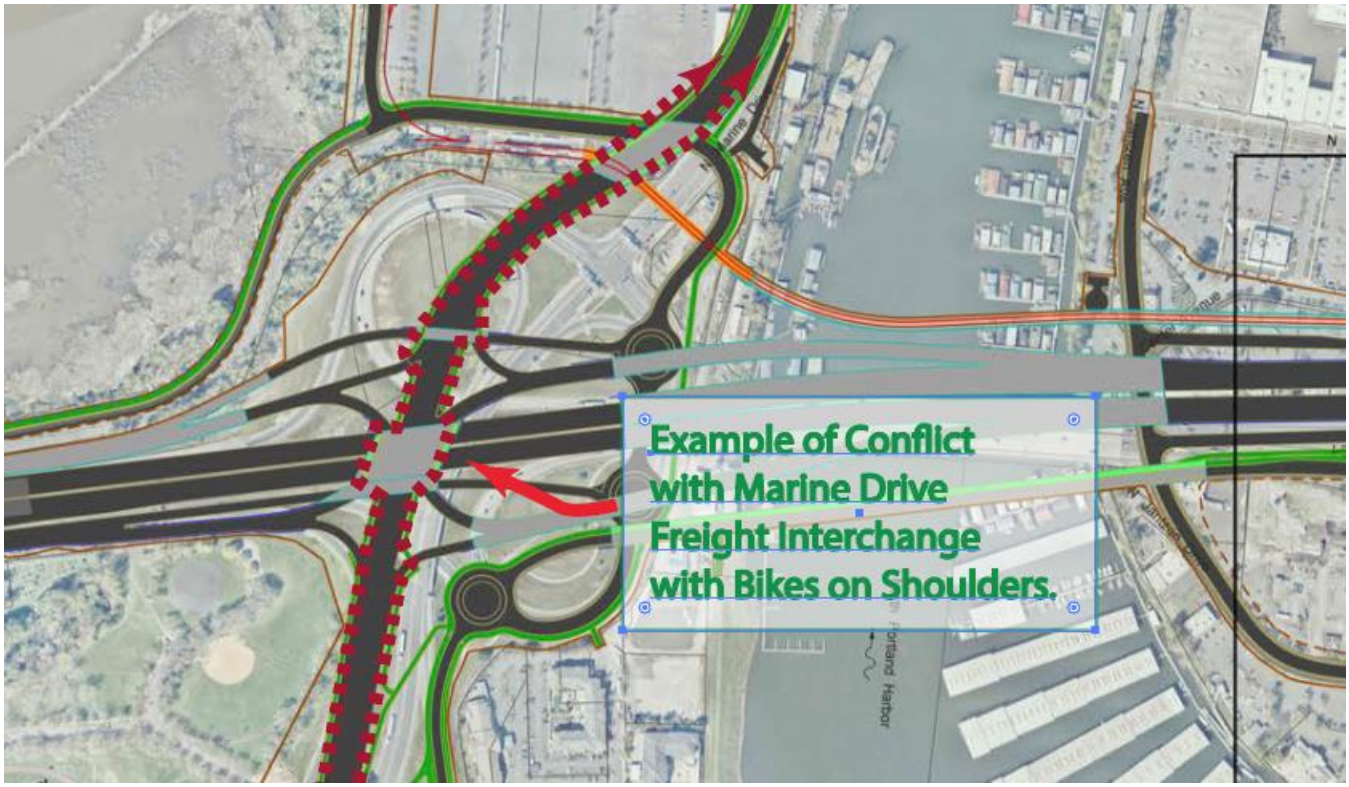
A way to meet the purpose and needs of both Freight Users and Active Transportation Users is to build active transportation routes physically separated from Freight routes as much as possible. Maximizing this separation is key to creating efficient Freight routes while creating safer, more attractive, 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
Clare Baxter
[redacted]

IBR Draft SEIS - RECORD #3361 DETAIL

First Name :	Gary
Last Name :	Clark
Attachments :	DSEIS-3361_Clark_Original.pdf (5 kb) Say-No-to-the-IBRP-1.jpg (424 kb)

IBR Draft SEIS - RECORD #3361 DETAIL

Submission Date :	11/18/2024
First Name :	Gary
Last Name :	Clark
Business/Organization/Agency :	Hayden Island Community Safety Iniative
Attachments :	DSEIS-Clark_3361_20241118_Original.pdf (2 kb)

Submission Input :

First Name:
Gary

Last Name:
Clark

Business or Organization:
[redacted]

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
I and our Hayden Island Community Safety Initiative organization are opposed to the monstrous IBRP bridge designs, and we will fight to stop it. The $7-$12 billion cost and 15 years to build will be a huge economic hardship on all of us. On top of that, you're imposing tolls each way, which is a huge issue for all of us on Hayden Island. We want a far less costly bridge that takes far less time to construct! about 40% of those of us that live on the island are retired living on fixed incomes. You have to stop and think about them!!!

Attachment (maximum one):
Say-No-to-the-IBRP-1.jpg

JCA comment #: 935

IBR Draft SEIS - RECORD #3362 DETAIL

First Name :	Jeff
Last Name :	Lesh
Attachments :	DSEIS-3362_Lesh_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #3362 DETAIL

Submission Date : 11/18/2024
First Name : Jeff
Last Name : Lesh
Business/Organization/Agency :

Submission Input :

First Name:
Jeff

Last Name:
Lesh

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
The non-automobile and truck transportation modes need to be more fully considered. Please make the trains and multi-use path adjacent to each other so that users can easily switch between modes. I'm concerned that such a simple comment is needed. Who is designing this thing?

JCA comment #: 934

IBR Draft SEIS - RECORD #3363 DETAIL

First Name :	Clare
Last Name :	Baxter
Attachments :	DSEIS-3363_Baxter_Original.pdf (199 kb)

IBR Draft SEIS - RECORD #3363 DETAIL

Submission Date :	11/19/2024
First Name :	Clare
Last Name :	Baxter
Business/Organization/Agency :	
Attachments :	The Vancouver Dip 40.pdf (197 kb)

Submission Input :

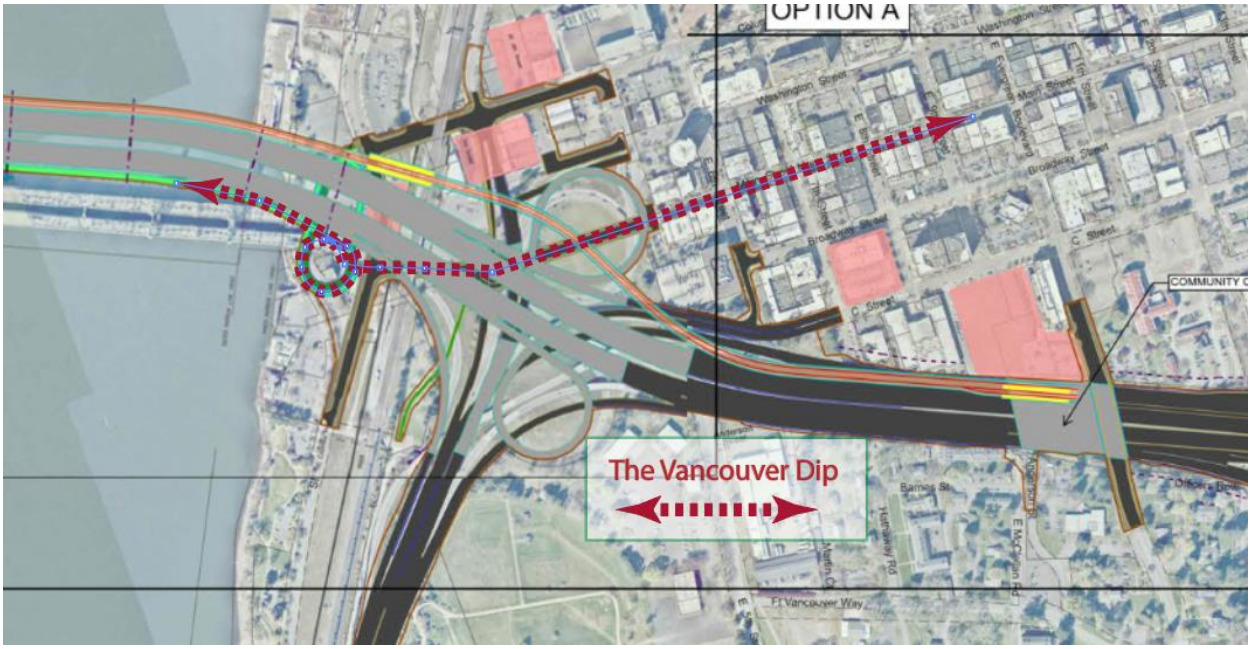
Draft SEIS public comment

Clare Baxter
Production Management
[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. 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
Clare Baxter
[redacted]

IBR Draft SEIS - RECORD #3364 DETAIL

First Name :	Clare
Last Name :	Baxter
Attachments :	DSEIS-3364_Baxter_Original.pdf (126 kb)

IBR Draft SEIS - RECORD #3364 DETAIL

Submission Date :	11/19/2024
First Name :	Clare
Last Name :	Baxter
Business/Organization/Agency :	
Attachments :	Comments Bridge Architecture 40.pdf (130 kb)

Submission Input :

Draft SEIS public comment- Architectural Design

Clare Baxter
Production Management
[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
Clare Baxter
[redacted]

IBR Draft SEIS - RECORD #3365 DETAIL

First Name :	Clare
Last Name :	Baxter
Attachments :	DSEIS-3365_Baxter_Original.pdf (354 kb)

IBR Draft SEIS - RECORD #3365 DETAIL

Submission Date :	11/19/2024
First Name :	Clare
Last Name :	Baxter
Business/Organization/Agency :	
Attachments :	The 40 Mile Loop Connections 40.pdf (359 kb)

Submission Input :

Draft SEIS public comment 40 mile loop

Clare Baxter
Production Management
[redacted]

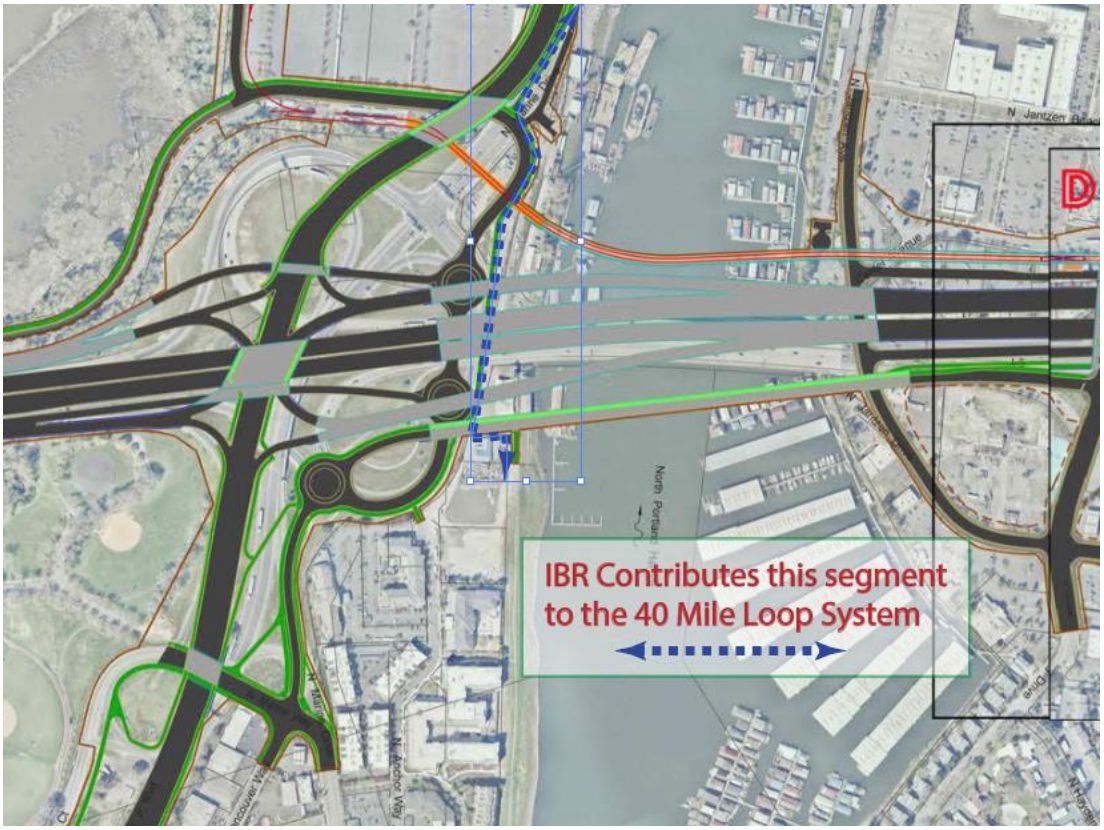
Comments on IBR Multi-Use path connections
to the 40-Mile Loop East/West Corridor

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.

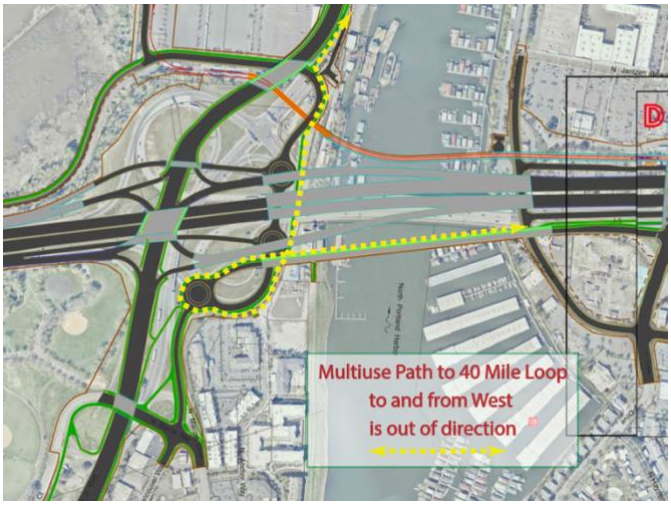
IBR Positive Contributions to the 40-Mile Loop Trail

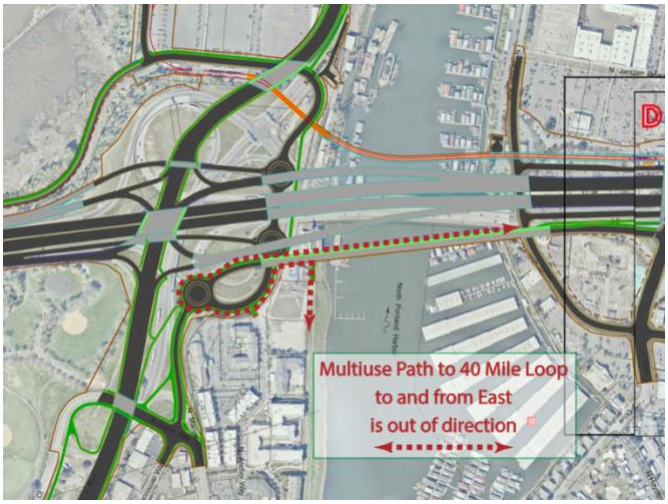
The IBR project will construct the segment of the 40-Mile Loop within the project area. This new trail segment will provide a safe, separated trail connecting the existing 40-Mile Loop trail located west of the proposed bridges through the project area, under the many new IBR bridges emanating from mainland 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
Clare Baxter
[redacted]

IBR Draft SEIS - RECORD #3366 DETAIL

First Name :	Clare
Last Name :	Baxter
Attachments :	DSEIS-3366_Baxter_Original.pdf (263 kb)

IBR Draft SEIS - RECORD #3366 DETAIL

Submission Date :	11/19/2024
First Name :	Clare
Last Name :	Baxter
Business/Organization/Agency :	
Attachments :	West Side Mulituse Path 40.pdf (267 kb)

Submission Input :

Draft SEIS public comment

?

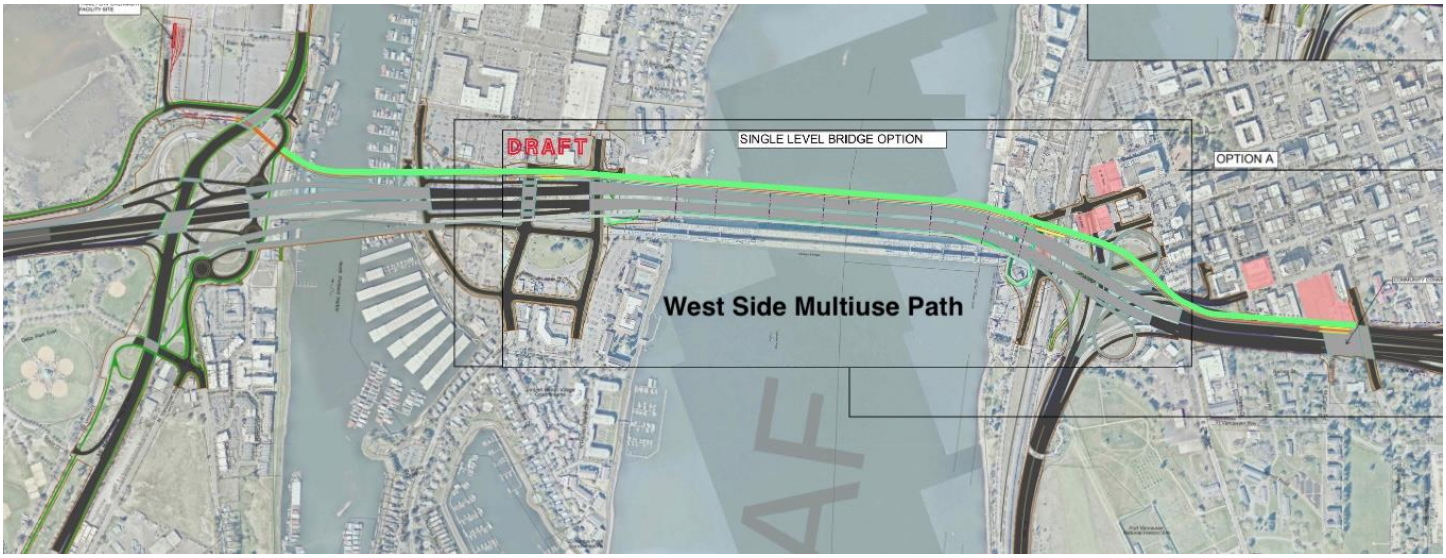
Clare Baxter
Production Management
[redacted]

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
Clare Baxter
[redacted]

IBR Draft SEIS - RECORD #3367 DETAIL

First Name :	Gary
Last Name :	Clark
Attachments :	127350_DSEISClark_3367_20241118_Original_Redacted.pdf (4 kb) Say-No-to-the-IBRP.jpg (424 kb)

IBR Draft SEIS - RECORD #3367 DETAIL

Submission Date :	11/18/2024
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:
While I want a bridge replacement, I do not want the monster the IBRP is proposing. Economic conditions are

tight, and the IBRP is proposing a $7-12 billion dollar giant?? Where's the logic in that? The $7-12 billion cost and the 15 years to build is outrageous, while doing little to solve I-5 traffic congestion at the I-5 bridge. and it will create an economic hardship on all adjacent communities.

Attachment (maximum one):
Say-No-to-the-IBRP.jpg

JCA comment #: 933

IBR Draft SEIS - RECORD #3368 DETAIL

First Name :	Kallista
Last Name :	Mason
Attachments :	DSEIS-3368_Mason_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #3368 DETAIL

Submission Date : 11/18/2024
First Name : Kallista
Last Name : Mason
Business/Organization/Agency :

Submission Input :

First Name:
Kallista

Last Name:
Mason

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
Portland is an amazing city, and one of the reasons it is is due to all the alternate ways to get around the city. Portland is one of the few cities in the US that is close to being a 15 minute walkable city. Constantly people are choosing to bike or take public transportation instead of driving. In an era of extreme weather events because of climate change, we should be investing in more green infrastructure. Building out the highway does not fix traffic and often just adds to the problem. Let's take the chance to allocate the funds to continue

expanding public transportation and adding more bike lanes. Let's keep our air clean and noise pollution down.

JCA comment #: 932

IBR Draft SEIS - RECORD #3369 DETAIL

First Name :	Ed
Last Name :	Norris
Attachments :	DSEIS_3369_Norris_Original.pdf (52 kb)

IBR Draft SEIS - RECORD #3369 DETAIL

Submission Date : 11/18/2024
First Name : Ed
Last Name : Norris
Business/Organization/Agency :

Submission Input :

First Name:
Ed

Last Name:
Norris

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
This bridge will be around for a long time and should reflect how we view the future. If that view is "business as usual" or "hey, it's still the 1970's" or even "we have transportation data but we don't want to acknowledge it" then sure, build a structure oriented towards motorized vehicles and build a lot of traffic lanes, saddling generations hence with a boondoggle.
If we care about the future and the environment, then we should be building a bridge that reflects those

priorities - not only mass transit and cycling but implemented in a way that respects the people who choose to travel that way. A hundred foot elevation change to get off of the bridge? Bikes and transit on opposite sides of the bridge? Why not just slap us in the face - it's a lot cheaper.

JCA comment #: 931

IBR Draft SEIS - RECORD #3370 DETAIL

First Name :	Jane
Last Name :	Wimmer
Attachments :	3370_Original.pdf (51 kb) STOP-IBR-I-5-BRIDGE-Replacement.jpg (424 kb)

IBR Draft SEIS - RECORD #3370 DETAIL

Submission Date : 11/18/2024
First Name : Jane
Last Name : Wimmer
Business/Organization/Agency :

Submission Input :

First Name:
Jane

Last Name:
Wimmer

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
I am against the IBR Bridge Designs. Please stop the funding and proposal now.

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 will impose a heavy and daily financial burden on all adjacent communities, especially residents on Hayden Island

Attachment (maximum one):
STOP-IBR-I-5-BRIDGE-Replacement.jpg

JCA comment #: 930

IBR Draft SEIS - RECORD #3371 DETAIL

First Name :	Susan
Last Name :	Haywood
Attachments :	DSEIS_3371_Haywood_Original.pdf (4 kb)

IBR Draft SEIS - RECORD #3371 DETAIL

Submission Date :	11/18/2024
First Name :	Susan
Last Name :	Haywood
Business/Organization/Agency :	property development

Submission Input :

First Name:
Susan

Last Name:
Haywood

Business or Organization:
[redacted]

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
There is no need to expand the freeway portion of the I-5 Bridge. Let's provide pedestrian access as does the Golden Gate Bridge in the San Francisco Bay.
Adding light rail would help with the goal of getting people out of their cars.
We don't need a $7B megalith or more lanes of freeway.
Keep it simple and utilitarian.

Thank you.

JCA comment #: 929

IBR Draft SEIS - RECORD #3372 DETAIL

First Name :	Will
Last Name :	Hollingsworth
Attachments :	DSEIS_3372_Hollingsworth_Original.pdf (4 kb)

IBR Draft SEIS - RECORD #3372 DETAIL

Submission Date : 11/18/2024
First Name : Will
Last Name : Hollingsworth
Business/Organization/Agency :

Submission Input :

First Name:
Will

Last Name:
Hollingsworth

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
This project poorly serves the transportation needs of our communities, and particularly those of Portland. By its own modelling, the project will increase congestion between Marine Drive and the I405/I5 interchange. This seems to be drive in large part by freeway expansions far from the bridge itself, at E Mill Plain, 4th Plain, and SR-500 in Washington. The project should be re-scoped to remove freeway projects beyond the bridgehead at SR-14 in Washington, and the bridge should not be built with the expectation that those projects will be

completed. Moreover, no freeway ingress or egress should be allowed on Hayden Island. The local bridge from the Island to Oregon should be maintained.

JCA comment #: 928

IBR Draft SEIS - RECORD #3373 DETAIL

First Name :	Cameron
Last Name :	Bennett
Attachments :	DSEIS_3373_Bennett_Original.pdf (5 kb)

IBR Draft SEIS - RECORD #3373 DETAIL

Submission Date : 11/18/2024
First Name : Cameron
Last Name : Bennett
Business/Organization/Agency :

Submission Input :

First Name:
Cameron

Last Name:
Bennett

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
I am a lifelong Portland resident who uses transit, bicycles, and private vehicles to get around. I use the I-5 bridge to travel out of town and to access goods and services in Vancouver. I am a transportation consultant with a master's degree in civil engineering and transportation planning.

While I am excited to see that active transportation access will be enhanced with the locally preferred

alternative, I have a number of concerns.
1. Active transportation users should be located away from vehicle traffic. Highways are noisy, dangerous, and polluting. Siting a shared use path near lanes of travel ensures that using the facility will be unpleasant and unhealthy for people walking and biking.
2. Active transportation users should have easy access to transit. Site the multi-use path near the transit corridor, allowing for easy access to and from transit stops, and easy use of the elevators at these stops.
3. Size elevators to accommodate cargo bikes. This form of transportation is being adopted in droves in Portland and Vancouver; accommodating longer bicycles on the elevator is essential to making them accessible to all users.
4. Current designs require significant out of direction travel both in terms of distance and grade. The MUP should be lowered. If not, elevators should be made available at multiple ground-level access points on both sides of the bridge.
5. Single occupancy vehicle drivers experience little to no out of direction travel while active transportation users in and out of Vancouver experience an additional one mile of out of direction travel each time they navigate the Vancouver Dip. This is inequitable.

JCA comment #: 927

IBR Draft SEIS - RECORD #3374 DETAIL

First Name :	Cameron
Last Name :	Bennett
Attachments :	DSEIS_3374_Bennett_Original.pdf (5 kb)

IBR Draft SEIS - RECORD #3374 DETAIL

Submission Date : 11/18/2024
First Name : Cameron
Last Name : Bennett
Business/Organization/Agency :

Submission Input :

First Name:
Cameron

Last Name:
Bennett

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Cumulative Effects

Comment:
I am a lifelong Portland resident who uses transit, bicycles, and private vehicles to get around. I use the I-5 bridge to travel out of town and to access goods and services in Vancouver. I am a transportation consultant with a master's degree in civil engineering and transportation planning.

We need a new bridge. We need transit, pedestrian, and bicycle connectivity over the river. We do not need

(and, in fact, do not want) freeway capacity expansion.

The IBR project is an essential lifeline for the west coast. We need a seismically resilient replacement to prepare for the Cascadia subduction earthquake. The addition of safe and comfortable bicycle and pedestrian access and extended transit service north of the river will be very welcome changes.

Adding auxiliary lanes and performing other capacity enhancements beyond the extent of the bridge is a gross misuse of taxpayer dollars. Please do not sink future generations in my state further into debt to cater to the needs of exurban automobile commuters.

Adding vehicle capacity is not consistent with any climate planning efforts. Modern vehicles are not meaningfully less efficient at slow speeds; reducing stop and go traffic does not really help GHG. VMT is the primary contributor to transportation sector emissions, and should be reduced as a central effort in all our transportation projects.

Streamline the project to focus on just the core needs: seismic resilience, transit service extension, and bike/ped access. DO NOT add vehicle throughput capacity at the bridge. DO NOT perform highway work beyond the bridge.

JCA comment #: 926

IBR Draft SEIS - RECORD #3375 DETAIL

First Name :	Clare
Last Name :	Baxter
Attachments :	DSEIS_3375_Baxter_Original.pdf (9 kb) page1image60231952.jpeg (68 kb)

IBR Draft SEIS - RECORD #3375 DETAIL

Submission Date : 11/19/2024
First Name : Clare
Last Name : Baxter
Business/Organization/Agency :

Submission Input :

The IBR proposes building the light rail line on the south bound main bridge and the mul6use path on the north bound main bridge span. The IBR proposal makes each system separate from each other. The IBR proposal makes connec6ons between these two systems difficult and inefficient for transit and ac6ve transporta6on users.

The IBR proposal has stairs and elevators providing connec6ons for transit users but the stairs and elevators are not usable for users of the mul6-use path. The mul6-use path has ramp connec6ons for users that are not usable for transit riders. Though these two systems are parallel to each other, but they are en6rely separated systems. These systems do not connect easily even though ac6ve transporta6on users want to connect to transit.

We believe addi6onal study is needed to connect these two systems together. People who are not driving to their des6na6on, a goal of the IBR, will oCen use several modes to reach their des6na6on. Users may ride their bikes to a light rail sta6on, 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 en6rely separate light rail and mul6use path makes these blended trips difficult.

?
One idea that needs to be studied more is to build the mul6use path next to the light rail alignment on the south bound main bridge. Compared to the mul6use path on the east side of the main bridge, the mul6use path on the west side next to the light rail alignment beIer meets the purpose and needs statement for the IBR to (b) improve connec6vity, reliability, travel 6mes, and opera6ons of public transporta6on modal alterna6ves in the Program area. The west side alignment provides the following improvements:

• Seamless Transi6on: Users should easily switch between transit and ac6ve transporta6on at any sta6on, with no grade changes or distance barriers.

• Shared Elevator Access: Allowing ac6ve transporta6on users to share transit sta6on elevators eliminates the need for addi6onal infrastructure, making the design more efficient and accessible.

•Createsreductantwaystoconnecttobothtransitandmul6usepath: Iftheelevatorisnotworking,users can use the ramp or stairs. User not able to nego6ate going up the long ramps can use the elevator. Bike users who get a flat 6re on the mul6use path can connect to the light rail sta6on and s6ll get to their des6na6on.

• Provides Eyes on the Path: Transit operators and passengers provide a con6nuous presence, reducing the isola6on felt on a mul6-use path and enhancing safety and comfort.

• BeIer Emergency Egress: The mul6-use path should double as an emergency exit route for the transit way,

suppor6ng user safety during unexpected events.

• Inclusive Design Principles: These principles ensure the accessibility and usability of both transit and ac6ve transporta6on facili6es for individuals of all abili6es.

• By building the mul6use path on the west side of the light rail trackway provides greater separa6on from vehicle noise and would offer a more pleasant experience for ac6ve transporta6on users compared to a mul6use path on the east side immediately next to vehicle travel.

• If the mul6use path was built next to the light rail line on the light rail bridge crossing North Portland Harbor, then the mul6use path connec6on to the 40 Mile loops would be direct rather than out of direc6on when the mul6use path is on the local Harbor Bridge.

Regarding Views: There is a good view of Mt Hood if the mul6use path in on the east side of the north bound main bridge, however there is a good view to the west too. Addi6onally, a quality view of North Portland Harbor and Mt Hood views could be experienced on the local harbor bridge, but the IBR proposes the mul6use 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.

Draft SEIS public comment

Thank you,

Clare Baxter
Production Management
[redacted]

IBR Draft SEIS - RECORD #3376 DETAIL

First Name :	Camilla
Last Name :	Palmer
Attachments :	DSEIS_3376_Palmer_Original.pdf (4 kb)

IBR Draft SEIS - RECORD #3376 DETAIL

Submission Date :	11/18/2024
First Name :	Camilla
Last Name :	Palmer
Business/Organization/Agency :	Portland State University

Submission Input :

First Name:
Camilla

Last Name:
Palmer

Business or Organization:
[redacted]

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Induced Demand

Comment:
Priority should be given to bikers, pedestrians, and public transit. Cars are dangerous, selfish, and

unsustainable. Investing in car infrastructure over sustainable modes of transit is irresponsible, and leads to more traffic, pollution, noise, urban sprawl, and loneliness.

JCA comment #: 925

IBR Draft SEIS - RECORD #3377 DETAIL

First Name :	Cameron
Last Name :	Bennett
Attachments :	DSEIS_3377_Bennett_Original.pdf (5 kb)

IBR Draft SEIS - RECORD #3377 DETAIL

Submission Date : 11/18/2024
First Name : Cameron
Last Name : Bennett
Business/Organization/Agency :

Submission Input :

First Name:
Cameron

Last Name:
Bennett

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Induced Demand

Comment:
I am a lifelong Portland resident who uses transit, bicycles, and private vehicles to get around. I use the I-5 bridge to travel out of town and to access goods and services in Vancouver. I am a transportation consultant with a master's degree in civil engineering and transportation planning.

I am concerned about the effect of induced demand from capacity enhancement. We know from countless

examples that adding vehicle capacity induces land use changes that bring more traffic, ultimately resulting is worse congestion, more VMT, and more emissions. Not incorporating this dynamic in the modeling for this project is irresponsible and misleading. This approach does not represent reality or the best interests of the communities the project serves; it only seeks to line the pockets of the consultants and agencies involved on the project team.

Added freeway capacity will induce more development north of the river for commuters driving into Portland. These drivers will adversely affect my way of life by adding more vehicle miles traveled to the system in Portland. More cars on the roads mean worse safety, livability, and environmental outcomes for my community.

The growth in background traffic at the bridge also represents a failure to recognize that the current bridge project is constrained. This is an overly simplistic approach, which is wildly irresponsible for a project of this size and importance.

JCA comment #: 924

IBR Draft SEIS - RECORD #3379 DETAIL

First Name :	Dean
Last Name :	Suhr
Attachments :	DSEIS-3379_Suhr_Original.pdf (11 kb)

IBR Draft SEIS - RECORD #3379 DETAIL

Submission Date : 11/19/2024
First Name : Dean
Last Name : Suhr
Business/Organization/Agency :

Submission Input :

My name is Dean Suhr. I am a Oregon resident and President and founder of both the Vote Before Tolls Committee and the Vote Before Tolls Foundation.

Vote Before Tolls Committee represents a broad cross-section of the Oregon community that expects to first be impacted by tolls.

?We need good, efficient, cost-effective transportation for the general public, freight, and emergency services. We absolutely agree that a replacement bridge is necessary, and we know we need to pay for it. But we don't want the current politicians' boondoggles that cost more than we can afford without solving today's and the future problems of efficient transportation. $9B to replace three narrow lanes with wider lanes is a $2.54M per foot boondoggle.

Common sense needs to prevail. The public demands a seat at the table to be involved in re-focusing reigning in this project. It's our bridge, our cash, our table, our commutes, our freight, and frankly, our bridge!?

The Environmental study and response needs to include the policy landscape. IP-31, a citizen-driven Oregon Constitutional Amendment, gives voters the right to vote before all new tolls ... forcing accountability by ODOT, PBOT, Ti-MET, and our state legislators.? It is retractive and covers all bridges, roads, and highways. It covers tolls affecting all vehicles and forms of transport – cars, motorcycles, trucks, and even bicycles who think they will never be charged for their infrastructure. It is retroactive, covering all tolls starting after 2017. The taxpaying voters in Oregon are fed up with the state leadership's spend, spend, spend philosophy, and when IP-31 passes on the 2026 ballot, the funding for projects planning on tolling will be at risk. In fact, the funding is at risk now. The Oregon legislature leadership shut down all discussions about tolling during last year's session and are on a path to do the same in 2025. ????-???? ???????? ???????? ???????? ???? ????????????????????????????? for their many multi-billion dollar tolling spending sprees including the IBR, Abernethy Bridge, Rose Quarter, Hwy 217, and Hwy 26 tolling proposals – and any others that come up.?
?

Our concerns are as follows:

1) Washington's Good To Go tolling infrastructure is not compatible with EZ-Pass, the system used by nearly all of the rest of the nation. From the beginning, the tolling infrastructure needs to be integrated with EZ-Pass.

2) The $???? ??-?? ???????????? ???????????????? $??.???? ???? ??????????? as a default funding source. The cost of the bridge is spiraling out of control. Just 11 months ago, in December 2023, IBR project director Greg Johnson told us the bridge would cost $6B. ??????????'?? ???????????????? ???? $???? and rising. While we admit construction costs are up - they are not up 50% in just ONE year!?
?
3) Less than half the funding is already lined up. Oregon, Washington, and the Federal government have already contributed billions. The extraordinary and growing balance cannot simply default to tolling.

4) The tolls are being placed squarely on the backs and from the wallets of those who cross the bridge. The toll share was $1.5B last year, now ????????????'?? ?????????? ???? ???? ??????% ???? $??.???? and tolls will continue to be the "subtract answer" plugging the funding gap as project costs continue to rise.?
?
5) Tolls are currently estimated to peak at ???????? ???????? $?? ????????????? ?? ?????? ???? ???????? ???????? $??,?????? ?? ???????? for a daily commuter. This is simply unaffordable for the average commuter. This is out of control, not equitable, and not reasonable. Many of those commuting cannot shift their schedules to adjust to congestion pricing.

6) The bridge rebuild appropriately increases earthquake resilience, but it only adds a few inches of lane width but NO MORE vehicle capacity.?
-> The replacement bridge is planned to have 3 lanes north and south, the same as it did when the second span was opened 6 years ago in 1958. Auxiliary lanes will reduce congestion due to merging and provide temporary relief but do not add to the overall capacity of the bridge.
-> Spending $9B+ for a bridge that is already out of capacity and certainly will not handle another 66 years of regional growth is absurd. Does any politician or transportation leader think traffic will decline or the PNW region will not grow over the next 66 years?
-> Adding one more lane, or at least making sure the pilings are designed to support at least one more future lane in each direction now, would be an incremental cost and will somewhat future-proof the bridge.?
?
7) The tolls will not sunset (stop) when construction costs are paid off – they will continue forever.? This makes tolling not just a capital source

but also a statewide transportation revenue source. Not just project funding but a new perpetual tax. That makes the IBR with tolling much more than just a bridge project.
?
8) At $1 billion a mile, light rail is the most expensive light rail project on earth! Our leaders want us to pay $2 billion for this expansion and then subsidize the fares of the travelers PLUS the ongoing maintenance/operation of the bridge for their portion of their travels since they won't be paying tolls or fully loaded MAX fares!
-> This is a major cost add-on to the project that does not improve the primary function of the bridge, which is the efficient transport of vehicles and freight.
-> The general public in SW Washington and those of us in Oregon don't want this expansion ... and we can't afford it.?
-> Metro already owns the Expo Center - I am sure we can triple the parking lot size there and add C-Tran busses to accommodate the few hundred riders who would use the Vancouver Max extension for less than a $1M per year ... 1/200 of the cost of extended light rail!
-> Light rail needs to be stand alone future project.?
?
9) Bridge tolls are planned to start before the actual bridge construction starts. It's not clear that the Glenn Jackson I-205 bridge will be tolled. The I-205 bridge tolling plan needs to be in place when I-5 tolls start, or a significant portion of the I-5 bridge traffic will move to the I-205 bridge. This will negatively impact the I-5 bridge toll collections and negatively impact I-205 bridge traffic, PDX airport traffic, and the PDX regional businesses, which are very retail and wholesale/freight oriented.
?
10) ODOT, PBT, and our Legislators still have plans to toll I-5, I-205, Hwy 26, and Hwy 217 for “congestion relief”. More tolls will surely follow.? The IBR tolling needs to be coordinated with the other regional tolling plans.

11) The IBR planners are allowing the general public and public officials to speak, but it is not clear they are hearing the concerns. There is no active feedback or interactive, collaborative discussion.
-> But to ODOT's credit, they do count every public comment as a "citizen contact" when they report their engagement numbers.

If my children only listened but did not hear, and certainly if they did not respond and interact when I provided feedback, there would be consequences. IP-31 is a consequence of this behavior by Oregon transportation and legislative leadership.

A day of reckoning will come on November 3rd, 2026. Please do not forget that all of you – elected, appointed, or hired – work for us; it is our money, and these are our highways and bridges.

Best Regards,

Dean

—

Dean Suhr
President, Vote Before Tolls Committee, Vote Before Tolls Foundation
Author & Chief Petitioner of IP-31, the Vote Before Tolls initiative

[redacted] desk, also rings my mobile (no texts)
mobile: [redacted]

*Learn more and sign up to be kept up to date: https://VoteBeforeTolls.org <https://votebeforetolls.org/> *

Please return petitions to *[redacted]*

FaceBook: https://VoteBeforeTolls.org/FaceBook/ <https://votebeforetolls.org/FaceBook>

*NextDoor *– No Toll Army group: https://VoteBeforeTolls.org/NextDoor <https://votebeforetolls.org/NextDoor>

IBR Draft SEIS - RECORD #3380 DETAIL

First Name :	Alyssa
Last Name :	V
Attachments :	DSEIS_3380_V_Original.pdf (3 kb)

IBR Draft SEIS - RECORD #3380 DETAIL

Submission Date :	11/18/2024
First Name :	Alyssa
Last Name :	V
Business/Organization/Agency :	

Submission Input :

First Name:
Alyssa

Last Name:
V

Email:
[redacted]

Topic Area:
Climate Change

Comment:
I am opposed to the current design of the bridge because I do not feel it will do enough to mitigate risks related to the climate crisis. Specifically the bridge will not promote reduced traffic, and it does not include sufficient considerations for public transit—an essential planning considerations. The bridge should include stations to support four-car trains now. In addition the plan should be forecasting for even higher-capacity transit systems, such as Bus Rapid Transit or heavy rail, beyond 2045. This is a critical moment to be planning for our future—we can no longer put off today's problems for future generations to deal with.

JCA comment #: 923

IBR Draft SEIS - RECORD #3381 DETAIL

First Name :	Dave
Last Name :	Farmer
Attachments :	DSEIS_3381_Farmer_Original.pdf (4 kb)

IBR Draft SEIS - RECORD #3381 DETAIL

Submission Date : 11/18/2024
First Name : Dave
Last Name : Farmer
Business/Organization/Agency :

Submission Input :

First Name:
Dave

Last Name:
Farmer

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
Additional comments from me.
Please delete light rail because it is just too expensive to build, maintain , operate. We need & deserve more through lanes. At least one more in each direction.
Tolls are unfair. The bridge is essential to whole state, so everyone should help pay. Use an efficient in place tax. People without kids ir grand kids pay a lot for public schools. The bridge and freeways are the same thing.

Thanks, I have written earlier.

JCA comment #: 922

IBR Draft SEIS - RECORD #3382 DETAIL

First Name :	Linda
Last Name :	goodman
Attachments :	DSEIS_3382_Goodman_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #3382 DETAIL

Submission Date : 11/19/2024
First Name : Linda
Last Name : goodman
Business/Organization/Agency :

Submission Input :

I was shocked to hear that the new interstate bridge would still be only three lanes each way. How will that relieve the congestion? I am opposed to keeping the bridge the same size and putting a rail system in that costs so much money. You should be planning for more lanes even if they are not used right away.

The cost is outrageous as is the potential cost of tolling.

Please reconsider the small size of the bridge and the added costs that will make tolling too expensive for many commuters.

Thank you,

Linda Goodman

Sent from my iPad

IBR Draft SEIS - RECORD #3383 DETAIL

First Name :	Haziel
Last Name :	Garcia
Attachments :	DSEIS_3383_Garcia_Original.pdf (4 kb)

IBR Draft SEIS - RECORD #3383 DETAIL

Submission Date : 11/18/2024
First Name : Haziel
Last Name : Garcia
Business/Organization/Agency :

Submission Input :

First Name:
Haziel

Last Name:
Garcia

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Induced Demand

Comment:
I am concerned that the current replacement plans for the I-5 bridge do not adequately prioritize sustainable and multimodal transportation options. The proposed designs lack dedicated pathways for bike users and fail to emphasize robust public transit infrastructure.

To effectively alleviate congestion, the new bridge must provide viable alternatives to driving. This means incorporating safe and accessible pathways for cyclists, as well as dedicated infrastructure for public transit, such as bus or light rail systems. Without these, the project misses a critical opportunity to reduce car dependency and support long-term mobility solutions.

Additionally, the project appears to be based on outdated data projecting significantly higher car usage than is currently anticipated. This has led to an oversized design that does not reflect present or future transportation trends. Oversized infrastructure may provide short-term congestion relief but, due to the phenomenon of induced demand, will likely worsen traffic in the long term. Such projects also burden local governments with excessive maintenance costs far into the future.

I urge the project team to appropriately scale the bridge replacement to current traffic projections and prioritize alternative transit solutions. A right-sized bridge that supports biking and public transportation is essential for reducing congestion sustainably, fostering equitable access, and creating a resilient transportation network for the future.

JCA comment #: 921

IBR Draft SEIS - RECORD #3384 DETAIL

First Name :	Kevin
Last Name :	Neely
Attachments :	DSEIS_3384_Neely_Original.pdf (4 kb)

IBR Draft SEIS - RECORD #3384 DETAIL

Submission Date : 11/18/2024
First Name : Kevin
Last Name : Neely
Business/Organization/Agency :

Submission Input :

First Name:
Kevin

Last Name:
Neely

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
It appears that much of the focus has been on long-haul trucking and auto excursions that are many hours in duration. However, I believe that if there is a focus on enabling rapid, easy transit between the Vancouver and Portland metropolitan areas for everything from pedestrian traffic to rail transit, this project will succeed in reducing overall congestion by incentivizing the local travel to utilize options other than automobiles.

Thus, the project should focus on placing transit lines adjacent to multi-use paths allows for easy and efficient transfers between biking, walking, and public transit. This can significantly enhance the user experience by minimizing the distance travelers must cover to switch modes of transportation.

JCA comment #: 920

IBR Draft SEIS - RECORD #3386 DETAIL

First Name :	Julie
Last Name :	Blackman CTC
Attachments :	DSEIS_3386_Blackman_Original.pdf (3 kb)

IBR Draft SEIS - RECORD #3386 DETAIL

Submission Date : 11/19/2024
First Name : Julie
Last Name : Blackman CTC
Business/Organization/Agency :

Submission Input :

I strongly oppose the Interstate Bridge Replacement plan as it currently stands.

The rapidly escalating costs are a serious concern, particularly in light of the minimal additional utility that will be gained by the expenditure. A projected increase of fifty percent in eleven months does not inspire confidence in either the planning or the ability of the region to pay for the eventual actual cost.

That this enormous expenditure would not add additional lanes/functionality to a primary, north/south piece of the national transportation system is mind-boggling.

Further, the proposal to back fill missing funding by tolling the public endlessly and without caps is irresponsible and entirely misreads the willingness of the residents of (and travelers through) the region to shell out for a project which, while probably improving seismic safety, otherwise does nothing whatsoever to improve the utility of the bridge.

Tolling itself is quite controversial and deserves a deeply serious and open-minded discussion in which the concerns and yes, objections, of the public are given true consideration. This has not occurred and, based on past experiences with government public comment programs, is not likely to occur.

Finally, the results of the recent national elections make it highly unlikely that either Oregon or Washington can count on funding at the level that the Biden administration has discussed. Oregon should take off the kid-in-the-candy-store, rose-colored glasses and face reality regarding this project, its design, and it's funding.

Sincerely,

Julie Blackman [redacted]

IBR Draft SEIS - RECORD #3387 DETAIL

First Name :	Je
Last Name :	Amaechi
Attachments :	DSEIS_3387_Amaechi_Original.pdf (5 kb)

IBR Draft SEIS - RECORD #3387 DETAIL

Submission Date : 11/18/2024
First Name : Je
Last Name : Amaechi
Business/Organization/Agency :

Submission Input :

First Name:
Je

Last Name:
Amaechi

Business or Organization:
Just Crossing Alliance, Unite Oregon

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Land Use and Economy

Comment:
The IBR project must prioritize equity and justice in its implementation:

1. Tolling Equity Program:
   - Implement low-income toll discounts from day one of pre-completion tolling
   - Ensure program is accessible and well-publicized
   - Create clear qualification criteria and simple application process
   - Monitor and adjust program based on community feedback
2. Impact Mitigation:
   - Historically marginalized communities bear disproportionate impacts
   - Address noise pollution through design and mitigation measures
   - Ensure toll structure doesn't create additional burdens
   - Implement targeted solutions for affected neighborhoods

The project scope requires careful reconsideration:

1. Second Auxiliary Lane:
   - DSEIS lacks adequate justification for this addition
   - Increased lanes may induce additional demand
   - Cost-benefit analysis appears incomplete
   - Alternative solutions should be explored
2. Project Focus:
   - Prioritize essential bridge replacement
   - Enhance transit and active transportation infrastructure
   - Limit unnecessary freeway expansion
   - Focus on cost-effective, sustainable solutions

Each of these aspects deserves careful consideration to ensure the IBR project serves all community members effectively while promoting sustainable transportation options for future generations.

JCA comment #: 919

IBR Draft SEIS - RECORD #3388 DETAIL

First Name :	Je
Last Name :	Amaechi
Attachments :	DSEIS_3388_Amaechi_Original.pdf (5 kb)

IBR Draft SEIS - RECORD #3388 DETAIL

Submission Date : 11/18/2024
First Name : Je
Last Name : Amaechi
Business/Organization/Agency :

Submission Input :

First Name:
Je

Last Name:
Amaechi

Business or Organization:
Just Crossing Alliance, Unite Oregon

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
I am submitting this comment regarding the IBR project's transportation components. The current design

requires significant improvements to ensure safety, accessibility, and seamless integration with transit:

1. Side-by-side Integration: The multi-use path and transit facilities must be located on the same side of the bridge. This would:
   - Enable seamless transfers between modes
   - Allow shared use of transit elevators
   - Enhance safety through increased visibility and activity
   - Provide emergency egress options
   - Support true multi-modal transportation goals
2. Vancouver Connectivity: The current design's "Vancouver dip" creates unacceptable barriers:
   - The half-mile spiral ramp adds significant out-of-direction travel
   - Forcing users to descend to the waterfront only to climb back up is inefficient and ableist
   - The path should remain elevated and extend to Evergreen Boulevard
   - This would eliminate unnecessary elevation changes and improve accessibility
3. Portland Connections: The project must enhance connectivity to existing networks:
   - Add direct connections to the Vancouver/Williams corridor
   - Improve integration with the Kenton/Denver Avenue link
   - Ensure seamless transitions to existing bicycle and pedestrian infrastructure
4. Safety and Comfort: Position transit lanes as buffers between the multi-use path and vehicle lanes to:
   - Reduce exposure to traffic noise
   - Minimize debris from vehicles
   - Create a more comfortable user experience
   - Enhance overall safety for active transportation users

The IBR project must prioritize forward-thinking transit design that accommodates future growth and changing transportation needs:

5. Future Capacity Requirements:
   - All stations should be designed to accommodate four-car trains
   - This aligns with planned downtown transit tunnel upgrades
   - Prevents costly retrofits in the future
   - Ensures seamless system integration
6. Long-term Transit Planning:
   - Design should accommodate future high-capacity transit systems
   - Consider potential for multi-lane Bus Rapid Transit (BRT)
   - Plan for possible heavy rail integration
   - Look beyond the 2045 EIS horizon to ensure infrastructure adaptability
7. Traffic Modeling Concerns:
   - Current models must accurately account for induced demand
   - Realistic projections are essential for proper transit system sizing
   - Better modeling will ensure appropriate capacity planning
   - Transit infrastructure must be sized for actual future needs

JCA comment #: 918

IBR Draft SEIS - RECORD #3389 DETAIL

First Name :	Dana
Last Name :	Henderson
Attachments :	DSEIS_3389_Henderson_Original.pdf (5 kb)

IBR Draft SEIS - RECORD #3389 DETAIL

Submission Date : 11/18/2024
First Name : Dana
Last Name : Henderson
Business/Organization/Agency :

Submission Input :

First Name:
Dana

Last Name:
Henderson

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Induced Demand

Comment:
I believe the Interstate Bridge should be future proofed against the inevitable congestion and environmental impact that will come from adding highway lanes, by creating expandable infrastructure for public transit and multi-use Bike/LEV pathways, rather than prioritizing inefficient private car transit. Rail stations should be built with the expectation of future expansion to higher capacity four-car trains and heavy rail. Any plan with projections on the presumed use of the finished project that does not take into account the effects of induced

demand is simply misleading the public.

Portland needs to reaffirm a commitment to thoughtfully implemented public works and a design ethos that prioritizes humans rather than vehicles. Induced demand from highway expansion will not only mean congestion in the project area, but will inevitably flood more vehicles into adjoining areas that already suffer from insufficient capacity and dangerous speeding. The city needs to prioritize the average person being able to easily reduce the number of trips they take by car in a year rather than fueling an inexhaustible demand for vehicle space by continually prioritizing the mode of transportation least equipped to solve any of the city's broader transit needs.

JCA comment #: 917

IBR Draft SEIS - RECORD #3390 DETAIL

First Name :	Kevin
Last Name :	Neely
Attachments :	DSEIS_3390_Neely_Original.pdf (4 kb)

IBR Draft SEIS - RECORD #3390 DETAIL

Submission Date : 11/18/2024
First Name : Kevin
Last Name : Neely
Business/Organization/Agency :

Submission Input :

First Name:
Kevin

Last Name:
Neely

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Neighborhoods and Equity

Comment:
The project needs to consider connections to nearby neighborhood hubs, leveraging the public transportation already active, thus extending the utility of a comprehensive transit system:

- **Vancouver**: Extending the multi-use path to connect with the Evergreen area can eliminate the need for navigating challenging routes, such as a 100-foot high spiral. This extension can make the path more accessible and appealing to a wider range of users, encouraging more people to opt for cycling or walking.
- **Portland**: Improving connectivity by adding links to existing popular corridors, such as the Vancouver/Williams corridor, can enhance the utility of the multi-use path network. These connections can provide users with more direct routes and improve access to key destinations. Additionally, incorporating the

planned Kenton/Denver Ave. link can further integrate the path into the city’s broader transportation network.

JCA comment #: 916

IBR Draft SEIS - RECORD #3391 DETAIL

First Name :	Cory
Last Name :	Pinckard
Attachments :	DSEIS-3391_Pinckard_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #3391 DETAIL

Submission Date : 11/18/2024
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 #: 915

IBR Draft SEIS - RECORD #3393 DETAIL

First Name :	Tabor
Last Name :	Kelly
Attachments :	DSEIS-Kelly_3393_20241118_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #3393 DETAIL

Submission Date : 11/18/2024
First Name : Tabor
Last Name : Kelly
Business/Organization/Agency :

Submission Input :

First Name:
Tabor

Last Name:
Kelly

Email:
taborkelly@gmail.com

City:
Vancouver

US States:
WA

Zip:
98661

Topic Area:
Induced Demand

Comment:
I would like to see higher tolls during times of peak use. Specifically, I would like to have real time pricing that keeps going up whenever there is too much traffic. Ideally, with no cap on maximum tolls.

JCA comment #: 914

IBR Draft SEIS - RECORD #3394 DETAIL

First Name :	NA
Last Name :	NA
Attachments :	127397_DSEISShumway_3394_20241118_Original_Redacted.pdf (4 kb)

IBR Draft SEIS - RECORD #3394 DETAIL

Submission Date : 11/19/2024
First Name : NA
Last Name : NA
Business/Organization/Agency :

Submission Input :

Shumway 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 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. We submit the following comments.

Our 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 Neighborhood 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.

We urge 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.

We are concerned that a design is not yet available for the Fourth Plain Boulevard, 29th Street, 33rd Street, and 39th Streets overpasses adjacent to the neighborhood. The Shumway Neighborhood will have input on the overpass design when available.

We 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.

We urge 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.

We oppose tolling until the project is complete. We 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.

k/r,
Shumway Neighborhood Association
*E: [redacted]

IBR Draft SEIS - RECORD #3395 DETAIL

First Name :	Chelsea
Last Name :	Stewart-Fusek
Attachments :	DSEIS-3395_StewartFusek_Original.pdf (3 kb)

IBR Draft SEIS - RECORD #3395 DETAIL

Submission Date : 11/18/2024
First Name : Chelsea
Last Name : Stewart-Fusek
Business/Organization/Agency :

Submission Input :

First Name:
Chelsea

Last Name:
Stewart-Fusek

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
Based on the information in the DEIS, there is no clear need for a second auxiliary lane. Please consider eliminating this lane to save resources and reduce the already significant environmental effects of the project.

JCA comment #: 913

IBR Draft SEIS - RECORD #3396 DETAIL

First Name :	James
Last Name :	Ofsink
Attachments :	DSEISOfsink_3396_20241118_Original.pdf (4 kb)

IBR Draft SEIS - RECORD #3396 DETAIL

Submission Date : 11/18/2024
First Name : James
Last Name : Ofsink
Business/Organization/Agency :

Submission Input :

First Name:
James

Last Name:
Ofsink

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
As someone who drives, bikes, and takes transit across the Columbia River, I think it's important that the new crossing better handle connections between active transportation and public/mass transportation. This is a huge investment of public resources and must align with our long term climate and mobility goals and not just short term congestion. Active transportation like walking, biking, scooters, etc. need to have easy and efficient connections with public/mass transit to make the system function as a whole and to provide options for people who can't or opt not to drive. From what I can tell the current plan would add a considerable distance and elevation gain to my bike ride across the bridge. My guess is that this will act as a deterrent to people who would otherwise be interested in walking, biking, or using other active means to cross the river. We should be incentivizing these modes or travel, instead of deterring them! Thank you for your consideration in developing a

crossing that matches our region's values and is a good use of public funds given the numerous challenges we face.

JCA comment #: 912

IBR Draft SEIS - RECORD #3397 DETAIL

First Name :	Tabor
Last Name :	Kelly
Attachments :	DSEISKelly_3397_20241118_Original.pdf (39 kb)

IBR Draft SEIS - RECORD #3397 DETAIL

Submission Date : 11/18/2024
First Name : Tabor
Last Name : Kelly
Business/Organization/Agency :

Submission Input :

First Name:
Tabor

Last Name:
Kelly

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Land Use and Economy

Comment:
I would very much appreciate it if you could minimize the amount of land that you take for this freeway widening plan. Along these lines I would prefer no auxiliary lanes.

JCA comment #: 911

IBR Draft SEIS - RECORD #3398 DETAIL

First Name :	Nancy
Last Name :	Forrest
Attachments :	DSEISForrest_3398_20241118_Original.pdf (5 kb) Bridges.png (1 mb)

IBR Draft SEIS - RECORD #3398 DETAIL

Submission Date : 11/18/2024
First Name : Nancy
Last Name : Forrest
Business/Organization/Agency :

Submission Input :

First Name:
Nancy

Last Name:
Forrest

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
The currently proposed Beam style bridge is hideous!!! Why would anyone want such an ugly, outdated looking monstrosity in the midst of such a beautiful landscape? In this day and age there are many preferable options and engineering feats possible that both Portland and Vancouver and the Columbia River deserve. You have got to do better than this unacceptable eyesore! American Infrastructure should look to designs worldwide that offer beauty and creativity, affordability and reliability. We are very behind the rest of the planet and need to

catch up when it comes to world class design and engineering of bridges.
Cable-Stayed Bridges–
Fast construction time compared to other bridge types. More rigid than suspension bridges. Cost-effective. Can be aesthetically pleasing.
Multiple design options: (e.g., side-spar, cantilever-spar, multiple-span, cradle-system designs).
Suspension Bridges –
The best bridge type for creating the longest spans with minimum piers. Regarded by many as aesthetically pleasing – creating a landmark for the community. The waterway can be left open while the bridge is under construction – (almost all of the work takes place on the top of the bridge).
Flexibility – design allows for deck sections to be replaced. Can be built with a high deck, allowing plenty of clearance for passing ships.
The rest of the world has been building highly functional and esthetically pleasing bridges for decades while the US has allowed it's infrastructure to crumble. We deserve a stunningly beautiful and superbly designed and engineered bridge crossing at the magnificent Columbia River that drivers will be willing to pay crossing fees for and be proud of for many years to come. I strongly suggest contacting European and Asian bridge design companies for help as they are decades ahead of American design in this field.

Attachment (maximum one):
Bridges.png

JCA comment #: 910

IBR Draft SEIS - RECORD #3399 DETAIL

First Name :	Shelly L.
Last Name :	Galbreth
Attachments :	DSEIS_3399_JBMISchwabe_Original.pdf (328 kb) image001.png (456 bytes) image002.png (5 kb) JBMI Objection to IBR Draft SEIS.pdf (328 kb)

Schwabe

November 18, 2024

Maren L. Calvert
Admitted in Washington, Oregon, California and Hawaii
D: 360-597-0804
mcalvert@schwabe.com

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 Jantzen Beach Moorage Inc.

Dear Interstate Bridge Replacement Team:

This office represents Jantzen Beach Moorage Inc. ("JBMI") regarding real property it owns and/or leases in Portland, Oregon at 1525-2055 N. Jantzen Avenue and due south of it in the Oregon Slough that appear to be impacted by the Interstate Bridge Replacement project (hereinafter, "IBR"). This letter constitutes JBMI's comments on the Draft Supplemental Environmental Impact Statement ("Draft SEIS").

JBMI Property: JBMI owns 1525-2055 N. Jantzen Avenue which is a 5.3 acre strip of land between North Jantzen Avenue and the water, on Hayden Island (the "JBMI Land"). JBMI's Land is identified for partial acquisition, as illustrated in the excerpt from the Draft SEIS, Land Use Technical Report, Figure 4-3 below.



In addition, JBMI owns the slips, fingers, piers, rows, and other infrastructure (collectively, the "Infrastructure") in the water south of JBMI Land, including but not limited to Rows A-Q. As illustrated in the image above, some of that Infrastructure has been identified for partial acquisition

and temporary construction easements. The center section is inaccurately identified as not being impacted, but as explained below, the IBR's proposed uses of the JBMI property generally will impact this center section of the Infrastructure, as well.

The IBR identified the entire JBMI site as being eligible for listing in the National Register of Historic Places. The IBR also concluded that the effect on JBMI from the project would be adverse. Nevertheless, as explained below, the Draft SEIS fails to adequately consider, avoid, mitigate or resolve the land use, neighborhood, noise, navigation, visual, transportation, habitat and wetland impacts of the IBR project on the historic JBMI. Because section 106 requires resolution of adverse effects, as described in 36 CFR Part 800.6, the Draft SEIS does not meet the requirements of NEPA or Section 106 of the NHPA.

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Added to that, unlike land-based living, water-based living brings residential structures within feet (or inches) of construction vehicles. For example, construction and environmental testing vessels have already navigated immediately next to floating homes, belching diesel exhaust fumes directly into the living rooms and dining areas of those homes. The Draft SEIS does not recognize or adequately analyze the disruption and health risks this behavior will cause.

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The Draft SEIS also fails to recognize the navigational or water-based impacts on the JBMI floating home community. As discussed above, wave action can cause significant damage to floating homes. Inserting new bridge footings into the river will change the speed, direction, turbulence, and current of the river, potentially causing refractory wave action and/or eddies, both of which will increase erosion of the embankment. The Navigation Report completely ignores this fact, admitting that the IBR did not even find (and thus the Draft SEIS does not analyze) water current or wave data for the Oregon Slough. *See* Sections 2.14 and 2.15.1.

The Draft SEIS fails to acknowledge that removing 13 floating homes and their associated infrastructure (i.e. Rows A, B, and the East side of Row C), will also affect the currents and wave action experienced in the community. Thus, Row C and the remaining rows of JBMI, which are down river, will likely need to have their infrastructure hardened and reinforced to withstand the increased currents and hydraulic pressure they will have to endure if Row A is removed.

Erosion from these current changes will eat away at JBMI's Land and/or cause structural concerns for JBMI's Infrastructure, requiring additional reinforcements and likely ongoing maintenance. Erosion may also deposit silt under or in between floating homes, causing them to bottom out or making boating access to and from a floating home impossible. Deposited silt will require ongoing dredge maintenance, significantly increasing maintenance costs for JBMI.

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JBMI appreciates the pedestrian and bike path proposals, and the auxiliary access proposals to Hayden Island. These features will hopefully improve transportation to and from the JBMI community. JBMI is concerned, however, about the installation of interchange ramp terminals on Jantzen Avenue, so close to their homes. The Transportation Technical Report does not analyze the impact of this improvement on the JBMI residential community, at all.

Moreover, the Transportation Technical Report inappropriately defers the analyses of whether any mitigation might be required and what that mitigation might be until after the public comment period closes.[4] This deprives the public of an opportunity to participate and does not meet the requirements of NEPA.

Habitat and Wildlife Impacts

The Wetlands and Other Waters Technical Report discusses the benthic habitat, or river bottom, quite a bit, but does not contain an adequate analysis of the impacts to it or to the in-water, above-water, or on-land habitats and species. The only proposed mitigation is to "[r]estore temporarily disturbed wetland and wetland buffer habitats consistent with applicable regulatory requirements." Section 6.3.2. The following section discusses the federal, state, and local permitting requirements but does not explain (a) what habitats or species will be impacted; (b) how those impacts are going to be avoided, or (c) how unavoidable impacts will be mitigated. This Report, therefore, misses the whole point of conducting an environmental analysis. Noise, vibrations, water pollution, noxious fumes, traffic, and construction will all impact the ducks, geese, hummingbirds, hawks, beavers, otters, sturgeon and salmon and other animals that inhabit the land and waters of JBMI. The Draft SEIS fails to adequately consider or attempt to avoid and mitigate those impacts.

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. The Draft SEIS does not identify unavoidable adverse environmental impacts or the secondary (indirect) and cumulative effects of implementing the IBR project with respect to my client's property. This

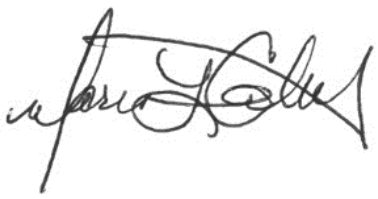
[4] See section 7.1.6 ("Mitigation could be required for study intersections that meet agency performance standards under the No-Build Alternative but operate below agency performance standards under the Modified LPA or options. Mitigation could also be required for the Modified LPA or options if the 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.")

letter identifies significant information relevant to environmental concerns that bear on the IBR project, justifying and requiring further work on the Draft SEIS.

JBMI 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 to the JBMI floating home community. 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

Schwabe

November 18, 2024

Maren L. Calvert
Admitted in Washington, Oregon, California and Hawaii
D: 360-597-0804
mcalvert@schwabe.com

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

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Transportation Impacts

JBMI appreciates the pedestrian and bike path proposals, and the auxiliary access proposals to Hayden Island. These features will hopefully improve transportation to and from the JBMI community. JBMI is concerned, however, about the installation of interchange ramp terminals on Jantzen Avenue, so close to their homes. The Transportation Technical Report does not analyze the impact of this improvement on the JBMI residential community, at all.

Moreover, the Transportation Technical Report inappropriately defers the analyses of whether any mitigation might be required and what that mitigation might be until after the public comment period closes.[4] This deprives the public of an opportunity to participate and does not meet the requirements of NEPA.

Habitat and Wildlife Impacts

The Wetlands and Other Waters Technical Report discusses the benthic habitat, or river bottom, quite a bit, but does not contain an adequate analysis of the impacts to it or to the in-water, above-water, or on-land habitats and species. The only proposed mitigation is to "[r]estore temporarily disturbed wetland and wetland buffer habitats consistent with applicable regulatory requirements." Section 6.3.2. The following section discusses the federal, state, and local permitting requirements but does not explain (a) what habitats or species will be impacted; (b) how those impacts are going to be avoided, or (c) how unavoidable impacts will be mitigated. This Report, therefore, misses the whole point of conducting an environmental analysis. Noise, vibrations, water pollution, noxious fumes, traffic, and construction will all impact the ducks, geese, hummingbirds, hawks, beavers, otters, sturgeon and salmon and other animals that inhabit the land and waters of JBMI. The Draft SEIS fails to adequately consider or attempt to avoid and mitigate those impacts.

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. The Draft SEIS does not identify unavoidable adverse environmental impacts or the secondary (indirect) and cumulative effects of implementing the IBR project with respect to my client's property. This

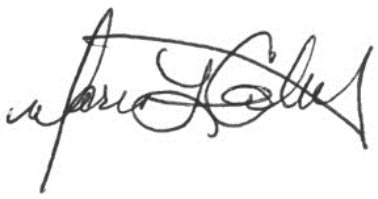
[4] See section 7.1.6 ("Mitigation could be required for study intersections that meet agency performance standards under the No-Build Alternative but operate below agency performance standards under the Modified LPA or options. Mitigation could also be required for the Modified LPA or options if the 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.")

letter identifies significant information relevant to environmental concerns that bear on the IBR project, justifying and requiring further work on the Draft SEIS.

JBMI 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 to the JBMI floating home community. 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

IBR Draft SEIS - RECORD #3400 DETAIL

First Name :	Chelsea
Last Name :	Stewart-Fusek
Attachments :	DSEISStewartFusek_3400_20241118_Original.pdf (4 kb)

IBR Draft SEIS - RECORD #3400 DETAIL

Submission Date : 11/18/2024
First Name : Chelsea
Last Name : Stewart-Fusek
Business/Organization/Agency :

Submission Input :

First Name:
Chelsea

Last Name:
Stewart-Fusek

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Wetlands

Comment:
Wetlands and floodplains are essential to maintaining water quality, flood resilience, absorption of excessive heat, and wildlife. The Willamette Valley has already lost nearly 60% of its wetlands, and this has vastly increased the metro area's vulnerability to flood events. Accordingly, it is highly concerning that this project will result in the permanent filling of over a half-acre of wetlands, and over 7 acres of wetland buffers (with at least 2.56 acres experiencing temporary effects). It is notable, too, that the Vanport wetland will lose 3.5 acres of its wetland buffer--this is an existing wetland mitigation site and is very important to wildlife. The full impacts of these lost acres should be analyzed and mitigation ratios and practices consistent with the National Marine Fisheries Service's 2016 Biological Opinion should be implemented, even where these mitigation requirements exceed the City of Portland's.

JCA comment #: 909

IBR Draft SEIS - RECORD #3401 DETAIL

First Name :	Tabor
Last Name :	Kelly
Attachments :	DSEISKelly_3401_20241118_Original.pdf (3 kb)

IBR Draft SEIS - RECORD #3401 DETAIL

Submission Date : 11/18/2024
First Name : Tabor
Last Name : Kelly
Business/Organization/Agency :

Submission Input :

First Name:
Tabor

Last Name:
Kelly

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
With the rise of e-bikes a 25' shared-use path is insufficient. At the very minimum you should provide three 6' lanes in each direction. This will allow pedestrians, slow cyclists, and fast cyclist to be separated from each other. Obviously, 3x6x2 = 36'

JCA comment #: 908

IBR Draft SEIS - RECORD #3402 DETAIL

First Name :	Sarah
Last Name :	Cline
Attachments :	DSEISCline_3402_20241118_Original.pdf (5 kb)

IBR Draft SEIS - RECORD #3402 DETAIL

Submission Date : 11/18/2024
First Name : Sarah
Last Name : Cline
Business/Organization/Agency :

Submission Input :

First Name:
Sarah

Last Name:
Cline

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
Hi,
Thank you for accepting comments on the Interstate Crossing. I live in NE Portland close to the I-5. I fully support tolls but I am worried about how they will impact the most vulnerable members of our community. We MUST implement a low-income toll discount program from day one -- working families cannot wait for this. You must talk with these communities to figure out how to meet their needs otherwise the plan won't be successful.

I also want to emphasize how important easily accessible public transport and bike transportation is to me. In order for families and older people to feel comfortable using bike lanes, they MUST have physical barriers from traffic. Also, it needs to connect to popular bike corridors like Williams / Vancouver without any dangerous segments.

Finally, climate change is here and only going to get stronger. We must future proof this bridge to accommodate more and better multimodal transportations as we (hopefully!) move away from car-centric transportation.

thank you,
Sarah

JCA comment #: 907

IBR Draft SEIS - RECORD #3403 DETAIL

First Name :	Alyssa
Last Name :	McGhghy
Attachments :	DSEIS-3403_McGhghy_Original.pdf (9 kb)

IBR Draft SEIS - RECORD #3403 DETAIL

Submission Date : 11/18/2024
First Name : Alyssa
Last Name : McGhghy
Business/Organization/Agency :

Submission Input :

First Name:
Alyssa

Last Name:
McGhghy

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
I have reviewed the lengthy Interstate Bridge Draft Environmental Statement and accompanying supplemental materials. After studying the documents, I have several concerns regarding the project's impact on pedestrians, bicyclists, local businesses, and the environment.

First, the design of the bridge and associated roadway expansion prioritizes motor vehicle traffic at the expense

of accessible and convenient options for pedestrians and cyclists. While the project significantly increases capacity for cars—adding four additional motor vehicle lanes (expanding from 10 to 14 lanes) under Evergreen Blvd. in Vancouver—there is little consideration for enhancing active transportation infrastructure. This expansion of concrete will displace green spaces, destroy local businesses, and disrupt the character of the downtown Vancouver area, including the historic Fort Vancouver region.

The addition of four motor vehicle lanes represents a 28% increase in the highway's width, which will not only consume more land and vegetation, but will also contribute to higher levels of air pollution, tire byproducts, and noise, all of which will negatively affect the core of Vancouver.

I am also concerned about the design of the bicycle and pedestrian pathways, which are both cumbersome and impractical. On the Vancouver side, the access ramps for these pathways are awkwardly designed, forcing active transportation users to navigate convoluted routes to reach the bridge's elevated pathway, which is 100 feet (10 stories) above the ground. This will create a tall and exposed crossing with significant wind, noise, and temperature challenges—likely deterring people from choosing walking or biking as viable options. The lack of shading and greenery along these pathways will exacerbate the impact of the elements, making the crossing uncomfortable, especially in summer months.

Additionally, the wider motor vehicle lanes on Hayden Island will displace thriving local businesses, increase air and noise pollution, and elevate the cost of maintenance. This expansion will also worsen congestion throughout the I-5 corridor in Vancouver and Portland, ultimately creating a more polluted and less efficient transportation environment for everyone.

Another issue is the bicycle and pedestrian access to North Portland. The route provided for non-motorized traffic is circuitous and indirect, making it significantly harder to navigate compared to the direct path offered to motor vehicles. This undermines the goal of providing efficient, equitable access for all modes of transportation.

As someone who works in active transportation within city government, I've seen firsthand the many benefits that walking, biking, and rolling can bring to a community. These modes of transport help improve public health, reduce congestion, lower carbon emissions, and provide more equitable access to essential services. I have witnessed how communities thrive when people have safe, convenient, and accessible routes for walking and biking. Investing in active transportation infrastructure is a crucial step toward creating healthier, more sustainable, and livable cities, and it's disheartening to see these needs sidelined in favor of more car-centric solutions.

Furthermore, it's important to note that expanding highways and adding more lanes rarely leads to reduced congestion in the long run. History has shown that instead of easing traffic flows, wider roads simply encourage more people to drive, until the expanded capacity fills up again, leading to gridlock just as bad—if not worse—than before. The addition of more lanes only serves to attract more cars, ultimately clogging up the roadway and failing to solve the core problem of traffic congestion.

In conclusion, the current design of the Interstate Bridge project negatively impacts human health, local development, and environmental sustainability. It expands motor vehicle use, increases pollution, and undermines climate goals, while offering minimal improvements for active transportation. The project should be

reconsidered and scaled back to provide safer, more efficient options for pedestrians, cyclists, and public transit users.

JCA comment #: 906

IBR Draft SEIS - RECORD #3404 DETAIL

First Name :	Mary
Last Name :	Scott
Attachments :	DSEIS-3404_Scott_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #3404 DETAIL

Submission Date : 11/18/2024
First Name : Mary
Last Name : Scott
Business/Organization/Agency :

Submission Input :

First Name:
Mary

Last Name:
Scott

Business or Organization:
Mary Scott, ND

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
I'm strongly in favor of more pedestrian, bicycle and mass transit options for the Interstate Bridge Replacement. As a native Oregonian, bike rider since age 6 and current bicyclist, walker and mass transit rider in Portland as often as realistically possible, this is of utmost importance. I'm also in favor of any plans that will lessen the burden on people of low incomes, people commuting to low pay jobs via the Interstate Bridge. For the sake of our precious environment, our lead resourced citizens, please make the right choice on valuing these aspects.

Thank you,
Mary Scott, ND

JCA comment #: 905

IBR Draft SEIS - RECORD #3405 DETAIL

First Name :	Alex
Last Name :	Grant
Attachments :	DSEIS-3405_Grant_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #3405 DETAIL

Submission Date : 11/19/2024
First Name : Alex
Last Name : Grant
Business/Organization/Agency :

Submission Input :

Hello,

I feel that the second auxiliary lane in the draft is unnecessary. It will increase the cost of the project to taxpayers while further inducing more demand for driving. I do not believe that this additional lane will have a positive effect on travel times for drivers, we've seen in the past that additional driving lanes do not reduce traffic in the long run.

I support the replacement of the bridge while keeping the existing number of lanes.

Thank You,

Alex Grant

IBR Draft SEIS - RECORD #3406 DETAIL

First Name :	Larry
Last Name :	Mortimer
Attachments :	DSEIS-3406_Mortimer_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #3406 DETAIL

Submission Date :	11/18/2024
First Name :	Larry
Last Name :	Mortimer
Business/Organization/Agency :	RestoreVeterans

Submission Input :

In regards to, Supplemental Environmental Impact Statement & Section 106 Effects to historic properties, why are we not on this list?
1940 Craftsman Home built for President Principle of Shumway High School.
Foundation cracked bad
Doors swing open or closed, house is Sinking
Windows cracked by vibration from Semi trucks and trailers
Noise from Jake Brakes and Loud Mufflers
Summertime Brake DUST is bad.
Ivy Growth is Never maintained

IBR Draft SEIS - RECORD #3407 DETAIL

First Name :	Rodney
Last Name :	Krause
Attachments :	DSEIS-3407_Krause_Original.pdf (2 kb)

IBR Draft SEIS - RECORD #3407 DETAIL

Submission Date : 11/18/2024
First Name : Rodney
Last Name : Krause
Business/Organization/Agency :

Submission Input :

Cultural Resources & Section 106

Section 106 and the National Environmental Policy Act (NEPA) requires federal agencies to consider the effects of their undertakings on historic properties. The Section 106 process seeks to accommodate historic preservation concerns with the needs of federal undertakings through consultation. The goal of consultation is to identify historic properties potentially affected by the undertaking, assess its effects and seek ways to avoid, minimize or mitigate any adverse effects on historic properties.

We believe our property at 3509 H Street should be studied as part of the Section 106 process. Our house was built in 1920 and is over 104 years old. According to Clark County Historical Museum, it was the first residence built on H Street between 33rd and 39th streets.

Our property sits approximately 150 feet from property that is identified for total acquisition. We currently hear and feel the vibrations from the traffic that travels on the SR-500 flyover and the 39th Street onramp. We can see these vehicles from our second and third stories in our home. With the addition of the new Fourth Plain braided exit, traffic will be routed 50 feet closer to our house. This will include heavy freight traffic that is using the Fourth Plain exit to travel to the Port of Vancouver.

We are concerned about the effects the construction and traffic could have on our home and the quality of our lives. Our home has little to no insulation and the windows are not up to current building standards (some are original to the house). This creates a serious threat to our ability to experience peace and tranquility in our historic home.

A study of our property to assess the effects the IBRP should be required. This must be accomplished to determine ways to avoid, minimize or mitigate these adverse effects on our historic property. We are legally entitled to have input on the design and aesthetics of the sound wall. We should also be involved in the mitigation plan for the current and future additional pollution that this project will create. This should include the height of the sound wall and its ability to shield our residence from the noise and vibrations and the number and types of trees and vegetation that will replace the existing landscaping that will be removed for this project.

IBR Draft SEIS - RECORD #3408 DETAIL

First Name :	Louise
Last Name :	Lopes
Attachments :	DSEIS-3408_Lopes_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #3408 DETAIL

Submission Date :	11/18/2024
First Name :	Louise
Last Name :	Lopes
Business/Organization/Agency :	

Submission Input :

While the bridge is needed due to increasing traffic volume, it is imperative that every possible precaution be taken to lessen the impact on ALL wildlife - in the water, the air and on the land. This includes also a lessening of impact to plant life, air quality and the environment.

IBR Draft SEIS - RECORD #3409 DETAIL

First Name :	Carol
Last Name :	Ross
Attachments :	DSEIS-3409_Ross_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #3409 DETAIL

Submission Date :	11/18/2024
First Name :	Carol
Last Name :	Ross
Business/Organization/Agency :	

Submission Input :

As a life-long resident of Vancouver, I believe it is very important to prioritize preservation of our local historic buildings. In particular, the IBR Project needs to reconsider its findings about Providence Academy. It is clearly located extremely close to the construction pathway, and will in all likelihood be negatively impacted. As required by law under section 106 protections, proper mitigation should be provided to protect this irreplaceable landmark. Thank you for your consideration.

IBR Draft SEIS - RECORD #3410 DETAIL

First Name :	W Dean
Last Name :	Irvin
Attachments :	DSEIS-3410_Irvin_Original.pdf (12 kb)

IBR Draft SEIS - RECORD #3410 DETAIL

Submission Date :	11/19/2024
First Name :	W Dean
Last Name :	Irvin
Business/Organization/Agency :	Property owner/manager

Submission Input :

Section 106 Determinations of Eligibility and Findings of Effect
November 17, 2024

The rejection of extending Portland, Oregon's light rail system into Vancouver, Washington, particularly the MAX Light Rail, stems from several factors rooted in political, economic, and cultural concerns. Here are some of the key reasons:

1. Tax Concerns: Many residents in Clark County were opposed to the potential increase in taxes that might be required to fund the light rail extension. They were concerned that the costs of maintaining and operating the light rail would outweigh its benefits.
2. Anti-Urbanization Sentiment: A portion of Clark County residents preferred to maintain the suburban and less urbanized character of the region. They feared that the light rail would lead to more dense development and increase Portland's influence in their area.
3. Crime and Social Issues: Some opponents expressed concerns that extending the light rail would make it easier for crime to spread from Portland into Vancouver. This perception, while often debated, played a significant role in public discourse.
4. Transportation Preferences: Many in Clark County prefer investments in road infrastructure over mass transit. They argued that light rail would not sufficiently address congestion issues on the I-5 corridor, particularly at the Columbia River crossing.
5. Distrust of Portland's Influence: The cultural and political differences between Vancouver and Portland also played a role. Some residents felt that bringing in Portland's light rail system would give Portland undue influence over Clark County's development and policies.
6. Failed Columbia River Crossing (CRC) Project: The proposed light rail was tied to the Columbia River Crossing, a project to replace the I-5 bridge. Opposition to the CRC project's cost, tolling plans, and inclusion of light rail ultimately contributed to its cancellation in 2013.
What are the solutions for 1 through 6 above?
The environmental impact of extending Portland Oregon's light rail system into Vancouver, Washington involves drawbacks. Here are a few of the impacts:

Environmental Drawbacks:
1. Construction Impacts:
Building the infrastructure for light rail involves significant environmental disruption, including the use of energy-intensive materials (like steel and concrete), habitat destruction, and potential water pollution from runoff during construction.
2. Energy Demand:
While electric-powered, light rail increases regional electricity demand. If the grid relies on fossil fuels, the environmental benefits may be offset to some extent.
3.Loss of Open Spaces:

New light rail lines and stations may encroach on undeveloped land or areas with ecological value, disrupting ecosystems and wildlife corridors.

4. Encouragement of Urban Expansion:

Improved connectivity between Portland and Vancouver could increase development in areas not currently urbanized, potentially leading to more environmental strain in the long term.

Residents of Vancouver and Clark County, Washington have had opportunities to vote on issues related to bringing Portland, Oregon's light rail into the region, often tied to broader transportation projects like the Columbia River Crossing (CRC). These votes and public debates illustrate that the majority of Clark County residents have historically opposed extending Portland's light rail system into Vancouver, primarily due to financial, political, and cultural concerns. Here are key moments:

1. 1995 Vote:

Clark County residents voted on a proposed sales tax increase to help fund light rail as part of a bi-state transportation plan. The measure was decisively rejected, reflecting strong opposition to light rail at the time.

2. 2012 Vote on C-Tran Tax Increase:

In 2012, voters in parts of Clark County considered a 0.1% sales tax increase to fund the operation of a proposed light rail extension from Portland to Vancouver as part of the CRC project. This measure also failed, with around 56% of voters rejecting it. The rejection was seen as a significant blow to the light rail proposal and the larger CRC project.

3. Public Input on the Columbia River Crossing:

though not a direct vote, public opposition to the inclusion of light rail in the CRC project played a major role in the project's eventual collapse in 2013. Critics often cited concerns about costs, tolling, and the overall necessity of light rail for the region.

These votes and public debates illustrate that the majority of Clark County residents have historically opposed extending Portland's light rail system into Vancouver, primarily due to financial, political, and cultural concerns.

Why would the above issues be different today?

Will Vancouver Residents Get to Vote Again?

If YES: Please Explain

If NO: Please Explain

The loss of historic properties due to the Interstate Bridge Replacement (IBR) project has significant cultural, social, and community impacts. These effects go beyond physical structures, as historic buildings represent a connection to the past and contribute to the character and identity of a community. Here's a breakdown of some of the potential effects:

1. Loss of Cultural Heritage and Community Identity

• Historical Significance:

Buildings on the historic register often reflect unique architectural styles, craftsmanship, and the stories of the people who built and used them. Their demolition erases tangible links to Vancouver's past, weakening the community's sense of continuity and identity.

• Loss of Shared History:
When historic buildings are removed, the stories they represent may fade from collective memory, making it harder for future generations to connect with the area's cultural roots.
2. Social and Emotional Impact on Residents
• Displacement:
Residents and businesses in affected properties may face displacement, disrupting their lives and potentially leading to a loss of community cohesion. For renters and small business owners, relocation can mean financial hardship and a loss of loyal customer bases or neighborhood ties.
• Emotional Impact:
The destruction of familiar landmarks can cause sadness or resentment among residents, especially those with personal or familial ties to these properties.
3. Economic Implications
• Tourism Loss:
Historic buildings often attract tourism, bringing economic benefits to the community. Losing these properties could reduce opportunities for heritage tourism.
• Missed Revitalization Potential:
Historic buildings can often be repurposed in ways that enhance economic development while preserving their character. Demolition forecloses these possibilities, replacing irreplaceable architecture with potentially generic modern structures.
4. Environmental Impact of Demolition
• Embodied Carbon Loss:
Historic buildings represent significant investments in materials and energy from their original construction. Demolishing them and building new structures generates waste and increases the carbon footprint, counteracting sustainability goals.

The challenge for the IBR project lies in balancing modern transportation needs with the preservation of the community's cultural and historical fabric. Including community voices in decision-making, prioritizing mitigation efforts, and seeking creative design solutions can help minimize the negative impact on Vancouver's history and identity.
The financial impacts on businesses and residents in the Vancouver, Washington and Portland, Oregon area during the proposed 10-year construction of the Interstate Bridge Replacement (IBR) project include significant disruptions and economic losses:
1. Business Disruption: The IBR project spans five miles and involves major interchange reconstructions and the addition of a new bridge. Businesses along this corridor, particularly small local establishments, will face reduced customer access, traffic delays, and temporary closures during construction, leading to lost revenue.
2. Tourism Impact: Construction-related congestion and aesthetic disruptions might deter tourists from visiting downtown Vancouver and nearby attractions. Traffic delays may also impact cross-border travel between Washington and Oregon, affecting events and local tourism economies.
3. Residential and Cultural Displacement: Over 160 properties, including some with historic significance, are expected to be affected, potentially displacing long-standing businesses and residents. This could alter the character of certain neighborhoods and reduce the appeal of the area for visitors.
4. Compensation and Mitigation: How will businesses and residents be compensated for loss of business and disruption during IBR construction?



IBR Draft SEIS - RECORD #3411 DETAIL

First Name :	N/A
Last Name :	N/A
Attachments :	DSEIS-3411_NA_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #3411 DETAIL

Submission Date :	11/18/2024
First Name :	N/A
Last Name :	N/A
Business/Organization/Agency :	

Submission Input :

I’ve been following this for close to twenty years. I want to make sure that the environment and transit are prioritized. I believe there should be a toll to help pay for it and that Oregon and Washington should fairly split the cost.

IBR Draft SEIS - RECORD #3412 DETAIL

First Name :	N/A
Last Name :	N/A
Attachments :	DSEIS-3412_NA_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #3412 DETAIL

Submission Date : 11/18/2024

First Name : N/A

Last Name : N/A

Business/Organization/Agency :

Submission Input :

We need more traffic lanes, not less. We voted down mass transit, don't put it on this bridge. We need a third bridge, Fairview to Camas or Washougal. Most everyone agrees with the above. The taxpapers voted down building a new bridge where this one is. With the financial hole WA State is in, where will the $$$ come from. We voted down tolls. The folks in charge blew all the money studying this brige, all all because they didn't consider water transportation, HUGE error.

IBR Draft SEIS - RECORD #3413 DETAIL

First Name :	Edward
Last Name :	Buck-Shannon
Attachments :	DSEISBuckShannon_3413_20241118_Original.pdf (4 kb)

IBR Draft SEIS - RECORD #3413 DETAIL

Submission Date :	11/18/2024
First Name :	Edward
Last Name :	Buck-Shannon
Business/Organization/Agency :	Ecumenical Ministries of Oregon

Submission Input :

First Name:
Edward

Last Name:
Buck-Shannon

Business or Organization:
Ecumenical Ministries of Oregon

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Topic Area:
Neighborhoods and Equity

Comment:
Ecumenical Ministries of Oregon is a state-wide association of faith groups dedicated to serving Oregon's disadvantaged communities through our direct service programs and advocacy. We recognize the need for seismic improvement projects like the IBR, especially in such an important transportation corridor. However, we do not support the project as it stands. The current plan would misallocate billions of dollars to an unnecessary freeway expansion. The potentially disastrous health and climate impacts of the project would be disproportionately borne by disadvantaged communities.

Our programs like the Northeast Emergency Food Program, and HIV Day Center serve thousands of BIPOC, immigrant, and low-income clients throughout Portland and the IBR must consider the needs of these

communities. For that reason, we support the ODOT Equity and Mobility Advisory Committee's recommendation for a 50% toll discount for low-income households and share the Just Crossing Alliances' disappointment that such a 50% discount is not assumed to be in place at the inception of pre-completion tolling.

Lastly, as a state-wide organization, we believe that the $3 billion freeway expansion would disproportionately benefit wealthy Portland residents. It is our position that anything more than the $2 billion necessary to replace the Interstate Bridge would be better invested in communities around the state. The current IBR is a freeway expansion disguised as seismic resilience. Ecumenical Ministries of Oregon joins the Right Crossing Alliance in calling for a downsized IBR that benefits all Oregonians.

JCA comment #: 904

IBR Draft SEIS - RECORD #3414 DETAIL

First Name :	Adam
Last Name :	Gaya
Attachments :	DSEISGaya_3414_20241118_Original.pdf (4 kb)

IBR Draft SEIS - RECORD #3414 DETAIL

Submission Date : 11/18/2024
First Name : Adam
Last Name : Gaya
Business/Organization/Agency :

Submission Input :

First Name:
Adam

Last Name:
Gaya

Business or Organization:
n/a

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
As a Portland resident living in the Alberta neighborhood close to I-5 and who regularly uses the I-5 bridge I feel strongly that and bridge replacement project should incorporate and prioritize accessible and pleasant paths for people walking, biking and rolling. This means; multi-modal paths should be accessible to the MAX and public transportation, the grade of such paths should be reasonable and not an outrageous climb, and this path should have regular bump outs for people to rest and take in the magnificent view of the river. Accessibility for

multi-modal transportation also means features like protective barriers, well-lit routes and rain/shade protection on paths. A commitment to inclusive design prioritizes the safety and comfort of all ages, abilities, and backgrounds, especially underserved and vulnerable groups.

Prioritizing these features instead of continuing to subsidize single passenger vehicles makes the most sense for the climate, and long term economics.

JCA comment #: 903

IBR Draft SEIS - RECORD #3415 DETAIL

First Name :	NA
Last Name :	NA
Attachments :	DSEIS-NA_3415_20241118_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #3415 DETAIL

Submission Date : 11/18/2024

First Name : NA

Last Name : NA

Business/Organization/Agency :

Submission Input :

Not liking Light rail entering into our community. Bad idea! How about building bridges connecting Or & Wa in St Helens and Fishers Landing instead of altering a landmark bridge.

I don’t see this helping congestion in delta park

IBR Draft SEIS - RECORD #3416 DETAIL

First Name :	Walter
Last Name :	Valenta
Attachments :	DSEIS-3416_Valenta_Original.pdf (1 mb)

IBR Draft SEIS - RECORD #3416 DETAIL

Submission Date :	11/19/2024
First Name :	Walter
Last Name :	Valenta
Business/Organization/Agency :	
Attachments :	BNA Comment Water Access Point.pdf (2 mb)

Submission Input :

Comment submitted to the Interstate Bridge Replacement Draft SEIS

By Walter Valenta

[redacted]
[redacted]
[redacted]

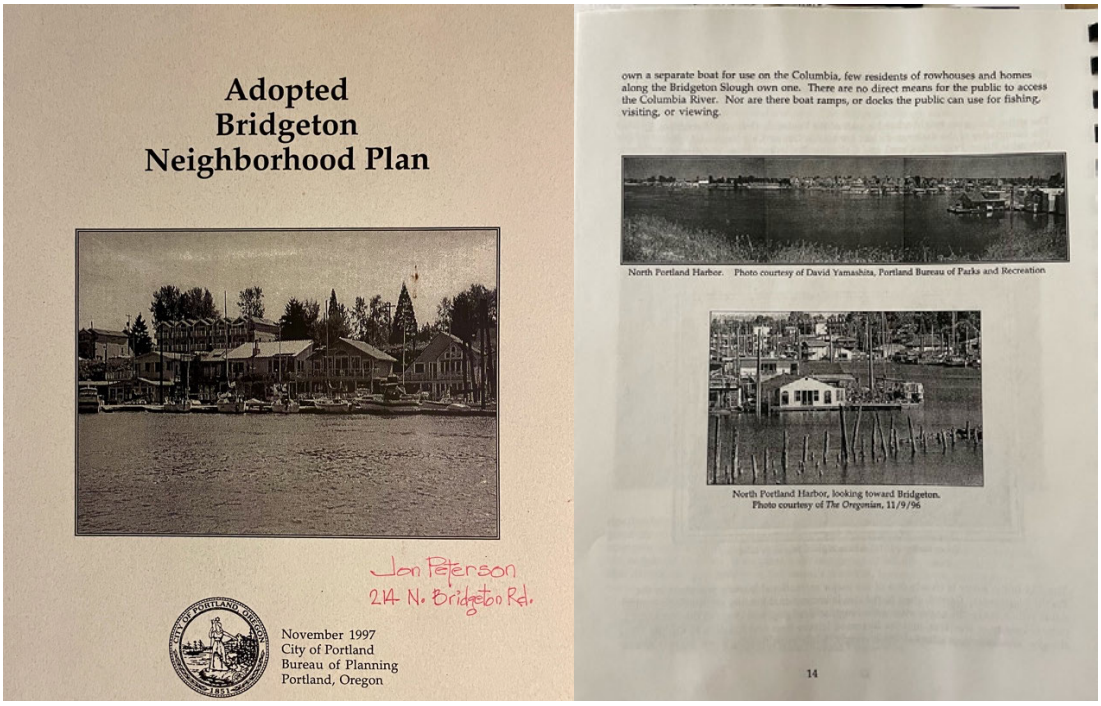
12 November 2024

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

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Sincerely,

Bridget Bayer, Board Chair
and
Bridgeton Neighborhood Association Board Members

IBR Draft SEIS - RECORD #3417 DETAIL

First Name :	Christina
Last Name :	E. Donehower
Attachments :	DSEIS-3417_Cowlitz_Original.pdf (797 kb) image001.png (20 kb) image002.png (29 kb) IBR Program Draft SEIS Comments_Cowlitz Indian Tribe_11.18.2024 (Signed).pdf (797 kb)

COWLITZ INDIAN TRIBE

November 18, 2024

Greg Johnson, Program Administrator
Interstate Bridge Replacement Program
500 Broadway Street, Suite 200
Vancouver, WA 98660

SENT VIA EMAIL:
draftseis@interstatebridge.org

RE: Interstate Bridge Replacement Program Draft SEIS Tribal Comment

Dear Mr. Johnson:

Thank you for the opportunity to comment on the Interstate Bridge Replacement (IBR) Program's Draft Supplemental Environmental Impact Statement (Draft SEIS). The Draft SEIS evaluates impacts and alternatives of proposed bridge, transit, active transportation, and highway improvements within a 5-mile corridor of I-5 between Portland, Oregon, and Vancouver, Washington.

The Cowlitz Indian Tribe (Tribe) is a federally recognized Indian Tribe of southwest Washington and northern Oregon. As the IBR Program is aware, the IBR project footprint is located within the Tribe's aboriginal territory, which includes lands on both sides of the lower Columbia River. Since Time Immemorial, Cowlitz people have maintained a continuous presence in this area. The historic Cowlitz Trail, a traditional route for trade, transportation, and relationship-building, underlies much of what is now I-5 between the Columbia River and the southern reaches of Puget Sound. The Tribe's Reservation, home to Tribal enterprises and several government offices, is in nearby Ridgefield, Washington, a short drive on I-5 from the IBR project. The Tribe also has offices in Vancouver, Washington.

The IBR project will affect the Tribe's ancestral lands, natural and cultural resources, and self-determination and economic development initiatives. The Tribe appreciates the IBR team's coordination and consultation in development of the Draft SEIS. Overall, the Tribe supports the IBR Program's proposal to replace the aging I-5 bridge over the Columbia River with a safer, seismically resilient multimodal structure. However, the Tribe remains concerned about project-related impacts. It is critical that meaningful Tribal consultation continues to ensure there will be sufficient mitigation of adverse effects.

The Tribe wishes to submit the following specific comments on the Draft SEIS:

PO Box 2547 ∞ Longview, WA 98632-8594 ∞ (360) 577-8140 ∞ Email: wiyall@cowlitz.org

1) 3.3 Property Acquisitions and Displacements / 3.3.3 Long-Term Benefits and Effects

Fort Vancouver and the surrounding areas are of great historical and cultural importance to the Cowlitz Indian Tribe. The Cowlitz played a central role in the fur trade and controlled a trade route crucial to Fort Vancouver in the early 1800s; Cowlitz people historically lived in the area adjacent to Fort Vancouver and in the surrounding area. Figures 3.3-2 (p. 3.3-5) and 3.3-3 (p. 3.3-6) depict "Partial Acquistion" for the entirety of Fort Vancouver and the landing along the Columbia River (opposite SR-14 from the Fort itself). The Acquisitions Technical Report (Appendix Tables A4 and A5, p. A4-1 to A5-3) identifies permanent and temporary impacts to portions of parcel #38279914 at 1105 E 5th St, Vancouver, 98661 (Fort Vancouver National Historic Site), but does not indicate which areas will be impacted. The Draft Section 4(f) Evaluation provides additional context on use of the Fort Vancouver National Historic Site for the various Modified Locally Preferred Alternative (LPA) design options and anticipates that the proposed use would result in a greater than *de minimis* impact. As designs progress and more details become available, and there is further Tribal consultation, the Tribe will have more comments on this topic. For now, we remain concerned about potential adverse effects to cultural resources in and around Fort Vancouver and the Cowlitz Trail.

2) 3.5 Neighborhoods and Equity / Terms and Definitions

The Tribe is disappointed to see that Tribal Governments are included in the IBR Program's definition of "equity priority communities," i.e., those who have experienced discrimination based on identity or status (p. 3.5-1). Unlike other equity priority communities, federally recognized Tribes are sovereign nations, to whom the Federal Government owes a trust responsibility. Tribes have distinct political, legal, cultural, social, and economic interests that should not be overlooked or minimized (and that are not equivalent to impacts to equity priority communities) when examining environmental justice issues.

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The section on Tribal Government Consultation characterizes the government-to-government consultation process as one that "enables [T]ribal [G]overnments to understand the Program, ask questions, and participate in issue identification and solution strategies (…)" (p. 3.5-24). The Tribe recommends rephrasing this section for greater alignment with the guiding principles of Executive Order 13175 (65 FR 67249) and the Presidential Memorandum on Uniform Standards for Tribal Consultation (87 FR 74479). Meaningful consultation is a two-way exchange of information. It is designed to ensure that all applicable information is readily available to the parties involved, so they can strive for informed consensus on issues with Tribal implications.

4) 3.8 Cultural Resources / 3.8.2 Existing Conditions

Figures 3.8-1 (p. 3.8-7), 3.8-3 (p. 3.8-18), and 3.8-4 (p. 3.8-23) show a gap in the Area of Potential Effects (APE) between the shipping lanes of the Columbia River and the northern riverbank along Fort Vancouver. There is no apparent rationale for this gap. The Tribe recommends that this stretch of shoreline be included in the APE so that direct or indirect effects on any cultural resources that lie within it can be adequately assessed.

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The Draft SEIS must include a more robust and detailed statement regarding Tribal land occupation and other elements of Native American historical involvement prior to 1824 within (and in the vicinity of) the APE. The Tribe recommends that further discussion of Tribal involvement in trade and other activities at Fort Vancouver also be included (p. 3.8-10, "Washington" subheading). This additional description of Tribal historical connections is needed to more fully explain the historical context as the backdrop for the subsequent discussion of potential impacts to Tribal cultural resources, archeological and burial sites – particularly given the extent of affected cultural resources already identified within the APE.

5) 3.8 Cultural Resources / 3.8.3 Direct Effects

Table 3.8-9 (p. 3.8-37) states the following with regards to the Vancouver Barracks Post Hospital:

> *The Modified LPA could result in physical destruction or damage to the property. Vibratory effects from the replacement of the highway retaining wall and upgrades to the roadbed are expected to impact the Post Hospital, which is a contributing component of this district. Physical damage from vibration is anticipated due to the building's unreinforced masonry construction and proximity to construction activities (as close as 6 feet). Although the severity of potential damage from construction-related vibration cannot be readily evaluated in advance, a worst-case scenario assumes the potential for structural damage to the Post Hospital. Such damage would render the building unusable or result in its partial or complete collapse* (...).

Just as historic buildings can be damaged by construction-related vibration, so too can Tribal cultural resources. Most of Chapter 3.11 and the Noise and Vibration Technical Report focus on noise

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impacts to structures and associated mitigation measures. Tribes hold Indigenous Knowledge of cultural resources that may not be found in public records or archaeological databases. As the project advances and the Draft Programmatic Agreement concerning implementation of Section 106 of the National Historic Preservation Act is finalized, continued dialogue with Tribes will be essential for avoiding and minimizing impacts to sensitive cultural resources.

6) 3.16 Ecosystems / 3.16.2 Existing Conditions

Cowlitz people have always been stewards of the lower Columbia River Basin. The Tribe's culture and well-being depend upon clean water, abundant fish and wildlife, and a healthy, flourishing river ecosystem. The Tribe partners with federal, state, and local agencies, non-governmental organizations, and other Tribes across the basin to implement fish and wildlife habitat restoration projects and promote recovery of at-risk species.

The IBR project represents a major transportation infrastructure project in a key stretch of the Columbia River. It has a large physical footprint, a lengthy construction timeline (up to 15 years), and requires extensive in-water work spanning many years. It will involve temporary and permanent alteration of terrestrial and aquatic habitat, water quality effects, impacts associated with disturbance and noise, shading, flow path changes, predation pressure, and more. Many of the impacts are complex and difficult to quantify. Some could affect fish migration and foraging patterns as well as fishing opportunities.

Table 3.16-2 (p. 3.16-9 to 3.16-11) identifies "aquatic species of interest" that may occur within the study area. As the Tribe has previously shared with the IBR team, the Tribe is especially concerned about project-related impacts to anadromous fish (i.e., multiple salmonids, Pacific eulachon, Pacific and river lamprey, green and white sturgeon). Anadromous fish stocks across the basin are already struggling. All depend on healthy habitat in the lower Columbia River and estuary as they head out to sea and upon their return to freshwater. The IBR project will harm these culturally and ecologically significant fish species, underscoring the importance of a robust mitigation and conservation plan.

7) 3.16 Ecosystems / 3.16.3 Long-Term Benefits and Effects

According to Table 3.16-8 (p. 3.16-20), each of the proposed bridge configurations will have substantial ecosystem effects. A single-level movable span configuration with two auxiliary lanes has often been characterized in IBR Habitat Mitigation Workgroup meetings as a "worst-case scenario" since it would result in the greatest amount of benthic habitat impact, overwater shading (water surface shading and elevated deck shading), and impervious surface area. The Tribe favors a bridge design that will meet the project purpose/need with the least impact on natural and cultural

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resources. From the options presented to date, the Modified LPA with double-deck fixed-span bridge configuration and a single auxiliary lane appears to strike this balance. All the same, the Tribe recognizes that design components are still being developed, and that selection and further refinement of preferred options could affect the scope and scale of impacts, benefits, and mitigation measures.

8) 3.16 Ecosystems / 3.16.4 Temporary Effects

The Draft SEIS discusses in-water work timing for the IBR project. It states that impact pile driving would occur from September 15th to April 15th of each year, in-water debris removal with a bucket dredge would occur from November 1st to February 28th of each year, and that other in-water and overwater construction activities would be allowed year-round if they are conducted in compliance with permit conditions (p. 3.16-29).

In-water work windows are a useful tool for protecting fish and other aquatic life from disturbance, injury, and mortality, but they have limitations. Some species and life stages may be present year-round. Others may be poorly documented or have variable presence in an area. In either case, the Tribe's opinion is that general timing restrictions, as currently outlined, will not be adequate. Moreover, for the IBR project, the proposed in-water work timing represents a departure from standard in-water work windows in the lower Columbia River (see the Ecosystems Technical Report, p. 5-1 to 5-2). The timing was selected as a compromise between 1) extending the number of in-water work seasons and increasing project costs or 2) avoiding the most sensitive periods for some salmonids. The proposed "relaxed" in-water work timing for the IBR project will lead to even more impacts to anadromous fish.

Pacific eulachon and chum salmon are among focal species for the Cowlitz Indian Tribe. The Tribe is very concerned that their typical peak run timing fully overlaps the selected IBR in-water work windows for impact pile driving and in-water debris removal. Federally threatened eulachon are broadcast spawners whose eggs adhere to sandy substrate. They spawn in the mainstem and several tributaries below Bonneville Dam, often reaching peak tributary abundance in February. Federally threatened chum salmon spawn in the mainstem just upstream of the I-205 bridge, typically from November to December. Due to their small size at outmigration, young chum salmon may be especially vulnerable to in-water work effects.

The Tribe mentions these examples to reiterate the importance of a robust mitigation and conservation plan. The plan should provide clear benefits to fish stocks that may be adversely affected by the IBR project.

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The Draft SEIS includes few specifics on compensatory mitigation plans. The Tribe supports the IBR Program's efforts to adhere to the mitigation sequence (i.e., designing the project in ways that first avoid, minimize, rectify, and reduce impacts to natural resources to the greatest extent practicable). For unavoidable impacts, the Tribe does not object to the IBR Program's proposal to prioritize purchase of credits from area mitigation banks in both Oregon and Washington to satisfy regulatory requirements.

Regardless of the mitigation mechanism selected, the Tribe urges the IBR Program to adopt a mitigation framework that adheres to the precautionary principle, maintains habitat functions and values, and ensures that compensation is high enough to buffer against risk of mitigation failure or underperformance. This will be especially important as climate change exerts increasing effects on natural systems, including mitigation sites. The Tribe also recommends effectiveness monitoring and adaptive management components to ensure that performance standards are met on the ground.

The Ecosystems Technical Report contemplates net benefits to some ecosystem resources from compensatory mitigation and alludes to the IBR Program's conservation initiative, or what the Tribe understands as a commitment by the IBR Program to provide "conservation uplift" to species and habitat types impacted by the project; this initiative would go beyond compensatory mitigation required by federal, state, and local regulatory agencies. The Tribe looks forward to receiving more details on this initiative. The Tribe would like to see a suite of projects funded and implemented that directly benefit aquatic species of concern to Tribes.

10) Ecosystems Technical Report / 7. Proposed Mitigation for Adverse Effects

Section 7 of the Ecosystems Technical Report identifies regulatory requirements and best management practices for avoiding and minimizing project-related effects on ecosystem resources. The Tribe recommends addressing invasive species prevention and response in this section. There is a reference to cleaning and inspecting equipment for noxious weeds on p. 7-3, which is appropriate, but the Tribe is also concerned about other invasive plants, animals, soil residue or debris that could harbor pests or pathogens. Invasive species pose serious threats to Columbia River ecosystems and economies, and preventing their spread is the best approach for avoiding their many costs and impacts.

Thank you for considering the Tribe's comments, and for including them in the public record of comments on the Draft SEIS. The Tribe looks forward to further coordination and consultation with the IBR team. Collaborating on ways to avoid, minimize, and mitigate project-related impacts before they arise will be critical for successful outcomes. For questions concerning this letter, please

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Sincerely,

COWLITZ INDIAN TRIBE

Bill Iyall (Nov 18, 2024 15:51 PST)

William B. Iyall, P.E.
Tribal Chairman

CC: Kassandra Rippee, Tribal Liaison, IBR Program
Hayli Reff, Cultural Resources Program Manager, IBR Program
Chris Regan, Environmental Manager, IBR Program

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Tribal Chairman

CC: Kassandra Rippee, Tribal Liaison, IBR Program
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IBR Draft SEIS - RECORD #3418 DETAIL

First Name :	Andrew
Last Name :	Neerman
Attachments :	DSEISNeerman_3418_20241118_Original.pdf (4 kb) Stephen-Meyer-MIT-quote.docx (5 kb)

IBR Draft SEIS - RECORD #3418 DETAIL

Submission Date :	11/18/2024
First Name :	Andrew
Last Name :	Neerman
Business/Organization/Agency :	Beacon Sound

Submission Input :

First Name:
Andrew

Last Name:
Neerman

Business or Organization:
Beacon Sound

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Climate Change

Comment:
This is a grotesquely oversized fossil-fuel-centric project that reflects the deep corruption and rot that has

infected our society and culture. The ossified and un-democratic political system pushing this project on us must be destroyed by any means necessary to protect what is left of the web of life that is necessary for our survival. In the meantime we need the people involved in this project, who surely in many instances have children of their own who are facing a bleak future, to show some principle and resign immediately. You should all be ashamed of yourselves for your spineless complicity in such a destructive boondoggle and I wish you a lifetime of dreamless sleep. There is no planet B.

Attachment (maximum one):
Stephen-Meyer-MIT-quote.docx

JCA comment #: 902

IBR Draft SEIS - RECORD #3419 DETAIL

First Name :	Jeroen
Last Name :	Kok
Attachments :	DSEIS-Kok_3419_20241118_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #3419 DETAIL

Submission Date :	11/18/2024
First Name :	Jeroen
Last Name :	Kok
Business/Organization/Agency :	

Submission Input :

Include light rail and robust bike infrastructure.
Interstate highways should not be tolled. Tolls are for expressways that provide for alternative routes where people are willing to pay for a faster drive time. I-5 is tolled nowhere else, keep it that way. Tolling one bridge will cause massive congestion worse than existing conditions. Tolling will put a disproportionate financial burden on local drivers, to pay for national highway infrastructure. This area has received no major highway infrastructure in over 40 years. Our taxes have gone elsewhere and it is now our turn to benefit from gas taxes paid over decades.
For project graphics and animation, shows vehicles traveling in all possible routes to make it more obvious which lanes are going where.

IBR Draft SEIS - RECORD #3422 DETAIL

First Name :	NA
Last Name :	NA
Attachments :	DSEIS-NA_3422_20241118_Original.pdf (2 kb)

IBR Draft SEIS - RECORD #3422 DETAIL

Submission Date : 11/18/2024
First Name : NA
Last Name : NA
Business/Organization/Agency :

Submission Input :

Interstate five is the major West Coast connection between Mexico and Canada, and therefore the bridge should be paid for totally with federal dollars. Locals should not be made to pay a nickel in tolls.

Freight i.e. tractor trailer traffic belongs on the railroad not the highway. These vehicles do the most amount of damage to roadways. Container freight is what railroads are all about. The majority of time there are multiple deaths and injuries in accidents, a tractor trailer is involved. The states and the fed have done very little to limit the size, weight , safety and emissions of these vehicles. If they do use the bridge, they should be made to pay its entire toll cost.

It is a fact that whenever you increase the capacity of a highway after a short period of time vehicle use will increase to where it was prior and congestion will return .Your statements to the contrary are untrue.

I have very little faith that you will make a safe crossing for pedestrians and bicycles, as most of your designs will end up as dangerous, ill-maintained pathways through homeless encampments for users. to try to safely navigate.

A number of years ago living in the West Minnehaha neighborhood, I was told by the chief WSDOT engineer, overseeing the installation of traffic lights at the Westbound exit ramp off SR 500 and 15th Ave. that there would be a signal trip for bicycles in the bicycle lane, with enough time to safely go through the intersection. This would be for bicycles going south on 15th Ave. to safely get across the intersection. Over the course of multiple conversations I was assured that this would be done and that overall this change would cause no additional delays to neighborhood traffic The signal trip was never installed and local traffic has suffered. Cyclist deal with this danger every day. This intersection was changed from a stop sign to a traffic light which is timed to so favor traffic coming off SR 500 that it constantly causes local residence using 15th Avenue incredible amounts of delay and danger getting across the intersection with the cars coming off the exit just backing up right through the intersection even when the light is red. WSDOT has done nothing to alleviate this problem. All you folks. do is prioritize car through traffic over pedestrian, bicycle, and local traffic safety. The reason I bring this up is because it highlights your lack of credibility and that this westbound SR 500. to I -5 northbound connection was supposed to be rectified as a part of the new bridge construction. No wonder people don’t trust you to tell them the truth and oppose the bridge project. No amount of your PR will do any good with this sort of past behavior.

IBR Draft SEIS - RECORD #3423 DETAIL

First Name :	William
Last Name :	Jacobson
Attachments :	DSEIS-3423_Jacobson_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #3423 DETAIL

Submission Date : 11/18/2024

First Name : William

Last Name : Jacobson

Business/Organization/Agency :

Submission Input :

Please make public transit, including light rail, a priority in the IBR project. While I appreciate the intent to make the new bridge both walkable and bike-friendly, Vancouver and SW Washington would benefit immensely from more mass transit options. Despite what conservative politicians would have you believe, there is real demand and desire for light rail options to connect to Portland and the airport. IF you build, we WILL use it!

IBR Draft SEIS - RECORD #3425 DETAIL

First Name :	Michael
Last Name :	Patterson
Attachments :	DSEIS-3425_Patterson_Original_Redacted.pdf (4 kb)

IBR Draft SEIS - RECORD #3425 DETAIL

Submission Date : 11/18/2024
First Name : Michael
Last Name : Patterson
Business/Organization/Agency :

Submission Input :

First Name:
Michael

Last Name:
Patterson

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
I'm opposed to expanding the I-5 bridge project. It has gone way over budget and will not solve traffic congestion. If it must come into the state, I would prefer mass-transit be a significant part of the project.

JCA comment #: 901

IBR Draft SEIS - RECORD #3428 DETAIL

First Name :	Derek
Last Name :	Malsam
Attachments :	Jubitz_Original.pdf (342 kb) Jubitz Draft SEIS Public Comment.pdf (49 kb)

JUBITZ CORPORATION

November 18, 2024

Interstate Bridge Replacement

Re: Draft SEIS Public Comment

Jubitz Corporation operates a truck stop on Vancouver Way that requires easy access to and from I-5. We want to express two concerns we have in review of the Draft SEIS:

1. **Access to Vancouver Way from both directions of I-5.** The current design creates a series of sharp turns that are both difficult and confusing for semi traffic to manage. We request consideration for a new undercrossing on MLK at Hayden Meadows to allow one direction of traffic to access Vancouver Way from MLK. The current design includes an onramp back to MLK that can remain for traffic heading toward I-5. Keeping all freeway traffic on MLK versus directing through Delta Park traffic will reduce driver confusion, congestion and improve safety.

2. **Lack of detail regarding the temporary construction easement on our property.** Part of our property where we operate a truck service center and paid parking area is marked for temporary construction easement. Of particular concern, is the scope of this easement including duration, size and what equipment will be stored on our property. Maneuverability of the yard is very important so we can service trucks up to 73 feet on the property efficiently. We fear there could be a potential economic impact on our business due to these easements.

Sincerely,

Derek Malsam
Chief Financial Officer

33 N.E. Middlefield Road
Portland, Oregon 97211

P 503.283.1111
E info@jubitz.com

JUBITZ CORPORATION

November 18, 2024

Interstate Bridge Replacement

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Sincerely,

Derek Malsam
Chief Financial Officer

33 N.E. Middlefield Road
Portland, Oregon 97211

P 503.283.1111
E info@jubitz.com

IBR Draft SEIS - RECORD #3429 DETAIL

First Name :	Don
Last Name :	Mattes
Attachments :	DSEIS-3429_Mattes_Original.pdf (5 kb)

IBR Draft SEIS - RECORD #3429 DETAIL

Submission Date : 11/18/2024
First Name : Don
Last Name : Mattes
Business/Organization/Agency :

Submission Input :

NO light rail.

On Mon, Nov 18, 2024, 4:57?PM Don Mattes <dons63chev@gmail.com> wrote:

> 1. NO tolls
> 2. Light rail
> 3. Yes more traffic lanes
> 4. Use the income taxes paid by Washintonian to plan and build a new
> crossing ASAP.
>
> On Mon, Nov 18, 2024, 12:00?PM Interstate Bridge Replacement Program <
> info@interstatebridge.org> wrote:
>
>> [image: Interstate Bridge Replacement program logo]
>> Last chance: 60-day public comment period closes at 11:59 p.m. PST today
>>
>> Today is the last chance to provide comment on the Interstate Bridge
>> Replacement Program’s Draft Supplemental Environmental Impact Statement
>> (SEIS). The 60-day public comment period will close at 11:59 p.m. PST
>> today, Monday, Nov. 18.
>>
>> This is the last chance for community members to provide their input on
>> the Draft SEIS that covers proposed program investments, design options and
>> the expected impacts to transportation, environment and community.
>>
>> Additional information and documents can be found here
>> <https://interstatebridge.us7.list-
manage.com/track/click?u=40d641e35857d4cc409012952&id=394c3d8189&e=dd6a668df6>
>> .
>> Public comment period ends today for Section 106 – Get your comments in
>> by 11:59 p.m. PST
>>
>> The deadline to provide the IBR Program with public input on the
>> project’s anticipated effect on historic properties and cultural resources
>> is 11:59 p.m. PST, today, Nov. 18. The IBR Program is providing
>> opportunities for public comment in compliance with Section 106 of the
>> National Historic Preservation Act (NHPA).
>>

>> Historic properties within the IBR Program’s Area of Potential Effect
>> (APE) were identified through field survey, consultation and background
>> research. These properties were evaluated for their significance and
>> consideration under Section 106. Any adverse effects to historic properties
>> or cultural resources will be avoided or minimized and mitigated where
>> necessary. The evaluation of each property is documented in a Determination
>> of Eligibility (DOE) form. For properties that are subject to Section 106
>> consideration, a Finding of Effect (FOE) form was prepared to evaluate
>> effects from IBR Program investments.
>>
>> More information on the project’s Section 106 considerations can be found
>> here
>> <https://interstatebridge.us7.list-
manage.com/track/click?u=40d641e35857d4cc409012952&id=b07cc349b0&e=dd6a668df6>
>> .
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>> ¡Información disponible en su idioma!
>> <https://interstatebridge.us7.list-
manage.com/track/click?u=40d641e35857d4cc409012952&id=c3183f87cd&e=dd6a668df6>
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>> Ei porous mi kawor non fosun fenuwom!
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>> Macluumaad ku qoran luqadaada ayaa la helayaa!
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manage.com/track/click?u=40d641e35857d4cc409012952&id=3894b246be&e=dd6a668df6>
>>

>> Hi?n có s?n thông tin b?ng ngôn ng? c?a quý v?!
>> <https://interstatebridge.us7.list-
manage.com/track/click?u=40d641e35857d4cc409012952&id=c0caa32c37&e=dd6a668df6>
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>> <https://interstatebridge.us7.list-
manage.com/track/click?u=40d641e35857d4cc409012952&id=b3f056e750&e=dd6a668df6>
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>> <https://interstatebridge.us7.list-
manage.com/track/click?u=40d641e35857d4cc409012952&id=d2785bd344&e=dd6a668df6>
>> [image: Facebook]
>> <https://interstatebridge.us7.list-
manage.com/track/click?u=40d641e35857d4cc409012952&id=d47b3d04df&e=dd6a668df6>
>> [image: Twitter]
>> <https://interstatebridge.us7.list-
manage.com/track/click?u=40d641e35857d4cc409012952&id=4ca5e8d98f&e=dd6a668df6>
>> [image: Link]
>> <https://interstatebridge.us7.list-
manage.com/track/click?u=40d641e35857d4cc409012952&id=c03216f184&e=dd6a668df6>
>> [image: YouTube]
>> <https://interstatebridge.us7.list-
manage.com/track/click?u=40d641e35857d4cc409012952&id=5930bc1af3&e=dd6a668df6>
>> [image: LinkedIn]
>> <https://interstatebridge.us7.list-
manage.com/track/click?u=40d641e35857d4cc409012952&id=7e5337f27d&e=dd6a668df6>
>> [image: Website]
>> <https://interstatebridge.us7.list-
manage.com/track/click?u=40d641e35857d4cc409012952&id=752e652238&e=dd6a668df6>
>>
>> Emails us at info@interstatebridge.org or call 360-859-0494 <3608590494>
>> (Washington), 503-897-9218 <5038979218> (Oregon), 888-503-6735
>> <8885036735> (toll-free).
>>
>> *The IBR program is subject to Oregon
>> <https://interstatebridge.us7.list-
manage.com/track/click?u=40d641e35857d4cc409012952&id=4310a50c43&e=dd6a668df6> and Washington
>> <https://interstatebridge.us7.list-
manage.com/track/click?u=40d641e35857d4cc409012952&id=5fdb4ecaa0&e=dd6a668df6> public
>> records laws. Therefore, public comments and questions (verbal or written)
>> may be made available to anyone requesting them for non-commercial
>> purposes.*
>>
>> *Americans with Disabilities Act (ADA) and Civil Rights Title VI

>> accommodations in Oregon*
>> For ADA (Americans with Disabilities Act) or Civil Rights Title VI
>> accommodations, translation/interpretation services, or more information
>> for those in Oregon, please call 503-731-4128, TTY 800-735- 2900 or Oregon
>> Relay Service 711.
>>
>> *Americans with Disabilities Act (ADA) and Title VI accommodations in
>> Washington*
>> Accommodation requests for people with disabilities in Washington can be
>> made by contacting the WSDOT Diversity/ADA Affairs team at
>> wsdotada@wsdot.wa.gov or by calling toll-free, 855-362-4ADA (4232).
>> Persons who are deaf or hard of hearing may make a request by calling the
>> Washington State Relay at 711. Any person who believes his/her Title VI
>> protection has been violated, may file a complaint with WSDOT's Office of
>> Equal Opportunity (OEO) Title VI Coordinator by contacting (360) 705-7090.
>> *Copyright © 2024 Interstate Bridge Replacement Program, All rights
>> reserved.*
>> You are receiving this email because you opted in via our website.
>>
>> *Our mailing address is:*
>> Interstate Bridge Replacement Program
>> 500 Broadway Street, Suite 200
>> Vancouver, WA 98660
>>
>> Add us to your address book
>> <https://interstatebridge.us7.list-manage.com/vcard?u=40d641e35857d4cc409012952&id=fe50a65806>
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>> Want to change how you receive these emails?
>> Unsubscribe from this list
>> <https://interstatebridge.us7.list-
manage.com/unsubscribe?u=40d641e35857d4cc409012952&id=fe50a65806&t=b&e=dd6a668df6&c=9d3800b
eac>
>> .
>>
>>

IBR Draft SEIS - RECORD #3431 DETAIL

First Name :	Maren L.
Last Name :	Calvert
Attachments :	119025_JT Marine Comments on IBR Draft SEIS.pdf (203 kb) image001.png (456 bytes) image002.png (5 kb) JT Marine Comments on IBR Draft SEIS.pdf (203 kb)

Schwabe

November 18, 2024

Maren L. Calvert
Admitted in Washington, Oregon,
California and Hawaii
D: 360-597-0804
mcalvert@schwabe.com

VIA EMAIL: info@interstatebridge.org; ibr-row@interstatebridge.org; draftseis@interstatebridge.org

Interstate Bridge Replacement Program
Attn: Draft SEIS Public Comment
500 Broadway, Suite 200
Vancouver WA 98660

RE: Comments on the Draft Supplemental Environmental Impact Statement on behalf of JT Marine, Inc.

Dear Interstate Bridge Replacement Team:

This office represents JT Marine Inc. ("JT Marine") regarding impacts to its business operations that will be impacted by the Interstate Bridge Replacement project (hereinafter, "IBR"). This letter provides JT Marine's comments on the IBR's Draft Supplemental Environmental Impact Statement (hereinafter, "Draft SEIS").

JT Marine is concerned about substantial deficiencies in the Draft SEIS that are directly related to JT Marine's access to and navigation on the Columbia River, as well as its interests in the waterfront environment. To avoid duplication, JT Marine fully joins in and adopts the comments submitted by Columbia Business Center ("CBC").

In addition, despite ongoing conversations with the IBR about impacts to multiple vessels operated by JT Marine and its customers, the Navigation Impact Report ("NIR") of the Draft SEIS identifies only eight vessels that will be impacted by the proposed decreased heights of the replacement bridge. Table ES-1. This statement is incorrect. The eight vessels listed are vessels that cannot be modified to a vessel height below 116 feet. That means those vessels will be *prohibited* from transiting under the new bridge, they are not merely "impacted" by it. Prohibiting the commerce supported by eight current vessels and all future vessels that exceed 116 feet will impose a significantly negative environmental and financial impact on the community. The Draft SEIS fails to acknowledge or analyze this impact, let alone quantify it.

Moreover, the number of vessels that will be *impacted* by the proposed new bridge height is not accurately reported.[1] Any vessel that currently runs, or in the future may run, with a vessel height (plus 10 foot clearance height) greater than 116 feet will be *impacted*. Data JT Marine previously provided to the IBR demonstrates that more than thirteen vessels operated by JT Marine's

[1] "impact," www.dictionary.com/browse/impact, (" to have an impact or effect on; influence; alter"), accessed on November 18, 2024.

customers, in addition to JT Marine's vessel *DB Taylor*, will be negatively impacted. Each of those vessels and operators will have to incur the time, expense, and delay of modifying their vessels during each navigation attempt under the proposed new bridge. The Draft SEIS recognizes this work will need to be done, but discounts and does not even attempt to quantify, the negative environmental and financial impacts this will have on those businesses, commerce, and the local community. Moreover, the Draft SEIS does not identify *where* those alleged vessel modifications could possibly be done or whether the work to be performed by those vessels can be accomplished once the vessels are modified.

Rather than avoid the negative impacts, the NIR focuses on mitigating the impacts. NIR section 2.18.2.2 outlines four elements for mitigation discussion and documentation the IBR proposes to have with impacted vessel owners. This is inadequate. NEPA requires actual data and actual impacts to be analyzed before the SEIS is finalized. Conducting those conversations after the Draft SEIS is published prohibits any public review of or comment on the proposed mitigation options, in violation of NEPA.

This is important because the currently proposed mitigation options are incomplete and are likely infeasible. For example, mitigation options 1 and 2 do not adequately identify the costs, feasibility, or delays to be incurred by each *impacted* vessel (significantly more than eight vessels) from boom and/or spud removal. Option 4 (reconfiguring the crane) will only work of the reconfiguration is technically feasible and if the crane work to be performed on the other side of the bridge can be accommodated by a reconfigured boom/crane. Moreover, the cranes/booms on a vessel are mounted at their current heights in their current configuration for business reasons. Changing those features of the boom/crane will change the types and scopes of work the vessel operator can perform. The proposed reconfiguration work might trigger a requirement to get the cranes inspected and recertified each time the vessel passes under the bridge. The NIR fails to analyze the hard costs, soft costs, and delays from such modifications or where such modifications and inspections could be performed.

Option 5, proposing to use a mobile crane rather than a vessel crane, defeats the entire business purpose for a water-borne vessel operator. Essentially, this option proposes that a vessel-borne crane operator could refer all of its business to a land-based competitor to mitigate harm/business losses. That its nonsensical. Option 5 simply destroys a vessel-borne crane operator's business model.

Page 2-77 of the NIR indicates that the boom of the DB Taylor could be lowered during transit, but it does not explain the cost, feasibility, or location where such modifications would occur. The NIR asserts that a mitigation agreement between the IBR and JT Marine was never reached because "the vessel owner made a decision to terminate negotiations." JT Marine terminated negotiations because the IBR's proposed mitigation is infeasible and financially crippling. Moreover, simply modifying one of JT Marine's vessels does not begin to "mitigate" the millions of dollars of damages JT Marine will suffer from the loss of business from vessels exceeding 116 feet at the Columbia Business Center.

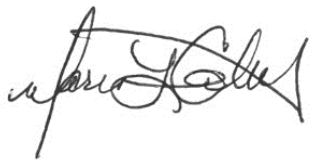
Tug assists, timed bridge lifts, and a variety of other industry standard best practices and navigation-based alternatives could mitigate many of the harms caused by the proposed lower-height bridges. The Draft SEIS currently fails to identify or reasonably consider these.

The Draft SEIS, therefore, does not provide an adequate analysis of the environmental, financial, and navigation impacts of and alternatives to the proposed new bridges and it misrepresents the facts the IBR has been given. The Draft SEIS does not identify secondary (indirect) and cumulative effects of its proposals on the navigational community in Portland, Vancouver, and—due to the ship-manufacturing capabilities of the CBC that will be lost—the entire Nation from the IBR's project. This letter, therefore, 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 my client's concerns, to minimize the damages from the IBR project. 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

Schwabe

November 18, 2024

Maren L. Calvert
Admitted in Washington, Oregon,
California and Hawaii
D: 360-597-0804
mcalvert@schwabe.com

VIA EMAIL: info@interstatebridge.org; ibr-row@interstatebridge.org; draftseis@interstatebridge.org

Interstate Bridge Replacement Program
Attn: Draft SEIS Public Comment
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Vancouver WA 98660

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This is important because the currently proposed mitigation options are incomplete and are likely infeasible. For example, mitigation options 1 and 2 do not adequately identify the costs, feasibility, or delays to be incurred by each *impacted* vessel (significantly more than eight vessels) from boom and/or spud removal. Option 4 (reconfiguring the crane) will only work of the reconfiguration is technically feasible and if the crane work to be performed on the other side of the bridge can be accommodated by a reconfigured boom/crane. Moreover, the cranes/booms on a vessel are mounted at their current heights in their current configuration for business reasons. Changing those features of the boom/crane will change the types and scopes of work the vessel operator can perform. The proposed reconfiguration work might trigger a requirement to get the cranes inspected and recertified each time the vessel passes under the bridge. The NIR fails to analyze the hard costs, soft costs, and delays from such modifications or where such modifications and inspections could be performed.

Option 5, proposing to use a mobile crane rather than a vessel crane, defeats the entire business purpose for a water-borne vessel operator. Essentially, this option proposes that a vessel-borne crane operator could refer all of its business to a land-based competitor to mitigate harm/business losses. That its nonsensical. Option 5 simply destroys a vessel-borne crane operator's business model.

Page 2-77 of the NIR indicates that the boom of the DB Taylor could be lowered during transit, but it does not explain the cost, feasibility, or location where such modifications would occur. The NIR asserts that a mitigation agreement between the IBR and JT Marine was never reached because "the vessel owner made a decision to terminate negotiations." JT Marine terminated negotiations because the IBR's proposed mitigation is infeasible and financially crippling. Moreover, simply modifying one of JT Marine's vessels does not begin to "mitigate" the millions of dollars of damages JT Marine will suffer from the loss of business from vessels exceeding 116 feet at the Columbia Business Center.

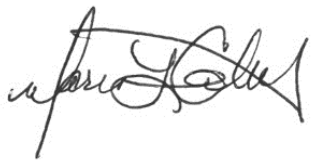
Tug assists, timed bridge lifts, and a variety of other industry standard best practices and navigation-based alternatives could mitigate many of the harms caused by the proposed lower-height bridges. The Draft SEIS currently fails to identify or reasonably consider these.

The Draft SEIS, therefore, does not provide an adequate analysis of the environmental, financial, and navigation impacts of and alternatives to the proposed new bridges and it misrepresents the facts the IBR has been given. The Draft SEIS does not identify secondary (indirect) and cumulative effects of its proposals on the navigational community in Portland, Vancouver, and—due to the ship-manufacturing capabilities of the CBC that will be lost—the entire Nation from the IBR's project. This letter, therefore, 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 my client's concerns, to minimize the damages from the IBR project. 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

IBR Draft SEIS - RECORD #3432 DETAIL

First Name :	Norman
Last Name :	Pheil
Attachments :	DSEIS-3432_Pheil_Original.pdf (6 kb)

IBR Draft SEIS - RECORD #3432 DETAIL

Submission Date :	11/19/2024
First Name :	Norman
Last Name :	Pheil
Business/Organization/Agency :	

Submission Input :

Bridge Fiasco: You will not accept my Commrnent./ No Toll No Destruction of functioning bridges. No Crime train allowed to cross RiverBore to three lane tunneled for cars only . [redacted]

IBR Draft SEIS - RECORD #3433 DETAIL

First Name :	Norman
Last Name :	Pheil
Attachments :	DSEIS-3433_Pheil_Original.pdf (6 kb)

IBR Draft SEIS - RECORD #3433 DETAIL

Submission Date : 11/19/2024

First Name : Norman

Last Name : Pheil

Business/Organization/Agency :

Submission Input :

Comment on proposed I==5Changes I propose that Light Rail not be allowed tp cross the Columbia River. Go ahead and takes steps to Upgrade The present bridges. Put tunnels under the River for Autos only, at least 3 lanes each way. Eliminating autos would s

Sincerely [redacted]

IBR Draft SEIS - RECORD #3434 DETAIL

First Name :	Kristy
Last Name :	Hicks
Attachments :	DSEIS-3434_Hicks_Original.pdf (6 kb)

IBR Draft SEIS - RECORD #3434 DETAIL

Submission Date : 11/18/2024
First Name : Kristy
Last Name : Hicks
Business/Organization/Agency :

Submission Input :

I would like to see the design be something that allows traffic flow to not be stalled on all flow lanes due to emergency on another portion.
For example a bicyclist, pedestrian or train needs assistance on that portion but all vehicular lanes are impacted for emergency vehicles.
Have the portions of the bridge designed for these portions be able to support emergency vehicles separately.
Thank you
Kristy Hicks
[redacted]

Sent from my iPhone

IBR Draft SEIS - RECORD #3435 DETAIL

First Name :	Les
Last Name :	Poole
Attachments :	DSEIS-3435_Poole_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #3435 DETAIL

Submission Date : 11/18/2024
First Name : Les
Last Name : Poole
Business/Organization/Agency :

Submission Input :

Re: Interstate Bridge Replacement Program

I have several decades of experience in transportation, logistics, and land use. I testified in opposition the CRC in 2015 because the concept was fatally flawed. The inadequate lane capacity and height limitations for light rail from the CRC have been carried over to the current proposal without an adequate resolution.

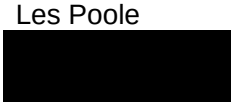
The document contains proposed traffic flow and speeds within the study area that cannot be achieved. The EIS from the CRC and the current document contain volumes of information that support the need for design changes before an approval.

I strongly endorse the extensive testimony submitted by the newly elected State Representative from District 18, John Ley. His observations on the traffic volume limits and potential tolling impacts are accurate and troubling.

The impacts generated by tolling require a study on how it would impact the I-205 Glen Jackson Bridge. I-205 and I-5 are clearly an integrated system. The document does not adequately address the impacts of tolling on the system. It lacks specificity as to how tolling would be utilized under current FTA guidelines, or when tolling would be expected to end.

In spite of the investment to this point, the document has unresolved or inadequate design criteria. It is not ready for the next phase of the process.

Thank you,
Les Poole



IBR Draft SEIS - RECORD #3436 DETAIL

First Name :	Maren L.
Last Name :	Calvert
Attachments :	DSEIS_3436_AAC_Original.pdf (209 kb) image001.png (456 bytes) image002.png (5 kb) Advanced American Comments on IBR Draft SEIS.pdf (209 kb)

Schwabe

November 18, 2024

Maren L. Calvert
Admitted in Washington, Oregon, California and Hawaii
D: 360-597-0804
mcalvert@schwabe.com

VIA EMAIL: info@interstatebridge.org; ibr-row@interstatebridge.org; draftseis@interstatebridge.org.

Interstate Bridge Replacement Program,
Attn: Draft SEIS Public Comment
500 Broadway, Suite 200
Vancouver WA 98660

RE: Comments on the Draft Supplemental Environmental Impact Statement on behalf of Advanced American Construction, Inc.

Dear Interstate Bridge Replacement Team:

This office represents Advanced American Construction, Inc. ("Advanced American ") regarding impacts to its business operations from the proposed Interstate Bridge Replacement project ("IBR"). This letter provides Advanced American's comments on the IBR's Draft Supplemental Environmental Impact Statement ("Draft SEIS").

Advanced American's shop office and home port are located downriver from the I-5 bridge. Advanced American, however, routinely provides marine services upriver from the I-5 bridge. Thus, the ability to transit under the bridge is crucial to Advanced American business operations.

As the Draft SEIS acknowledges, Advanced American operates many more vessels than those listed on pages 2-37 and 2-38 of the Navigation Impact Report ("NIR"). All of Advanced American's fleet is available to, and often does, transit the bridge location.

As the NIR acknowledges, Advanced American's *DB 4100* vessel would not be able to pass under a bridge height of 116 feet.[1] The NIR's subsequent conclusion, therefore, that "there is no substantial impact" at either the 116 foot or the 121-foot height is patently inaccurate.

Moreover, the NIR dismisses the impact this will have on Advanced American and the community as a whole. The NIR states, while marine construction will be limited between the I-5 bridges and Celilo Bridge, the Columbia River Gorge National Scenic Area restricts construction anyway, and downstream there are limited number of development sites. In other words, the NIR simply dismisses the impacts as though its mind were already made up. This violates the entire purpose of and intent for a NEPA analysis.

[1] NIR p. 2-42 ("Under the assumed conditions, the *DB 4100* would not be able to pass under a bridge height of 116 feet in the vessel's current configuration. The *DB 4100* could pass at least 90% of the days of each month of the year with a 10-foot air gap, and greater than 98% of days in all months of the year with a 5-foot air gap. The *DB 4100* would not be impacted under the assumed conditions for a bridge height of 121 feet. Accordingly, for the purposes of this analysis, there is no substantial impact at either height.").

As explained in the NIR, Advanced American would not be able to provide the marine services that it provided in 2019 on the Bonneville dam, with vessel *DB 125*, if the new bridge is built as proposed. In fact, five of Advanced American's operating vessels would be unable to perform work on the east side of the bridge: *DB 125, DB 400, DB 4041, DB 4100,* and *Lindy Marie*.[2] In addition to these, Advanced American also operates the following vessels that would be too tall to transit the proposed new bridge(s): *DB Millennium, MCR 8 Barge, Tug Schweiger*. The financial impact to Advance American from the elimination of these vessels from providing services upriver will be devastating—particularly to its towing vessels and derrick barge operations.

The elimination of Advanced American's services will place the community at risk. Advanced American averages about two responses per year upstream to government emergency calls, where a large derrick barge is needed. With the proposed new bridges in place, those calls will no longer be serviced. This problem will become particularly acute during periods of high water. The Draft SEIS appears to assume a water depth of only 16 feet. The report acknowledges, though, that "River height may significantly reduce the lift span clearance when seasonal river flows are above zero datum levels." *See e.g.* NIR, p 722 of 1132. Even so, the NIR conducts no analysis of and makes no contingency plans for high water. High waters are not inconceivable, particularly given recent experiences with climate change. During the February 1996 flood, there were tremendous emergency service demands, including a need for crane barges. If the proposed bridge(s) are built, those emergency service demands will go unmet.

There are 300 railroad bridges between Gunderson and Kennewick. Advanced American routinely transits railroad bridge sections upriver, under/through the bridge. Those sections routinely exceed 60 to 70 feet in height. When added to the vessel draft, this height, plus the required crane, render clearance under the proposed 116 foot and 121 foot bridges impossible and unsafe, respectively.

In addition to work that simply can no longer be done, Advanced American operates a number of vessels that will be required to modify their cranes or booms to pass under a lower bridge height. The Draft SEIS does not appropriately analyze the financial and operational impact of this requirement. As indicated in Advanced American's previous responses, removing a spud requires one half to a full day of work. *See* NIR p. 165 of 1132 pages. Then, the spud has to be reinserted after transiting the bridge. This process must be repeated on the way back to home port. In other words, each vessel will lose four (4) working days simply to remove and replace the spud for *each* vessel and *each* job assignment upriver! This is a tremendous amount of lost productivity, and that analysis does not even address the actual cost of the spud removal and replacement work.

The Draft SEIS discounts and does not make a reasonable attempt to quantify the costs this will impose on Advanced American. The Draft SEIS also does not identify *where* this work might be done, or the cost associated with securing a moorage to perform the work, or the cost associated with impending river passage if this work is performed mid-channel.

[2] While Advanced American still owns the *Paul Bunyan*, it is not currently using it for business operations.

Rather than address these issues, NIR section 2.18.2.2 outlines four elements for mitigation discussion and documentation the IBR proposes to have with impacted vessel owners. This is inadequate. NEPA requires actual data and actual impacts to be analyzed *before* the SEIS is finalized. Conducting those conversations later, after the Draft SEIS is published, prohibits any public review of or comment on the proposed mitigation options, in violation of NEPA. It also allows the IBR to make untenable proposals.

For example, as discussed above, mitigation options 1 and 2 do not adequately identify the costs, feasibility, or delays to be incurred by each vessel. Option 4 (reconfiguring the crane) will only work if the required reconfiguration is technically feasible and if the work to be performed on the other side of the bridge can be accommodated by a reconfigured boom/crane. If it cannot, the quadruple cost reconfigurations discussed above would be imposed on to the vessel operator.

Option 5, proposing to use a mobile crane rather than a vessel crane, defeats the entire business purpose for water-borne marine construction. This option basically proposes that water-based marine contractors should refer all of their business to land-based competitors to mitigate business losses from the IBR project. That its nonsensical. This option simply attempts to justify putting Advanced American and other marine contractors out of business.

These options would be unnecessary if the IBR simply attempted to avoid such harms by proposing a bridge that is tall enough, a bridge that contains a bridge lift, or other reasonable mitigation measures. For example, tug assists and timed bridge lifts routinely address conflicts between land-based transportation and marine commerce in other areas. Those concepts are not explored in the Draft SEIS. This is problematic, particularly because NEPA requires the IBR to consider *avoiding* the impacts before considering mitigation options.

Because the Draft SEIS does not provide an adequate analysis of the environmental, financial, and navigation impacts of and alternatives to the proposed new bridges, the Draft SEIS requires further work. My clients and I are available to discuss these issues and to collaboratively analyze ways the IBR might satisfactorily address my client's concerns, to minimize the damages from the IBR project. 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
139474\272302\MLCA\46818642.1

Schwabe

November 18, 2024

Maren L. Calvert
Admitted in Washington, Oregon, California and Hawaii
D: 360-597-0804
mcalvert@schwabe.com

VIA EMAIL: info@interstatebridge.org; ibr-row@interstatebridge.org; draftseis@interstatebridge.org.

Interstate Bridge Replacement Program,
Attn: Draft SEIS Public Comment
500 Broadway, Suite 200
Vancouver WA 98660

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These options would be unnecessary if the IBR simply attempted to avoid such harms by proposing a bridge that is tall enough, a bridge that contains a bridge lift, or other reasonable mitigation measures. For example, tug assists and timed bridge lifts routinely address conflicts between land-based transportation and marine commerce in other areas. Those concepts are not explored in the Draft SEIS. This is problematic, particularly because NEPA requires the IBR to consider *avoiding* the impacts before considering mitigation options.

Because the Draft SEIS does not provide an adequate analysis of the environmental, financial, and navigation impacts of and alternatives to the proposed new bridges, the Draft SEIS requires further work. My clients and I are available to discuss these issues and to collaboratively analyze ways the IBR might satisfactorily address my client's concerns, to minimize the damages from the IBR project. 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
139474\272302\MLCA\46818642.1

IBR Draft SEIS - RECORD #3440 DETAIL

First Name :	Michelle
Last Name :	Tworoger
Attachments :	DSEIS-3440_Tworoger_Original.pdf (6 kb)

IBR Draft SEIS - RECORD #3440 DETAIL

Submission Date : 11/18/2024
First Name : Michelle
Last Name : Tworoger
Business/Organization/Agency :

Submission Input :

This draft fails to address or mention the Hayden Island, Jantzen Beach Moorage and the Jantzen Beach community living/working on the island as well as property acquisitions. How will community be specifically impacted and how will the acquisition process be conducted? I own 2 homes on the island. How will people, land/property owners be financially compensated?

Thank you, [redacted] am anxious to meet with you folks addressing these issues.

IBR Draft SEIS - RECORD #3441 DETAIL

First Name :	Patrick
Last Name :	Gilligan
Attachments :	DSEIS-3441_Gilligan_Original.pdf (4 kb) image001.png (2 kb)

IBR Draft SEIS - RECORD #3441 DETAIL

Submission Date :	11/18/2024
First Name :	Patrick
Last Name :	Gilligan
Business/Organization/Agency :	Lincoln Property Company

Submission Input :

Dear Interstate Bridge Replacement Project Team:

Thank you for the opportunity to comment on the Interstate Bridge Replacement project ("IBR") Draft Supplemental Environmental Impact Statement ("Draft SEIS"). As a developer, Lincoln Property Company understands and appreciates the effort the IBR has put into planning the bridge project thus far. We look forward to future iterations of the plans, as more information is provided to the IBR, so that it may develop a safe, functional, and aesthetically pleasing new bridge in the future.

The following comments are intended to ensure the IBR is aware of changes on the ground, to Vancouver Waterfront properties that have recently occurred and continue to occur. We believe these changes will impact the Draft SEIS analysis, requiring additional work.

As currently drafted, the IBR project proposes to shift the I-5 freeway to the west in a manner that significantly encroaches upon land owned by the Port of Vancouver. That land is not vacant as it may appear in historical documents. Much of that land is fully developed or planned to be developed in the very near future.

For example, Figure 4-4 of the Land Use Technical Report identifies all or parts of parcels 986057459, 986049316, and 4884000 for a temporary construction easement. Lincoln Property Company recently completed development on Parcels 986057459 and 986049316, providing office space to the City of Vancouver's largest employer, ZoomInfo. Parcel 4884000 provides mandatory secondary fire access to those new buildings. Thus, these parcels are not "vacant lots" as assumed in the Land Use Report, and are not reasonably available for temporary construction easements.

In addition, the Land Use Report identifies several Port parcels along the waterfront, adjacent to the proposed new bridge location, for partial acquisition and temporary construction easements. As we understand it, those parcels (986049315, 986049327, 502250000, 502246000, and 502245000) are all fully entitled. The Port, Lincoln Property Company, and other developers have spent hundreds of millions of dollars creating a vision for the Vancouver Waterfront-a vision the Draft SEIS recognizes and applauds. That vision includes development plans for these waterfront parcels. At least one of these parcels has been developed into a city park. The others are under lease, development agreements, or other contractual arrangements so that they are likely to be developed before the IBR project begins. Accordingly, the Draft SEIS should be updated to recognize these changed circumstances and to select different parcels for construction easements.

In addition, the partial acquisition of the Port's waterfront parcel will interfere with the Waterfront's access to water-borne vessel traffic, devaluing the entire waterfront's value. A waterfront's value to the community is significantly lessened of the waterfront cannot provide access to the water. The Draft SEIS does not adequately address this concern-perhaps because the Draft SEIS assumed these waterfront parcels were all vacant, and planned to remain that way. If so, that assumption is no longer valid.

If the IBR's proposed uses of the Port's parcels identified in this comment interferes with, delays, or prohibits planned development of the parcels, then the environmental impact to the neighborhood and the economy of the Vancouver Waterfront will be much more severe than the Draft SEIS recognizes.

Lincoln Property welcomes and looks forward to the installation of a light-rail station on the waterfront. That said, Lincoln Property Company is very concerned the proposal to delete the I-5 north C-Street off-ramp and the State Route 14 (SR-14) on-ramp at Columbia Street in all proposed designs. This will cause significant traffic congestion and cause a significant portion of Vancouver Waterfront customers to travel all the way up to the I-5/Mill Plain interchange, only to travel back south on city surface streets to reach the Waterfront. This is unfortunate and undesirable.

The situation gets even worse with the Modified LPA "without C Street" option, in which ALL C-Street on-/off-ramps are removed so that ALL I-5 and SR-14 traffic will be routed through the I-5/Mill Plain interchange. I-5 southbound in this area 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 worsen the problem, increasing the demand volume at the I-5/Mill Plain interchange "between 30% and 50%." Section 4.3.3.3. The Draft SEIS acknowledges "redirected trips...would lead to much higher delays across several intersections, as well as queuing and blocking issues" and yet the plans do not propose adequate mitigation or improvements to address these concerns.

Lincoln Property Company urgently requests that the IBR reconsider the C-Street access proposals and asks the IBR to conduct its mitigation analyses now. The two proposed Modified LPA options would be devastating to traffic, businesses, and residents in the Vancouver Downtown and Waterfront areas.

We hope the IBR will agree the information above warrants additional work on the Draft SEIS, to ensure it accurately identifies and analyzes the environmental impacts of the proposed project. Lincoln Property Company is available to discuss and provide additional information to achieve that goal.

Thank you for the opportunity to comment.

[cid:image001.png@01DB39E0.EB0C9710]
Patrick Gilligan
Senior Executive Vice President - Pacific Northwest & Mountain West
C 415.420.2555
Lincoln Property Company
720 Third Avenue | Suite 1410 | Seattle, WA 98104 - NEW ADDRESS

lpc.com<https://www.lpc.com/>

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IBR Draft SEIS - RECORD #3447 DETAIL

First Name :	Zack
Last Name :	Luby
Attachments :	DSEIS-3447_Luby_Original_Redacted.pdf (3 kb)

IBR Draft SEIS - RECORD #3447 DETAIL

Submission Date : 11/18/2024
First Name : Zack
Last Name : Luby
Business/Organization/Agency :

Submission Input :

First Name:
Zack

Last Name:
Luby

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
I support the positions outlined by No More Freeways and the Just Crossing Alliance. I believe that freeway expansion is an atrocious way to spend public resources in the 21st century. Let's work together to get people OFF the roads wherever we can. Thank you.

JCA comment #: 852

IBR Draft SEIS - RECORD #3448 DETAIL

First Name :	Ben
Last Name :	Guernsey
Attachments :	DSEIS-3448_Guernsey_Original_Redacted.pdf (56 kb)

IBR Draft SEIS - RECORD #3448 DETAIL

Submission Date : 11/18/2024
First Name : Ben
Last Name : Guernsey
Business/Organization/Agency :

Submission Input :

First Name:
Ben

Last Name:
Guernsey

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
Active transportation must be a priority and not an afterthought and the 5-23-23 Draft Map fails to do this. Supporting active transit and public transit is necessary for this project to hit our region's environmental and equity goals. Mobility should be accessible without the high-entry cost of a personal vehicle. The current configuration of making active users cross under the bridge then a terribly awkward and wasteful spiral is not up to the needs of efficiency and safety. You can see a spiral solution like this goes underutilized at N Lombard

at I-5 where desire paths cut across dirt and to cross a freeway entrance to avoid the spiral ramp. Freeway designs need to take into account the human powered transit needs to be highly efficient.

The solution to I-5 needs to be to pair active transit multi-use on the same side as the Max transit. The new I-5 multi-use path needs to also be highly efficient both at the bridge crossings and to access from the Expo center and into Downtown Vancouver avoiding putting vulnerable roadway users near dangerous high speed arterials. The new configuration needs to minimize traffic crossings especially from traffic about to enter or exit a high-speed freeway.??In the single deck configuration the design should use the public transit space as a buffer from the freeway to avoid the very awful experience on the 205 multi-use path. The I-205 configuration is unacceptable and a near total failure. If the I-5 double deck configuration is to be used it should be both well-lit and dry. Every precaution to avoid run-off from the freeway above to not fall onto the users below should be taken.

Taking these steps will help better connect our two cities to foster more community and growth.

JCA comment #: 834

IBR Draft SEIS - RECORD #3449 DETAIL

First Name :	robert
Last Name :	butler
Attachments :	DSEIS-3449_Butler_Original.pdf (2 kb)

IBR Draft SEIS - RECORD #3449 DETAIL

Submission Date : 11/19/2024
First Name : robert
Last Name : butler
Business/Organization/Agency :

Submission Input :

1. In as much as the Federal grant for the project will not come close to building any of the alternatives, the make up of the alternatives must be individually economically justified to be included as new features. The light rail component is of special economic viable interest, passenger forecasts need to b updated to consider that ridership that last few years on Light rail in this subject region has dropped drastically. The majority of the light rail branches in the area have not reached their forecasted levels despite the drop over last few years. The same for pedestrian crossings. NW Flanders Bridge over I 405 west side Portland was $8.5 million with less than 1,000 crossings per Day, Same with Bluemenauer
pedestrian, bicycle cross on I-84 near Grand Ave. at $13.5 million is less than 1,000 1. crossings per day. Bicycle and pedestrian crossing there are about are about 2/3rds recreational and of no value to commerce. Two plus lanes of the preferred option are devoted to bicycle and pedestrian crossings . Two plus lanes are devoted to light rail.
That makes up lower decks of each of two main spans with the option of dropping one mode (light rail or other un motorized crossings or both modes) .
2. The traffic pinch point on the Oregon side of I-5 are not with in the crossing project's envelope. Pinch Points mainly are where I-5 is currently only two lanes from prox. the Fremont Bridge northerly, Congestion will not be reasonably improved by the Oregon Bridge traffic (N/S) and the crossing project could be postponed to a period of lower construction costs currently cycled to alle high.
3. Tolling create a public cost which defeats the advantages of reduced public costs by reduced congestion. The cost of installing tolling and impacts on pinch in flow need to be justified.
4. There is a carbon foot print so to speak in replacing structures decades before their economic life is over. Especially the newest crossing with many decades of functional use ahead. Replacing serviceable structures has an impact of the total 'green' impact of the project. There is no adequate analysis of the environmental impactite of demolition of useful structures
5. Lastly in the public cost of interruption of traffic for the reconstruction over many years. The alternatives must be quantified as to public costs due to delay or detouring crossings.

IBR Draft SEIS - RECORD #3450 DETAIL

First Name :	Colin
Last Name :	Rowan
Attachments :	Urban Flood Safety and Water Quality District.pdf (450 kb)

November 18, 2024

Interstate Bridge Replacement Program
Attn: Draft SEIS Public Comment
500 Broadway, Suite 200
Vancouver, WA 98660

Dear Interstate Bridge Replacement Program Team:

Thank you for your continued coordination with the staff of the Urban Flood Safety and Water Quality District. The Urban Flood Safety and Water Quality District (UFSWQD) operates the flood safety system along the Columbia River and Columbia Slough from North Portland to Troutdale. In addition to managing flood water through our internal conveyance system and pumps, we also manage 27-miles of federally authorized levees. Our system protects the jobs and livelihoods of nearly 60,000 employees and 8,000 residents.

In reviewing the Interstate Bridge Replacement Program (IBR Program) Draft SEIS, we appreciate your consideration of the levee system and the need to maintain its flood safety function. As noted in the document, we need adequate vertical clearances for operations, maintenance, and flood fighting. Additionally, we appreciate the note regarding consideration of bridge footings and other elements on the geotechnical performance of the levees and subsurface levee foundations. In any design advanced for the IBR Program, we must ensure that levee performance and operability is not reduced.

We have a handful of priorities that we must emphasize, recognizing they are largely considered in the Draft SEIS:

- While 408 permissions must be attained from the US Army Corps of Engineers to make alterations to a federal flood safety project, we request you consider designs that improve our access to the levees within your project area. We appreciate your continued coordination on the 408 permissions and overall design intersections with the levee system.
- Ensure all components of the flood safety system (e.g., primary levees and cross-levees) that are constructed or modified by the IBR Program are built to federal flood safety standards. This includes the remediation of the cross-levee that was damaged by the construction of the southbound I-5 / Marine Drive offramp in the 1990s.
- We appreciate your note about ensuring that the “IBR Program’s design efforts consider the timing and scope of the PMLS project and the FSCR proposed modifications”. We want to emphasize that important point. To the maximum

extent possible, please coordinate construction timing of levee and bridge projects to minimize the impact on surrounding communities.

- As the designs of many of our flood safety projects consider multi-benefit opportunities to enhance the natural environment, recreation, and non-motorized travel, we encourage the IBR Program to also look for opportunities to support broader community goals. Specifically, we encourage coordination with the development of the 40-Mile Loop trail system.

We look forward to our continued coordination and communication. Please do not hesitate to reach out to me or members of my team on any of the above topics or anything else related to our region's flood safety system.

Sincerely,

Jim Middaugh (Nov 18, 2024 20:49 PST)
Jim Middaugh
Executive Director
Urban Flood Safety and Water Quality District

UFSWQD - IBR Program Draft SEIS Letter - vF

Final Audit Report 2024-11-19

Created:	2024-11-19
By:	Colin Rowan (crowan@urbanfloodsafetyor.gov)
Status:	Signed
Transaction ID:	CBJCHBCAABAAbtFSjNA9T7_gLD3mfQRjiYj0wAMj320k

"UFSWQD - IBR Program Draft SEIS Letter - vF" History

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Signature Date: 2024-11-19 - 4:49:47 AM GMT - Time Source: server

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IBR Draft SEIS - RECORD #3451 DETAIL

First Name :	Sharon
Last Name :	Nasset
Attachments :	DSEIS-3451_Nasset_Original.pdf (8 mb) Citizen Comment DSEIS IBR Nov 18, 2024.odt (28 kb) (a) Bridge cond of I-5 freeway 2005.JPG (923 kb) (b) I-5 Partnership Final Recommendations at a glance .doc.pdf (190 kb) (c) daily averge map.pdf (8 mb) (d) Truman Hobbs Act 33 CFR Part 116 -- Alteration of Unreasonably Obstructive Bridges-2.pdf (92 kb)

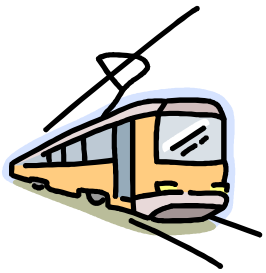
IBR Draft SEIS - RECORD #3451 DETAIL

Submission Date :	11/19/2024
First Name :	Sharon
Last Name :	Nasset
Business/Organization/Agency :	
Attachments :	(b) I-5 Partnership Final Recommendations at a glance .doc.pdf (190 kb) (c) daily averge map.pdf (8 mb) (d) Truman Hobbs Act 33 CFR Part 116 -- Alteration of Unreasonably Obstructive Bridges-2.pdf (92 kb) DEIS-3455_asset_original.pdf (222 kb)

Submission Input :

[----- Forwarded Message ----- From: Sharonnasset <sharonnasset@aol.com>To: sharonnasset <sharonnasset@aol.com>Sent: Monday, November 18, 2024 at 10:02:39 PM PSTSubject:

Final Recommendations at a Glance



Transit:

- Provide a phased light rail loop in Clark County in the vicinity of the I-5, SR500/4th Plain and I-205 Corridors.
- Provide peak-hour, premium express bus service in the I-5 and I-205 Corridors to markets not well served by light rail.
- Increase transit service in the Corridor over the next 20 years called for in regional transportation plans.



Interstate 5:

- The I-5 freeway between the Fremont Bridge in Portland and the I-205 interchange in Vancouver will be a maximum of 3 through lanes in each direction. This includes widening I-5 to 3 lanes between Delta Park and Lombard, and 99th St. to I-205 in Vancouver.
- Designate one of the 3 through lanes for use as a high occupancy vehicle (HOV) lane during the peak period, in the peak direction.
- Add a new supplemental or replacement bridge across the Columbia River with up to 2 auxiliary and/or arterial lanes in each direction, and 2 light rail tracks.
- Improve interchanges between SR 500 and Columbia Blvd to address safety and capacity problems -- including making Columbia Blvd into a full interchange.
- In adding river crossing capacity and making interchange improvements every effort should be made to: 1) avoid displacements and encroachments, 2) minimize the highway footprint and 3) minimize the use of the freeway for local trips.



Additional Rail Capacity:

- Pursue the rail infrastructure improvements required to accommodate anticipated 20 year freight rail growth in the I-5 Corridor and frequent, efficient intercity passenger rail service.
- Establish a public/private Bi-State rail forum to advise regional decision makers about prioritizing, scheduling and funding of needed rail improvements.
- The rail forum and regional decision-makers should encourage funding for:
  - Additional inter-city passenger rail service in the Pacific Northwest High Speed Rail Corridor
  - High Speed Rail service in the Corridor; and
  - The replacement of the existing "swing span" with a "lift span" located closer to the center of the river channel



Land Use:

- Adopt and implement a Bi-State Coordination Accord to protect existing and new capacity and support economic development.
- Jurisdictions in the Corridor will develop and agree on a plan to manage land development to avoid adversely impacting I-5 or the Region's growth management plans.



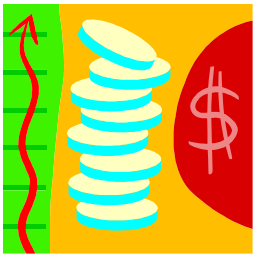
Transportation Demand and System Management:

- Commit to a comprehensive use of TDM/TSM strategies -- alternative modes, work-based strategies, policies and regulatory strategies, pricing and TSM strategies -- and pursue additional funding for transit and TDM/TSM strategies.
- Prepare an "I-5 TDM/TSM Corridor Plan" with guidance from the proposed "Bi-State Coordination Committee"
- Fund and implement additional TDM/TSM strategies now to encourage more efficient use of the transportation system.



Environmental Justice

- Establish a Community Enhancement Fund for use in the impacted areas in the I-5 Corridor in Oregon and Washington
- Map low-income and minority communities in the corridor.
- Take list of potential impacts identified by representatives of environmental justice communities into the EIS for the Bridge and Bridge Influence Area as a starting point for more analysis.
- Work with affected communities to explore ways to offset impacts and/or bring benefits to the community.
- Develop a public outreach plan for EIS process that includes special outreach to low-income and minority communities.
- Form and coordinate two working groups for the EIS -- one for public involvement and one for environmental justice.



Finance

- OR, WA and the Portland/Vancouver region should develop a financing plan for transit and highway capital projects
- Tri-Met and C-Tran need to increase revenues for a significant expansion of transit service, starting within the next five years.
- Establish regional transit financing commitments that will allow for:
  - an aggressive bi-state TDM program and
  - an expansion of transit service to support the light rail loop.
- Seek funding to widen I-5 to 3 lanes: Delta Park to Lombard after environmental and design work is completed.



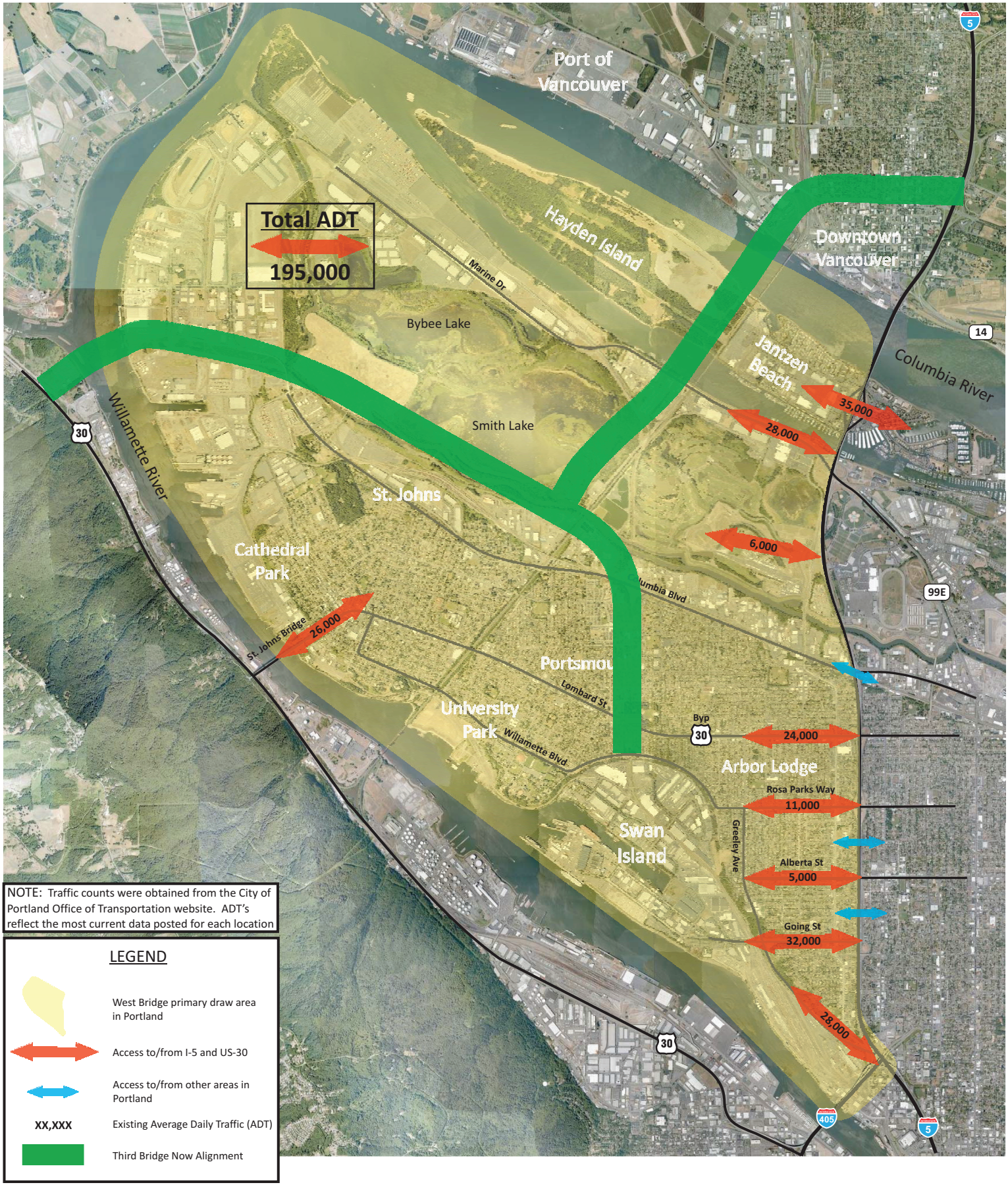
Next Steps/Implementation

- Fall 2002: SW Washington Regional Transportation Council and Metro review and amend the Regional Transportation Plans to incorporate recommended I-5 corridor improvements.

- Delta Park to Lombard: widen I-5 to 3 lanes
  - Summer 2002-2004: Conduct environmental assessment and design work
  - Post 2004: Construction of Delta Park to Lombard

- 2003 – 2009: Environmental Impact Study on Bridge Influence Area
  (new supplemental or replacement bridge, interchange improvements between SR 500 and Columbia Blvd., including light rail between Expo Center and downtown Vancouver)

- 2010+: Construct improvements in Bridge Influence Area.



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ENGINEERING AND PLANNING SERVICES

Figure 2
Existing Traffic Flows
Third Bridge Corridor Preliminary Benefit Analysis

This content is from the eCFR and is authoritative but unofficial.

Displaying title 33, up to date as of 5/24/2023. Title 33 was last amended 5/23/2023.

Title 33 —Navigation and Navigable Waters
Chapter I —Coast Guard, Department of Homeland Security
Subchapter J —Bridges

ENHANCED CONTENT - TABLE OF CONTENTS

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§ 116.35 Order to Alter.
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§ 116.45 Submission of bids, approval of award, guaranty of cost, and partial payments for bridges eligible for funding under the Truman-Hobbs Act.
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PART 116—ALTERATION OF UNREASONABLY OBSTRUCTIVE BRIDGES

Authority: 33 U.S.C. 401, 521.

Source: CGD 91–063, 60 FR 20902, Apr. 28, 1995, unless otherwise noted.

EDITORIAL NOTE

Editorial Note: Nomenclature changes to part 116 appear by USCG–2008–0179, 73 FR 35012, June 19, 2008 and USCG–2010–0351, 75 FR 49410, Aug. 13, 2010.

§ 116.01 General.

(a) All bridges are obstructions to navigation and are tolerated only as long as they serve the needs of land transportation while allowing for the reasonable needs of navigation.

(b) This part describes the general procedures by which the U.S. Coast Guard determines a bridge to be an unreasonable obstruction to navigation and issues an Order to Alter under the authority of

the following statutes, as appropriate: Section 18 of the Rivers and Harbors Appropriations Act of 1899, 33 U.S.C. 502; Section 4 of the Bridge Act of 1906, 33 U.S.C. 494; or the Truman-Hobbs Act of 1940, as amended, 33 U.S.C. 511–524.

(c) A bridge constructed across a navigable water of the United States shall not unreasonably obstruct the free navigation of the water over which it was constructed, either due to insufficient height or width of the navigation span, or because of difficulty in passing through the draw opening. If any bridge unreasonably obstructs navigation, the Commandant, U.S. Coast Guard, will order the alteration of that bridge. Alterations may include structural changes, replacement, or removal of the bridge.

(d) Whenever the Coast Guard has good reason to believe that a bridge across any of the navigable waters of the United States is an unreasonable obstruction to navigation, the Coast Guard will give notice to the owner of the bridge and other interested parties, and hold a public meeting at which the interested parties will have a full opportunity to be heard and to provide information on the question of whether alterations to the bridge are necessary and, if so, the extent of alterations needed.

(e) If the Coast Guard determines that alterations to a bridge are necessary, the Commandant, U.S. Coast Guard, will issue to the bridge owner an Order to Alter containing details of the alterations necessary to render navigation through or under the bridge reasonably free, easy, and unobstructed.

(1) In the case of a railroad or publicly owned highway bridge, an Order to Alter is issued to the bridge owner under the provisions of the Truman-Hobbs Act (33 U.S.C. 511 *et seq.*). In ordering these alterations, the Coast Guard will give due regard to the necessities of free and unobstructed navigation and of rail and highway traffic. For alterations to bridges governed by the Truman-Hobbs Act, the Coast Guard must approve general plans, specifications, and contracts for the alteration project, as well as approving the apportionment of the total cost of the alterations between the United States and the bridge owner.

(2) For all other bridges, the Order to Alter will contain the required alterations for the bridge and will prescribe a reasonable time in which to accomplish the required alterations. The bridge owner is responsible for the entire cost of the required alterations.

[CGD 91–063, 60 FR 20902, Apr. 28, 1995, as amended by USCG–2010–0351, 75 FR 49410, Aug. 13, 2010]

§ 116.05 Complaints.

Any person, company, or other entity may submit to the District Commander of the Coast Guard district in which a bridge over a navigable water of the United States is located, a complaint that a bridge unreasonably obstructs navigation. The complaint must be in writing and include specific details to support the allegation.

§ 116.10 Preliminary review.

(a) Upon receipt of a written complaint, the District Commander will review the complaint to determine if, in the District Commander's opinion, the complaint is justified and whether a Preliminary Investigation is warranted.

(1) The District Commander's opinion as to whether or not the complaint warrants a Preliminary Investigation will be formed through informal discussions with the complainant, users of the affected waterway, the owner of the bridge, and other interested

parties.

(2) In forming an opinion, the District Commander may also review the district files, records of accidents, and details of any additional written complaints associated with the bridge in question.

(b) In the absence of any written complaint, the District Commander may decide, based on a bridge's accident history or other criteria, to conduct a Preliminary Investigation.

(c) The District Commander will inform the complainant and the Chief, Office of Bridge Programs of the determination of any Preliminary Review. If the District Commander decides that the bridge in question is not an unreasonable obstruction to navigation, the complainant will be provided with a brief summary of the information on which the District Commander based the decision and will be informed of the appeal process described in § 116.55. There will be no further investigation, unless additional information warrants a continuance or reopening of the case.

[CGD 91–063, 60 FR 20902, Apr. 28, 1995, as amended by CGD 96–026, 61 FR 33663, June 28, 1996; USCG–2013–0397, 78 FR 39174, July 1, 2013]

§ 116.15 Preliminary investigation.

(a) During the Preliminary Investigation, the District Commander will prepare a written report containing all pertinent information and submit the report, together with a recommendation for or against the necessity of a Detailed Investigation, to the Chief, Office of Bridge Programs.

(b) The Preliminary Investigation Report will include a description of the nature and extent of the obstruction, the alterations to the bridge believed necessary to meet the reasonable needs of existing and future navigation, the type and volume of waterway traffic, and a calculation of the benefits to navigation which would result from the proposed bridge alterations.

(c) The Chief, Office of Bridge Programs will review the Preliminary Investigation Report and make a Preliminary Decision whether or not to undertake a Detailed Investigation and a Public Meeting.

(d) If after reviewing the Preliminary Investigation Report, the Chief, Office of Bridge Programs decides that further investigation is not warranted, the complainant will be notified of the decision. This notification will include a brief summary of information on which the decision was based and details of the appeal process described in § 116.55.

[CGD 91–063, 60 FR 20902, Apr. 28, 1995, as amended by CGD 96–026, 61 FR 33663, June 28, 1996; USCG–2012–0306, 77 FR 37314, June 21, 2012; USCG–2013–0397, 78 FR 39174, July 1, 2013; USCG–2014–0410, 79 FR 38433, July 7, 2014]

§ 116.20 Detailed investigation.

(a) When the Chief, Office of Bridge Programs determines that a Detailed Investigation should be conducted, the District Commander will initiate an investigation that addresses all of the pertinent data regarding the bridge, including information obtained at a public meeting held under § 116.25. As part of the investigation, the District Commander will develop a comprehensive report, termed the “Detailed Investigation Report”, which will discuss: the obstructive character of the bridge in question; the impact of that bridge upon navigation; navigational benefits derived; whether an alteration is needed to meet the needs of navigation; and, if alteration is recommended, what type.

(b) The District Commander will forward the completed Detailed Investigation Report to the Chief,

Office of Bridge Programs for review together with a recommendation of whether the bridge should be declared an unreasonable obstruction to navigation and, if so, whether an Order to Alter should be issued.

[CGD 91–063, 60 FR 20902, Apr. 28, 1995, as amended by CGD 96–026, 61 FR 33663, June 28, 1996; USCG–2013–0397, 78 FR 39174, July 1, 2013]

§ 116.25 Public meetings.

(a) Any time the Chief, Office of Bridge Programs determines that a Detailed Investigation is warranted, or when Congress declares a bridge unreasonably obstructive, the District Commander will hold a public meeting near the location of the bridge to provide the bridge owner, waterway users, and other interested parties the opportunity to offer evidence and be heard, orally or in writing, as to whether any alterations are necessary to provide reasonably free, safe, and unobstructed passage for waterborne traffic. The District Commander will issue a public notice announcing the public meeting stating the time, date, and place of the meeting.

(b) When a bridge is statutorily determined to be an unreasonable obstruction, the scope of the meeting will be to determine what navigation clearances are needed.

(c) In all other cases, the scope of the meeting will be to address issues bearing on the question of whether the bridge is an unreasonable obstruction to navigation and, if so, what alterations are needed.

(d) The meeting will be recorded. Copies of the public meeting transcript will be available for purchase from the recording service.

[CGD 91–063, 60 FR 20902, Apr. 28, 1995, as amended by CGD 96–026, 61 FR 33664, June 28, 1996; USCG–2013–0397, 78 FR 39174, July 1, 2013]

§ 116.30 Chief, Office of Bridge Programs Review and Evaluation.

(a) Upon receiving a Detailed Investigation Report from a District Commander, the Chief, Office of Bridge Programs will review all the information and make a final determination of whether or not the bridge is an unreasonable obstruction to navigation and, if so, whether to issue an Order to Alter. This determination will be accompanied by a supporting written Decision Analysis which will include a Benefit/Cost Analysis, including calculation of a Benefit/Cost Ratio.

(b) The Benefit/Cost ratio is calculated by dividing the annualized navigation benefit of the proposed bridge alteration by the annualized government share of the cost of the alteration.

(c) Except for a bridge which is statutorily determined to be an unreasonable obstruction, an Order to Alter will not be issued under the Truman-Hobbs Act unless the ratio is at least 1:1.

(d) If a bridge is statutorily determined to unreasonably obstruct navigation, the Chief, Office of Bridge Programs will prepare a Decision Analysis to document and provide details of the required vertical and horizontal clearances and the reasons alterations are necessary.

(e) If the Chief, Office of Bridge Programs decides to recommend that the Commandant issue an Order to Alter, or a bridge is statutorily determined to unreasonably obstruct navigation, the Chief, Office of Bridge Programs will issue a letter to the bridge owner (“The 60-Day Letter”) at least 60 days before the Commandant issues an Order to Alter. This letter will contain the reasons an alteration is necessary, the proposed alteration, and, in the case of a Truman-Hobbs bridge, an estimate of the total project cost and the bridge owner's share.

(f) If the bridge owner does not agree with the terms proposed in the 60-Day Letter, the owner may request a reevaluation of the terms. The request for a reevaluation must be in writing, and identify the terms for which reevaluation is requested. The request may provide additional information not previously presented.

(g) Upon receipt of the bridge owner's response, the Chief, Office of Bridge Programs will reevaluate the situation based on the additional information submitted by the bridge owner. If after the Chief, Office of Bridge Programs reviews the determination, there is no change, the Commandant may issue an Order to Alter as set out in § 116.35. The Administrator, Office of Bridge Programs determination based on the reevaluation will constitute final agency action.

[CGD 91–063, 60 FR 20902, Apr. 28, 1995, as amended by CGD 96–026, 61 FR 33664, June 28, 1996; USCG–2013–0397, 78 FR 39174, July 1, 2013]

§ 116.35 Order to Alter.

(a) If the bridge owner agrees with the contents of the 60-Day Letter, if no reply is received by 60 days after the issuance of the letter, or if after reevaluation a bridge is determined to be an unreasonable obstruction to navigation, the Commandant will issue an Order to Alter.

(1) If a bridge is eligible for funding under the Truman-Hobbs Act, the Order to Alter will specify the navigational clearances to be accomplished in order to meet the reasonable needs of navigation.

(2) An Order to Alter for a bridge that is not eligible for Truman-Hobbs funding will specify the navigational clearances that are required to meet the reasonable needs of navigation and will prescribe a reasonable time in which to accomplish them.

(b) If appropriate, the Order to Alter will be accompanied by a letter of special conditions setting forth safeguards needed to protect the environment or to provide for any special needs of navigation.

(c) If a proposed alteration to a bridge has desirable, non-navigational benefits, the Chief, Office of Bridge Programs may require an equitable contribution from any interested person, firm, association, corporation, municipality, county, or state benefiting from the alteration as a prerequisite to the making of an Order to Alter for that alteration.

(d) Failure to comply with any Order to Alter issued under the provisions of this part will subject the owner or controller of the bridge to the penalties prescribed in 33 U.S.C. 495, 502, 519, or any other applicable provision.

[CGD 91–063, 60 FR 20902, Apr. 28, 1995, as amended by CGD 96–026, 61 FR 33664, June 28, 1996; USCG–2013–0397, 78 FR 39174, July 1, 2013]

§ 116.40 Plans and specifications under the Truman-Hobbs Act.

(a) After an Order to Alter has been issued to a bridge owner under the Truman-Hobbs Act, the Chief, Office of Bridge Programs will issue a letter to the bridge owner outlining the owner's responsibilities to submit plans and specifications to the Chief, Office of Bridge Programs for the alteration of the bridge. The plans and specifications, at a minimum, must provide for the clearances identified in the Order to Alter. The plans and specifications may also include any other additional alteration to the bridge that the owner considers desirable to meet the requirements of railroad or highway traffic. During the alteration process, balanced consideration shall be given to the needs of rail, highway, and marine traffic.

(b) The Chief, Office of Bridge Programs will approve or reject the plans and specifications submitted by the bridge owner, in whole or in part, and may require the submission of new or additional plans and specifications.

(c) When Chief, Office of Bridge Programs has approved the submitted plans and specifications, they are final and binding upon all parties, unless later changes are approved by the Chief, Office of Bridge Programs. Any changes to the approved plans will be coordinated with the District Commander.

[CGD 91–063, 60 FR 20902, Apr. 28, 1995, as amended by CGD 96–026, 61 FR 33664, June 28, 1996; USCG–2013–0397, 78 FR 39174, July 1, 2013]

§ 116.45 Submission of bids, approval of award, guaranty of cost, and partial payments for bridges eligible for funding under the Truman-Hobbs Act.

(a) Once the plans and specifications for a bridge eligible for funding under the Truman-Hobbs Act have been approved, the bridge owner must take bids for the alteration of the bridge consistent with the approved plans and specifications. Those bids must then be submitted to the Chief, Office of Bridge Programs for approval.

(b) After the bridge owner submits the guaranty of cost required by 33 U.S.C. 515, the Chief, Office of Bridge Programs authorizes the owner to award the contract.

(c) Partial payments of the government's costs are authorized as the work progresses to the extent that funds have been appropriated.

[CGD 91–063, 60 FR 20902, Apr. 28, 1995, as amended by CGD 96–026, 61 FR 33664, June 28, 1996; USCG–2013–0397, 78 FR 39174, July 1, 2013; USCG–2014–0410, 79 FR 38433, July 7, 2014]

§ 116.50 Apportionment of costs under the Truman-Hobbs Act.

(a) In determining the apportionment of costs, the bridge owner must bear such part of the cost attributable to the direct and special benefits which will accrue to the bridge owner as a result of alteration to the bridge, including expected savings in repairs and maintenance, expected increased carrying capacity, costs attributable to the requirements of highway and railroad traffic, and actual capital costs of the used service life. The United States will bear the balance of the costs, including that part attributable to the necessities of navigation.

(b) “Direct and special benefits” ordinarily will include items desired by the owner but which have no counterpart or are of higher quality than similar items in the bridge prior to alteration. Examples include improved signal and fender systems, pro rata share of dismantling costs, and improvements included, but not required, in the interests of navigation.

(c) During the development of the Apportionment of Costs, the bridge owner will be provided with an opportunity to be heard. Proportionate shares of cost to be borne by the United States and the bridge owner are developed in substantially the following form:

> Total cost of project _____ $_____
> Less salvage ____ $____
> Less contribution by third party ____ $____
> Cost of alteration to be apportioned
> ____ $____
> Share to be borne by the bridge owner:

Direct and Special Benefits:
a. Removing old bridge ____ $____
b. Fixed charges ____ $____
c. Betterments ____ $____
Expected savings in repair or maintenance costs:
a. Repair ____ $____
b. Maintenance ____ $____
Costs attributable to requirements of railroad and/or highway traffic ____ $____
Expenditure for increased carrying capacity ____ $____
Expired service life of old bridge ____ $____
Subtotal ____ $____
Share to be borne by the bridge owner
____ $____
Contingencies ____ $____
Total ____ $____
Share to be borne by the United States
____ $____
Contingencies ____ $____
Total ____ $____

(d) The Order of Apportionment of Costs will include the guaranty of costs.

§ 116.55 Appeals.

(a) Except for the decision to issue an Order to Alter, if a complainant disagrees with a recommendation regarding obstruction or eligibility made by a District Commander, or the Chief, Office of Bridge Programs, the complainant may appeal that decision to the Deputy Commandant for Operations.

(b) The appeal must be submitted in writing to the Commandant (CG–DCO–D), Attn: Deputy for Operations Policy and Capabilities, U.S. Coast Guard Stop 7318, 2703 Martin Luther King Jr. Avenue SE., Washington, DC 20593–7318, within 60 days after the District Commander's or the Chief, Office of Bridge Programs decision. The Deputy Commandant for Operations will make a decision on the appeal within 90 days after receipt of the appeal. The Deputy Commandant of Operations' decision of this appeal shall constitute final agency action.

(c) Any Order of Apportionment made or issued under section 6 of the Truman-Hobbs Act, 33 U.S.C. 516, may be reviewed by the Court of Appeals for any judicial circuit in which the bridge in question is wholly or partly located, if a petition for review is filed within 90 days after the date of issuance of the order. The review is described in section 10 of the Truman-Hobbs Act, 33 U.S.C. 520. The review proceedings do not operate as a stay of any order issued under the Truman-Hobbs Act, other than an order of apportionment, nor relieve any bridge owner of any liability or penalty under other provisions of that act.

[CGD 91–063, 60 FR 20902, Apr. 28, 1995, as amended by CGD 96–026, 61 FR 33663, June 28, 1996; CGD 97–023, 62 FR 33363, June 19, 1997; USCG–2008–0179, 73 FR 35013, June 19, 2008; USCG–2010–0351, 75 FR 36283, June 25, 2010; USCG–2013–0397, 78 FR 39174, July 1, 2013; USCG–2014–0410, 79 FR 38433, July 7, 2014]

Interstate Bridge Replacement "Draft SEIS public comment"

Columbia River Crossings commonly known as the I-5 Bridges and several other adjacent properties have 4(f) Historical Resources with federal protection. If it is Feasible or Prudent it is required to avoid these properties.

It is both Feasible and Prudent to avoid the I-5 bridges and adjacent properties.

Feasible
It is Feasible to construct a new bridge adjacent to the BNSF rail bridge a location that has been recommend as a port to port connection for decades. The two deep water ports and transcontinental rail line are at the center of the project area.

Prudent
It is Prudent to avoid the I-5 bridges and the I-5 freeway.

Add capacity across the Columbia River
I-5 Portland / Vancouver Transportation and Trade Partnership in 2002 data showed we have fewer bridges than similar sized metropolitan and locally we have twelve bridges over the Willamette and only two across the Columbia River. Recommendations from the Environmental Impact Statement (EIS) stated to add capacity across The Columbia River with a supplemental or replacement bridge.

I-5 bridges have decades of life lift according to resent inspection
In 2005 the independent inspection of the Columbia River Crossings known as the I-5 bridges stated they are remarkable with 60 years of life left, no restrictions, meets all requirements, are worth a billion dollars and are protected as 4(f) Historical Resources for being an engineering marvel of it's time. Constructed in 1917 there are six bridges in Portland in use older and a dozen older that the1958 twin bridge. The bridges Level Of Service for an A rating is 88,000 vehicles daily, current users approximately 140,000 A bridge's dondition not ages is a reason to remove valuable infrastructure.

Keeping quality needed infrastructure the bridge has 60 years of life and adding a supplemental bridge across the Columbia River when you need capacity is Prudent.

The I-5 freeway south of the I-bridges is rated F for Level Of Service.
Level Of Service FHWA rating of the I-5 freeway south of the bridge is rated F for overcapacity causing approximately 30,000 vehicles daily into adjacent neighborhood streets. The freeway is overcapacity in both directions through North Portland from I-405 to the I-5 bridges causing hours of congestion seven days a week. The fact that the I-5 freeway and bridges are over capacity is not the fault of the bridges.

Oregon State Historic Preservation Office (SHPO) stated during the Columbia River Crossing that they did not study alternatives that left the bridges intact. CRC did not provide upgrades to mitigated issue the concerns with the current bridges..

The challenges identified with the current I -5 bridges can be mitigated

Addition of a promenade to historic bridges
Bicycle and Pedestrian Path on the I-5 bridge upgraded to a wide pedestrian promenade on the east

bridge between Portland and Vancouver connecting to the current bike pedestrian system.

Seismic

The I-5 Partnership EIS stated the bridges could be retro-fit and gave an approximately $50-million dollar estimate. In 2007 and 2010 and in 2021 requests to have a full independent seismic inspection with alternatives showing different levels of protections for 100, 500, and 1,000 years seismic events and the different cost. The information on seismic upgrades by a company specializing in retro-fitting have not been provided to the public.

Safety entering and exiting the I-5 bridges

The I-5 bridges still have their original 1917 and 1958 access alignments and can be relined inside the current Right Of Way to address issues of short lanes.

More bridges more options when an accident happens. Replacing one bridge with one bridge means one accident will still shut down the new bridge too. Two bridge locations one accident does not shut the entire system down.

Impaired freight movement due to lack of capacity

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 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. Adding an additional freeway bridge connecting to the I-5 freeway and crossing at the ports will provide congestion relief. The port alignment is one-mile west the I-205 is six miles when the majority of the traffic is heading west toward the terminals.

95% less lifts on the historic Columbia River Crossing bridges

The I-5 Partnership data showed that adding a second lift to the BNSF rail bridge would lessen the lifts on the I-5 bridges by 95% from approximately 400 to 30 lifts a year. A second lift in the BNSF rail bridges that is in-line with the I-5 barge channels would remove one of the US Coast Guard's top water hazards

In conclusion

The I-5 and the I-205 freeways are overcapacity and rated F for Level Of Service (LOS) by the FHWA several hours everyday. The I-5 and I-205 bridges are both over capacity and have no restrictions with several years of serviceable life left. A new port to port bridge freeway corridor bi-pass adjacent to the BNSF rail line has been in formerly Adopted Region Transportation Plans (RTP) since before 2000. We have been one of the top 10 congested cities in the nation almost every year for 20 years yet we are 26th in size and 60th in density. Previous studies have stated we need to add capacity not to remove sound bridges.

It is both Feasible and Prudent to realign the on/ off ramps, add a promenade for bike and pedestrian, lessen the lifts by 95% by removing water hazard, seismically retro-fit the bridges, less congestion and pollution for the community by an additional freeway in and out of the ports and industrial areas. Construct a third bridge and let the current I-5 bridges have the 60 years of life left that they deserve for being in such great shape.

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Attachments

(a) I-5 Bridge Condition
(b) I-5 Portland / Vancouver Transportation and Trade Partnership recommendations
(c) Daily Vehicle Count to Rivergate
(d) US Coast Guard Steven Fischer BNSF rail bridge
Metro President David Bragdon two letters address project concerns

Original Project Scope video
CRC presentation to Joint Oregon/Washington Transportation Commission "Original Project Scope" adding capacity across the Columbia River https://www.youtube.com/watch?v=CzQwLDHJo_M

Metro a CRC Signatory Agency, President and Project Sponsor Council member David Bragdon letter date May 5, 2021
http://www.nobridgetolls.com/nasset/docs/B%20%20%20%20%209%20%20David%20Bragdon%20May%205.pdf

Metro a CRC Signatory Agency, President and Project Sponsor Council member David Bragdon letter date May 19, 2010
http://www.nobridgetolls.com/nasset/docs/A%2010%20DavidBragdonCRCReviewMay19.pdf

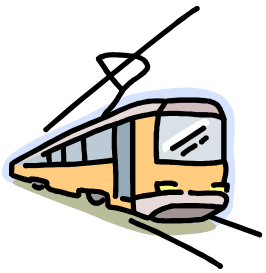
Port Commissioner Arch Miller and CRC remove alternatives against NEPA Policies
Watch CRC staff remove RC-14 a community supported third bridge alternative without any process. http://www.youtube.com/watch?v=jdnbvv6Rtgg This video is former Vancouver Port Commissioner Arch Miller telling the CRC Task Force advisory citizen committee to remove and not study the Third Bridge Corridor (RC-14) brought in during NEPA Scoping violate the NEPA EIS. The fact that an elected official would brazenly stand up and tell the official CRC Task Force and community that "HE" Thinks and What "HE" wants and what "HE" believes we MUST do as we are told! Totally scrapping having a fair and honest process or a comparable alternative.

Description Third Bridge Now
New freeway corridor is fully multi-modal alignment starting at I-5 and Mill Plain in Vancouver, crossing into Oregon and going south through Swan Island I-5, I-84, I-405, and west to HWY-30.
Freeway
Speed 55 MPH
Lift No
High capacity on/off ramps Yes
Freeway 6-lanes 2000 per hour per lane
Managed 2-lanes 2000 per hour per lane
Heavy rail 2-track unknown capacity
Third Bridge Now moving map link https://www.youtube.com/watch?v=nzaMpNR-Wj8&t=1006s

Thank you,
Sharon Nasset
[redacted]

Public comment for the DSEIS for IBP November18,2024
WWW>ThridBridgeNow.org

Final Recommendations at a Glance



Transit:

- Provide a phased light rail loop in Clark County in the vicinity of the I-5, SR500/4th Plain and I-205 Corridors.
- Provide peak-hour, premium express bus service in the I-5 and I-205 Corridors to markets not well served by light rail.
- Increase transit service in the Corridor over the next 20 years called for in regional transportation plans.



Interstate 5:

- The I-5 freeway between the Fremont Bridge in Portland and the I-205 interchange in Vancouver will be a maximum of 3 through lanes in each direction. This includes widening I-5 to 3 lanes between Delta Park and Lombard, and 99th St. to I-205 in Vancouver.
- Designate one of the 3 through lanes for use as a high occupancy vehicle (HOV) lane during the peak period, in the peak direction.
- Add a new supplemental or replacement bridge across the Columbia River with up to 2 auxiliary and/or arterial lanes in each direction, and 2 light rail tracks.
- Improve interchanges between SR 500 and Columbia Blvd to address safety and capacity problems -- including making Columbia Blvd into a full interchange.
- In adding river crossing capacity and making interchange improvements every effort should be made to: 1) avoid displacements and encroachments, 2) minimize the highway footprint and 3) minimize the use of the freeway for local trips.



Additional Rail Capacity:

- Pursue the rail infrastructure improvements required to accommodate anticipated 20 year freight rail growth in the I-5 Corridor and frequent, efficient intercity passenger rail service.
- Establish a public/private Bi-State rail forum to advise regional decision makers about prioritizing, scheduling and funding of needed rail improvements.
- The rail forum and regional decision-makers should encourage funding for:
  - Additional inter-city passenger rail service in the Pacific Northwest High Speed Rail Corridor
  - High Speed Rail service in the Corridor; and
  - The replacement of the existing "swing span" with a "lift span" located closer to the center of the river channel



Land Use:

- Adopt and implement a Bi-State Coordination Accord to protect existing and new capacity and support economic development.
- Jurisdictions in the Corridor will develop and agree on a plan to manage land development to avoid adversely impacting I-5 or the Region's growth management plans.



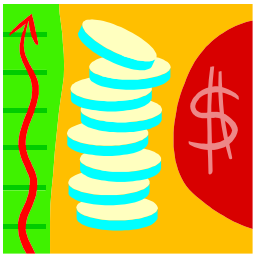
Transportation Demand and System Management:

- Commit to a comprehensive use of TDM/TSM strategies -- alternative modes, work-based strategies, policies and regulatory strategies, pricing and TSM strategies -- and pursue additional funding for transit and TDM/TSM strategies.
- Prepare an "I-5 TDM/TSM Corridor Plan" with guidance from the proposed "Bi-State Coordination Committee"
- Fund and implement additional TDM/TSM strategies now to encourage more efficient use of the transportation system.



Environmental Justice

- Establish a Community Enhancement Fund for use in the impacted areas in the I-5 Corridor in Oregon and Washington
- Map low-income and minority communities in the corridor.
- Take list of potential impacts identified by representatives of environmental justice communities into the EIS for the Bridge and Bridge Influence Area as a starting point for more analysis.
- Work with affected communities to explore ways to offset impacts and/or bring benefits to the community.
- Develop a public outreach plan for EIS process that includes special outreach to low-income and minority communities.
- Form and coordinate two working groups for the EIS -- one for public involvement and one for environmental justice.



Finance

- OR, WA and the Portland/Vancouver region should develop a financing plan for transit and highway capital projects
- Tri-Met and C-Tran need to increase revenues for a significant expansion of transit service, starting within the next five years.
- Establish regional transit financing commitments that will allow for:
  - an aggressive bi-state TDM program and
  - an expansion of transit service to support the light rail loop.
- Seek funding to widen I-5 to 3 lanes: Delta Park to Lombard after environmental and design work is completed.



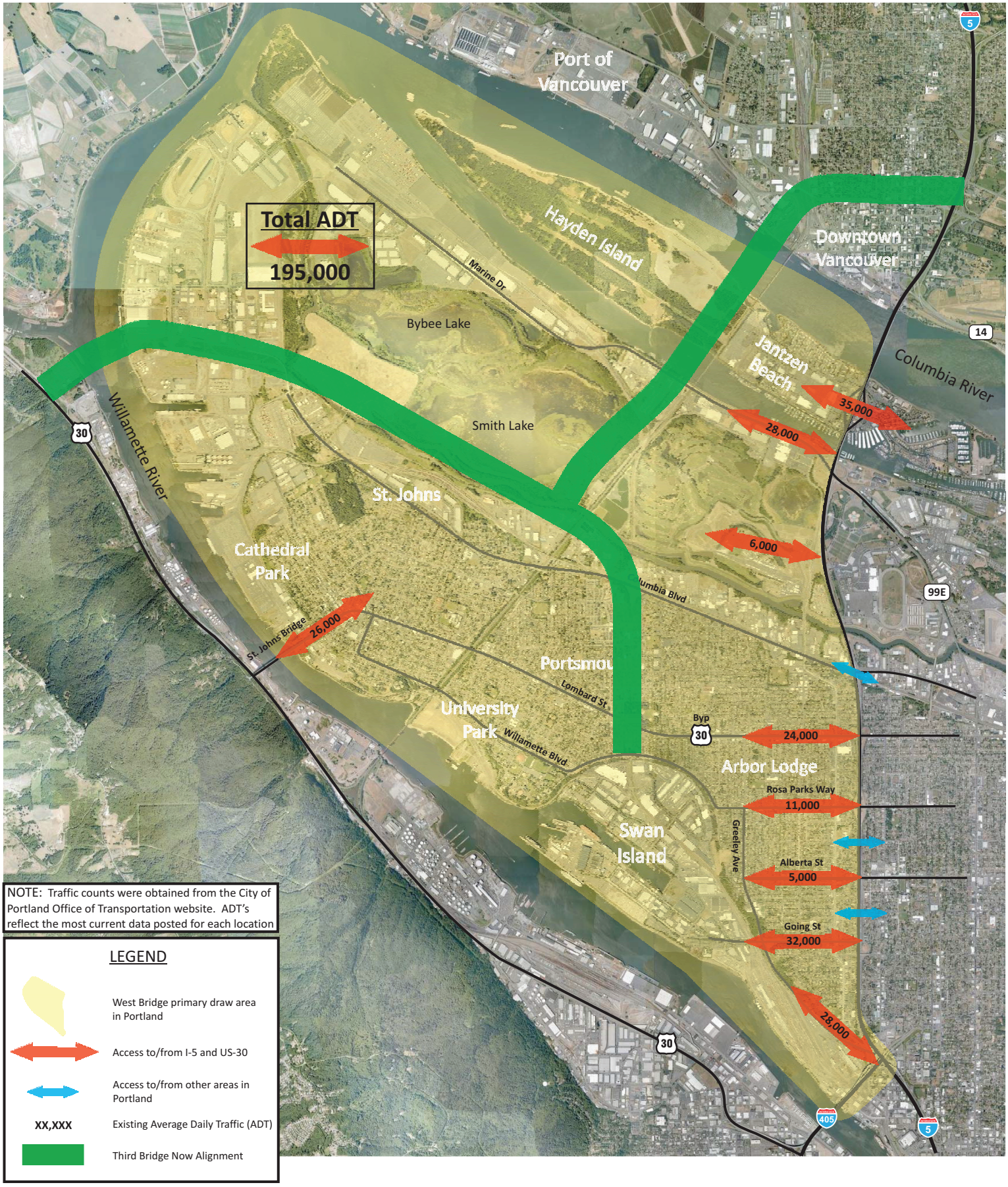
Next Steps/Implementation

- Fall 2002: SW Washington Regional Transportation Council and Metro review and amend the Regional Transportation Plans to incorporate recommended I-5 corridor improvements.

- Delta Park to Lombard: widen I-5 to 3 lanes
  - Summer 2002-2004: Conduct environmental assessment and design work
  - Post 2004: Construction of Delta Park to Lombard

- 2003 – 2009: Environmental Impact Study on Bridge Influence Area
  (new supplemental or replacement bridge, interchange improvements between SR 500 and Columbia Blvd., including light rail between Expo Center and downtown Vancouver)

- 2010+: Construct improvements in Bridge Influence Area.



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ENGINEERING AND PLANNING SERVICES

Figure 2
Existing Traffic Flows
Third Bridge Corridor Preliminary Benefit Analysis

This content is from the eCFR and is authoritative but unofficial.

Displaying title 33, up to date as of 5/24/2023. Title 33 was last amended 5/23/2023.

Title 33 —Navigation and Navigable Waters
Chapter I —Coast Guard, Department of Homeland Security
Subchapter J —Bridges

ENHANCED CONTENT - TABLE OF CONTENTS

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PART 116—ALTERATION OF UNREASONABLY OBSTRUCTIVE BRIDGES

Authority: 33 U.S.C. 401, 521.

Source: CGD 91–063, 60 FR 20902, Apr. 28, 1995, unless otherwise noted.

EDITORIAL NOTE

Editorial Note: Nomenclature changes to part 116 appear by USCG–2008–0179, 73 FR 35012, June 19, 2008 and USCG–2010–0351, 75 FR 49410, Aug. 13, 2010.

§ 116.01 General.

(a) All bridges are obstructions to navigation and are tolerated only as long as they serve the needs of land transportation while allowing for the reasonable needs of navigation.

(b) This part describes the general procedures by which the U.S. Coast Guard determines a bridge to be an unreasonable obstruction to navigation and issues an Order to Alter under the authority of

the following statutes, as appropriate: Section 18 of the Rivers and Harbors Appropriations Act of 1899, 33 U.S.C. 502; Section 4 of the Bridge Act of 1906, 33 U.S.C. 494; or the Truman-Hobbs Act of 1940, as amended, 33 U.S.C. 511–524.

(c) A bridge constructed across a navigable water of the United States shall not unreasonably obstruct the free navigation of the water over which it was constructed, either due to insufficient height or width of the navigation span, or because of difficulty in passing through the draw opening. If any bridge unreasonably obstructs navigation, the Commandant, U.S. Coast Guard, will order the alteration of that bridge. Alterations may include structural changes, replacement, or removal of the bridge.

(d) Whenever the Coast Guard has good reason to believe that a bridge across any of the navigable waters of the United States is an unreasonable obstruction to navigation, the Coast Guard will give notice to the owner of the bridge and other interested parties, and hold a public meeting at which the interested parties will have a full opportunity to be heard and to provide information on the question of whether alterations to the bridge are necessary and, if so, the extent of alterations needed.

(e) If the Coast Guard determines that alterations to a bridge are necessary, the Commandant, U.S. Coast Guard, will issue to the bridge owner an Order to Alter containing details of the alterations necessary to render navigation through or under the bridge reasonably free, easy, and unobstructed.

(1) In the case of a railroad or publicly owned highway bridge, an Order to Alter is issued to the bridge owner under the provisions of the Truman-Hobbs Act (33 U.S.C. 511 *et seq.*). In ordering these alterations, the Coast Guard will give due regard to the necessities of free and unobstructed navigation and of rail and highway traffic. For alterations to bridges governed by the Truman-Hobbs Act, the Coast Guard must approve general plans, specifications, and contracts for the alteration project, as well as approving the apportionment of the total cost of the alterations between the United States and the bridge owner.

(2) For all other bridges, the Order to Alter will contain the required alterations for the bridge and will prescribe a reasonable time in which to accomplish the required alterations. The bridge owner is responsible for the entire cost of the required alterations.

[CGD 91–063, 60 FR 20902, Apr. 28, 1995, as amended by USCG–2010–0351, 75 FR 49410, Aug. 13, 2010]

§ 116.05 Complaints.

Any person, company, or other entity may submit to the District Commander of the Coast Guard district in which a bridge over a navigable water of the United States is located, a complaint that a bridge unreasonably obstructs navigation. The complaint must be in writing and include specific details to support the allegation.

§ 116.10 Preliminary review.

(a) Upon receipt of a written complaint, the District Commander will review the complaint to determine if, in the District Commander's opinion, the complaint is justified and whether a Preliminary Investigation is warranted.

(1) The District Commander's opinion as to whether or not the complaint warrants a Preliminary Investigation will be formed through informal discussions with the complainant, users of the affected waterway, the owner of the bridge, and other interested

parties.

(2) In forming an opinion, the District Commander may also review the district files, records of accidents, and details of any additional written complaints associated with the bridge in question.

(b) In the absence of any written complaint, the District Commander may decide, based on a bridge's accident history or other criteria, to conduct a Preliminary Investigation.

(c) The District Commander will inform the complainant and the Chief, Office of Bridge Programs of the determination of any Preliminary Review. If the District Commander decides that the bridge in question is not an unreasonable obstruction to navigation, the complainant will be provided with a brief summary of the information on which the District Commander based the decision and will be informed of the appeal process described in § 116.55. There will be no further investigation, unless additional information warrants a continuance or reopening of the case.

[CGD 91–063, 60 FR 20902, Apr. 28, 1995, as amended by CGD 96–026, 61 FR 33663, June 28, 1996; USCG–2013–0397, 78 FR 39174, July 1, 2013]

§ 116.15 Preliminary investigation.

(a) During the Preliminary Investigation, the District Commander will prepare a written report containing all pertinent information and submit the report, together with a recommendation for or against the necessity of a Detailed Investigation, to the Chief, Office of Bridge Programs.

(b) The Preliminary Investigation Report will include a description of the nature and extent of the obstruction, the alterations to the bridge believed necessary to meet the reasonable needs of existing and future navigation, the type and volume of waterway traffic, and a calculation of the benefits to navigation which would result from the proposed bridge alterations.

(c) The Chief, Office of Bridge Programs will review the Preliminary Investigation Report and make a Preliminary Decision whether or not to undertake a Detailed Investigation and a Public Meeting.

(d) If after reviewing the Preliminary Investigation Report, the Chief, Office of Bridge Programs decides that further investigation is not warranted, the complainant will be notified of the decision. This notification will include a brief summary of information on which the decision was based and details of the appeal process described in § 116.55.

[CGD 91–063, 60 FR 20902, Apr. 28, 1995, as amended by CGD 96–026, 61 FR 33663, June 28, 1996; USCG–2012–0306, 77 FR 37314, June 21, 2012; USCG–2013–0397, 78 FR 39174, July 1, 2013; USCG–2014–0410, 79 FR 38433, July 7, 2014]

§ 116.20 Detailed investigation.

(a) When the Chief, Office of Bridge Programs determines that a Detailed Investigation should be conducted, the District Commander will initiate an investigation that addresses all of the pertinent data regarding the bridge, including information obtained at a public meeting held under § 116.25. As part of the investigation, the District Commander will develop a comprehensive report, termed the “Detailed Investigation Report”, which will discuss: the obstructive character of the bridge in question; the impact of that bridge upon navigation; navigational benefits derived; whether an alteration is needed to meet the needs of navigation; and, if alteration is recommended, what type.

(b) The District Commander will forward the completed Detailed Investigation Report to the Chief,

Office of Bridge Programs for review together with a recommendation of whether the bridge should be declared an unreasonable obstruction to navigation and, if so, whether an Order to Alter should be issued.

[CGD 91–063, 60 FR 20902, Apr. 28, 1995, as amended by CGD 96–026, 61 FR 33663, June 28, 1996; USCG–2013–0397, 78 FR 39174, July 1, 2013]

§ 116.25 Public meetings.

(a) Any time the Chief, Office of Bridge Programs determines that a Detailed Investigation is warranted, or when Congress declares a bridge unreasonably obstructive, the District Commander will hold a public meeting near the location of the bridge to provide the bridge owner, waterway users, and other interested parties the opportunity to offer evidence and be heard, orally or in writing, as to whether any alterations are necessary to provide reasonably free, safe, and unobstructed passage for waterborne traffic. The District Commander will issue a public notice announcing the public meeting stating the time, date, and place of the meeting.

(b) When a bridge is statutorily determined to be an unreasonable obstruction, the scope of the meeting will be to determine what navigation clearances are needed.

(c) In all other cases, the scope of the meeting will be to address issues bearing on the question of whether the bridge is an unreasonable obstruction to navigation and, if so, what alterations are needed.

(d) The meeting will be recorded. Copies of the public meeting transcript will be available for purchase from the recording service.

[CGD 91–063, 60 FR 20902, Apr. 28, 1995, as amended by CGD 96–026, 61 FR 33664, June 28, 1996; USCG–2013–0397, 78 FR 39174, July 1, 2013]

§ 116.30 Chief, Office of Bridge Programs Review and Evaluation.

(a) Upon receiving a Detailed Investigation Report from a District Commander, the Chief, Office of Bridge Programs will review all the information and make a final determination of whether or not the bridge is an unreasonable obstruction to navigation and, if so, whether to issue an Order to Alter. This determination will be accompanied by a supporting written Decision Analysis which will include a Benefit/Cost Analysis, including calculation of a Benefit/Cost Ratio.

(b) The Benefit/Cost ratio is calculated by dividing the annualized navigation benefit of the proposed bridge alteration by the annualized government share of the cost of the alteration.

(c) Except for a bridge which is statutorily determined to be an unreasonable obstruction, an Order to Alter will not be issued under the Truman-Hobbs Act unless the ratio is at least 1:1.

(d) If a bridge is statutorily determined to unreasonably obstruct navigation, the Chief, Office of Bridge Programs will prepare a Decision Analysis to document and provide details of the required vertical and horizontal clearances and the reasons alterations are necessary.

(e) If the Chief, Office of Bridge Programs decides to recommend that the Commandant issue an Order to Alter, or a bridge is statutorily determined to unreasonably obstruct navigation, the Chief, Office of Bridge Programs will issue a letter to the bridge owner (“The 60-Day Letter”) at least 60 days before the Commandant issues an Order to Alter. This letter will contain the reasons an alteration is necessary, the proposed alteration, and, in the case of a Truman-Hobbs bridge, an estimate of the total project cost and the bridge owner's share.

(f) If the bridge owner does not agree with the terms proposed in the 60-Day Letter, the owner may request a reevaluation of the terms. The request for a reevaluation must be in writing, and identify the terms for which reevaluation is requested. The request may provide additional information not previously presented.

(g) Upon receipt of the bridge owner's response, the Chief, Office of Bridge Programs will reevaluate the situation based on the additional information submitted by the bridge owner. If after the Chief, Office of Bridge Programs reviews the determination, there is no change, the Commandant may issue an Order to Alter as set out in § 116.35. The Administrator, Office of Bridge Programs determination based on the reevaluation will constitute final agency action.

[CGD 91–063, 60 FR 20902, Apr. 28, 1995, as amended by CGD 96–026, 61 FR 33664, June 28, 1996; USCG–2013–0397, 78 FR 39174, July 1, 2013]

§ 116.35 Order to Alter.

(a) If the bridge owner agrees with the contents of the 60-Day Letter, if no reply is received by 60 days after the issuance of the letter, or if after reevaluation a bridge is determined to be an unreasonable obstruction to navigation, the Commandant will issue an Order to Alter.

(1) If a bridge is eligible for funding under the Truman-Hobbs Act, the Order to Alter will specify the navigational clearances to be accomplished in order to meet the reasonable needs of navigation.

(2) An Order to Alter for a bridge that is not eligible for Truman-Hobbs funding will specify the navigational clearances that are required to meet the reasonable needs of navigation and will prescribe a reasonable time in which to accomplish them.

(b) If appropriate, the Order to Alter will be accompanied by a letter of special conditions setting forth safeguards needed to protect the environment or to provide for any special needs of navigation.

(c) If a proposed alteration to a bridge has desirable, non-navigational benefits, the Chief, Office of Bridge Programs may require an equitable contribution from any interested person, firm, association, corporation, municipality, county, or state benefiting from the alteration as a prerequisite to the making of an Order to Alter for that alteration.

(d) Failure to comply with any Order to Alter issued under the provisions of this part will subject the owner or controller of the bridge to the penalties prescribed in 33 U.S.C. 495, 502, 519, or any other applicable provision.

[CGD 91–063, 60 FR 20902, Apr. 28, 1995, as amended by CGD 96–026, 61 FR 33664, June 28, 1996; USCG–2013–0397, 78 FR 39174, July 1, 2013]

§ 116.40 Plans and specifications under the Truman-Hobbs Act.

(a) After an Order to Alter has been issued to a bridge owner under the Truman-Hobbs Act, the Chief, Office of Bridge Programs will issue a letter to the bridge owner outlining the owner's responsibilities to submit plans and specifications to the Chief, Office of Bridge Programs for the alteration of the bridge. The plans and specifications, at a minimum, must provide for the clearances identified in the Order to Alter. The plans and specifications may also include any other additional alteration to the bridge that the owner considers desirable to meet the requirements of railroad or highway traffic. During the alteration process, balanced consideration shall be given to the needs of rail, highway, and marine traffic.

(b) The Chief, Office of Bridge Programs will approve or reject the plans and specifications submitted by the bridge owner, in whole or in part, and may require the submission of new or additional plans and specifications.

(c) When Chief, Office of Bridge Programs has approved the submitted plans and specifications, they are final and binding upon all parties, unless later changes are approved by the Chief, Office of Bridge Programs. Any changes to the approved plans will be coordinated with the District Commander.

[CGD 91–063, 60 FR 20902, Apr. 28, 1995, as amended by CGD 96–026, 61 FR 33664, June 28, 1996; USCG–2013–0397, 78 FR 39174, July 1, 2013]

§ 116.45 Submission of bids, approval of award, guaranty of cost, and partial payments for bridges eligible for funding under the Truman-Hobbs Act.

(a) Once the plans and specifications for a bridge eligible for funding under the Truman-Hobbs Act have been approved, the bridge owner must take bids for the alteration of the bridge consistent with the approved plans and specifications. Those bids must then be submitted to the Chief, Office of Bridge Programs for approval.

(b) After the bridge owner submits the guaranty of cost required by 33 U.S.C. 515, the Chief, Office of Bridge Programs authorizes the owner to award the contract.

(c) Partial payments of the government's costs are authorized as the work progresses to the extent that funds have been appropriated.

[CGD 91–063, 60 FR 20902, Apr. 28, 1995, as amended by CGD 96–026, 61 FR 33664, June 28, 1996; USCG–2013–0397, 78 FR 39174, July 1, 2013; USCG–2014–0410, 79 FR 38433, July 7, 2014]

§ 116.50 Apportionment of costs under the Truman-Hobbs Act.

(a) In determining the apportionment of costs, the bridge owner must bear such part of the cost attributable to the direct and special benefits which will accrue to the bridge owner as a result of alteration to the bridge, including expected savings in repairs and maintenance, expected increased carrying capacity, costs attributable to the requirements of highway and railroad traffic, and actual capital costs of the used service life. The United States will bear the balance of the costs, including that part attributable to the necessities of navigation.

(b) “Direct and special benefits” ordinarily will include items desired by the owner but which have no counterpart or are of higher quality than similar items in the bridge prior to alteration. Examples include improved signal and fender systems, pro rata share of dismantling costs, and improvements included, but not required, in the interests of navigation.

(c) During the development of the Apportionment of Costs, the bridge owner will be provided with an opportunity to be heard. Proportionate shares of cost to be borne by the United States and the bridge owner are developed in substantially the following form:

> Total cost of project _____ $_____
> Less salvage ____ $____
> Less contribution by third party ____ $____
> Cost of alteration to be apportioned
> ____ $____
> Share to be borne by the bridge owner:

Direct and Special Benefits:
a. Removing old bridge ____ $____
b. Fixed charges ____ $____
c. Betterments ____ $____
Expected savings in repair or maintenance costs:
a. Repair ____ $____
b. Maintenance ____ $____
Costs attributable to requirements of railroad and/or highway traffic ____ $____
Expenditure for increased carrying capacity ____ $____
Expired service life of old bridge ____ $____
Subtotal ____ $____
Share to be borne by the bridge owner
____ $____
Contingencies ____ $____
Total ____ $____
Share to be borne by the United States
____ $____
Contingencies ____ $____
Total ____ $____

(d) The Order of Apportionment of Costs will include the guaranty of costs.

§ 116.55 Appeals.

(a) Except for the decision to issue an Order to Alter, if a complainant disagrees with a recommendation regarding obstruction or eligibility made by a District Commander, or the Chief, Office of Bridge Programs, the complainant may appeal that decision to the Deputy Commandant for Operations.

(b) The appeal must be submitted in writing to the Commandant (CG–DCO–D), Attn: Deputy for Operations Policy and Capabilities, U.S. Coast Guard Stop 7318, 2703 Martin Luther King Jr. Avenue SE., Washington, DC 20593–7318, within 60 days after the District Commander's or the Chief, Office of Bridge Programs decision. The Deputy Commandant for Operations will make a decision on the appeal within 90 days after receipt of the appeal. The Deputy Commandant of Operations' decision of this appeal shall constitute final agency action.

(c) Any Order of Apportionment made or issued under section 6 of the Truman-Hobbs Act, 33 U.S.C. 516, may be reviewed by the Court of Appeals for any judicial circuit in which the bridge in question is wholly or partly located, if a petition for review is filed within 90 days after the date of issuance of the order. The review is described in section 10 of the Truman-Hobbs Act, 33 U.S.C. 520. The review proceedings do not operate as a stay of any order issued under the Truman-Hobbs Act, other than an order of apportionment, nor relieve any bridge owner of any liability or penalty under other provisions of that act.

[CGD 91–063, 60 FR 20902, Apr. 28, 1995, as amended by CGD 96–026, 61 FR 33663, June 28, 1996; CGD 97–023, 62 FR 33363, June 19, 1997; USCG–2008–0179, 73 FR 35013, June 19, 2008; USCG–2010–0351, 75 FR 36283, June 25, 2010; USCG–2013–0397, 78 FR 39174, July 1, 2013; USCG–2014–0410, 79 FR 38433, July 7, 2014]

IBR Draft SEIS - RECORD #3452 DETAIL

First Name :	Kevin
Last Name :	Chambers
Attachments :	DSEIS-3452_chambers_original.pdf (4 kb)

IBR Draft SEIS - RECORD #3452 DETAIL

Submission Date : 11/18/2024
First Name : Kevin
Last Name : Chambers
Business/Organization/Agency :

Submission Input :

First Name:
Kevin

Last Name:
Chambers

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
While I wholeheartedly support the replacement of the aging I5 bridges, I disagree with expanding the scope of the project to include interchanges and other highway segments that do not immediately abutt the bridge.

IBR Draft SEIS - RECORD #3454 DETAIL

First Name :	Joseph
Last Name :	Van Kleeck
Attachments :	DSEIS-3454_vankleeck_original.pdf (4 kb)

IBR Draft SEIS - RECORD #3454 DETAIL

Submission Date : 11/18/2024
First Name : Joseph
Last Name : Van Kleeck
Business/Organization/Agency :

Submission Input :

First Name:
Joseph

Last Name:
Van Kleeck

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Induced Demand

Comment:
Build with an emphasis on public transit and pedestrian access, not "One More Lane". We will never meet ODOT's goal of reducing emissions and vehicle-miles wasting billions of dollars on a lane expansion, dismantling housing and businesses in the process and ultimately doing NOTHING to quell the flow of traffic. If this gets built it will be in vain in a decade, as induced demand has shown time and time again these roads will clog up and bottleneck. Stop the waste. Stop the insanity. Invest in PEOPLE, NOT CARS.

IBR Draft SEIS - RECORD #3455 DETAIL

First Name :	Sharon
Last Name :	Nasset
Attachments :	DSEIS-3455_Nasset_Original.pdf (8 mb) Citizen Comment DSEIS IBR Nov 18, 2024.odt (28 kb) (a) Bridge cond of I-5 freeway 2005.JPG (923 kb) (b) I-5 Partnership Final Recommendations at a glance .doc.pdf (190 kb) (c) daily averge map.pdf (8 mb) (d) Truman Hobbs Act 33 CFR Part 116 -- Alteration of Unreasonably Obstructive Bridges-2.pdf (92 kb)

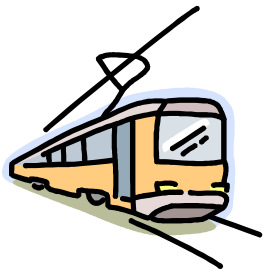
IBR Draft SEIS - RECORD #3455 DETAIL

Submission Date :	11/19/2024
First Name :	Sharon
Last Name :	Nasset
Business/Organization/Agency :	
Attachments :	(b) I-5 Partnership Final Recommendations at a glance .doc.pdf (190 kb) (c) daily averge map.pdf (8 mb) (d) Truman Hobbs Act 33 CFR Part 116 -- Alteration of Unreasonably Obstructive Bridges-2.pdf (92 kb) DEIS-3455_asset_original.pdf (222 kb)

Submission Input :

[----- Forwarded Message ----- From: Sharonnasset <sharonnasset@aol.com>To: sharonnasset <sharonnasset@aol.com>Sent: Monday, November 18, 2024 at 10:02:39 PM PSTSubject:

Final Recommendations at a Glance



Transit:

- Provide a phased light rail loop in Clark County in the vicinity of the I-5, SR500/4th Plain and I-205 Corridors.
- Provide peak-hour, premium express bus service in the I-5 and I-205 Corridors to markets not well served by light rail.
- Increase transit service in the Corridor over the next 20 years called for in regional transportation plans.



Interstate 5:

- The I-5 freeway between the Fremont Bridge in Portland and the I-205 interchange in Vancouver will be a maximum of 3 through lanes in each direction. This includes widening I-5 to 3 lanes between Delta Park and Lombard, and 99th St. to I-205 in Vancouver.
- Designate one of the 3 through lanes for use as a high occupancy vehicle (HOV) lane during the peak period, in the peak direction.
- Add a new supplemental or replacement bridge across the Columbia River with up to 2 auxiliary and/or arterial lanes in each direction, and 2 light rail tracks.
- Improve interchanges between SR 500 and Columbia Blvd to address safety and capacity problems -- including making Columbia Blvd into a full interchange.
- In adding river crossing capacity and making interchange improvements every effort should be made to: 1) avoid displacements and encroachments, 2) minimize the highway footprint and 3) minimize the use of the freeway for local trips.



Additional Rail Capacity:

- Pursue the rail infrastructure improvements required to accommodate anticipated 20 year freight rail growth in the I-5 Corridor and frequent, efficient intercity passenger rail service.
- Establish a public/private Bi-State rail forum to advise regional decision makers about prioritizing, scheduling and funding of needed rail improvements.
- The rail forum and regional decision-makers should encourage funding for:
  - Additional inter-city passenger rail service in the Pacific Northwest High Speed Rail Corridor
  - High Speed Rail service in the Corridor; and
  - The replacement of the existing "swing span" with a "lift span" located closer to the center of the river channel



Land Use:

- Adopt and implement a Bi-State Coordination Accord to protect existing and new capacity and support economic development.
- Jurisdictions in the Corridor will develop and agree on a plan to manage land development to avoid adversely impacting I-5 or the Region's growth management plans.



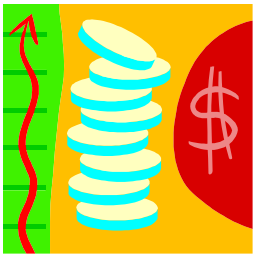
Transportation Demand and System Management:

- Commit to a comprehensive use of TDM/TSM strategies -- alternative modes, work-based strategies, policies and regulatory strategies, pricing and TSM strategies -- and pursue additional funding for transit and TDM/TSM strategies.
- Prepare an "I-5 TDM/TSM Corridor Plan" with guidance from the proposed "Bi-State Coordination Committee"
- Fund and implement additional TDM/TSM strategies now to encourage more efficient use of the transportation system.



Environmental Justice

- Establish a Community Enhancement Fund for use in the impacted areas in the I-5 Corridor in Oregon and Washington
- Map low-income and minority communities in the corridor.
- Take list of potential impacts identified by representatives of environmental justice communities into the EIS for the Bridge and Bridge Influence Area as a starting point for more analysis.
- Work with affected communities to explore ways to offset impacts and/or bring benefits to the community.
- Develop a public outreach plan for EIS process that includes special outreach to low-income and minority communities.
- Form and coordinate two working groups for the EIS -- one for public involvement and one for environmental justice.



Finance

- OR, WA and the Portland/Vancouver region should develop a financing plan for transit and highway capital projects
- Tri-Met and C-Tran need to increase revenues for a significant expansion of transit service, starting within the next five years.
- Establish regional transit financing commitments that will allow for:
  - an aggressive bi-state TDM program and
  - an expansion of transit service to support the light rail loop.
- Seek funding to widen I-5 to 3 lanes: Delta Park to Lombard after environmental and design work is completed.



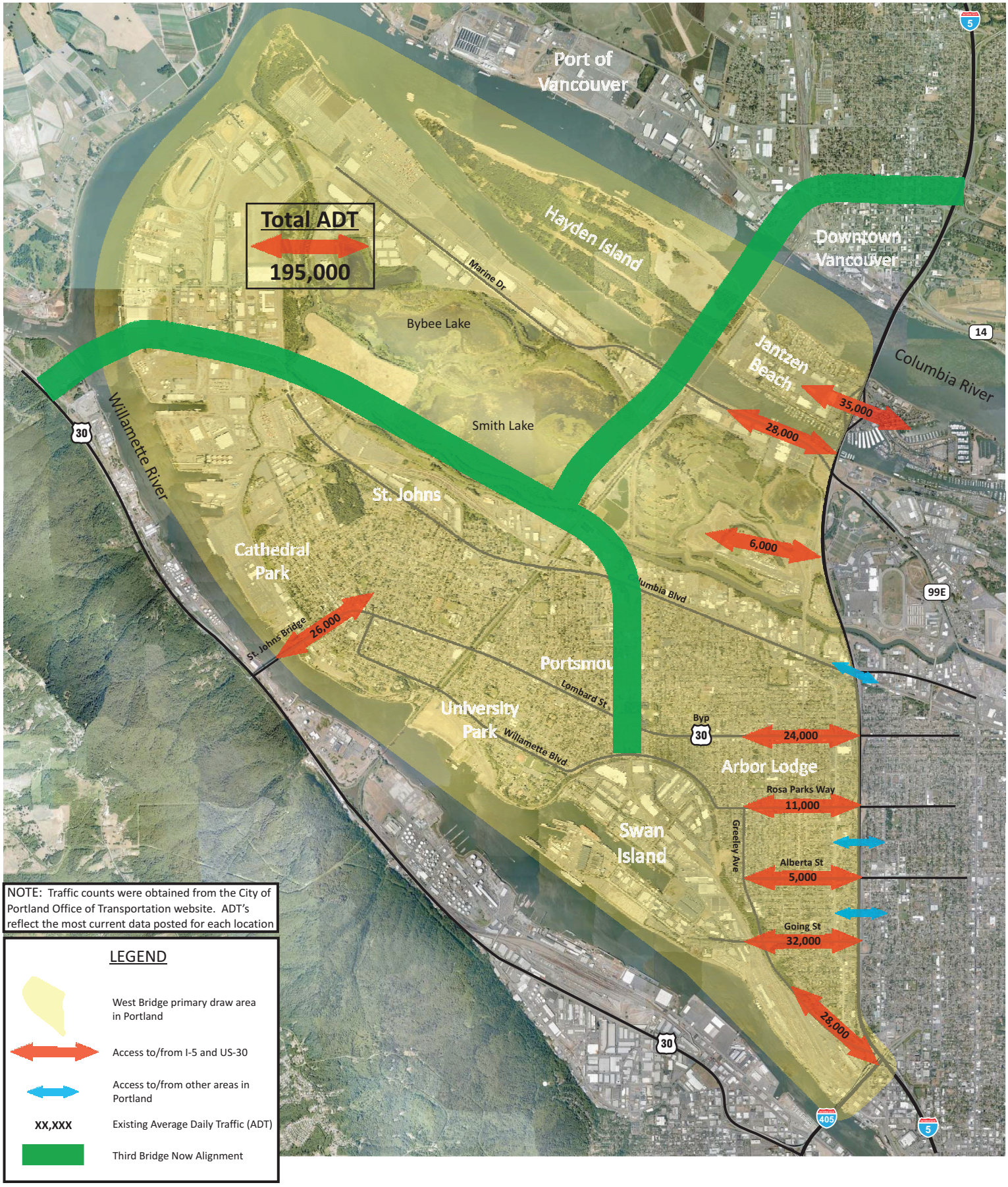
Next Steps/Implementation

- Fall 2002: SW Washington Regional Transportation Council and Metro review and amend the Regional Transportation Plans to incorporate recommended I-5 corridor improvements.

- Delta Park to Lombard: widen I-5 to 3 lanes
  - Summer 2002-2004: Conduct environmental assessment and design work
  - Post 2004: Construction of Delta Park to Lombard

- 2003 – 2009: Environmental Impact Study on Bridge Influence Area
  (new supplemental or replacement bridge, interchange improvements between SR 500 and Columbia Blvd., including light rail between Expo Center and downtown Vancouver)

- 2010+: Construct improvements in Bridge Influence Area.



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ENGINEERING AND PLANNING SERVICES

Figure 2
Existing Traffic Flows
Third Bridge Corridor Preliminary Benefit Analysis

This content is from the eCFR and is authoritative but unofficial.

Displaying title 33, up to date as of 5/24/2023. Title 33 was last amended 5/23/2023.

Title 33 —Navigation and Navigable Waters
Chapter I —Coast Guard, Department of Homeland Security
Subchapter J —Bridges

ENHANCED CONTENT - TABLE OF CONTENTS

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PART 116—ALTERATION OF UNREASONABLY OBSTRUCTIVE BRIDGES

Authority: 33 U.S.C. 401, 521.

Source: CGD 91–063, 60 FR 20902, Apr. 28, 1995, unless otherwise noted.

EDITORIAL NOTE

Editorial Note: Nomenclature changes to part 116 appear by USCG–2008–0179, 73 FR 35012, June 19, 2008 and USCG–2010–0351, 75 FR 49410, Aug. 13, 2010.

§ 116.01 General.

(a) All bridges are obstructions to navigation and are tolerated only as long as they serve the needs of land transportation while allowing for the reasonable needs of navigation.

(b) This part describes the general procedures by which the U.S. Coast Guard determines a bridge to be an unreasonable obstruction to navigation and issues an Order to Alter under the authority of

the following statutes, as appropriate: Section 18 of the Rivers and Harbors Appropriations Act of 1899, 33 U.S.C. 502; Section 4 of the Bridge Act of 1906, 33 U.S.C. 494; or the Truman-Hobbs Act of 1940, as amended, 33 U.S.C. 511–524.

(c) A bridge constructed across a navigable water of the United States shall not unreasonably obstruct the free navigation of the water over which it was constructed, either due to insufficient height or width of the navigation span, or because of difficulty in passing through the draw opening. If any bridge unreasonably obstructs navigation, the Commandant, U.S. Coast Guard, will order the alteration of that bridge. Alterations may include structural changes, replacement, or removal of the bridge.

(d) Whenever the Coast Guard has good reason to believe that a bridge across any of the navigable waters of the United States is an unreasonable obstruction to navigation, the Coast Guard will give notice to the owner of the bridge and other interested parties, and hold a public meeting at which the interested parties will have a full opportunity to be heard and to provide information on the question of whether alterations to the bridge are necessary and, if so, the extent of alterations needed.

(e) If the Coast Guard determines that alterations to a bridge are necessary, the Commandant, U.S. Coast Guard, will issue to the bridge owner an Order to Alter containing details of the alterations necessary to render navigation through or under the bridge reasonably free, easy, and unobstructed.

(1) In the case of a railroad or publicly owned highway bridge, an Order to Alter is issued to the bridge owner under the provisions of the Truman-Hobbs Act (33 U.S.C. 511 *et seq.*). In ordering these alterations, the Coast Guard will give due regard to the necessities of free and unobstructed navigation and of rail and highway traffic. For alterations to bridges governed by the Truman-Hobbs Act, the Coast Guard must approve general plans, specifications, and contracts for the alteration project, as well as approving the apportionment of the total cost of the alterations between the United States and the bridge owner.

(2) For all other bridges, the Order to Alter will contain the required alterations for the bridge and will prescribe a reasonable time in which to accomplish the required alterations. The bridge owner is responsible for the entire cost of the required alterations.

[CGD 91–063, 60 FR 20902, Apr. 28, 1995, as amended by USCG–2010–0351, 75 FR 49410, Aug. 13, 2010]

§ 116.05 Complaints.

Any person, company, or other entity may submit to the District Commander of the Coast Guard district in which a bridge over a navigable water of the United States is located, a complaint that a bridge unreasonably obstructs navigation. The complaint must be in writing and include specific details to support the allegation.

§ 116.10 Preliminary review.

(a) Upon receipt of a written complaint, the District Commander will review the complaint to determine if, in the District Commander's opinion, the complaint is justified and whether a Preliminary Investigation is warranted.

(1) The District Commander's opinion as to whether or not the complaint warrants a Preliminary Investigation will be formed through informal discussions with the complainant, users of the affected waterway, the owner of the bridge, and other interested

parties.

(2) In forming an opinion, the District Commander may also review the district files, records of accidents, and details of any additional written complaints associated with the bridge in question.

(b) In the absence of any written complaint, the District Commander may decide, based on a bridge's accident history or other criteria, to conduct a Preliminary Investigation.

(c) The District Commander will inform the complainant and the Chief, Office of Bridge Programs of the determination of any Preliminary Review. If the District Commander decides that the bridge in question is not an unreasonable obstruction to navigation, the complainant will be provided with a brief summary of the information on which the District Commander based the decision and will be informed of the appeal process described in § 116.55. There will be no further investigation, unless additional information warrants a continuance or reopening of the case.

[CGD 91–063, 60 FR 20902, Apr. 28, 1995, as amended by CGD 96–026, 61 FR 33663, June 28, 1996; USCG–2013–0397, 78 FR 39174, July 1, 2013]

§ 116.15 Preliminary investigation.

(a) During the Preliminary Investigation, the District Commander will prepare a written report containing all pertinent information and submit the report, together with a recommendation for or against the necessity of a Detailed Investigation, to the Chief, Office of Bridge Programs.

(b) The Preliminary Investigation Report will include a description of the nature and extent of the obstruction, the alterations to the bridge believed necessary to meet the reasonable needs of existing and future navigation, the type and volume of waterway traffic, and a calculation of the benefits to navigation which would result from the proposed bridge alterations.

(c) The Chief, Office of Bridge Programs will review the Preliminary Investigation Report and make a Preliminary Decision whether or not to undertake a Detailed Investigation and a Public Meeting.

(d) If after reviewing the Preliminary Investigation Report, the Chief, Office of Bridge Programs decides that further investigation is not warranted, the complainant will be notified of the decision. This notification will include a brief summary of information on which the decision was based and details of the appeal process described in § 116.55.

[CGD 91–063, 60 FR 20902, Apr. 28, 1995, as amended by CGD 96–026, 61 FR 33663, June 28, 1996; USCG–2012–0306, 77 FR 37314, June 21, 2012; USCG–2013–0397, 78 FR 39174, July 1, 2013; USCG–2014–0410, 79 FR 38433, July 7, 2014]

§ 116.20 Detailed investigation.

(a) When the Chief, Office of Bridge Programs determines that a Detailed Investigation should be conducted, the District Commander will initiate an investigation that addresses all of the pertinent data regarding the bridge, including information obtained at a public meeting held under § 116.25. As part of the investigation, the District Commander will develop a comprehensive report, termed the “Detailed Investigation Report”, which will discuss: the obstructive character of the bridge in question; the impact of that bridge upon navigation; navigational benefits derived; whether an alteration is needed to meet the needs of navigation; and, if alteration is recommended, what type.

(b) The District Commander will forward the completed Detailed Investigation Report to the Chief,

Office of Bridge Programs for review together with a recommendation of whether the bridge should be declared an unreasonable obstruction to navigation and, if so, whether an Order to Alter should be issued.

[CGD 91–063, 60 FR 20902, Apr. 28, 1995, as amended by CGD 96–026, 61 FR 33663, June 28, 1996; USCG–2013–0397, 78 FR 39174, July 1, 2013]

§ 116.25 Public meetings.

(a) Any time the Chief, Office of Bridge Programs determines that a Detailed Investigation is warranted, or when Congress declares a bridge unreasonably obstructive, the District Commander will hold a public meeting near the location of the bridge to provide the bridge owner, waterway users, and other interested parties the opportunity to offer evidence and be heard, orally or in writing, as to whether any alterations are necessary to provide reasonably free, safe, and unobstructed passage for waterborne traffic. The District Commander will issue a public notice announcing the public meeting stating the time, date, and place of the meeting.

(b) When a bridge is statutorily determined to be an unreasonable obstruction, the scope of the meeting will be to determine what navigation clearances are needed.

(c) In all other cases, the scope of the meeting will be to address issues bearing on the question of whether the bridge is an unreasonable obstruction to navigation and, if so, what alterations are needed.

(d) The meeting will be recorded. Copies of the public meeting transcript will be available for purchase from the recording service.

[CGD 91–063, 60 FR 20902, Apr. 28, 1995, as amended by CGD 96–026, 61 FR 33664, June 28, 1996; USCG–2013–0397, 78 FR 39174, July 1, 2013]

§ 116.30 Chief, Office of Bridge Programs Review and Evaluation.

(a) Upon receiving a Detailed Investigation Report from a District Commander, the Chief, Office of Bridge Programs will review all the information and make a final determination of whether or not the bridge is an unreasonable obstruction to navigation and, if so, whether to issue an Order to Alter. This determination will be accompanied by a supporting written Decision Analysis which will include a Benefit/Cost Analysis, including calculation of a Benefit/Cost Ratio.

(b) The Benefit/Cost ratio is calculated by dividing the annualized navigation benefit of the proposed bridge alteration by the annualized government share of the cost of the alteration.

(c) Except for a bridge which is statutorily determined to be an unreasonable obstruction, an Order to Alter will not be issued under the Truman-Hobbs Act unless the ratio is at least 1:1.

(d) If a bridge is statutorily determined to unreasonably obstruct navigation, the Chief, Office of Bridge Programs will prepare a Decision Analysis to document and provide details of the required vertical and horizontal clearances and the reasons alterations are necessary.

(e) If the Chief, Office of Bridge Programs decides to recommend that the Commandant issue an Order to Alter, or a bridge is statutorily determined to unreasonably obstruct navigation, the Chief, Office of Bridge Programs will issue a letter to the bridge owner (“The 60-Day Letter”) at least 60 days before the Commandant issues an Order to Alter. This letter will contain the reasons an alteration is necessary, the proposed alteration, and, in the case of a Truman-Hobbs bridge, an estimate of the total project cost and the bridge owner's share.

(f) If the bridge owner does not agree with the terms proposed in the 60-Day Letter, the owner may request a reevaluation of the terms. The request for a reevaluation must be in writing, and identify the terms for which reevaluation is requested. The request may provide additional information not previously presented.

(g) Upon receipt of the bridge owner's response, the Chief, Office of Bridge Programs will reevaluate the situation based on the additional information submitted by the bridge owner. If after the Chief, Office of Bridge Programs reviews the determination, there is no change, the Commandant may issue an Order to Alter as set out in § 116.35. The Administrator, Office of Bridge Programs determination based on the reevaluation will constitute final agency action.

[CGD 91–063, 60 FR 20902, Apr. 28, 1995, as amended by CGD 96–026, 61 FR 33664, June 28, 1996; USCG–2013–0397, 78 FR 39174, July 1, 2013]

§ 116.35 Order to Alter.

(a) If the bridge owner agrees with the contents of the 60-Day Letter, if no reply is received by 60 days after the issuance of the letter, or if after reevaluation a bridge is determined to be an unreasonable obstruction to navigation, the Commandant will issue an Order to Alter.

(1) If a bridge is eligible for funding under the Truman-Hobbs Act, the Order to Alter will specify the navigational clearances to be accomplished in order to meet the reasonable needs of navigation.

(2) An Order to Alter for a bridge that is not eligible for Truman-Hobbs funding will specify the navigational clearances that are required to meet the reasonable needs of navigation and will prescribe a reasonable time in which to accomplish them.

(b) If appropriate, the Order to Alter will be accompanied by a letter of special conditions setting forth safeguards needed to protect the environment or to provide for any special needs of navigation.

(c) If a proposed alteration to a bridge has desirable, non-navigational benefits, the Chief, Office of Bridge Programs may require an equitable contribution from any interested person, firm, association, corporation, municipality, county, or state benefiting from the alteration as a prerequisite to the making of an Order to Alter for that alteration.

(d) Failure to comply with any Order to Alter issued under the provisions of this part will subject the owner or controller of the bridge to the penalties prescribed in 33 U.S.C. 495, 502, 519, or any other applicable provision.

[CGD 91–063, 60 FR 20902, Apr. 28, 1995, as amended by CGD 96–026, 61 FR 33664, June 28, 1996; USCG–2013–0397, 78 FR 39174, July 1, 2013]

§ 116.40 Plans and specifications under the Truman-Hobbs Act.

(a) After an Order to Alter has been issued to a bridge owner under the Truman-Hobbs Act, the Chief, Office of Bridge Programs will issue a letter to the bridge owner outlining the owner's responsibilities to submit plans and specifications to the Chief, Office of Bridge Programs for the alteration of the bridge. The plans and specifications, at a minimum, must provide for the clearances identified in the Order to Alter. The plans and specifications may also include any other additional alteration to the bridge that the owner considers desirable to meet the requirements of railroad or highway traffic. During the alteration process, balanced consideration shall be given to the needs of rail, highway, and marine traffic.

(b) The Chief, Office of Bridge Programs will approve or reject the plans and specifications submitted by the bridge owner, in whole or in part, and may require the submission of new or additional plans and specifications.

(c) When Chief, Office of Bridge Programs has approved the submitted plans and specifications, they are final and binding upon all parties, unless later changes are approved by the Chief, Office of Bridge Programs. Any changes to the approved plans will be coordinated with the District Commander.

[CGD 91–063, 60 FR 20902, Apr. 28, 1995, as amended by CGD 96–026, 61 FR 33664, June 28, 1996; USCG–2013–0397, 78 FR 39174, July 1, 2013]

§ 116.45 Submission of bids, approval of award, guaranty of cost, and partial payments for bridges eligible for funding under the Truman-Hobbs Act.

(a) Once the plans and specifications for a bridge eligible for funding under the Truman-Hobbs Act have been approved, the bridge owner must take bids for the alteration of the bridge consistent with the approved plans and specifications. Those bids must then be submitted to the Chief, Office of Bridge Programs for approval.

(b) After the bridge owner submits the guaranty of cost required by 33 U.S.C. 515, the Chief, Office of Bridge Programs authorizes the owner to award the contract.

(c) Partial payments of the government's costs are authorized as the work progresses to the extent that funds have been appropriated.

[CGD 91–063, 60 FR 20902, Apr. 28, 1995, as amended by CGD 96–026, 61 FR 33664, June 28, 1996; USCG–2013–0397, 78 FR 39174, July 1, 2013; USCG–2014–0410, 79 FR 38433, July 7, 2014]

§ 116.50 Apportionment of costs under the Truman-Hobbs Act.

(a) In determining the apportionment of costs, the bridge owner must bear such part of the cost attributable to the direct and special benefits which will accrue to the bridge owner as a result of alteration to the bridge, including expected savings in repairs and maintenance, expected increased carrying capacity, costs attributable to the requirements of highway and railroad traffic, and actual capital costs of the used service life. The United States will bear the balance of the costs, including that part attributable to the necessities of navigation.

(b) “Direct and special benefits” ordinarily will include items desired by the owner but which have no counterpart or are of higher quality than similar items in the bridge prior to alteration. Examples include improved signal and fender systems, pro rata share of dismantling costs, and improvements included, but not required, in the interests of navigation.

(c) During the development of the Apportionment of Costs, the bridge owner will be provided with an opportunity to be heard. Proportionate shares of cost to be borne by the United States and the bridge owner are developed in substantially the following form:

> Total cost of project _____ $_____
> Less salvage ____ $____
> Less contribution by third party ____ $____
> Cost of alteration to be apportioned
> ____ $____
> Share to be borne by the bridge owner:

Direct and Special Benefits:
a. Removing old bridge ____ $____
b. Fixed charges ____ $____
c. Betterments ____ $____
Expected savings in repair or maintenance costs:
a. Repair ____ $____
b. Maintenance ____ $____
Costs attributable to requirements of railroad and/or highway traffic ____ $____
Expenditure for increased carrying capacity ____ $____
Expired service life of old bridge ____ $____
Subtotal ____ $____
Share to be borne by the bridge owner
____ $____
Contingencies ____ $____
Total ____ $____
Share to be borne by the United States
____ $____
Contingencies ____ $____
Total ____ $____

(d) The Order of Apportionment of Costs will include the guaranty of costs.

§ 116.55 Appeals.

(a) Except for the decision to issue an Order to Alter, if a complainant disagrees with a recommendation regarding obstruction or eligibility made by a District Commander, or the Chief, Office of Bridge Programs, the complainant may appeal that decision to the Deputy Commandant for Operations.

(b) The appeal must be submitted in writing to the Commandant (CG–DCO–D), Attn: Deputy for Operations Policy and Capabilities, U.S. Coast Guard Stop 7318, 2703 Martin Luther King Jr. Avenue SE., Washington, DC 20593–7318, within 60 days after the District Commander's or the Chief, Office of Bridge Programs decision. The Deputy Commandant for Operations will make a decision on the appeal within 90 days after receipt of the appeal. The Deputy Commandant of Operations' decision of this appeal shall constitute final agency action.

(c) Any Order of Apportionment made or issued under section 6 of the Truman-Hobbs Act, 33 U.S.C. 516, may be reviewed by the Court of Appeals for any judicial circuit in which the bridge in question is wholly or partly located, if a petition for review is filed within 90 days after the date of issuance of the order. The review is described in section 10 of the Truman-Hobbs Act, 33 U.S.C. 520. The review proceedings do not operate as a stay of any order issued under the Truman-Hobbs Act, other than an order of apportionment, nor relieve any bridge owner of any liability or penalty under other provisions of that act.

[CGD 91–063, 60 FR 20902, Apr. 28, 1995, as amended by CGD 96–026, 61 FR 33663, June 28, 1996; CGD 97–023, 62 FR 33363, June 19, 1997; USCG–2008–0179, 73 FR 35013, June 19, 2008; USCG–2010–0351, 75 FR 36283, June 25, 2010; USCG–2013–0397, 78 FR 39174, July 1, 2013; USCG–2014–0410, 79 FR 38433, July 7, 2014]

Interstate Bridge Replacement "Draft SEIS public comment"

Columbia River Crossings commonly known as the I-5 Bridges and several other adjacent properties have 4(f) Historical Resources with federal protection. If it is Feasible or Prudent it is required to avoid these properties.

It is both Feasible and Prudent to avoid the I-5 bridges and adjacent properties.

Feasible
It is Feasible to construct a new bridge adjacent to the BNSF rail bridge a location that has been recommend as a port to port connection for decades. The two deep water ports and transcontinental rail line are at the center of the project area.

Prudent
It is Prudent to avoid the I-5 bridges and the I-5 freeway.

Add capacity across the Columbia River
I-5 Portland / Vancouver Transportation and Trade Partnership in 2002 data showed we have fewer bridges than similar sized metropolitan and locally we have twelve bridges over the Willamette and only two across the Columbia River. Recommendations from the Environmental Impact Statement (EIS) stated to add capacity across The Columbia River with a supplemental or replacement bridge.

I-5 bridges have decades of life lift according to resent inspection
In 2005 the independent inspection of the Columbia River Crossings known as the I-5 bridges stated they are remarkable with 60 years of life left, no restrictions, meets all requirements, are worth a billion dollars and are protected as 4(f) Historical Resources for being an engineering marvel of it's time. Constructed in 1917 there are six bridges in Portland in use older and a dozen older that the1958 twin bridge. The bridges Level Of Service for an A rating is 88,000 vehicles daily, current users approximately 140,000 A bridge's dondition not ages is a reason to remove valuable infrastructure.

Keeping quality needed infrastructure the bridge has 60 years of life and adding a supplemental bridge across the Columbia River when you need capacity is Prudent.

The I-5 freeway south of the I-bridges is rated F for Level Of Service.
Level Of Service FHWA rating of the I-5 freeway south of the bridge is rated F for overcapacity causing approximately 30,000 vehicles daily into adjacent neighborhood streets. The freeway is overcapacity in both directions through North Portland from I-405 to the I-5 bridges causing hours of congestion seven days a week. The fact that the I-5 freeway and bridges are over capacity is not the fault of the bridges.

Oregon State Historic Preservation Office (SHPO) stated during the Columbia River Crossing that they did not study alternatives that left the bridges intact. CRC did not provide upgrades to mitigated issue the concerns with the current bridges..

The challenges identified with the current I -5 bridges can be mitigated

Addition of a promenade to historic bridges
Bicycle and Pedestrian Path on the I-5 bridge upgraded to a wide pedestrian promenade on the east

bridge between Portland and Vancouver connecting to the current bike pedestrian system.

Seismic

The I-5 Partnership EIS stated the bridges could be retro-fit and gave an approximately $50-million dollar estimate. In 2007 and 2010 and in 2021 requests to have a full independent seismic inspection with alternatives showing different levels of protections for 100, 500, and 1,000 years seismic events and the different cost. The information on seismic upgrades by a company specializing in retro-fitting have not been provided to the public.

Safety entering and exiting the I-5 bridges

The I-5 bridges still have their original 1917 and 1958 access alignments and can be relined inside the current Right Of Way to address issues of short lanes.

More bridges more options when an accident happens. Replacing one bridge with one bridge means one accident will still shut down the new bridge too. Two bridge locations one accident does not shut the entire system down.

Impaired freight movement due to lack of capacity

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 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. Adding an additional freeway bridge connecting to the I-5 freeway and crossing at the ports will provide congestion relief. The port alignment is one-mile west the I-205 is six miles when the majority of the traffic is heading west toward the terminals.

95% less lifts on the historic Columbia River Crossing bridges

The I-5 Partnership data showed that adding a second lift to the BNSF rail bridge would lessen the lifts on the I-5 bridges by 95% from approximately 400 to 30 lifts a year. A second lift in the BNSF rail bridges that is in-line with the I-5 barge channels would remove one of the US Coast Guard's top water hazards

In conclusion

The I-5 and the I-205 freeways are overcapacity and rated F for Level Of Service (LOS) by the FHWA several hours everyday. The I-5 and I-205 bridges are both over capacity and have no restrictions with several years of serviceable life left. A new port to port bridge freeway corridor bi-pass adjacent to the BNSF rail line has been in formerly Adopted Region Transportation Plans (RTP) since before 2000. We have been one of the top 10 congested cities in the nation almost every year for 20 years yet we are 26th in size and 60th in density. Previous studies have stated we need to add capacity not to remove sound bridges.

It is both Feasible and Prudent to realign the on/ off ramps, add a promenade for bike and pedestrian, lessen the lifts by 95% by removing water hazard, seismically retro-fit the bridges, less congestion and pollution for the community by an additional freeway in and out of the ports and industrial areas. Construct a third bridge and let the current I-5 bridges have the 60 years of life left that they deserve for being in such great shape.

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Attachments

(a) I-5 Bridge Condition
(b) I-5 Portland / Vancouver Transportation and Trade Partnership recommendations
(c) Daily Vehicle Count to Rivergate
(d) US Coast Guard Steven Fischer BNSF rail bridge
Metro President David Bragdon two letters address project concerns

Original Project Scope video
CRC presentation to Joint Oregon/Washington Transportation Commission "Original Project Scope" adding capacity across the Columbia River https://www.youtube.com/watch?v=CzQwLDHJo_M

Metro a CRC Signatory Agency, President and Project Sponsor Council member David Bragdon letter date May 5, 2021
http://www.nobridgetolls.com/nasset/docs/B%20%20%20%20%209%20%20David%20Bragdon%20May%205.pdf

Metro a CRC Signatory Agency, President and Project Sponsor Council member David Bragdon letter date May 19, 2010
http://www.nobridgetolls.com/nasset/docs/A%2010%20DavidBragdonCRCReviewMay19.pdf

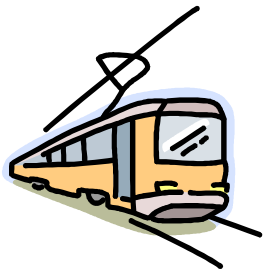
Port Commissioner Arch Miller and CRC remove alternatives against NEPA Policies
Watch CRC staff remove RC-14 a community supported third bridge alternative without any process. http://www.youtube.com/watch?v=jdnbvv6Rtgg This video is former Vancouver Port Commissioner Arch Miller telling the CRC Task Force advisory citizen committee to remove and not study the Third Bridge Corridor (RC-14) brought in during NEPA Scoping violate the NEPA EIS. The fact that an elected official would brazenly stand up and tell the official CRC Task Force and community that "HE" Thinks and What "HE" wants and what "HE" believes we MUST do as we are told! Totally scrapping having a fair and honest process or a comparable alternative.

Description Third Bridge Now
New freeway corridor is fully multi-modal alignment starting at I-5 and Mill Plain in Vancouver, crossing into Oregon and going south through Swan Island I-5, I-84, I-405, and west to HWY-30.
Freeway
Speed 55 MPH
Lift No
High capacity on/off ramps Yes
Freeway 6-lanes 2000 per hour per lane
Managed 2-lanes 2000 per hour per lane
Heavy rail 2-track unknown capacity
Third Bridge Now moving map link https://www.youtube.com/watch?v=nzaMpNR-Wj8&t=1006s

Thank you,
Sharon Nasset
[redacted]

Public comment for the DSEIS for IBP November18,2024
WWW>ThridBridgeNow.org

Final Recommendations at a Glance



Transit:

- Provide a phased light rail loop in Clark County in the vicinity of the I-5, SR500/4th Plain and I-205 Corridors.
- Provide peak-hour, premium express bus service in the I-5 and I-205 Corridors to markets not well served by light rail.
- Increase transit service in the Corridor over the next 20 years called for in regional transportation plans.



Interstate 5:

- The I-5 freeway between the Fremont Bridge in Portland and the I-205 interchange in Vancouver will be a maximum of 3 through lanes in each direction. This includes widening I-5 to 3 lanes between Delta Park and Lombard, and 99th St. to I-205 in Vancouver.
- Designate one of the 3 through lanes for use as a high occupancy vehicle (HOV) lane during the peak period, in the peak direction.
- Add a new supplemental or replacement bridge across the Columbia River with up to 2 auxiliary and/or arterial lanes in each direction, and 2 light rail tracks.
- Improve interchanges between SR 500 and Columbia Blvd to address safety and capacity problems -- including making Columbia Blvd into a full interchange.
- In adding river crossing capacity and making interchange improvements every effort should be made to: 1) avoid displacements and encroachments, 2) minimize the highway footprint and 3) minimize the use of the freeway for local trips.



Additional Rail Capacity:

- Pursue the rail infrastructure improvements required to accommodate anticipated 20 year freight rail growth in the I-5 Corridor and frequent, efficient intercity passenger rail service.
- Establish a public/private Bi-State rail forum to advise regional decision makers about prioritizing, scheduling and funding of needed rail improvements.
- The rail forum and regional decision-makers should encourage funding for:
  - Additional inter-city passenger rail service in the Pacific Northwest High Speed Rail Corridor
  - High Speed Rail service in the Corridor; and
  - The replacement of the existing "swing span" with a "lift span" located closer to the center of the river channel



Land Use:

- Adopt and implement a Bi-State Coordination Accord to protect existing and new capacity and support economic development.
- Jurisdictions in the Corridor will develop and agree on a plan to manage land development to avoid adversely impacting I-5 or the Region's growth management plans.



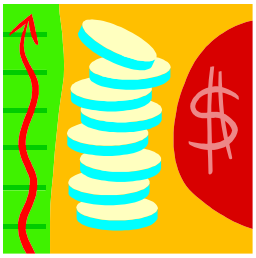
Transportation Demand and System Management:

- Commit to a comprehensive use of TDM/TSM strategies -- alternative modes, work-based strategies, policies and regulatory strategies, pricing and TSM strategies -- and pursue additional funding for transit and TDM/TSM strategies.
- Prepare an "I-5 TDM/TSM Corridor Plan" with guidance from the proposed "Bi-State Coordination Committee"
- Fund and implement additional TDM/TSM strategies now to encourage more efficient use of the transportation system.



Environmental Justice

- Establish a Community Enhancement Fund for use in the impacted areas in the I-5 Corridor in Oregon and Washington
- Map low-income and minority communities in the corridor.
- Take list of potential impacts identified by representatives of environmental justice communities into the EIS for the Bridge and Bridge Influence Area as a starting point for more analysis.
- Work with affected communities to explore ways to offset impacts and/or bring benefits to the community.
- Develop a public outreach plan for EIS process that includes special outreach to low-income and minority communities.
- Form and coordinate two working groups for the EIS -- one for public involvement and one for environmental justice.



Finance

- OR, WA and the Portland/Vancouver region should develop a financing plan for transit and highway capital projects
- Tri-Met and C-Tran need to increase revenues for a significant expansion of transit service, starting within the next five years.
- Establish regional transit financing commitments that will allow for:
  - an aggressive bi-state TDM program and
  - an expansion of transit service to support the light rail loop.
- Seek funding to widen I-5 to 3 lanes: Delta Park to Lombard after environmental and design work is completed.



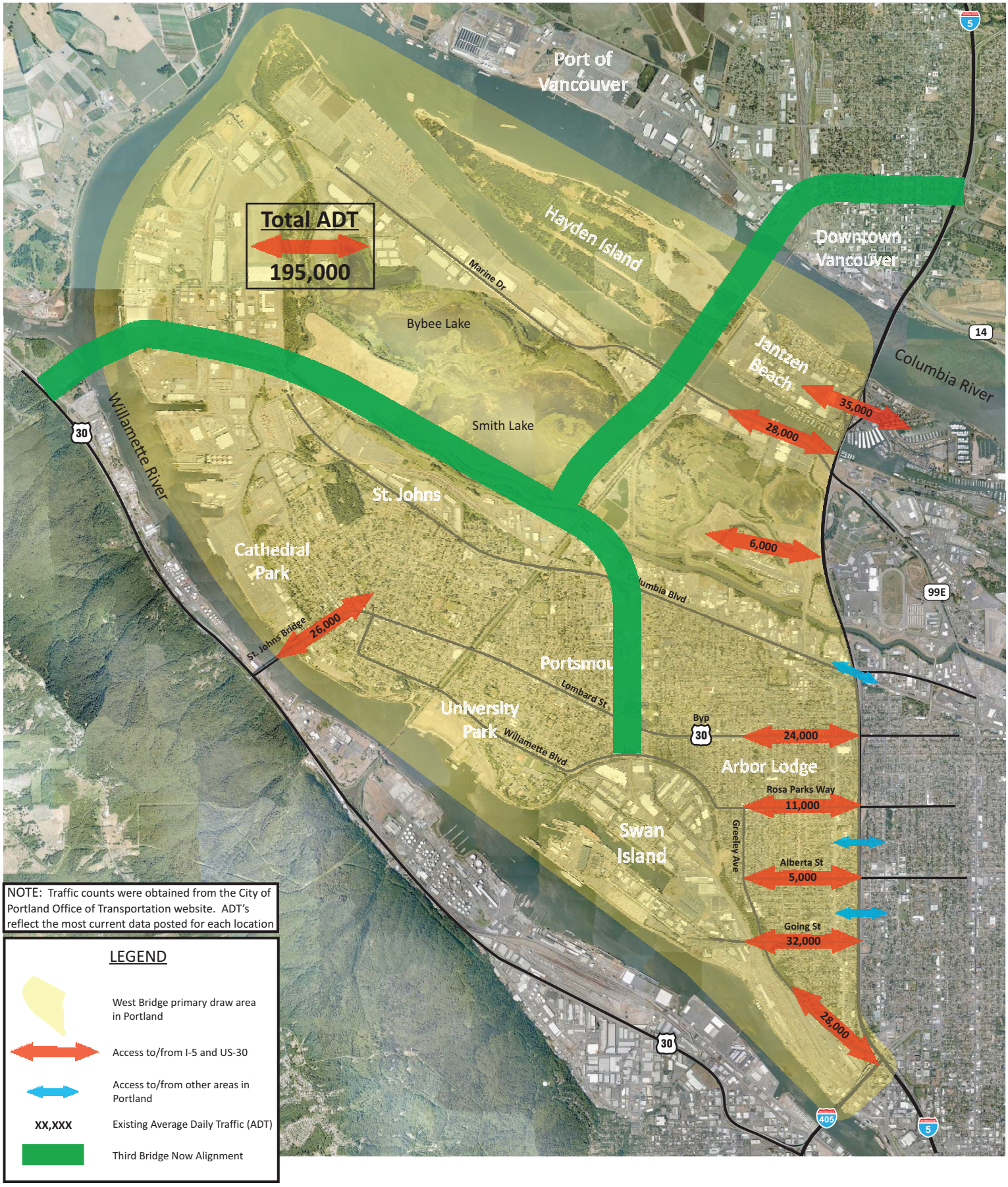
Next Steps/Implementation

- Fall 2002: SW Washington Regional Transportation Council and Metro review and amend the Regional Transportation Plans to incorporate recommended I-5 corridor improvements.

- Delta Park to Lombard: widen I-5 to 3 lanes
  - Summer 2002-2004: Conduct environmental assessment and design work
  - Post 2004: Construction of Delta Park to Lombard

- 2003 – 2009: Environmental Impact Study on Bridge Influence Area
  (new supplemental or replacement bridge, interchange improvements between SR 500 and Columbia Blvd., including light rail between Expo Center and downtown Vancouver)

- 2010+: Construct improvements in Bridge Influence Area.



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ENGINEERING AND PLANNING SERVICES

Figure 2
Existing Traffic Flows
Third Bridge Corridor Preliminary Benefit Analysis

This content is from the eCFR and is authoritative but unofficial.

Displaying title 33, up to date as of 5/24/2023. Title 33 was last amended 5/23/2023.

Title 33 —Navigation and Navigable Waters
Chapter I —Coast Guard, Department of Homeland Security
Subchapter J —Bridges

ENHANCED CONTENT - TABLE OF CONTENTS

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PART 116—ALTERATION OF UNREASONABLY OBSTRUCTIVE BRIDGES

Authority: 33 U.S.C. 401, 521.

Source: CGD 91–063, 60 FR 20902, Apr. 28, 1995, unless otherwise noted.

EDITORIAL NOTE

Editorial Note: Nomenclature changes to part 116 appear by USCG–2008–0179, 73 FR 35012, June 19, 2008 and USCG–2010–0351, 75 FR 49410, Aug. 13, 2010.

§ 116.01 General.

(a) All bridges are obstructions to navigation and are tolerated only as long as they serve the needs of land transportation while allowing for the reasonable needs of navigation.

(b) This part describes the general procedures by which the U.S. Coast Guard determines a bridge to be an unreasonable obstruction to navigation and issues an Order to Alter under the authority of

the following statutes, as appropriate: Section 18 of the Rivers and Harbors Appropriations Act of 1899, 33 U.S.C. 502; Section 4 of the Bridge Act of 1906, 33 U.S.C. 494; or the Truman-Hobbs Act of 1940, as amended, 33 U.S.C. 511–524.

(c) A bridge constructed across a navigable water of the United States shall not unreasonably obstruct the free navigation of the water over which it was constructed, either due to insufficient height or width of the navigation span, or because of difficulty in passing through the draw opening. If any bridge unreasonably obstructs navigation, the Commandant, U.S. Coast Guard, will order the alteration of that bridge. Alterations may include structural changes, replacement, or removal of the bridge.

(d) Whenever the Coast Guard has good reason to believe that a bridge across any of the navigable waters of the United States is an unreasonable obstruction to navigation, the Coast Guard will give notice to the owner of the bridge and other interested parties, and hold a public meeting at which the interested parties will have a full opportunity to be heard and to provide information on the question of whether alterations to the bridge are necessary and, if so, the extent of alterations needed.

(e) If the Coast Guard determines that alterations to a bridge are necessary, the Commandant, U.S. Coast Guard, will issue to the bridge owner an Order to Alter containing details of the alterations necessary to render navigation through or under the bridge reasonably free, easy, and unobstructed.

(1) In the case of a railroad or publicly owned highway bridge, an Order to Alter is issued to the bridge owner under the provisions of the Truman-Hobbs Act (33 U.S.C. 511 *et seq.*). In ordering these alterations, the Coast Guard will give due regard to the necessities of free and unobstructed navigation and of rail and highway traffic. For alterations to bridges governed by the Truman-Hobbs Act, the Coast Guard must approve general plans, specifications, and contracts for the alteration project, as well as approving the apportionment of the total cost of the alterations between the United States and the bridge owner.

(2) For all other bridges, the Order to Alter will contain the required alterations for the bridge and will prescribe a reasonable time in which to accomplish the required alterations. The bridge owner is responsible for the entire cost of the required alterations.

[CGD 91–063, 60 FR 20902, Apr. 28, 1995, as amended by USCG–2010–0351, 75 FR 49410, Aug. 13, 2010]

§ 116.05 Complaints.

Any person, company, or other entity may submit to the District Commander of the Coast Guard district in which a bridge over a navigable water of the United States is located, a complaint that a bridge unreasonably obstructs navigation. The complaint must be in writing and include specific details to support the allegation.

§ 116.10 Preliminary review.

(a) Upon receipt of a written complaint, the District Commander will review the complaint to determine if, in the District Commander's opinion, the complaint is justified and whether a Preliminary Investigation is warranted.

(1) The District Commander's opinion as to whether or not the complaint warrants a Preliminary Investigation will be formed through informal discussions with the complainant, users of the affected waterway, the owner of the bridge, and other interested

parties.

(2) In forming an opinion, the District Commander may also review the district files, records of accidents, and details of any additional written complaints associated with the bridge in question.

(b) In the absence of any written complaint, the District Commander may decide, based on a bridge's accident history or other criteria, to conduct a Preliminary Investigation.

(c) The District Commander will inform the complainant and the Chief, Office of Bridge Programs of the determination of any Preliminary Review. If the District Commander decides that the bridge in question is not an unreasonable obstruction to navigation, the complainant will be provided with a brief summary of the information on which the District Commander based the decision and will be informed of the appeal process described in § 116.55. There will be no further investigation, unless additional information warrants a continuance or reopening of the case.

[CGD 91–063, 60 FR 20902, Apr. 28, 1995, as amended by CGD 96–026, 61 FR 33663, June 28, 1996; USCG–2013–0397, 78 FR 39174, July 1, 2013]

§ 116.15 Preliminary investigation.

(a) During the Preliminary Investigation, the District Commander will prepare a written report containing all pertinent information and submit the report, together with a recommendation for or against the necessity of a Detailed Investigation, to the Chief, Office of Bridge Programs.

(b) The Preliminary Investigation Report will include a description of the nature and extent of the obstruction, the alterations to the bridge believed necessary to meet the reasonable needs of existing and future navigation, the type and volume of waterway traffic, and a calculation of the benefits to navigation which would result from the proposed bridge alterations.

(c) The Chief, Office of Bridge Programs will review the Preliminary Investigation Report and make a Preliminary Decision whether or not to undertake a Detailed Investigation and a Public Meeting.

(d) If after reviewing the Preliminary Investigation Report, the Chief, Office of Bridge Programs decides that further investigation is not warranted, the complainant will be notified of the decision. This notification will include a brief summary of information on which the decision was based and details of the appeal process described in § 116.55.

[CGD 91–063, 60 FR 20902, Apr. 28, 1995, as amended by CGD 96–026, 61 FR 33663, June 28, 1996; USCG–2012–0306, 77 FR 37314, June 21, 2012; USCG–2013–0397, 78 FR 39174, July 1, 2013; USCG–2014–0410, 79 FR 38433, July 7, 2014]

§ 116.20 Detailed investigation.

(a) When the Chief, Office of Bridge Programs determines that a Detailed Investigation should be conducted, the District Commander will initiate an investigation that addresses all of the pertinent data regarding the bridge, including information obtained at a public meeting held under § 116.25. As part of the investigation, the District Commander will develop a comprehensive report, termed the “Detailed Investigation Report”, which will discuss: the obstructive character of the bridge in question; the impact of that bridge upon navigation; navigational benefits derived; whether an alteration is needed to meet the needs of navigation; and, if alteration is recommended, what type.

(b) The District Commander will forward the completed Detailed Investigation Report to the Chief,

Office of Bridge Programs for review together with a recommendation of whether the bridge should be declared an unreasonable obstruction to navigation and, if so, whether an Order to Alter should be issued.

[CGD 91–063, 60 FR 20902, Apr. 28, 1995, as amended by CGD 96–026, 61 FR 33663, June 28, 1996; USCG–2013–0397, 78 FR 39174, July 1, 2013]

§ 116.25 Public meetings.

(a) Any time the Chief, Office of Bridge Programs determines that a Detailed Investigation is warranted, or when Congress declares a bridge unreasonably obstructive, the District Commander will hold a public meeting near the location of the bridge to provide the bridge owner, waterway users, and other interested parties the opportunity to offer evidence and be heard, orally or in writing, as to whether any alterations are necessary to provide reasonably free, safe, and unobstructed passage for waterborne traffic. The District Commander will issue a public notice announcing the public meeting stating the time, date, and place of the meeting.

(b) When a bridge is statutorily determined to be an unreasonable obstruction, the scope of the meeting will be to determine what navigation clearances are needed.

(c) In all other cases, the scope of the meeting will be to address issues bearing on the question of whether the bridge is an unreasonable obstruction to navigation and, if so, what alterations are needed.

(d) The meeting will be recorded. Copies of the public meeting transcript will be available for purchase from the recording service.

[CGD 91–063, 60 FR 20902, Apr. 28, 1995, as amended by CGD 96–026, 61 FR 33664, June 28, 1996; USCG–2013–0397, 78 FR 39174, July 1, 2013]

§ 116.30 Chief, Office of Bridge Programs Review and Evaluation.

(a) Upon receiving a Detailed Investigation Report from a District Commander, the Chief, Office of Bridge Programs will review all the information and make a final determination of whether or not the bridge is an unreasonable obstruction to navigation and, if so, whether to issue an Order to Alter. This determination will be accompanied by a supporting written Decision Analysis which will include a Benefit/Cost Analysis, including calculation of a Benefit/Cost Ratio.

(b) The Benefit/Cost ratio is calculated by dividing the annualized navigation benefit of the proposed bridge alteration by the annualized government share of the cost of the alteration.

(c) Except for a bridge which is statutorily determined to be an unreasonable obstruction, an Order to Alter will not be issued under the Truman-Hobbs Act unless the ratio is at least 1:1.

(d) If a bridge is statutorily determined to unreasonably obstruct navigation, the Chief, Office of Bridge Programs will prepare a Decision Analysis to document and provide details of the required vertical and horizontal clearances and the reasons alterations are necessary.

(e) If the Chief, Office of Bridge Programs decides to recommend that the Commandant issue an Order to Alter, or a bridge is statutorily determined to unreasonably obstruct navigation, the Chief, Office of Bridge Programs will issue a letter to the bridge owner (“The 60-Day Letter”) at least 60 days before the Commandant issues an Order to Alter. This letter will contain the reasons an alteration is necessary, the proposed alteration, and, in the case of a Truman-Hobbs bridge, an estimate of the total project cost and the bridge owner's share.

(f) If the bridge owner does not agree with the terms proposed in the 60-Day Letter, the owner may request a reevaluation of the terms. The request for a reevaluation must be in writing, and identify the terms for which reevaluation is requested. The request may provide additional information not previously presented.

(g) Upon receipt of the bridge owner's response, the Chief, Office of Bridge Programs will reevaluate the situation based on the additional information submitted by the bridge owner. If after the Chief, Office of Bridge Programs reviews the determination, there is no change, the Commandant may issue an Order to Alter as set out in § 116.35. The Administrator, Office of Bridge Programs determination based on the reevaluation will constitute final agency action.

[CGD 91–063, 60 FR 20902, Apr. 28, 1995, as amended by CGD 96–026, 61 FR 33664, June 28, 1996; USCG–2013–0397, 78 FR 39174, July 1, 2013]

§ 116.35 Order to Alter.

(a) If the bridge owner agrees with the contents of the 60-Day Letter, if no reply is received by 60 days after the issuance of the letter, or if after reevaluation a bridge is determined to be an unreasonable obstruction to navigation, the Commandant will issue an Order to Alter.

(1) If a bridge is eligible for funding under the Truman-Hobbs Act, the Order to Alter will specify the navigational clearances to be accomplished in order to meet the reasonable needs of navigation.

(2) An Order to Alter for a bridge that is not eligible for Truman-Hobbs funding will specify the navigational clearances that are required to meet the reasonable needs of navigation and will prescribe a reasonable time in which to accomplish them.

(b) If appropriate, the Order to Alter will be accompanied by a letter of special conditions setting forth safeguards needed to protect the environment or to provide for any special needs of navigation.

(c) If a proposed alteration to a bridge has desirable, non-navigational benefits, the Chief, Office of Bridge Programs may require an equitable contribution from any interested person, firm, association, corporation, municipality, county, or state benefiting from the alteration as a prerequisite to the making of an Order to Alter for that alteration.

(d) Failure to comply with any Order to Alter issued under the provisions of this part will subject the owner or controller of the bridge to the penalties prescribed in 33 U.S.C. 495, 502, 519, or any other applicable provision.

[CGD 91–063, 60 FR 20902, Apr. 28, 1995, as amended by CGD 96–026, 61 FR 33664, June 28, 1996; USCG–2013–0397, 78 FR 39174, July 1, 2013]

§ 116.40 Plans and specifications under the Truman-Hobbs Act.

(a) After an Order to Alter has been issued to a bridge owner under the Truman-Hobbs Act, the Chief, Office of Bridge Programs will issue a letter to the bridge owner outlining the owner's responsibilities to submit plans and specifications to the Chief, Office of Bridge Programs for the alteration of the bridge. The plans and specifications, at a minimum, must provide for the clearances identified in the Order to Alter. The plans and specifications may also include any other additional alteration to the bridge that the owner considers desirable to meet the requirements of railroad or highway traffic. During the alteration process, balanced consideration shall be given to the needs of rail, highway, and marine traffic.

(b) The Chief, Office of Bridge Programs will approve or reject the plans and specifications submitted by the bridge owner, in whole or in part, and may require the submission of new or additional plans and specifications.

(c) When Chief, Office of Bridge Programs has approved the submitted plans and specifications, they are final and binding upon all parties, unless later changes are approved by the Chief, Office of Bridge Programs. Any changes to the approved plans will be coordinated with the District Commander.

[CGD 91–063, 60 FR 20902, Apr. 28, 1995, as amended by CGD 96–026, 61 FR 33664, June 28, 1996; USCG–2013–0397, 78 FR 39174, July 1, 2013]

§ 116.45 Submission of bids, approval of award, guaranty of cost, and partial payments for bridges eligible for funding under the Truman-Hobbs Act.

(a) Once the plans and specifications for a bridge eligible for funding under the Truman-Hobbs Act have been approved, the bridge owner must take bids for the alteration of the bridge consistent with the approved plans and specifications. Those bids must then be submitted to the Chief, Office of Bridge Programs for approval.

(b) After the bridge owner submits the guaranty of cost required by 33 U.S.C. 515, the Chief, Office of Bridge Programs authorizes the owner to award the contract.

(c) Partial payments of the government's costs are authorized as the work progresses to the extent that funds have been appropriated.

[CGD 91–063, 60 FR 20902, Apr. 28, 1995, as amended by CGD 96–026, 61 FR 33664, June 28, 1996; USCG–2013–0397, 78 FR 39174, July 1, 2013; USCG–2014–0410, 79 FR 38433, July 7, 2014]

§ 116.50 Apportionment of costs under the Truman-Hobbs Act.

(a) In determining the apportionment of costs, the bridge owner must bear such part of the cost attributable to the direct and special benefits which will accrue to the bridge owner as a result of alteration to the bridge, including expected savings in repairs and maintenance, expected increased carrying capacity, costs attributable to the requirements of highway and railroad traffic, and actual capital costs of the used service life. The United States will bear the balance of the costs, including that part attributable to the necessities of navigation.

(b) “Direct and special benefits” ordinarily will include items desired by the owner but which have no counterpart or are of higher quality than similar items in the bridge prior to alteration. Examples include improved signal and fender systems, pro rata share of dismantling costs, and improvements included, but not required, in the interests of navigation.

(c) During the development of the Apportionment of Costs, the bridge owner will be provided with an opportunity to be heard. Proportionate shares of cost to be borne by the United States and the bridge owner are developed in substantially the following form:

> Total cost of project _____ $_____
> Less salvage ____ $____
> Less contribution by third party ____ $____
> Cost of alteration to be apportioned
> ____ $____
> Share to be borne by the bridge owner:

Direct and Special Benefits:
a. Removing old bridge ____ $____
b. Fixed charges ____ $____
c. Betterments ____ $____
Expected savings in repair or maintenance costs:
a. Repair ____ $____
b. Maintenance ____ $____
Costs attributable to requirements of railroad and/or highway traffic ____ $____
Expenditure for increased carrying capacity ____ $____
Expired service life of old bridge ____ $____
Subtotal ____ $____
Share to be borne by the bridge owner
____ $____
Contingencies ____ $____
Total ____ $____
Share to be borne by the United States
____ $____
Contingencies ____ $____
Total ____ $____

(d) The Order of Apportionment of Costs will include the guaranty of costs.

§ 116.55 Appeals.

(a) Except for the decision to issue an Order to Alter, if a complainant disagrees with a recommendation regarding obstruction or eligibility made by a District Commander, or the Chief, Office of Bridge Programs, the complainant may appeal that decision to the Deputy Commandant for Operations.

(b) The appeal must be submitted in writing to the Commandant (CG–DCO–D), Attn: Deputy for Operations Policy and Capabilities, U.S. Coast Guard Stop 7318, 2703 Martin Luther King Jr. Avenue SE., Washington, DC 20593–7318, within 60 days after the District Commander's or the Chief, Office of Bridge Programs decision. The Deputy Commandant for Operations will make a decision on the appeal within 90 days after receipt of the appeal. The Deputy Commandant of Operations' decision of this appeal shall constitute final agency action.

(c) Any Order of Apportionment made or issued under section 6 of the Truman-Hobbs Act, 33 U.S.C. 516, may be reviewed by the Court of Appeals for any judicial circuit in which the bridge in question is wholly or partly located, if a petition for review is filed within 90 days after the date of issuance of the order. The review is described in section 10 of the Truman-Hobbs Act, 33 U.S.C. 520. The review proceedings do not operate as a stay of any order issued under the Truman-Hobbs Act, other than an order of apportionment, nor relieve any bridge owner of any liability or penalty under other provisions of that act.

[CGD 91–063, 60 FR 20902, Apr. 28, 1995, as amended by CGD 96–026, 61 FR 33663, June 28, 1996; CGD 97–023, 62 FR 33363, June 19, 1997; USCG–2008–0179, 73 FR 35013, June 19, 2008; USCG–2010–0351, 75 FR 36283, June 25, 2010; USCG–2013–0397, 78 FR 39174, July 1, 2013; USCG–2014–0410, 79 FR 38433, July 7, 2014]

IBR Draft SEIS - RECORD #3458 DETAIL

First Name :	Misty
Last Name :	Earisman
Attachments :	DSEIS-3458_Earisman_original.pdf (4 kb)

IBR Draft SEIS - RECORD #3458 DETAIL

Submission Date : 11/18/2024
First Name : Misty
Last Name : Earisman
Business/Organization/Agency :

Submission Input :

First Name:
Misty

Last Name:
Earisman

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
This freeway expansion is a terrible idea! Please don’t waste our money to build more lanes, we know it won’t reduce congestion!! I’m fine with the seismic replacement, light rail extension and bike and pedestrian improvements.

IBR Draft SEIS - RECORD #3460 DETAIL

First Name :	James
Last Name :	Maertin
Attachments :	DSEIS-3460_maertin_original.pdf (4 kb)

IBR Draft SEIS - RECORD #3460 DETAIL

Submission Date :	11/18/2024
First Name :	James
Last Name :	Maertin
Business/Organization/Agency :	James Maertin, CPA

Submission Input :

First Name:
James

Last Name:
Maertin

Business or Organization:
James Maertin, CPA

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
This bridge project is a thinly veiled massive freeway expansion. Public transit, walking and biking are

afterthoughts that are being worked in, with no regard for the inconvenience and difficulties these users will have to endure. This is indicative of the tremendous momentum that the car transportation system still has, despite overwhelming evidence of the huge damage it causes. I suspect, as a CPA, that a serious system of public transit and active transportation, on a bridge half the size of that being proposed, could be built for far less money.

IBR Draft SEIS - RECORD #3462 DETAIL

First Name :	Sharon
Last Name :	Thompson
Attachments :	DSEIS-3462_thompson_original.pdf (5 kb)

IBR Draft SEIS - RECORD #3462 DETAIL

Submission Date :	11/18/2024
First Name :	Sharon
Last Name :	Thompson
Business/Organization/Agency :	Hayden Island Resident

Submission Input :

First Name:
Sharon

Last Name:
Thompson

Business or Organization:
[redacted]

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Hayden Island Issues

Comment:
So many things about this project just don't add up.

1st A new report by Chris Smith shows that traffic numbers are over what actually is and will be carried by the new bridge. Truck traffic has gone DOWN in the last 20 yrs

2nd there are no numbers that support Hayden Island has had 19 visits by Bridge Reps.

3rd. Breaking Federal Navigation Laws by lowering bridge clearance and then paying businesses upstream for being unable to transport manufactured goods. Last time OREGON was going to pay a WASHINGTON businesses 48 million for being unable to ship an oil rig to Alaska. Never mind they hadn't built one in a period of years and still haven't. OREGON TAX PAYERS WAKE UP !!!

4th. There needs to be a more in depth investigation of the feasibility of a tunnel by an independent source.

5th. If the really "Big One" Quake is rated 2500 why will this bridge only support a 500 shake? What do these numbers mean and equate to?

6th. By their own admission this bridge will only last 100 years. What then will be done with all that concrete ??? We will be leaving our decendents a huge ecological and no doubt financial mess/burden.

IBR Draft SEIS - RECORD #3464 DETAIL

First Name :	Nancy
Last Name :	Harrison
Attachments :	DSEIS-3464_harrison_original.pdf (4 kb)

IBR Draft SEIS - RECORD #3464 DETAIL

Submission Date :	11/18/2024
First Name :	Nancy
Last Name :	Harrison
Business/Organization/Agency :	First Unitarian Community for EArth

Submission Input :

First Name:
Nancy

Last Name:
Harrison

Business or Organization:
First Unitarian Community for EArth

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
I am writing to express my deep concern about the current Draft Environmental Impact Statement (DEIS) of the $7.5 Billion Interstate Bridge Replacement. project. instead of proposing a cost-effective direct replacement of the existing bridge, ODOT and WSDOT are proposing a massive, $7+ billion, five mile highway expansion. It appears, after carefully evaluating the DEIS, that ODOT and WSDOT are using wildly inaccurate numbers for their traffic projections.

The area deserves a straightforward, cost-effective seismically reinforced bridge, not an overpriced, expanded one that will result in higher pollution. Please push back on this DEIS and insist on more reliable numbers from ODOT and WSDOT.

Thank you,
Nancy Harrison
[redacted]

IBR Draft SEIS - RECORD #3467 DETAIL

First Name :	Barbara
Last Name :	Kerr G. Clifford
Attachments :	DSEIS-3467_kerr_original.pdf (4 kb)

IBR Draft SEIS - RECORD #3467 DETAIL

Submission Date :	11/19/2024
First Name :	Barbara
Last Name :	Kerr G. Clifford
Business/Organization/Agency :	
Attachments :	Interstate Bridge Replacement.pdf (36 kb)

Submission Input :

Draft SEIS public comment

Barbara Kerr
[redacted]

Both as a resident of Portland and as a resident of the affected neighborhood, I have the following concerns about the Interstate Bridge Replacement project:

One - The design of the Interstate Bridge Replacement needs to reflect the input of the public. Its beauty needs to be a testament to the people and their values. Safety first. If we must build a new bridge, it needs to be as safe and durable as possible. A bridge built for safety and durability can be elegant and beautiful in its simplicity. It can say to those who enter our states that we value the wellbeing of people more than a monument to the designers and the political powers. Adopting a more expensive design just for aesthetics will say we are people who care more about “showing off” than taking care of people’s lives. It will reflect negatively on us for decades to come. We have so many better and urgent ways to spend money.

Two - As has been pointed out by others, the Interstate Bridge Replacement proposed design has a glaring mistake in that the paths for walking and biking are not easily accessible to the location of the light rail. Alternate forms of transportation should be the first consideration in the design. If the bridge is to meet the needs of the future, it must take into account that there will be fewer car trips and that freight will move toward train travel. To value car/truck travel higher than coordinating walking/biking and light rail is to build in planned obsolescence.

Three - As a publicly funded project, the IBR has a responsibility to the taxpayers to coordinate with other transportation projects in the same area or adjacent to it to maximize the public benefits and minimize the expense. Specifically, the 40-mile Loop should be incorporated into the IBR without barriers, crossings, or interruptions, and the IBR project should extend to connect to the 40-mile Loop. In doing so, IBR must coordinate also with the work on the levy being done by the U.S. Army Corps of Engineers.

Four - The local neighborhood stands to be greatly affected by the IBR and the changes to the streets that feed it. IBR would be grossly negligent if coordination with Portland Bureau of Transportation and the citizens are not highly integral in the design and planning. Decisions made now will affect the community for decades to come and corrections will not be easily made or funded. It is fiscally irresponsible for the IBR to not address these concerns. Of immediate issue is the truck traffic on Marine Drive East, which is a neighborhood street and runs on the levy. The design must direct truck traffic to Columbia Boulevard instead.

IBR Draft SEIS - RECORD #3468 DETAIL

First Name :	Susan
Last Name :	Johnston-Wright
Attachments :	DSEIS-3468_JohnstonWright_Original.pdf (194 kb)

IBR Draft SEIS - RECORD #3468 DETAIL

Submission Date :	11/19/2024
First Name :	Susan
Last Name :	Johnston-Wright
Business/Organization/Agency :	
Attachments :	Separating Freight & Bike Travel.pdf (829 kb)

Submission Input :

Susan Johnston-Wright

Realtor, CRS, GRI
Licensed in Oregon, [redacted]
Oregon Buyer Advisory, for your review:

https://oregonrealtors.org/wp-content/uploads/2021/01/Oregon-Property-Buyer-Advisory_2020.pdf

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

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Separating Freight and Bike Travel
on the Marine Drive Interchange and On-Ramps

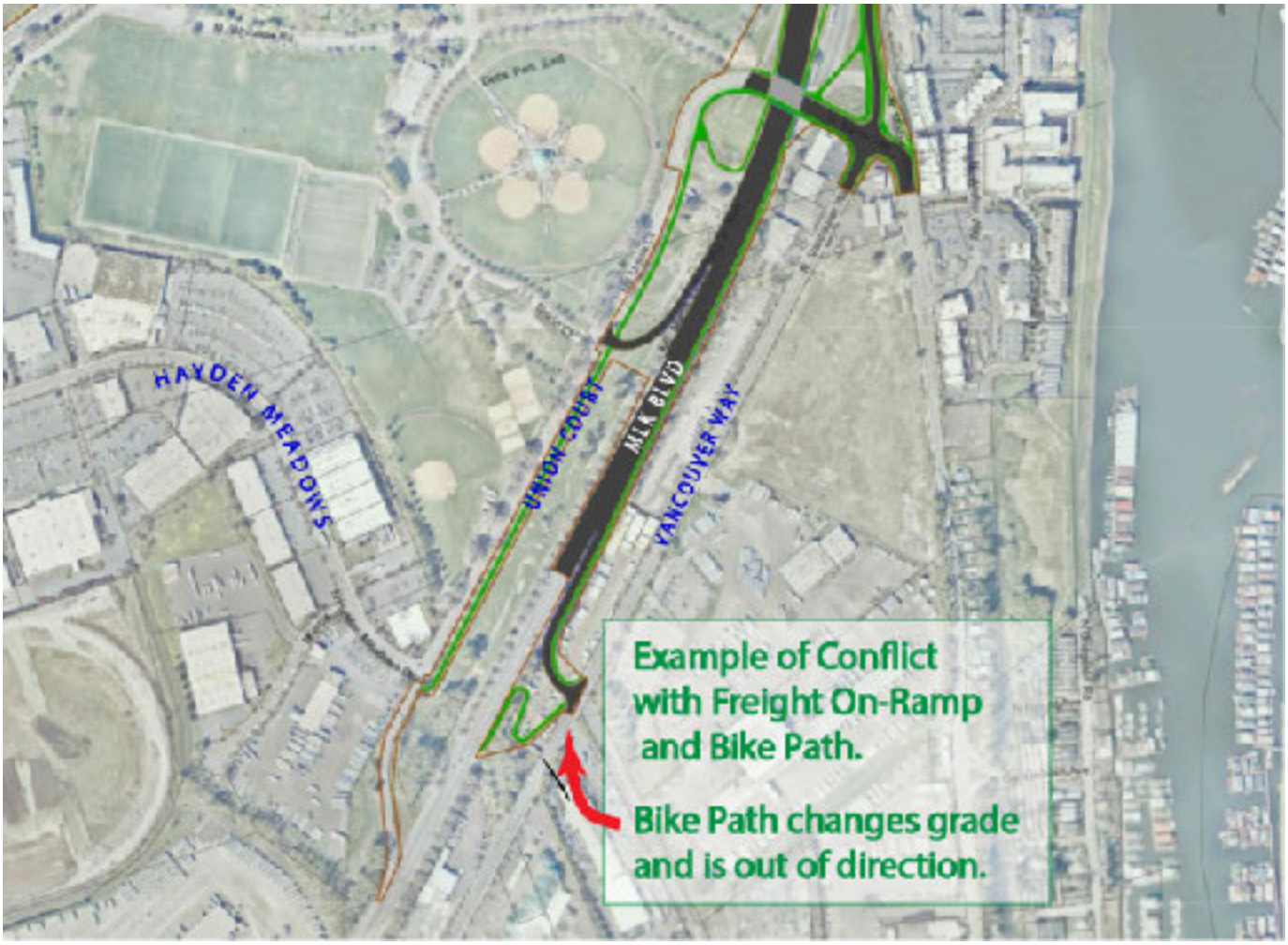
One important purpose and need of the IBR is to (c) improve highway freight mobility and address interstate travel and commerce needs in the Program area.

Another important purpose and need is to (b) improve connectivity, reliability, travel times, and operations of public transportation modal alternatives in the Program area.

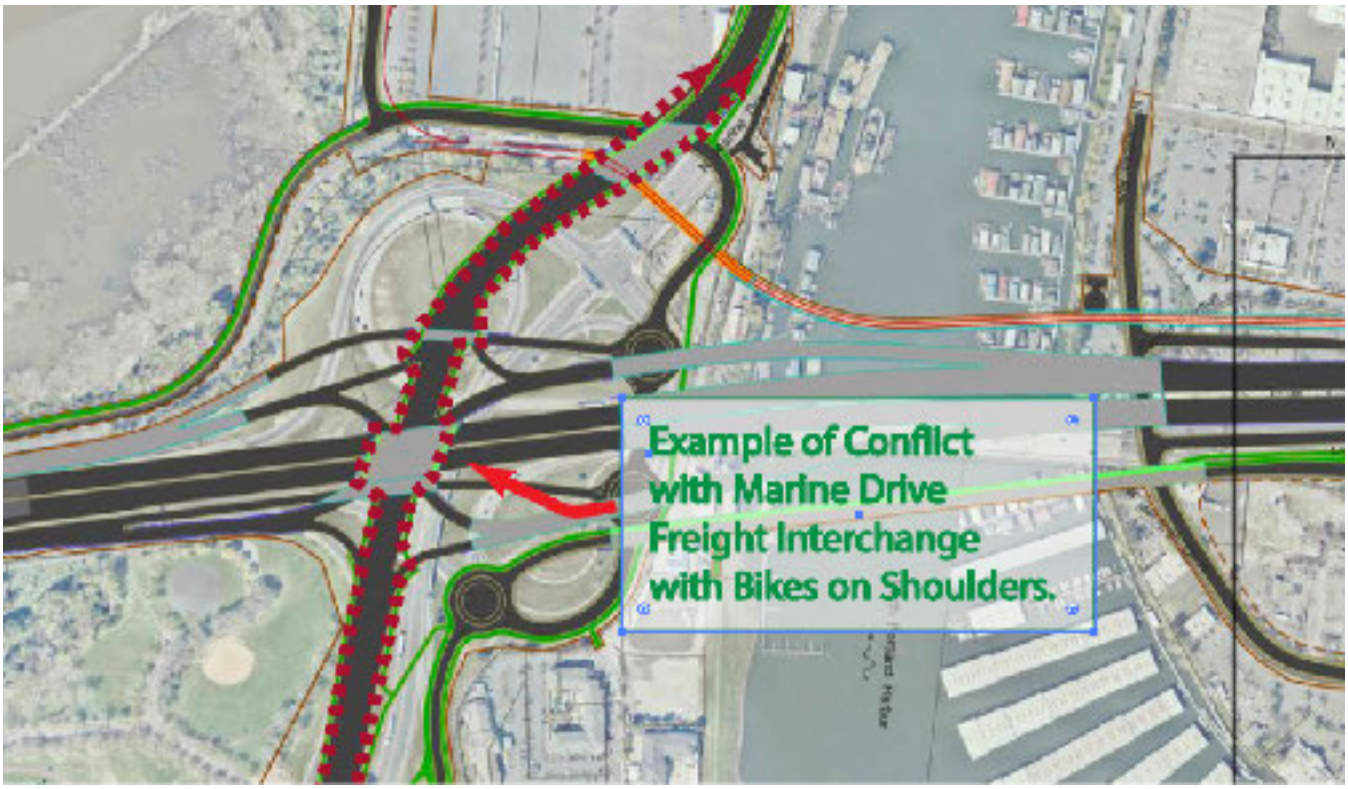
A way to meet the purpose and needs of both Freight Users and Active Transportation Users is to build active transportation routes physically separated from Freight routes as much as possible. Maximizing this separation is key to creating efficient Freight routes while creating safer, more attractive, 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

Susan Johnston-Wright

IBR Draft SEIS - RECORD #3470 DETAIL

First Name :	Farleigh
Last Name :	Winters
Attachments :	DSEIS-3470_Winters_Original.pdf (184 kb)

IBR Draft SEIS - RECORD #3470 DETAIL

Submission Date :	11/19/2024
First Name :	Farleigh
Last Name :	Winters
Business/Organization/Agency :	LSW Architects
Attachments :	IBR DSEIS_Comments_FW_2024 11 18.pdf (194 kb)

Submission Input :

Hello - Attached is a letter with comments on the Draft SEIS. Please confirm receipt of this message.

Thank you!

Farleigh Winters AIA
Associate Principal | Director of Sustainability (She/her)
Kolbe(tm) 8-7-3-3 | PRINT(r) 1-7

LSW Architects
610 Esther Street, Suite 200
Vancouver, WA 98660

O: 360 694 8571

LSWARCHITECTS.COM<http://www.lswarchitects.com/>

We are thrilled to announce that LSW has been certified by the Washington State Office of Minority and Women's Business Enterprises (OMWBE) as a Minority/Women Business Enterprise (MWBE) and a Disadvantaged Business Enterprise (DBE). This recognition signifies our ongoing effort to evolve into a community of design leaders whose expertise, passion, unique abilities, and lived experiences elevate our work and impact.

Comments on the IBR DSEIS

November 18, 2024

Submitted by Farleigh Winters

Individual and Collective Feedback:

- **Is it feasible to separate bike and pedestrian traffic from vehicular traffic crossing the new bridge, and provide a lower bridge that is water level?** The elevation of the new bridge route poses significant challenges to bikers and pedestrians as they have to climb up the bridge and then use an isolated trail that leaves them vulnerable (crime, weather, bridge edge/drop). Bikes and pedestrian can tolerate bridge lifts in ways that vehicular traffic cannot. The experience of biking or walking along the waters edge is much more pleasant than being 100ft in the air. I am concerned that the elevated route will feel unsafe for a variety of reasons:
    - The route won't have enough passive observation – a walker or cyclist it will feel unsafe to use this route in times when it isn't populated. If something bad were to happen it feels like you will be alone without other who are able to see you or assist you.
    - The height of route will be a suicide risk or a danger for those moving close to the bridge edge.
- **Pearson airport and PDX create limitations on bridge height. Has IBR considered an asymmetric suspension or cable-stayed bridge option that avoids height limitations and allows for a more sculptural bridge form?** The new bridge needs to be gracefully iconic – a utilitarian bridge will be seen as a failure even if it succeeds in reducing congestion. The new bridge will shape the experience of the Columbia River and neighboring cities, and be a landmark for the next 100 years. If Pearson Airfield cannot be decommissioned to open up air space for the new bridge, then can the bridge design use the air space that is available to create an iconic span.
- **On the Vancouver side of the river, what is being planned and programmed to happen under the on ramps and bridge?** Numerous cities have this condition, and it often turns into a dead zone, where nefarious things happen, creating an unsafe area that people avoid. This is not what we want for Vancouver's downtown and Waterfront. What does the City and IBR plan to do with this space so it doesn't have a negative impact to Downtown Vancouver?
- **Arnada neighbors are very concerned about the installation of the sound wall along the I-5 corridor and how it will impact the neighborhood**. Please plant trees and encourage the preservation of mature trees to mitigate sound and air quality issues stemming from the Interstate. If measures can be taken to improve the acoustics of I-5 in the neighborhood, from today's baseline, that would be greatly appreciated by neighbors.
- **Concerns for bike/pedestrian routes:**
    - Length of route for pedestrians/bikes/etc –The proposed helix requires additional travel distance that will discourage use. Out of direction travel is detrimental to bike and pedestrian use and can create wayfinding issues for people with diverse abilities. Elevated pedestrian and bike paths are more successful when there are waypoints along the route that create an active attraction or reason for taking the route. A helix shape is relatively efficient for distance, but doesn't encourage use unless people are solely trying

to move vertically through space. A better solution would be to include multiple ramps that parallel natural ped/bike routes through the project area and connect these the bridge route. Also consider the shape of the ramp, and if a continuous helix makes more sense than a different shape, perhaps a paperclip or switch back would be easier to navigate and could integrate better with stairs. Forms found in nature often provide better solutions. Attached are image of some example multi-use pathways.
    - Steepness of route for pedestrians/bikes/etc –The height of the bridge for the desired boat clearance requires excessive height for pedestrians and bikes. Steep, long ramps and stairs limit access to the crossing.
    - Isolation and height of pedestrian route on bridge – Having eyes on the multi-modal path is critical. If the path feels like an isolated chute, it won't feel safe. Putting the pedestrian/bike route up at the bridge deck, separate from vehicular traffic, means that travelers will be high off the ground, isolated to a single pathway, and won't have options for increased visibility or alternate routes. Secondary to sight lines and visibility, lighting plays a critical role in safety.
    - Reliance on an elevator – elevators present safety concerns and require long-term maintenance. If the elevator isn't working, it will prevent travelers from using the bridge in the moment and discourage future use. Elevators also feel unsafe because they are isolated areas where bad things can happen. If I am travelling alone at night, on foot or bicycle, I would typically avoid an elevator in favor of a well-lit ramp or stair.
    - Separation of different types of mobility – cyclist and pedestrians need separate walking paths to avoid injury. If a walker has a dog on a leash, this poses a threat to cyclists who can't predict where the dog might move. Pedestrians often feel threatened by cyclists whizzing past at high speeds, especially with scooters and e-bikes sharing the trail. There is concern that the 10ft path proposed will not be wide enough to safely support bikes, pedestrians, and other wheel modes of pedestrian transportation.
- **The new bridge and IBR program should be a celebration of our region, not just a utilitarian transportation utility**. The hope is that the new I-5 bridge is more than just a way to move traffic from Point A to Point B, but also a place for enjoyment, where people want to linger, observe their surroundings, and have a sense of discovery. The community wants a bridge that celebrates the river, and natural amenities of the area, rather than just passing over it. Please consider view points and promenades that point to the mountains, river features, and landmarks of historic and cultural significance. The current imagery of the bridge options are uninspiring and I am concerned that leaving the sculptural design of the bridge to the end of design will result in a suboptimal solution. Please consider how the bridge will look from:
    - The Vancouver waterfront
    - Fort Vancouver
    - Overhead (flights to/from PDX)
    - Up river and down river
    - Jantzen Beach/Hayden Island
    - I-5 approaches from both sides of the river
- **The IBR project area is connected to a larger transit network and connectivity between trails and loops is essential**. Consider the two-bridge loop bike trail, and how cyclists would travel from 205 to I-5 in a single trip. Consider the downtown Vancouver pedestrian loop through Fort

Vancouver, the waterfront, and downtown. This is a popular lunch time walk for downtown Vancouver workers, visitors, and residents.

- **Has IBR contacted Amtrak and considered the train as an alternate mode of transportation to support commuters during and after bridge construction?** Amtrak is currently underutilized and yet it provides a safe, clean, and efficient mode of transportation that isn't affected by interstate traffic. Current train departures don't support reliable commuting however with minor modification, the existing train route could significantly alleviate traffic stress. Southbound routes from Vancouver to Portland take 26 minutes, Northbound routes from Portland to Vancouver take 16 minutes. The earliest departure time to commute into Portland isn't until 10:11am and evening departure times are limited. It seems that working with existing infrastructure and increasing train departure options could greatly benefit commuters. The Amtrak station in Vancouver is a 15 minute walk from Esther Short Park and could be greatly shortened with new pedestrian infrastructure from the Vancouver Waterfront or 8th street. Union Station is centrally located on the west side of downtown Portland and provides efficient pedestrian, biking, and bus connections to businesses downtown. I encourage IBR to explore options for integrating Amtrak and rail lines into the project.
- **There is a lot of community discussion about tolling and I am curious what strategies are being implemented to lessen the burden on low-income travelers.**
    - Will bussing and other mass transit options be significantly more affordable than the toll?
- The overall bridge width is a concern, and I am not convinced that the double decker option will work well for pedestrians and cyclists, which pushes my preference towards the single deck span. For vehicular traffic, different schemes show 4-5 travel lanes for cars as well as safety shoulders. With the proposed auxiliary lanes, that are intended to ease merging traffic and short trips, **do we really need (3) through lanes, or can we reduce to (2) through lanes?** With goals around de-carbonization, can one of these through lanes be used as an express (for cars with 2 or more occupants) or bus lane? Have any cities implemented a "freight lane" or combination "freight lane" and "bus lane" that is dedicated for larger vehicles carrying goods or lots of people.
- **It will be very helpful to include or modify the visualizations in the DSEIS to include key features that will help the public understand what is being proposed**. Please consider adding these in the Final SEIS or sooner, so that we can provide more informed input.
    - 2-34 Figure 2-22. Bridge Configuration Profile Comparison - including scale buildings for both waterfrontages will help people understand the scale of the bridge. I am concerned that we don't realize just how tall this bridge will be and that the experience of looking at Mt Hood from the Vancouver Waterfront will mean looking under the bridge, rather than through it. This comment applies to other diagrams in the DSEIS that are meant to communicate bridge height. Context is important for reviewing the height of the structure.
    - 2-26 Figure 2-16 Cross Section of the Double Deck Fixed Span Configuration – including the height of the river (or range of heights) in all the bridge cross section diagrams would be helpful for understanding what the height of the bridge will be and how much distance there is between the active transportation path and the river. I am concerned

that the height will feel scary and unsafe and the diagrams don't show the full picture of what that experience will be.

- Existing buildings are missing in key diagrams:
  - Figure 4-33: missing new apartment buildings
  - Figure 4-34: missing new apartment building on Washington and 6th as well as the Hudson building
  - Figure 4-39: missing Aderra Apartments and the Hurley building
- Providing a visualization of the active transportation pathway will be helpful. It doesn't seem like this route is getting the same level of graphic communication as the vehicular route. I would love to see a video showing what the experience along this route will be, similar to what is on the IBR website for I-5 vehicular traffic.

Thank you for your consideration. The Draft SEIS is a deep and comprehensive study on bridge options and impacts, and I have great appreciate for the IBR team.

Kindly,



Farleigh Winters, AIA

Arnada Resident, CBAG member

IBR Draft SEIS - RECORD #3471 DETAIL

First Name :	Shane
Last Name :	Stricker
Attachments :	DSEIS-3471_Stricker_original.pdf (39 kb)

IBR Draft SEIS - RECORD #3471 DETAIL

Submission Date : 11/18/2024
First Name : Shane
Last Name : Stricker
Business/Organization/Agency :

Submission Input :

First Name:
Shane

Last Name:
Stricker

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
I'm glad to see plans to include transit and bike lanes, but since this is a project that will solidify our choices for decades, I think it would be smarter to reduce the number of car lanes.

IBR Draft SEIS - RECORD #3472 DETAIL

First Name :	Leslie
Last Name :	Sawyer
Attachments :	DSEIS-3472_sawyer_original.pdf (3 kb)

IBR Draft SEIS - RECORD #3472 DETAIL

Submission Date : 11/19/2024
First Name : Leslie
Last Name : Sawyer
Business/Organization/Agency :

Submission Input :

[redacted]

I want an aesthetically pleasing bridge, that considers the issues of freight traffic that does not conflict with bike traffic and gives good access to light rail even when you are walking or riding a bicycle.

Sincerely
Leslie Sawyer

IBR Draft SEIS - RECORD #3473 DETAIL

First Name :	Susan
Last Name :	Johnston-Wright
Attachments :	DSEIS-3473_JohnstonWright_Original.pdf (208 kb)

IBR Draft SEIS - RECORD #3473 DETAIL

Submission Date :	11/19/2024
First Name :	Susan
Last Name :	Johnston-Wright
Business/Organization/Agency :	
Attachments :	MLK Undercrossing.pdf (832 kb)

Submission Input :

Susan Johnston-Wright

Realtor, CRS, GRI
Licensed in Oregon, [redacted]
Oregon Buyer Advisory, for your review:

https://oregonrealtors.org/wp-content/uploads/2021/01/Oregon-Property-Buyer-Advisory_2020.pdf

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

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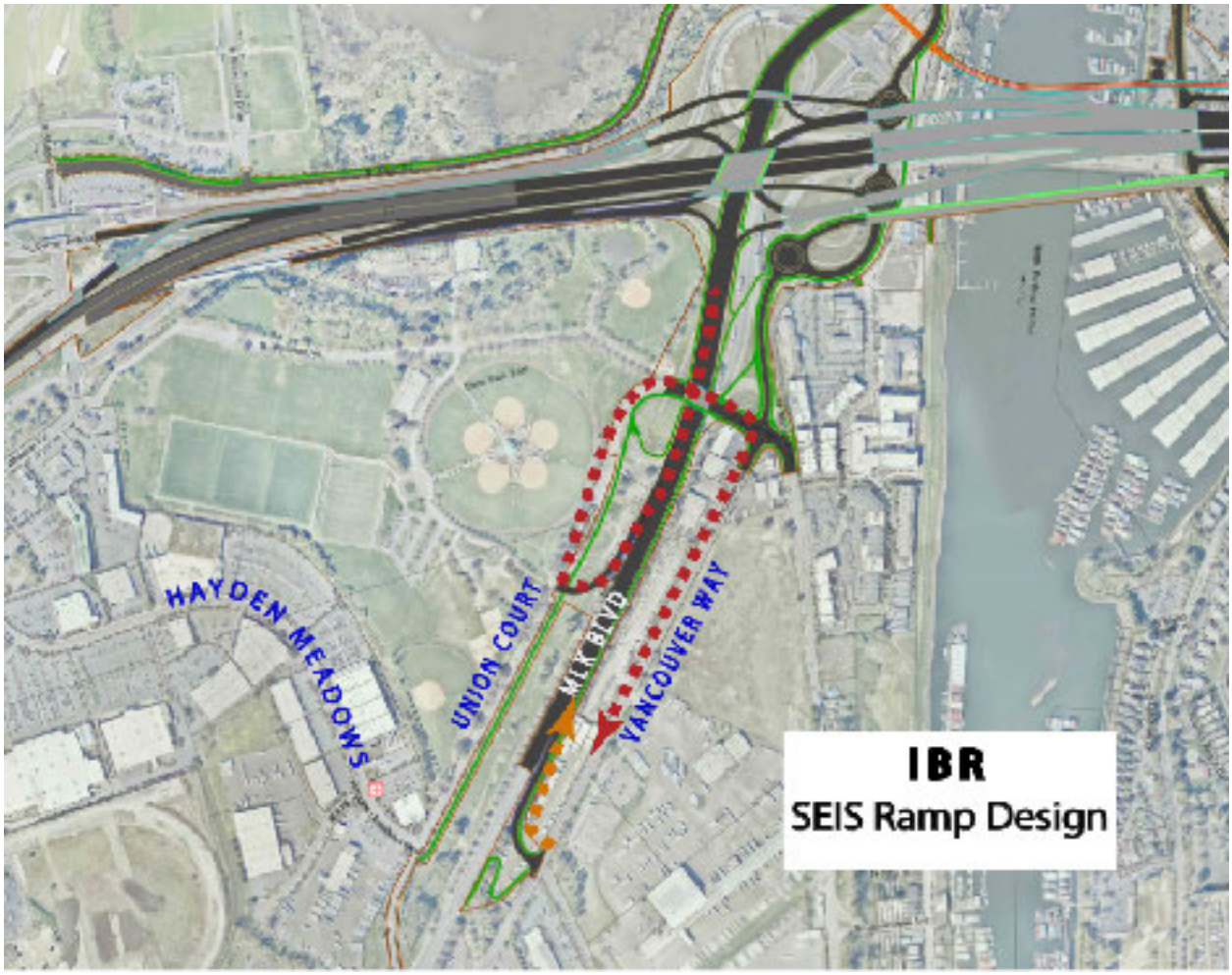
The MLK Undercrossing and Complete Interchange
Better Freight & Neighborhood Access Ramps for the IBR

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

Susan Johnston-Wright

IBR Draft SEIS - RECORD #3474 DETAIL

First Name :	Susan
Last Name :	Johnston-Wright
Attachments :	DSEIS-3474_JohnstonWright_Original.pdf (93 kb)

IBR Draft SEIS - RECORD #3474 DETAIL

Submission Date :	11/19/2024
First Name :	Susan
Last Name :	Johnston-Wright
Business/Organization/Agency :	
Attachments :	Synergies Empowered by the IBR.pdf (267 kb)

Submission Input :

Susan Johnston-Wright

Realtor, CRS, GRI
Licensed in Oregon, 990600102
Oregon Buyer Advisory, for your review:

https://oregonrealtors.org/wp-content/uploads/2021/01/Oregon-Property-Buyer-Advisory_2020.pdf

[redacted]

[redacted]

[redacted]

[redacted]

[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

Susan Johnston-Wright

IBR Draft SEIS - RECORD #3475 DETAIL

First Name :	Susan
Last Name :	Johnston-Wright
Attachments :	DSEIS-3475_JohnstonWright_Original.pdf (139 kb)

IBR Draft SEIS - RECORD #3475 DETAIL

Submission Date :	11/19/2024
First Name :	Susan
Last Name :	Johnston-Wright
Business/Organization/Agency :	
Attachments :	Marine Drive Bike Lanes.pdf (525 kb)

Submission Input :

Susan Johnston-Wright

Realtor, CRS, GRI
Licensed in Oregon, [redacted]
Oregon Buyer Advisory, for your review:

https://oregonrealtors.org/wp-content/uploads/2021/01/Oregon-Property-Buyer-Advisory_2020.pdf

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

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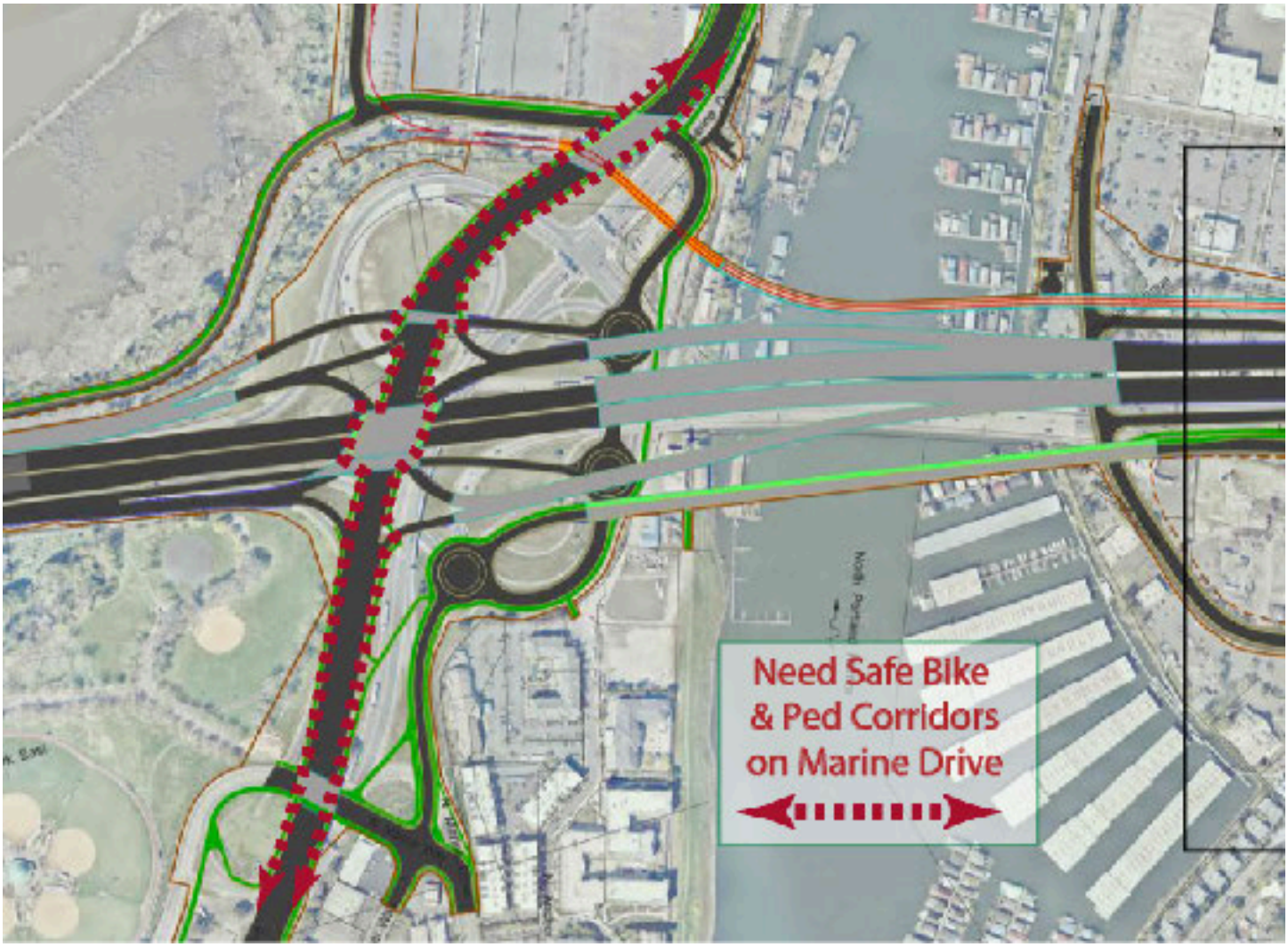
Comments on Freight and Bike conflicts on the Marine Drive Single Point Interchange

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
Susan Johnston-Wright

IBR Draft SEIS - RECORD #3476 DETAIL

First Name :	Harlan
Last Name :	Shober
Attachments :	DSEIS3476_harlan_original.pdf (6 kb)

IBR Draft SEIS - RECORD #3476 DETAIL

Submission Date : 11/18/2024
First Name : Harlan
Last Name : Shober
Business/Organization/Agency :

Submission Input :

First Name:
Harlan

Last Name:
Shober

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Induced Demand

Comment:
If we mean to cut back on GHG emissions, we need to plan for decreased reliance on personal vehicles and increased public transportation. Attempts to alleviate congestion by expanding roadways often — if not always — quickly results in an increase in traffic and the restoration of congestion. Current plans for IBR favor what has become an obsolete model for moving people and goods. Something as expensive and long-term as a new bridge over the Columbia should be informed by a new transportation paradigm. We have to stop treating bus lanes, rail lines, bike paths and pedestrian walkways as token add-ones to the main business of subsidizing personal vehicle use. Public transportation should be primary. Designing and building to this standard might even prove to be less expensive.

IBR Draft SEIS - RECORD #3478 DETAIL

First Name :	Susan
Last Name :	Johnston-Wright
Attachments :	DSEIS-3478_JohnstonWright_Original.pdf (123 kb)

IBR Draft SEIS - RECORD #3478 DETAIL

Submission Date :	11/19/2024
First Name :	Susan
Last Name :	Johnston-Wright
Business/Organization/Agency :	
Attachments :	Comments Bridge Architecture 2.pdf (121 kb)

Submission Input :

Susan Johnston-Wright

Realtor, CRS, GRI
Licensed in Oregon, [redacted]
Oregon Buyer Advisory, for your review:

https://oregonrealtors.org/wp-content/uploads/2021/01/Oregon-Property-Buyer-Advisory_2020.pdf

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

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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

Susan Johnston-Wright

IBR Draft SEIS - RECORD #3479 DETAIL

First Name :	Elias
Last Name :	Baldwin
Attachments :	DSEIS-3479_baldwin_original.pdf (7 kb)

IBR Draft SEIS - RECORD #3479 DETAIL

Submission Date : 11/18/2024
First Name : Elias
Last Name : Baldwin
Business/Organization/Agency :

Submission Input :

First Name:
Elias

Last Name:
Baldwin

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Climate Change

Comment:
I feel strongly that any expansion of our highway system needs to strongly consider the long-term climate impacts. The modeling in the environmental impact report seems to willfully ignore the reality of induced traffic demand which will almost certainly increase vehicle miles traveled and thus result in even more pollution and emissions. I think the bridge should be kept a reasonable size, with the saved money from not expanding it used in more productive ways to fund better mass transit and ped/bike connectivity.

IBR Draft SEIS - RECORD #3482 DETAIL

First Name :	Susan
Last Name :	Johnston-Wright
Attachments :	DSEIS-3482_JohnstonWright_Original.pdf (104 kb)

IBR Draft SEIS - RECORD #3482 DETAIL

Submission Date :	11/19/2024
First Name :	Susan
Last Name :	Johnston-Wright
Business/Organization/Agency :	
Attachments :	West Side Mulituse Path.pdf (250 kb)

Submission Input :

Susan Johnston-Wright

Realtor, CRS, GRI
Licensed in Oregon, [redacted]
Oregon Buyer Advisory, for your review:

https://oregonrealtors.org/wp-content/uploads/2021/01/Oregon-Property-Buyer-Advisory_2020.pdf

[redacted]

[redacted]

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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,
Susan Johnston-Wright

IBR Draft SEIS - RECORD #3483 DETAIL

First Name :	Susan
Last Name :	Johnston-Wright
Attachments :	DSEIS-3483_JohnstonWright_Original.pdf (158 kb)

IBR Draft SEIS - RECORD #3483 DETAIL

Submission Date :	11/19/2024
First Name :	Susan
Last Name :	Johnston-Wright
Business/Organization/Agency :	
Attachments :	The 40 Mile Loop Connections.pdf (590 kb)

Submission Input :

Susan Johnston-Wright

Realtor, CRS, GRI
Licensed in Oregon, [redacted]
Oregon Buyer Advisory, for your review:

https://oregonrealtors.org/wp-content/uploads/2021/01/Oregon-Property-Buyer-Advisory_2020.pdf

[redacted]

[redacted]

[redacted]

[redacted]

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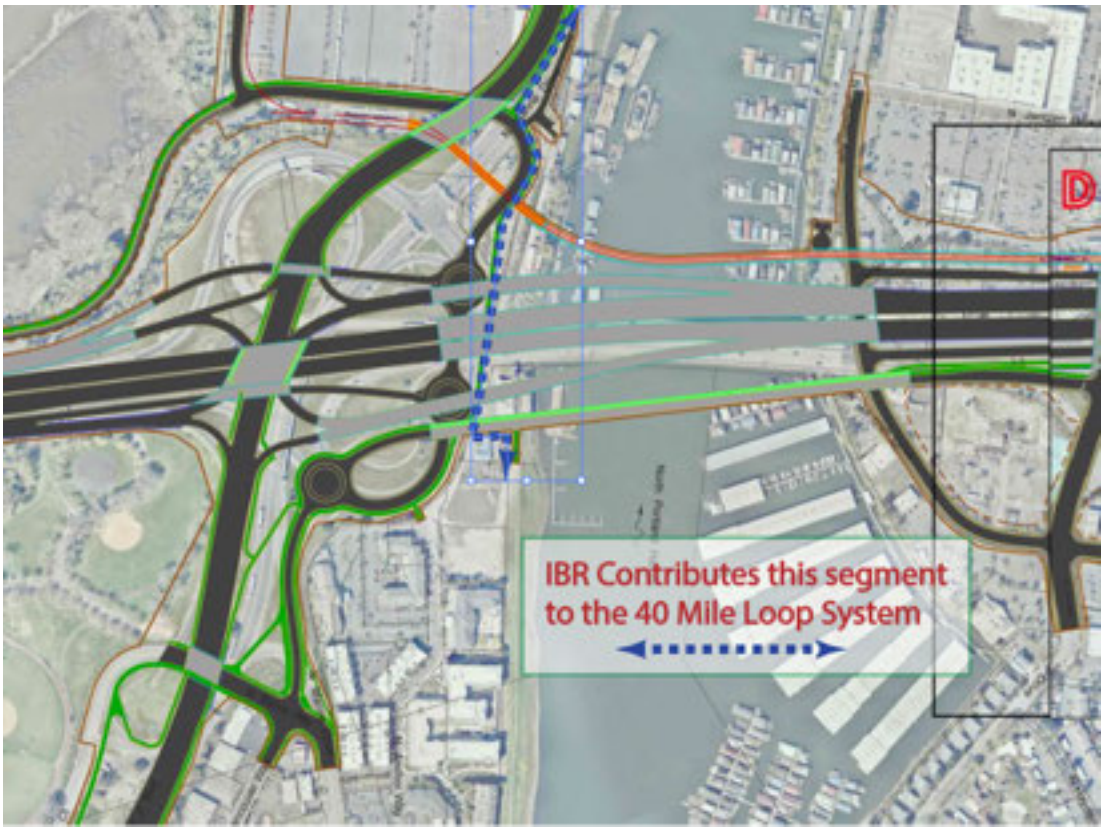
Comments on IBR Multi-Use path connections to the 40-Mile Loop East/West Corridor

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.

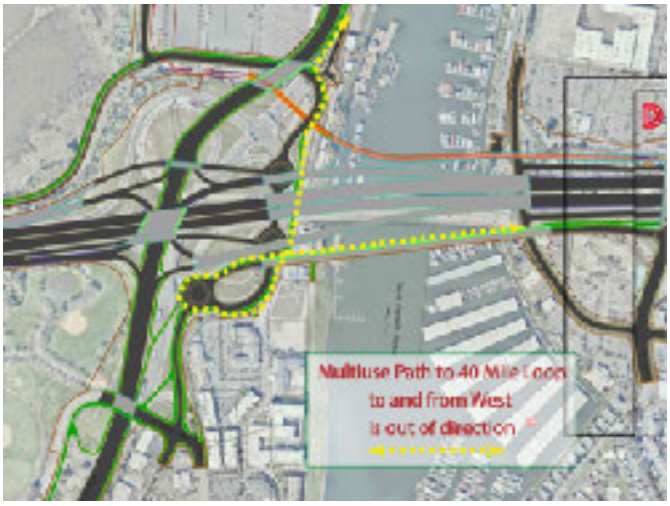
IBR Positive Contributions to the 40-Mile Loop Trail

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

Susan Johnston0-Wright

IBR Draft SEIS - RECORD #3484 DETAIL

First Name :	Edward
Last Name :	Plumb
Attachments :	DSEIS-3484_Plumb_original.pdf (38 kb)

IBR Draft SEIS - RECORD #3484 DETAIL

Submission Date : 11/18/2024
First Name : Edward
Last Name : Plumb
Business/Organization/Agency :

Submission Input :

First Name:
Edward

Last Name:
Plumb

Business or Organization:
None

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
My concern is that the second auxiliary lane is not justified by the observed traffic data. Taking into account the

national and local trends, including among others, the rise in telework after the pandemic, decreasing drivership among Gen Z, the relatively stagnant population growth of the Portland metro area, the housing crisis of the Portland metro area, and the long term decline of truck traffic on I-5. It seems that the project's long shelf life, going back to the Columbia River crossing, has caused an inability to face facts about traffic growth. Why was a 1% traffic growth rate assumed when it cannot be supported by the data? I have followed the many blog posts of City Observatory on this particular issue and feel that engineering judgement has been clouded by those too close to the project for too long, with im sure many relevant political pressures beyond my knowledge making things more diffficult. Portland was at some point ten years ago considered among the vanguard of urban transportation reform, and the IBR project backslides on this, conceding the usual highway capacity expansion, in clear conflict with the Regional Transportation Plan which commits to lowering VMT by 12% over the next 25 years. How does modeled traffic growth in excess of 12% in the same period concord? Why is a less accurate and less sophisticated traffic model being used? Why is the FHWA on board with this project when they don't see themselves as supporting highway expansion before capacity improvements? How much will the light rail and bike lanes reduce traffic demand in the bridge? I understand the urbanist Blboogeyman of "induced demand" only captures part of the reality and engenders a certain ideology and point of view; but I wager that the transportation planners and engineers involved in the IBR project are no less victims of the professions, and state DOTs ideology; one in which capacity improvements need to be given a "factor of safety" to account the status of traffic modelling as an imperfect art. An article published in Dissent magazine last month has identified this pattern nationally, and the IBR is falling into the same trap; a project with an exaggerated scope that will never see the traffic it is projected to service. But there is no factor of safety in capacity analysis or economic analysis; the Monte Carlo simulations and sensitivity analysis conducted just two years ago gave a range of 4.5-7 billion. Now we are beyond that range, (what were the odds of a project cost falling outside of the distribution as developed?) and every tax payer following the project assumes we'll be to 9 billion in another two years. Right-size the project like the year is 2024, and Portland is set to retake its lead in America transportation

IBR Draft SEIS - RECORD #3487 DETAIL

First Name :	Jill
Last Name :	Karner
Attachments :	DSEIS-03487_Karner_original.pdf (3 kb)

IBR Draft SEIS - RECORD #3487 DETAIL

Submission Date : 11/18/2024
First Name : Jill
Last Name : Karner
Business/Organization/Agency :

Submission Input :

First Name:
Jill

Last Name:
Karner

Email:
[redacted]

City:
Portland

US States:
OR

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.

IBR Draft SEIS - RECORD #3488 DETAIL

First Name :	Stasia
Last Name :	Honnold
Attachments :	DSEIS-3488_Honnold_original.pdf (4 kb)

IBR Draft SEIS - RECORD #3488 DETAIL

Submission Date :	11/18/2024
First Name :	Stasia
Last Name :	Honnold
Business/Organization/Agency :	JCA

Submission Input :

First Name:
Stasia

Last Name:
Honnold

[redacted]

[redacted]

[redacted]

Topic Area:
Transportation

Comment:
I live in Portland and commute via bicycle to Vancouver for work. I have serious concerns about active transportation options outlined on the current bridge design.
1. Having to travel an extra mile just to get over a bridge is ridiculous. One mile might not seem like that much if you're driving it, but this increases my own personal commute, which is already rather long, by nearly 10%, or increases that of my colleague by almost 25%. We need to be making active transport seem like a feasible option, and unnecessarily adding length (which, remember, takes physical effort to achieve when you're not just pushing a gas pedal in your car) is poor design.
2. I'm concerned that this design makes an already not great active transportation route worse, with the potential interactions between active transport and freight traffic to get onto the bridge on the Oregon side, and no great access to the Vancouver waterfront as it currently exists on the Washington side.
3. Relying on elevators to get folks up and down to the bridge feels like a poor decision, especially given that in my experience elevators like on the Bob Stacy overpass are frequently out of service.
4. It seems to me that putting transit options close to active transport options makes a lot more sense than

separating them, since people frequently combine transit with biking or walking, especially for longer commutes like I imagine many are to cross the river. Adding another barrier to access transit from walking or biking is an oversight.

Overall, it strikes me that this was designed not by folks who actually walk or roll or take transit over this bridge and I'm a little disappointed that it feels like transit and active transportation options were sort of added on "as possible" to a large project that actually had no desire to make walking, biking, or taking transit more appealing.

IBR Draft SEIS - RECORD #3490 DETAIL

First Name :	Atticus
Last Name :	Van Parys
Attachments :	DSEIS_3490_Parys_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #3490 DETAIL

Submission Date : 11/18/2024
First Name : Atticus
Last Name : Van Parys
Business/Organization/Agency :

Submission Input :

First Name:
Atticus

Last Name:
Van Parys

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Neighborhoods and Equity

Comment:
I support the positions outlined by No More Freeways.

This bridge should not expand freeways through my neighborhood, it will pollute our air and increase noise. I'd prefer the tunnel option, and keeping the planned lanes to 3 in each direction. Use the excess fund to c reconnect the neighborhoods divided by the initial construction of the freeway.

This project cannot not be allowed to continue in its present plan.

JCA comment #: 844

IBR Draft SEIS - RECORD #3493 DETAIL

First Name :	Joshua
Last Name :	Berger
Attachments :	DSEIS_3493_Berger_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #3493 DETAIL

Submission Date : 11/18/2024
First Name : Joshua
Last Name : Berger
Business/Organization/Agency :

Submission Input :

First Name:
Joshua

Last Name:
Berger

Business or Organization:
plazm media inc

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
Please right-size & make this project more health-conscious.

We all know that increased traffic under any scenario poses serious health risks and exacerbates negative outcomes for priority communities. 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. Please do this for the benefit of all.

Prioritizing a streamlined project focused on bridge replacement, transit enhancements, and active transportation—without extensive freeway expansion—would be more beneficial and cost-effective. The DSEIS does not provide sufficient justification for a second auxiliary lane.

Thank you for your consideration.

Josh

JCA comment #: 849

IBR Draft SEIS - RECORD #3495 DETAIL

First Name :	John
Last Name :	Giacoppe
Attachments :	DSEIS_3495_Giacoppe_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #3495 DETAIL

Submission Date : 11/18/2024
First Name : John
Last Name : Giacoppe
Business/Organization/Agency :

Submission Input :

First Name:
John

Last Name:
Giacoppe

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Climate Change

Comment:
The multi-use path needs to be shaded to protect users. The DSEIS acknowledges that we expect temperatures on the bridge to regularly exceed 100F in the future. For users to avoid heat exhaustion or heatstroke, some sort of cover is necessary. Preferably, the cover should extend for the duration of the path. Planting saplings to achieve this would also help with air quality impacts on the bridge.

JCA comment #: 854

IBR Draft SEIS - RECORD #3500 DETAIL

First Name :	Kyle
Last Name :	Herrlinger
Attachments :	DSEIS_3500_Herrlinger_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #3500 DETAIL

Submission Date : 11/18/2024
First Name : Kyle
Last Name : Herrlinger
Business/Organization/Agency :

Submission Input :

First Name:
Kyle

Last Name:
Herrlinger

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Cumulative Effects

Comment:
The SDEIS lacks information about how adding additional auxiliary lanes will create induced demand. Drivers will treat auxiliary lanes as lanes of travel even if that is not what they are intended for. Design plan also shows these two new “auxiliary lanes” as just regular lanes of travel. The SDEIS mentions that traffic and emissions will be less after the new bridge is built but fails to include induced demand. How much induced demand will one lane auxiliary add? Is there a projection for how much induced demand two additional lanes would account

for? Greenhouse gases will increase at the addition of any extra lanes.

JCA comment #: 862

IBR Draft SEIS - RECORD #3504 DETAIL

First Name :	Jim
Last Name :	Owens
Attachments :	DSEIS_3504_Owens_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #3504 DETAIL

Submission Date : 11/18/2024
First Name : Jim
Last Name : Owens
Business/Organization/Agency :

Submission Input :

First Name:
Jim

Last Name:
Owens

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Induced Demand

Comment:
The SDEIS modeling of traffic impacts is deficient in its failure to consider the induced impacts of additional roadway capacity. This is a fatal flaw in the project's NEPA analysis. A fatal NEPA flaw is one that is serious enough and obvious enough that the EIS will likely be judged by the courts as unacceptable as written. Although ODOT/WSDOT and their consultants are well versed in the concept of induced demand, the project team has chosen to avoid its consideration, likely out of fear that to do so will reveal this project to be much

more than simply a bridge replacement with transit and active transportation connections. Any induced demand analysis will likely expose the larger purpose of this project, namely a five-mile freeway expansion. The project's Purpose and Need as set forth in the SDEIS fail to consider or justify this larger project purpose. This fatal flaw can be expected to doom any SFEIS to a successful legal challenge as deficient. As affected parties (and primary financiers), the citizens of Oregon and Washington deserve better.

JCA comment #: 875

IBR Draft SEIS - RECORD #3505 DETAIL

First Name :	Chelsea
Last Name :	Stewart-Fusek
Attachments :	DSEIS_3505_Stewart_Fusek_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #3505 DETAIL

Submission Date : 11/18/2024
First Name : Chelsea
Last Name : Stewart-Fusek
Business/Organization/Agency :

Submission Input :

First Name:
Chelsea

Last Name:
Stewart-Fusek

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Induced Demand

Comment:
It is very disappointing to see that the DSEIS does not discuss induced demand, as it is clear that the preferred alternative will result in an increased number of vehicles on the road compared to the no-action alternative. DOT's failure to discuss induced demand is a glaring omission that undercuts much of the rest of the impacts analysis, particularly re: GHG emissions and impacts to air quality generally.

JCA comment #: 874

IBR Draft SEIS - RECORD #3506 DETAIL

First Name :	Theodore
Last Name :	Bentley
Attachments :	DSEIS_3506_Bentley_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #3506 DETAIL

Submission Date : 11/18/2024
First Name : Theodore
Last Name : Bentley
Business/Organization/Agency :

Submission Input :

First Name:
Theodore

Last Name:
Bentley

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Acquisitions and Displacement

Comment:
The few plans to review show a complete disregard to all members of the Hayden Island Community. A project like this should be designed and implemented with the least amount of disruptions to the residences and business that are going to be impacted impacted. The expected timeline to completion is 15 years. That appears to be an excesssive time period. My moorage JBMI will be the most heavily impacted financially, visually and a severe loss of use. As I understand the plans you wou use our moorage as a staging area. There

are many non residential empty areas on the south bank to stage construction!
Why punish the residence even more by utilizing our moorage as your primary staging area?

JCA comment #: 867

IBR Draft SEIS - RECORD #3507 DETAIL

First Name :	Kyle
Last Name :	Herrlinger
Attachments :	DSEIS_3507_Herrlinger_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #3507 DETAIL

Submission Date : 11/18/2024
First Name : Kyle
Last Name : Herrlinger
Business/Organization/Agency :

Submission Input :

First Name:
Kyle

Last Name:
Herrlinger

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Visual Quality

Comment:
Designs of each proposed bridge are not appealing stylistically or aesthetically. Single and double deck renders look like blocky concrete monoliths. Vancouver waterfront and businesses on Hayden Island will to have to stare at this bridge, it should be a point of pride to make it appealing looking as well. Can stylistic elements be applied? Will we get a chance to examine further design choices as they are made? Bridges like St. Johns and Tilikum in Portland, Golden Gate and the Bay Bridge in California have an iconic beauty to them. We can’t go

high with design like these bridges due to airspace restrictions, but if we are building a 100 year bridge, it shouldn’t be a giant ugly hunk of concrete. Can further design options be explored?

JCA comment #: 864

IBR Draft SEIS - RECORD #3510 DETAIL

First Name :	Coru
Last Name :	Pinckard
Attachments :	DSEIS-3510_Pinckard_Original.pdf (11 kb)

IBR Draft SEIS - RECORD #3510 DETAIL

Submission Date : 11/18/2024
First Name : Coru
Last Name : Pinckard
Business/Organization/Agency :

Submission Input :

First Name:
Coru

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 #: 879

IBR Draft SEIS - RECORD #3511 DETAIL

First Name :	Tom
Last Name :	Buchele
Attachments :	DSEIS-3511_Buchele_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #3511 DETAIL

Submission Date :	11/18/2024
First Name :	Tom
Last Name :	Buchele
Business/Organization/Agency :	Earhtrise Law Center

Submission Input :

First Name:
Tom

Last Name:
Buchele

Business or Organization:
Earhtrise Law Center

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Other

Comment:
I represented the plaintiffs in the lawsuit that challenged the underlying EIS, that is supposedly being

supplemented. I also am a member of NEDC and the NE Coalition of Neighborhoods. Although that lawsuit is administratively closed and I do not represent the plaintiffs regarding this continuing NEPA process, I must object because neither myself nor those clients received specific, individual notice regarding any public hearings regarding this DSEIS or the availability of this SDEIS for public comment. NEPA's CEQ regulations clearly require that such obviously interested parties receive specific, individualized notice and that did not occur. In fact the only notice I received was a general U.S. mail form notice to the public at my personal residence about ten days ago. This is grossly insufficient notice to both the general public (not nearly enough time to prepare comments on this complicated DSEIS) and to interested parties. You need to reopen the public comment process and give interested parties individual notice and the public much more time to comment than 10 days. With all the money you have there is no excuse for this failure to give the public and interested parties sufficient and legally required notice.

I also incorporate the comments raised by my clients when they commented on the DEIS and FEIS during earlier NEPA processes for this project. None of those prior comments were adequately addressed then and none are addressed by the DSEIS.

JCA comment #: 878

IBR Draft SEIS - RECORD #3512 DETAIL

First Name :	jennifer
Last Name :	saunders
Attachments :	DSEIS-3512_Saunders_Original_Redacted.pdf (50 kb)

IBR Draft SEIS - RECORD #3512 DETAIL

Submission Date : 11/18/2024
First Name : jennifer
Last Name : saunders
Business/Organization/Agency :

Submission Input :

First Name:
jennifer

Last Name:
saunders

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
Please consider the long term future environmental and social impact of this bridge project: plan for higher capacity transit systems. Implement a low-income toll discount effective from the beginning of tolling. Extend the path to Evergreen on the Vancouver side and connect it to the Vancouver/ Williams corridor on the PDX side.
The DSEIS doesn't give sufficient reason for a second auxiliary lane.

JCA comment #: 877

IBR Draft SEIS - RECORD #3513 DETAIL

First Name :	Malena
Last Name :	Lechon-Galdos
Attachments :	DSEIS-3513_Lechon_Original_Redacted.pdf (3 kb)

IBR Draft SEIS - RECORD #3513 DETAIL

Submission Date : 11/18/2024
First Name : Malena
Last Name : Lechon-Galdos
Business/Organization/Agency :

Submission Input :

First Name:
Malena

Last Name:
Lechon-Galdos

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Topic Area:
Transportation

Comment:
I’m just here to say that this seems like a very poor investment of our general fund dollars and that tolling is inequitable and we should just not. That is all thank you

JCA comment #: 876

IBR Draft SEIS - RECORD #3514 DETAIL

First Name :	Erik
Last Name :	Molander
Attachments :	DSEIS-3514_Molander_Original.pdf (165 kb)

IBR Draft SEIS - RECORD #3514 DETAIL

Submission Date :	11/19/2024
First Name :	Erik
Last Name :	Molander
Business/Organization/Agency :	
Attachments :	EPM IBR Synergies Empowered by the IBR.pdf (816 kb)

Submission Input :

Dear Mr. Johnson,

My name is Erik Molander and I am the prior Land Use Chair for the Bridgeton Neighborhood Association. My contact information is as follows:

Erik Molander
[redacted]

I have attached my comments on the leveraging exciting new synergies to improve local active and vehicular transportation between the IBR and the US Army Corp of Engineers Portland Metro Levee Project. There are multiple ways that these two projects can help transform the lives of the residents of the Columbia River Communities.

Sincerely,

Erik Molander

Erik Molander
[redacted]

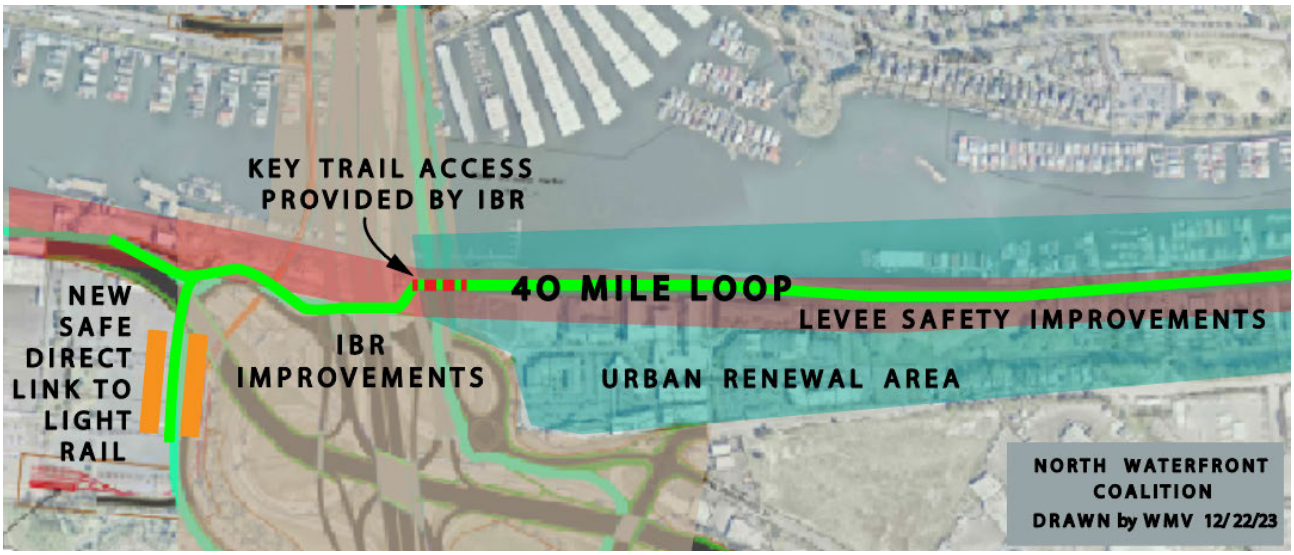
Synergies Empowered by the IBR

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
Erik Molander

IBR Draft SEIS - RECORD #3515 DETAIL

First Name :	Thomas
Last Name :	Hickey
Attachments :	DSEIS-3515_Hickey_Original.pdf (459 kb)

IBR Draft SEIS - RECORD #3515 DETAIL

Submission Date :	11/19/2024
First Name :	Thomas
Last Name :	Hickey
Business/Organization/Agency :	
Attachments :	MLK Undercrossing.pdf (454 kb)

Submission Input :

**

Interstate Bridge Replacement Program

*

Via email ? draftseis@interstatebridge.org
<mailto:draftseis@interstatebridge.org>

Dear IBR team,

I appreciate all of the hard work that has gone into designing and presenting the Draft SEIS to the public, and I wish you well in analyzing and assimilating all of the comments.

This document from the Bridgeton Neighborhood Association accurately expresses the issue at hand, and represents the most significant concern of this project for this community. Freight flow on and off of MLK affects the local region as well as the larger economy, and MUST be designed in coordination with future plans and needs of the city in mind.

Yours,

Tom Hickey

North Portland advocate

IBR CAG; IBR Community Benefits Group

[redacted]

[redacted]

*

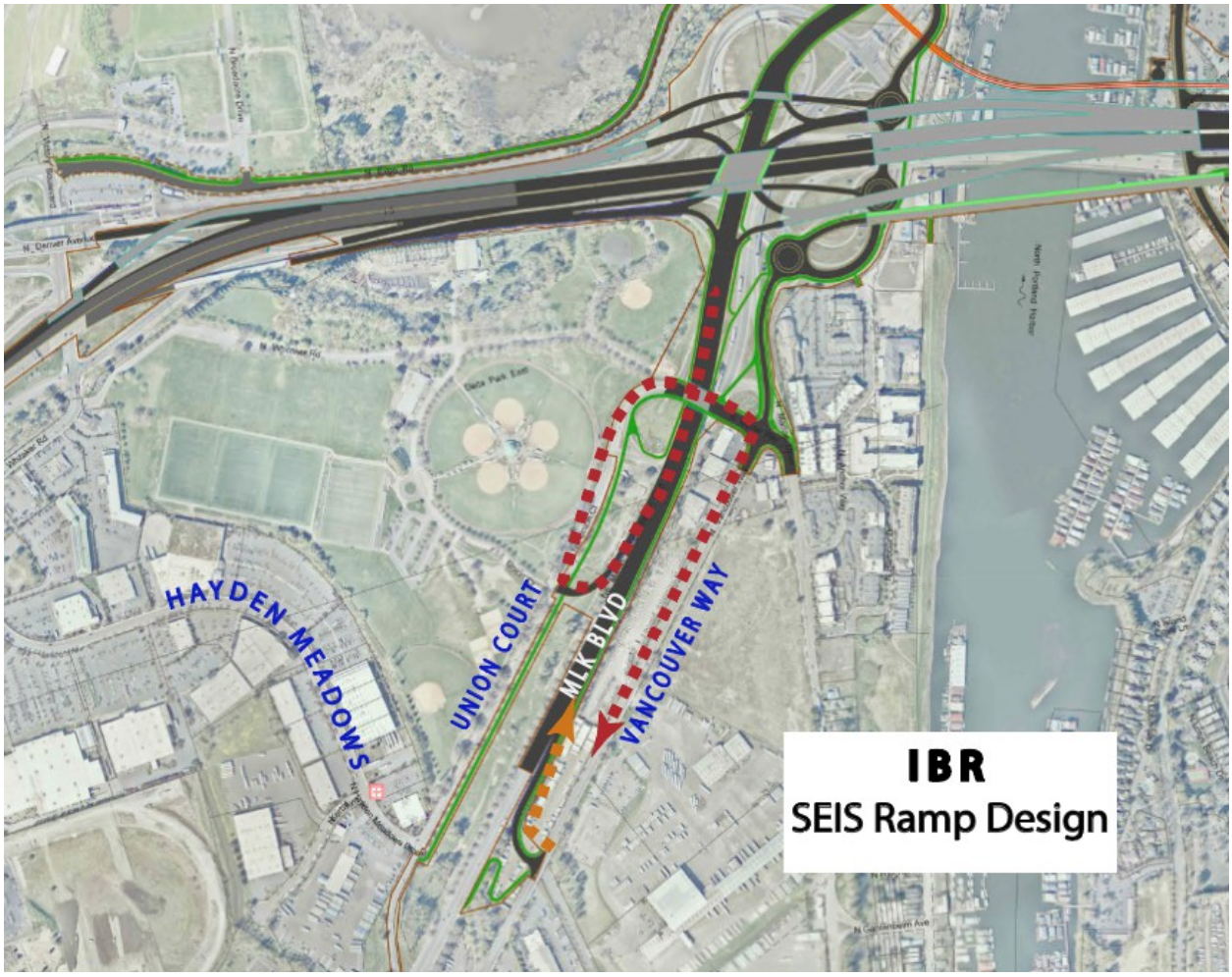
The MLK Undercrossing and Complete Interchange
Better Freight & Neighborhood Access Ramps for the IBR

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

IBR Draft SEIS - RECORD #3516 DETAIL

First Name :	Chris
Last Name :	Hansen
Attachments :	DSEIS-3516_Hansen_Original_Redacted.pdf (4 kb)

IBR Draft SEIS - RECORD #3516 DETAIL

Submission Date : 11/18/2024
First Name : Chris
Last Name : Hansen
Business/Organization/Agency :

Submission Input :

First Name:
Chris

Last Name:
Hansen

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
Replacing the Interstate Bridge is an urgent priority for our region, but it must include considerations that positively impact the health and livability of our local communities. These considerations include:
* Enforce symmetric tolling on the I-5 and I-205 bridges so that there is not an incentive to bypass the new I-5 bridge.
* Constrain traffic speed and volume on Sandy Blvd and other bypasses where drivers seek to avoid tolls.

* Provide quality access to alternative transportation across the Interstate Bridge, including for mass transit and bicycles.

JCA comment #: 886

IBR Draft SEIS - RECORD #3517 DETAIL

First Name :	Kirke
Last Name :	Wolfe
Attachments :	D1-3517_Wolfe_20241118_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #3517 DETAIL

Submission Date : 11/18/2024
First Name : Kirke
Last Name : Wolfe
Business/Organization/Agency :

Submission Input :

First Name: Kirke

Last Name: Wolfe

[redacted]

Concerning the Interstate Bridge Repacement Program, I support appropriate siesmic upgrades to any existing or new bridges across the Columbia River betwen Vancouver and Portland, and including ample provision for public transit and active transportation. No action should be taken that is based on the deeply flawed projections of vehicle miles travelled and congestion under the alternatives considered in the recently released DSEIS, which among other things fail to take account of the well-documented phemonenon of induced demand. This strongly suggests that the proposed increase in total bridge deck width to a total of 158 feet (two 79 foot decks) would be counterproductive.

I support providing not only for present but likely future needs for public transportation in the crossing design, and for adequate buffering for cyclists and pedestrians from the noise and pollution emitted by private motor vehicles. Options for the use of tolling not only to produce revenue but for congestion management should be explicitly considered in any build decsion.

The build focus should be on modestly improving crossing infrastructure and not on a major freeway widening project.

IBR Draft SEIS - RECORD #3518 DETAIL

First Name :	Benjamin
Last Name :	Ayer
Attachments :	DSEIS-3518_Ayer_Original.pdf (9 kb)

IBR Draft SEIS - RECORD #3518 DETAIL

Submission Date :	11/18/2024
First Name :	Benjamin
Last Name :	Ayer
Business/Organization/Agency :	
Attachments :	D1-3518_Ayer_20241118_Original.pdf (7 kb)

Submission Input :

First Name:
Benjamin

Last Name:
Ayer

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Climate Change

Comment:
Thankyou for hearing our concerns. I am excited for what this new bridge can be. It can be a shining star and example of the best bike bridge bike path. In order for this to happen I am in agreement with the suggestions of Oregon walks and the Street Trust. I agree that the multimodal path should be accessible to the light rail. I think that the current plan to have a 100 foot path down to the ground from the bike path is obscene.Travel by foot/bike or transit should be prioritized not punished with a grueling climb.

Additionally I humbly request that along the multimodal lane that there are rest points. It would be so amazing

to have multiple bump outs large enough for 5 people to stand out of the way of travel and to rest and take in the views. This bridge can be an asset and attraction. Having areas for benches and informative plaques would be an educational tool and allow for travelers to have a unique view. I encourage you to think about 50 years from now traveling on the bridge and noting what you are so thankful the planners included. The sellwood bridge and tilikum bridge both have these and they could be even better.

Lastly I do not think there should be a separate bridge built just for Hayden Island. If the reasoning behind this is to avoid a toll, I think there are better ways to address this issue. I am not opposed to tolls as we have learned that the public changes their driving behavior from deterrents.

Thankyou for all your hard work. I am excited to see the best version we can have.

JCA comment #: 884

IBR Draft SEIS - RECORD #3519 DETAIL

First Name :	Steve
Last Name :	Cheseborough
Attachments :	DSEIS-3519_Cheseborough_Original.pdf (6 kb)

IBR Draft SEIS - RECORD #3519 DETAIL

Submission Date :	11/18/2024
First Name :	Steve
Last Name :	Cheseborough
Business/Organization/Agency :	
Attachments :	D1-3519_Cheseborough_20241118_Original.pdf (6 kb)

Submission Input :

First Name:
Steve

Last Name:
Cheseborough

Email:
[redacted]

Topic Area:
Transportation

Comment:
The proposed bridge replacement is an enormous highway expansion in disguise. Its designers and supporters are living in an ignorant past, when many thought expanding highways was good. Now we know better: the way to reduce car traffic, fossil-fuel use, destruction of neighborhoods, global warming and a host of other social, environmental and health issues is by REDUCING freeway lanes and encouraging people to use other means of transportation. Presumably this new bridge will be around for 100 years or more. Let's plan for a wise future, not an ignorant past, and make it a much smaller bridge without any expansion of freeways. Thank you.

JCA comment #: 883

IBR Draft SEIS - RECORD #3520 DETAIL

First Name :	Bruce
Last Name :	Bebb
Attachments :	D1-3520_Bebb_20241119_Original.pdf (10 kb)

IBR Draft SEIS - RECORD #3520 DETAIL

Submission Date : 11/19/2024
First Name : Bruce
Last Name : Bebb
Business/Organization/Agency :

Submission Input :

[redacted]

I agree with all that is in the document forwarded to you.

Bruce Bebb

[redacted]

Vote Before Tolls Committee has intentionally been quiet these past few months as the November election drowned out our messaging. But that is the past and now it's time to ramp up our voice, presence, and impact.

First, let's be clear ... *tolling is still coming* to Portland and Oregon roads and highways. Gov. Kotek paused, but did not stop tolling. *Tolling is a major multi-billion dollar topic at this winter's Oregon Legislative session.*

Second, IP-31 needs your support to get on the '26 ballot. We did not have enough signature momentum to make this year's ballot, but we have just over 18 months to get on the '26 ballot. *IP-31's Right to Vote assures we have a seat at the table* to bring the public's perspective and common sense to all tolling planning & projects. *Everyone who signed before August 2024 needs to sign again.*

- ODOT, WADOT, and Governor Kotek are moving forward with plans for a new, but no bigger, Interstate Bridge over the Columbia river.
- Just 11 months ago the IBR project director Greg Johnson told us the bridge would cost $6B. *Today's estimate is $9B and rising.* While we admit construction costs are up - they are not up 50% in just ONE year!
  - Less than HALF that cost is already lined up. Oregon, Washington, and the Federal government have already chipped in.
  - The answer ... tolls on the backs and from the wallets of those who cross the bridge. The toll share was $1.5B last year, now *tolling's share is up 300% to $4.5B* currently and tolls will continue to be the "subtract answer" plugging the funding gap as project costs continue to rise.
- Tolls are currently estimated to peak at MORE than *$9 dollars a day

or more than $2,000 a year f*or a daily commuter with a few more inches of lane width but no more no more vehicle capacity.

- These *tolls will not sunset (stop)* when construction costs are paid off – they will go on forever.

- The replacement bridge is planned to have 3 lanes north and south, the same as it did when the second span was opened 58 years ago in 1958. *Does any politician think traffic will decline or the PNW region will not grow over the next 58 years?* Adding one more lane each direction now is an incremental cost and will somewhat future proof the bridge.

- *Light rail, at 1 billion a mile*, is the most expensive light rail project on earth! Our leaders want us to pay $2B for this expansion and then to subsidize the fares of the travelers! The general public in SW Washington and those of us in Oregon don't want this expansion ... and we can't afford it.

- TriMet already owns the Expo Center - I am sure we can triple the parking lot size there and add C-Tran busses to accommodate the few hundred riders who would use the Vancouver Max extension for less than a $1M per year ... 1/200 of the cost of extended light rail!

- *Bridge tolls are planned start before the bridge construction.* And it's not clear that the Glenn Jackson I-205 bridge will be tolled. Guess where the I-5 bridge traffic will go once tolls start?

- *ODOT still has plans to toll I-5, I-205, Hwy 26, and Hwy 217* for “congestion relief”. More tolls will surely follow.

So Are We Opposed to an Earthquake Resistant and Traffic-Efficient New Bridge? No, we absolutely agree that replacement bridge is necessary and we know we need to pay for it. But we don't want the current politician's boondoggle that costs more than we can afford. Common sense needs to prevail. The public demands a seat at the table to be involved in re-focusing reigning in this project. It's our bridge, our cash, and our table!

Since Vote Before Tolls Committee was founded in 2020 we have never been asked by planners to share and discuss our thoughts to help optimize any tolling project. We've attended dozens of "public meetings' where ODOT and state leaders listened and NEVER responded or asked us to engage on behalf of the public we represent. But to give them credit, the do count and take credit for our attendance as a "public contact".

IP-31 Covers ALL Oregon Roads, Bridges and Highways

The initiative give citizens the right to vote on all new tolls ... forcing accountability by ODOT, PBOT, Ti-MET, and our state legislators.

IP-31 is retroactive to 2018 and even covers bicyclists who seem to think they will never have to start paying for their infrastructure.

Oregon legislatative leadership shut down all discussions about tolling during last year's session and are on a path to do the same in 2025. IP-31 will call them to accountability for their many multi-billion dollar tolling spending sprees.

IBR Draft SEIS - RECORD #3521 DETAIL

First Name :	Dave
Last Name :	King
Attachments :	DSEIS-3521_King_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #3521 DETAIL

Submission Date :	11/18/2024
First Name :	Dave
Last Name :	King
Business/Organization/Agency :	Climate Jobs PDX
Attachments :	D-3521_King_20241118_Original.pdf (7 kb)

Submission Input :

First Name:
Dave

Last Name:
King

Business or Organization:
Climate Jobs PDX

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
The new bridge should be a simple as possible considering a reduction in auto traffic and increase in light rail, bike and foot traffic driven by costs and global warming. It also needs to withstand the coming subduction earthquake that may shake 30 feet and last for 4 minutes. If the project is bigger than necessary or doesn't meet these needs, decision makers will beheld accountable for the long life of the structure. So "keep it simple stupid."

JCA comment #: 882

IBR Draft SEIS - RECORD #3522 DETAIL

First Name :	Noelle
Last Name :	Studer-Spevak
Attachments :	DSEIS-3522_Studer_Original_Redacted.pdf (5 kb)

IBR Draft SEIS - RECORD #3522 DETAIL

Submission Date :	11/18/2024
First Name :	Noelle
Last Name :	Studer-Spevak
Business/Organization/Agency :	Families for Climate

Submission Input :

First Name:
Noelle

Last Name:
Studer-Spevak

Business or Organization:
[redacted]

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Induced Demand

Comment:
Dear IRB Team,
I am concerned that overbuilding the bridge will exacerbate urban sprawl in Clark County. We know that there are many benefits of living in Washington and commuting to Oregon, from taxes and shopping, to quality schools and cost of living. However, we also know that we are in the midst of a major climate crisis that requires us to carefully consider how our infrastructure investments incentivise choices about where people

work, live and play. Some level of constraint crossing the bridge, whether it's cost or time, is important for guiding household decisions. And we need transit and active transportation carrots to help people make choices aligned with a zero-carbon future. Please do not oversize the bridge. One auxiliary lane is plenty. Prioritizing bridge replacement, transit enhancements, and active transportation—without extensive freeway expansion—would be beneficial and cost-effective.
I got to see Ira Flatow live last month, here in Portland. That week they aired a segment on induce demand. Listen here:
https://www.sciencefriday.com/segments/widening-highways-makes-traffic-worse/
Sincere appreciation for your hard work,
Noelle Studer-Spevak

JCA comment #: 881

IBR Draft SEIS - RECORD #3523 DETAIL

First Name :	Beth
Last Name :	Fuller
Attachments :	DSEIS-3523_Fuller_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #3523 DETAIL

Submission Date :	11/18/2024
First Name :	Beth
Last Name :	Fuller
Business/Organization/Agency :	
Attachments :	D1-3523_Fuller_20241118_Original.pdf (7 kb)

Submission Input :

First Name:
Beth

Last Name:
Fuller

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
Please don't make us another LA. No one needs that. There are plenty of great cities we can look to in order to improve transportation. For inner city, look at Amsterdam or Donostia/San Sebastian. Bigger isn't better, more doesn't solve the problem and usually makes it worse. Let's not even talk about the climate impact of making it

way for more lanes.

JCA comment #: 880

IBR Draft SEIS - RECORD #3524 DETAIL

First Name :	Leigh Anne
Last Name :	Francis
Attachments :	The-40-Mile-Loop-Connections.pdf (311 kb)

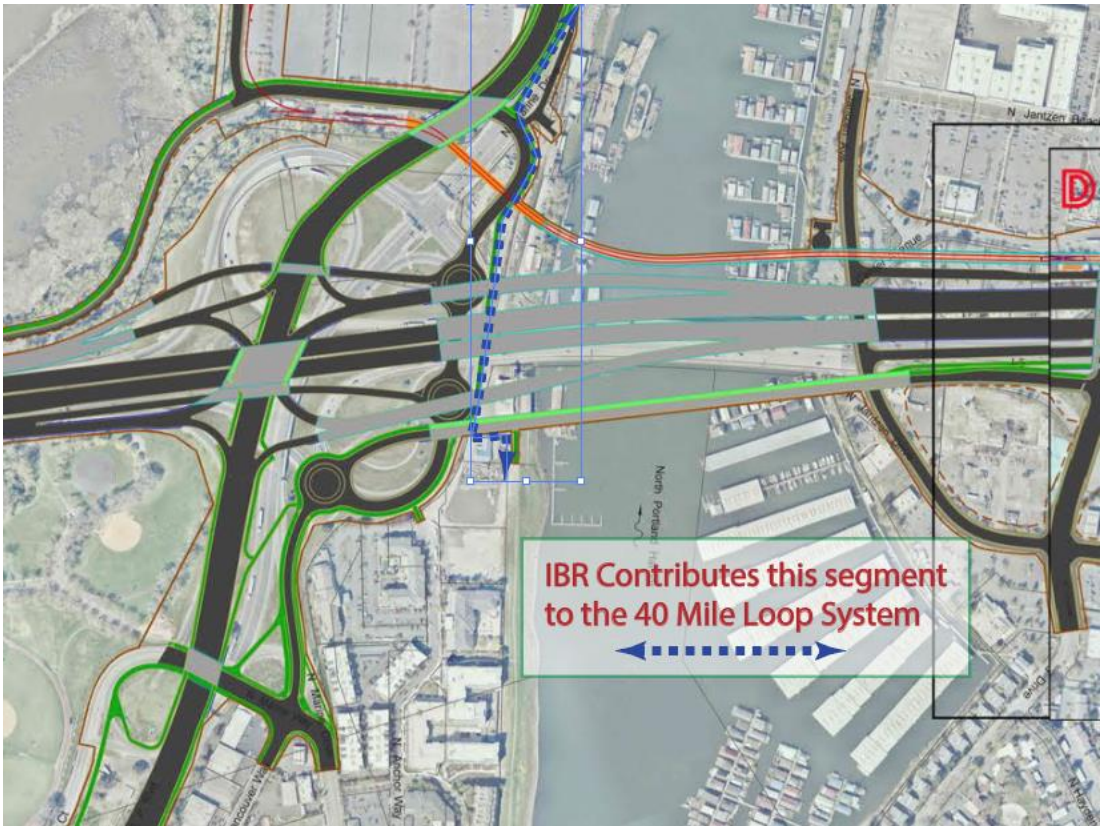
Leigh Anne and Phil Francis
Comments on IBR Multi-Use path connections
to the 40-Mile Loop East/West Corridor

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.*

Respectfully,

Leigh Anne and Phil Francis
173 NE Bridgeton Road Slip #6
Portland OR 97211
laleggs2@gmail.com

IBR Draft SEIS - RECORD #3525 DETAIL

First Name :	Erik
Last Name :	Molander
Attachments :	DSEIS-3525_Molander_Original.pdf (639 kb) EPM_IBR_Comments_Bridge_Architecture.pdf (847 kb)

IBR Draft SEIS - RECORD #3525 DETAIL

Submission Date :	11/19/2024
First Name :	Erik
Last Name :	Molander
Business/Organization/Agency :	
Attachments :	EPM IBR Comments Bridge Architecture.pdf (847 kb)

Submission Input :

Dear Mr. Johnson,

My name is Erik Molander and I am the prior Land Use Chair for the Bridgeton Neighborhood Association. My contact information is as follows:

Erik Molander
[redacted]

I have attached my comments on the aesthetics of the bridge and its societal impacts with an alternative I would like you to consider.

Sincerely,

Erik Molander

Erik Molander
[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
Erik Molander

Erik Molander
340 NE BRIDGETON ROAD PORTLAND OR 97211

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
Erik Molander

IBR Draft SEIS - RECORD #3526 DETAIL

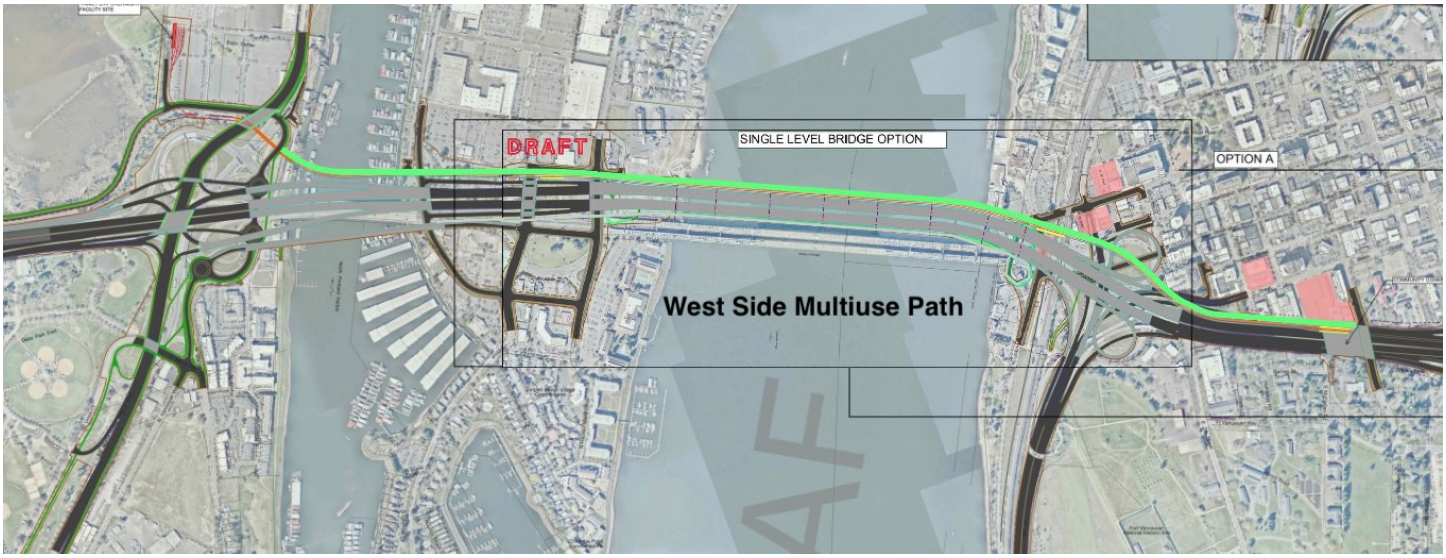
First Name :	Thomas
Last Name :	Hickey
Attachments :	West Side Mulituse Path.pdf (297 kb)

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.



Thank you,

IBR Draft SEIS - RECORD #3527 DETAIL

First Name :	Erik
Last Name :	Molander
Attachments :	DSEIS-3527_Molander_Original.pdf (203 kb)

IBR Draft SEIS - RECORD #3527 DETAIL

Submission Date :	11/19/2024
First Name :	Erik
Last Name :	Molander
Business/Organization/Agency :	Bridgeton Neighborhood Association
Attachments :	DSEIS_3527_Molander_Original.pdf (1 mb)

Submission Input :

Dear Mr. Johnson,

My name is Erik Molander and I am the prior Land Use Chair for the Bridgeton Neighborhood Association. My contact information is as follows:

Erik Molander
[redacted]

I have attached my comments on the bike / freight conflicts at the MLK interchange with an alternative I would like you to consider.

Sincerely,

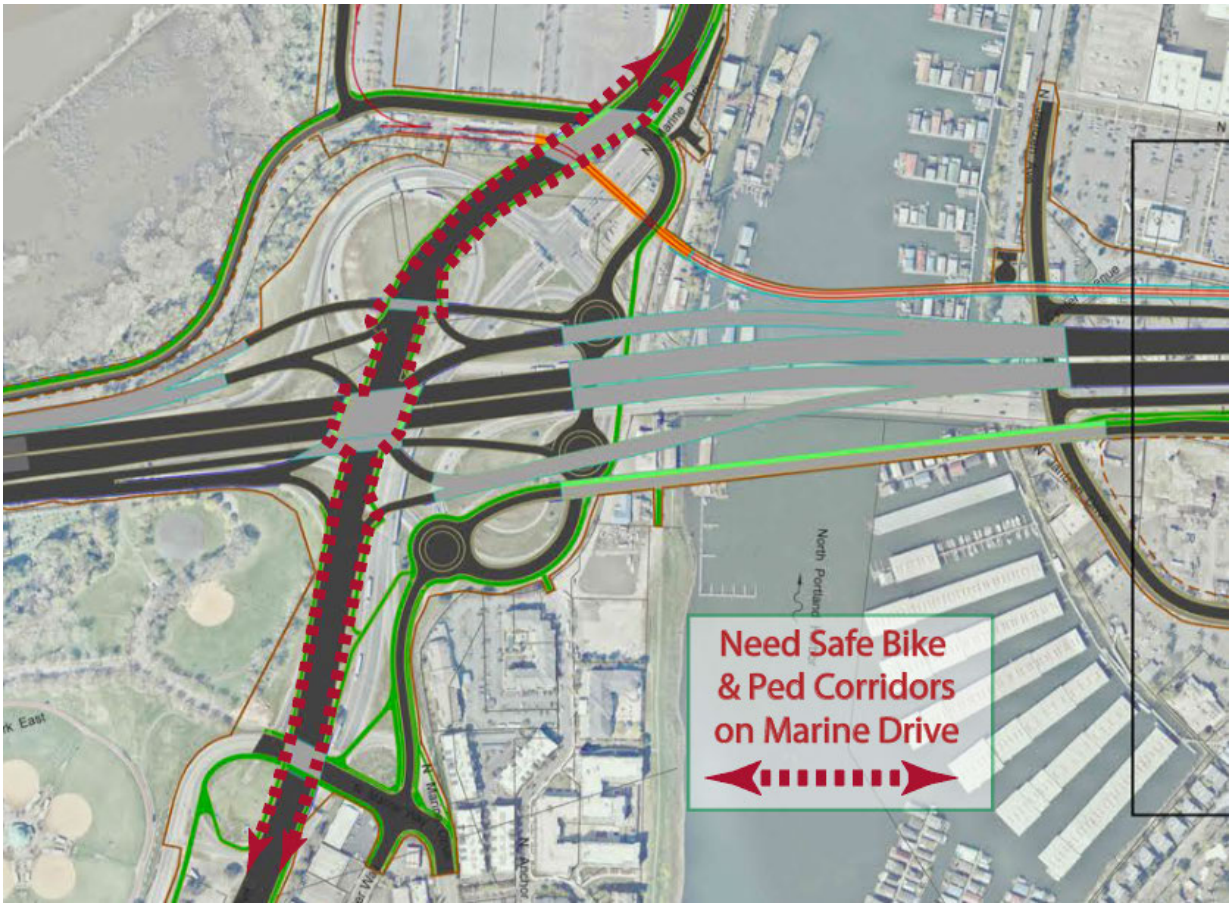
Erik Molander

Erik Molander
[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 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 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
Erik Molander

IBR Draft SEIS - RECORD #3528 DETAIL

First Name :	Leigh Anne and Phil
Last Name :	Francis
Attachments :	DSEIS_3528_Francis_Original.pdf (142 kb) The-Vancouver-Dip.pdf (145 kb)

IBR Draft SEIS - RECORD #3528 DETAIL

Submission Date :	11/18/2024
First Name :	Leigh Anne and Phil
Last Name :	Francis
Business/Organization/Agency :	Bridgeton Neighborhood Association

Submission Input :

First Name:
Leigh Anne and Phil

Last Name:
Francis

Business or Organization:
Bridgeton

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
Reduce ways to reduce out of direction travel for Active Transportation Users particularly on the Vancouver Dip

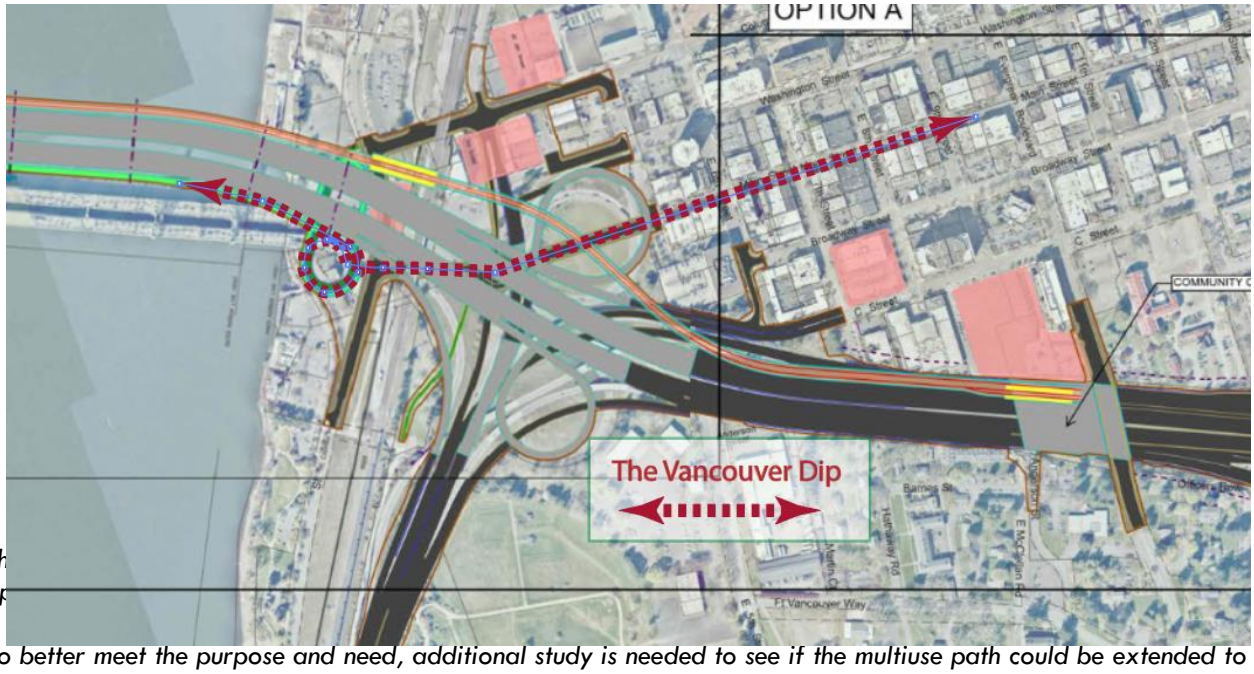
Attachment (maximum one):
The-Vancouver-Dip.pdf

JCA comment #: 888

Leigh Anne and Phil Francis
Comments on 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.



Th *and op*

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.

Respectfully,
Leigh Anne and Phil Francis

[redacted]

Leigh Anne and Phil Francis
Comments on 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.

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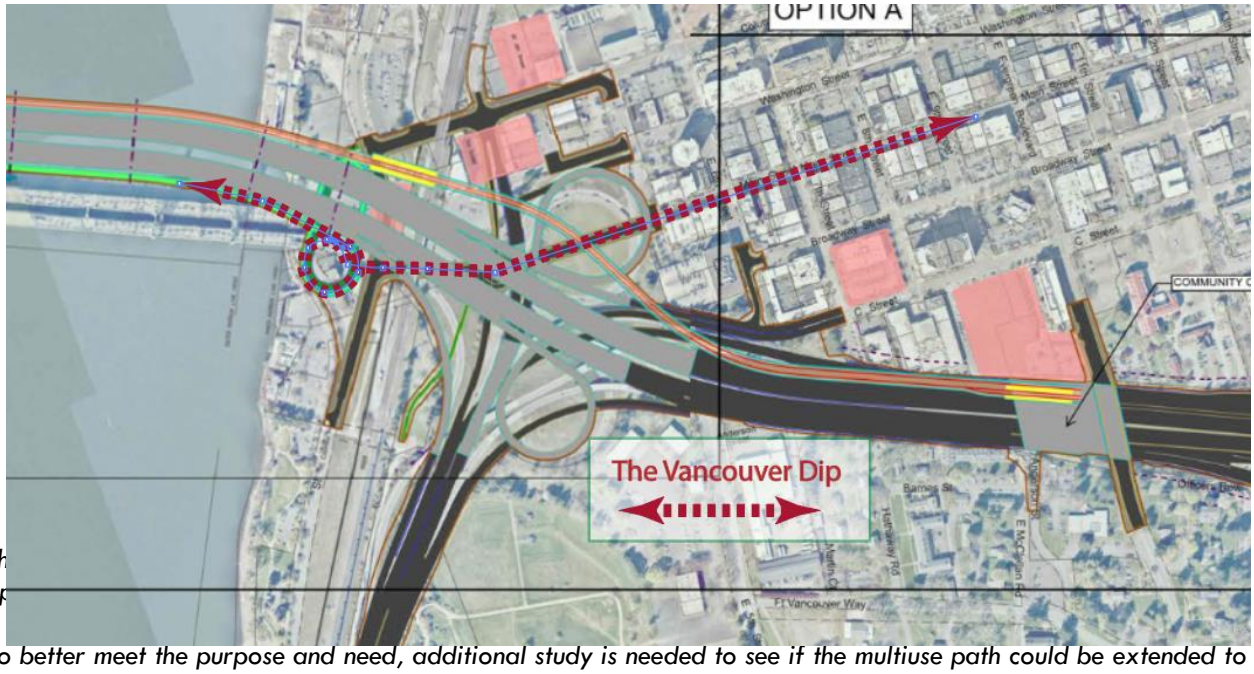


Th *and op*

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.

Respectfully,
Leigh Anne and Phil Francis
173 NE Bridgeton Road Slip #6
Portland OR 97211
laleggs2@gmail.com

IBR Draft SEIS - RECORD #3529 DETAIL

First Name :	Erik
Last Name :	Molander
Attachments :	DSEIS-3529_Molander_Original.pdf (421 kb)

IBR Draft SEIS - RECORD #3529 DETAIL

Submission Date :	11/19/2024
First Name :	Erik
Last Name :	Molander
Business/Organization/Agency :	Bridgeton Neighborhood Association
Attachments :	DSEIS_3529_Molander_Original.pdf (3 mb)

Submission Input :

Dear Mr. Johnson,

My name is Erik Molander and I am the prior Land Use Chair for the Bridgeton Neighborhood Association. My contact information is as follows:

Erik Molander
[redacted]

I have attached my comments on the creation of an undercrossing of MLK Blvd. with an alternative I would like you to consider.

Sincerely,

Erik Molander

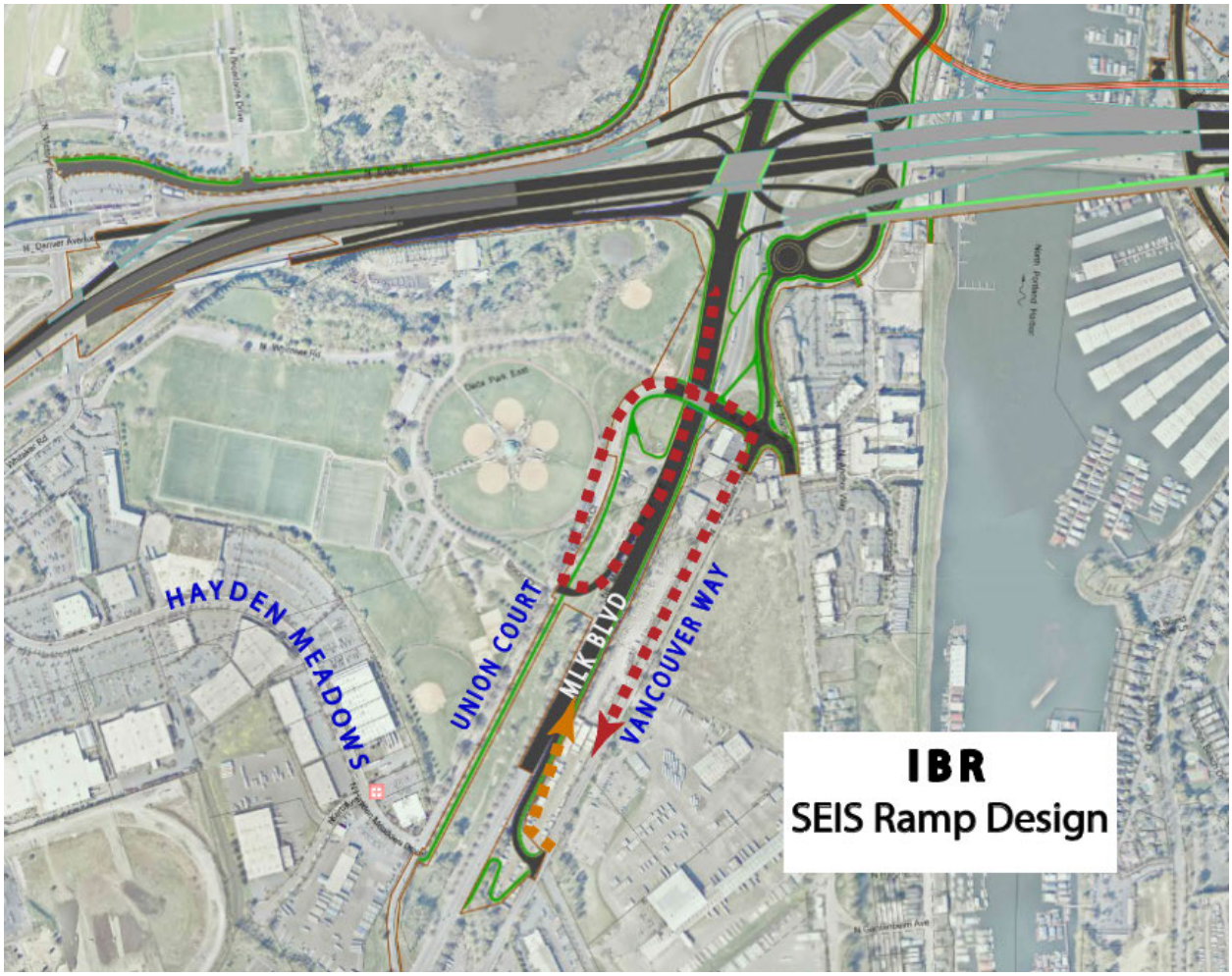
The MLK Undercrossing and Complete Interchange
Better Freight & Neighborhood Access Ramps for the IBR

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
Erik Molander

IBR Draft SEIS - RECORD #3530 DETAIL

First Name :	Leigh Anne and Phil
Last Name :	Francis
Attachments :	DSEIS_3530_Francis_Original.pdf (285 kb)

IBR Draft SEIS - RECORD #3530 DETAIL

Submission Date :	11/18/2024
First Name :	Leigh Anne and Phil
Last Name :	Francis
Business/Organization/Agency :	Bridgeton Neighborhood Association
Attachments :	DSEIS_3530_Francis_Original.pdf (245 kb)

Submission Input :

First Name:
Leigh Anne & Phil

Last Name:
Francis

Business or Organization:
Bridgeton

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
Study Building Multi-use path next to the Transit for better interconnectivity

Attachment (maximum one):
West-Side-Mulituse-Path.pdf

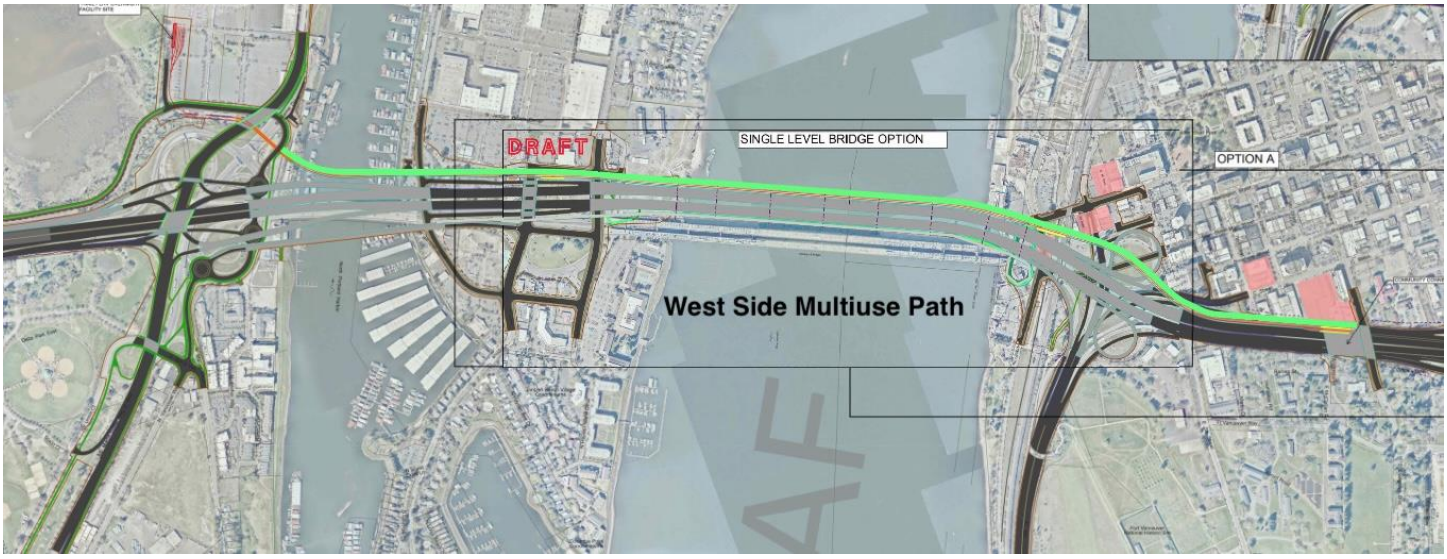
JCA comment #: 887

Leigh Anne and Phil Francis
Comments on Path 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.



• 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

Respectfully,
Leigh Anne and Phil Francis
[redacted]

IBR Draft SEIS - RECORD #3531 DETAIL

First Name :	Erik
Last Name :	Molander
Attachments :	DSEIS-3531_Molander_Original.pdf (452 kb)

IBR Draft SEIS - RECORD #3531 DETAIL

Submission Date :	11/19/2024
First Name :	Erik
Last Name :	Molander
Business/Organization/Agency :	Bridgeton Neighborhood Association
Attachments :	DSEIS_3531_Molander_Original.pdf (4 mb)

Submission Input :

Dear Mr. Johnson,

My name is Erik Molander and I am the prior Land Use Chair for the Bridgeton Neighborhood Association. My contact information is as follows:

Erik Molander
[redacted]

I have attached my comments on separating bicycle and freight traffic wit an alternative I would like you to consider.

Sincerely,

Erik Molander

Erik Molander
[redacted]

Separating Freight and Bike Travel
on the Marine Drive Interchange and On-Ramps

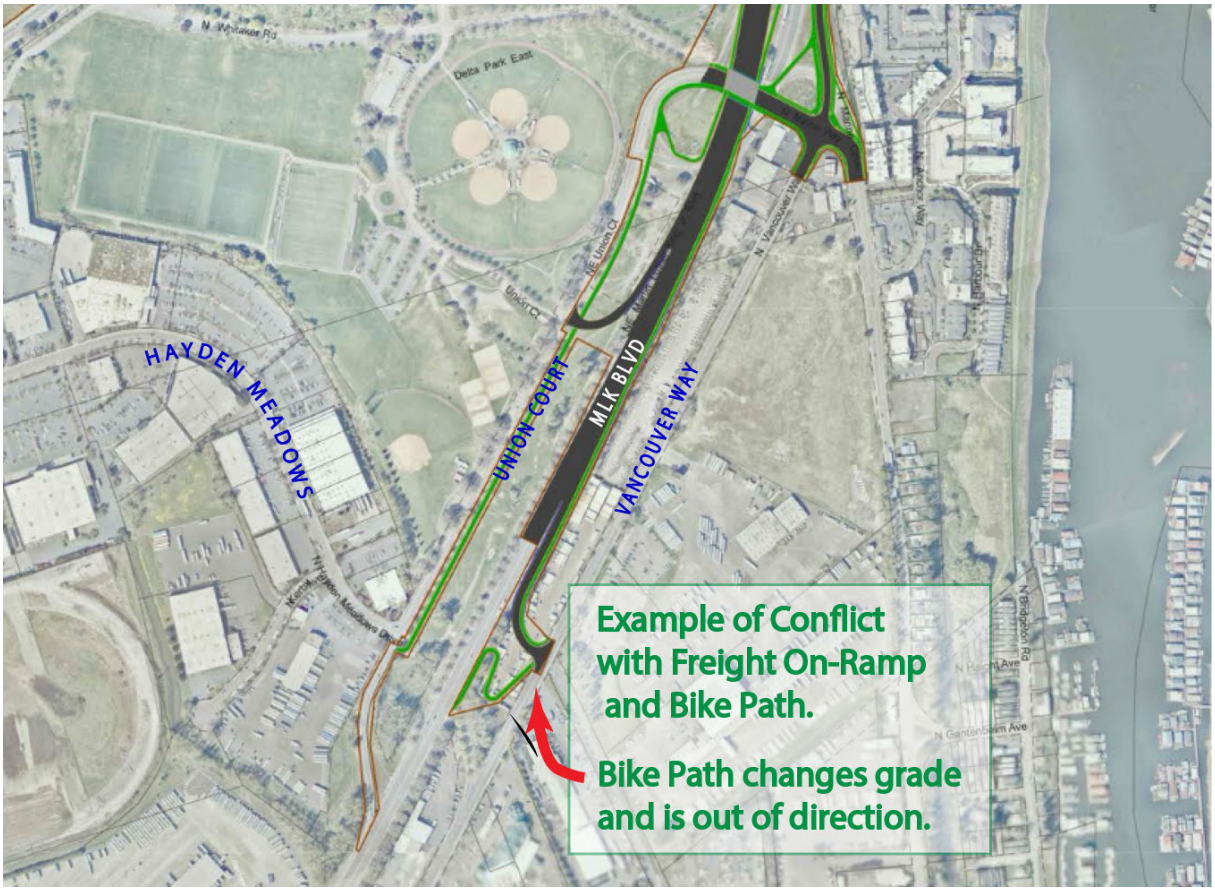
One important purpose and need of the IBR is to (c) improve highway freight mobility and address interstate travel and commerce needs in the Program area.

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.

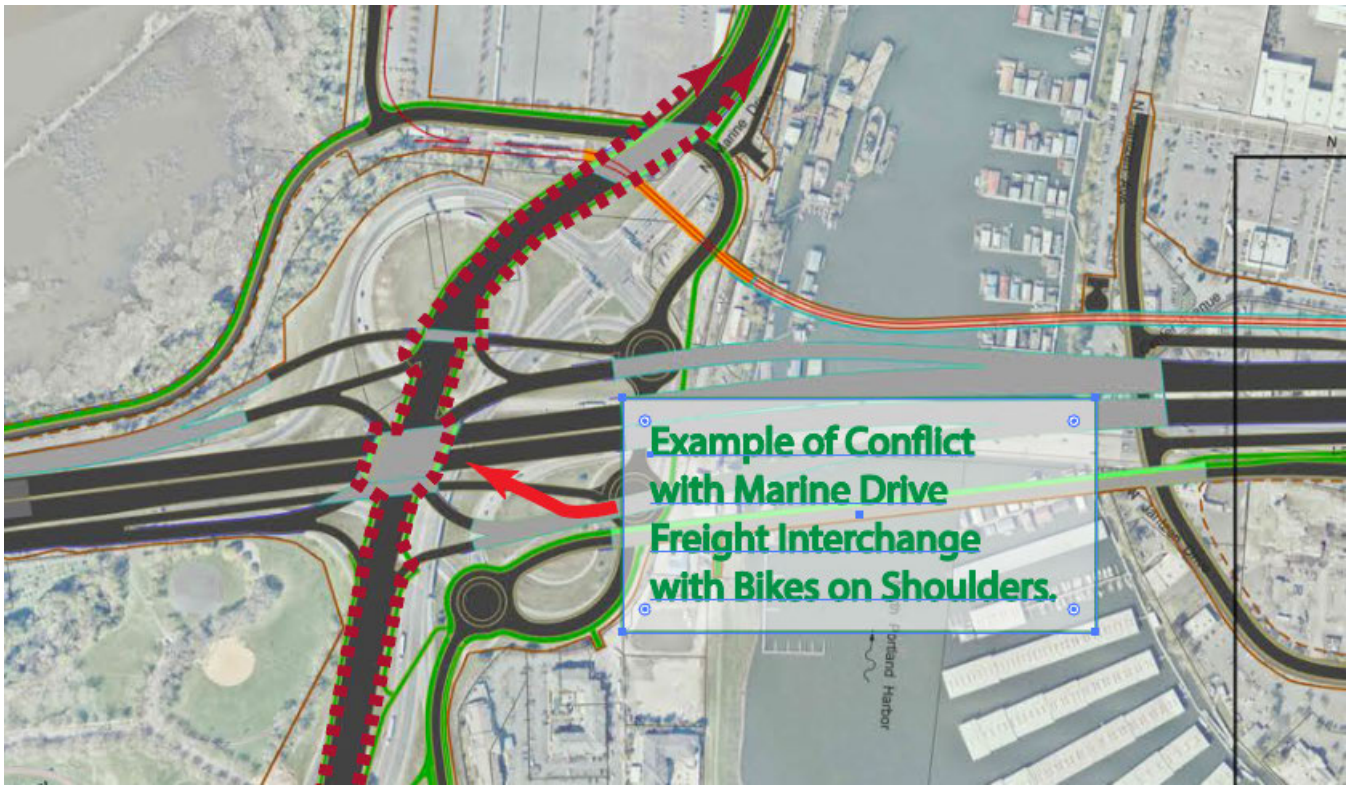
Examples of Conflicts between Freight and Active Transportation users.

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.



Erik Molander
[redacted]

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,

Erik Molander
[redacted]

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

Erik Molander

IBR Draft SEIS - RECORD #3532 DETAIL

First Name :	Thomas
Last Name :	Hickey
Attachments :	DSEIS-3532_Hickey_Original.pdf (300 kb)

IBR Draft SEIS - RECORD #3532 DETAIL

Submission Date :	11/19/2024
First Name :	Thomas
Last Name :	Hickey
Business/Organization/Agency :	
Attachments :	West Side Mulituse Path.pdf (297 kb)

Submission Input :

Interstate Bridge Replacement Program

*

Via email ? draftseis@interstatebridge.org
<mailto:draftseis@interstatebridge.org>

Dear IBR team,

I appreciate all of the hard work that has gone into designing and presenting the Draft SEIS to the public, and I wish you well in analyzing and assimilating all of the comments.

This document from the Bridgeton Neighborhood Association accurately expresses the issue at hand. Pedestrian and bike access to the elevators at the Light Rail station in Vancouver will improve usability of the system tremendously.

Yours,

Tom Hickey

North Portland advocate

IBR CAG; IBR Community Benefits Group

[redacted]

[redacted]

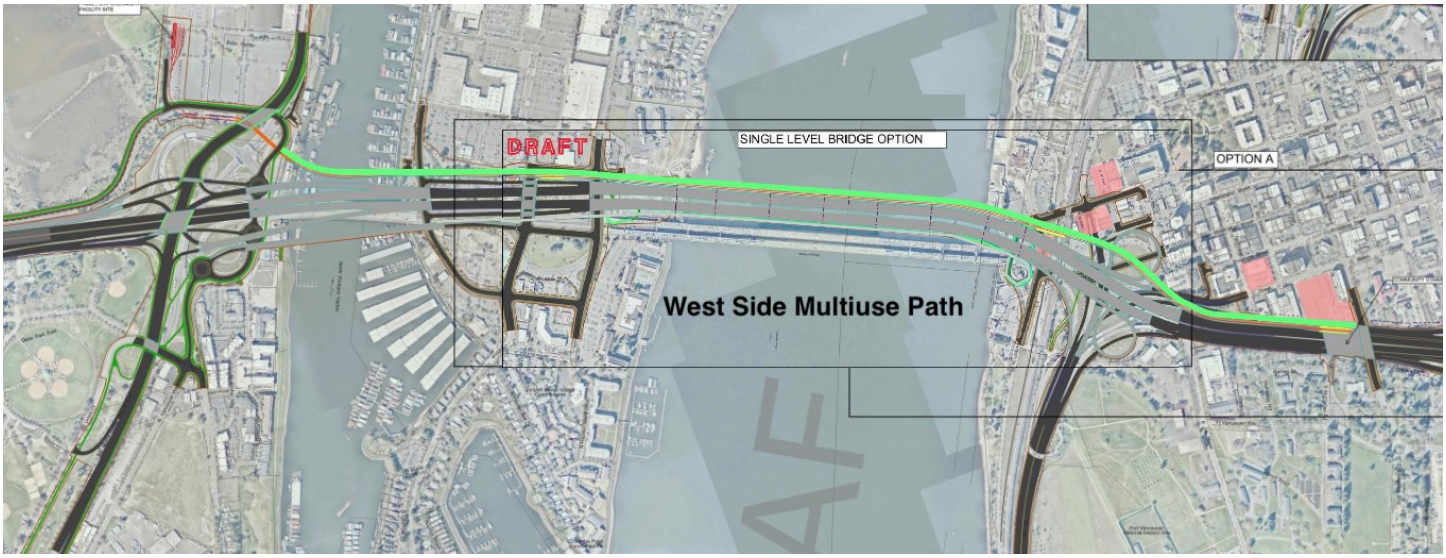
*

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.



Thank you,

IBR Draft SEIS - RECORD #3533 DETAIL

First Name :	Derek
Last Name :	Malsam
Attachments :	DSEIS_3533_Malsam_Original.pdf (180 kb)

IBR Draft SEIS - RECORD #3533 DETAIL

Submission Date :	11/19/2024
First Name :	Derek
Last Name :	Malsam
Business/Organization/Agency :	Jubitz Trucking Company
Attachments :	DSEIS_3533_Malsam_Original.pdf (49 kb)

Submission Input :

Please see attached comment on behalf of Jubitz Corporation/Fleet Leasing Inc. regarding the Interstate Bridge Replacement Project.

Thank you,
Derek

Derek Malsam
[redacted]

JUBITZ CORPORATION

November 18, 2024

Interstate Bridge Replacement

Re: Draft SEIS Public Comment

Jubitz Corporation operates a truck stop on Vancouver Way that requires easy access to and from I-5. We want to express two concerns we have in review of the Draft SEIS:

1. **Access to Vancouver Way from both directions of I-5.** The current design creates a series of sharp turns that are both difficult and confusing for semi traffic to manage. We request consideration for a new undercrossing on MLK at Hayden Meadows to allow one direction of traffic to access Vancouver Way from MLK. The current design includes an onramp back to MLK that can remain for traffic heading toward I-5. Keeping all freeway traffic on MLK versus directing through Delta Park traffic will reduce driver confusion, congestion and improve safety.

2. **Lack of detail regarding the temporary construction easement on our property.** Part of our property where we operate a truck service center and paid parking area is marked for temporary construction easement. Of particular concern, is the scope of this easement including duration, size and what equipment will be stored on our property. Maneuverability of the yard is very important so we can service trucks up to 73 feet on the property efficiently. We fear there could be a potential economic impact on our business due to these easements.

Sincerely,

Derek Malsam
Chief Financial Officer

[redacted]

IBR Draft SEIS - RECORD #3534 DETAIL

First Name :	Leigh Anne and Phil
Last Name :	Francis
Attachments :	DSEIS3534_Francis_OG.pdf (294 kb)

IBR Draft SEIS - RECORD #3534 DETAIL

Submission Date :	11/18/2024
First Name :	Leigh Anne and Phil
Last Name :	Francis
Business/Organization/Agency :	Bridgeton Neighborhood Association
Attachments :	DSEIS_3534_Francis_Original.pdf (298 kb)

Submission Input :

First Name:
Leigh Anne and Phil

Last Name:
Francis

Business or Organization:
Bridgeton

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
Study a better connection for the ramps on and off MLK Blvd - The MLK Undercrossing - See Attachment

Attachment (maximum one):
MLK-Undercrossing.pdf

JCA comment #: 896

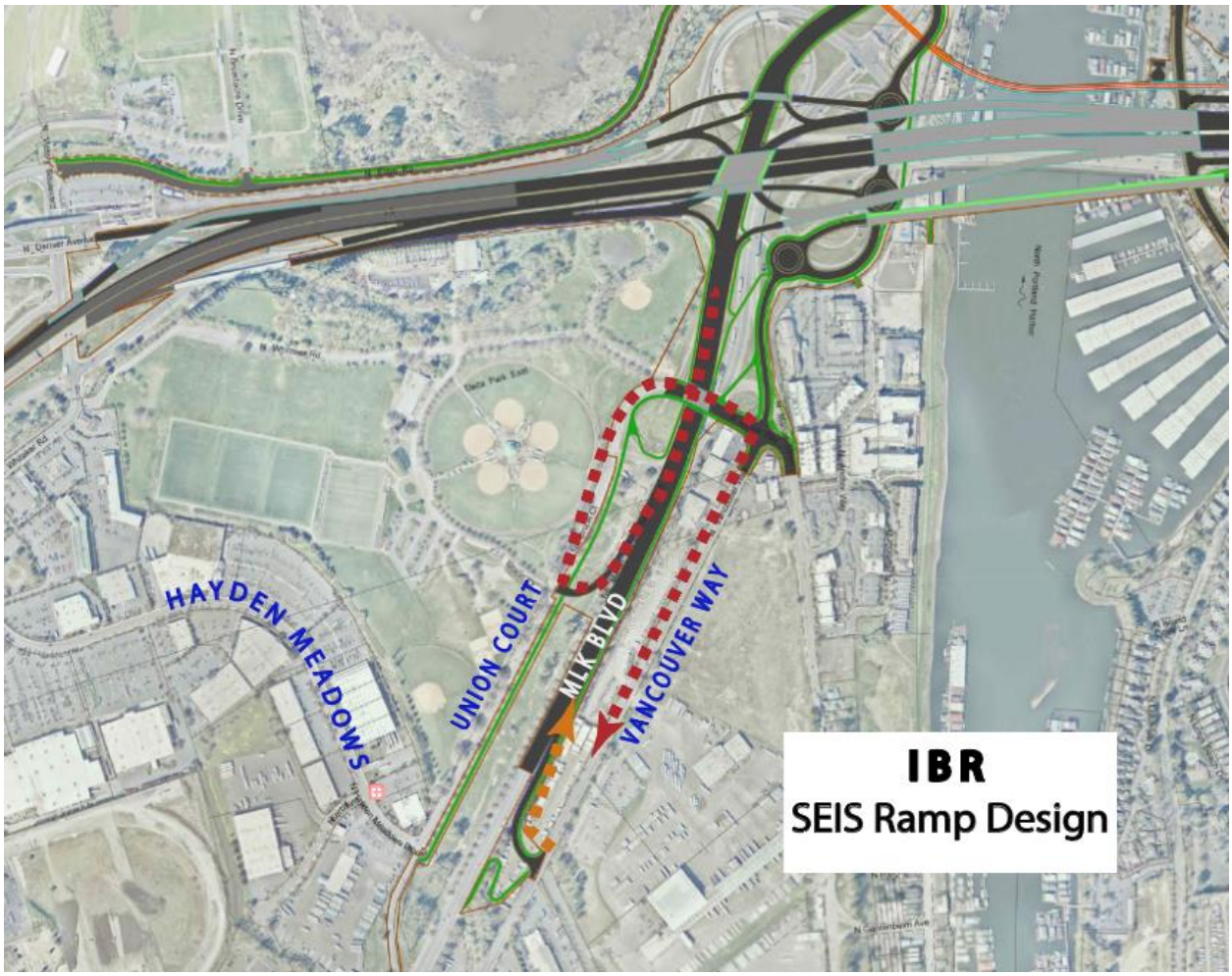
Leigh Anne and Phil Francis
Build a MLK Undercrossing to Better Meet the Purpose and Need

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.

Respectfully,
Leigh Anne and Phil Francis
[redacted]

IBR Draft SEIS - RECORD #3535 DETAIL

First Name :	Torsten
Last Name :	Anderson
Attachments :	DSEIS_3535_Johnson_Original.pdf (4 kb)

IBR Draft SEIS - RECORD #3535 DETAIL

Submission Date : 11/18/2024
First Name : Torsten
Last Name : Anderson
Business/Organization/Agency :

Submission Input :

First Name:
Torsten

Last Name:
Anderson

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Cumulative Effects

Comment:
I am concerned that the IBR is a massively over-scaled project that will saddle Oregon and Washington with debt while increasing pollution, congestion, and VMT in the Portland Metropolitan region. I strongly suggest that the Federal Government deny the Interstate Bridge Program a Record of Decision under NEPA until ODOT and WASHDOT propose a project with a more limited scope.

I strongly support improved transit / light rail expansion into Vancouver, improved bike/pedestrian access across the Columbia, seismic-safe infrastructure, and decongestion, but I think the IBR proposals as currently designed fail to deliver quality solutions to any of these goals. This program is at core a needless freeway expansion that will induce demand and runs counter to our local and regional values and does not meet Federal goals and standards.

I would much rather see a scaled-back, phased approach to this project that incorporates improved ramp metering and decongestion tolling to let traffic run smoothly. Seismic upgrades/replacements to bridges and light rail expansion are essential, but in this case it appears that they are an being used as an excuse for a massive and unnecessary highway expansion.

JCA comment #: 895

IBR Draft SEIS - RECORD #3536 DETAIL

First Name :	Leigh Anne and Phil
Last Name :	Francis
Attachments :	DSEIS3536_Francis_OG.pdf (572 kb)

IBR Draft SEIS - RECORD #3536 DETAIL

Submission Date :	11/18/2024
First Name :	Leigh Anne and Phil
Last Name :	Francis
Business/Organization/Agency :	Bridgeton Neighborhood Association
Attachments :	DSEIS_3536_Francis_Original.pdf (341 kb)

Submission Input :

First Name:
Leigh Anne and Phil

Last Name:
Francis

Business or Organization:
Bridgeton

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
Make sure that conflicts between Freight and Bike Users is separated by barriers or separation. See attachment

Attachment (maximum one):
Separating-Freight-Bike-Travel-1.pdf

JCA comment #: 894

Leigh Anne and Phil Francis
Comments on Separating Freight and Bike Travel

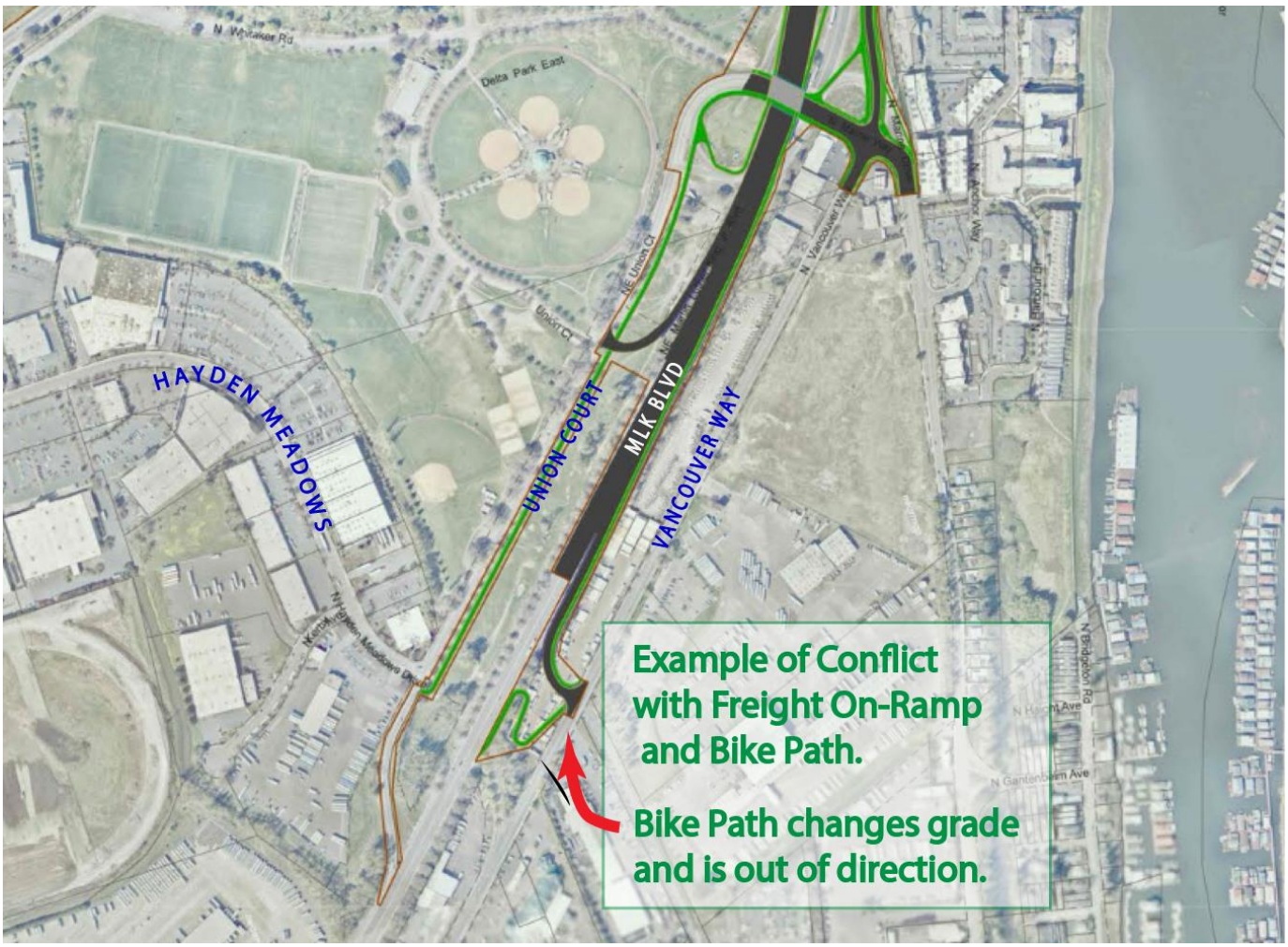
One important purpose and need of the IBR is to (c) improve highway freight mobility and address interstate travel and commerce needs in the Program area.

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:

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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.*

Respectfully,
Leigh Anne and Phil Francis

[redacted]

IBR Draft SEIS - RECORD #3537 DETAIL

First Name :	Valentyna
Last Name :	Schmidt
Attachments :	DSEIS_3537_Schmidt_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #3537 DETAIL

Submission Date :	11/19/2024
First Name :	Valentyna
Last Name :	Schmidt
Business/Organization/Agency :	

Submission Input :

Dear program developers,

The terrible transport situation on the Columbia River Bridge between Oregon and Washington has certainly improved, and it has existed for a long time and needs to be resolved as soon as possible. Unfortunately, I did not find any information on how replacing the bridge will improve the situation with transport capacity. In my opinion, given the rapid population growth in both states, it is necessary to leave the old bridge (historically unique) and build an additional, modern bridge, taking into account all the requirements of the near future.

With respect

Valentyna SchmidtWashington State

IBR Draft SEIS - RECORD #3538 DETAIL

First Name :	John
Last Name :	Talik
Attachments :	DSEIS_3538_Talik_Original.pdf (3 kb)

IBR Draft SEIS - RECORD #3538 DETAIL

Submission Date : 11/18/2024
First Name : John
Last Name : Talik
Business/Organization/Agency :

Submission Input :

First Name:
John

Last Name:
Talik

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
I’m disappointed to learn the unnecessary
freeway expansion is still being pursued. Please do not include expansion in this proposal. We don’t need more lanes!

I’m excited about aspects and proposals that would include Active transportation and public transport.

JCA comment #: 893

IBR Draft SEIS - RECORD #3539 DETAIL

First Name :	Leigh Anne and Phil
Last Name :	Francis
Attachments :	DSEIS3539_Francis_OG.pdf (114 kb)

IBR Draft SEIS - RECORD #3539 DETAIL

Submission Date :	11/18/2024
First Name :	Leigh Anne and Phil
Last Name :	Francis
Business/Organization/Agency :	Bridgeton Neighborhood Association
Attachments :	DSEIS_3539_Francis_Original.pdf (116 kb)

Submission Input :

First Name:
Leigh Anne and Phil

Last Name:
Francis

Business or Organization:
Bridgeton

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
Use the Interstate Bridge project to build the missing portion of the 40 Mile Loop

Attachment (maximum one):
Help-Build-the-40-Mile-Loop.pdf

JCA comment #: 892

Leigh Anne and Phil Francis
Comments on Building the Bridgeton Trail

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.



Th
Th

Respectfully,
Leigh Anne and Phil Francis
[redacted]

IBR Draft SEIS - RECORD #3540 DETAIL

First Name :	Thomas
Last Name :	Hickey
Attachments :	DSEIS-3540_Hickey_Original.pdf (506 kb)

IBR Draft SEIS - RECORD #3540 DETAIL

Submission Date :	11/19/2024
First Name :	Thomas
Last Name :	Hickey
Business/Organization/Agency :	
Attachments :	Separating Freight & Bike Travel.pdf (503 kb)

Submission Input :

*Interstate Bridge Replacement Program***

Via email ? draftseis@interstatebridge.org <mailto:draftseis@interstatebridge.org>

*

Dear IBR team,

I appreciate all of the hard work that has gone into designing and presenting the Draft SEIS to the public, and I wish you well in analyzing and assimilating all of the comments.

This document from the Bridgeton Neighborhood Association accurately expresses the issue at hand. The active transportation system throughout the North Portland project area needs to be designed to reflect best practices for safety and efficiency for both freight and users of the trail system. Rote adherence to generic regulations is not enough.

Yours,

Tom Hickey

North Portland advocate

IBR CAG; IBR Community Benefits Group

[redacted]

[redacted]

*

Separating Freight and Bike Travel
on the Marine Drive Interchange and On-Ramps

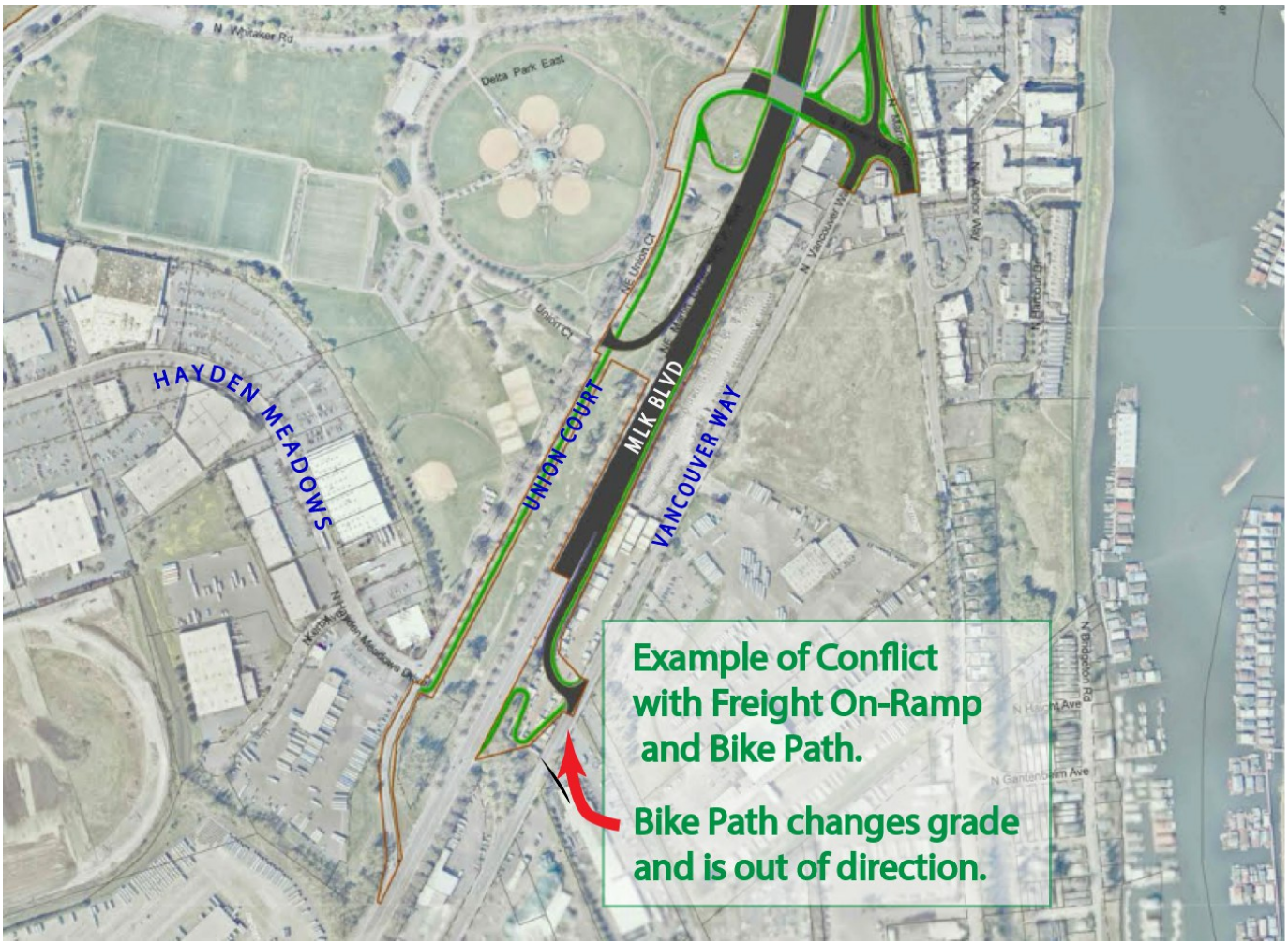
One important purpose and need of the IBR is to (c) improve highway freight mobility and address interstate travel and commerce needs in the Program area.

Another important purpose and need is to (b) improve connectivity, reliability, travel times, and operations of public transportation modal alternatives in the Program area.

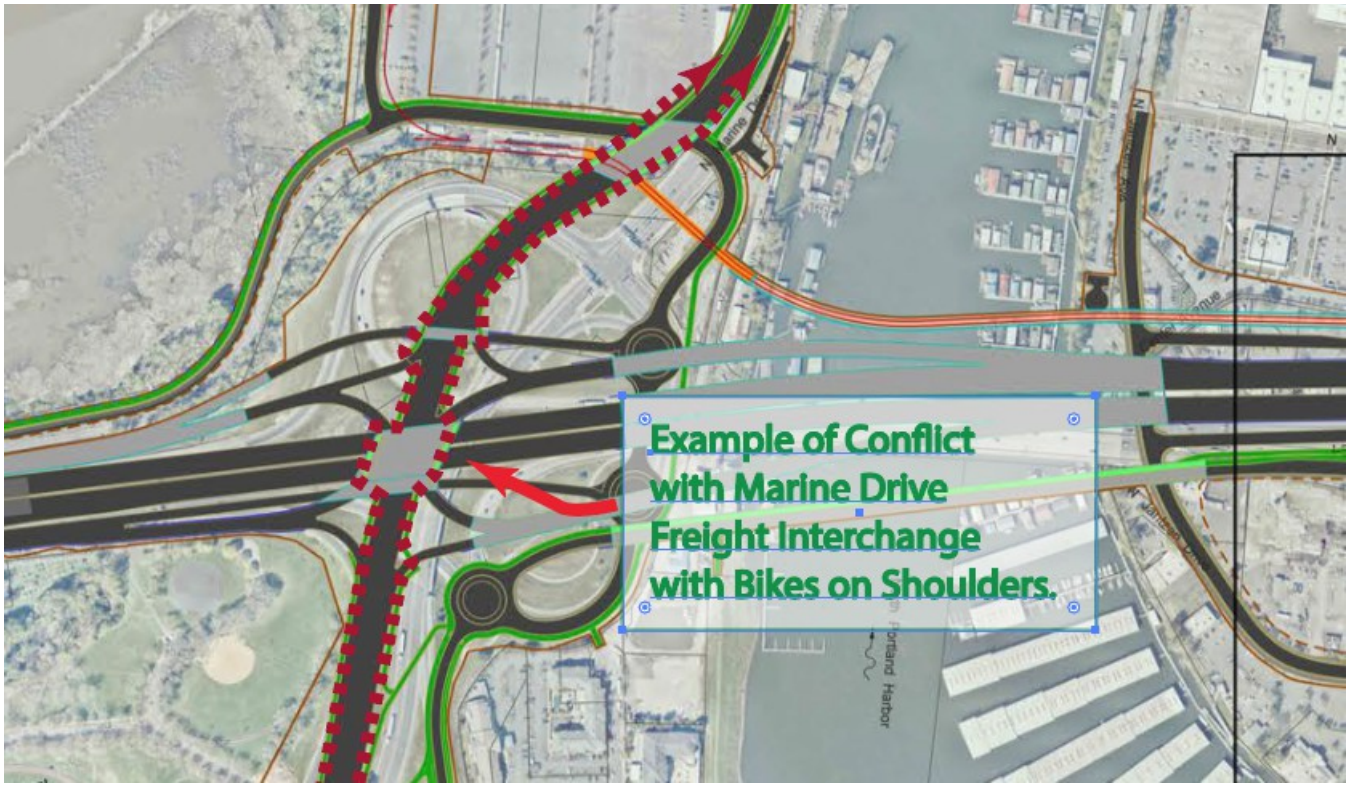
A way to meet the purpose and needs of both Freight Users and Active Transportation Users is to build active transportation routes physically separated from Freight routes as much as possible. Maximizing this separation is key to creating efficient Freight routes while creating safer, more attractive, 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.

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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

IBR Draft SEIS - RECORD #3541 DETAIL

First Name :	Jeff
Last Name :	Bledsoe
Attachments :	DSEIS_3541_Bledsoe_Original.pdf (2 kb)

IBR Draft SEIS - RECORD #3541 DETAIL

Submission Date : 11/19/2024
First Name : Jeff
Last Name : Bledsoe
Business/Organization/Agency :

Submission Input :

I am opposed to any new tolling in Oregon and plan to sign any petition that will help put a stop to tolling, permanently!

The cost numbers are just insanely bloated, a 50% increase in new bridge cost in just the last 11 months? That's just robbery. $1b/mile for light rail, are you all insane?

https://oregoncatalyst.com/81935-lars-larson-tolling-fix.html

NO NO NO to any new tolling in Oregon!!!

I plan to support IP-31 and any push to ban new tolling in Oregon.

Regards,
Jeff Bledsoe
[redacted]

[redacted]

IBR Draft SEIS - RECORD #3542 DETAIL

First Name :	Nicole
Last Name :	Perry
Attachments :	DSEIS_3542_Perry_Original.pdf (3 kb)

IBR Draft SEIS - RECORD #3542 DETAIL

Submission Date : 11/18/2024
First Name : Nicole
Last Name : Perry
Business/Organization/Agency :

Submission Input :

First Name:
Nicole

Last Name:
Perry

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
As the Clackamas County Safe Route to School Coordinator, I hear from families who have to travel all over the region for various reasons in a multitude of ways. The IBR project should consider multi-modal access and make it a safe place for an important crossing between states. Keeping connectivity for all road users while separating vulnerable ones from freight and vehicles is important. Reducing single occupancy vehicles is also important. With safe, efficient transit, walking, and rolling experiences some travelers will opt out of vehicles and feel better about doing so. Rightsizing this project and designing it well will help it be the success that it can be. The walking, biking, rolling, transit connections need to be considered at least as much as the roadway lanes.

JCA comment #: 891

IBR Draft SEIS - RECORD #3543 DETAIL

First Name :	Leigh Anne and Phil
Last Name :	Francis
Attachments :	DSEIS3543_Francis_OG.pdf (572 kb)

IBR Draft SEIS - RECORD #3543 DETAIL

Submission Date :	11/18/2024
First Name :	Leigh Anne and Phil
Last Name :	Francis
Business/Organization/Agency :	
Attachments :	DSEIS_3543_Francis_Original.pdf (341 kb)

Submission Input :

First Name:
Leigh Anne and Phil

Last Name:
Francis

Business or Organization:
Bridgeton

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
Make sure all Active Transportation pathsways are separated from Freight users. See attached document

Attachment (maximum one):
Separating-Freight-Bike-Travel.pdf

JCA comment #: 890

Leigh Anne and Phil Francis
Comments on Separating Freight and Bike Travel

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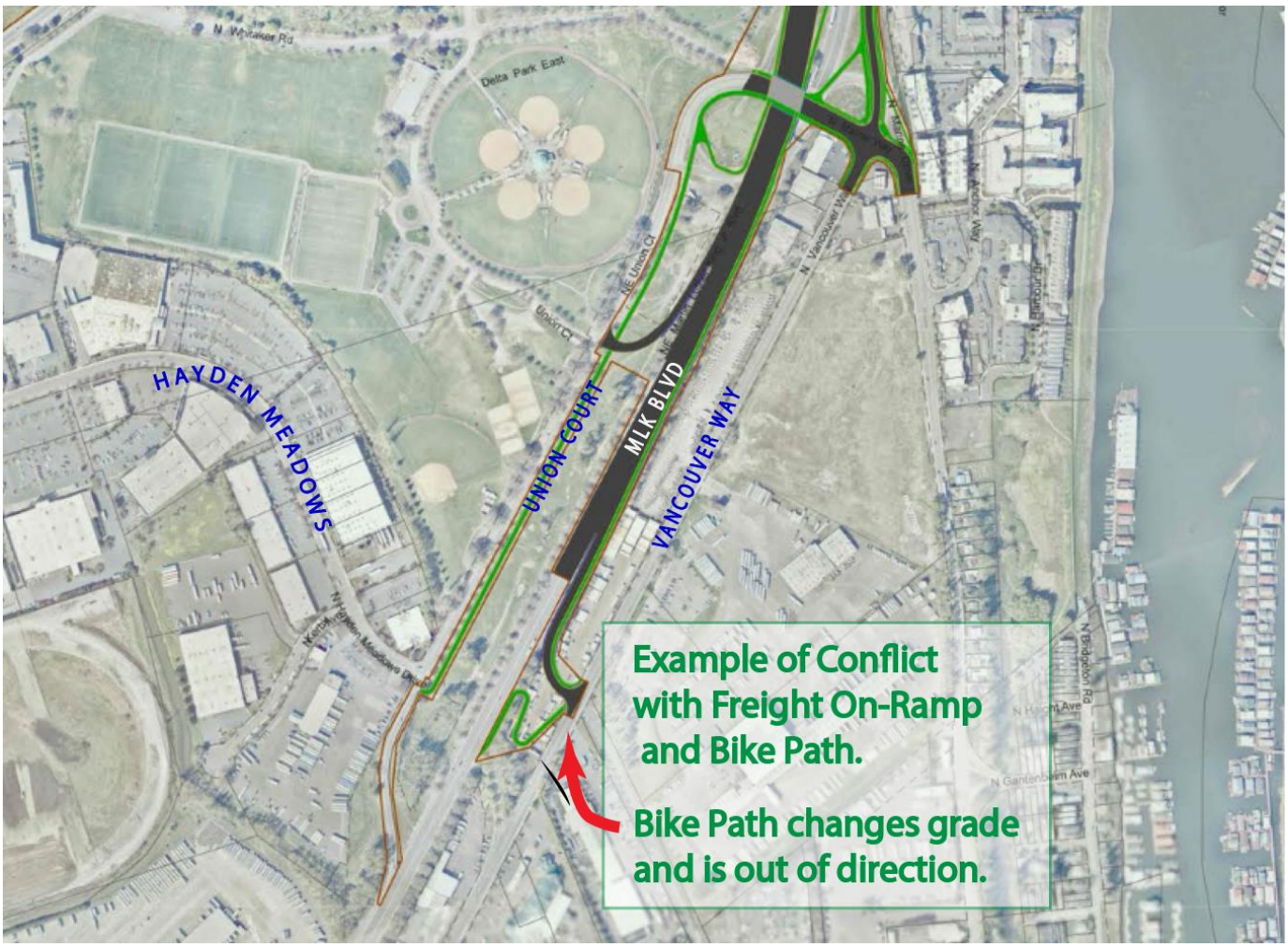

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Respectfully,
Leigh Anne and Phil Francis

[redacted]

IBR Draft SEIS - RECORD #3544 DETAIL

First Name :	Clare
Last Name :	Baxter
Attachments :	DSEIS-3544_Baxter_Original.pdf (2 mb)

IBR Draft SEIS - RECORD #3544 DETAIL

Submission Date :	11/19/2024
First Name :	Clare
Last Name :	Baxter
Business/Organization/Agency :	
Attachments :	DSEIS_3544_Baxter_Original.pdf (2 mb)

Submission Input :

Draft SEIS public comment - Water Access

Clare Baxter
Production Management
[redacted]

?

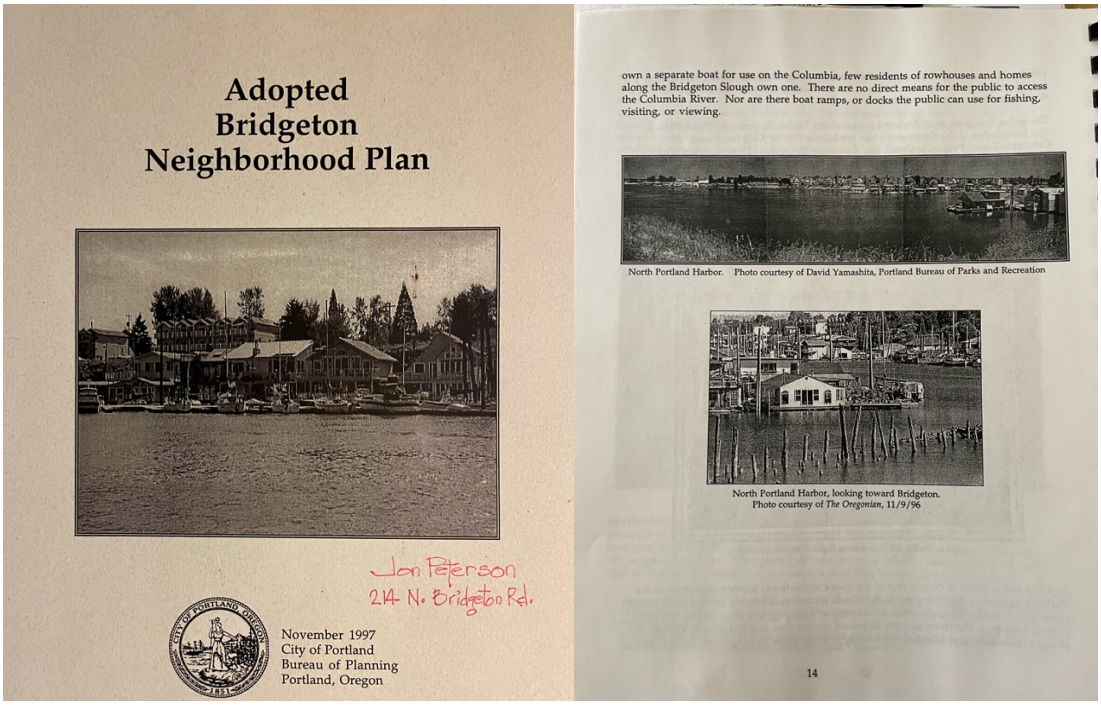
12 November 2024

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

[redacted]

IBR Draft SEIS - RECORD #3545 DETAIL

First Name :	Leigh Anne and Phil
Last Name :	Francis
Attachments :	DSEIS-3545_Francis_Original.pdf (153 kb) CommentsonCorkScrewRamps.pdf (171 kb)

IBR Draft SEIS - RECORD #3545 DETAIL

Submission Date :	11/18/2024
First Name :	Leigh Anne and Phil
Last Name :	Francis
Business/Organization/Agency :	Bridgeton
Attachments :	CommentsonCorkScrewRamps.pdf (171 kb)

Submission Input :

First Name:
Leigh Anne and Phil

Last Name:
Francis

Business or Organization:
Bridgeton

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
We need a better way for Active Transportation User will gain access to the Multi-use path. The cork screws ramps are not the best solution. See attachment

Attachment (maximum one):
Comments-on-Cork-Screw-Ramps.pdf

JCA comment #: 900

Leigh Anne and Phil Francis
Comments on Cork Screw Ramps

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.

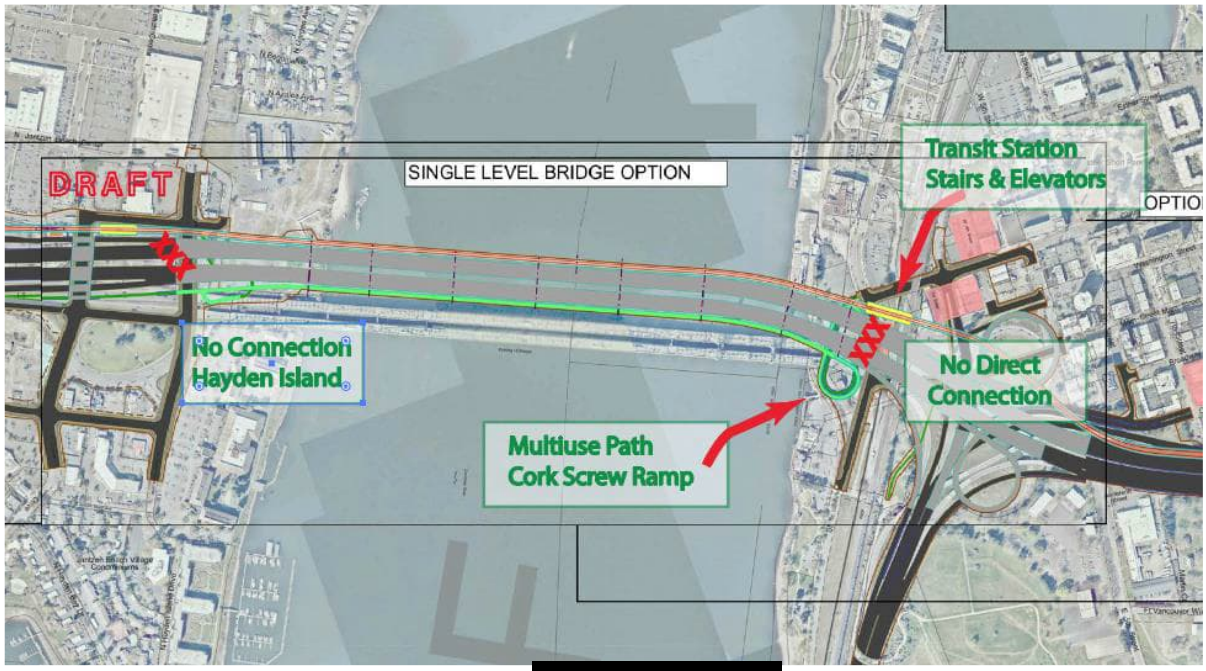
The multiuse path is built on the north bound main bridge span. The end point of the multiuse path on the Vancouver shoreline is approximately 100' in elevation above the ground and is access by a cork screw ramp of approx. ½ mile in length.

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.



Leigh Anne and Phil Francis
Comments on Cork Screw Ramps

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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.

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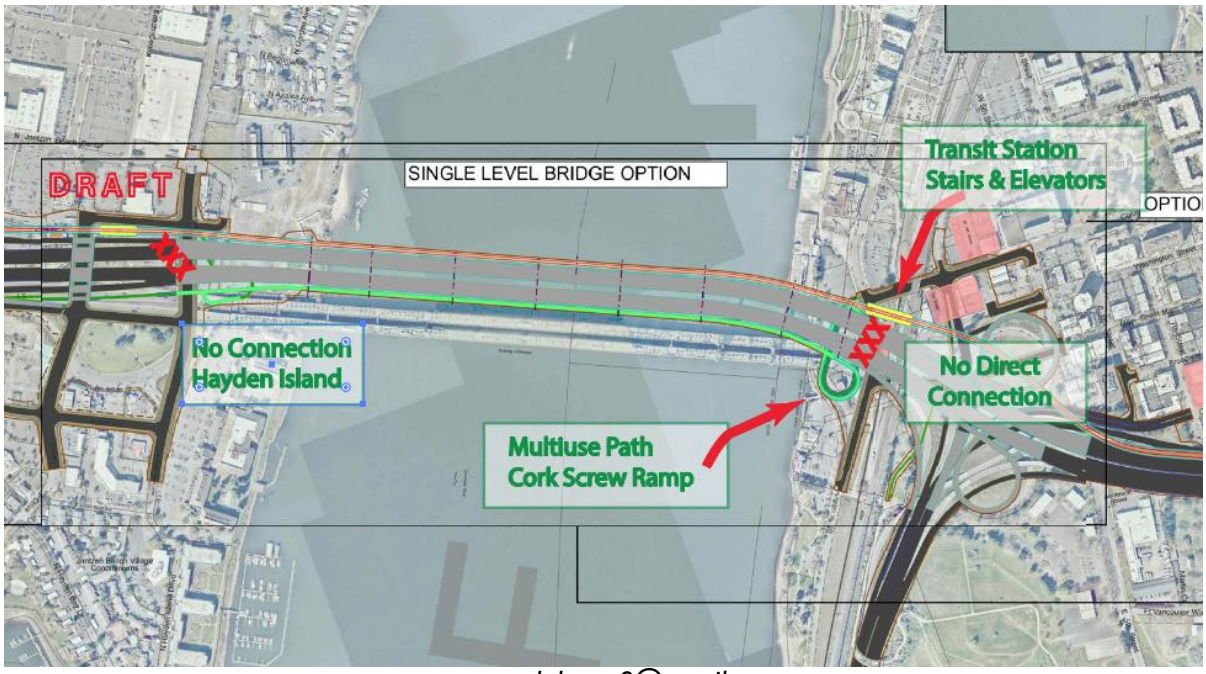


laleggs2@gmail.com

IBR Draft SEIS - RECORD #3546 DETAIL

First Name :	Shelly L.
Last Name :	Galbreth
Attachments :	Burnside_Original.pdf (304 kb) image001.png (456 bytes) image002.png (5 kb) Burnside Ct LLC Commons on IBR Draft SEIS.pdf (304 kb)

Schwabe

November 18, 2024

Maren L. Calvert
Admitted in Washington, Oregon, California and Hawaii
D: 360-597-0804
mcalvert@schwabe.com

VIA EMAIL: info@interstatebridge.org; ibr-row@interstatebridge.org; draftseis@interstatebridge.org

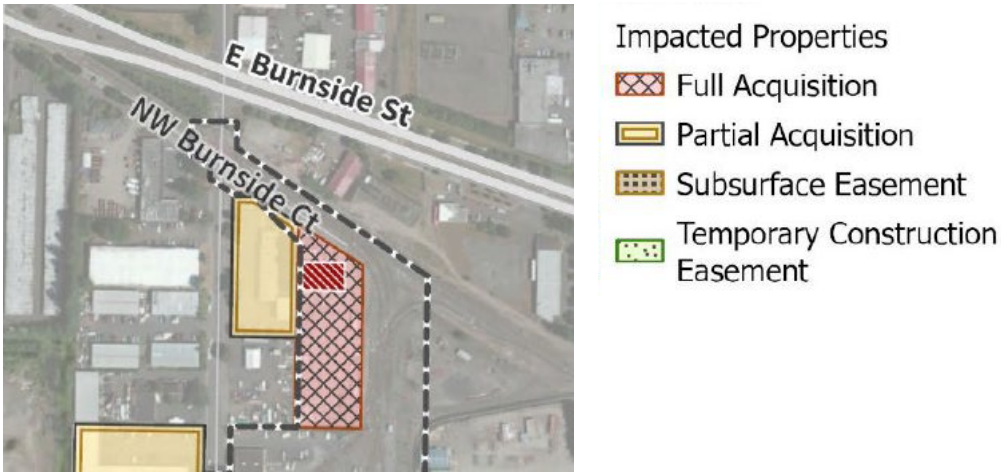
Interstate Bridge Replacement Program
Attn: Draft SEIS Public Comment
500 Broadway, Suite 200
Vancouver WA 98660

RE: Comments on the Draft Supplemental Environmental Impact Statement on behalf of 2410 NW Burnside Ct., LLC (Parcel No. R303180).

Dear Interstate Bridge Replacement Team:

This office represents 2410 NW Burnside Ct., LLC ("Burnside LLC") regarding real property it owns in Gresham, Washington that appears to be impacted by the Interstate Bridge Replacement project (hereinafter, "IBR"). This letter provides Burnside LLC's comments on the Draft Supplemental Environmental Impact Statement (hereinafter, "Draft SEIS").

Burnside LLC owns Parcel R303180. The property is mostly rectangular, and is identified in red in the excerpt of Figure 4-2 from the Draft SEIS, Land Use Technical Report below. As illustrated below, this property is slated for a full acquisition in the Draft SEIS.



My client is concerned that the Draft SEIS does not provide sufficient information to allow an accurate assessment of the environmental or financial impacts of the proposed acquisition. More specifically, the Draft SEIS does not explain why a full acquisition is necessary or when that acquisition would occur. Burnside LLC cannot even begin to analyze the impacts to its business from a full acquisition without knowing the order of operations, or having some idea of when the acquisition is proposed to occur. Moreover, the Draft SEIS does not adequately analyze the noise,

hazardous material, and wetlands/groundwater impacts of the proposed project. Without this information, Burnside LLC, the public, and approval authorities cannot accurately assess the environmental impacts of the project or potential alternatives to the project.

Land Use Impacts

The Draft SEIS fails to explain how or why the replacement of the I-5 bridge twenty miles away from Ruby Junction TriMet location requires the IBR project to acquire Burnside LLC's land. The Land Use Technical Report explains that TriMet intends to purchase 19 additional light rail vehicles ("LRV's"), and TriMet proposes to expand its maintenance facility and add a third track to Ruby Junction to accommodate them. Section 1.1.6.1. The Report, though, clearly shows that *none* of those proposed expansions require the demolition of Burnside LLC's building or require TriMet to use Burnside LLC's land.



The IBR may be proposing a full acquisition of Burnside LLC's land because it intends to close Burnside LLC's current driveway access to make way for a new TriMet building, identified with a blue star in the image to the left. This argument, though, fails to recognize that TriMet could provide a new access road to Burnside LLC's just as it is planning to provide for the existing and future new TriMet buildings in the area once the project closes NW Eleven Mile Ave. Land Use Tech. Rpt. Section 1.1.6.1. NEPA requires an environmental impact study to identify and consider alternatives. The IBR's failure to consider the feasibility, cost, and environmental impact of a new ingress/egress route as an alternative to full acquisition means the Draft SEIS does not meet NEPA requirements and must be revised.

Noise Impacts

The Noise and Vibration Technical Report does not analyze the potential for noise or vibration impacts to the Burnside LLC property. While this omission may be because the Burnside LLC property is slated for full acquisition, as explained above, that answer is not sufficient. It is not clear that full acquisition is required by the IBR project. If full acquisition is not required, then the Draft SEIS must consider the impacts of noise and vibration on Burnside LLC's land, current business, and future business. The Noise and Vibration Technical Report, therefore, does not meet NEPA's requirements.

Moreover, even if circumstances require the full acquisition of the Burnside LLC property, the Draft SEIS fails to explain *when* that acquisition would occur in relation to construction. If IBR

construction and maintenance activities begin prior to acquisition of the Burnside LLC property, the project could create noise and vibration impacts to Burnside LLC employee and business activities. The Draft SEIS fails to provide a timeline and thus fails to analyze these important issues.

Hazardous Materials Impacts

The Hazardous Materials Report § 5.4.4. and § 6.2.1.2. explains that the Ruby Junction expansion could disturb hazardous materials and encroach on nearby wetlands, potentially harming ecosystems and increasing risks to workers. Again, this analysis does not consider impacts to Burnside LLC from those activities.

The Report also lacks clear measures to protect the wetlands adjacent to the site and to manage hazardous materials safely. Demolition activities could release asbestos-containing materials and lead-based paint into the environment, posing health risks to workers and nearby businesses. The Report acknowledges these hazards in §§ 5.4.4 and 6.2.1.2, but does not sufficiently describe proposed containment procedures. Improper handling and disposal of hazardous waste, in addition to poor stormwater management, could result in long-term contamination of shallow aquifers, posing risks to local water quality and property values. The Hazardous Materials Technical Report identifies this concern (§ 6.2.3) but does not provide a detailed plan for long-term monitoring or waste inspection.

If hazardous materials and stormwater are not properly managed and Burnside LLC's property is NOT fully acquired, or if such activities begin before Burnside LLC's property is fully acquired, then Burnside LLC's employees and customers would be faced with health and business risks that the Draft SEIS has failed to consider. These hazardous materials and pollution concerns may also decrease the fair market value of Burnside LLC's property, constituting another form of uncompensated, unanalyzed government taking.

The Draft SEIS fails to report on the current environmental condition of Burnside LLC's property. This renders the Draft SEIS insufficient as a matter of law. Courts have repeatedly held that current environmental information is crucial to a proper environmental analysis. *See e.g. Half Moon Bay Fishermans' Mktg. Ass'n v. Carlucci,* 857 F.2d 505 (9th Cir. 1988). At a minimum, the IBR project should establish the current environmental condition of the Burnside LLC property and surrounding area and then propose potential avoidance and mitigation strategies from any future worsening of that baseline condition.

In sum, the Draft SEIS does not adequately analyze the environmental impacts of the proposed project and does not identify or analyze alternative actions in the Ruby Junction project area. The Draft SEIS does not identify unavoidable adverse environmental impacts or the secondary (indirect) and cumulative effects to Burnside LLC's property. This letter, therefore, 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 my client's concerns, to minimize the damages from the IBR project. 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

Schwabe

November 18, 2024

Maren L. Calvert
Admitted in Washington, Oregon, California and Hawaii
D: 360-597-0804
mcalvert@schwabe.com

VIA EMAIL: info@interstatebridge.org; ibr-row@interstatebridge.org; draftseis@interstatebridge.org

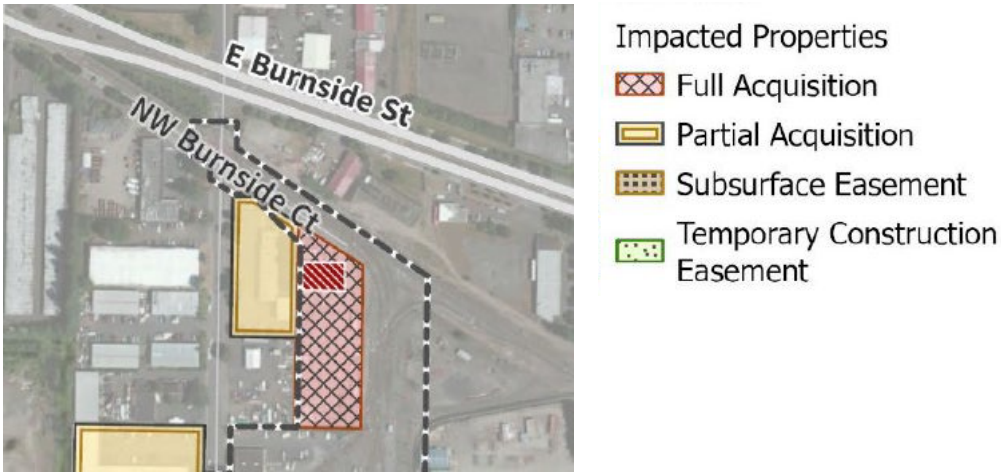
Interstate Bridge Replacement Program
Attn: Draft SEIS Public Comment
500 Broadway, Suite 200
Vancouver WA 98660

RE: Comments on the Draft Supplemental Environmental Impact Statement on behalf of 2410 NW Burnside Ct., LLC (Parcel No. R303180).

Dear Interstate Bridge Replacement Team:

This office represents 2410 NW Burnside Ct., LLC ("Burnside LLC") regarding real property it owns in Gresham, Washington that appears to be impacted by the Interstate Bridge Replacement project (hereinafter, "IBR"). This letter provides Burnside LLC's comments on the Draft Supplemental Environmental Impact Statement (hereinafter, "Draft SEIS").

Burnside LLC owns Parcel R303180. The property is mostly rectangular, and is identified in red in the excerpt of Figure 4-2 from the Draft SEIS, Land Use Technical Report below. As illustrated below, this property is slated for a full acquisition in the Draft SEIS.



My client is concerned that the Draft SEIS does not provide sufficient information to allow an accurate assessment of the environmental or financial impacts of the proposed acquisition. More specifically, the Draft SEIS does not explain why a full acquisition is necessary or when that acquisition would occur. Burnside LLC cannot even begin to analyze the impacts to its business from a full acquisition without knowing the order of operations, or having some idea of when the acquisition is proposed to occur. Moreover, the Draft SEIS does not adequately analyze the noise,

hazardous material, and wetlands/groundwater impacts of the proposed project. Without this information, Burnside LLC, the public, and approval authorities cannot accurately assess the environmental impacts of the project or potential alternatives to the project.

Land Use Impacts

The Draft SEIS fails to explain how or why the replacement of the I-5 bridge twenty miles away from Ruby Junction TriMet location requires the IBR project to acquire Burnside LLC's land. The Land Use Technical Report explains that TriMet intends to purchase 19 additional light rail vehicles ("LRV's"), and TriMet proposes to expand its maintenance facility and add a third track to Ruby Junction to accommodate them. Section 1.1.6.1. The Report, though, clearly shows that *none* of those proposed expansions require the demolition of Burnside LLC's building or require TriMet to use Burnside LLC's land.



The IBR may be proposing a full acquisition of Burnside LLC's land because it intends to close Burnside LLC's current driveway access to make way for a new TriMet building, identified with a blue star in the image to the left. This argument, though, fails to recognize that TriMet could provide a new access road to Burnside LLC's just as it is planning to provide for the existing and future new TriMet buildings in the area once the project closes NW Eleven Mile Ave. Land Use Tech. Rpt. Section 1.1.6.1. NEPA requires an environmental impact study to identify and consider alternatives. The IBR's failure to consider the feasibility, cost, and environmental impact of a new ingress/egress route as an alternative to full acquisition means the Draft SEIS does not meet NEPA requirements and must be revised.

Noise Impacts

The Noise and Vibration Technical Report does not analyze the potential for noise or vibration impacts to the Burnside LLC property. While this omission may be because the Burnside LLC property is slated for full acquisition, as explained above, that answer is not sufficient. It is not clear that full acquisition is required by the IBR project. If full acquisition is not required, then the Draft SEIS must consider the impacts of noise and vibration on Burnside LLC's land, current business, and future business. The Noise and Vibration Technical Report, therefore, does not meet NEPA's requirements.

Moreover, even if circumstances require the full acquisition of the Burnside LLC property, the Draft SEIS fails to explain *when* that acquisition would occur in relation to construction. If IBR

construction and maintenance activities begin prior to acquisition of the Burnside LLC property, the project could create noise and vibration impacts to Burnside LLC employee and business activities. The Draft SEIS fails to provide a timeline and thus fails to analyze these important issues.

Hazardous Materials Impacts

The Hazardous Materials Report § 5.4.4. and § 6.2.1.2. explains that the Ruby Junction expansion could disturb hazardous materials and encroach on nearby wetlands, potentially harming ecosystems and increasing risks to workers. Again, this analysis does not consider impacts to Burnside LLC from those activities.

The Report also lacks clear measures to protect the wetlands adjacent to the site and to manage hazardous materials safely. Demolition activities could release asbestos-containing materials and lead-based paint into the environment, posing health risks to workers and nearby businesses. The Report acknowledges these hazards in §§ 5.4.4 and 6.2.1.2, but does not sufficiently describe proposed containment procedures. Improper handling and disposal of hazardous waste, in addition to poor stormwater management, could result in long-term contamination of shallow aquifers, posing risks to local water quality and property values. The Hazardous Materials Technical Report identifies this concern (§ 6.2.3) but does not provide a detailed plan for long-term monitoring or waste inspection.

If hazardous materials and stormwater are not properly managed and Burnside LLC's property is NOT fully acquired, or if such activities begin before Burnside LLC's property is fully acquired, then Burnside LLC's employees and customers would be faced with health and business risks that the Draft SEIS has failed to consider. These hazardous materials and pollution concerns may also decrease the fair market value of Burnside LLC's property, constituting another form of uncompensated, unanalyzed government taking.

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In sum, the Draft SEIS does not adequately analyze the environmental impacts of the proposed project and does not identify or analyze alternative actions in the Ruby Junction project area. The Draft SEIS does not identify unavoidable adverse environmental impacts or the secondary (indirect) and cumulative effects to Burnside LLC's property. This letter, therefore, 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 my client's concerns, to minimize the damages from the IBR project. 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

IBR Draft SEIS - RECORD #3547 DETAIL

First Name :	Thomas
Last Name :	Hickey
Attachments :	DSEIS-3547_Hickey_Original.pdf (503 kb)

IBR Draft SEIS - RECORD #3547 DETAIL

Submission Date :	11/19/2024
First Name :	Thomas
Last Name :	Hickey
Business/Organization/Agency :	
Attachments :	The 40 Mile Loop Connections.pdf (498 kb)

Submission Input :

*Interstate Bridge Replacement Program***

Via email ? draftseis@interstatebridge.org <mailto:draftseis@interstatebridge.org>

*

Dear IBR team,

I appreciate all of the hard work that has gone into designing and presenting the Draft SEIS to the public, and I wish you well in analyzing and assimilating all of the comments.

This document from the Bridgeton Neighborhood Association accurately expresses the issue at hand. Closing the 40 Mile Loop bike trail along the IBR project area in an effective and thoughtful manner should be a core principle for the community benefits package.

Yours,

Tom Hickey

North Portland advocate

IBR CAG; IBR Community Benefits Group

[redacted]

[redacted]

*

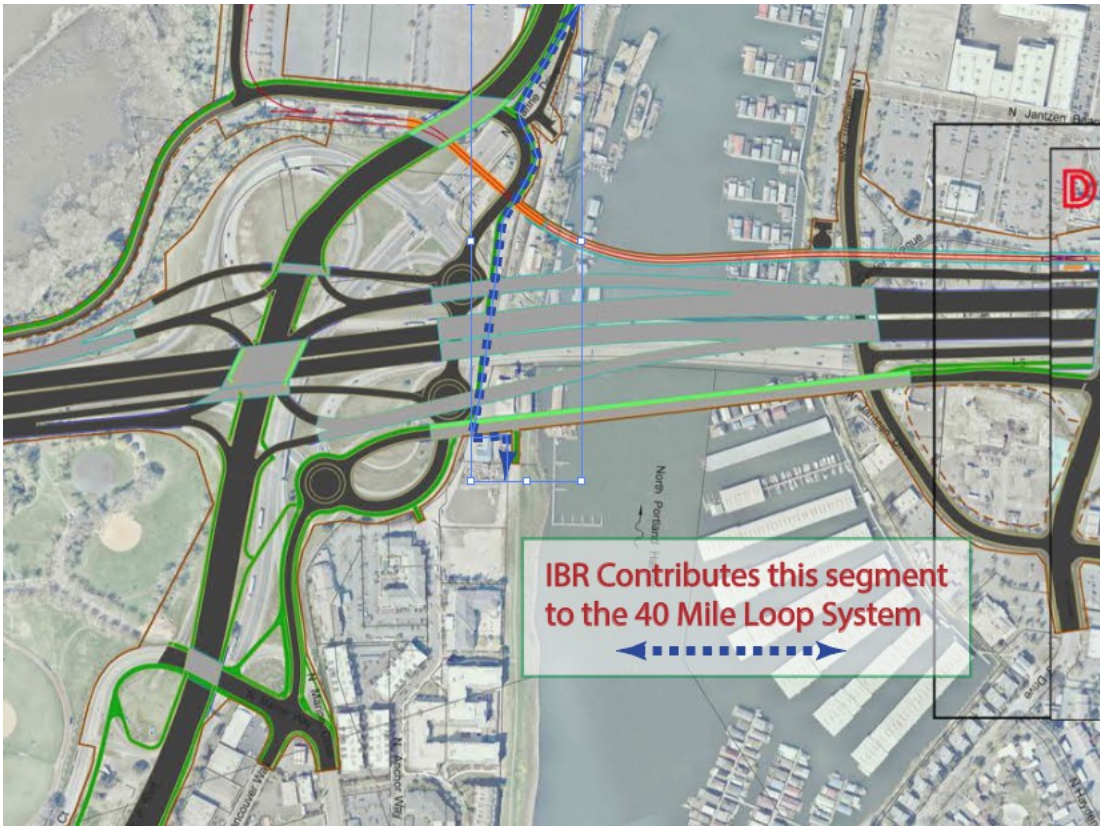
Comments on IBR Multi-Use path connections
to the 40-Mile Loop East/West Corridor

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.

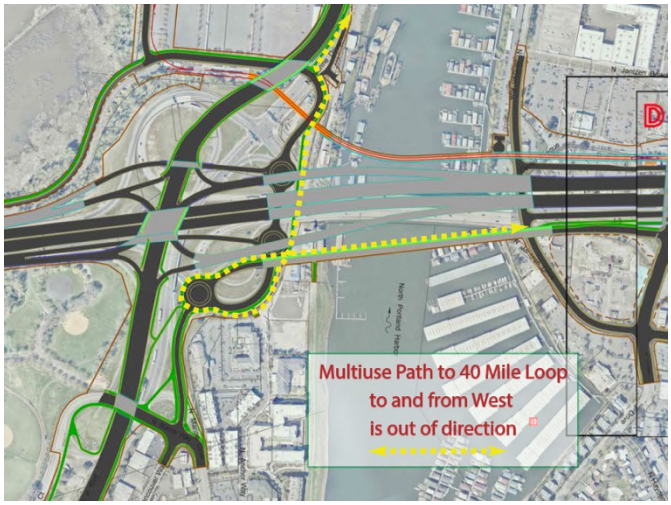
IBR Positive Contributions to the 40-Mile Loop Trail

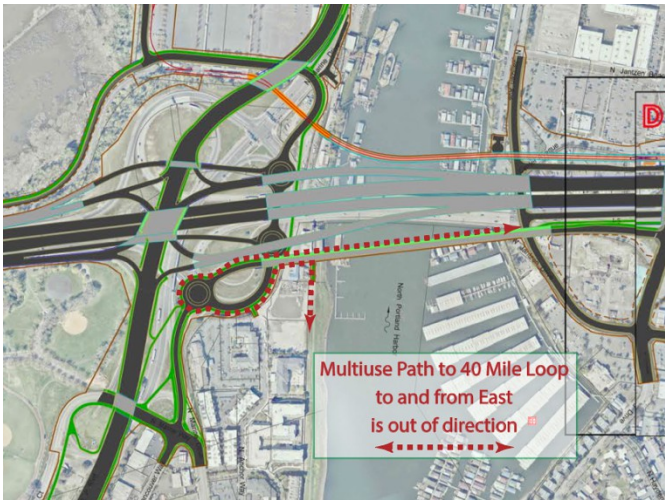
The IBR project will construct the segment of the 40-Mile Loop within the project area. This new trail segment will provide a safe, separated trail connecting the existing 40-Mile Loop trail located west of the proposed bridges through the project area, under the many new IBR bridges emanating from mainland 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

IBR Draft SEIS - RECORD #3548 DETAIL

First Name :	Patrick
Last Name :	Gilligan
Attachments :	DSEIS-3548_Gilligan_Original.pdf (9 kb) image001.png (2 kb)

IBR Draft SEIS - RECORD #3548 DETAIL

Submission Date :	11/19/2024
First Name :	Patrick
Last Name :	Gilligan
Business/Organization/Agency :	Lincoln Property Company

Submission Input :

Dear Interstate Bridge Replacement Project Team:

Thank you for the opportunity to comment on the Interstate Bridge Replacement project ("IBR") Draft Supplemental Environmental Impact Statement ("Draft SEIS"). As a developer, Lincoln Property Company understands and appreciates the effort the IBR has put into planning the bridge project thus far. We look forward to future iterations of the plans, as more information is provided to the IBR, so that it may develop a safe, functional, and aesthetically pleasing new bridge in the future.

The following comments are intended to ensure the IBR is aware of changes on the ground, to Vancouver Waterfront properties that have recently occurred and continue to occur. We believe these changes will impact the Draft SEIS analysis, requiring additional work.

As currently drafted, the IBR project proposes to shift the I-5 freeway to the west in a manner that significantly encroaches upon land owned by the Port of Vancouver. That land is not vacant as it may appear in historical documents. Much of that land is fully developed or planned to be developed in the very near future.

For example, Figure 4-4 of the Land Use Technical Report identifies all or parts of parcels 986057459, 986049316, and 4884000 for a temporary construction easement. Lincoln Property Company recently completed development on Parcels 986057459 and 986049316, providing office space to the City of Vancouver's largest employer, ZoomInfo. Parcel 4884000 provides mandatory secondary fire access to those new buildings. Thus, these parcels are not "vacant lots" as assumed in the Land Use Report, and are not reasonably available for temporary construction easements.

In addition, the Land Use Report identifies several Port parcels along the waterfront, adjacent to the proposed new bridge location, for partial acquisition and temporary construction easements. As we understand it, those parcels (986049315, 986049327, 502250000, 502246000, and 502245000) are all fully entitled. The Port, Lincoln Property Company, and other developers have spent hundreds of millions of dollars creating a vision for the Vancouver Waterfront-a vision the Draft SEIS recognizes and applauds. That vision includes development plans for these waterfront parcels. At least one of these parcels has been developed into a city park. The others are under lease, development agreements, or other contractual arrangements so that they are likely to be developed before the IBR project begins. Accordingly, the Draft SEIS should be updated to recognize these changed circumstances and to select different parcels for construction easements.

In addition, the partial acquisition of the Port's waterfront parcel will interfere with the Waterfront's access to water-borne vessel traffic, devaluing the entire waterfront's value. A waterfront's value to the community is significantly lessened of the waterfront cannot provide access to the water. The Draft SEIS does not adequately address this concern-perhaps because the Draft SEIS assumed these waterfront parcels were all vacant, and planned to remain that way. If so, that assumption is no longer valid.

If the IBR's proposed uses of the Port's parcels identified in this comment interferes with, delays, or prohibits planned development of the parcels, then the environmental impact to the neighborhood and the economy of the Vancouver Waterfront will be much more severe than the Draft SEIS recognizes.

Lincoln Property welcomes and looks forward to the installation of a light-rail station on the waterfront. That said, Lincoln Property Company is very concerned the proposal to delete the I-5 north C-Street off-ramp and the State Route 14 (SR-14) on-ramp at Columbia Street in all proposed designs. This will cause significant traffic congestion and cause a significant portion of Vancouver Waterfront customers to travel all the way up to the I-5/Mill Plain interchange, only to travel back south on city surface streets to reach the Waterfront. This is unfortunate and undesirable.

The situation gets even worse with the Modified LPA "without C Street" option, in which ALL C-Street on-/off-ramps are removed so that ALL I-5 and SR-14 traffic will be routed through the I-5/Mill Plain interchange. I-5 southbound in this area 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 worsen the problem, increasing the demand volume at the I-5/Mill Plain interchange "between 30% and 50%." Section 4.3.3.3. The Draft SEIS acknowledges "redirected trips...would lead to much higher delays across several intersections, as well as queuing and blocking issues" and yet the plans do not propose adequate mitigation or improvements to address these concerns.

Lincoln Property Company urgently requests that the IBR reconsider the C-Street access proposals and asks the IBR to conduct its mitigation analyses now. The two proposed Modified LPA options would be devastating to traffic, businesses, and residents in the Vancouver Downtown and Waterfront areas.

We hope the IBR will agree the information above warrants additional work on the Draft SEIS, to ensure it accurately identifies and analyzes the environmental impacts of the proposed project. Lincoln Property Company is available to discuss and provide additional information to achieve that goal.

Thank you for the opportunity to comment.

[cid:image001.png@01DB39E0.EB0C9710]
Patrick Gilligan
Senior Executive Vice President - Pacific Northwest & Mountain West
[redacted]
Lincoln Property Company
[redacted]

lpc.com<https://www.lpc.com/>

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IBR Draft SEIS - RECORD #3549 DETAIL

First Name :	Leigh Anne and Phil
Last Name :	Francis
Attachments :	DSEIS-3549_Francis_Original.pdf (80 kb) CommentsBridgeArchitecture.pdf (77 kb)

IBR Draft SEIS - RECORD #3549 DETAIL

Submission Date :	11/18/2024
First Name :	Leigh Anne and Phil
Last Name :	Francis
Business/Organization/Agency :	Bridgeton
Attachments :	CommentsBridgeArchitecture.pdf (77 kb)

Submission Input :

First Name:
Leigh Anne and Phil

Last Name:
Francis

Business or Organization:
Bridgeton

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
Please make sure the new Bridge Architecture is something the public will be proud of for the next 100 years.

Attachment (maximum one):
Comments-Bridge-Architecture.pdf

JCA comment #: 899

Leigh Anne and Phil Francis
Comments about Architectural Design

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 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.

Respectfully,
Leigh Anne and Phil Francis
[redacted]

Leigh Anne and Phil Francis
Comments about Architectural Design

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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 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.

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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.

Respectfully,
Leigh Anne and Phil Francis
173 NE Bridgeton Road Slip #6
Portland OR 97211
laleggs2@gmail.com

IBR Draft SEIS - RECORD #3550 DETAIL

First Name :	Mackenzie
Last Name :	Weintraub
Attachments :	DSEIS-3550_Weintraub_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #3550 DETAIL

Submission Date : 11/18/2024
First Name : Mackenzie
Last Name : Weintraub
Business/Organization/Agency :

Submission Input :

First Name:
Mackenzie

Last Name:
Weintraub

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
Hello,
I'm writing with concerns about the I-5 Bridge Replacement Program. At a time when our schools are underfunded, there is a housing shortage, and humans are unable to receive enough mental health and addiction resources, it doesn't feel like the right investment. Decades of research have shown that expanding freeways do not decrease traffic and only lead to more cars on the road. I would like to see a solution that

encourages faster mass transportation and safer ways for people to walk and bike instead of drive. We also know there is an equity concern here. Noise, pollution, traffic safety, and tolls all disproportionately affect historically marginalized communities. Please take my concerns into consideration in your planning adjustments.
Thank you,
Mackenzie Weintraub

JCA comment #: 898

IBR Draft SEIS - RECORD #3551 DETAIL

First Name :	Shelly L.
Last Name :	Galbreth
Attachments :	Broadway Investors_Original.pdf (407 kb) image001.png (456 bytes) image002.png (5 kb) Broadway Investors Comments on IBR.pdf (407 kb)

Schwabe

November 18, 2024

Maren L. Calvert
Admitted in Washington, Oregon, California and Hawaii
D: 360-597-0804
mcalvert@schwabe.com

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 Broadway Investors, LLC; 500 Broadway LLC; and Broadway Investors II, LLC (Parcel Nos. 38470002, 38470004, and 38430000).

Dear Interstate Bridge Replacement Team:

This office represents Broadway Investors, LLC; 500 Broadway LLC; and Broadway Investors II, LLC (collectively, the "Broadway Companies") regarding real property they own in Vancouver, Washington that appear to be impacted by the Interstate Bridge Replacement project ("IBR"). This letter provides their comments on the IBR's Draft Supplemental Environmental Impact Statement ("Draft SEIS").

Broadway Investors, LLC owns Parcel 38470002, which constitutes the commercial floors of the Umpqua Bank Building located at 500 Broadway Street, Vancouver, Washington. The property is identified with an "A" in the excerpt of Figure 4-4 from the Land Use Technical Report of the Draft SEIS in the image below.

500 Broadway LLC owns Parcel 38470004, identified as "B" in the image below. Parcel B contains a commercial garage (the "Broadway Garage") adjacent to the Umpqua Bank Building and provides parking for Umpqua Bank Building (both commercial businesses and residential condos), The Hudson building, and the surrounding community.



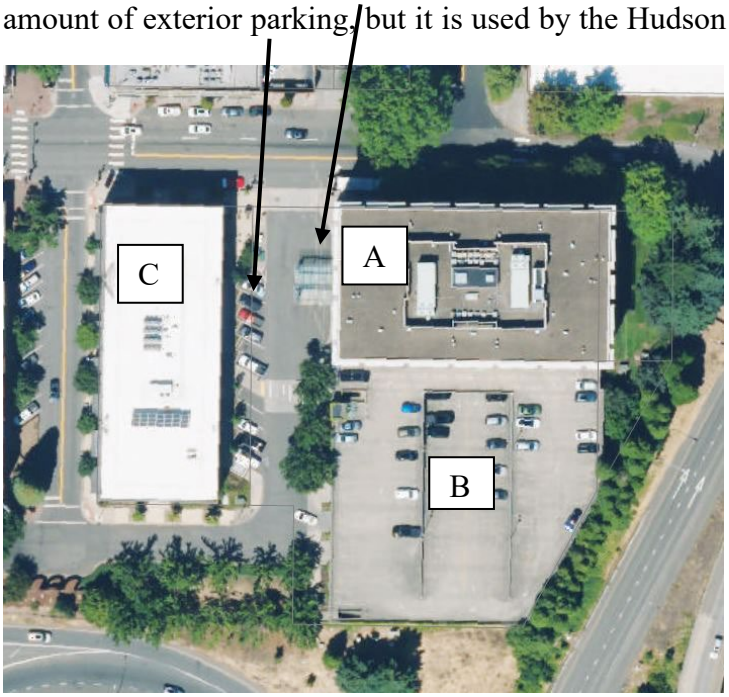
Broadway Investors II, LLC owns Parcel 3843000 which contains "The Hudson" building. The Hudson is identified with a "C" in the image above. All three properties and the private street between them are identified as temporary construction easement sites in the Draft SEIS. The private street between the buildings is on property owned by Parcels A, B, and all the other condominium owners of property located at 500 Broadway Street, Vancouver Washington

The Broadway Companies are concerned that the Draft SEIS does not provide sufficient information or analysis of the land use, visual, transportation, neighborhood, or noise impacts to their properties.

Land Use Impacts

The Land Use Technical Report does not explain the duration or start and end dates of the proposed easement. It does not explain what types of construction vehicles or construction materials are intended to be stored on the properties. Without this information, the Broadway Companies (and the IBR decision-makers) cannot properly assess whether the proposed use will leach hazardous chemicals into the ground, release noxious vapors into the air, cause undue noise disturbance, interfere with transportation, or cause any other negative environmental impacts.

Section 1.2.2 of the Transportation Technical Report says temporary construction easements will be located on vacant parcels. As discussed above, however, the Broadway Companies' properties are not vacant. The Umpqua Bank Building (Parcel A) and The Hudson building (Parcel C) do not have interior open spaces that would easily facilitate construction storage. The Umpqua Bank Building (Parcel A) has a bank drive through space that might be usable for parking or construction storage, but that space is quite small (see image below). The Hudson (Paracel C) has a limited amount of exterior parking, but it is used by the Hudson employees and customers. If the IBR is proposing to close the private street between the buildings, the Draft SEIS does not adequately explain why the IBR could not close a different, underutilized *public* street, instead.



If the IBR project proposes to close the Broadway Garage (Parcel B), the commercial and residential floors of the Umpqua Bank Building (Parcel A) and The Hudson (Parcel C) will lose nearly all of their owner, customer, and employee parking. The public would also suffer from the loss of public parking stalls in the Broadway Garage. If the street, outdoor parking, and/or indoor parking are closed by the IBR, then the "temporary" easement could

have devastating financial impacts on all three Broadway Companies' businesses and the community for several years.

Visual Impacts

In addition to hazardous materials, noxious odors, noise, and parking concerns, the Broadway Companies are also concerned the proposed construction will have significant visual impacts on their buildings. The Draft SEIS identifies 42 key viewpoints ("KVPs"), rates them, then analyzes the view impacts on those locations only. The Broadway Companies' properties ae not named as a KVP, thus, the impact on them has not been specifically identified or analyzed. KVPs 28 and 29 in Figure 3-2 and Table 3-2 of the Visual Impact Technical Report are close, but they are inadequate. KVP 28 is on Columbia Street at Esther Short Park, four blocks away from I-5. KVP 29 is on SR 14 at I-15, representing the view as a motorist, looking southeast. Neither of these locations are representative of the Broadway Companies' buildings, which are immediately adjacent to the proposed, elevated SR-14 to I-5 on-ramp and elevated freeway. Their current views to the southeast will be completely obliterated. Thus, the rating factors in Table 4-10 of the Visual Quality Technical Report do not adequately reflect the existing or the future visual qualities of the Broadway Companies' properties.

The Broadway Companies have already lost potential tenant(s) due to the threat of the bridge project. The failure of the Draft SEIS to adequately identify, analyze, and mitigate visual, noise, and transportation impacts on the Broadway Companies ensures those financial losses will continue, unnecessarily increasing the negative impact and burden of the government taking.

Transportation Impacts

In addition to these specific direct impacts, the Broadway Companies are concerned about the impacts to their properties and downtown Vancouver from the proposal to close the C-Street on- and off-ramps.

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 ("Modified LPA") and Option B ("Modified LPA w/o C Street") – as they are called on the roll map.[1] The Report admits that 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. The report also admits I-5 southbound in Washington currently does not meet WSDOT's mobility standard for three of the four AM peak hours. It also admits this causes traffic to "routinely spill[] 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. Because IBR project does not propose any notable improvements to the I-5/Mill Plain interchange or the surrounding streets (section 1.1.5.1), the "redirected trips…would lead to much higher delays across several intersections, as well as queuing and blocking issues through

[1] Option A on the 3-23 roll map available at: https://www.interstatebridge.org/media/oimnr2rn/mlpa-roll-map-5-23-23-version.pdf, appears to be a depiction of the "Modified LPA" described in the Draft SEIS. Option B appears to illustrate the "Modified LPA without C-Street" alternative described in the Draft SEIS.

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 those problems.

Instead, the Draft SEIS simply says mitigation in Downtown and Upper Vancouver "may be required." Transp. Tech. Report Section 7.1.6. That is insufficient. To make matters worse, the Report also admits that while "[t]he Final SEIS and ROD will include all mitigation commitments that have been finalized by the time of publication…**some mitigation measures may not be finalized until later in the project design process**." Section 7.1.6 (emphasis added). In other words, the IBR project does not know how it will solve the transportation problems it knows it will cause, and it is planning to figure it out (or ignore it) on the fly. That deprives the public of an opportunity to comment and participate and does not meet NEPA requirements to sufficiently analyze impacts and identify satisfactory mitigation.

Neighborhood Impacts

As noted in section 3.3.8.1 of the Neighborhood and Populations Technical Report (the "Neighborhood Report"), Esther Short includes Vancouver's downtown core. There are a mix of commercial development, industry, residential development, and mixed-use developments. The neighborhood has a higher percentage of Black, Indigenous, and unhoused residents than elsewhere in Vancouver. Esther Short has a 45% disability rate and qualifies as an Environmental Justice Community. Many families are below the poverty line and do not have the option of moving elsewhere to avoid noise, loss of views, encumbered traffic patterns, and more.

Table 4-2 of the Neighborhood Report claims the proposed project is consistent with the Esther Short neighborhood goals, but the Report fails to demonstrate the accuracy (or falsity) of that statement. This wrongfully states that displacements of apartment complexes and businesses, however few, will not be a notable effect on an already impoverished and densely-populated neighborhood but provides no indication of how or where those impoverished, underrepresented, and/or disabled populations will actually relocate or whether adjustments to such relocations are even reasonably feasible.

Noise Impacts

The Noise & Vibration Technical Report (the "Noise Report") also does not adequately analyze impacts to my clients' properties. Section 4.4.10.1 acknowledges that the IBR project noise levels are expected to increase in the Esther Short neighborhood – including noise level increases in areas *already exceeding* FHWA Noise Abatement Criteria. For businesses attempting to attract customers, and residential complexes trying to attract tenants, the Report gives no attention to the economic and cultural hardships such additional noise will cause.

Moreover, the Report expressly discusses the need for mitigation for the Econo Lodge located at **601** Broadway Street (Section 7.8.1) and nearby apartments, but completely ignores the noise impacts at **500** Broadway Street, which is even closer to and surrounded on two sides by the freeway and the on/off ramps. My clients' properties (which also have a residential component,

although we do not represent them) will experience even more noise and vibration than the Econo Lodge. The Draft SEIS's failure to analyze and address this, means the Draft SEIS must be revised.

In sum, the Draft SEIS does not adequately analyze the environmental impacts of the "proposed and alternative actions" 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. This letter identifies significant information relevant to environmental concerns that bear on the IBR project, 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 my clients 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

139474\272302\46818642.v5

Schwabe

November 18, 2024

Maren L. Calvert
Admitted in Washington, Oregon, California and Hawaii
D: 360-597-0804
mcalvert@schwabe.com

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 Broadway Investors, LLC; 500 Broadway LLC; and Broadway Investors II, LLC (Parcel Nos. 38470002, 38470004, and 38430000).

Dear Interstate Bridge Replacement Team:

This office represents Broadway Investors, LLC; 500 Broadway LLC; and Broadway Investors II, LLC (collectively, the "Broadway Companies") regarding real property they own in Vancouver, Washington that appear to be impacted by the Interstate Bridge Replacement project ("IBR"). This letter provides their comments on the IBR's Draft Supplemental Environmental Impact Statement ("Draft SEIS").

Broadway Investors, LLC owns Parcel 38470002, which constitutes the commercial floors of the Umpqua Bank Building located at 500 Broadway Street, Vancouver, Washington. The property is identified with an "A" in the excerpt of Figure 4-4 from the Land Use Technical Report of the Draft SEIS in the image below.

500 Broadway LLC owns Parcel 38470004, identified as "B" in the image below. Parcel B contains a commercial garage (the "Broadway Garage") adjacent to the Umpqua Bank Building and provides parking for Umpqua Bank Building (both commercial businesses and residential condos), The Hudson building, and the surrounding community.



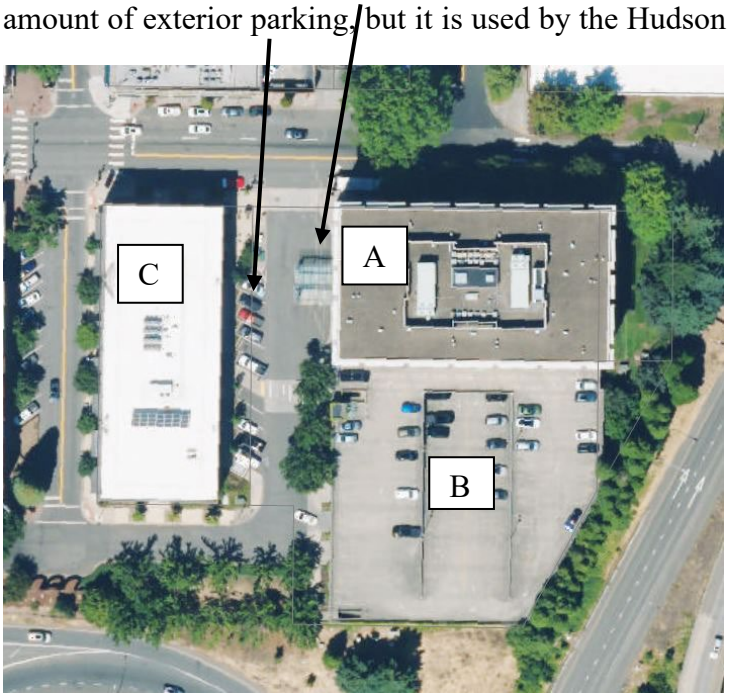
Broadway Investors II, LLC owns Parcel 3843000 which contains "The Hudson" building. The Hudson is identified with a "C" in the image above. All three properties and the private street between them are identified as temporary construction easement sites in the Draft SEIS. The private street between the buildings is on property owned by Parcels A, B, and all the other condominium owners of property located at 500 Broadway Street, Vancouver Washington

The Broadway Companies are concerned that the Draft SEIS does not provide sufficient information or analysis of the land use, visual, transportation, neighborhood, or noise impacts to their properties.

Land Use Impacts

The Land Use Technical Report does not explain the duration or start and end dates of the proposed easement. It does not explain what types of construction vehicles or construction materials are intended to be stored on the properties. Without this information, the Broadway Companies (and the IBR decision-makers) cannot properly assess whether the proposed use will leach hazardous chemicals into the ground, release noxious vapors into the air, cause undue noise disturbance, interfere with transportation, or cause any other negative environmental impacts.

Section 1.2.2 of the Transportation Technical Report says temporary construction easements will be located on vacant parcels. As discussed above, however, the Broadway Companies' properties are not vacant. The Umpqua Bank Building (Parcel A) and The Hudson building (Parcel C) do not have interior open spaces that would easily facilitate construction storage. The Umpqua Bank Building (Parcel A) has a bank drive through space that might be usable for parking or construction storage, but that space is quite small (see image below). The Hudson (Paracel C) has a limited amount of exterior parking, but it is used by the Hudson employees and customers. If the IBR is proposing to close the private street between the buildings, the Draft SEIS does not adequately explain why the IBR could not close a different, underutilized *public* street, instead.



If the IBR project proposes to close the Broadway Garage (Parcel B), the commercial and residential floors of the Umpqua Bank Building (Parcel A) and The Hudson (Parcel C) will lose nearly all of their owner, customer, and employee parking. The public would also suffer from the loss of public parking stalls in the Broadway Garage. If the street, outdoor parking, and/or indoor parking are closed by the IBR, then the "temporary" easement could

have devastating financial impacts on all three Broadway Companies' businesses and the community for several years.

Visual Impacts

In addition to hazardous materials, noxious odors, noise, and parking concerns, the Broadway Companies are also concerned the proposed construction will have significant visual impacts on their buildings. The Draft SEIS identifies 42 key viewpoints ("KVPs"), rates them, then analyzes the view impacts on those locations only. The Broadway Companies' properties ae not named as a KVP, thus, the impact on them has not been specifically identified or analyzed. KVPs 28 and 29 in Figure 3-2 and Table 3-2 of the Visual Impact Technical Report are close, but they are inadequate. KVP 28 is on Columbia Street at Esther Short Park, four blocks away from I-5. KVP 29 is on SR 14 at I-15, representing the view as a motorist, looking southeast. Neither of these locations are representative of the Broadway Companies' buildings, which are immediately adjacent to the proposed, elevated SR-14 to I-5 on-ramp and elevated freeway. Their current views to the southeast will be completely obliterated. Thus, the rating factors in Table 4-10 of the Visual Quality Technical Report do not adequately reflect the existing or the future visual qualities of the Broadway Companies' properties.

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Best regards,

SCHWABE, WILLIAMSON & WYATT, P.C.



Maren L. Calvert

MLCA:slg

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IBR Draft SEIS - RECORD #3552 DETAIL

First Name :	Leigh Anne and Phil
Last Name :	Francis
Attachments :	DSEIS-3552_Francis_Original.pdf (147 kb) FreightBikesonMarineDr.pdf (144 kb)

IBR Draft SEIS - RECORD #3552 DETAIL

Submission Date :	11/18/2024
First Name :	Leigh Anne and Phil
Last Name :	Francis
Business/Organization/Agency :	Bridgeton
Attachments :	FreightBikesonMarineDr.pdf (144 kb)

Submission Input :

First Name:
Leigh Anne and Phil

Last Name:
Francis

Business or Organization:
Bridgeton

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
Study ways for the Bike Lanes on Marine Drive to be built safely as active Transportation Users travel Marine Drive. See Attachment

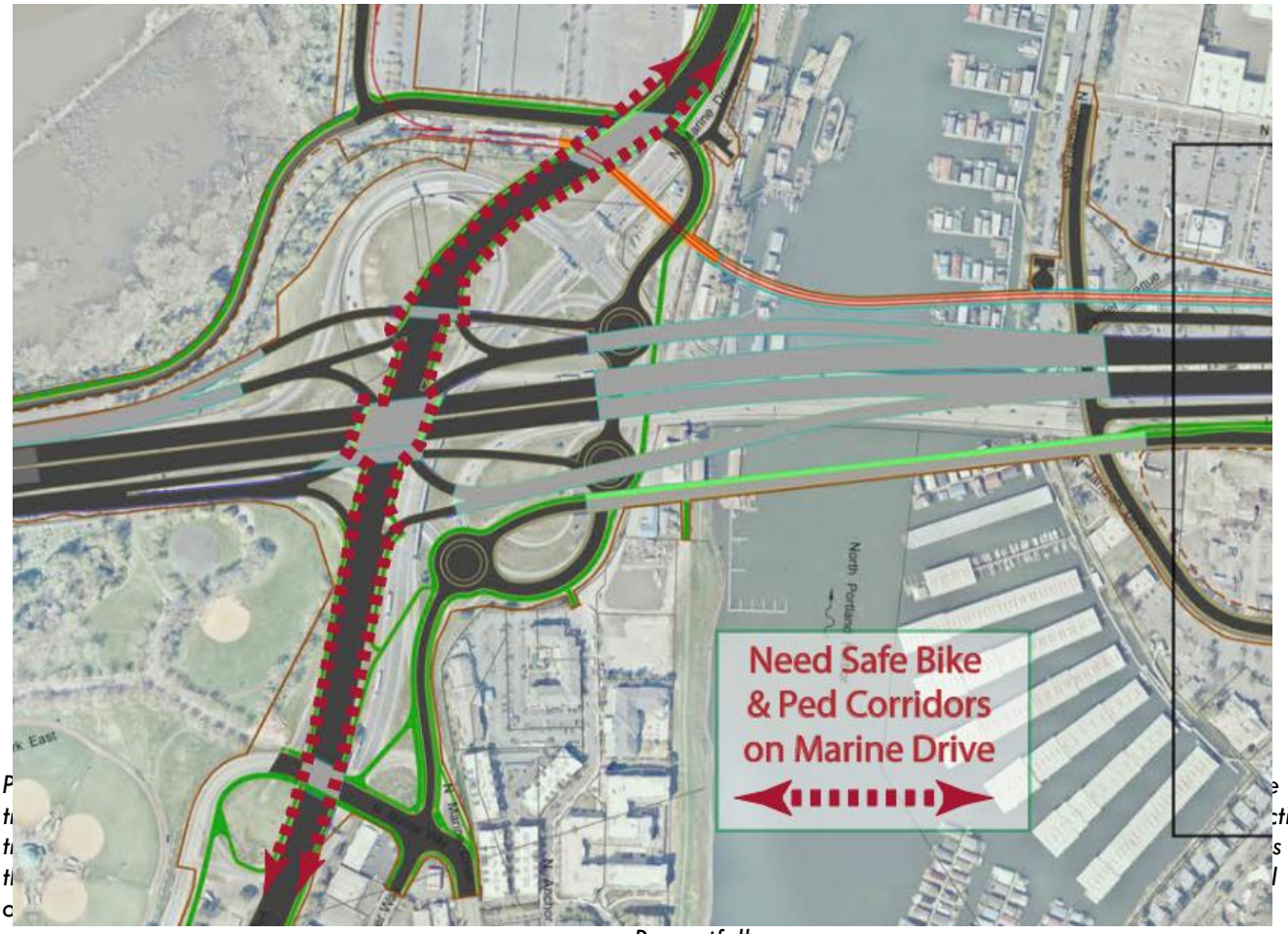
Attachment (maximum one):
Freight-Bikes-on-Marine-Dr.pdf

JCA comment #: 897

Leigh Anne and Phil Francis
Comments on FREIGHT and BIKE CONFLICTS

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.



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Respectfully,
Leigh Anne and Phil Francis

[redacted]

Leigh Anne and Phil Francis
Comments on FREIGHT and BIKE CONFLICTS

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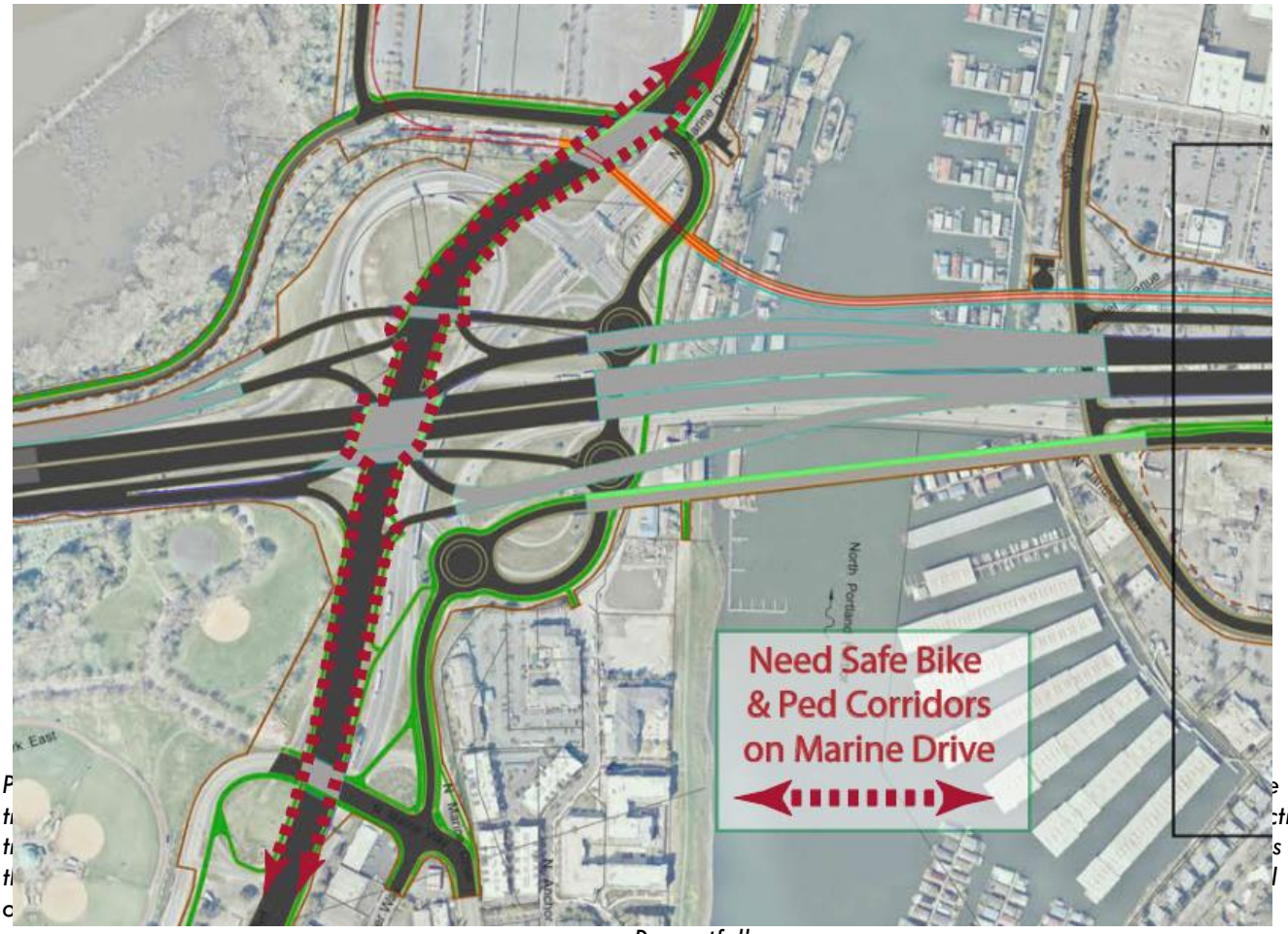

P e
t ctive
t s crossing
t l to change
c

Respectfully,
Leigh Anne and Phil Francis
173 NE Bridgeton Road Slip #6
Portland OR 97211
laleggs2@gmail.com

IBR Draft SEIS - RECORD #3554 DETAIL

First Name :	Steven
Last Name :	Demarest
Attachments :	DSEIS-3554_Demarest_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #3554 DETAIL

Submission Date : 11/18/2024
First Name : Steven
Last Name : Demarest
Business/Organization/Agency :

Submission Input :

First Name:
Steven

Last Name:
Demarest

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
The proposed plan is not good for active transportation. Under the plan, light rail access is separated from the pedestrian/bike path access, making it harder to use both. The 100 foot tower is not feasible for many users.

JCA comment #: 974

IBR Draft SEIS - RECORD #3555 DETAIL

First Name :	Ann
Last Name :	Dodds
Attachments :	DSEIS-3555_Dodds_Original_Redacted.pdf (3 kb)

IBR Draft SEIS - RECORD #3555 DETAIL

Submission Date : 11/18/2024
First Name : Ann
Last Name : Dodds
Business/Organization/Agency :

Submission Input :

First Name:
Ann

Last Name:
Dodds

Email:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
Having multi modal design is very important for the new bridge. Combining access points for active users and transit users makes good sense for safety of all non motor vehicle users.

JCA comment #: 973

IBR Draft SEIS - RECORD #3557 DETAIL

First Name :	Jeremiah
Last Name :	Via
Attachments :	DSEIS-3557_Via_Original_Redacted.pdf (4 kb)

IBR Draft SEIS - RECORD #3557 DETAIL

Submission Date : 11/18/2024
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:
Air Quality

Comment:
This plan will create more pollution in Portland and make those who live in the impact zone haver shorter, sicker lives. Please right this project to be a bridge replacement only with no additional highway lanes.

JCA comment #: 972

IBR Draft SEIS - RECORD #3558 DETAIL

First Name :	Elisabeth
Last Name :	Blizzard
Attachments :	DSEIS-3558_Blizzard_Original_Redacted.pdf (5 kb)

IBR Draft SEIS - RECORD #3558 DETAIL

Submission Date : 11/18/2024
First Name : Elisabeth
Last Name : Blizzard
Business/Organization/Agency :

Submission Input :

First Name:
Elisabeth

Last Name:
Blizzard

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
Thank you for this opportunity to add my voice to those who are concerned about the proposed Interstate Bridge Replacement.

I am concerned that the proposed design does not provide safe and efficient routes for non-motorized traffic – and I urge you to rectify these shortcomings in the final design.

We know – from years of experience not only in the greater Portland region, but worldwide – that people will not routinely use non-motorized forms of transportation unless they are safe and convenient. Yet for decades we have designed and built our transportation system to make vehicle travel safe and convenient, usually at the expense of providing safe and convenient travel options for those who choose not to – or cannot afford to – drive. This project gives us the perfect opportunity to change that approach, and in so doing, encourage people to leave their cars behind.

We know how to make bicycling (for example) safer and more convenient; years of investment in our region's bicycle network has not only seen greater bicycle use, but has enabled us to increase travel across the Hawthorne Bridge without destroying valuable downtown real estate by rebuilding the bridge to accommodate more vehicle lanes of travel. In cities across the world, designing and redesigning streets to encourage more non-motorized travel has enhanced urban and suburban neighborhoods, reduced vehicle miles traveled, and helped reduce deadly carbon emissions that contribute to climate change.

The replacement of the Interstate Bridge is the perfect opportunity to demonstrate a better way to make sure we are moving our transportation system, our region, and our climate in the right direction. Let's make the most of it.

Sincerely,
Elisabeth (Meeky) Blizzard
[redacted]

JCA comment #: 971

IBR Draft SEIS - RECORD #3559 DETAIL

First Name :	Laura
Last Name :	Feldman
Attachments :	DSEIS-3559_Feldman_Original_Redacted.pdf (4 kb)

IBR Draft SEIS - RECORD #3559 DETAIL

Submission Date : 11/18/2024
First Name : Laura
Last Name : Feldman
Business/Organization/Agency :

Submission Input :

First Name:
Laura

Last Name:
Feldman

Business or Organization:
Community member, Portsmouth neighborhood

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
No freeway expansion: that is the PAST! ODOT and WDOT need to support the bridge repair that include

future forms of transportaton. Fossil fuel going away, as will single occupany transport. ODOT needs to repair the bridge--seismicc replacement, lgiht raill extension and bike and pedestrian immprovements. Freeway expansion would be a nightmare for people living and moving through this region.

JCA comment #: 970

IBR Draft SEIS - RECORD #3560 DETAIL

First Name :	Morgan
Last Name :	Holmgren
Attachments :	DSEIS-3560_Holmgren_Original_Redacted.pdf (4 kb)

IBR Draft SEIS - RECORD #3560 DETAIL

Submission Date : 11/18/2024
First Name : Morgan
Last Name : Holmgren
Business/Organization/Agency :

Submission Input :

First Name:
Morgan

Last Name:
Holmgren

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
I am worried this project doesn't have sufficient or good enough public transit. The plans around MAX seem to be an afterthought without planning for future increases in demand for use. Getting into Portland from Vancouver should be done as much as possible via transit since it is so much more efficient. But the plans seem to expect MAX to be slow and always small (3 cars) and for there to be no need for bus only lanes. I can't see how this is a project that helps reduce vehicle miles travelled without those features.

I support the move to right size the project in light of the recent information about how the current proposal uses poor traffic modeling and would likely just shift congestion elsewhere.

I also worry about the effect of the bridge on downtown Vancouver and its waterfront. Will this pollute and damage a new and thriving part of the community?

JCA comment #: 969

IBR Draft SEIS - RECORD #3561 DETAIL

First Name :	Steph
Last Name :	Routh
Attachments :	DSEIS-3561_Routh_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #3561 DETAIL

Submission Date : 11/18/2024
First Name : Steph
Last Name : Routh
Business/Organization/Agency :

Submission Input :

First Name:
Steph

Last Name:
Routh

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
Thank you for the opportunity to comment on the IBR Project. Honestly, I would be hard-pressed to improve on the comments of the Just Crossing Alliance. In particular, I remain perplexed at the proposed excessive width of the bridge. We need a right-sized bridge, and we need it now.
Succinctly Yours,
Steph Routh

JCA comment #: 968

IBR Draft SEIS - RECORD #3562 DETAIL

First Name :	Anthony
Last Name :	Resch
Attachments :	DSEIS-3562_Resch_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #3562 DETAIL

Submission Date : 11/18/2024
First Name : Anthony
Last Name : Resch
Business/Organization/Agency :

Submission Input :

First Name:
Anthony

Last Name:
Resch

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Neighborhoods and Equity

Comment:
If you are impoverished, or even just in a bad state temporarily financially, you cannot afford a car. Taxis to go from work, school, doctors appointments, and grocery stores are incredibly expensive. I own a car, and use it. Beyond economically, the elderly, disabled and neurodivergent cannot *all* be expected to use a car.

If we want Portland to actually be a thriving city for all and not just an amusement park for the upper

middleclass, we need to expand transit for everyone.

JCA comment #: 967

IBR Draft SEIS - RECORD #3563 DETAIL

First Name :	Laura
Last Name :	Feldman
Attachments :	DSEIS-3563_Feldman_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #3563 DETAIL

Submission Date : 11/18/2024
First Name : Laura
Last Name : Feldman
Business/Organization/Agency :

Submission Input :

First Name:
Laura

Last Name:
Feldman

Business or Organization:
Community Member of Portland's Portsmouth neighborhood, which would be impacted by the IBR.

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
The I5 bridgee replacementreduce 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 #: 966

IBR Draft SEIS - RECORD #3564 DETAIL

First Name :	Ross
Last Name :	Wheeler
Attachments :	DSEIS-3564_Wheeler_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #3564 DETAIL

Submission Date : 11/18/2024
First Name : Ross
Last Name : Wheeler
Business/Organization/Agency :

Submission Input :

First Name:
Ross

Last Name:
Wheeler

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
I strongly support side-by-side integration of light rail transit and the multi-use path. This design offers several significant advantages:

* Seamless Transfers: By placing the transit and multi-use path side-by-side, we can create a seamless and intuitive transfer experience for commuters and recreational users. This will encourage more people to choose sustainable transportation options.
* Enhanced Safety: Humans and vehicles don't mix. Exhaust and sound pollution from large trucks and fast-moving vehicles on the freeway make an unpleasant and degrading experience for pedestrians and cyclists. A unified design will improve safety and accessibility for all users, especially vulnerable populations. It will also

reduce the risk of conflicts between different modes of transportation.
 * Increased Ridership: The convenience and efficiency of this design will attract more riders to public transit, reducing traffic congestion and improving air quality.
 * Stronger Community Connection: A shared space for transit and active transportation will foster a stronger sense of community and encourage social interaction.

I urge the project team to prioritize side-by-side interaction of transit and the multi-use path, and work diligently to ensure its successful implementation.

JCA comment #: 965

IBR Draft SEIS - RECORD #3565 DETAIL

First Name :	Anthony
Last Name :	Resch
Attachments :	DSEIS-3565_Resch_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #3565 DETAIL

Submission Date : 11/18/2024
First Name : Anthony
Last Name : Resch
Business/Organization/Agency :

Submission Input :

First Name:
Anthony

Last Name:
Resch

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
Why are we continuing to shovel millions and millions of dollars into a civil project that is not only bleeding funds, but relies on outdated data and intends to destroy homes and businesses, with only a duct tape solution to the issue of traffic that won't fix the issue permanently?

The population of Portland and surrounding areas has increased, and yet, ridership across the i5 bridge has

DECREASED over time. And yet, we are continuing to bend-over-backwards for the motor and trucking lobbys, putting alternative transit solutions onto the back burner. An over the shoulder buslane isn't going to fix the congestion, and can, and most likely will be, converted into another car lane.

Please. The addition of lanes will never fix the issue. We *NEED* transit alternatives to private automobiles. We need expansions to bikes, busses and rail.

JCA comment #: 964

IBR Draft SEIS - RECORD #3566 DETAIL

First Name :	Katherine
Last Name :	Kelly
Attachments :	Vancouver_Original.pdf (6 mb) Final Comment Letter on Draft SEIS from CoV staff w_attachments.pdf (6 mb)

November 18, 2024

Interstate Bridge Replacement Program
Attn: Greg Johnson, Program Administrator
500 Broadway, Suite 200
Vancouver, WA 98660

RE: City of Vancouver Comments on the Interstate Bridge Replacement Program Draft Supplemental Environmental Impact Statement

Dear Administrator Johnson,

Thank you for you and your team's continued coordination and work with partners to achieve a Draft Supplemental Environmental Impact Statement (Draft SEIS) and Section 106 Report. City of Vancouver staff has reviewed these documents and we are pleased that the analysis affirms intended benefits of the Modified Locally Preferred Alternative (Modified LPA) and demonstrates consistency with the Interstate Bridge Replacement (IBR) Program's Purpose and Need. The proposed investments reflect extensive collaboration among Program partners and community engagement.

Following are staff's comments on the Draft SEIS with particular focus on Chapters 3 (Existing Conditions and Environmental Consequences along with accompanying technical reports) and 4 (Section 4(f) Draft Evaluation). Comments regarding the Program's Section 106 report are embedded in Chapter 3.08, Cultural Resources and in alignment with Attachment A. Our comments are based on the following policies, plans, and regulations as guidance:

- City of Vancouver Desired Outcomes Resolution (2021)
- City of Vancouver Conditions of Approval for the Modified LPA (2022)
- IBR Modified LPA Commitments (2022)
- Federal agency requirements and funding considerations
- Existing City plans: *Comprehensive Plan (2011-2030), Parks, Recreation, and Cultural Services Comprehensive Plan, Climate Action Framework, Urban Forestry Management Plan, Housing Action Plan, and Reside Vancouver Anti-Displacement Strategy*
- City plans recently adopted or underway: *2023-29 Vancouver Strategic Plan, 2024-2044 Transportation System Plan, Comprehensive Plan Update (currently underway), Citywide Equitable Development Strategy, Economic Development Strategy, Downtown Redevelopment Study, Downtown Access, Mobility and Parking Plan, and Update to Downtown Design Guidelines*.

In addition, comments have been developed through consultation with City subject matter expert staff, feedback from the Vancouver community collected during the comment period through numerous IBR-led events, and through City-led discussions with the following City advisory bodies:

- Mayor and City Council members
- Parking Advisory Committee (10/9/2024)
- Parks and Recreation Advisory Commission (10/16/2024)
- City Center Redevelopment Authority (10/17/2024)
- Planning Commission (10/22/2024)
- Aviation Commission (10/23/2024)
- Transportation and Mobility Commission (10/29/2024)
- Culture, Art & Heritage Commission (11/7/2024).

In general, we find that the Draft SEIS reflects consistency with the City of Vancouver's Desired Outcomes Resolution (2021), Conditions of Approval for the Modified LPA (2022), and IBR's Commitments for the Modified LPA (included in Attachment B). The comment letter calls out where City staff recognizes that more work is needed to fully achieve some of these provisions and, as development of a Final SEIS proceeds, City staff will continue to affirm consistency with provisions in these documents. Additionally, there is a need to indicate which elements are included as required Program measures per federal standards/regulations, mitigation measures, which will be addressed in subsequent phases of work, and which may be defined as Community Benefits through the Community Benefits Advisory Group process.

As the program shifts into focusing on detailed designs, it will be important for the City and public to be highly engaged. The engagement process should build up IBR's advisory groups, Community Benefit Organization (CBO) partnerships, and communication channels, but should be expanded to include other methods to ensure that all interested parties and voices are involved. In the coming months, we recommend working with the cities to develop a plan for engaging partner agencies and the community in the Conceptual Design Report and other design documents. This would support the City's Conditions of Approval that: "engagement must be accessible and open to a wide variety of stakeholders and all community members" and "recreational and open space design shall be determined in collaboration with Program partners and the community."

For reference, Attachment C summarizes feedback we heard from City of Vancouver Advisory Bodies and general public. Attachment D includes additional administrative comments on the Draft SEIS.

On behalf of City of Vancouver staff and leadership, we look forward to continuing the important IBR Program work together.

Sincerely,

Katherine Kelly

Katherine Kelly
Policy Advisor

City of Vancouver Comments on Draft SEIS and Section 106 Report

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Community Connectors

Evergreen Area

City staff has begun a collaborative process with the IBR team to develop a site plan for the Community Connector, a proposed freeway lid defined within the Modified LPA adjacent to the future light rail station near Evergreen Boulevard. The process has involved focus groups with community leaders and interested parties in August 2024, the creation of an initial list of guiding principles for the Connector and its surroundings (Attachment E), and submittal of a federal grant application to help fund construction. As a next step, the City and IBR are planning to conduct community engagement on alternative concepts for the Community Connector beginning in early 2025.

- Continue to support a collaborative, community-oriented process for developing a site plan for the Community Connector.
- Incorporate the initial desired outcomes and guiding principles for the Community Connector and its surroundings, which reflects early feedback from community leaders and interested parties (Attachment E).

Waterfront Area

Under the Modified LPA, the height of a new bridge would open up land under I-5 at the Vancouver waterfront. An extension of Main Street underneath the freeway from central Downtown to the waterfront is planned. New east-west active transportation connections are also envisioned in this space, including a new path from Main Street to Old Apple Tree Park and a segment of the Renaissance Trail. It will be important to design this space with activation for public use, accessibility for all, safety, security, and consideration of long-term maintenance and operations in mind. The following are initial guiding principles for design of the space, for incorporation into the Final SEIS and the design process moving forward:

- Serve the region's diverse and growing community, connect Vancouver's waterfront, and integrate with existing and forthcoming open space investments (City of Vancouver Desired Outcome).
- Design active transportation facilities to be safe and accessible for all with direct, intuitive connections to existing networks of public spaces, parks, and recreation facilities.
- Use "crime prevention through environmental design" (CPTED) principles.
- Ensure coordination between the City, WSDOT, Port of Vancouver, TriMet, National Park Service, and adjacent property owners in developing the long-term plan for the maintenance and activation of the area.
- Based on Community Benefits Advisory Group (CBAG) recommendations:
    - Create riverfront public access points and provide recreational opportunities, communal and open space including areas for fishing and hiking on both sides of the river, where feasible.

- Explore opportunities to develop community spaces, such as an inclusive civic center with shared parking for the public market and transit station.
- Integrate river access with public spaces and stormwater facilities.

Shared Use Path (SUP) Landing at Vancouver Waterfront

- In section 4.8.2.1 of the Transportation report, acknowledge an adverse impact for active transportation users due to the increased bridge height, which requires SUP users to travel a greater vertical and horizontal distance to reach the bridgehead from the waterfront. The conceptual design for the ramp connection shown in the Draft SEIS does not fully meet the following City of Vancouver Condition of Approval: *Active transportation facilities shall be designed to facilitate a comfortable, low stress experience during all seasons and in all types of weather, prioritize safety of vulnerable users and ensure safe and convenient access from the local network to new facilities*.
- While the proposed ramp would be designed to meet or exceed Americans with Disabilities Act (ADA) requirements, some users may not want to or be able to use this ramp due to its length and potential conflict with users traveling at faster speeds. Address this issue through design of the ramp and by pursuing multiple design options for connecting the bridge's SUP to the waterfront, Downtown, and Fort Vancouver Historic Reserve – considering the wide range of user groups and their various abilities, needs, and preferences. This includes consideration of other ramp alignments, elevators, and integration with transit stations.
- Consider extending the SUP from the bridge over the Columbia River to the Community Connector and Evergreen Station, in addition to connections at the waterfront.
- Limit the number of columns supporting the SUP ramp connection to the waterfront as much as feasible in order to create a more usable and inviting space.

Path connecting Main Street Extension to and through Old Apple Tree Park

- Avoid impacting mature trees, especially those within Old Apple Tree Park.
- Design for easy access to annual Old Apple Tree Festival, considering large crowds.
- Maximize contiguous open space while providing a direct path from Main Street to the park's entrance.
- Consider expanding the footprint of Old Apple Tree Park in order to integrate with space that will open up under I-5 in the waterfront area.

Process moving forward

- Continue to work with the City to develop and implement a community engagement process to inform decisions about design, use, and operations and maintenance of the Waterfront area.

Applicable to both areas

Based on potential recommendations from the CBAG, incorporate the following principles into the design and operation of both station areas:

- Include bicycle amenities (repair kiosks, etc.) near the stations. (While this is assumed to be included already, section 1.1.4.2 in the Alternatives Description of each report is not explicit about bike amenities).
- Explore creative solutions to ensure accessibility in constrained spaces.
- Consider the provision of public restrooms near the transit stations.
- Improve mobility and accessibility for all users at transit stations and the shared use path by connecting spiral ramps, elevators, and stairs with resting areas.
- Provide adequate shelter for all weather conditions at transit stations.

3.01 Transportation (Transportation Technical Rpt.)

Active Transportation

- Include reference to the City of Vancouver's 2024 – 2044 Transportation System Plan (TSP) definition of small mobility in the description of planned active transportation improvements. According to the TSP, small mobility devices include but are not limited to: scooters, one-wheels, bikeshare bicycles, e-bikes, and cargo bikes. *Renaming bike lanes as "mobility lanes" provides a more inclusive term for the many different types of devices we need on our streets to meet our climate goals*.
    - Describe how the Modified LPA will account for the range of small mobility devices that will be used on the new active transportation facilities – acknowledging the importance to plan for the full range of existing and emerging modes. This is consistent with CBAG recommendations on "future proofing" and the City's TSP, which says: *The term "mobility lane" also helps us account for the emerging speed differential between bikes, e-bikes, and other mobility devices*.
    - Analyze the safety and accessibility of the proposed bike facilities and shared use paths (including the one on the new bridge and its connection to the Vancouver waterfront) through the lens of small mobility – considering speed differential across modes, spatial needs, and other design factors.
- Consider and incorporate the following CBAG recommendations related to active transportation:
    - Consider maintenance, safety, active management, and future proofing in the design aspects of the multi-use paths throughout the program area.
    - Develop robust trail systems that surpass federal requirements, leveraging creative solutions to increase functionality and community value, and are responsive to the community's needs and input.

    - Enhance safety for bicyclists and pedestrians crossing the bridge by incorporating protective features into the design (such as the spacing of the railing/gaps).
    - Provide wayfinding signage to aid navigation, focusing on recreational and transportation users.
    - Provide adequate bicycle signage and wayfinding, both during construction and after program for safety enhancement in local communities.
    - Provide shelters, water, and bathrooms for different users, with a focus on those using paths for both recreation and essential travel.
    - Expand the bridge's bike and pedestrian paths and install barriers to separate them from vehicular traffic, enhancing both safety and noise reduction. Consider design treatments to reduce exposure to wind and vehicle exhaust.
    - Design active transportation facilities to create a comfortable, low-stress experience, prioritizing the safety of vulnerable users and providing convenient access from the local network to new facilities.
    - Incorporate safety metrics such as parent comfort level for bike paths and level of traffic stress in urban design to ensure user-friendliness and safety.
- Work with the City and community (especially Neighborhood Associations adjacent to or overlapping) to ensure the 29th and 33rd Street overpasses are more comfortable for people walking, rolling, biking, and using small mobility devices.

Local Streets

- Further analyze findings related to traffic impacts on the local transportation system from increased bus service in the downtown area, including C-TRAN Highway-99 Bus Rapid Transit (BRT) service.
- Evaluate the impact of elimination of the westbound SR-500 to Fourth Plain Blvd interchange on the existing SR-500/St. John’s interchange and streets (including Mill Plain interchange area) that lead from this interchange to the Fourth Plain corridor.
- Consider mitigation needed on the City’s local roadway pavement structure due to construction vehicles using local roadways to access construction areas.
- Provide more detail about which intersection movements/legs are failing in the Existing Conditions and the Modified LPA.
- Clarify the mitigation for the Columbia Shores and Columbia Way intersection since delay is made worse with the Modified LPA option.
- In section 3.1.3 of the Transportation chapter, clarify why the demand volume across I-205 bridge in 2045 would be 3% lower as compared to the No Build.

Transportation Demand Management (TDM)

- The Modified LPA speaks to the physical infrastructure to meet the non-single occupancy vehicle (SOV) travel needs but does not speak to continuing existing TDM programs. To fulfill IBR's commitment to develop a comprehensive TDM program, the Final SEIS needs to identify more TDM strategies than just physical infrastructure like education, encouragement, communications and marketing, and subsidies and incentives. Address the City's Condition of Approval to develop strategies for managing auto demand and congestion during peak traffic periods, supporting downtown Vancouver's circulation goals, and reducing greenhouse gas emissions – in addition to using variable rate tolling.
- Elaborate on potential impacts to – and options to enhance - TDM and TSM during construction.

Tolling

- Align the summary of tolling impacts in Chapter 3.01 with the detailed discussion on tolling in the Transportation technical report:
    - Include the information on diversion to I-205 in Chapter 3.01 in Section 4.11 (Tolling and Diversion).
    - In section 4.11, clearly explain how the analysis arrived at the key findings listed in Section 4.11.3, particularly those related to diversion to the I-205 Bridge and changes in destination choice. The report refers to multiple appendices, making it hard to understand the rationale for the key findings.
- Clarify how the diversion effects from tolling may vary over time (as people make adjustments to their travel patterns) and vary across time of day (e.g., the possibility for more diversion to I-205 during off-peak hours).
- To address opposition to pre-completion tolling that City staff has heard, there should be clear and robust information shared immediately about preventive measures the Program will take to address noise, vibration, construction dust, maintenance of traffic on both the I-5 mainline and within neighborhoods adjacent to the Program. Note that one neighborhood stated they are not opposed to tolling post-construction but are opposed to tolling starting during construction, for the reasons noted above.

Safety

One of the City's Desired Outcomes is to "Reduce collisions on local roads leading to and within downtown." Additional information and potential mitigation measures are needed to achieve this outcome.

- In section 4.9.2.2 of the Transportation report, clarify what type of crash risk could increase at the Evergreen Boulevard/C Street intersection. Clarify the contribution to volume changes at this intersection due to trips associated with the Evergreen transit station and park and ride (options 2a or 2b). Identify potential mitigation that would reduce the crash risk.

- The Draft SEIS says that under the "No C Street Ramps" option, the potential for crashes at the Mill Plain interchange increases because there would be more traffic at that location. Of the 55 intersections in the Vancouver study area (Table 3-37 in Appendix G of the Transportation Technical Report), Mill Plain Blvd and I-5 NB on-/off-ramps had the second highest number of crashes (30). Therefore, regardless of the change in overall crash risk in Vancouver, any increase in the number of crashes at the Mill Plain interchange would be problematic and would require mitigation.
- Evaluate and consider the recommendations provided in the Executive Summary of the IBR Health Analysis prepared by the Washington State Department of Health, Clark County Public Health, Cowlitz Indian Tribe, Oregon Health Authority, Multnomah County Health Department (Attachment F). The City of Vancouver supports this effort in general and the following recommendations related to safety specifically:
    - Design and mark routes during construction to protect pedestrians and active transportation users from injury and environmental exposures.
    - Expand information about potential air quality, safety, and connectivity impacts of construction.
    - Compile and release to the public additional information about potential air quality, safety, and connectivity impacts of tolling-related traffic diversion through neighborhoods.

Freight

- Continue coordination with partners to ensure that high, wide and heavy cargo can safely move through the project area. In alignment with the Port of Vancouver, the City 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).
- Ensure the continued facilitation of High, Wide, and Heavy freight movement through the project area. Specifically, the following elements are critical:
    - Safety shoulders of at least 12 feet on both sides for both directions of traffic.
    - Grades not exceeding 4% on the main profile.
    - Turning radii of at least 100 meters NB from the Mill Plain interchange.
    - Height clearances of at least 20 feet under the Mill Plain interchange and throughout the project area.
    - Toll gantries need to have at least 25 feet of clearance to allow freight movement underneath.

Temporary Effects

- Provide multilingual support to transit agency partners during and post construction so that changes or impacts to transit service does not endanger the livelihoods of non-English speakers who rely on transit for their primary mode of transportation.

- Incorporate the potential CBAG recommendation to: “Increase public transit services and explore alternative routes to mitigate transportation impacts to transit riders, walkers, bikers, rollers, and people using mobility scooter during construction, including the implementation of shuttle buses and additional bus routes along the impacted routes in the cities of Vancouver and Portland.”
- Ensure that any closures or detours for pedestrian circulation provides an ADA accessible option.

3.02 Navigation (Navigation Technical Rpt.)

- City staff advocates for ongoing efforts to work with the owners and operators of impacted vessels to identify mutually acceptable measures that result in a fixed span bridge.
- Continue advocating for a Preliminary Navigation Clearance Determination from the US Coast Guard as soon as possible, followed by approval of a permit to enable construction of a fixed span bridge.

3.03 Property Acquisitions and Displacements (Acquisitions Technical Rpt.)

- Provide a range of degree/severity and general parameters describing potential impacts for partial acquisitions, temporary easements, and subsurface easements. For example, Section 5 of the Acquisitions report describes the types of temporary acquisitions required and quantifies the number of easements needed for each subarea and land use type; however, it does not analyze the potential impacts from the temporary use, such as the potential for property damage.
- Clarify why the parcel with the existing Vancouver Community Library is shown as a partial acquisition (i.e., Park and Ride facility).
- The Acquisitions report indicates that the realignment of W 3rd Street could require full acquisition and displacement of the office building located on the southeast corner of W 4th Street and Columbia Street. This building is the “Lucky Lager Warehouse”, which is listed on the Clark County Heritage Register. Although it is not eligible for National Register of Historic Buildings, displacement of this building should be avoided if possible. Seek design adjustments to avoid the full acquisition and displacement of the Lucky Lager building.
    - If acquisition of the Lucky Lager Warehouse is unavoidable, coordinate with the City and property owner(s) to determine potential land uses for this block, pending final design of the transportation improvements adjacent to this site.
- Consistent with the potential CBAG recommendation, ensure that the real estate process, including outreach and negotiations, provide for language access and culturally specific and relevant services.
- Potential impacts to residential properties north of Fourth Plain are of particular concern. IBR should pay extra attention to working with property owners and

tenants in this area. Inspections prior to construction upon owner agreement and other relative recommendations discussed as part of the CBAG "Avoid Further Harm" category apply here.

3.04 Land Use & Economic Activity (Land Use and Economics Technical Rpts.)

- Update references to the City's Strategic Plan (2023-2029) and TSP (2024-2044) to reflect the adoption dates. This includes but is not limited to section 2.3.4 in the Land Use report.
    - Analyze consistency of the Modified LPA with the City's recently adopted plans in the Land Use report.
- Consider the City's current planning work in the development of mitigation measures and future designs. This includes the 2025-2045 Comprehensive Plan update, Downtown Access, Mobility, and Parking Plan, Downtown Redevelopment Study, Downtown Design Guidelines, Waterfront Gateway redevelopment, and Citywide economic and equitable development strategies. Coordinate with City staff to get up-to-date information on these efforts.
- Update Section 3.3.2 of the Land Use Report to reflect updates and corrections to recent and pending development, as listed in Attachment D.
- Page 2-11 of the Economics report states that the "employee-per-square-foot ratios for business types used data from the results of the latest reported ratios from Metro modeling (Metro 2015, p.8)." In doing so, the Draft SEIS estimates that 400 employees are associated with the 10 downtown Vancouver businesses that would be displaced, as shown in Table 3.4-11 in the Land Use & Economic Activity chapter. In order for the program to support displaced businesses and employees, a more accurate count is needed.
    - Conduct additional analysis of the existing businesses that would be affected by any business displacements in Downtown Vancouver. Consult with the business owners to get an accurate employee count and to understand their specific needs for relocation.
- Coordinate with the City and property owners to address the potential for construction to cause negative economic effects by possibly blocking visibility of storefronts and impacting access to businesses in Downtown.
- Work with the City and southwest Washington partners to redesign the area just east of I-5 near the waterfront (Kirkland development area) to ensure no loss of function, access, or economic opportunity.

3.05 Neighborhoods & Equity (Neighborhoods & Populations, Equity, Technical Rpts.)

Neighborhoods and Population

- Table 4-2 (Overview of Anticipated Effects on Vancouver Neighborhoods) in the Neighborhoods and Population technical report (Neighborhoods report) only includes 7 of the 10 Vancouver neighborhoods in the program area; it is missing the

first three discussed in Sections 4.4 and 5.3). In addition, the discussion on the potential impacts and benefits in Sections 4.4 and 5.3 is inconsistent across neighborhoods in Vancouver. For example, the Draft SEIS does not make a finding about the impact of displacement on neighborhood cohesion for Shumway, but it does for Esther Short. The discussion the Hough neighborhoods is only one paragraph. Some discussions mention impacts to parks in the neighborhood, while others do not.
    - Update the summary of effects on each neighborhood in Sections 4.4 and 5.3 to follow the same outline to enable a more complete picture, even when the finding is "no impact."
    - Include temporary and long-term effects on applicable parks and recreation facilities and clarify if any of these effects would have adverse neighborhood impacts.
    - Include all 10 Vancouver neighborhoods in Table 4-2.
- The Neighborhoods Report says "The Evergreen Inn, immediately north of the SR 14 interchange, is also anticipated to experience noise impacts that cannot be mitigated. Please see the Noise and Vibration Technical Report for discussion of noise impacts and mitigation for the Modified LPA." However, the Noise and Vibration report does not mention the Evergreen Inn, and Tables 4-4 and J-3 do not show an impact for the closest receptor location (DT-036). Section 4.6.2.4 of the Noise and Vibration report predicts a moderate noise impact at the Normandy Apartments due to light rail noise and identifies mitigation in section 7.7.2.1, but this impact and mitigation is not mentioned in the analysis of impacts to Esther Short in the Neighborhoods Report.
    - Confirm and update the anticipated noise impacts to Esther Short in the Neighborhoods Report to align with the findings in the Noise report.
- Section 4.1.10 of the Neighborhoods report finds that the "No C Street ramps" design option could reduce neighborhood cohesion in the Esther Short neighborhood by substantially increasing travel delay for residents and people accessing the neighborhood. However, this potential impact is not acknowledged in Table 4-2 (Overview of Anticipated Effects on Vancouver Neighborhoods). In addition, the Program-specific mitigation for impacts on neighborhood cohesion included in section 7.1.2 is too vague, as written.
    - Acknowledge the potential impact to neighborhood cohesion in the Esther Short neighborhood resulting from the "No C Street ramps" design option in Table 4-2, and identify specific measures that would mitigate this impact, if that design option is selected.
    - Identify specific measures to mitigate neighborhood cohesion impacts resulting from impacts to Marshall Park in the Central Park neighborhood) and from the potential business and residential displacements in the Esther Short neighborhood (depending on the design option).

- Per the Health Analysis report (Attachment F), modeling is on too large of a scale to understand local health impacts in the program area.
    - In the Neighborhood report, provide additional analysis and define efforts to mitigate any health impacts, such as green infrastructure and indoor air filtration.
- Leading up to and during the Draft SEIS comment period, City staff has heard concerns about construction impacts from Vancouver community members. There is particular concern about dust, noise, and vibration during construction. Residents and businesses in the Esther Short neighborhood are worried about impacts to Downtown circulation due to increased traffic congestion – including pedestrian safety, reliability of affected bus routes, access to businesses, ADA accessibility. Residents of Smith Tower and Esther Short neighborhood are concerned about the ability for emergency vehicles to respond to calls for services (particularly for senior housing, including Evergreen Inn). Residents of Shumway are concerned about cut-through traffic when the 39th and 33rd overpasses are closed/being rebuilt. Arnada neighborhood has concern about construction-related impacts to Arnada Park. The Neighborhoods and Population technical report (Neighborhoods report) affirms concerns about adverse effects on cohesion, including "given that the potential construction duration could be up to 15 years, neighborhood quality and cohesion could be negatively impacted during construction for neighborhoods adjacent to the corridor".
    - Continue to coordinate with City staff to identify specific measures that will reduce and avoid construction-related impacts on neighborhoods. This includes impacts related to traffic, pedestrian and bicycle networks, and access to businesses, residences, and community resources such as parks, schools, and public spaces.
    - Work with the City to develop and implement a strategy for managing construction impacts in Downtown that includes support and outreach to businesses.
    - Include a mitigation that will ensure dust control in areas where outdoor sports are played. Use of water trucks during construction is proposed.
    - Ensure ongoing communication and engagement with residents, businesses, and community groups in the program area. Provide timely information about construction timeline, potential construction-related effects and the measures taken to reduce and avoid impacts. Provide notifications of any construction disturbances as soon as practical.
    - Coordinate with the City of Vancouver's community engagement, communications, and IBR teams to utilize the City's outreach and engagement channels.
- Consider and incorporate the following potential recommendations from the CBAG:

- Develop a proactive communication plan for before and during construction to keep the public informed of potential impacts such as noise, route closures, other mobility impacts, etc.
- Include communication for transit/mobility impacts as soon as possible, as well as messaging to homeless service providers.
- Establish a comprehensive process for community members to voice concerns and report negative impacts, potentially including an online platform and/or hotline where community members can report issues and receive timely responses, ensuring a commitment to responsiveness and due diligence to reach resolution. Explore the use of AI.

Equity

The Equity report, as well as the Environmental Justice report, demonstrate IBR's commitment to "prioritize access, influence, and decision-making power for marginalized and underserved communities throughout the program". Additional analysis, mitigation, and engagement is needed to fully achieve the City's Conditions of Approval, as noted in this section and under Environmental Justice below.

- Section 6 of the Equity report (Indirect Effects) does not fully characterize the City's *Reside Vancouver*, which was prepared in 2019 and focused on two neighborhoods in Central Vancouver. Since then, the City has developed citywide data sources. In Section 6:
  - Refer to the City's Displacement Risk Analysis and Map completed in 2022 to characterize equity priority communities and displacement risk within and outside of the program area (including it the Fourth Plain area just east of the program area).
  - In addition to the statement that low-income homeowners could benefit from a rise in property values, acknowledge that the risk that rises in property values can still cause displacement if the homeowner is not able to afford the corresponding increase in property taxes over time.
  - Mention how proximity to light rail stations could lead to increased risk of residential displacement.
  - Align with the updated discussion of indirect impacts and mitigation in the Environmental Justice report.
- In response to concerns about indirect displacement and the goal to maximize benefits to equity priority communities, the CBAG has affirmed the recommendations to support transit-oriented development (TOD) and to "prioritize innovative developments on the land adjacent to the bridge, with a focus on projects that promote accessible and affordable housing." The CBAG is also considering recommendations to "develop affordable housing near transit areas" and "prioritize the development of affordable housing by developing underutilized properties." Staff supports these concepts and encourages the IBR Program to:

    - Work with the City to explore opportunities for TOD in Vancouver as part of the IBR Program and community benefits work.
    - Work with the City and partners to pursue funding for TOD to support affordable housing development near the light rail stations.
    - Build upon the City's preparation and assumed adoption of an Equitable Development Strategy and other Downtown planning efforts and work with City staff to identify any additional infrastructure or access needs beyond IBR and City planned actions, and anti-displacement and community stabilization measures specific to Downtown and the Esther Short neighborhood.
- Accessibility of the transit and active transportation networks to people of all ages and abilities is a top concern. While the Equity report discusses many of the transportation benefits of the Modified LPA and acknowledges that "differences in the experiences of active transportation users could adversely affect equity priority communities more than the general population", the Program-specific mitigation does not align with the discussion of potential impacts and design considerations.
    - In Sections 4 and 5 of the Equity report, provide more details on how the various equity priority communities could experience differences in the ability to use and benefit from the Modified LPA investments, and identify measures to address any potential impacts.
    - In Section 4.2, discuss the potential challenges to various equity priority communities associated with "extensive ramp distance" connecting the shared use path on the bridge to the waterfront, as discussed in the Transportation report. For example, older and younger people may have less stamina, and blind/hearing-impaired travelers have greater risks. Refer to the discussion on the Waterfront Area above for recommendations on how to address equitable accessibility concerns with the shared use path.
    - Integrate design considerations and community input listed in Sections 4.1.4 and 4.2 into the Program-specific mitigations in section 7.1.2 to ensure these important details do not get lost. Add to this list:
        - Design facilities for all ages, including young people and older adults.
        - Considering accessibility for blind and deaf people in all stages of program design and implementation.
        - Treat ADA as the floor, not the standard – implement the Public Right-of-Way Accessibility Guidelines (PROWAG) as current best practice for design and construction.
    - Consider and incorporate the feedback from accessibility-oriented community leaders and people with disabilities provided to the City of Vancouver (Attachment G).
- Explore and incorporate the following CBAG recommendations:
    - Use universal design and be radically inclusive

    - Consider accessibility in the selection of materials for transit areas, such as textured pavement.
    - Prioritize mobility and accessibility in the design of elevators and staircases, along with considerations for aesthetics.
    - Incorporate innovative solutions to exceed ADA requirements, enhancing accessibility and mobility thoughtfully.
    - Integrate acoustic enhancements in designs to better accommodate individuals with visual impairments, ensuring path support.
    - Incorporate green spaces and water stations at public transit locations to accommodate service animals, especially during hot days.
    - Involve experts with lived experience and the broader community in transportation planning to ensure that designs effectively address the mobility and accessibility needs of various groups, especially individuals with disabilities.
- Section 4.1.1 of the Equity report discusses "differences in terms of distribution of benefits (i.e., increased access) between equity priority communities living in the study area and their non-equity priority counterparts". Section 8 (Synopsis and Next Steps) states: "To address this, the Program is working closely with C-TRAN to optimize the transit network and create convenient bus connections from the Evergreen Station to surrounding racially diverse neighborhoods." In this section, also state that the Program should work with the City to optimize the active transportation networks and connections to bus stops and the light rail stations as a means for increasing regional transit access to jobs among equity priority communities.
- In Section 4.4 of the Equity report (Tribal Consultation), describe the level of engagement with Tribal governments and summarize the potential benefits and impacts to tribes, based on IBR's consultation.
    - Acknowledge the long-standing impact the existing bridge and freeway has had on spaces that were once occupied by indigenous populations.
    - Consistent with CBAG's potential recommendation, collaborate with tribal governments and property owners with the goal of maintaining access to the river throughout construction.
- Section 5.1.1 of the Equity report finds that "construction of the Modified LPA would likely affect houseless individuals and families living in the IBR Program area during construction." Section 7.2.2 includes the Program-Specific Mitigation to "coordinate with local jurisdictions and other organizations offering services to people experiencing unsheltered houselessness in areas directly affected by construction activities. Services would be provided in advance of construction and could include harm reduction, access to health services, and emergency shelter or alternate housing options." To strengthen the proposed mitigation, consider the following potential recommendations from the CBAG:

- Develop comprehensive strategies and funding options with the program and other partners that can be implemented to address the relocation and housing needs of people experiencing unsheltered homelessness affected by the program.
- Explore partnerships with agencies providing culturally specific services focused on equity priority communities and those who conduct street outreach and engagement for housing placement.

3.06 Public Services and Utilities (Public Services and Utilities Technical Rpts.)

- The City of Vancouver owns stormwater conveyance and outfall facilities within the program area, but the Utilities chapter does not list them as critical facilities that could be potentially disrupted by the program.
  - Describe the City of Vancouver's stormwater facilities in the Utility report.
  - Analyze and discuss the potential disruption to City stormwater facilities during construction.
  - Relocate or retain all existing stormwater connections prior to any downstream conveyance modifications, removal or disruptions to avoid flooding.
- Clarify the process for obtaining review and approval from Vancouver Fire Department (VFD) as part of bridge and roadway design, and ensure VFD and Vancouver Police Department (VPD) in all stages of Program design and implementation.
- The Utilities report contains multiple statements that fire flow on both sides of the river will be disrupted. It also states that "Loss of the main could affect water supplies and fire flows." This is not entirely accurate as the loss of the main would absolutely affect water supply and fire flow. Loss of the main in all areas listed is not an option. Whether short-term or long-term, where any modifications to water mains is planned, careful coordination with VFD and PF&R will be critical, and temporary provisions to accommodate fire flow may be required. Maintenance of flows is particularly important in the future, since as noted in the energy and air quality analyses, use of electric vehicles is expected to increase and the volume of water required to control an electric vehicle fire is exponentially larger due to the nature of battery fires. Therefore, the Final SEIS should acknowledge the potential impact and include the following mitigation measures:
  - Phase construction to avoid interruptions to fire flow to the extent possible.
  - Coordinate with VFD to develop a plan for ensuring fire flow is maintained throughout construction, using temporary provisions as needed. Temporary provisions may entail temporary above ground hard piping, storage water, and/or fire pumps.

    - If temporary disruptions in fire flows is unavoidable, provide additional details on the anticipated locations and durations to VFD and Portland's Fire and Rescue as soon as that information is available.
- In responding to emergencies, VFD finds that emergency rooms are frequently at capacity and travel across the Columbia River is required. Therefore, any street closures, even during off business hours, must be coordinated with emergency service providers (fire, police, ambulance services, and the 911 call center). To ensure that emergency access is maintained through construction, refine the Program-specific mitigation measures for temporary effects to public services to include the following details:
    - Notify emergency service providers of any planned closures of lanes, stacking of traffic, or other potential delays for fire response and medical transport across the Columbia River.
    - Clearly identify any alternate routes in communications with emergency service providers.
    - Consider reserving a lane strictly for emergency use only.
- It will be critical for the VPD to be able to access construction zones in response to calls for police services. Construction zones will change frequently and will contain hazardous materials and equipment. To avoid interruptions to emergency service, include the following mitigation measures:
    - Communicate regularly with VPD about access points to construction zones.
    - Clearly mark explosives and other hazards within construction zones so that they are visible in the event VPD needs to access the site in an emergency.
- Confirm that utilities extending beneath I-5 along Columbia Way and 5th Street would not be temporarily affected by construction.

3.07 Parks and Recreation (Parks and Recreation Technical Rpt.)

- Ensure that all parks used during construction or permanently affected by the program are, at a minimum, returned to the state they were in or better (per City standards) when construction commenced.
- Plant replacement trees in parks as soon as possible (i.e. prior to construction and when the remaining construction will not damage them).
- Ensure the survival or replacement of the new trees for at least 10 years following planting.
- Incorporate the potential CBAG recommendation to maintain green space within the project alignment and compensate for lost green space by creating or enhancing green spaces in underserved areas.

3.08 Cultural Resources (Historic Built Environment Technical Rpt., Section 106 Rpt.)

- The City supports and reiterates all comments and proposed additions, edits, refinements relative to the Vancouver National Historic Reserve submitted by The Historic Trust (see Attachment A). Of particular note is the need to immediately work with the City and stakeholders to begin a process of defining agreed upon mitigations for impacts to the Post Hospital.
- Area of Potential Effect (APE)
  - Incorporate the APE boundary on interactive project map on the Section 106 portion of IBR website.
  - The City maintains that there may be proposed changes to the boundary of the APE and/or consideration of potential impacts and associated mitigations to properties adjacent to the APE. The process to determine effects with any potential boundary changes to the APE must be laid out in a Programmatic Agreement (PA).
  - In consultation with the City, other consulting partners, and the community, develop a plan to define and implement mitigations related to The Post Hospital.
- Where there are identified adverse impacts to Historic buildings, the City advocates there be, at a minimum, replacement of windows, installation of HVAC systems, dust mitigation such as watering trees and landscape areas, to address anticipated noise, vibration, and air quality impacts due to IBR Program construction.
- Prior to completion of the IBR Program's next round of financial and risk analysis and subsequent cost estimate, the City requests that there be coordination among WSDOT, Oregon Department of Transportation (ODOT), and consulting partners to create a process to define: 1) current Section 106 cost estimates, and 2) a minimum set aside of funding for Section 106 mitigations.
- Define, in a Programmatic Agreement, tangible capital and programmatic elements that proactively draw attention to the area so that understanding of the historical and cultural significance expands. Examples of this include more visibly prominent elements that will be relevant and accessible for several generations.
- Continue collaboration with program partners to define physical and programmatic mitigations and benefits through a Programmatic Agreement.
- Support the City in acquiring archaeological support staff.

3.09 Visual Quality (Visual Quality Technical Report)

- Early in the report, clarify how the IBR program will make design decisions and the roles of local agencies and the public in this process to provide a consistent baseline upon which all visual findings can be justified. Emphasize the need for consistency with local design standards. Refer back to this description where applicable.
- In section 7.1.2.1 (Mitigation Common to All Landscape Units), clarify that IBR will conduct public engagement to inform the final design of program elements that go beyond freeway specifications. Engagement will include but not be limited to in-

person workshops. IBR will coordinate with the cities to develop and implement outreach and engagement.

- Acknowledge the potential tension between local standards and a uniform theme for the Program, given that two cities and two states are involved. The final design should seek to balance the goals for context-sensitivity and a consistent, unifying theme that reflects regional collaboration.
- Remove reference to the Vancouver Design Review Committee (which no longer exists) and replace with City of Vancouver community development staff.
- In addition to station areas, include in the program-specific mitigation applicable to all landscape units:
    - Use CPTED principles in the design and lighting of underpass areas, overpasses, and any other area that is publicly accessible by foot.
    - Seek to balance the objectives of lighting (which can sometimes be at odds with each other): provide safety and security at night for transit operators and users of public spaces, avoid impacts to wildlife and ecosystems, and avoid excessive or obtrusive light and glare at adjacent land uses.
    - Coordinate lighting design and volume (lumens) with City and WSDOT standards.
- The Visual Quality report finds that the Modified LPA replace and restore landscaping in the program footprint, but that "this new landscaping would not substantially replace visual elements associated with mature trees for many years" and therefore "vegetation removal would be considered a long-term impact." As mitigation, explore opportunities to plant more mature trees to accelerate the restoration process (consistent with CBAG recommendations).
- In the program-specific mitigation for visual quality impacts, incorporate the desired design outcomes found in Attachments B (City of Vancouver Desired Outcomes) and E (Guiding Principles for the Community Connector and Evergreen Station Area).
- Include the following measures related to park and rides: utilize thoughtful urban design to maintain the human scale and pedestrian friendly feel of downtown Vancouver. Avoid hindering access for walking, biking, small mobility devices, bus, paratransit, and other alternative forms of mobility.
- Clarify that the IBR team will be responsible for the relocation of the Boat of Discovery art installation in collaboration with the art owner, City staff, and Port of Vancouver staff (refer to Page 4-34).
- Consider and incorporate the following affirmed and potential recommendations from the CBAG:
    - Create designs that prioritize preservation and enhancement of natural features, focusing on the views both from and towards the bridge while working within the constraints of the bridge structure to maintain structural integrity and safety.

    - Include viewpoints or designated areas for cyclists and pedestrians on the bridge to enhance their experience and safety.
    - Integrate art and local history and culture into the bridges and program area designs, at various scales, to enhance its aesthetic appeal and connection to the community.
    - Create a distinct and iconic bridge.
    - Consider design with an eye toward ice and other severe weather conditions.
    - Include accountability to ensure that various contractors are adhering to the aesthetic and design specifications to create consistent design throughout the program area.
    - Consider functionality in the design to create a space that builds community and connection.
    - Incorporate desirable design elements in a consistent manner throughout the program area, such as textured acoustic walls and articulated bridge columns, ensuring both large- and small-scale aesthetic and functional details.
    - Include rich landscaping of plants and flowers that will both beautify the space and make it a desirable destination.
- Acknowledge that parking structures would likely be seen an adverse visual change to the cultural or project environment in Downtown Vancouver (even with a thoughtful process that complies with the City's design standards and guidelines and involves the community).
- To address concerns by residents of the Esther Short neighborhood near I-5, clarify the changes to views from Smith Tower and other buildings that currently have views of the river.
- Add more photosimulations and key viewpoints in the entire program area within Vancouver for all design options for greater visual representation of potential opportunities and impacts.
- Residents of neighborhoods close to the freeway are concerned about the visual impact of new and reconstructed noise walls. Staff supports the following mitigations, based on recommendations from the Arnada Neighborhood Association, CBAG, and City of Vancouver Parks and Recreation Advisory Commission.
    - Provide the highest standard anti-graffiti coating available at the time of its construction. Ensure funding for graffiti removal for at least 25 years from date of completion.
    - Work with the City, neighborhood associations, and community in general to develop the final designs for the sound walls.
    - Design walls to be aesthetically pleasing.

3.10 Air Quality (Air Quality Technical Report)

- Include more information about the health impacts of transportation-related pollution. Specifically, transportation is a significant contributor to air pollution-related illnesses and premature death. Emissions from vehicles can lead to respiratory, cardiovascular, neurodegenerative, and metabolic diseases, as well as cancer and reproductive issues.
- The Draft SEIS assumes significant decreases in traffic-related pollution due to federal regulations on fuels and vehicle efficiency. Furthermore, the air quality analysis is based on regional data and refers to a small number of existing monitoring sites in Vancouver. Explain how IBR will monitor air quality to ensure consistency with this finding for the program area over the long-term, and how IBR would mitigate emissions, if monitoring indicates that air quality in the program does not improve to the expected levels by 2045. Clarify the plan to mitigate long-term air pollution from highway traffic in that event.
- Table 3-8 in the Air Quality report lists sensitive receptors near the program footprint. All 16 are located in Vancouver, including hospitals, schools, and assisted living facilities. Additional analysis is needed to understand the exposure to mobile source air toxics under the future scenarios and to identify measures that would reduce potential health impacts due to freeway pollution. This may include installing monitoring stations for toxic air contaminants at sensitive receptors in Vancouver.
- Update the analysis to address the following City of Vancouver Condition of Approval: Active transportation facilities shall be designed to minimize users' exposure to roadway pollutants such as particulate matter and hazardous chemical compounds.
    - Install monitoring stations along pathways and parks located along the freeway, so people can understand the health hazards of exposure to unfiltered freeway air.
- Add a more explicit disclaimer that Motor Vehicle Emissions Simulator (MOVES) calculates emissions, not air concentrations that can be compared to health benchmarks or standards. It follows that if emissions go down, so do air concentrations, but it is not necessarily a 1:1 correlation.
- Provide additional analysis of construction-related air quality impacts to residents living within or near the program area, acknowledging that this population is already exposed to higher pollution from the freeway. It is not adequate to exclusively use the Dan Ryan Expressway as a proxy; analyze the specifics of the program area's context.
- Clarify the specific temporary impacts anticipated for the large construction staging areas and for each of the design options.

- In Section 7.2.2 of the Air Quality report, change the program-specific mitigation from “encourage” to “require” to ensure that contractors minimize impacts to surrounding communities.
- Evaluate and consider the following recommendations related to air quality provided in the Executive Summary of the IBR Health Analysis (Attachment F):
    - Improve greenspace and tree canopy cover to improve air and water quality, provide shade, and increase natural spaces.
    - Meet and exceed, where possible, state and local requirements to reduce noise and air pollution to protect the health of workers and community members.
    - Protect workers and community members on high-risk days for high heat and poor air quality events.
    - 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.
    - Expand information about potential air quality, safety, and connectivity impacts of construction.
    - Compile and release to the public additional information about potential air quality, safety, and connectivity impacts of tolling-related traffic diversion through neighborhoods.
- Ensure the final design improves flow of traffic to minimize congestion and environmental impacts of idling.
- Denote Vancouver's Climate Action Framework in the Final EIS as further evidence of strong political support for climate action and established citywide policies to address the impacts of climate change.

3.11 Noise & Vibration (Noise & Vibration Technical Rpt.)

- The City supports proposed mitigation measures, including installation of sound walls along the freeway to reduce impacts to the extent practical. Design and construct with as minimal impact to buildings as possible.
- The Noise and Vibration report finds that “traffic noise levels would approach or exceed the NAC at one office and an outdoor use area at the Vancouver Community Library” and that noise mitigation at this site is not feasible because the residential equivalent use at this site was calculated as one residence while WSDOT feasibility requires a minimum of three first row impacted receivers to benefit from a noise wall. The parking lot and vacant parcels adjacent to the Library are owned by the City and this site is referred to as “Library Square.” The plan is to develop this site with high density uses and to complement the adjacent light rail station at Evergreen Boulevard and the Community Connector. One objective of the Connector is to buffer the negative impacts of the freeway, including traffic noise.

    - Analyze the potential for the Community Connector to reduce noise levels at the library and future residential uses on the Library Square site.
    - Identify other potential measures that could reduce noise levels at this location, for consideration as plans for Library Square progress.
- Residents living along the freeway in Vancouver are concerned about the potential impacts to their homes from construction vibration, which is discussed in Sections 5.1.2 and 7.9.2.1 of the Noise and Vibration report. The Draft SEIS analysis is based on US DOT guidelines, which recommends the maximum peak particle velocity (PPV) levels remain below 0.5 inches per second at the nearest structures. The Draft SEIS finds that vibration associated with certain activities could reach this threshold within 100 feet of sensitive receivers, and that there is the potential for vibration damage to "fragile buildings and structures" at levels less than 0.5 in/sec PPV. The discussion of contractor requirements in section 5.1.2.1 does not match the regulatory requirements in section 7.9.2.1, and the potential impact may not be fully mitigated by the requirement to monitor.
    - Confirm regulatory requirements for fragile buildings and structures and align the discussions in sections 5.1.2.1 and 7.9.2.1.
    - Clarify what would happen if monitoring finds that construction is exceeding the thresholds or if vibration causes architectural or structural damage.
    - Refer to comments in Cultural and Section 106 sections for additional comments on potential impact to historic structures.
- The Noise and Vibration Report finds that "shared-use path users would have more exposure to noise from highway vehicles [under the single-level bridge configuration] than with the [double deck option] due to reduced shielding between the shared-use path and highway traffic.
    - Include program-specific mitigations to address this impact, consistent with the CBAG recommendation to reduce highway noise for all bridge users, including pedestrians and cyclists.
- Evaluate and consider the following noise-related recommendations provided in the Executive Summary of the IBR Health Analysis (Attachment F):
    - Meet and exceed, where possible, state and local requirements to reduce noise and air pollution to protect the health of workers and community members.
    - 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.

3.12 Energy (Energy Technical Rpt.)

- The analysis of construction-related effects is based on one set of assumptions related to construction materials and equipment. Section 7.2.2 (Program-Specific Mitigation) includes: "Continue to consider advances in energy-reducing and/or

energy-saving materials and methods." Provide data on the differences in energy consumption and greenhouse gas (GHG) emissions between the various materials and equipment that could be used, to inform decision-making about which materials and methods to advance.

- Coordinate with the City's Electric Vehicle (EV) Infrastructure Strategy to further incentive EV use through IBR's mitigation and community benefits. This is consistent with CBAG's recommendation to: "Incentivize the installation of electric charging stations in the construction zone for contractor use to meet EV requirements. These charging stations are to be placed so that they may become convenient public facilities after construction is complete and ongoing operations and ownership is determined."

3.13 Electric and Magnetic Fields (Electric and Magnetic Fields Technical Rpt.)

Staff does not have any comments on this chapter/report.

3.14 Water Quality and Hydrology (Water Quality and Hydrology Technical Rpt.)

- The City of Vancouver has over 400 acres of impervious surfaces that drain into the I-5 corridor to existing WSDOT stormwater facilities that outfall to the Columbia River. The Water Quality and Hydrology chapter mentions the contributions to the stormwater system from the program area; however, it does not recognize contributions from outside of the program area.
    - Delineate the outside contributing area from City of Vancouver to the existing WSDOT conveyance facilities. The City can provide additional GIS or other data to assist in this delineation.
    - Ensure that any stormwater conveyance or treatment facilities that will be constructed or replaced by the program are sized to accommodate the total volume of anticipated flows, including flows from inside and outside of the project area.
- The Water Quality and Hydrology chapter states that infiltration is the preferred option for stormwater runoff mitigation; however, infiltration rates in the area may not be sufficient to infiltrate all stormwater from the project and outside contributing areas. Infiltration of the project runoff will also require close adherence to Vancouver Municipal Code 14.26 – Water Resources Protection Ordinance to ensure that groundwater is protected from potentially mobilized contaminants. If infiltration is proposed, a Critical Aquifer Recharge Area (CARA) technical report may be required.
    - Provide a CARA technical report outlining how infiltration within the project area will not negatively impact the underlying aquifer once stormwater design has progressed to detailed design.

3.15 Wetlands (Wetlands Technical Rpt.)

- See Attachment D for administrative comments on this chapter.

3.16 Ecosystems (Ecosystems Technical Rpt.)

- The City's Urban Forestry Management Plan (UFMP) recommends direction and actions for Vancouver to optimize the benefits of trees by envisioning an equitable, climate adaptive, integrated, and sustainable approach to managing the city's urban forest resources over the next twenty-five years. Action 3.1D.9 states: "utilize long-lived, large form, drought-tolerant, climate-resilient native planting and retention of mature trees". Action 1.3C.10 and 12 addresses removing and controlling invasive species on public properties. The City's Climate Action Framework (CAF) is a blueprint to reduce greenhouse gas emission and build resiliency to climate change impacts. CAF Strategy NS-1, states to increase carbon storage in trees, vegetation and soil. Accordingly, the Climate and Ecosystems chapters should include the following measures:
    - Continue to work with City staff to design program elements in support of the City's Climate Action Framework and Urban Forestry Management Plan.
    - IBR contractors should eradicate invasive species prior to and during construction in the program footprint, such as English ivy, Tree of Heaven, Black Locusts and blackberry.
    - Utilize native, climate adaptive vegetation, long-lived, large form, and drought-tolerant, trees in new landscape areas.
    - Incorporate native or climate adaptive conifers to reflect the gateway to the Evergreen State.
- Explore opportunities to plant replacement trees in the program area as soon as possible (pre-completion) so that those trees can begin to establish and provide the intended mitigation.
- Explore partnerships with landscaping and naturescaping groups to rehome trees that can't be saved.
- Consider use of pollinator practices in the new landscaping.

3.17 Geology and Groundwater (Geology and Groundwater Technical Rpt.)

- The Geology and Groundwater chapter implies that the City of Vancouver Safe Drinking Water Act (SDWA) monitoring is a characteristic assessment of groundwater quality. This is misleading because shallow groundwater monitoring data indicate contamination of groundwater due to the infiltration of personal care products, ineffective septic systems, and polluted runoff. Infiltration in the program area at the proposed scope and scale will likely impact both shallow and deep hydrogeology, potentially mobilizing contaminants to travel towards drinking water sources in new ways. Furthermore, the DSEIS states that the City is meeting SDWA standards, but the City has recently violated SDWA standards for per- and polyfluoroalkyl substances (PFAS) at several sources and for different analytes. The City is implementing treatment systems to address the violations, but the sources

of our drinking water are not pristine. Accordingly, the City's Strategic Plan includes this goal and strategy: "To ensure Vancouver's drinking water is safe for the community, the public works department will monitor PFAS concentrations and invest in treatment systems that reduce PFAS in drinking water in order to meet federal drinking water regulations and reduce the concentration of PFAS in drinking water by the end of 2028." Developing new sources of drinking water that are shallower and more abundant will mean more vulnerability to shallow infiltration of pollution, particularly persistent compounds like PFAS, as well as potential shifts in groundwater flow regimes.

    - Update the analysis to reflect the potential for the construction of the Modified LPA and long-term operations to contaminate drinking water sources and modify groundwater patterns.
        - Analyze the localized effects to supply wells in the area not just the City of Vancouver for the short-term and long-term. Use publicly available data to model various scenarios of infiltration rates.
        - Mitigate any potential contamination to meet applicable standards.
- The DSEIS states "there is no evidence of notable erosion or landslides in the study area." However, the Clark County maps show "severe erosion risk areas" and slopes exceeding 25% in the vicinity of the I-5/SR-500 interchange (see Attachment H).
    - Update the analysis to reflect the County's maps on soil and landslide hazards, analyzing the potential impacts from construction and operation of the Modified LPA.

3.18 Hazardous Materials (Hazardous Materials Technical Rpt.)

- Consider smoke management in the selection of the bridge configuration and subsequent design phases, maintain fire-fighting water supply and emergency vehicle access throughout construction, and enable VPD access to construction zones if needed. Closed-truss construction would require smoke management, while open-truss construction on a lower deck creates limited emergency access conditions. The National Fire Protection Association (NFPA) issues standards for addressing these issues.
    - Design the new bridged to comply with NFPA 502: Standard for Road Tunnels, Bridges, and Other Limited Access Highways, including but not limited to the standards listed in Attachment D (Administrative Staff Comments).

3.19 Climate Change (Climate Change Technical Rpt.)

- City staff appreciates the IBR program's focus on climate resiliency and mitigation overall. The Draft SEIS shows how the Modified LPA aims to mitigate transportation-related emissions with strategies to reduce vehicle miles

traveled, enhance multimodal transportation options, and shift trips to clean, non-polluting sources. This reinforces several of the City's Desired Outcomes and Conditions of Approval for the Modified LPA (see Attachment B). Staff also appreciates the references to the City's Climate Action Framework, which established the following targets:
    - 80% reduction in GHG by municipal operations by 2025
    - 80% reduction in GHG emissions by the Vancouver community by 2030
    - Carbon neutrality by both municipal operations and the Vancouver community by 2040
- In Section 3.19.1 of the Climate chapter (Changes or New Information Since 2013):
    - update the reference to Vancouver's Climate Action Framework to also note the interim goal of 80% reduction in communitywide emissions by 2030.
    - include mentions of the City of Vancouver's 2024 – 2044 Transportation System Plan (TSP) and the 2023-29 Vancouver Strategic Plan.
- Update the introduction to the Climate chapter to clarify the human-caused origins of GHG emissions and the connection between fossil fuel combustion in automobiles and freight, as well as high-energy intensity building materials like steel and concrete. This will set the context for the project's contribution to climate change and the mitigation efforts that must be made.
- As noted in Table 8-1 of the Climate Report, the City made Conditions of Approval to define a GHG reduction target, monitor GHG emissions, and provide regular reports on the status of GHG mitigation efforts.
    - Establish an ongoing program to monitor volume of vehicles and active transportation modes across the bridge and report results annually to Metro and RTC for inclusion in transportation and air quality modeling.
    - Reserve funding for a long-term (10-year) research project, to be conducted by a local college or university in Oregon or Washington (such as the Transportation Research and Education Center (TREC) or National Institute for Transportation and Communities (NITC) programs at Portland State University). This research would evaluate how the modeled outcomes for GHG and other air pollutants compare to actual observed results over time. The ultimate goal would be to publish the findings in a peer-reviewed journal and present them at a national conference, such as the Transportation Research Board (TRB) Annual Meeting, exploring any factors contributing to significant discrepancies between the modeled and observed outcomes.
- Include wildfire smoke's impact on traffic visibility as a climatic factor.
- Discuss impacts to construction workers due to extreme weather events.

- Consider and incorporate into the mitigation the following CBAG recommendation: use material options that are sustainable and environmentally friendly (balancing decisions to use low carbon materials, costs, and life of materials) into the program design, including local elements (examples include ash and shells). Consider other emissions as well.

3.20 Environmental Justice

- The discussion on noise and vibration impacts in the Environmental Justice (EJ) report is inconsistent with the Noise and Vibration report with respect to Vancouver's three neighborhoods that meet EJ thresholds (Esther Short, Arnada, and Rose Village). It incorrectly states that there would be a substantial noise impact in Rose Village. Based on the Noise Report, the substantial impact would be west of the freeway in the Shumway neighborhood.
    - Update Sections 4.6 and 7.1.1.2 and Table 4-3 in the EJ report to align the findings with the Noise and Vibration report and to summarize the effects on EJ populations in Washington neighborhoods (i.e., traffic noise impacts and recommended noise walls in all three EJ areas, as well as impacts from light rail noise and vibration in Esther Short, with associated mitigation).
- The EJ analysis is focused on the three Vancouver neighborhoods that have high concentrations of EJ populations relative to the region. This approach overlooks EJ populations living in other neighborhoods within Vancouver. It also assumes an even distribution across the neighborhood or block group, which overlook possible concentrations of EJ populations within that area and can lead to the inaccurate conclusion that effects on EJ populations are the same as the general population. There is particular concern about underestimating impacts to lower-income people living adjacent to the freeway (where it is likely that property values are lower and housing is less expensive). The "No Thresholds" approach described in Section 2.6.6.1 is intended to account for this limitation in the quantitative approach. For example, section 2.6.6.1 states that "a community-based organization or social service group that primarily serves EJ populations may exist within a neighborhood that otherwise has a low proportion of low-income and minority residents". Given that people seek out and access resources and opportunities outside of their neighborhoods, the analysis of impacts to community resources should look beyond those located in EJ areas. However, the EJ report only describes the "No Thresholds" approach in the Methods section and does not specify which impacts use this approach, nor apply it to all impacts where it would be most suitable.
    - Use the "No Thresholds" approach to analyze impacts that span a larger geographic scale than EJ neighborhoods (tolling, indirect displacement, and community resources). The study areas should include: the entire catchment area for people that would normally take I-5 to cross the river to evaluate tolling impacts, block groups that are within a 15-minute bike or

bus ride to evaluate the potential for indirect displacement, and the secondary EJ study area to evaluate impacts to community resources.
    - Use the "No Thresholds" approach to analyze impacts at a small geographic scale than the neighborhood (acquisitions, traffic noise, and construction-related impacts). A No Thresholds approach could lead to the finding of disproportionately high and adverse impacts to EJ populations living along the freeway, particularly for full acquisitions/displacements, traffic noise that is not mitigated, and construction-related noise and air quality effects. EJ populations and other sensitive populations living near the freeway are already disproportionately impacted by noise and air pollution.
    - Include mitigation measures to reduce and avoid impacts to EJ populations, based on updated findings using the "No Thresholds" approach. Ensure these communities are not disproportionately impacted by construction activities.
- Section 7.2.2 of the EJ report states that "interruptions to traffic, bus, light-rail service, and cross-river bicycle and pedestrian facilities would result in a disproportionately high and adverse effect on EJ populations" and that "disruptions to peak period and daytime travel on I-5 are proposed to be mitigated through construction best practices, such as scheduling construction activities during nighttime hours and on weekends with approval by ODOT and/or WSDOT." This measure can have the unintended consequence of disproportionately affecting shift workers that need to travel on nights and weekends. Studies indicate that women and people of color are more likely to work night shifts in US manufacturing jobs. This concern reinforces the Equity Advisory Group (EAG) recommendation to "consider the disproportionate impacts that congestion can have on people working long hours or multiple shifts, workers who often must adhere to strict shift schedules, and parents—particularly single parents" (Section 4.3.2 of the Equity Report).
    - Analyze the potential effects of nighttime and weekend closures of transportation facilities on shift workers.
    - Identify large employers in the secondary study area that utilize shift work to understand employee needs.
    - During construction, inform employers and workers of significant traffic pattern changes.
    - In addition to the proposed mitigation, consider offering free rides by transit across the river when the shared use path on the bridge is fully closed.
- In the EJ report, describe the participation of Tribal governments in the identification and mitigation of archaeological resources.
- The EJ and Equity reports note several times how equity priority communities have a greater reliance on modes besides driving. Therefore, under the No-Build Alternative, EJ populations and other equity priority communities would experience

disproportionate impacts resulting from the insufficiencies in the transportation system that will only get worse over time. This includes issues with transit access, frequency, reliability, and travel times, as well as the safety and connectivity of the active transportation network.
    - Update the finding for the No-Build Alternative in the long-term effects section of the EJ report to acknowledge the disproportionately high and adverse effect on EJ populations of that scenario.
- Tolling: There is broad concern about the equity impacts of the tolling program as discussed in section 5.2 of the Equity Report and 4.7 of the EJ report. One of the City Desired Outcomes is to "Implement tolling in an equitable manner that includes mitigation programs."
    - Advocate to the Bi-state Tolling Subcommittee and Transportation Commissions to implement a low-income toll program when tolling begins on the existing bridge.
    - Encourage them to consider a discount program for people with a disability or chronic illness.
    - Offer technical assistance and multilingual support to help enroll qualified people into the low-income tolling program.
- Section 6.2 of the EJ report states: "Even if low-income renters faced adverse effects, it is not clear that such effects would be disproportionate, as rising rent levels can also displace middle income earners. Renters as a group typically move with some regularity…" Staff disagrees with these statements. The tolling analysis acknowledges that increases in transportation costs as a share of household income have a disproportionate impact on low-income populations. Given that housing costs make up the largest share of household costs (followed by transportation), the same premise would apply here. Increases in rent would have a disproportionate effect on lower-income renters. The point about renters moving with some regularity is in part because of their financial vulnerabilities to market conditions - it should not be used to justify a finding of no disproportionate impact. While "the vast majority of affordable rental properties in Vancouver would not experience indirect effects from the Modified LPA", it could also affect housing prices along the Vine routes due to the high frequency, direct connections to the light rail stations, which would affect EJ populations in neighborhoods along the routes. In Section 6.2:
    - Acknowledge the potential for the Modified LPA to contribute to increased housing prices and rents in Vancouver – particularly areas within a 15-minute walk, bike, or bus ride to the light rail stations, recognizing that many factors influence housing prices and it would not be possible to quantify the exact contribution from the program.
    - Acknowledge the disproportionately high and adverse impact that would occur to EJ populations due to increased housing prices resulting at least in part from the Modified LPA.

    - Elaborate on the other City and regional programs for increasing the supply of affordable housing and for supporting renters vulnerable to displacement, such as the City's Affordable Housing Fund.
    - As mitigation, explore and implement anti-displacement and community stabilization measures, building upon the City of Vancouver's equitable development and anti-displacement policies, strategies, and community engagement models.
- The EJ report includes an extensive description of the Program's community engagement activities completed since 2020. Ongoing outreach and engagement will be critical to meeting the Program's equity goals and commitments, as well as the City's Desired Outcomes and Conditions of Approval related to equity and community engagement, such as prioritizing "historically marginalized and underserved communities within Program area to establish objectives, design, implement and evaluation of success of project".
    - In Section 2.5.2.1, describe how successful engagement activities were in reaching EJ communities. Provide a demographic breakdown of participants where possible.
    - Continue to work with equity priorities communities to amplify potential benefits, understand potential impacts, and define possible mitigations and community benefits.
    - Focus on providing clear, accessible, and transparent communication and culturally specific engagement.

3.21 Section 6(f) and Federal Lands to Parks (FLP)

- Continue consultation with NPS and the City to discuss mitigations relative to potential FLP impacts at Marshall Park and Old Apple Tree Park.

3.22 Aviation (Aviation Technical Report)

- The City has been working with IBR and the Federal Aviation Administration (FAA) to develop conceptual plans intended to minimize impacts to aviation operations of Pearson Field, given the constraints and trade-offs. Staff supports the Modified LPA and agrees with the Draft SEIS findings and proposed mitigation measures in the Draft SEIS. However, there is concern about the height of construction cranes and potential penetration of air space during construction.
    - Clarify in the program-specific mitigation measure the intent to communicate with the pilots at Pearson Field about the timing and duration of construction activity that will impact flight patterns – in addition to FAA's practice of issuing "Notice to Air Missions".
    - Continue to collaborate with staff and aviation stakeholders to define any necessary mitigations.

3.23 Cumulative Effects (Cumulative Technical Rpt.)

- In Section 2.5 of the Cumulative Effects report, call out and summarize the Main Street Promise, Fourth Plain Boulevard and Fort Vancouver Way Safety and Mobility Project, and 29th and 33rd Streets Safety and Mobility Project (see Attachment I for additional information). While the Main Street project is incorporated in the Regional Transportation Plan (RTP), it should be described in this section explicitly to provide context for its mentions later in the report.
    - Clarify how these projects would relate to the IBR program.
    - Continue to coordinate with City staff and design the IBR program elements to tie into these improvements.
- The analysis of temporary effects in the Cumulative Effects report finds that "If construction of future projects does occur simultaneously with IBR Program–related construction, adverse cumulative effects would be temporary and minimized through construction coordination between ODOT, WSDOT, and other agencies." Staff concurs that coordination will be essential to minimizing cumulative effects. It will be important for the IBR program to have up-to-date construction timelines for the approved development and transportation projects listed in the Cumulative Effects and Land Use reports.
    - Prior to finalizing construction plans for each phase, confirm the construction timelines for the approved development and transportation projects listed in the Cumulative Effects and Land Use reports.
    - Coordinate traffic control plans, business assistance strategies, emergency response plans, and other construction management tools with City staff.
    - Notify emergency service providers of any street and freeway closures, even during off business hours. Identify any detours or short-term alternate routes, particularly for routes serving hospitals, senior living facilities, and other locations with relatively high needs.
- Maximize workforce development opportunities including but not limited to apprenticeships and pre-construction education and recruitment with emphasis on equitable outcomes for historically disadvantaged communities.

Chapter 4 – Draft Section 4(f) Evaluation

Based on the section 4(f) determination criteria, the de minimus impact finding for Old Apple Tree Park is acceptable to City staff, with the following measures:

- Keep the park open during construction.
- Confine construction to the western and northern portion of the park.
- Continue discussions with City staff about the permanent alignment of the shared use path from Main Street, the connections to existing paths, and the overall park footprint. Ensure that the Final SEIS provides enough flexibility for the new path's

alignment, while providing the environmental clearance to move forward into final design and construction.
- Minimize any tree root impact with the path and all construction.

Based on the section 4(f) determination criteria, the de minimus impact finding for Marshall Park is acceptable to City staff, with the following measures:

- Keep the park open during construction.
- Continue discussions with City staff about the mitigation for permanent impacts, including a recreational feature as potential replacement for the impact to the horseshoe pits, as agreed to by the City.
- Ensure that the Mayor's Grove trees are adequately protected and/or mitigated in consultation with City.

Design Options

This section summarizes City staff's current position on Design Options, based on the analysis provided in the Draft SEIS and additional information for purposes of putting in the record.

Westward Shift

- The Draft SEIS describes additional acquisition and displacement on the east side of I-5 in Downtown that would be required to shift the centerline of I-5 to the west, and possible corresponding reduction in impacts to archaeological resources on the east side. The relative benefit and avoidance of impacts to archaeological impacts are not defined in the report and, with that, the City does not support shifting the centerline of I-5 to the west.
- Clarify what changes in local planning resulted in the proposed westerly shift and what the objective of this shift is.

Park and Ride Options

- The City supports and reiterates the comments submitted by the City's Parking Advisory Committee and the City Center Redevelopment Authority (CCRA). These letters, which are included in Attachment C, reflect community concerns about the potential for park and ride structures in Downtown Vancouver.
- Continue to work with the City to define the number of park and ride spaces as soon as possible.
- Evaluate the potential to use existing parking spaces to the maximum extent possible.
    - Work with the City to develop a dispersed parking program that connects transit riders to the existing supply, building upon the Downtown Access, Mobility, and Parking Plan toolkit under development.

    - Prioritize locations that would be least impactful to the station areas and Downtown in general, while still achieving the access needs and complying with Federal Transit Administration's grant funding criteria.
    - Consider City-owned lots within the walkshed of the station areas.
- Compare 0, 1, or 2 new facilities, considering the differences between existing and new structures, below- or above-ground structures, and shared use and single use facilities.
- Provide a more detailed analysis on the potential transportation, climate, land use, economic, visual, neighborhood, and equity/environmental justice effects resulting from new, large parking structures.
    - Clarify impacts to the operations of local streets in Downtown resulting from the park and rides, especially during peak hours.
    - Discuss consistency of park and rides with Vancouver's Climate Action Framework in Table B-7 of the Climate Change report.
    - Elaborate on the alignment with City goals for Downtown to be walkable, transit-oriented, safe, and vibrant.
    - Clarify the mitigation measures in each report/chapter to address the potential for adverse impacts resulting from park and rides.
    - Work with City staff to identify and minimize potential conflicts between modes and associated safety and traffic flow issues that may arise due to the provision of park and rides facilities, if any are required.
- Consider the opportunity costs of building a new parking structure compared to using the existing parking supply to meet demand and developing another use on the park and ride sites.
- Remove the Waterfront Gateway park and ride site from further consideration.
- Lower the assumed number of parking spaces that could be accommodated on the Library Square site to reflect the City's vision for the site (pedestrian-oriented with high density development).
- Continue to work with City staff and the community to analyze the appropriate level and design of park and ride for any/all sites that may be required. Design must be high quality, human-scaled environment that prioritizes access by active transportation modes (walking, biking, etc.) and by bus and paratransit.
- The community has questions about how shared use facilities would work. For example, if park and ride lots are only for transit rides and parking there is free or reduced cost compared to other lots in the area, then people could purchase a ticket for transit but not actually take transit, providing them with cheap parking in a prime location in Downtown Vancouver and undermining the City's parking management system.
    - When developing any shared use agreements, consider how to regulate the usage of parking lots by various user groups, such as local employees and

visitors to Downtown Vancouver. This includes the pricing structure and enforcement.

- Consider the potential to expand carpooling and shuttle services from park and ride lots outside of Downtown Vancouver.
- Across all reports and chapters, ensure the descriptor of the park and ride design option reflects the potential for the Modified LPA to include up to two park and rides (rather than saying the Modified LPA will or does include two park and rides).

C Street Ramps

- The City supports retaining C Street ramp connections to I-5. The findings of the Transportation technical report show that without these connections there would be multiple adverse impacts. For example, as described in section 4.6.4.2, six intersections would fail to meet the relevant intersection performance standards under the AM or PM peak period. Congestion would impact the Mill Plain Boulevard and 15th Street couplet (a primary freight corridor), as well as transit service that operates in the downtown area. Retention of C Street ramps would enable direct access to and from Downtown and discourage cut through traffic. The placement of these ramp connections is not anticipated to result in a significant visual barrier as there will already be major structural elements associated with the westbound SR-14 to southbound I-5 ramp as well as the structure that will carry the light transit rail lines through interchange areas.
- For the "No C Street Ramps" option, provide a detailed analysis of possible mitigations for the six failing intersections. Work with the City to identify feasible mitigation efforts, if any, considering right-of-way constraints, safety factors, and other potential impacts on the surroundings. It is unclear what is meant by "the final design phase" in section 7.1.6.2 (Program-specific mitigation for the "Without C Street Ramps" option). It is important to understanding if the impacts of this option can be mitigated, prior to selecting an option for the Final SEIS; it is not acceptable to punt the selection of final mitigation to a later design phase.

Bridge Configuration

Based on the evaluation of potential impacts and benefits of bridge configurations, City staff prefers the single-level fixed span. Compared to the double deck option, the single-level option would:

- provide better access and design from a fire and life safety perspective,
- have less intrusion into Pearson Field protected airspace due to the lower maximum bridge height,
- benefit freight movement and active transportation users due to the reduced grade compared with stacked bridge option, and
- have slightly lower air quality, energy, and GHG impacts due to the reduced acceleration and braking of vehicles.

Overall, the impacts associated with the additional width of the light rail guideway and shared-use path would be incremental. Therefore, it is staff's current position that the benefits would be worth the trade-offs, particularly with the proposed mitigation.

Compared to the movable span option, the fixed span option would eliminate issues with the current lift configuration, including traffic delays, unpredictability, disruptions to transit service and active transportation trips, and associated impacts to freight and air quality. The movable span would also require higher capital and operating costs and would intrude more into Pearson Field airspace, compared to the fixed span options. As described under Navigation above, the City encourages IBR to continue advocating for a United States Coast Guard Preliminary Navigation Clearance Determination and permit to enable the fixed span.

Auxiliary Lanes

City staff supports the Modified LPA, which includes one auxiliary lane through the program area. A second auxiliary lane would only provide modest benefits in the southbound direction during the AM peak due to bottlenecks at the I-405 and I-84 interchanges. While benefits of a second auxiliary lane would be greater for the northbound direction in the PM peak period, it would require narrowing the width of the outer shoulders to minimize the width of the freeway and associated property acquisitions. The Two Auxiliary Lane option would also result in slightly higher VMT, compared to the One Auxiliary Lane option.

- Auxiliary lanes must be designed with advanced technologies and methods to reduce congestion time and length, particularly for the northbound lanes, and to do the same for potential safety improvements.
- Clarify where exactly auxiliary lanes would be implemented, including scale and length. For example, define where they might be extended beyond the Columbia River bridge crossing such as short extensions to accommodate safer access from interchange areas to I-5 mainline.
- Clarify the width of the shoulder lane under a two auxiliary lane option and how the narrower width would affect bus on shoulder service, freight movement, emergency access and incident response, and use of the shoulders for drivers that need to pull over.
- Clarify specific acquisition needs and property impacts under the single-level fixed-span and two auxiliary lane configurations with C Street Ramps and I-5 centerline.

Attachments:

A. Comments from The Historic Trust (supported by City of Vancouver)
B. City of Vancouver's Desired Outcomes and Conditions of Approval for the Modified LPA, IBR Commitments
C. Summary of feedback on the Draft SEIS from City of Vancouver Advisory Bodies and general public
    a. Comment letter from the Parking Advisory Committee
    b. Comment letter from the City Center Redevelopment Authority
D. Administrative Comments by Chapter/Report (spreadsheet)
E. Guiding principles for the Community Connector and Evergreen Station Area (updated to reflect feedback from community leaders and interested parties in August 2024)
F. Executive Summary: Health Analysis of the Interstate Bridge Replacement Program
G. Summary of feedback from people with disabilities and accessibility-oriented leaders
H. Geologic Hazard maps created from Clark County website
I. Fact Sheets for Main Street Promise, Fourth Plain Safety and Mobility Project, and 29th and 33rd Streets Safety and Mobility Project,

Attachment A: Comments from The Historic Trust (supported by City of Vancouver)

THE HISTORIC TRUST

November 18, 2024

Interstate Bridge Replacement Program
Attn: Draft SEIS Public Comment
500 Broadway, Suite 200
Vancouver, WA 98660

VIA Email: draftseis@interstatebridge.org

Dear Interstate Bridge Replacement Program staff,

Please find following the comments of The Historic Trust on the Interstate Bridge Replacement (IBR) Project Draft Supplemental Environmental Impact Statement (DSEIS) in regard to project impacts on the Vancouver National Historic Reserve Historic District (VNHR Historic District), which encompasses the Vancouver Barracks and Officers Row historic districts. The new bridge will improve regional transportation and commerce, and provide a seismically-safe river crossing which will be of benefit to the entire Interstate 5 corridor. The Trust appreciates the opportunity to participate in the DSEIS review process.

As manager of city-owned properties at the VNHR, the Trust is committed to excellent stewardship of the historic districts therein for community benefit in the present and to pass them on to the future. The Trust also recognizes the cumulative, and in many cases permanent, effects of this very large undertaking and emphasizes the imperative to work on behalf of the community for the best possible outcomes for preservation of cultural resources. The VNHR Historic District offers to the public educational, commercial, recreational, community observance, and aesthetic enjoyment opportunities. The Trust looks forward to continuing to work with City of Vancouver staff, IBR project staff, and fellow stakeholders to protect cultural resources and mitigate adverse effects by developing and implementing meaningful, cost-effective, and long-lasting measures that will preserve the irreplaceable historic buildings and spaces of the VNHR Historic District for continuing public engagement and use.

We are happy to provide additional information and answer questions. Thank you for your review and for the coming responses.

Best regards,

Temple Lentz, President/CEO
360-992-1805

Attachment A

THE HISTORIC TRUST
CELEBRATION · EDUCATION · PRESERVATION

Comments on the Interstate Bridge Replacement Project Draft Supplemental Environmental Impact Statement

November 18, 2024

Introduction

The Interstate Bridge Replacement (IBR) project will provide the region with a significantly improved and seismically-sound crossing over the Columbia River. The Historic Trust (THT) supports this important project and welcomes the opportunity to comment on the Draft Supplemental Environmental Impact Statement (DSEIS), and the coming bridge.

The primary focus of the comments will be on the City of Vancouver (COV)-owned properties as THT manages them for the City via a lease arrangement. However, the THT supports the mitigation requested by the National Park Service and values their review of Reserve archaeological impacts. THT is not commenting on the "No Build Alternative." As part of the joint management of the Vancouver National Historic Reserve, knowledgeable National Park Service staff will provide necessary archaeology-related comments through partnership with THT and a standing agreement with the COV.

The following comments address project impacts on the Vancouver National Historic Reserve Historic District (VNHRHD), which encompasses the Vancouver Barracks and Officers Row historic districts. Effects include property acquisitions and auditory, atmospheric, vibration, and visual intrusions. The Trust also recognizes the cumulative, and in many cases permanent, effects of this very large undertaking and emphasizes the logical and efficient imperative to work together with the IBR project on behalf of the community for the best possible outcomes for preservation of cultural resources.

Additionally, THT advocates strongly for enhancement of the community connector (I-5 lid) between downtown Vancouver and the VNHRHD. The connector is a crucial step to ensure the most seamless link possible between two important public areas which were connected historically and are today comprehensively used by local residents and out-of-town visitors for commerce, education, housing, recreation, and heritage tourism.

An overall concern in reviewing the DSEIS is that the maps tend to be very difficult to interpret, even when enlarged electronically. It is challenging for viewers to provide effective comments as one often cannot determine with certainty where the borders are because the lines are sometimes blurry, and the layers difficult to distinguish.

THT continues to appreciate the opportunity to comment on project planning documents and values continued collaboration with project staff and regional partners.

Mitigation for Adverse Effects

Investment of mitigation funding in standing buildings is greatly needed and will produce very publicly-visible and impactful results. Direct physical preservation is long-term and will most effectively mitigate temporary, permanent, and cumulative impacts of new bridge construction.

For the highest level of public benefits of edification, enjoyment, and engagement associated with cultural resources, mitigation for the temporary and permanent project impacts must be implemented both within and judiciously beyond the Area of Potential Effect (APE). THT proposes a group discussion with IBR staff to determine the most meaningful, cost-effective and long-lasting ways of applying mitigation funding to the buildings in the VNHR Historic District.

Comments

Section 3.7 Parks and Recreation

The acquisition of acreage to be acquired for the MLPA within the FVNHS will permanently impact the park, and by extension the larger VNHRD. An increase in noise will affect people's educational, recreational, commercial, and residential uses of the Reserve. THT supports mitigation acceptable to the National Park Service and City of Vancouver that is commensurate with the effects of construction noise, vibration, glare, changes in views, and dust, the permanent loss of land, and heightened noise levels over time from increased traffic.

Section 3.8 Cultural Resources

The following comments concern the Vancouver National Historic Reserve Historic District (WA 1357), which incorporates Vancouver Barracks Historic District (WA 1358), and Officers Row Historic District (WA 918), Washington State Patrol District Five Headquarters (WA 1148), and the Vancouver Barracks National Cemetery (WA 1319).

All versions of bridge construction plans and post-construction operation, other than the "No Build" option on which THT is not commenting, will impact the Vancouver National Historic Reserve Historic District (VNHRHD). These include temporary vibratory, audible, visual, and atmospheric effects during construction, and cumulative post-construction permanent audible, visual, and atmospheric effects from increased traffic and change of setting and viewshed. As noted in Table 3.8-7, all of these areas will experience Adverse Effects. THT is concerned about the designation of No Adverse Effect for WA 1148, the Washington State Patrol District Five Headquarters. Because of its immediate proximity to Interstate 5, vibratory and atmospheric, and increases in traffic noise will occur.

3.8.1 – Changes or New Information Since 2013
p. 3.8-4
While it is a welcome change to divide the Vancouver National Historic Reserve into multiple historic districts and a site, especially given multiple owners, additional recognition should be given in this introductory section to the many resources within each of them in terms of applying mitigation. Suggest adding this sentence between "…National Historic Site" and "Portions of the VNHR…": Each district and the site encompasses multiple resources.

3.8.2 – Existing Conditions

"Washington," page 3.8-10, second (first full) paragraph: needs to be expanded for accuracy and clarity.

Suggested edits:

Following the Oregon Treaty of 1846 which set the boundary between then-British Canada and the United States at the 49th parallel, the Hudson's Bay Company's (HBC) Fort Vancouver area came under the jurisdiction of the United States. In 1849, the U.S. Army arrived and established Camp Columbia, eventually named Vancouver Barracks, the first American military post in the Northwest. The following year, the Army surveyed boundaries for a military reservation that encompassed Fort Vancouver within its 2,560 acres. The military reserve was gradually reduced in size to the area roughly bounded today by the Columbia River to the south, the remnants of East Reserve Street, West Reserve Street/Interstate 5, and Fourth Plain Boulevard to the north.

Following the final departure of HBC operations in 1860, the reservation remained exclusively in use by the American military until the late 1940s, when surplus operations began following the conclusion of World War II. A large portion remained in use by the Army, while other sections were transferred to various other public entities, such as the Veterans Administration and the Vancouver School District. A portion in the southern part of the reserve known through archaeological testing to contain the HBC stockade area was designated in 1948 as the Fort Vancouver National Monument (FVNM) and transferred to the National Park Service. The boundaries of the FVNM were expanded in 1961 to include all of what is now the Vancouver portion of the Fort Vancouver National Historic Site (FVNHS). Ownership of Officers Row was transferred to the City of Vancouver in 1984, the Howard House in 1995, and most of the West Barracks in 2007 – all rehabilitated by the City and partners such as the Vancouver Area Development Authority and The Historic Trust. Following many decades of diminishing use, the Army completed its departure from Vancouver Barracks in 2012.

Paragraph 5, p. 3.8-11

Edits for clarification of last three lines:
The 366-acre Vancouver National Historic Reserve (VNHR) was established by the U.S. Congress in 1996, and encompassed, in terms of the current boundaries of the APE, Officers Row, FVNHS, the West Barracks (still in Army ownership at that time), Pearson Airfield, and portions of the Columbia River waterfront. Management partners designated in the legislation were the City of Vancouver, National Park Service, State of Washington, and the Army. The Army's partnership concluded in 2012 with its final departure from Vancouver Barracks.

"Washington"
p. 3.8-10

Second paragraph, line 8 reference to Kanaka Village should state that its development began in 1829 rather than 1827.

"Historic Built Environment Resources - Washington"
p. 3.8-14

Paragraph 6 - Change final sentence to "These properties, several of which contain multiple resources, are summarized..."

p. 3.8-18

Figure 3.8-3, Interstate Historic Built Environment Resources, incorrectly labels the entire southern portion of APE to the east of the freeway as Fort Vancouver National Historic Site. That area is not entirely owned by the National Park Service. Rather, it should be labeled Vancouver National Historic Reserve. An alternative term also used locally is Fort Vancouver National Site to distinguish the entirety from the smaller National Historic Site.

p. 3.8-20 Table 3.8-5

WA 1357 - VNHRHD – Incorrectly identifies period of construction as starting in 1824. The Hudson's Bay Company did not build in this area until 1829.

WA 918 - Officers Row Historic District - Incorrectly identifies period of construction as concluding in 1903. The final building dates to 1906. Description would be more correct if changed to: Historic district consisting of 21 buildings constructed by the U.S. Army for residential and administrative purposes.

WA 1358 – Description would be more correct if changed to: Historic district consisting of 23 buildings constructed by the U.S. Army.

p. 3.8-23

On Figure 3.8-4, it is very difficult to ascertain the boundary of the VNHR. Perhaps make the border a darker brown?

3.8.3 Direct Effects

"Modified LPA - Historic Built Environment Resources"

p. 3.8-27 Vancouver National Historic Reserve Historic District (WA 1357)
THT is concerned that adverse effects identified such as construction vibrations, increase of noise from construction and ongoing freeway operations will negatively impact ability to rent nearby Trust-managed residential, commercial, and event spaces, and share associated educational opportunities with the community. THT's ability to preserve and maintain the buildings and site for the community will be hampered through loss of revenue. Those buildings are primarily the NCO duplexes which are located at the upper right of each inset maps of Figure 3.8-7 on page 3.8-29.

p. 3.8-30 Figure 3.8-8 – Design Options Comparison (WA 1357)
THT is concerned that identified adverse effects on WA 1357 North and WA 1358 also shown on the map such as construction vibrations, increase of noise from construction and ongoing freeway operations will negatively impact the organization's ability to share residential, commercial, event, and open spaces and their associated educational opportunities with the community. Thus, the ability to preserve and maintain the buildings and site will be hampered through loss of rental revenue and learning opportunities will be reduced.

THT is also concerned about physical impacts to the buildings from construction location and vibrations. The Post Hospital (WA 1358) and NCO duplexes (WA 1358 and WA 1357) are constructed of unreinforced masonry. The NCO duplexes of special concern are the ones closest to the freeway – 602/604 Barnes Road and 400/402 Hatheway. All but one of the wood-frame

Officers Row buildings north of Evergreen Blvd. and west of Fort Vancouver Way (WA 1357) have unreinforced brick foundations.

All options will have the most significant impacts on properties closest to the route, including the Post Hospital, western NCO duplexes, and western Officers Row.

pp. 3.8-35 – 37 Table 3.8-9 Direct Effects of the Modified LPA on Washington Historic Built Environment Resources

WA 1357 – VNHR Historic District, WA 918-Officers Row Historic District, and WA 1358-Vancouver Barracks Historic District

Identified Adverse Effects on the Historic Reserve overall include Army roadway demolition, construction vibrations, including those from installation of tieback anchors, roadbed upgrades, temporary increase in dust from construction, permanent changes to setting affecting views, and temporary and permanent changes to noise level, and are of concern from THT's perspective and will require mitigation.

Vibration monitors must be installed to track any changes to COV-owned site buildings, and property owners must have access to all data. An agreement is needed to stipulate that the project provides complete compensation for needed repairs, and that repairs must be done to Secretary of Interior Standards for the Treatment of Historic Properties.

Sound walls will be needed to ameliorate the increases in noise levels. COV and THT must play a contributing role in determination of height and appearance. The wall must be coated by the project with the most effective graffiti deterrent product available at time of construction, and a project-funded reserve established at the COV to pay for graffiti removal for 25 years.

3.8.5 Program Planning

pp. 3.8-43 to 44 WA 918
THT is concerned that monitoring for 500 feet will not be sufficient as some of the buildings are constructed of unreinforced masonry and/or have URM foundations. Area for monitoring construction vibrations should be extended eastward to include the 1849-built Grant House, to ensure that the site's oldest building is adequately monitored and protected. Though vibration damage risk may be minimal, the building is irreplaceable and is a foundational piece of Pacific Northwest, American military, and Vancouver, Washington, history.

3.8.6 Mitigation and Programmatic Agreement

THT will continue to participate in the Programmatic Agreement development process, and urges application of mitigation not only to places and spaces within the APE, but also historic buildings that are in reasonable adjacency.

p. 3.8-44 Paragraph 4

In the second to last paragraph, third line from bottom there is something awkward. Perhaps "phased" should be phase?

WA 1357 and 1358 - Post Hospital

Though full project impacts are not yet known, it is a realistic assumption the Post Hospital will be significantly adversely affected by construction of the project. The building's extremely close proximity to project route and unreinforced masonry construction make it exceedingly likely that project vibrations will cause irreparable harm. Loss of the irreplaceable building would greatly affect the historical interpretation of the site as it is of unique design and was critical for many years to the functioning of the barracks. Loss of such a large building set prominently on a rise would also **significantly affect views** of the western border within the site and **would eliminate a noise barrier** between I-5 and the interior of the VNHR. Because the hospital is currently used by THT's maintenance crew for production of building materials for preservation on site and other maintenance tasks, an alternative location would also be needed for their work. These impacts are notable and, without proper mitigation, the adverse result is unacceptable.

Because the former hospital, however, has not been thoroughly studied and considered, informed decisions cannot yet be made about its future.

To properly evaluate the future of the Post Hospital and mitigate for adverse effects, the IBR Project must make specific reference to and inclusion of the Post Hospital in the Programmatic Agreement for mitigation of historic and cultural resources that are protected under Section 106. Specific language for that document is proposed below and will also be proposed separately as comment for that document's concurrent comment period.

To summarize:
Prior to start of construction, IBR project will fund a study to determine the potential and cost assumptions for seismic stabilization and reinforcement, rehabilitation, and re-use.

- If re-use is feasible, the study must then fund a substantial public engagement process for potential re-use.

- If the building can be successfully and feasibly seismically stabilized and rehabilitated, the project will contribute substantial funding for protection during construction, rehabilitation, and re-use.

- If the building cannot feasibly be rehabilitated, the project will mitigate its loss by funding removal of hazardous substances, deconstruction, and salvage. The project will fund a public engagement process to envision new uses of the space, and design and construction of a new building.

For use in Programmatic Agreement:

Post Hospital – Historic Building Retrofit, Rehabilitation, Salvage, or Removal

I. Seismic Retrofit and Rehabilitation Feasibility Assessment

- WSDOT and ODOT, in coordination with FHWA, FTA, City of Vancouver (COV), and The Historic Trust (THT), will hire a contractor

- to prepare the Seismic Retrofit and Rehabilitation Feasibility Assessment.
- The Seismic Retrofit and Rehabilitation Feasibility Assessment will include recommendations regarding prudence and feasibility of seismic retrofit and rehabilitation of the Post Hospital. Considerations will include but not be limited to selected Project alignment and proximity of Project during and after construction and financial feasibility.
- A delivery schedule for review and submittal of the Seismic Retrofit and Rehabilitation Feasibility Assessment will be developed in coordination with the COV and THT.
- WSDOT and ODOT will oversee implementation of the following scope of work:
  - WSDOT and ODOT, in coordination with FHWA, FTA, COV and THT, will deliver the draft Seismic Retrofit and Rehabilitation Feasibility Assessment for review by DAHP, NPS, the Tribes, and other consulting parties;
  - WSDOT and ODOT will deliver the final Feasibility Assessment to FHWA, FTA, COV and THT after considering comments from DAHP, NPS, the Tribes, and other consulting parties; and
  - WSDOT and ODOT will distribute the final assessment to DAHP, NPS, the Tribes, and other consulting parties.

- The final Seismic Retrofit and Rehabilitation Feasibility Assessment will be completed by WSDOT and ODOT in coordination with FHWA, FTA, COV and THT prior to the demolition of the property. The decision to proceed with a Seismic Retrofit and Rehabilitation Plan will be made by WSDOT and ODOT in coordination with FHWA, FTA, COV and THT.
- COV, as property owner, will be a signatory on all documents.

II. Strengthen and Retrofit Plan

- If through the Salvage and Reuse Feasibility Assessment WSDOT and ODOT, in coordination with FHWA, FTA, COV and THT, determine that strengthening and retrofitting the building is prudent and feasible, WSDOT and ODOT will direct the preparation of a Strengthen and Retrofit Plan. The Strengthen and Retrofit Plan will be prepared and implemented prior to the beginning of construction in the area near the property.
- The Strengthen and Retrofit Plan will include a public process for consideration of prudent and responsible future uses of the building.
- WSDOT and ODOT will plan for and manage the completion of work relating to seismic retrofit, preservation of historic fabric, and disposal of any hazardous materials.
- The Project will make a significant contribution to costs for interior retrofit of the building to suit the determined future use.
- COV, as property owner, will be a signatory on all documents.

III. Salvage and Reuse Plan

- If through the Salvage and Reuse Feasibility Assessment WSDOT and ODOT in coordination with FHWA, FTA, COV and THT determine the building cannot be saved for strengthen and retrofit but that salvage and reuse is prudent and feasible, WSDOT and ODOT will direct the preparation of a Salvage and Reuse Plan. The Salvage and Reuse Plan will be prepared and implemented prior to the demolition.
- The Salvage and Reuse Plan will provide a proposed approach for salvage and reuse implementation.
- Preference will be given first to the COV retaining ownership and reuse of these materials and second to retaining public use of these materials within public spaces or structures in or adjacent to the VNHR and third, to public ownership and reuse of these materials within public spaces or structures outside the VNHR. If reuse in these manners is found to be infeasible, or additional public entities demonstrate no interest in salvage or reuse, WSDOT and ODOT, in coordination with FHWA, FTA, COV and THT, may also explore the opportunity for reuse by the general public.
- Implementation of the Salvage and Reuse Plan will consider:
  - If the property is salvaged, WSDOT and ODOT will plan for and dispose of any resultant hazardous materials.
  - If no party that is willing and able to salvage and reuse property components is identified within six months of WSDOT and ODOT's initial advertising availability, WSDOT and ODOT will notify COV, THT, and consulting parties.
  - If no party that is willing and able to acquire and relocate the property within six months of WSDOT and ODOT's initial advertising of availability, and the assessment and cost proposal has determined salvage is feasible, WSDOT and ODOT will deconstruct the structure and will ensure that small structural elements are available for reuse and will make availability of these known through appropriate media.
- WSDOT and ODOT will oversee the implementation of the following scope of work:
  - WSDOT and ODOT will deliver the draft Salvage and Reuse Plan for review by FHWA, FTA, DAHP, COV and THT.
  - WSDOT and ODOT will deliver the final Salvage and Reuse Plan to FHWA, FTA, COV and THT after considering comments from DAHP, NPS, the Tribes, and other consulting parties.
  - WSDOT and ODOT will distribute the final Salvage and Reuse Plan to DAHP, NPS, the Tribes, and other consulting parties.
  - COV, as property owner, will be a signatory on all documents, not a consulting party.

Section 3.9 Visual Quality

The Historic Reserve portion of the Greater Central Park Landscape Unit attracts all portions of the population identified in the DSEIS as being influenced by visual character – local and

regional residents, and tourists. Those users utilize all forms of transportation stipulated – motorized vehicles, bicycles, public transit, and pedestrian, as well as mobility assistance devices such as motorized wheelchairs, skateboards, Segways, scooters, and similar.

THT concurs that the overall effect on visual quality will be adverse.

P. 3.9-4 Table 3.9-2
The Visual Character description of Greater Central Park should be changed from: "Park-like campus and open fields crossed by several major roadways and elevated railroad tracks. Recreation- and education-oriented development" to: Park-like campus and open fields crossed by several major roadways and elevated railroad tracks. Recreation- and education-oriented development. Area includes historic districts relating to early British fur-trading and later U.S. Army usage. Buildings and grounds in the Officers Row and the West Barracks have residential, retail, commercial, recreational, community commemoration, and educational uses, and versatile event venues.

P. 3.9-6 Table 3.9-3
Viewer groups for Greater Central Park should also include Residential, Educational, Retail/Commercial, and Civic.

P. 3.9-18 Greater Central Park Landscape Unit
The first sentence notes that many views are currently blocked by existing vegetation. As this project will have visual impacts for many decades into the future, consideration must be given to how views will change when that vegetation, such as trees, dies or is removed for other reasons in the future. Mitigation must include a fund for future landscape screening. Project construction may result in the removal of vegetation, as noted on p. 3.9-25, which will require replacement immediately.

P. 3.9-22 Table 3.9-8 Greater Central Park Landscape Unit Degree of Impact on Visual Quality

In addition to the impacts noted, the removal of the Post Hospital, should that be necessary, would immensely impact the "cultural order" category and raise the degree of impact to 7.

P. 3.9-27 3.9.5 Indirect Effects
Description of the Greater Central Park Landscape Unit should also include West Vancouver Barracks.

3.9.6 Potential Avoidance, Minimization, and Mitigation Measures
p. 3.9-27 Regulatory Requirements, bullet one – add design standards for all of Central Park and those specific to the VNHR.

Place-Specific Mitigation
P. 3.9-29 – Greater Central Park Landscape Unit

Add:
Vancouver National Historic Reserve
Consult and comply with Vancouver Central Park and Vancouver National Historic Reserve design standards for period-appropriate landscape screening and replacements of vegetation as needed.

The western edge of the VNHR will be affected by the design of the new connector between downtown Vancouver and the Reserve. Mitigation can include appropriate plantings and vegetative screening as necessary to enhance the visual and experiential qualities of the connector, and views to and from it.

3.9-30 Mitigation for Temporary Effects

Add:
Place-Specific Mitigation
Greater Central Park Landscape Unit

- Communicate responsibly and pro-actively with site managers at the VNHR (THT and National Park Service) about intrusive temporary impacts and their duration.

  Throughout construction near the COV-owned buildings at the VNHR, THT needs as much advance notice as possible of impacts such as noise, dust, and glare, and their expected duration, so that staff can keep commercial and residential tenants and event venue renters apprised, and time and plan the organization's community events as carefully as possible.

Section 3.10 Air Quality

Page 3.10-15 Mitigation for Temporary Effects

Add:
Place-Specific Mitigation
Greater Central Park Landscape Unit

- Communicate responsibly and pro-actively with site managers at the Vancouver National Historic Reserve (The Historic Trust and National Park Service) about intrusive temporary impacts and their duration.

  Throughout construction near the City of Vancouver-owned buildings at the Vancouver National Historic Reserve, The Historic Trust needs as much advance notice as possible of impacts such as extra dust, and its expected duration, so that staff can keep commercial and residential tenants and event venue renters apprised, and time and plan the organization's events as carefully as possible.

Section 3.11 Noise and Vibration

As section 3.1.1 Noise Environment of the *Noise and Vibration Technical Report* notes on pages 3.11-1 and 3.11-11, the VNHRHD is located in an area where noise levels are already significant from all the sources mentioned, and increases are predicted on p. 3.11-13, no matter which alternative is eventually implemented. Additionally, noise is expected to increase over time due to additional traffic. THT is therefore concerned about how increases will affect the residential, commercial, recreational, and educational uses of the site by tenants and the visiting public. Mitigation will be required.

Throughout construction near the City of Vancouver-owned buildings at the Vancouver National Historic Reserve, THT needs as much advance notice as possible of impacts such as increased

noise and vibrations, and their expected duration. Trust staff must apprise commercial and residential tenants and event venue renters of same, and time and plan the organization's own public events as carefully as possible.

Figures 3.11-7 and 3.11.8, pp. 3.11-18 and 3.11-19 and p. 3.11-24 Fort Vancouver – Modified LPA Modeled Traffic Noise Levels

The expected traffic noise impacts recorded at receptor FV-018 near the NCO duplexes will negatively affect those residing there, and possibly those working in or hosting events at the nearby Red Cross Building and Artillery Barracks. Figure 3.11-8 adds areas of special concern at FV-002, FV-003, FV-004, and FV-005 which are located by buildings adaptively re-used for commercial rentals, and the Police Headquarters.

Mitigation in the form of a sound wall and screening vegetation will be necessary. Sound wall design and vegetation will conform with design guidelines for the VNHR Historic District. THT will participate in the sound wall design planning and in vegetation selection. If it proves:

- necessary to vacate the residential and commercial rental properties during construction, and/or not schedule events in the venues, the IBR project must compensate for the loss in revenue, and

- impossible to rent any of the affected units at a rate which is sufficient to provide enough revenue to properly maintain the buildings and event venues, IBR project must provide funding to compensate for the loss.

Noise monitoring should continue throughout construction and beyond to determine actual level of impact. IBR project will provide the THT access to the information produced by the monitoring, discuss the results, and provide any necessary restitution for losses in revenue.

p. 3.11-24
The VNHR offices referred to in the "Fort Vancouver" section at or near FV-002, 3, 4, and 5 each contain multiple tenants. Change text to: …noise levels would be above the WSDOT NAC at two residences and four total office buildings, each of which contains multiple tenants…

Construction Vibration p. 3.11-33
THT continues to be concerned regarding construction vibration negatively impacting buildings on the western edge of the VNHR, particularly those west of Fort Vancouver Way. Especial concerns are raised regarding the URM Post Hospital, brick NCO duplexes, and all the buildings with brick foundations west of Fort Vancouver Way.

Vibration monitoring should continue throughout construction and beyond to determine actual level of impact and be extended into the VNHR at least as far as 1101 Evergreen Blvd., the Grant House. IBR project will provide THT access to the information produced by the monitoring, discuss the results, and provide any necessary restitution for losses in revenue due to disruption and/or damage from vibrations.

3.11-6 Potential Avoidance, Minimization, and Mitigation Measures

THT requests consideration of a noise wall south of Evergreen Blvd.

P. 3.11-36 Table 3.11-13 Noise Wall Analysis Summary

11A – The noise wall described here would seem to be a reasonable mitigation measure. Concerns include whether 6 ft. is high enough and/or 464 ft. is long enough. As manager of property close to the wall, THT must be included to consult on wall design and appearance, and vegetative screening which complies with landscape guidelines for the historic area. Another concern is how sound will pass over the wall, and how far into the historic district it will travel. Existing signage at the edge of the freeway indicates the location of Officers Row, and helps draw visitors and business clients into the historic area. Loss of the sign will need to be mitigated with another means of drawing people in which fits well with the IBR project.

P. 3.11-38

The concluding sentence states that balloting of benefitted receptors will take place. THT needs additional information on the process as to how it is decided who votes, and how to provide input on same.

P. 3.11-53 Construction Vibration

Bullet 2: The number of feet should not be the sole consideration for how far monitoring extends to the east. The type of buildings and building materials must be taken into consideration. For example, buildings with brick foundations should be monitored. All construction-related vibration must be monitored for historic structures in proximity to the project to determine if cumulative effects of all the vibration are occurring.

3.23 Cumulative Effects

3.23.-11 Land Use and Economic Activity

The Land Use and Economic Activity section should contain a paragraph about the Vancouver Barracks Post Hospital, owned by the City of Vancouver, in the VNHR Historic District. The project's Adverse Effects will greatly affect the economic future of the former hospital.

Similarly, the overall Adverse Effect for the Vancouver National Historic Reserve will impact the city-owned buildings there. Noise, vibration, visual, and atmospheric effects during construction, and permanent increased noise and visual changes after construction, will affect people's decisions as to whether or not to rent commercial and residential spaces and event venues. Rental revenue is a critical component in enabling appropriate maintenance and preservation of these historic buildings, and being able to pass them on to the future.

This section should also make reference to the planned community connector, which will positively stimulate heightened economic activities in downtown and the Historic Reserve and synergistically link the two areas.

P. 3.23-20 – Parks and Recreation Cumulative Effects

Evaluation of the increased access to the public recreational, educational, residential, and business activities of Officers Row and the West Barracks at the Vancouver National Historic

Reserve should include studies to most effectively place, and potentially increase directional signage on the freeway, at transit stations, and at the community connector under development between downtown Vancouver and the Reserve.

P. 3.23-22

The Historic Built Environment section must contain a specific reference to the adversely-effected Vancouver Barracks Post Hospital. The eastern edge of the IBR project will greatly affect to what extent the building can be preserved and re-used.Loss of the building would negatively permanently affect the number of buildings available for public use and interpretive education, and the visual qualities of the site.

Paragraph 5: Aegis/Providence Academy redevelopment is incorrect. The Aegis project name changed to Aeon. The Aeon project was not built in conjunction with Providence Academy.

Paragraph 6: The most public-facing way to mitigate the negative effects of the project on historic resources is to invest in structural and aesthetic preservation of them. Presently, the projected mitigation is documentation-heavy and structural preservation-light. Public engagement with historic resources will be most benefited by actions to help save the buildings, continue to adaptively re-use them, and pass them on to future generations.

P. 3.23.23 Cumulative Effects

Conclusion – Historic Built Environment
Paragraphs 2, 3, and 4 all refer to the Adverse Effects of the Modified LPA on historic resources. The most effective way to ameliorate those effects is to direct mitigation efforts toward keeping existing buildings standing and historically-preserved for public usage for businesses, housing, education, and enjoyment.

Visual Quality

P. 3.23-23

The potential loss of the historic Vancouver Barracks Post Hospital needs to be taken into consideration in terms of project impacts on visual quality. This large, imposing building is an important part of local history, and also provides a visual edge to the western side of the West Barracks area. Demolition and replacement would have a significant impact on any viewer.

Noise and Vibration

The Post Hospital specifically has played an unofficial role as a noise barrier. Should this building be removed due to construction impacts, the resulting noise increase will affect the entire western side of the Historic Reserve.

P. 3.23-26 Paragraph 2

The importance of the Vancouver National Historic Reserve in civic life must be specifically recognized and accounted for. To accomplish this, change: "Many residences and other uses in

the study area, including those adjacent to I-5 and the proposed light-rail transit line, have experienced increasing noise levels over time..." to "Many residences and other uses in the study area, including those adjacent to I-5 and the proposed light-rail transit line such as the recreational, commercial, residential, and educational opportunities at the Vancouver National Historic Reserve, have experienced increasing noise levels over time ..."

P. 3.23-26 Cumulative Effects Conclusion – Noise and Vibration

THT is extremely concerned about the short-term construction and permanents impacts of increased noise and vibration on the Vancouver National Historic Reserve, and looks forward to continuing to work on mitigating them.

Energy

Cumulative Effects Conclusion - Energy

P. 3.23-29 Paragraph 5

THT is interested in helping reduce local energy demand by instituting such measures as installation of roof-top solar panels where feasible, such as on the roof of the Police Headquarters Building, and instituting other energy conservation measures that do not impact, or have justifiable impacts, on historic structures. Discussions regarding how energy conservation measures could be part of the mitigation of Adverse Effects on the Historic Reserve would be beneficial for the public.

P. 3.23-41 Climate Change

THT is seeking to explore how the Vancouver National Historic Reserve can contribute to reduction of GHG. The environmental advantages of re-using buildings, "the greenest building is one that is already built," and thus continuing the use of old-growth timber that has already been harvested, are already inherent in the historic districts. However, measures to increase energy conservation in building operations and produce energy with roof-top solar panels are items to discuss as both beneficial for the environment and applicable to mitigation.

Section 4F

P. 4-11 Inset map of Figure 4-1

This map incorrectly identifies the Artillery Barracks as the Post Hospital. The hospital is farther to the west right by the freeway, west of the Red Cross Building and by the Interstate 5 shield.

P. 4-13 Figure 4-3

The U.S. Army no longer owns any land at the Vancouver National Historic Reserve. The property identified as belonging to the Army is National Park Service property.

P. 4-16, Paragraph 1
The U.S. Army is no longer a partner in site operations, having entirely vacated in 2011. Remove reference to the Department of the Army as a site management partner.

P. 4-20 Figure 4-8

Correction needed to more clearly delineate the VNHR. It is difficult to see all the brown outlines and brown underlay indicating the VNHR. People who are unfamiliar with the area will find it challenging to see where it is.

Whereas the name of Fort Vancouver National Historic Site is in generally the correct location, including just one name incorrectly implies that there is one sole owner of the area. The figure would be clearer with additional owners indicated.

P. 4-24 Chapter 4, WA 368, 369, 918, 109

The description is not as clear as it could be. Edits below.

The VNHR is an NRHP-listed historic district that encompasses 397.7 acres and includes four listed or determined eligible historic districts and one historic site which all include multiple historic and cultural resources. Of the 397.7 acres within the VNHR boundary, 49.74 acres were WSDOT highway right of way at the time of listing of the reserve and do not contribute to eligibility. The Fort Vancouver National Historic Site was first established as a national monument in 1948, and was elevated to an historic site in 1966 to preserve and interpret historically significant and exceptionally complex overlapping areas associated with Native American, Hudson's Bay Company, U.S. military, and NPS uses of land that have occurred over time. The VNHR was created by an act of Congress in 1996.

P. 4-25 WA 1148

The patrol headquarters was built in 1979, not 1975.

Section 4-5

P. 4-52 – Paragraph 4

Concluding sentence does not include the section number of the evaluation.

P. 4-52 – Paragraph 6

The Discovery Walk Festival no longer occurs.

P. 4-53 – Paragraph 4

Second line – The Fort Vancouver NHS does not include the entire Vancouver Barracks Historic District. A rephrasing is needed: Fort Vancouver NHS includes part of the Vancouver Barracks Historic District determined eligible in 1984. Those elements include the HBC….

P. 4-108

The first sentence of the description incorrectly implies that there are five total historic properties. Though the quantity is addressed in the next paragraph, a more accurate statement for this introductory paragraph would be: The VNHR Historic District is an NRHP-listed historic

district that encompasses 397.7 acres and includes one historic site and four NRHP-listed or determined eligible historic districts which each contain multiple historic resources …

P. 4-109 Figure 4-39

This figure would be clearer with additional information indicating ownership.

P. 4-110 Paragraph 5

The Trust is concerned that vibrations from installation of the tie-back anchors at the northwest corner might harm the historic structures in that area.

P. 4-111 Paragraph 1 and following bullet points.

The IBR Program will cumulatively adversely affect the entire VNHR. The list of contributing properties should include all historic resources within the VNHR. The permanent incorporation of land will impair the likelihood of rehabilitation of the Post Hospital. Loss of the Post Hospital will have a negative historic effect on the site, and also mean that a barrier to sound entering the site will be lost and noise will increase for visitors, tenants, and event venue users.

Pp. 4-111 and -112

Vibrations – THT is concerned about the adverse effects of vibrations on the VNHR, especially the buildings from the Grant House west.

P. 4-112

Aesthetics - Views from additional buildings should be taken into account. For example, people on the second stories of buildings on Officers Row and in the West Barracks will likely be able to see the IBR. Additionally, as trees change over time whether through pruning, removal, or replacement with small ones, the views will change.

p. 4-113

Noise – THT is concerned that increased noise levels will result in lowered public interest in renting residential, commercial, and event spaces. Loss of rental income will impair the ability of the Trust and the City of Vancouver to be excellent maintenance stewards of the buildings. Recreational and educational aspects of the site will be diminished for the public as extra noise will affect enjoyment of such site activities as walking and biking and taking walking tours.

P. 4-121, Bullet Point (ii)

THT urges inclusion of a robust public process in making decisions about the Post Hospital and has made comments to this effect on Chapter 3.8 and the draft Programmatic Agreement.

P. 4-128

All design options will result in permanent incorporation of VNHR property into the project and increase of noise, and temporary vibratory impacts on VNHR buildings. The final line of

paragraph 7 does not indicate sufficient mitigation. The national significance of the property and value to the community require more than "standard" mitigation. THT urges mitigation that focuses on building stability and other measures for long-term physical preservation in recognition of permanent and cumulative site impacts.

P. 4-129

The final line of paragraph 5 indicates that noise mitigation is not reasonable. Options other than demolition of the Normandy Apartments must be explored so that the increase of noise can be mitigated. If the noise cannot reasonably be mitigated, comparable mitigation should be applied elsewhere within the APE or reasonably adjacent to the APE to help amend the cumulative and permanent damage to the site.

P. 4-129 Paragraph 5

Condition inspection of the Post Hospital must take place well ahead of start of project construction so that proper planning for, and public engagement about, rehabilitation or removal can be efficient and effective.

P. 4-134 Paragraph 3

The final line of paragraph 3 should be changed to: There would be visual and noise effects on recreational and educational opportunity users, commercial and residential tenants, and event venue renters at the Fort Vancouver NHS and the City of Vancouver-owned properties in the VNHR historic district managed by THT.

P. 4-135 Paragraph 1

The note that the majority of historic sites are NRHP-eligible at the local level does not take into account the multiplicity of resources within the VNHR, all of which are listed in the NRHP at the national level of significance.

P. 4-135 Section 4.6.4

The Vancouver National Historic Reserve was created by an act of Congress in 1996 in addition to the Fort Vancouver National Historic Site being created by an act of Congress.

P. 4-140 Paragraph 1

It is important to note here the significance and lasting import of a well-designed community connector between downtown Vancouver and the VNHR in contributing to neighborhood access and mobility between these important civic locales.

P. 4-145 Paragraph 1

THT looks forward to being an active partner in determining what mitigation results from the project in terms of achieving the most public good through historic building preservation utilizing reasonable public expenditure.

Visual Quality Technical Report

Page 2-12 2.4.2.1 Types of Neighbors

Types of viewers at VNHRT include residential, recreational, civic, retail, and commercial.

2.4.2.2 Types of Travelers

The VNHR attracts all types of travelers listed: motoring, bicycle, and pedestrian.

P. 3-3 3.1.2 Regulatory Context

The list does not include any of the governing documents for the VNHRT.

P. 3-4 3.1.3.2 Key Viewpoints

While it is not possible as noted in the Key Viewpoints section description to assess every view, Figure 3.2 on page 3-6 shows only a small number of viewpoints which does not seem sufficient to capture the complexity of views in different areas. Suggest at minimum adding three more view evaluations from Evergreen Blvd. and Ft. Vancouver Way looking west, from the second floor porch of the Grant House looking west, and McClellan Avenue and Ft. Vancouver Way looking west. The upper floor of the Grant House should provide perspective on what will be visible above the trees, and offer an opportunity to assess what the view will be as the height of trees will change over time. In regard to the possibility of the loss of the Post Hospital which forms a barrier between the Reserve and the new construction associated with the bridge, consideration must be given to what the westward view from the Reserve will be if this large building is gone.

Noise and Vibration Technical Report

Suggest that title be changed to "Considering the importance of our natural and cultural environment" or some other phrasing to indicate that the built environment is part of the study.

P. 3-3 3.2.4 Fort Vancouver Land Use

This paragraph incorrectly states that the O.O. Howard House is part of the Officers Row National Historic District. Rather, it is part of the Vancouver National Historic Reserve and Vancouver Barracks historic districts.

P. 3-11 Figure 3.7

Modelling should be done to determine to what degree the noise level will increase at the VNHR Historic District if the Post Hospital is removed.

Attachment B: City of Vancouver's Desired Outcomes and Conditions of Approval for the Mo Commitments

	Category	Item
		City of Vancouver Desired Outcomes
1	Overall	Meet or exceed climate and equity goals as defined by the city, region, and IBRP advisory g the program
2	The Built Environment	Construct the bridge and all related structures to be resilient in the event of a Cascadia Seis
3	The Built Environment	Support efforts to make current and future Downtown Vancouver a thriving and attractive within the greater Portland-Vancouver region
4	The Built Environment	Improve connectivity for all users among key downtown and Historic Reserve destinations and placemaking opportunities
5	The Built Environment	Extend Main Street to the Vancouver waterfront and identify additional opportunities to re roadways within the bridge influence area
6	The Built Environment	Improve access to transit for all users
7	The Built Environment	Improve access and connectivity throughout local bikeway, roadway, and sidewalk systems
8	The Built Environment	Improve multimodal access and connectivity to, from, and across the Interstate 5 regional Downtown Vancouver and the Historic Reserve area
9	The Built Environment	Include a dedicated guideway for transit that accommodates multiple high capacity transit serve both current and future transit needs as the region grows
10	The Built Environment	Replace and/or upgrade subsurface City assets where appropriate to support new infrastru
11	Urban Design	Prioritize the movement of people, freight, and goods
12	Urban Design	Emphasize and center human and natural systems
13	Urban Design	Integrate and recognize the IBRP area's history, especially that of Indigenous Peoples
14	Urban Design	Better connect the west side of Interstate 5, the City's core downtown area, with the east s City's Historic Reserve area, via a lid or some other public open space over Interstate 5 sou connecting Library Square to the Historic Reserve

Attachment B

	Category	Item
15	Urban Design	Create new public open spaces under the bridge that serve the region's diverse and growin Vancouver's waterfront, and integrate with existing and forthcoming open space investmer
16	Urban Design	Establish continuity and integration of design associated with transit improvements that co future downtown transit investments
17	Urban Design	Integrate new aesthetic features to amplify Vancouver and associated bridge improvement destinations
18	Mobility	Focus on efficient, connected, and safe movement of people, freight, and goods
19	Mobility	Provide more reliable travel for all modes and all users
20	Mobility	Reduce overall Interstate Bridge congestion and length of peak congestion periods includin
21	Mobility	Reduce peak period impacts on the local road system
22	Mobility	Reduce collisions on local roads leading to and within downtown
23	Mobility	Incorporate tolling to fund construction of the Bridge and associated elements
24	Mobility	Retain three through travel lanes on Interstate 5 in the Bridge Influence Area and, based or accompanying auxiliary lanes to support the Program's Purpose and Need
25	Construction, Operations & Maintenance	Meet or exceed requirements to employ Minority, Women, and Disadvantaged Business Er
26	Construction, Operations & Maintenance	Create opportunities for inter-generational wealth through workforce investment program and construction phases of the program
27	Construction, Operations & Maintenance	Implement tolling in an equitable manner that includes mitigation programs
28	Construction, Operations & Maintenance	Proactively mitigate construction impacts to Downtown Vancouver businesses, residents, a
29	Construction, Operations & Maintenance	Efficiently manage post-construction operating and maintenance costs
30	Construction, Operations & Maintenance	Use climate smart construction materials built for existing and future types of transportatio

Attachment B

		City of Vancouver Modified Locally Preferred Alternative - Conditions of Approv
31	Community & Stakeholder Engagement	Engagement must be accessible and open to a wide variety of stakeholders and all commun
32	Climate	In collaboration with Program partners define a GHG reduction goal that is Program-specifi regional, and local GHG emission reduction goals, including the City's goal of carbon neutra
33	Climate	The GHG analysis committed to by IBR Program shall include data related to changes in tra and induced demand), modeled vehicle miles traveled at years 2030, 2040, 2050, and assu consistent with Oregon and Washington State Departments of Transportation toll program
34	Climate	Collaborate with Partners to define mitigation strategies for urban heat island effects and a Program infrastructure and vehicular traffic .
35	Climate	Prepare and present a plan that shows how Program-related GHG will be monitored and re construction, and how it will be mitigated plus funding options for mitigations. There shall progress, with annual reporting on status of GHG target and mitigation efforts to offset em
36	Equity	The IBR Program shall assess the impacts of the Program on Black, Indigenous and People c communities, low- and moderate-income residents, renters, people with disabilities and m equity-priority populations in the region using partner agreed-upon methodologies and dat include an assessment of the distribution of program impacts and benefits (as defined by th Mobility Advisory Committee- #18 below), potential outcomes, and mitigations for equity p 2030, 2040 and 2050.
37	Equity	Evaluate equitable outcomes using performance measures developed by the IBRP Equity A benefits and impacts to equity priority communities (including BIPOC).
38	Equity	Prioritize historically marginalized and underserved communities within Program area to es implement and evaluation of success of project.
39	Bridge Replacement	Further analysis is needed to determine design of a bridge that meets the defined Program
40	Bridge Replacement	Confirm the constraints on bridge design related to navigation and airspace.

Attachment B

41	Bridge Replacement	The bridge shall have the highest quality architecture for the project allowable by engineer reasonable cost to produce a signature design.
42	Bridge Replacement	The bridge cannot negatively impact City of Vancouver's ability to convert Washington Stre any other future changes to the local road network and related facilities as defined by the C phase of the IBR Program.
43	Transit	Safety and Security is a primary objective of the transit system and specific improvements, should be deployed to ensure maximum security and safety for transit patrons and the adja
44	Transit	All park and ride location(s) within the City of Vancouver will be determined in partnership and C-TRAN, be designed to integrate with the community character and landscape, and no multimodal access, safety, and circulation.
45	Transit	Ensure that design of the transit guideway allows for access and use by buses and emergen light rail transit.
46	Active Transportation	Active transportation facilities shall be designed to facilitate a comfortable, low stress expe and in all types of weather, prioritize safety of vulnerable users and ensure safe and conver network to new facilities.
47	Active Transportation	Active transportation facilities shall be designed to minimize users' exposure to roadway po matter and hazardous chemical compounds.
48	Interchanges & Roadway Design	More detailed design of interchanges in Vancouver is required to fully evaluate potential co development potential, and enhanced access for all users.
49	Interchanges & Roadway Design	Interchanges and roadways must be designed with a goal to not impact any properties outs
50	Freight	Preserve and enhance freight access in a manner that is safe, efficient, and does not negati design or character.
51	Transportation Demand Management & Tolling	The Program shall further refine scenarios with variable rate tolls on the existing I-5Bridge.
52	Transportation Demand Management & Tolling	Demand management strategies shall be developed with the goals to manage auto deman peak traffic periods, support downtown Vancouver's circulation goals, reduce greenhouse g include the use of variable rate tolling.

Attachment B

53	Transportation Demand Management & Tolling	Freeway access streets should receive additional traffic management as warranted and agr
54	Urban Design	The bridge river crossing shall be an iconic design, connect the historical and interpretive ar elements, and not harm the landscape or existing archeological or cultural resources.
55	Urban Design	Recreational and open space design shall be determined in collaboration with Program par
56	Urban Design	The bridge design shall improve the existing user experience in downtown Vancouver, acco and welfare of the general public. In circumstances where nuisances are reasonably expect impacts will be mitigated to the maximum extent practicable.
57	Urban Design	Community connections shall be designed to connect historical and cultural landscape elen not limited to a lid over I-5 connecting Downtown to the Historic Reserve, extension of Mai redevelopment or re-use of land unencumbered by physical structure for the bridge itself c treatment facilities (5th Street to north bank of the Columbia River).
58	Enhancement, Impact Avoidance, Mitigation	The IBR Program shall provide the highest model of environmentally and socially friendly de bridge of its proposed size and scale. Temporary screening of construction and staging area appealing and help tell the story of the bridge and community.
59	Enhancement, Impact Avoidance, Mitigation	The Program must respect properties outside of WSDOT ROW and have a goal to avoid bot impacts to those properties during and after construction. If impacts are unavoidable, they full extent practicable and as required by prevailing federal, state or local laws and ordinan
60	Enhancement, Impact Avoidance, Mitigation	The Program must identify proposed mitigation for any potential adverse human or natura
61	Enhancement, Impact Avoidance, Mitigation	The City of Vancouver must be included in any Health Impact Assessment (HIA) work includ
62	Construction and Contracting	The Program shall implement a robust workforce training and apprenticeship program that Vancouver and Clark County residents.
63	Construction and Contracting	The Program shall minimize and mitigate disruptions to residents, businesses, roadway use environment resulting from construction and staging activities, including maintaining multi circulation.

Attachment B

		IBR Program - Commitments for Modified Locally Preferred Alternativ
64	Process	The IBR program will develop a workplan to address partner requests and conditions of appr address any conflicts that arise between partner agencies independent conditions of approv timeline for responding to partner agency requests.
65	Community & Stakeholder Engagement	Authentically engage with the program's advisory groups in all major program decisions, tim
66	Community & Stakeholder Engagement	Commit to partner engagement to help shape a communications strategy and execution, en the development of the program design.
67	Community & Stakeholder Engagement	Commit to a robust community engagement program to solicit and obtain public input for a including establishing public priorities for design and evaluation of impacts to the built and n input on design options.
68	Community & Stakeholder Engagement	Develop a Community Benefits Program.
69	Climate	Provide a high level of sustainable design and construction practices including a stormwater impact on fish, wildlife, and watershed health.
70	Climate	Prepare an in-depth Greenhouse Gas (GHG) analysis including climate change, air quality, ca Miles Traveled (VMT).
71	Equity	Prepare an Equity Report that assesses the impact of tolls on low-income people, including t access to technology for payment of tolls; the impact of the project on low-income and mino to affordable housing and employment; and the impact of the project on populations at or b entails an examination of access to jobs and services, physical accessibility, potential negativ construction and/or property acquisition, and other elements in alignment with our equity c
72	Equity	Implement an accountability tracking tool that will include regular staff reports to the progra Group regarding how the Equity Framework (and equity more broadly) has shaped decisions
73	Equity	Prioritize access, influence, and decision-making power for marginalized and underserved co program in establishing objectives, design, implementation and evaluation of success.
74	Bridge Replacement	Employ high quality architectural design for the North Portland Harbor Bridge and Columbia

Attachment B

75	Bridge Replacement	Design a bridge that is aesthetically pleasing, cost efficient, and sustainable.
76	Bridge Replacement	Design and construct the program following principles of sustainability, cost efficiency, cont avoidance and minimization of impacts.
77	Transit	Develop the high-capacity transit terminus, station placement, alignment and design to allo connections.
78	Transit	Develop options and define impacts and costs for the high-capacity transit alignment accou opportunities, safety and efficiency, traffic movement, construction costs and impacts.
79	Transit	Conduct further analysis on the size and design of park and rides accounting for ridership an impacts on the street network and integration with the surrounding land uses; document in Environmental Impact Statement (SFEIS).
80	Transit	Develop stations, furnishings, roadwork and sidewalk elements in character appropriate to V Island.
81	Transit	Refine station locations accounting for safety, compatibility with surrounding uses, cost-effe operations.
82	Transit	Develop a plan for Transit Operations & Maintenance funding sources.
83	Transit	Optimize the HCT option selected to maximize ridership potential and improve the transit n needs today and into the future; and that fits within the operating plans of the two partner and TriMet.
84	Active Transportation	Undertake additional design to include robust active transportation facilities on the bridge, a the program area; meet or exceed standards; meet the active transportation demand consid transportation demand measures.
85	Active Transportation	Provide good active transportation connections to HCT stations including infill of missing sec
86	Active Transportation	Retain and enhance multimodal transportation especially in the vicinity of highway overcros
87	Freight	Confirm the configurations of the Marine Drive/Hayden Island and Mill Plain interchanges al and efficient movement of freight and workforce traffic and complement current and future Port's Marine Terminals and key industrial districts.
88	Freight	Ensure the auxiliary lane design and configuration on the bridge allows for safe and efficient general-purpose traffic. Develop the design of the bridge to consider adequate shoulder wid high, wide and heavy and general industrial freight and containers.

Attachment B

75	Transportation Demand Management & Tolling	Develop a comprehensive TDM program that includes variable-rate tolling.
90	Transportation Demand Management & Tolling	Use TDM to help manage peak period auto demand.
91	Transportation Demand Management & Tolling	Implement tolling on I-5 as soon as legally and practically permissible.
92	Transportation Demand Management & Tolling	Develop a plan to educate the public about tolls.
93	Transportation Demand Management & Tolling	Evaluate and seek authorization for pre-completion tolling of the existing bridge under Title replacement bridge is under construction.
94	Enhancement, Impact Avoidance, Mitigation	(General) Right size and develop a transportation program that is responsive to community responsible, resilient to future climate and social changes, and satisfies the Purpose and Nee
95	Enhancement, Impact Avoidance, Mitigation	(HIA) Work with Multnomah County and other interested agencies to develop a Health Impa the potential impacts and benefits to human health from the program.
96	Enhancement, Impact Avoidance, Mitigation	(NEPA) Prepare a Supplemental Environmental Impact Statement (SEIS) pursuant to the Nat Act (NEPA) that assesses potential impacts to the built and natural environments including a change and greenhouse gas emissions; the SEIS will include mitigation measures to avoid or feasible. The SDEIS will include opportunity for public input and comment during a public re hearing(s).
97	Enhancement, Impact Avoidance, Mitigation	Prepare a sustainability plan.
98	Construction and Contracting	Develop a construction management approach that includes appropriate requirements to re footprint during construction.
99	Construction and Contracting	Set targets to achieve DBE utilization and employ innovative strategies to achieving workfor
100	Financing	Develop a financial plan including capital sources and uses of funds for presentation to the p public that indicates federal, state, and local funding.
101	Financing	Prepare a Level 2 toll traffic and revenue study.
102	Financing	Prepare an investment grade (Level 3) toll traffic and revenue study.

Attachment C:
Summary of feedback on the Draft SEIS from City of Vancouver Advisory Bodies and general public

Summary of Board & Commission Meetings

City of Vancouver staff presented findings from the Draft SEIS to seven City boards and commissions during the public comment period. The following sections highlight key discussion topics from each of those presentations. In addition to the summaries below, some groups, including the Parking Advisory Committee and City Center Redevelopment Authority, have submitted their own comment letters on the Draft SEIS.

City staff will continue to provide updates to these boards and commissions throughout the environmental review and design processes.

Parking Advisory Committee (PAC)

10/9/2024

- **Park and Ride concerns:** Initial modeling for the Modified LPA predicted full utilization of two park and rides in Downtown Vancouver. Given that the existing Downtown parking supply is underutilized, the committee discussed the implications for the IBR program and the need for additional structures.
- **Regulation issues:** Discussion on how to regulate usage of parking lots, especially for people working in Downtown Vancouver. Final design needs to clarify operational considerations.
- **Environmental considerations:** Questions raised about the environmental impact of park and rides, including GHG analysis and their alignment with climate goals.

Parks and Recreation Advisory Commission

10/16/2024

- **Kiggins Bowl impact:** Uncertainty around the timeline and extent of impact from the temporary construction easement.
- **Stormwater management:** Clarifications needed on the distinction between stormwater management and parkland mitigation.
- **Safety and community concerns:** Emphasis on safety for pedestrians and cyclists, tree preservation, and honoring culture through design.

City Center Redevelopment Authority (CCRA)

10/17/2024

- **Park and ride concerns:** Concerns about the appropriateness of new, large parking structures in downtown, including the potential for vandalism and inefficiency. Conflicts

with vision for Downtown as a vibrant, walkable, transit-oriented place to live, work, shop, and visit. Impacts on future redevelopment potential.
- **Questions about:** the destination of park and ride users, other possible locations for park and rides, potential pricing, waterfront access under the bridge, light rail hours of operation, impact on traffic without the C Street ramps, and how the comments on the Draft SEIS will be used.
- **Downtown Parking Plan:** how does the City's draft plan address park and rides? Suggestion to mesh the recommendations from that plan to address IBR needs.

Planning Commission
10/22/2024

- **Equity concerns:** Concerns about potential impacts on low-income populations and vulnerable communities, particularly from displacement, tolling, and noise.
- **Questions about:** the adequacy of mitigation, partial acquisitions, and the viability of carpool programs.
- **Shared Use Path:** Concerns about the grade of the ramp connection. Want rigorous mitigation, given that the design is not final.

Aviation Advisory Committee
10/23/2024

- **Flight path impact:** Discussions on potential obstructions from the new bridge and impacts on flight paths, particularly regarding the height and location of the C Street ramps, SR 14 interchange, and construction equipment.
- **Construction impact:** Recognition of potential disruptions to airport operations during construction of the Modified LPA. Given the anticipated duration of construction, it won't feel "short-term".
- **Questions about:** visualizations from Pearson Field, height of new structures compared to existing downtown buildings, and economic impacts.

Transportation and Mobility Commission
10/29/2024

- **Active transportation access:** Practical and accessible design of active transportation connections to the bridge, particularly at the Waterfront, are needed. Consider an active transportation connection to Evergreen and elevators. Plan for electric powered devices.
- **Equity impacts:** Concerns about the impact of acquisitions and displacement on residents' homes and livelihoods. Provide multilingual communication about transit disruptions and support for small businesses during the construction phase. For tolling, offer the low-income discount program from the start and offer technical assistance to those that qualify.
- **Downtown:** Concerns about having an ugly park and ride structure Downtown and how it would be priced and managed to serve its intended purpose. Questions about the design for the waterfront area under I-5. Desire for more info on construction impacts to the waterfront, given its importance as an economic driver.

- **Questions about:** travel modeling assumptions and outputs, rationale for comparing to a No Build scenario, reasons for analyzing the "without C Street Ramps" and "westward shift of I-5" design options, cost-benefit and safety implications of the braided ramps and overpass reconstructions, relationship to planned improvements to Fourth Plain, construction packaging for contractors, budget for public art, and status of IBR funding.

Culture, Arts and Heritage Commission
11/07/2024

- **Construction effects on historic buildings:** Concerns about the proximity of construction to downtown Vancouver's unreinforced masonry buildings, which are vulnerable to vibrations and structural impacts. Recognize the deteriorated state of some historic buildings, provide thorough evaluations, and prevent unintended damage.
- **Specific sites of concern:** Providence Academy, Covington House, Officer's Row and Pearson Field and the West Reserve.
- **Preservation:** Focus on saving key remnants of the past.
- **Cultural representation:** Don't miss telling the important stories of underrepresented communities.

Summary of Public Meetings & Events

City of Vancouver staff attended various meetings and community events during the comment period to hear what questions and concerns the Vancouver community had about the IBR program and Draft SEIS. This included the following public events hosted by IBR, presentations to and discussions with community groups, and local events:

Date	Meeting/Event
October 1, 2024	Shumway Neighborhood Association Meeting
October 5, 2024	Old Apple Tree Festival
October 8, 2024	Lincoln Neighborhood Association Meeting
October 15, 2024	Downtown Stakeholders
October 15, 2024	Vancouver Open House
October 21, 2024	Esther Short NA Meeting
October 22, 2024	WA APEX Contractor forum
October 22, 2024	Rose Village Neighborhood Association Meeting
October 24, 2024	Vancouver Heights Neighborhood Association Meeting
October 26, 2024	IBR Public Hearing – Virtual #1
October 30, 2024	IBR Public Hearing – Virtual #2
November 4, 2024	Tour of Smith Tower
November 5, 2024	Shumway Neighborhood Association
November 13, 2024	Vancouver Neighborhood Alliance
November 14, 2024	Arnada Neighborhood Association Meeting
November 15, 2024	East Vancouver Business Association Meeting

The following section summarize the key themes from these meetings and events.

Attachment C

Active transportation access: Concerns about how people will access the shared use path on the bridge, considering the height of the new bridge. One access point at the Waterfront doesn't seem like enough and an additional access point to the shared use path at Evergreen is desired.

Climate and environmental: Concerns about negative impacts to the water, wildlife, trees and people who will have to deal with pollution/dust from construction. Desire for mitigation to include long-term air quality monitoring, as well as the early replacement and long-term maintenance of any trees removed. Requests for more measures to incentivize electric vehicle use and reduce vehicle miles traveled (VMT).

Construction: Common questions were related to construction phasing/timing, impacts and closures to the existing I-5 bridge, traffic impacts in neighborhoods during overpass reconstruction, and what will happen to the old bridge. Concerns about how construction is going to impact ADA accessibility, traffic, older buildings and the environment (particularly related to dust and noise). Downtown residents particularly concerned about impacts to congestion, pedestrian access, bus reliability, and emergency service access during construction.

Design: Common questions were related to the height of the bridge, number of travel lanes, frequency of bridge lifts, and the I-5/SR 500 interchange. Concerns about how high the bridge will be, that Coast Guard support/permit has not been secured and that some design details haven't been shared with the public yet, such as the Fourth Plain overpass. Support expressed for the Community Connector providing a better connection across I-5. People want clarity on how they will navigate to daily services, such as the grocery store or doctor. Communication with community throughout the design process will be critical.

Funding: Questions about how much funding has been secured and how much more is still needed. Concerns about how a new administration at the federal level might impact funding for the bridge.

Park and ride: Concerns about the excess of parking already in Downtown Vancouver and the potential for park and rides to exacerbate existing traffic problems. Downtown Vancouver is a destination, and a new garage in downtown may suggest Vancouver is merely a stop en route to Portland. Suggestions include: using existing parking rather than constructing new facilities, improving wayfinding and transit solutions, coordinating with private parking structures, and providing a valet/shuttle system. Additional concerns about accessible parking access.

Property impacts: Concerns about property acquisition and impacts to residents, businesses, public spaces, Providence Academy, the Vancouver National Historic Reserve, and other historic properties.

Transportation: Concerns about how the project will impact traffic, particularly in the downtown core of Vancouver where streets and on-ramps are already congested. Concerns about the potential negative impacts of light rail. Questions about the benefit of only two stations in Vancouver. Concerns that terminating light rail in downtown could create more congestion, with some desiring to have light rail extended farther north.

Tolling: Clarity needed about when tolling will be in place, what the pricing structure will be and what the money will be used for. Concerns that tolling will have a greater impact on low/fixed-income residents who cross the bridge multiple times a day. Suggestion that residents who are going to be directly impacted by construction for several years should have a lower tolling rate or be exempt from tolling.

Attachment C

CITY OF Vancouver WASHINGTON

MEMORANDUM

TO: **Interstate Bridge Replacement (IBR) Program Team**

FROM: **Ryan Morin, Chair**
Parking Advisory Committee (PAC)

DATE: **November 14, 2024**

SUBJECT: **Parking Advisory Committee comments on park and ride and IBR Draft Supplemental Environmental Impact Statement (SEIS) Report**

The City of Vancouver ("COV") Parking Advisory Committee ("PAC") was formed in 1999 to advise City Council on parking policy and implementation within downtown parking enforcement area. Additional PAC advisory duties include property acquisition or construction for parking facilities, parking analysis and studies, recommendations to adopt and amend ordinances related to on- and off-street parking.

Under the direction of the PAC, the COV Parking Services Division partnered with Walker Consultants to draft a new Access, Mobility, and Parking Plan ("Plan") for downtown Vancouver. The PAC is tasked with reviewing existing conditions, helping to develop action items, and provide guidance to the City's implementation of the Plan. Over the last 10 months, the PAC has reviewed extensive data, including downtown trip behaviors and occupancy and utilization data for on- and off-street parking spaces. The downtown core is expected to continue its dramatic growth, and this plan seeks to balance parking efficiency, access, curb management, and mobility alternatives to accommodate expected future growth.

During the PAC meeting in August 2024, IBR representatives provided an overview of the proposed IBR investments, and at the October 2024 meeting, COV staff, in collaboration with the IBR team, briefed the PAC on the key findings in the Draft SEIS related to the park and ride options under consideration. This memo summarizes the feedback provided by committee members during those meetings.

- New park and ride structures are in opposition to COV goals and policy to reduce the reliance on single occupancy vehicles downtown. A dispersed parking plan would better align with City goals. Investing in new parking facilities downtown will only induce more vehicle trips.
- COV Parking Services, along with partners, recently completed an existing conditions report. The report concluded that downtown Vancouver has roughly 14,000 parking spaces, the majority of which are chronically underutilized.
- The Library Square site (Evergreen #1) would be better utilized for other purposes. Building a parking structure would be a lost opportunity compared to a new transit-oriented development (TOD) focused on housing and commercial/retail amenities. The adjacent uses

are active and lively, park n ride facilities contribute to congestion that will negatively impact pedestrians.

- If new park and ride structures are required by federal partners, site W2 would be least harmful to long-term downtown development goals. Proposed site W2 is close to the Waterfront and may help to address parking demand in addition to serving transit users.
- In the opinion of PAC members, urban and dense areas are not ideal for park and ride locations. Leveraging existing suburban park and ride lots, with express buses bringing commuters to downtown, would be more ideal.

The Parking Advisory Committee strongly supports the City of Vancouver adopted goals, cited above, and therefore encourages the IBR project to utilize existing parking resources rather than building new park and ride facilities.

Attachment C

MEMORANDUM

TO: Interstate Bridge Replacement (IBR) Program Team

FROM: Patrick Quinton, Executive Director
City Center Redevelopment Authority

DATE: November 14, 2024

SUBJECT: CCRA Board Feedback on IBR Draft Supplemental Environmental Impact Statement (SEIS) Report

The Board of the City Center Redevelopment Authority ("CCRA"), a state-chartered public authority responsible for redevelopment within downtown Vancouver, has reviewed relevant sections of the Draft SEIS and received a briefing on the report from City of Vancouver ("City") staff on October 17, 2024. This memo summarizes the feedback provided by the Board during that meeting and in individual conversations with Board members since the meeting.

CCRA was formed in 2006 to lead the redevelopment of downtown Vancouver and is a separately chartered public agency under Washington State Law. CCRA's charter and bylaws state that the Board shall "…undertake, assist with and otherwise facilitate the redevelopment of property within the Vancouver City Center Vision ("VCCV") plan area." The CCRA charter grants the organization broad powers to achieve the redevelopment goals for downtown including the authority to acquire and sell property and initiate public private partnerships to undertake redevelopment projects.

Since the formation of CCRA in 2006, **downtown Vancouver has been transformed and attracted billions in new private investment.** CCRA has played an active role in this transformation through both advocacy and by serving as the lead public partner in strategic redevelopment sites such as Waterfront Gateway. CCRA will play an expanded role in downtown redevelopment in the future, particularly with high opportunity sites such as Library Square.

Toward that end, CCRA has begun planning for the next wave of downtown development by commissioning a Downtown Redevelopment Study ("Study") that will identify the high opportunity areas for future development that will catalyze the necessary investment to continue downtown Vancouver's transformation into a dense, walkable and accessible urban center. That study is explicitly incorporating in its analysis the current plans for a new bridge to help CCRA understand the redevelopment potential of the areas impacted by the IBR project, and its early findings inform our feedback in this memo.

CCRA feedback on the Draft SEIS focuses on three specific areas as described below: **Park and Ride, Urban Design and Traffic Impacts**.

Park and Ride

While the CCRA Board understands that Park and Ride facilities are often located near transit termini, the Board has always believed that **the location of Park and Ride facilities downtown runs counter to both best practices in real estate development and thoughtful transportation planning**. Park and Ride facilities in urban centers occupy valuable real estate that could provide more public benefit through housing and office development. In addition, the City's parking and transportation planning prioritizes improving mode split to and within downtown so the presence of additional public parking facilities that could induce more car trips will only make this work more challenging.

The City is nearing completion a new Downtown Parking Plan that includes an inventory of existing parking and will establish a plan for managing future growth downtown without increasing the public parking supply. The findings from that plan indicate that downtown has 14,000 parking spaces, most of which are significantly underutilized. A key conclusion from those findings is that the elements exist to implement a shared parking system throughout downtown that can meet the needs of existing and future users, including those who park downtown to access light rail. Because implementation of the new plan calls for the City to organize shared parking agreements with downtown property owners to unlock more the existing parking supply for public use, the CCRA Board is confident that a dispersed parking alternative will be available to meet the needs of anticipated park and ride users and therefore **requests that downtown Vancouver be spared from the addition of any new park and ride facilities**.

In the event the above request is not honored, the CCRA Board strongly advocates that the location and requirements for new Park and Ride facilities in downtown meet the criteria below:

- Avoid utilizing or constraining high opportunity redevelopment sites, including Waterfront Gateway and Library Square. These sites have already been identified in the Study as two of the last remaining opportunities for large mixed-use development with the potential for catalyzing further private development.
- Require that any new park and ride garage operate as a shared use facility that serves as many different types of parking users as possible. A shared use facility could minimize the impact on downtown by eliminating the need for new parking associated with development or to support retail.
- Employ pricing strategies that complement the City's demand driven pricing designed to discourage long term parking, increase turnover and encourage use of alternate forms of transportation.
- Utilize thoughtful urban design to maintain the human scale and pedestrian friendly feel of downtown Vancouver. Poorly designed parking structures near transit stations can hinder access for walking, biking and other alternative forms of mobility.

Urban Design

The construction of a new bridge will dramatically alter the environment near the I-5 roadway in downtown Vancouver. The new bridge and adjacent roadway will also create new spaces with the potential to add or detract from the human experience downtown. The CCRA Board is not alone in asking for the IBR to take great care in the design of new underpasses and other public spaces near highway infrastructure to create safe and inviting environments for people on foot, bike or other non-motorized transportation.

Spaces under freeways have historically been neglected wastelands viewed by the public as unsafe and detracting from the urban fabric. To counter this, communities across the US have employed innovative solutions to design and activate these historically uninviting spaces. The Board urges the IBR team to seek out best practices in designing, managing and activating these practices and include these recommendations in the final project design.

In addition to thoughtful design, governance of these spaces will also determine how they are activated and utilized. The CCRA Board advocates for local control of these new spaces and ongoing funding to allow for active management that is coordinated with other downtown uses and activities.

Traffic Impact

The CCRA Board remains concerned that the **IBR project will impact traffic patterns in a manner that negatively impacts downtown Vancouver**. In particular, we are concerned that the loss of one or both of the C Street Ramps will divert additional car traffic through downtown seeking access to I-5. While the Board appreciates the challenges associated with accommodating existing I-5 access in the new design, they do not believe that an appropriate tradeoff is to flood downtown Vancouver with additional traffic with no intention of stopping within downtown. Maintaining the existing access to downtown from I-5 is the best option for supporting for the future vision for downtown Vancouver.

The CCRA Board appreciates the opportunity to provide this feedback and strongly supports the IBR project and the transformative impact the project will have on Vancouver and SW Washington. The project is vital to the resilience of our transportation system, the economic future of our region, and Vancouver's emergence as a driver of growth for the State of Washington. The Board hopes that extreme care is taken in the planning and implementation of this project to protect the integrity of downtown Vancouver from the meaningless traffic, lifeless structures and unwelcoming spaces that have resulted from similar projects. The Board is committed to remaining engaged with the IBR team to help ensure that this project delivers the promised benefits for Vancouver and the region.

Attachment D: Administrative Comments by Chapter/Report (spreadsheet)

Item	Department / Division	Chapter/report	Section #	Page #	Figure/ Table #	Comment
1	FIRE	2. Description of Alternatives	2.2.3 Columbia River Bridges (Subarea B), Double-Deck Fixed-Span Configuration	26	Figure 2-16	NFPA 502: Standard for Road Tunnels, Br construction on a lower deck creates limite standards. •Open-truss construction on a lower deck referenced standards. •During construction, repair, alteration or d •Bridges and elevated highways over 1000 •Closed-circuit television systems are requ •On limited access highways drainage sys flammable liquids, and shall be designed t •Standpipes for fire protection shall be inst exceeds 1000 feet. •Hose connection design shall comply with •Where emergency communications are ir •Enclosed highway reflective or lighted dir at a distance of no more than 82 feet. •Products of combustion such as heat, sm control provisions shall be in accordance w •Electrical systems shall support life safety •Where required exit signs shall be externa •For enclosed road tunnels, emergency ar 502. Emergency lighting shall be connecte •Wiring in manholes shall be protected fro and locking capabilities. •A hazard analysis will be required for vari involving large vehicle fire loads and lithiur The following incidents shall be considered (1) Fire or a smoke condition in one or mor (2) Fire or a smoke condition adjoining or a (3) Collision involving one or more vehicles (4) Loss of electric power that results in los (5) Rescue and evacuation of motorists un
2	PW - Transportation	3.1 Transportation	3.1.3 Long-Term Effects, Safety in 2045, Modified LPA	43		Section 3.1-page 43 paragraph 5. The doc predicted to reduce the total crashes by 13 Interstate Bridge Openings and Gate Closu directions are approximately 2 times more going to further reduce the crash frequency capacity constraints. Confirm that the impr
3	CDD	3.1 Transportation	3.1.3 Long-term effects, Bottle Necks & Speeds 2045, Modified LPA without C Street Ramps	27		I thought that there was also some conges congestion. Would there be NB congestion
4	CDD	3.1 Transportation	3.1.3 Long-term effects, Transit in 2045, Transit Travel Time	35		Wouldn't the movable bridge span option r during the AM and PM peak hours?
5	CDD	3.1 Transportation	3.1.3 Long-term effects, TDM and TSM in 2045	44		"New and improved bicycle and pedestrian time." Not only would there physically be m of users/skill sets compared to the no build
6	PW - Transportation	3.1 Transportation	3.1.6 Potential Avoidance, Minimization, and Mitigation Measures, Modified LPA Without C Street Ramps	52		Section 3.1 Page 52. "Modified LPA withou of the six failing intersections not provided. were implemented the concurrency corrido
7	PW - Transportation	3.1 Transportation	3.1.3 Long-Term Effects, I-5/I-205 Travel Forecasts in 2045	21	Table 3.1-11	Section 3.1-page 21 Table 3.1.11 states th further down (page 22, last paragraph), it s compared to no build. The two statements would be 3% lower as compared to the No
8	PW - Stormwater	3.16 Ecosystems	3.16.4 Temporary Effects, Modified LPA, Aquatic Resources, In-Water Work Timing	29		In-Water Work Timing, second bullet. Is thi two days.
9	PW - Surface Water	3.17 Geology & Groundwater	3.17.2 Existing Conditions, Groundwater Resources	4		Text references only Special Protection Ar overlapping designated Wellhead Protectio
10	CMO	3.19 Climate Change	3.19.1 Changes or New Information Since 2013	3	Table 3.19-1	This project needs to add another metric fo modified by this project). The current meas a consistent geography - if VMT change is VMT relative to the existing facility).
11	CMO	3.19 Climate Change	3.19.1 Changes or New Information Since 2013	3		Note if induced demand and vehicle electri confusing to the reader.
12	CMO	3.19 Climate Change	3.19-1			This section should include mention of the
13	CMO	3.19 Climate Change	3.19-1		Table 3.19-1	The difference between the construction e depth explanation than referencing a "char
14	EPH	3.3 Property Acquisitions and Displacement	3.3.3 Long-Term Benefits and Effects, Modified LPA	10		"(Site 1) would make use of an existing pa adjacent to the Vancouver Community Libr surface parking.

Attachment D

Item	Department / Division	Chapter/report	Section #	Page #	Figure/ Table #	Comment
15	CDD	3.4 Land Use and Economic Activity	3.4.3 Long-Term Benefits and Effects, Modified LPA, Business Displacements, Property Tax Impacts	31		Potential typo- "Waterfront Site 3 is owned impact." This should say Site 2 right?
16	CDD	3.4 Land Use and Economic Activity	3.4.3 Long-Term Benefits and Effects, No Build Alternative, Land Use	17	Table 3.4-6	Typo - should say "Site 2: Additional 0.1 ac
17	CDD	3.6 Public Service & Utilities	3.6.2 Existing Conditions, Public Services	4	Figure 3.6-2	Think Hudson Bay High School should be
18	PW	3.6 Public Service & Utilities	3.6.2 Existing Conditions, Utilities	6	Table 3.6-4	Does Lumen have infrastructure in the stu another group.
19	CDD	Acquisitions Report	4.3.4			Clarify where exactly the additional 0.2 acr
20	CDD	Acquisitions Technical Report	4.3.4.2 Design Options, Park and Rides	4-8 (93 of 138)		Statements about Hayden Island inapprop difficult to relocate based on location and/c patronage and may be difficult to reestablis waterfront location. Floating homes may al
21	CDD	Acquisitions Technical Report	4.3.4.2 Design Options, Park and Rides		Tables 4-5 and 4-6	The identifiers in Tables 4-5 and 4-6 do no 2b. Final SEIS should use consistent desc
22	CDD	Acquisitions Technical Report	Appendix			The IBR ID #38470012 is listed many time
23	CMO - Climate	Air Quality	3.10.3 Long-Term Effects	3.10-10	Table 3.10-4 and 3.10-5	In the tables, note what the federally/state green/yellow/red to provide reader witth sc Data without context is not helpful for the r
24	CMO - Climate	Air Quality	3.10.3 Long-Term Effects	3.10-12		Include additional context about impacts ar doesn't not explain if there are any benefits impacts should also be included in this cha
25	CMO - Climate	Air Quality	3.10.6 Potential Avoidance, Minimization, and Mitigation Measures	3.10-14		Should proposed mitigation measures be i
26	CMO - Climate	Air Quality				The SEIS assumes significant decreases i those federal regulations will be maintaine
27	CMO - Climate	Air Quality	3.10.4 Temporary Effects	3.10-13		The Exec Summary says that potential off- clear in the context of air quality.
28	EPH	ALL				Revise to read that up to 2 park and rides
29	CDD	All reports / chapters (especially EJ)	general			Be clear when the analysis is referring to th
30	**CDD**	**Climate Change technical report**	**7 and 8**			**Explain how decisions will be made abo**
31	CDD	Cumulative Effects report	3.12.2 Effects from Past, Present, and Reasonably Foreseeable Future Actions	3-33 (118 of 168)		The discussion on cumulative effects to Va
32	CDD	Environmental Justice Technical Report	2.3.1 EJ Secondary Study Area	2-8 (81 of 202)	Figure 2-1	Since this chapter is focused on EJ commu which sections of the secondary study area
33	CDD	Environmental Justice Technical Report	2.5.2.1 Initial Community Engagement (2020-2021)	2-13 (86 of 202)		Says "Four community-specific listening se Should this say November 2021?
34	CDD	Environmental Justice Technical Report	3.2.1 Minority Populations	3-9 (107 of 202)		Instead of saying "Comparing block groups population" it would be more accurate to sa Vancouver." Since the table is not compari
35	CDD	Environmental Justice Technical Report	3.2.2.1 Meaningfully Greater and High-Priority Low-Income Areas	3-17 (116 of 202)		"Additional analysis was done to assess b Vancouver region as a whole." This should
36	CDD	Environmental Justice Technical Report	3.2.2.1 Meaningfully Greater and High-Priority Low-Income Areas	3-17 (116 of 202)		"The following sections describe low-incom to low-income populations within the study
37	CDD	Environmental Justice Technical Report	3.2.2.2 Low-Income Housing	3-19 (118 of 202)		"A number of subsidized housing units, pu Figure 3-7, there are no low-income housi within the Vancouver portions of the study populations in this report therefore conside more within the EJ Secondary Study Area. north side of Fourth Plain west of I-5) appe one of the two EJ thresholds.
38	CDD	Environmental Justice Technical Report	3.2.2.2 Low-Income Housing	3-19 (118 of 202)		Double check the locations of the housing Fourth Plain.
39	CDD	Environmental Justice Technical Report	2.2.1 Minority Populations	2-5 (78 of 202)		Bullet with American Indian and Alaska Na
40	CDD	Environmental Justice Technical Report	2.2.1 Minority Populations	2-5 (78 of 202)		Should be 'Black or African American', not
41	CDD	Environmental Justice Technical Report	2.4.3 Community Resource Mapping	2-9 (83 of 202)		Add 'community based organizations and s
42	CDD	Environmental Justice Technical Report	2.6.1 Long-Term Impact Assessment Methods	2-21 (94 of 202)		The description of this section is 'long-term property acquisitions (short-term) and not l Effects section discusses indirect displace
43	CDD	Environmental Justice Technical Report	2.5.2.1 Initial Community Engagement (2020-2021)	2-13 (86 of 202)	Table 2-2	Why are Youth and Low-Income Populatio
44	CDD	Environmental Justice Technical Report	3.2.3 Neighborhood Characteristics	3-27 (126 of 202)	Table 3-19	Technically this table also includes a coupl Gresham and Portland neighborhoods are Given that Rockwood is an EJ priority area the analysis includes their neighborhood.

Item	Department / Division	Chapter/report	Section #	Page #	Figure/ Table #	Comment
45	CDD	Environmental Justice Technical Report			Table 3-20	Listing Regal Cinema as a community reso mainline, the shifting the I-5 mainline west would be displaced, and **the Regal City C** living in these units. However, these displa Apartments are located at the edge of the **considered community resources**, make
46	CDD	Environmental Justice Technical Report			Table 4-3	Column 3 (Impact Specific to Minority and Westward shift design option twice. Replac third EJ area in Vancouver.
47	CDD	Environmental Justice Technical Report			Table 4-3	Acknowledge potential impact to Esther Sh Economics section. This land use would ha intent for Downtown to be a pedestrian-orie
48	CDD	Environmental Justice Technical Report			Table 4-3	The Transportation row in the table says "(neighborhood, a high-priority EJ area" and transit station..." Section 4.4.2 (Transit Imp high-priority EJ area." Correct these sente
49	CDD	Environmental Justice Technical Report	4.4.3		Table 4-3	Other benefits to EJ populations that could to the pathway to Old Apple Tree Park and and other resources for Esther Short, Arna transportation trips - modes that lower-inco EJ populations living along the Vine routes such as Fourth Plain Village. Given how im ridership among EJ pops, this is an importa
50	CDD	Environmental Justice Technical Report			Table 4-3	How would the No C Street Ramps design on local streets? It seems there could be a
51	CDD	Environmental Justice Technical Report	4.2, 4.3, 4.4		Table 4-3	Table 4-3 summarizes the impacts from th 4.3 Displacements and Community Resou Traffic Impacts does not discuss the No C
52	CDD	Environmental Justice Technical Report			Tables 3-19 and 3-20	To be consistent with the "No Thresholds" within and outside of EJ focus areas acces
53	CDD	Environmental Justice Technical Report	4.3	4-21		Acknowledge minor, temporary impacts to
54	CDD	Environmental Justice Technical Report	4.2			The finding for the No Build Alternative is i
55	CDD	Environmental Justice Technical Report	4.2			"The Yellow Line extension would operate implies that the transit guideway will have s
56	CDD	Environmental Justice Technical Report	4.4.3			Acknowledge benefits to Arnada from activ overcrossings of I-5 at 29th Street and 33r
57	CDD	Environmental Justice Technical Report		4-38		"Esther Short has a high-priority percentag Portland-Vancouver region (Table 3-20)." I analysis does not apply the thresholds to i
58	CDD	Environmental Justice Technical Report	6.2 Indirect Effects	6-2		"Other indirect effects could include increa Village, which have been identified as high and findings summarized in earlier section high-priority EJ areas within the study area for low-income, and Rose Village is a "mea should be added to this list.
59	CDD	Environmental Justice Technical Report	7.1.1.2 Mitigation for Long-term Noise Impacts	7-2		"Noise impacts in the Rose Village neighbo Street and SR 500. Noise Wall 4 would rep overcrossing and would continue along the correcting the noise impacts to Rose Villag east side of I-5 (in Rose Village), wall 8 wo impacts mentioned in 4.6 - including Noise
60	CDD	Equity Technical Report	6. Indirect Effects	6-2 (95 of 115)	Figure 6-1	This should reference the City's Equity Ind displacement risk that takes into account h
61	CDD	Equity Technical Report		5-3	Table 5-1	The bullet for "33 multifamily units displace
62	CDD	Equity Technical Report	5.1.1 Houseless Populations	5-5 (92 of 115)	Table 5-2	Title says 'Multnomah County Houseless P
63	CDD	Equity Technical Report	4.2	4-7		"A Community Connector (wide pedestrian it's more than that. Update this to reflect th
64	CDD	Equity Technical Report	4.1.1			Why was 45 minutes chosen for the HCT T peak period? I imagine that many people a viable alternative.
65	CDD	Equity Technical Report	7.1.2 and 8			Add "align new infrastructure with commun community benefits provided in the "Synop

Item	Department / Division	Chapter/report	Section #	Page #	Figure/ Table #	Comment
66	CDD	Equity Technical Report	4.3.3 Other Highway and Driving Equity Considerations			"Numerous studies have found that BIPOC injuries and fatalities... While the extent of relevant. As the IBR Program moves forwa Wouldn't this lead to the finding that there
67	**CDD**	**Equity Technical Report**	**4.1 High Capacity Transit**			**Describe further how/why access to job**
68	**CDD**	**Equity Technical Report**	**8. Synopsis**			**Add further detail about Clark College a today). Also discuss current IBR/C-TRA rail options.**
69	CDD	Executive Summary				Update Table 2 in the Executive Summary the fixed span options. Column 7 says "Sa which does not align with the discussion in
70	CDD	Land Use report	4.3.15			4.3.15 Park-and-Ride Integration with the U Plan - not a standalone section.
71	CDD - Dev Review	Land Use Technical Report	3.5.4 City of Vancouver Overlay Districts	3-61 (140 of 193)	Figure 3-19	Correct the Historic Preservation Overlay a
72	CDD - Dev Review	Land Use Technical Report	3.3.2 Recent and Pending Development	3-10 (89 of 193)		Add 2009 approval of the Vancouver Wate
73	CDD - Dev Review	Land Use Technical Report	3.3.2 Recent and Pending Development	3-10 (89 of 193)		The City is holding a pre-application for 10
74	CDD - Dev Review	Land Use Technical Report	3.3.2 Recent and Pending Development	3-10 (89 of 193)		Address should be 210 W 3rd Street (not 2
75	CDD - Dev Review	Land Use Technical Report	3.3.2 Recent and Pending Development	3-11 (90 of 193)		The Hyatt Place project should be removed 10 of the report.
76	CDD - Dev Review	Land Use Technical Report	3.3.2 Recent and Pending Development	3-11 (90 of 193)		Add to list of projects: Kirkland Renaissanc 115,000 square feet of commercial space t
77	CDD	Land Use Technical Report	4.2.2.1 Park and Rides	4-15 (159 of 193)		Incorrectly states "Two multistory park-and and one in the vicinity of the Evergreen Sta should not say "built" because one of the c correct project description for park and ride
78	CDD	Land Use Technical Report	9. Permits, Plans and Approvals	9-1 (186 of 193)		Includes discussion on the Clark Park and
79	CDD	Land Use Technical Report	7.2.3 Park and Rides	7-2 (184 of 193)		Mitigation measures aren't really mitigation Square or Waterfront Gateway would work any new structure.
80	CDD	Navigation Report	1.4 Purpose of this Report	1-3		The second paragraph in this section is co Environmental Impact Statement (EIS) to r determination is expected to occur prior the Final SEIS? Update this section to be clea
81	CMO	Neighborhoods	2.5.4	2-8		Elaborate on how information from the Cor
82	CMO	Neighborhoods and Populations Technical Report	4.4.10.1 Displacements and Property Impacts	4-14 (146 of 162)		Line 33 states "No residencies would be di residental units would be displaced". Clarif
83	CMO	Neighborhoods and Populations Technical Report	5.3 Washington Temporary Effects	5-3 (153 of 162)		In the Neighborhoods and Equity Existing C easements would not adversely affect neig neighborhood seems to have significant qu for the duration of construction. Reconcile
84	CMO	Neighborhoods and Populations Technical Report	2.6 Analysis Methods Approach	2-13 (83 of 162)	Table 2-2	How has information from the Community data sources in Table 2.2, page 2-13 (with which is vague)
85	CMO	Neighborhoods and Populations Technical Report	3.4 Description of Relevant Neighborhood Plan Goals for Portland and Vancouver	3-45 (132 of 162)	Table 3-47	How has the age of Neighborhood Action I updating theirs this year.
86	CDD	Noise and Vibration Technical Report			Table 7-3	Table 7-3 shows 12 single-family units at r describes the receptor as Normandy Apart be impacted, then clarify why. Otherwise, u any of the findings?
87	CDD	Noise and Vibration Technical Report	7.7.1.4			Summary list of recommended noise walls Mitigation Summary. It should be labeled a
88	**CDD**	**Noise and Vibration Technical Report**	**7. Potential Mitigation**			**Please coordinate with City staff about determined that noise walls are not reas**
89	CDD	Parks and Recreation Technical Report	3.6.4 National Park Service	3-16 (91of 148)		Just to note (not necessarily to change): "T City is not actively pursuing this overpass - with the Reserve.
90	PW - Transportation	Transportation Technical Report	1.1.4 Downtown Vancouver (Subarea C)	1-41 (61 of 1,121)	Fig 1-23	Figure shows one of the proposed park an Convention Center expansion.
91	PW - Transportation	Transportation Technical Report	3.6.1 Roadway Network	3-51 (129 of 1,121)	Table 3-13	SE Columbia Shores Blvd has sidewalks o
92	PW - Transportation	Transportation Technical Report	3.7.1.1 Regional and Local Transit Service	3-80 (158 of 1,121)	Table 3-25	The Vine entry appears to only acknowled
93	CDD	Transportation Technical Report	3.8.2 Active Transportation Facilities in the City of Vancouver	3-95 (173 of 1,121)	Table 3-30	29th Street is an overcrossing, not an unde

Attachment D

Item	Department / Division	Chapter/report	Section #	Page #	Figure/ Table #	Comment
94	PW - Transportation	Transportation Technical Report	4.8.1.2 Active Transportation Facilities in the City of Vancouver	4-127 (351 of 1,121)	Table 4-45	I'm not aware of a RTC RTP project to con project completed in 2022. Clarify which pr Metro/RTC Financially Constrained RTP 2
95	CDD	Transportation Technical Report	4.8.1.2 Active Transportation Facilities in the City of Vancouver	4-128 (352 of 1,121)	Table 4-46	29th Street is an overcrossing, not an unde
96	CDD	Transportation Technical Report	4.8.2.3 Active Transportation Facilities in the City of Vancouver	4-138 (362 of 1,121)	Table 4-51	33rd Street has narrow curb-tight sidewalk landscaping.
97	CDD	Transportation Technical Report	4.8.2.3 Active Transportation Facilities in the City of Vancouver	4-142 (366 of 1,121)	Table 4-52	For E 29th Street, we may end up recomm
98	PW - Transportation	Transportation Technical Report	3.1 Introduction	3-1 (79 of 1,121)		Last two sentences on Page 3-1 and first f
99	PW - Transportation	Transportation Technical Report	3.10.2.2 Facility Management System, Transit Priority at Traffic Signals	3-145 (223 of 1,121)		OR 99 corridor should be Main Street/Hwy
100	PW - Utilities	Utilities Technical Report	3.3 Existing Utilities - Washington	3-7 (79 of 102)	Figures 3-2 & 3-3	The 3 mains you've called out and shown a ranging from 6" to 12". Not sure what your
101	PW - Utilities	Utilities Technical Report	3.3.1 Water and Sanitary Sewer	3-5 (77 of 102)		Water can be fed from the east. Revise las
102	PW - Utilities	Utilities Technical Report	3.3.1 Water and Sanitary Sewer	3-5 (77 of 102)		There is a sewer lift station located in ROV should be mentioned on page 3-5 as well.
103	PW - Utilities	Utilities Technical Report	3.3.1 Water and Sanitary Sewer	3-5 (77 of 102)		The water line in Columbia Way is mention should be mentioned as well
104	FIRE	Utilities Technical Report				Notify emergency service providers of any transport across the Columbia River. - Portland 911 Bureau of Emergency Com - Clark Regional Emergency Service Ager
105	CDD	Visual Quality technical report			All the Degree of Impact tables	The scores need more explanation. For ex 18 is closer to the bridge and the visual ch with the scores. This goes for the entire an
106	CDD	Visual Quality technical report			Visual Compatability tables	In Table 4-8, Project Materials for the Dow anticipated to be consistent with **design re** across the entire Modified LPA for element Similar statement for Columbia River LU b mentioned in some but not all of the LUs?
107	CDD	Visual Quality technical report	3.2.4.1			This section is missing a conclusion about
108	CDD	Visual Quality technical report	4.2.2.1			"Material, color selection, and textures wou with design recommendations, local design Urban Design Committee" in this report. W
109	CDD	Visual Quality technical report	4.2.3	4-29		"This location is currently a gateway into th The Academy), past the City Center 12 cin
110	CDD	Visual Quality technical report	4.2.3	4-30		"A lid over I-5 (the Community Connector) Community Connector would be completed Project Description (Chapter 1)." Why does TBD. The RCP grant assumes that IBR wo the top of lid. It's unneccasry to say report as that applies to everything.
111	CDD	Visual Quality technical report		4-29		"and a tie-in to the planned City of Vancou Boulevard and Fort Vancouver Way Safety
112	CDD	Visual Quality technical report	4.2.4.3	4-51		"New cultural elements, such as unified de this finding for the Greater Central Park LU acknowledges: "The visual character of the of the existing Interstate Bridge and lift tow
113	CDD	Visual technical report	4.2.2.4			Change the degree of impact for KVP 19 to change from existing conditions. The conc the waterfront would be highly visible to tra
114	PW - Surface Water	Water Quality and Hydrology Technical Report	2.2.3.2 City of Vancouver	2-9 (80 of 150)		City of Vancouver Surface Water requires
115	PW - Surface Water	Water Quality and Hydrology Technical Report	3.2.5 Storm Drainage	3-7 (93 of 150)		The report indicates an additional wetpond additional wetpond, and it appears there is
116	PW - Surface Water	Wetlands and Other Waters	3.15.2 Existing Conditions, Wetlands in Washington	6		First paragraph states that Wetland B and due to the scale of the map image. Good t corresponding technical document.

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Item	Department / Division	Chapter/report	Section #	Page #	Figure/ Table #	Comment
1	EPH	3.1 Transportation	3.1.3 Long-Term Effects, Active Transportation in 2045, Modified LPA	42	N/A	We should support an active transit
2	PW - Transportation	3.1 Transportation	3.1.3 Long-Term Effects, Arterials and Local Streets in 2045, Intersection Operations	34	N/A	The documents states “The park an LPA under any design options”. Pag and 700 spaces for the evergreen s churches and other unaffiliated part 69 technical report) that half of the a attract more then 650 trips during th downtown roadway network.
3	PW - Transportation	3.1 Transportation	3.1.4 Temporary Effects, Arterials and Local Streets	47	N/A	Section 3.1-page 47 paragraph 2. T Heavy truck traffic over local roadwa
4	PW - Transportation	3.1 Transportation	3.1.6 Potential Avoidance, Minimization, and Mitigation Measures, Long-term effects, Program-Specific Mitigation	51	N/A	Section 3.1 page 51 paragraph 2. T and last approximately 4 hours”. Th on the C-D system can in-turn cause for Vancouver.
5	CDD	3.1 Transportation	3.1.2 Existing Conditions, Arterial and Local Street Network and Intersection Operations	14	Table 3.1-7	For the intersections that are failing
6	CDD	3.1 Transportation	3.1.2 Existing Conditions, Transit	15	N/A	Another Vine BRT line (Hwy 99) will modeling? Opening date is 2027.
7	CDD	3.1 Transportation	3.1.3 Long-Term Effects, Arterials and Local Streets in 2045, Intersection Operations	34	N/A	Report says "The park-and-ride opti under any of the design options." - D or that there is no discernible differe impact area study intersections?
8	CDD	3.1 Transportation	3.1.4 Temporary Effects, Active Transportation	47	N/A	Need to make sure that closures/an
9	EPH	3.11 Noise and Vibration			N/A	A larger lid at library square would c
10	PW - Surface Water	3.17 Geology & Groundwater	3.17.2 Existing Conditions, Geologic Hazards	3	N/A	around the 500 interchange, in the s
11	PW - Surface Water	3.17 Geology & Groundwater	3.17.2 Existing Conditions, Groundwater Quality	4	N/A	COV has violated SDWA standards blending will address these but the s shallower and more abundant will m as well as potential shifts in groundw
12	PW - Surface Water	3.17 Geology & Groundwater	3.17.2 Existing Conditions, Groundwater Quality	4	N/A	Safe Drinking Water Act monitoring Vancouver SDWA monitoring is a ch data report showing personal care p septic systems. Infiltration in the IBR potentially mobilizing contaminants
13	CMO	3.19 Climate Change	3.19.1 Changes or New Information Since 2013	2	N/A	Reference to Vancouver's Climate A 2030.
14	CMO	3.19 Climate Change	3.19 Climate Change	1	N/A	This intro makes no mention of the l automobiles and freight, as well as l driving GHGs. This is a critical point must be made.
15	CMO	3.19 Climate Change	3.19 Climate Change	1	N/A	This section should include mention
16	CMO	3.19 Climate Change	3.19.3 Designing for Resilience in a Changing Climate, Other Climatic Factors, Wildfire Risk	6	N/A	Shoud include wildfire smoke's impa
17	EPH	3.3 Property Acquisitions and Displacement	3.3.3 Long-Term Benefits and Effects, Modified LPA	6	Figure 3.3-3	Why are the western most parcels c potential park site and those adjace
18	EPH	3.4 Land Use and Economic Activity	3.4.3 Long-Term Benefits and Effects, Modified LPA, Land Use, Washington	19	N/A	Park and ride facilities would conflic
19	EPH	3.4 Land Use and Economic Activity	3.4.3 Long-Term Benefits and Effects, Modified LPA, Business Displacements	31	Table 3.4-11	Per page 2-11 in the IBR SDEIS Ec data from the results of the latest re employees would be displaced from Economic Activity section of the DS current open spaces within them, sc
20	CMO - Climate	Air Quality	3.10.6 Potential Avoidance, Minimization, and Mitigation Measures	3.10-15		Is "encourage" strong enough wordi REQUIRE going above the baseline sides of the river.
21	CMO - Climate	Air Quality				Suggest adding a more explicit disc benchmarks or standards. It follows
22	CMO - Climate	Air Quality				How will IBR project monitor air qua particularly paths located alongside with close proximity and total, unfilte hazards associated with their travel. being located extremely close to tra

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Item	Department / Division	Chapter/report	Section #	Page #	Figure/ Table #	Comment
23	CMO - Climate	Air Quality				The Air Quality chapter needs to inc transportation is a significant contrib respiratory, cardiovascular, neurode p. 3)
24	CMO - Climate	Air Quality report				After the explanation of what the mo out as expected. What plans does th construction or operation of the brid and they turn out to be wrong?" The mitigation measures are carried out SEIS?
25	CDD	Chapter 4 - 4(f)	Overall			Per 4f determination criteria, De mir and construction shall be confined t use path and potential extension of any tree root impact with the path ar
26	CDD	Chapter 4 - 4(f)	Overall			Per 4f determination criteria, De mir discussion with staff about permane agreed to by City. Ensure that Mayo
27	PW	Climate Change Technical Report	3.3 Climate and Equity Considerations	3-3 (97 of 201)	N/A	top of page, include language regar
28	PW	Climate Change Technical Report	6.1 Design Considerations	6-1 (129 of 201)	N/A	6.1 include language regarding utiliz
29	PW	Ecosystems Technical Report	7.2.1.3 Site Erosion/Sediment Control Measures	7-4 (245 of 266)	N/A	Add language regarding planting qu State. Also include language of erad blackberry and replanting native or
30	CDD	Environmental Justice Technical Report			Table 4-3	The Noise row incorrectly states tha substantial impact would be west of impacts from traffic and LRT in Arna
31	CDD	Environmental Justice Technical Report	4.6			Update this section to reflect the pre Rose Village. The Noise Report disc impacts from LRT and vibration nois disproportionate impacts to EJ popu Noise Exposure Chart (refer to Nois
32	CDD	Environmental Justice Technical Report	4.7.2			"Because low-income populations te reliability would contribute to offsetti section in 3.1.2 (Travel Characterist Equity reports.
33	CDD	Environmental Justice Technical Report	7.2.2 Mitigation for Temporary Transportation Impacts			Recommend the additional mitigatio Hotline to call an on-demand servic
34	CDD	Environmental Justice Technical Report	7.2.2 Mitigation for Temporary Transportation Impacts			"Disruptions to peak period and day construction activities during nighttir consequence of disproportionately a women and people of color are mor https://pmc.ncbi.nlm.nih.gov/articles
35	CDD	Environmental Justice Technical Report	6.2 Indirect Effects	6-2		"If low-income renters were forced t effects." Off to say "could" in this se
36	CDD	Environmental Justice Technical Report	6.2 Indirect Effects	6-2		The City also has housing-supportiv
37	CDD	Environmental Justice Technical Report	3.1.2			The EJ and Equity reports note seve Equity report notes how BIPOC indi 3.1.2 of the Environmental Justice r populations. Refer back to this secti
38	CDD	Environmental Justice Technical Report	6.2 Modified LPA	6-2 (184 of 202)	N/A	Low-income homeowners could ben still cause displacement if the home
39	CDD	Environmental Justice Technical Report	2.5.2.1 Initial Community Engagement (2020-2021)	2-12 (85 of 202)	N/A	How successful were engagement a demographic breakdown for many c
40	CDD	Equity Technical Report				Need more detail to explain the pote typically more reliant on non-auto tra such as residents of Esther Short. V wheelchair, bike, scooter, etc.?
41	PW - Transportation	Equity Technical Report	4.4 Tribal Government Consultation	4-10 (87 of 115)	N/A	The discussion regarding tribes in th communication that is happening be impacts area and how they should b had on spaces that were once occu
42	CDD	Equity Technical Report	6. Indirect Effects	6-1 (94 of 115)	N/A	Reside is cited when talking about n in 2022 should be referenced instea neighborhoods in central Vancouver
43	CDD	Equity Technical Report	4.4 Tribal Government Consultation	4-10 (87 of 115)	N/A	In general, this section feels quite va with Tribal governments and the lev

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Item	Department / Division	Chapter/report	Section #	Page #	Figure/ Table #	Comment
44	CDD	Equity Technical Report	6. Indirect Effects	6-1 (94 of 115)	N/A	I think mention of HCT alignment - p presense of equity priority areas and Proximity to LRT stops could lead to
45	EPH	Land Use Technical Report	4.2.2.1 Park and Rides	4-18 (162 of 193)	N/A	The section states that there are 3 is development is not included in this a land use of downtown and should be
46	EPH	Land Use Technical Report	4.3.15 Park-and-Ride Integration with the Urban Environment	4-27 (162 of 193)	N/A	Park and rides are not consistent wi required to recieve federal funding. urban form and surounding uses
47	EPH	Land Use Technical Report	4.2.2.1 Park and Rides	4-16 (160 of 193)	Figure 4.6	Remove P&R location 3 from report
48	CMO	Neighborhoods and Populations Technical Report	1.2 Modified LPA Construction	1-54 (67 of 162)	N/A	Both commissions have supported t disabled, specifically those with chro them?
49	CMO	Neighborhoods and Populations Technical Report	4.4.10.1 Displacements and Property Impacts	4-15 (147 of 162)	N/A	The Evergreen Inn is anticipated to any mitigation options? What benefi
50	CMO	Neighborhoods and Populations Technical Report	4.4.10.1 Displacements and Property Impacts	4-16 (148 of 162)	N/A	Traffic impacts on neighborhood col
51	CMO	Neighborhoods and Populations Technical Report	4.4.2 Overview of Effects on Vancouver Neighborhoods	4-9 (141 of 162)	Table 4-2	Shumway and Lincoln are absent fr
52	PW	Parks and Recreation Technical Report	4.2.11 Old Apple Tree Park	4-15 & 4-16 (107 & 108 of 148)	Figure 4-6	Old Apple Tree Park. The central ar the new path would enter from the S vs cutting through the ctern of the op path to grade, perhaps a circular loo *comments from 4(f) chapter as well*
53	CDD	Transportation Technical Report	4.6.4 Intersection Operations	4-70 (294 of 1,121)		The report concludes that "The park potential park-and-ride sites would h look at scenarios with one or no par description of the MLPA in the meth adequately understand the potential Library Square site would mean tha users of the Library and future deve carefully managed.
54	CDD	Transportation Technical Report	General			The Draft SEIS should evaluate the the existing supply of parking Down spaces constructed.
55	CDD	Transportation Technical Report	4.10 Transportation Demand Management and Transportation System Management	4-162	N/A	The modified LPA speaks to the phy programs as a part of the modified L education, encouragement, commu
56	PW - Transportation	Transportation Technical Report	4.6.4.2 Subarea 2: Mill Plain Boulevard, Impacts Common to all potential park-and-ride sites	4-82 (306 of 1,121)	Table 4-28	LOS F at multiple intersections with
57	PW - Transportation	Transportation Technical Report	4.6.4.2 Subarea 2: Mill Plain Boulevard, Impacts Common to all potential park-and-ride sites	4-83 (307 of 1,121)	Table 4-29	LOS F at multiple intersections with
58	PW - Transportation	Transportation Technical Report	1.1.5.1 Highways, Interchanges, and Local Roadways	1-44 (64 of 1,121)	N/A	Elimination of the WB SR-500 to Fo Johns interchange and the city stree
59	PW - Transportation	Transportation Technical Report	3.6.4.3 Subarea 3: SR 14, City Center Interchange, and Columbia Way	3-72 (150 of 1,121)	Table 3-22	LOS F at Columbia Shores/Columbi
60	PW - Transportation	Transportation Technical Report	4.6.4.1 Subarea 1: SR 500, Main Street, 39th Street, and Fourth Plain Boulevard, Impacts Common to all potential park-and-ride sites	4-74 (298 of 1,121)	Table 4-26	LOS F at Fourth Plain/Main? Which
61	PW - Transportation	Transportation Technical Report	4.6.4.1 Subarea 1: SR 500, Main Street, 39th Street, and Fourth Plain Boulevard, Impacts Common to all potential park-and-ride sites	4-75 (299 of 1,121)	Table 4-27	LOS F at Main/39th? Which leg?
62	PW - Transportation	Transportation Technical Report	4.6.4.3 Subarea 3: SR 14, City Center Interchange, and Columbia Way, Impacts Common to all potential park-and-ride sites	4-86 (310 of 1,121)	N/A	Not intuitive that there would be no i new traffic to these sites - how can t
63	PW - Transportation	Transportation Technical Report	4.6.4.3 Subarea 3: SR 14, City Center Interchange, and Columbia Way, Impacts Common to all potential park-and-ride sites	4-93 (315 of 1,121)	Table 4-31	Failing LOS at Columbia Shores/Co
64	PW - Transportation	Transportation Technical Report	1.1.4 Downtown Vancouver (Subarea C)	1-41 (61 of 1,121)	N/A	Discussion of proposed westerly shi what those changes are and what o
65	FIRE	Transportation Technical Report	5.6 Arterials and Local Streets	5-4 (399 of 1,121)	N/A	Street and road closures, even durin alternate routes should be identified

This page includes staff comments that were incorporated into the letter, for reference only. There is no need to respond to these comments in addition to those made in the letter.

Item	Department / Division	Chapter/report	Section #	Page #	Figure/ Table #	Comment
66	PW - Stormwater	Utilities	3.6.2	7-13		City of Vancouver owns stormwater that could be potentially disrupted b disruption, and should be discussed facilities, which will need to be reloc
67	PW - Utilities	Utilities				General comments that with further structures in relation to existing utilit
68	PW - Utilities	Utilities Technical Report	General			The City Stormwater Utility is not inc affected corridor. This includes over phases of construction.
69	PW - Utilities	Utilities Technical Report	5.1.2 Potential Temporary Effects – Washington	5-2 (90 of 102)	N/A	The two main crossings north and s not great, just confirming.
70	PW - Utilities	Utilities Technical Report	4.2.2 Potential Long-Term Effects – Washington	4-5 (85 of 102)	N/A	"Loss of the main could affect water flow. Loss of the main in all areas lis
71	FIRE	Utilities Technical Report	4.2.2 Potential Long-Term Effects – Washington	4-5 (85 of 102)	N/A	Multiple references state that fire flo long term, where temporary fire flow to accommodate fire flow may be re
72	PW - Stormwater	Water Quality and Hydrology	3.14.2 Existing Conditions, Stormwater	7 and 8	N/A	The existing stormwater manageme conveyance within the I-5 ROW with contributions, however the existing f the existing flows from outside of the to remain, or be relocated prior to ar
73	CMO - Climate	Air Quality	3.10.4 Temporary Effects	3.10-13		More should be added about specifi disproportionately impacted by cons be similar across all design options strategically for EJ communities and this project. It is not adequate to exc
74	CDD	Environmental Justice Technical Report	2.6.1 Long-Term Impact Assessment Methods	2-21 (94 of 202)	N/A	Archaeology should have specific m and archaeological resources?
75	CDD	Environmental Justice Technical Report	4.2, 4.3, 4.6			There are inconsistencies for how R Resources) says "Because no resid noise conditions, no disproportionat discusses the substantial noise impa between E 33rd Street and E 39th S income and minority populations. Th noise impacts to the Rose Village N Furthermore, the Noise Report show Shumway neighborhood, not the Ro 5/Mill Plain to North Vancouver Traf
76	PW - Surface Water	Water Quality and Hydrology Technical Report	3.3.2.5 Columbia River North Stormwater Watershed (Washington)	3-16 (102 of 150)		The City of Vancouver has over 400 that outfall to the Columbia River. A outfalls for future design.

Attachment E: Draft Guiding Principles for the Community Connector and the Evergreen Station Area

Desired Outcomes, based on community and stakeholder input to date

- The Connector reconnects the east and west sides of I-5, serving as an important active transportation corridor.
- The Connector provides a safe, well-maintained public space that integrates the Downtown and Historic Reserve.
- Reflect local culture, history, and the needs/aspirations of the existing community.
- Coordinate the design with the development of the transit station, Library Square site, and other surrounding uses.
- Support a new "mobility hub" within the Downtown "transit district" (with safe, convenient transfers between modes).
- Build a resilient, adaptable structure (work in a variety of weather, allow change over time).

Place-making Principles

- Integrate the design for the Evergreen Station, the Community Connector, Library Square site, the interface with the Historic Reserve, and the surrounding street network – strengthening the connection between the two sides of the freeway.
- Create an inclusive hub for Vancouver – where community members can gather and all people feel welcome and safe.
- Provide a visual and symbolic "gateway" to Vancouver and the State of Washington – utilizing iconic design.
- Celebrate the local culture of today and honor the many histories of the surrounding area and the city's people.
    - Incorporate story-telling through public art, signage, sound, interactive installations.
    - Include communities on the east side of I-5 in addition to Downtown and other neighborhoods on the west side.
    - In addition to the local culture and history, reflect the regional connectedness promoted by the IBR investments in this area.
    - Support local businesses through information, signage, programming, and partnerships.
- Provide a pedestrian-oriented corridor that aligns with 9th Street runs through the Library Square site and the Connector and supports active uses and special events.
- Design the Community Connector as a calm, inviting, family-friendly place to pass through, learn, and hang out.
    - Incorporate space for community gathering and interaction, as well as passive recreational use.
    - Provide amenities for children – complementary to the library and serving the growing Downtown population.
    - Provide scenic viewpoints.

    - Enable small events, pop-up markets, and group activities – but not necessarily large events. Plan for loading/unloading, space for tents, electricity, and acoustics.
- Explore the provision of public restrooms in this area, recognizing the increased demand from the transit station.

Transportation Principles

- Provide enhanced east-west connections for walking and small mobility modes (e.g., bikes, e-bikes, scooters).
    - Link to the surrounding sidewalk and small mobility networks.
    - Incorporate amenities that support these modes, such as a bike repair kiosk, bike rentals, wayfinding signage.
- Ensure that local bus and bus rapid transit (BRT) connections to and from the Evergreen light rail station are safe, convenient (short), and accessible to all transit riders.
- Ensure that wayfinding through the space is intuitive – with direct routes and clear sight lines to key destinations.
- Ensure that bus turning and through movements support efficient transit operations, while minimizing interference with pedestrian movement.
- Integrate the light rail platform and facilities needed to support transit operations into the space in ways that minimize conflicts with pedestrian flows and sight lines.
- Locate and design pathways to minimize grade changes as much as possible, recognizing the topography of the area and constraints associated with the transportation facilities.

Design Principles

- Design the spaces to recognize and balance the variety of user needs and to prioritize accessibility for people with disabilities.
    - Use universal design and other best practices for designing public spaces and transportation facilities – going beyond Americans with Disabilities Act (ADA) requirements where possible.
    - Consider and incorporate the detailed feedback from people with disabilities and accessibility-oriented leaders provided to the City and IBR to date – while involving this population at every stage of design and implementation moving forward.
- Strategically locate and design Transportation facilities to promote safety – separating faster moving modes from slower moving ones and gathering places.
- Use “Crime prevention through environmental design” (CPTED) principles to promote security and provide “eyes” on public spaces.
    - Activate the spaces through both design and programming (e.g., interactive installations, events, groundfloor uses on Library Square that generate foot traffic).
    - Partner with the Library, the Historic Trust, local businesses, and other nearby property owners, agencies, and community groups to program the space.

    - Strategically locate and design lighting to promote security, while minimizing unwanted spillover.
- Provide a mix of hardscape and vegetation on the Community Connector.
    - Select plants that provide aesthetic and environmental benefits (such as shading and bee habitat) – seeking creative ways to address long-term maintenance challenges.
- The space, including any landscaping, is designed to:
    - be flexible and adaptable (with evolving uses over time);
    - be cost effective to build and maintain;
    - promote environmental sustainability (low carbon materials and methods);
    - be resilient to weather events and reduce the heat island effect; and
    - provide visual, noise, and air quality buffers from the freeway and transit guideway.
- Size the Community Connector to balance the competing objectives for the space, including long-term maintenance and security considerations.
    - Prioritize functional and accessible active transportation connections.
    - Seek creative ways to use the site's challenging topography as an advantage.

Attachment F

Executive Summary: Health Analysis of the Interstate Bridge Replacement Program

Prepared by: Washington State Department of Health, Clark County Public Health, Cowlitz Indian Tribe, 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 is currently undergoing an evaluation through the National Environmental Policy Act (NEPA) to assess potential impacts. The IBR Program is currently (September 20 to November 18, 2024) undergoing 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. **You can provide comment on the DSEIS on the IBR Program website through November 18, 2024 (https://www.interstatebridge.org/DraftSEIS).**

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 the Cowlitz Indian Tribe, 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 final analysis will be complete and submitted as a public comment by the end of the comment period, November 18, 2024. This summary highlights key takeaways for each topic area and an overview of the project recommendations that will be submitted to the IBR Program. The recommendations in the final health analysis will include 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. This includes keeping public health partners, community, and Tribal representation at the table in decision-making for the Program.

Impact Area	Health Effects
Construction of the Modified LPA	• **Access.** Construction changes to roads, public transportation, and bike and pedestrian lanes could negatively impact access to employment, health care, and other needed services, particularly for those that do not have car access. • **Displacement.** The Modified LPA would acquire properties and displace residences and businesses that would disproportionately negatively affect equity priority communities in East Columbia, Rockwood, Esther Short and Rose Village. • **Air Quality.** The DSEIS does not provide sufficient evidence about projected air quality changes under the Modified LPA to properly assess health impacts to air quality during construction.
Long-Term Effects from Modified LPA	• **Air Quality**. Traffic-related air pollution contributes to negative health impacts including respiratory and cardiovascular disease, increased risk of all-cause mortality, cancer, and cognitive development for children. The DSEIS states that air quality will not be impacted, despite estimated increases in vehicle miles traveled. • **Road Safety.** The DSEIS states that crashes will increase by 15% under the Modified LPA, mainly due to estimated increases in traffic volumes. No information is provided on how crash frequency would change by travel mode, crash type, severity, location, or for environmental justice communities. • **Transit.** Mode shift from cars to new transit options under the Modified LPA will likely improve health outcomes related to physical activity. However, transit access to jobs for BIPOC residents, immigrants and refugees, and people under the age of 25 will not increase as much as it is predicted to for white, non-Hispanic residents. • **Noise.** The DSEIS describes higher levels of noise and vibration will negatively and disproportionately impact communities identified as equity priority communities. • **Tolls.** The cost of tolls would disproportionately negatively impact low-income community members.

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 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 temperature extremes, 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

Design with health in mind

1. 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.
2. Design safety features to reduce injury for active transportation users and vehicle users.
3. Improve greenspace and tree canopy cover to improve air and water quality, provide shade, and increase natural spaces.
4. Design with sustainable materials and standards to reduce greenhouse gas emissions.
5. Prioritize resilience to extreme weather events, climate change, and seismic events to improve safety.
6. Maintain and improve good air and water quality in the project area to protect physical and mental health.
7. Minimize excess noise in the project area to protect nearby neighbors and populations disproportionately affected by noise.
8. Maintain and improve connectivity and community cohesion to promote access to community services.
9. Center equity and focus on local businesses in contracting to improve economic opportunities for underrepresented groups.
10. Minimize home and business loss, and proactively support displaced residents, businesses, and employees.

Construct with health in mind

11. Meet and exceed, where possible, state and local requirements to reduce noise and air pollution to protect the health of workers and community members.
12. Design and mark routes during construction to protect pedestrians and active transportation users from injury and environmental exposures.
13. Maintain community connectivity through reliable access to transit, neighborhood services, and regular transportation routes.
14. Protect workers and community members on high-risk days for high heat and poor air quality events.
15. 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.
16. Implement workforce development and support programs to develop and retain a diverse workforce.

Prioritize sustainability, transparency, communication and health for the lifetime of the project

17. 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.
18. 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

19. Assess how design could increase access to health care in the region.
20. Compile and release to the public more information about demolition plans for the current bridges, including a detailed noise assessment 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).
21. Expand information about potential air quality, safety, and connectivity impacts of construction.
22. Compile and release to the public additional information about potential air quality, safety, and connectivity impacts of tolling-related traffic diversion through neighborhoods.
23. Develop and release to the public a detailed sampling and analysis plan of riverbed sediment including potential contaminants, hazardous sediments, and toxics.

To request this document in another format, call 1-800-525-0127. Deaf or hard of hearing customers, please call 711 (Washington Relay) or e-mail civil.rights@doh.wa.gov.

Attachment G: Summary of feedback from people with disabilities and accessibility-oriented leaders

The following highlights key takeaways from recent engagement activities conducted by the City of Vancouver, including:

- Community Connector focus group with representatives from Community in Motion, Northwest Association for Blind Athletes, Pasitos Gigantes, and Washington State School for the Blind and Washington State School for the Deaf (August 2024)
- Disability Community Meeting re: Downtown Parking Plan (June 2024)
- Conversations associated with the Comprehensive Plan Update, Heights District, Main Street Promise, and Waterfront Gateway projects

Pedestrian Infrastructure

- Poorly maintained sidewalks, cracked/uneven sidewalk around street trees and cobble streets present hazards for people who use mobility devices. They often damage people's mobility devices and discourage them from visiting certain locations.
- Pedestrian push buttons need to be low enough for someone in an assistive mobility device.
- Crossing signals need audible walk indicators.
- Remind businesses to keep their A frame signage out of the way.
- 8-10 feet is the recommend for pathway width for Deaf folks to be able to communicate with each other while walking or rolling.
- With shared use paths, guide dogs will pull to the left, which is problematic when bike and pedestrian travel is only split visually.
- 9th Street is a main east-west corridor but one of the most unsafe roads to walk along. 8th and C Street intersection is also unsafe.

Transit Service

- Bus service doesn't always take folks exactly to their destination. Identify high-priority routes between transit pick-up/drop-off locations and major destinations.
- Dedicated pick-up/drop-off zones for people using van services (C-TRAN's C-VAN or Community in Motion) are needed.

Parking & Drop-off Zones

- Accessible parking spaces need 8 feet clearance (typically on the right side of car but some accessible vans have rear entrance) and should be close to ramp that leads to sidewalk/entrance to destination.
- Ensure pick-up/drop-off zones have enough clearance for people with wheelchairs or mobility devices.

- Add more accessible parking than the required minimum.
- Keep in mind the destinations—accessible parking that's blocks away from the destination isn't accessible.
- Enforce accessible parking regulations (e.g., have a placard) and fine violators.
- "Empathetic" signage and marketing campaigns can help curb abuse/misuse of accessible parking spots.
- Parking meters/pay stations and the signage on them needs to be accessible and readable for people in wheelchairs.
- Ensure parking garages (if any are added) are clearly marked and brightly lit.
- Work with local business owners to use private lots on weekends/when not in use.

Construction impacts

- Construction notifications and information about how access will be impacted, particularly for people with disabilities, is critical.
- Offer more thoughtful alternate routes when streets are blocked by construction. Crossing unexpectedly is often not possible for people using a mobility device. Notices posted at intersections could let people know if the street ahead is not accessible.

Communication

- Plan for and provide info in other languages:
    - Braille should always be available, even if there's an audio button to give audible information.
    - Spanish is the second most spoken language, followed by Russian, Ukrainian, and Vietnamese. Vancouver also has a large Chuukese population. QR codes could be used to provide information in other languages.
- Check with experts to ensure Braille and multilingual signage is correct. The Ogden Resource Center at Washington State School for the Blind can help check accuracy of Braille.
- Braille signage should be made in metal and located in a place that a blind person will find it, not above a stairwell or on a bottom stair.
- QR codes are supplemental to Braille, not an alternative to Braille. When using QR codes on public signage, provide a tactile box around the code.

Design guidelines or principles

- Implement universal design guidelines from the **American Society of Landscape Architects** or other organizations, including:
    - Textured paving and textured transitions, helping people understand where they are on the street.
    - Use tactile wayfinding directional strips and different shaped poles for different things (e.g., octagonal pole for transit stop versus round pole for information or speed limit signs).
    - Some spaces have used a different shaped pole to indicate transit stop vs. speed limit sign (octagonal vs. round)
    - Accessible sidewalks, free of obstructions, such as major cracks or rises in the pavement.

    - Accessible wayfinding, including signs with Braille or scannable QR codes for people with low vision.
    - Public spaces and seating options that are comfortable for multiple people using mobility devices.
    - Create **DeafScapes** and design street spaces to better meet **Deafspace design guidelines.**
    - Use colors that help reduce glare and minimize overstimulation for neurodivergent community members.
- Provide green spaces with shade.

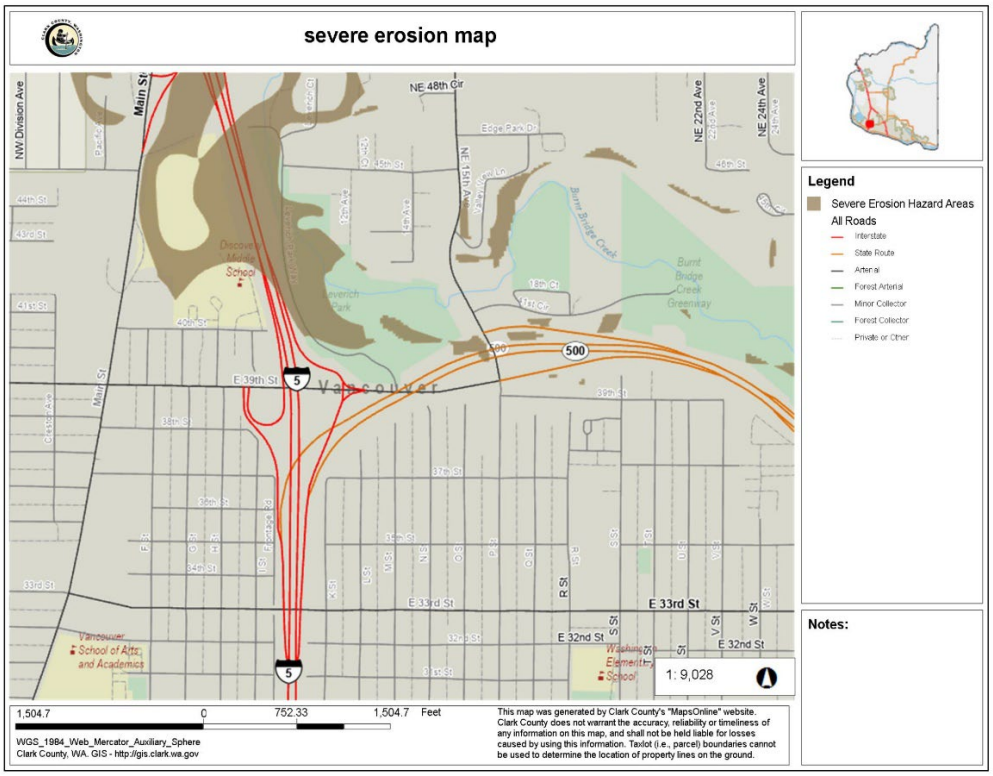
Disability community-featured art:

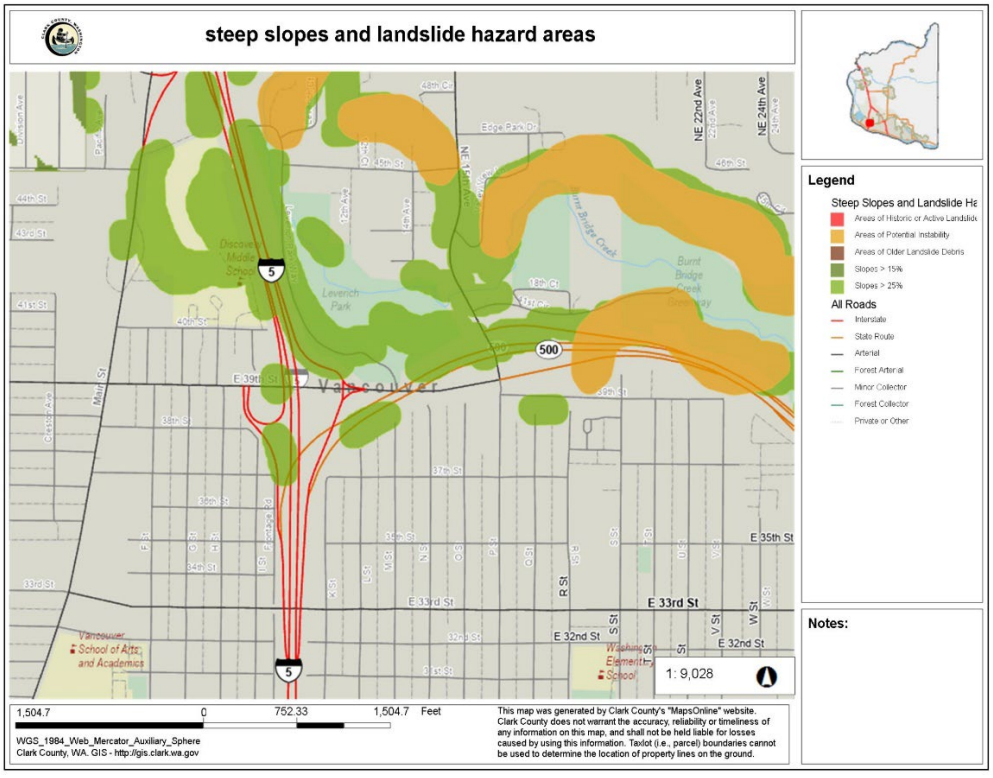
- Vancouver was the birthplace for support and hub for a lot of people with disabilities. It is a special place for marginalized and under-represented communities, especially youth. This history can be brough forward through public art.
- Washington State School for the Blind and Washington State School for the Deaf were part of this community before WA statehood. Could be partners in getting art into place.

Future Engagement

- Connect directly with people who are blind, deaf, have mobility issues during the design process and through implementation to get first-hand experience ("Nothing About us Without Us!" - DDOmbuds.org).
- Vancouver partners to include:
    - Community in Motion
    - National Federation of the Blind
    - Northwest Association for Blind Athletes
    - Pasitos Gigantes
    - Veterans: Clark County Veteran Assistance or Vancouver VA Medical Center
    - Washington Council for the Blind
    - Washington State School for the Blind
    - Washington State School for the Deaf
- Ensure all graphics are accessible for future engagement.
- Provide braille/tactile maps at large gatherings.

Attachment H: Geologic Hazard maps created from [MapsOnline, Clark County WA. GIS.]





MAIN STREET PROMISE

Safe. Accessible. Connected.

CITY OF Vancouver WASHINGTON

Project Overview

The City of Vancouver is investing in the future of Main Street—making it safer, more accessible and connected for businesses, residents and visitors.

A community-led effort nearly 30 years in the making, this project will reconstruct Main Street from 5th Street to 15th Street. The roadway, sidewalks, street lighting and adjacent outdoor spaces will be reconfigured to improve safety, foster a sense of community and drive economic prosperity.

Engagement & Feedback

Over the past year, the Main Street design was developed and refined via community input gathered through presentations at more than 20 City and community boards and commissions meetings, five project advisory group meetings, two open house events and two surveys. The project team also received feedback through numerous online and in-person interactions with property owners, businesses and community members who walk, bike, roll, drive and use public transit to visit Main Street.

Project Improvements & Benefits

Increase safety and mobility

- Curbless streets to increase access and help slow traffic
- Extended and ADA-compliant sidewalks
- Tactile sidewalk treatments and audible crossings for visually impaired community members
- Pedestrian-scale lighting to illuminate sidewalks
- Enhanced intersections and crosswalks
- More bicycle parking
- New traffic bumps to reduce vehicle speed
- Parallel parking to improve visibility for drivers and pedestrians

Welcome visitors and support Main Street businesses

- Removable bollards that can close the street for pedestrian-only events
- Outdoor seating and furnishings
- Year-round decorative lighting
- Pet waste disposal stations
- Six new dedicated spaces for fixed or rotating public art

Improve infrastructure

- Reconstruct water, sewer and stormwater utilities
- Repave the roadway surface and install new traffic signals
- New power access for use during festivals and events
- Electric charging stations for vehicles and e-bikes



The project area covers approximately a half-mile stretch of Main Street from 5th to 15th Street.

Contact the project team

beheardvancouver.org/mainstreetpromise

(360) 487-7940

smallbusiness@cityofvancouver.us

See more project information, including open house exhibits and summaries →

beheardvancouver.org/mainstreetpromise

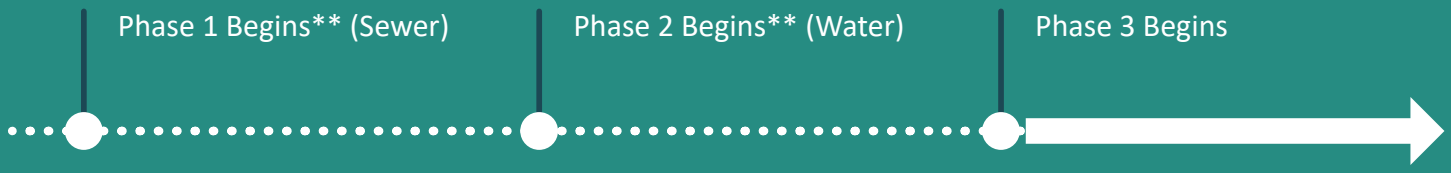
Learn more about project advisory group members and review meeting summaries →

beheardvancouver.org/mainstreetpag

Attachment I

Construction Timeline*

Construction will occur two blocks at a time during each phase.



Summer 2024

Block Captains kickoff

Coffee Corners begin

Winter 2024

2025 to 2026

** Construction schedules are subject to change.*
*** Construction begins at 5th Street*

Construction Approach & Impacts

Main Street construction will happen in three phases to help minimize disruptions to businesses and residents. During each phase, work will occur two blocks at a time. This approach allows for normal vehicle and pedestrian access outside of the construction zone.

Within the two-block construction zone, the contractor will be required to maintain pedestrian access to buildings. Temporary closures to pedestrians (up to 4 hours at a time) will be needed at times to complete work. During those times, accessible detours will be provided. The project team will communicate with affected businesses and property owners in advance to help minimize construction impacts.

Phase 1 (reconstruct sewer utilities) & Phase 2 (reconstruct water utilities)

- Minimal sidewalk impacts, heavy road impacts.
- Construction begins at 5th Street and moves towards 15th Street.
- Temporary business impacts when connecting utilities (4 hours max per closure).

Phase 3 (all other streetscape construction)

- Sidewalk and road impacts.
- Construction begins in two-block increments between 5th Street and 15th Street.
- Temporary business impacts expected (4 hours max per closure).

Supporting Businesses During Construction

The City is committed to working with business owners to ensure that they have up-to-date information and that their concerns are addressed in a timely manner. A Block Captain program will be implemented at the start of construction, ensuring each business has a go-to resource on their block for the latest information. A construction hotline will allow businesses to report concerns and receive support. The project team will also host a series of "Coffee Corners" with business owners, assist businesses with marketing efforts and offer technical assistance for business needs.

Downtown Stakeholders Forum

Regular City of Vancouver and VDA meeting that provides key progress updates. View schedule here: **beheardvancouver.org/downtown-stakeholders**

MAIN STREET PROMISE
Safe. Accessible. Connected.

Project information is also available in Spanish and Russian at **beheardvancouver.org/MainStreetPromise**. If you would like to request interpretation support, project materials in another language or accommodations with a disability, please email smallbusiness@cityofvancouver.us or call (360) 487-7940.

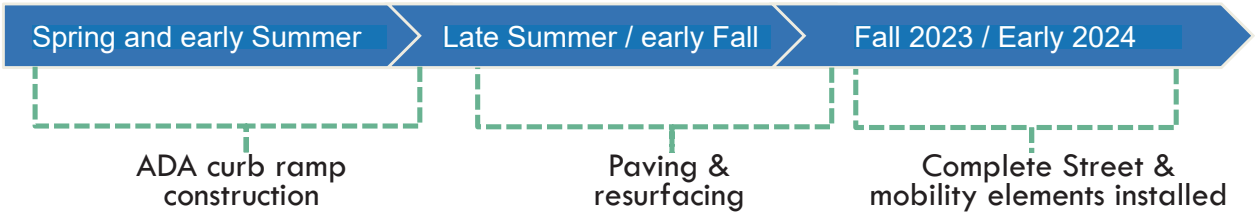
Attachment I

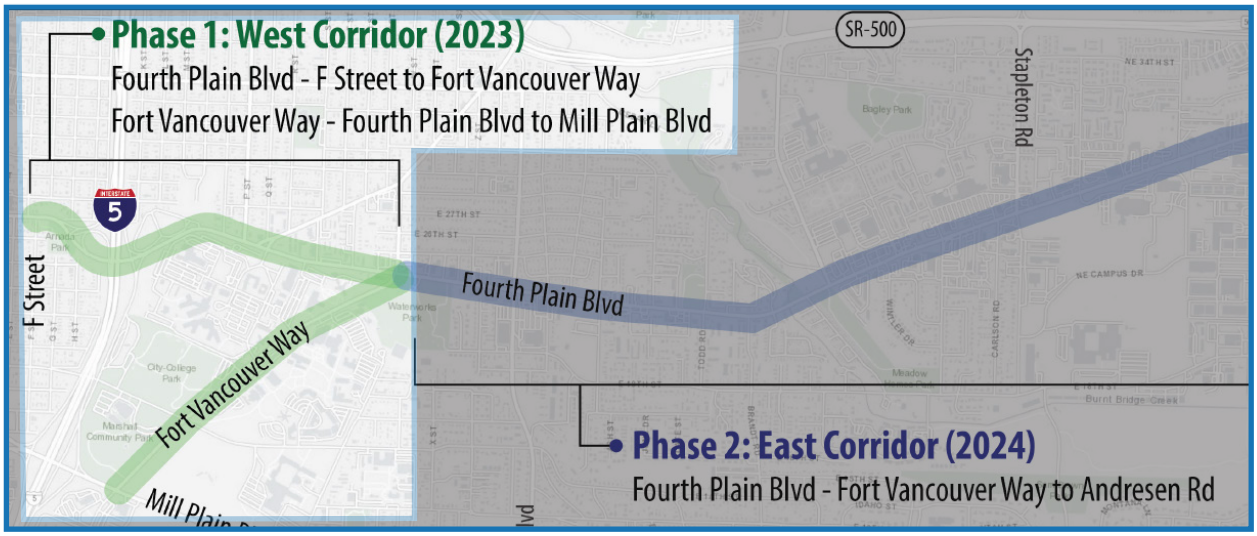
Fourth Plain Boulevard & Fort Vancouver Way Safety and Mobility Project

Project Purpose

- Leverage planned paving preservation project to transform roadway to safely serve all users
- Look at ways to make the streets safer for all including people who drive, walk, ride a bike, use a mobility device, or ride the bus
- Identify other potential safety improvements

Phase 1 Project Extent & Timeline (2023-2024)







Fourth Plain, F Street - Ft. Vancouver Way

- Two-way cycle track on south side of Fourth Plain (2024)

Ft. Vancouver Way, McLoughlin - Fourth Plain

- Improve cycling and transit modes
- Add buffered mobility lanes and BAT* lanes
- Remove on-street parking north of McLoughlin



Ft. Vancouver Way, Mill Plain - McLoughlin

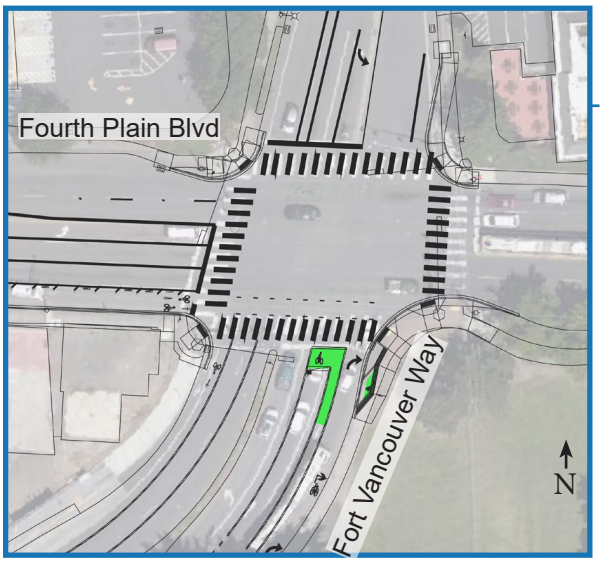
- BAT lanes and buffered mobility lanes on east and west side of Ft. Vancouver Way (2024)

*BAT lanes are for buses and right turning vehicles to access local businesses and streets

Attachment I

Fourth Plain Boulevard & Fort Vancouver Way
Safety and Mobility Project

Phase 1 Fourth Plain Blvd and Fort Vancouver Way Intersection Improvements



Fourth Plain & Ft. Vancouver Way Intersection

- Bi-directional bike lane on south side of Fourth Plain Blvd (west of Ft. Vancouver Way)
- Buffered bike lane on Ft. Vancouver Way with bike box for through and left turn bicycle travel.

Community Engagement

- **Community members were supportive of safety and mobility improvements along Fourth Plain Blvd & Fort Vancouver Way. Respondents were in favor of investments in both public transit and bike infrastructure, with a focus on safety for all road users.**
- **83% of surveyed residents and 88% of small businesses support repurposing a vehicle travel lane to counteract speeding, improve transit reliability and create more safe travel options for pedestrians and small mobility users.**

Next Steps

Phase 1 Completion (2024)

Fourth Plain Blvd, Ft. Vancouver Way

- Complete Street & mobility elements installed

Phase 2 Implementation (2024 and beyond)

Fourth Plain Blvd, Ft. Vancouver Way - Andresen Road

- Add buffered mobility lanes, and BAT lanes
- See the BeHeard Page for more Phase 2 design details

Learn More:

vancouvermoves@cityofvancouver.us

beheardvancouver.org/fourth-plain-fort-vancouver-mobility

CITY OF Vancouver WASHINGTON

Attachment I

29th & 33rd Streets
SAFETY & MOBILITY PROJECT

CITY OF Vancouver WASHINGTON

The 29th and 33rd Streets Safety and Mobility Project is exploring how to improve safety and mobility for all people using 29th Street between Kauffman Avenue and Neals Lane, and 33rd Street between Kauffman Avenue and Grand Boulevard. These roads connect Vancouver neighborhoods separated by Interstate 5 (I-5) and provide important connections to other roads, such as Main Street, St. Johns Boulevard and Grand Boulevard.

This project is coordinating with pavement work planned for 2025 between I-5 and St. Johns Boulevard and the longer-term reconstruction of the I-5 overpasses through the Interstate Bridge Replacement Program.

Preliminary Design Considerations

- **Complete Streets policy:** Ensures all people can share the road safely and comfortably
- **Vancouver Transportation System Plan:** Identifies the project roadways as important community connections on the pedestrian and bike/small mobility networks
- **Existing conditions analysis:** Evaluation of traffic volumes, speeds, crash data, parking occupancy, roadway condition, and identification of safety and accessibility issues

Project Timeline

March - May 2024
Assess existing conditions within the project area.

June - July 2024
Share project information and gather your feedback on opportunities for improvements along the corridor.

August - October 2024
Share design recommendations and gather your feedback on near-term and long-term investments.

2025 – 2026
Implement the near-term improvements through planned pavement work and evaluate project impacts.

Project Area Map



Visit the project website to learn more, sign up for email updates and share your comments!
beheardvancouver.org/29th-and-33rd-safety

To request accessible formats or other languages, contact:
VancouverMoves@CityofVancouver.us
360-487-8000 | WA Relay: 711

CITY OF
Vancouver
WASHINGTON

November 18, 2024

Interstate Bridge Replacement Program
Attn: Greg Johnson, Program Administrator
500 Broadway, Suite 200
Vancouver, WA 98660

RE: City of Vancouver Comments on the Interstate Bridge Replacement Program Draft Supplemental Environmental Impact Statement

Dear Administrator Johnson,

Thank you for you and your team's continued coordination and work with partners to achieve a Draft Supplemental Environmental Impact Statement (Draft SEIS) and Section 106 Report. City of Vancouver staff has reviewed these documents and we are pleased that the analysis affirms intended benefits of the Modified Locally Preferred Alternative (Modified LPA) and demonstrates consistency with the Interstate Bridge Replacement (IBR) Program's Purpose and Need. The proposed investments reflect extensive collaboration among Program partners and community engagement.

Following are staff's comments on the Draft SEIS with particular focus on Chapters 3 (Existing Conditions and Environmental Consequences along with accompanying technical reports) and 4 (Section 4(f) Draft Evaluation). Comments regarding the Program's Section 106 report are embedded in Chapter 3.08, Cultural Resources and in alignment with Attachment A. Our comments are based on the following policies, plans, and regulations as guidance:

- City of Vancouver Desired Outcomes Resolution (2021)
- City of Vancouver Conditions of Approval for the Modified LPA (2022)
- IBR Modified LPA Commitments (2022)
- Federal agency requirements and funding considerations
- Existing City plans: *Comprehensive Plan (2011-2030), Parks, Recreation, and Cultural Services Comprehensive Plan, Climate Action Framework, Urban Forestry Management Plan, Housing Action Plan, and Reside Vancouver Anti-Displacement Strategy*
- City plans recently adopted or underway: *2023-29 Vancouver Strategic Plan, 2024-2044 Transportation System Plan, Comprehensive Plan Update (currently underway), Citywide Equitable Development Strategy, Economic Development Strategy, Downtown Redevelopment Study, Downtown Access, Mobility and Parking Plan, and Update to Downtown Design Guidelines*.

In addition, comments have been developed through consultation with City subject matter expert staff, feedback from the Vancouver community collected during the comment period through numerous IBR-led events, and through City-led discussions with the following City advisory bodies:

- Mayor and City Council members
- Parking Advisory Committee (10/9/2024)
- Parks and Recreation Advisory Commission (10/16/2024)
- City Center Redevelopment Authority (10/17/2024)
- Planning Commission (10/22/2024)
- Aviation Commission (10/23/2024)
- Transportation and Mobility Commission (10/29/2024)
- Culture, Art & Heritage Commission (11/7/2024).

In general, we find that the Draft SEIS reflects consistency with the City of Vancouver's Desired Outcomes Resolution (2021), Conditions of Approval for the Modified LPA (2022), and IBR's Commitments for the Modified LPA (included in Attachment B). The comment letter calls out where City staff recognizes that more work is needed to fully achieve some of these provisions and, as development of a Final SEIS proceeds, City staff will continue to affirm consistency with provisions in these documents. Additionally, there is a need to indicate which elements are included as required Program measures per federal standards/regulations, mitigation measures, which will be addressed in subsequent phases of work, and which may be defined as Community Benefits through the Community Benefits Advisory Group process.

As the program shifts into focusing on detailed designs, it will be important for the City and public to be highly engaged. The engagement process should build up IBR's advisory groups, Community Benefit Organization (CBO) partnerships, and communication channels, but should be expanded to include other methods to ensure that all interested parties and voices are involved. In the coming months, we recommend working with the cities to develop a plan for engaging partner agencies and the community in the Conceptual Design Report and other design documents. This would support the City's Conditions of Approval that: "engagement must be accessible and open to a wide variety of stakeholders and all community members" and "recreational and open space design shall be determined in collaboration with Program partners and the community."

For reference, Attachment C summarizes feedback we heard from City of Vancouver Advisory Bodies and general public. Attachment D includes additional administrative comments on the Draft SEIS.

On behalf of City of Vancouver staff and leadership, we look forward to continuing the important IBR Program work together.

Sincerely,

Katherine Kelly

Katherine Kelly
Policy Advisor

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Community Connectors

Evergreen Area

City staff has begun a collaborative process with the IBR team to develop a site plan for the Community Connector, a proposed freeway lid defined within the Modified LPA adjacent to the future light rail station near Evergreen Boulevard. The process has involved focus groups with community leaders and interested parties in August 2024, the creation of an initial list of guiding principles for the Connector and its surroundings (Attachment E), and submittal of a federal grant application to help fund construction. As a next step, the City and IBR are planning to conduct community engagement on alternative concepts for the Community Connector beginning in early 2025.

- Continue to support a collaborative, community-oriented process for developing a site plan for the Community Connector.
- Incorporate the initial desired outcomes and guiding principles for the Community Connector and its surroundings, which reflects early feedback from community leaders and interested parties (Attachment E).

Waterfront Area

Under the Modified LPA, the height of a new bridge would open up land under I-5 at the Vancouver waterfront. An extension of Main Street underneath the freeway from central Downtown to the waterfront is planned. New east-west active transportation connections are also envisioned in this space, including a new path from Main Street to Old Apple Tree Park and a segment of the Renaissance Trail. It will be important to design this space with activation for public use, accessibility for all, safety, security, and consideration of long-term maintenance and operations in mind. The following are initial guiding principles for design of the space, for incorporation into the Final SEIS and the design process moving forward:

- Serve the region's diverse and growing community, connect Vancouver's waterfront, and integrate with existing and forthcoming open space investments (City of Vancouver Desired Outcome).
- Design active transportation facilities to be safe and accessible for all with direct, intuitive connections to existing networks of public spaces, parks, and recreation facilities.
- Use "crime prevention through environmental design" (CPTED) principles.
- Ensure coordination between the City, WSDOT, Port of Vancouver, TriMet, National Park Service, and adjacent property owners in developing the long-term plan for the maintenance and activation of the area.
- Based on Community Benefits Advisory Group (CBAG) recommendations:
    - Create riverfront public access points and provide recreational opportunities, communal and open space including areas for fishing and hiking on both sides of the river, where feasible.

- Explore opportunities to develop community spaces, such as an inclusive civic center with shared parking for the public market and transit station.
- Integrate river access with public spaces and stormwater facilities.

Shared Use Path (SUP) Landing at Vancouver Waterfront

- In section 4.8.2.1 of the Transportation report, acknowledge an adverse impact for active transportation users due to the increased bridge height, which requires SUP users to travel a greater vertical and horizontal distance to reach the bridgehead from the waterfront. The conceptual design for the ramp connection shown in the Draft SEIS does not fully meet the following City of Vancouver Condition of Approval: *Active transportation facilities shall be designed to facilitate a comfortable, low stress experience during all seasons and in all types of weather, prioritize safety of vulnerable users and ensure safe and convenient access from the local network to new facilities*.
- While the proposed ramp would be designed to meet or exceed Americans with Disabilities Act (ADA) requirements, some users may not want to or be able to use this ramp due to its length and potential conflict with users traveling at faster speeds. Address this issue through design of the ramp and by pursuing multiple design options for connecting the bridge's SUP to the waterfront, Downtown, and Fort Vancouver Historic Reserve – considering the wide range of user groups and their various abilities, needs, and preferences. This includes consideration of other ramp alignments, elevators, and integration with transit stations.
- Consider extending the SUP from the bridge over the Columbia River to the Community Connector and Evergreen Station, in addition to connections at the waterfront.
- Limit the number of columns supporting the SUP ramp connection to the waterfront as much as feasible in order to create a more usable and inviting space.

Path connecting Main Street Extension to and through Old Apple Tree Park

- Avoid impacting mature trees, especially those within Old Apple Tree Park.
- Design for easy access to annual Old Apple Tree Festival, considering large crowds.
- Maximize contiguous open space while providing a direct path from Main Street to the park's entrance.
- Consider expanding the footprint of Old Apple Tree Park in order to integrate with space that will open up under I-5 in the waterfront area.

Process moving forward

- Continue to work with the City to develop and implement a community engagement process to inform decisions about design, use, and operations and maintenance of the Waterfront area.

Applicable to both areas

Based on potential recommendations from the CBAG, incorporate the following principles into the design and operation of both station areas:

- Include bicycle amenities (repair kiosks, etc.) near the stations. (While this is assumed to be included already, section 1.1.4.2 in the Alternatives Description of each report is not explicit about bike amenities).
- Explore creative solutions to ensure accessibility in constrained spaces.
- Consider the provision of public restrooms near the transit stations.
- Improve mobility and accessibility for all users at transit stations and the shared use path by connecting spiral ramps, elevators, and stairs with resting areas.
- Provide adequate shelter for all weather conditions at transit stations.

3.01 Transportation (Transportation Technical Rpt.)

Active Transportation

- Include reference to the City of Vancouver's 2024 – 2044 Transportation System Plan (TSP) definition of small mobility in the description of planned active transportation improvements. According to the TSP, small mobility devices include but are not limited to: scooters, one-wheels, bikeshare bicycles, e-bikes, and cargo bikes. *Renaming bike lanes as "mobility lanes" provides a more inclusive term for the many different types of devices we need on our streets to meet our climate goals*.
    - Describe how the Modified LPA will account for the range of small mobility devices that will be used on the new active transportation facilities – acknowledging the importance to plan for the full range of existing and emerging modes. This is consistent with CBAG recommendations on "future proofing" and the City's TSP, which says: *The term "mobility lane" also helps us account for the emerging speed differential between bikes, e-bikes, and other mobility devices*.
    - Analyze the safety and accessibility of the proposed bike facilities and shared use paths (including the one on the new bridge and its connection to the Vancouver waterfront) through the lens of small mobility – considering speed differential across modes, spatial needs, and other design factors.
- Consider and incorporate the following CBAG recommendations related to active transportation:
    - Consider maintenance, safety, active management, and future proofing in the design aspects of the multi-use paths throughout the program area.
    - Develop robust trail systems that surpass federal requirements, leveraging creative solutions to increase functionality and community value, and are responsive to the community's needs and input.

    - Enhance safety for bicyclists and pedestrians crossing the bridge by incorporating protective features into the design (such as the spacing of the railing/gaps).
    - Provide wayfinding signage to aid navigation, focusing on recreational and transportation users.
    - Provide adequate bicycle signage and wayfinding, both during construction and after program for safety enhancement in local communities.
    - Provide shelters, water, and bathrooms for different users, with a focus on those using paths for both recreation and essential travel.
    - Expand the bridge's bike and pedestrian paths and install barriers to separate them from vehicular traffic, enhancing both safety and noise reduction. Consider design treatments to reduce exposure to wind and vehicle exhaust.
    - Design active transportation facilities to create a comfortable, low-stress experience, prioritizing the safety of vulnerable users and providing convenient access from the local network to new facilities.
    - Incorporate safety metrics such as parent comfort level for bike paths and level of traffic stress in urban design to ensure user-friendliness and safety.
- Work with the City and community (especially Neighborhood Associations adjacent to or overlapping) to ensure the 29th and 33rd Street overpasses are more comfortable for people walking, rolling, biking, and using small mobility devices.

Local Streets

- Further analyze findings related to traffic impacts on the local transportation system from increased bus service in the downtown area, including C-TRAN Highway-99 Bus Rapid Transit (BRT) service.
- Evaluate the impact of elimination of the westbound SR-500 to Fourth Plain Blvd interchange on the existing SR-500/St. John's interchange and streets (including Mill Plain interchange area) that lead from this interchange to the Fourth Plain corridor.
- Consider mitigation needed on the City's local roadway pavement structure due to construction vehicles using local roadways to access construction areas.
- Provide more detail about which intersection movements/legs are failing in the Existing Conditions and the Modified LPA.
- Clarify the mitigation for the Columbia Shores and Columbia Way intersection since delay is made worse with the Modified LPA option.
- In section 3.1.3 of the Transportation chapter, clarify why the demand volume across I-205 bridge in 2045 would be 3% lower as compared to the No Build.

Transportation Demand Management (TDM)

- The Modified LPA speaks to the physical infrastructure to meet the non-single occupancy vehicle (SOV) travel needs but does not speak to continuing existing TDM programs. To fulfill IBR's commitment to develop a comprehensive TDM program, the Final SEIS needs to identify more TDM strategies than just physical infrastructure like education, encouragement, communications and marketing, and subsidies and incentives. Address the City's Condition of Approval to develop strategies for managing auto demand and congestion during peak traffic periods, supporting downtown Vancouver's circulation goals, and reducing greenhouse gas emissions – in addition to using variable rate tolling.
- Elaborate on potential impacts to – and options to enhance - TDM and TSM during construction.

Tolling

- Align the summary of tolling impacts in Chapter 3.01 with the detailed discussion on tolling in the Transportation technical report:
    - Include the information on diversion to I-205 in Chapter 3.01 in Section 4.11 (Tolling and Diversion).
    - In section 4.11, clearly explain how the analysis arrived at the key findings listed in Section 4.11.3, particularly those related to diversion to the I-205 Bridge and changes in destination choice. The report refers to multiple appendices, making it hard to understand the rationale for the key findings.
- Clarify how the diversion effects from tolling may vary over time (as people make adjustments to their travel patterns) and vary across time of day (e.g., the possibility for more diversion to I-205 during off-peak hours).
- To address opposition to pre-completion tolling that City staff has heard, there should be clear and robust information shared immediately about preventive measures the Program will take to address noise, vibration, construction dust, maintenance of traffic on both the I-5 mainline and within neighborhoods adjacent to the Program. Note that one neighborhood stated they are not opposed to tolling post-construction but are opposed to tolling starting during construction, for the reasons noted above.

Safety

One of the City's Desired Outcomes is to "Reduce collisions on local roads leading to and within downtown." Additional information and potential mitigation measures are needed to achieve this outcome.

- In section 4.9.2.2 of the Transportation report, clarify what type of crash risk could increase at the Evergreen Boulevard/C Street intersection. Clarify the contribution to volume changes at this intersection due to trips associated with the Evergreen transit station and park and ride (options 2a or 2b). Identify potential mitigation that would reduce the crash risk.

- The Draft SEIS says that under the "No C Street Ramps" option, the potential for crashes at the Mill Plain interchange increases because there would be more traffic at that location. Of the 55 intersections in the Vancouver study area (Table 3-37 in Appendix G of the Transportation Technical Report), Mill Plain Blvd and I-5 NB on-/off-ramps had the second highest number of crashes (30). Therefore, regardless of the change in overall crash risk in Vancouver, any increase in the number of crashes at the Mill Plain interchange would be problematic and would require mitigation.
- Evaluate and consider the recommendations provided in the Executive Summary of the IBR Health Analysis prepared by the Washington State Department of Health, Clark County Public Health, Cowlitz Indian Tribe, Oregon Health Authority, Multnomah County Health Department (Attachment F). The City of Vancouver supports this effort in general and the following recommendations related to safety specifically:
    - Design and mark routes during construction to protect pedestrians and active transportation users from injury and environmental exposures.
    - Expand information about potential air quality, safety, and connectivity impacts of construction.
    - Compile and release to the public additional information about potential air quality, safety, and connectivity impacts of tolling-related traffic diversion through neighborhoods.

Freight

- Continue coordination with partners to ensure that high, wide and heavy cargo can safely move through the project area. In alignment with the Port of Vancouver, the City 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).
- Ensure the continued facilitation of High, Wide, and Heavy freight movement through the project area. Specifically, the following elements are critical:
    - Safety shoulders of at least 12 feet on both sides for both directions of traffic.
    - Grades not exceeding 4% on the main profile.
    - Turning radii of at least 100 meters NB from the Mill Plain interchange.
    - Height clearances of at least 20 feet under the Mill Plain interchange and throughout the project area.
    - Toll gantries need to have at least 25 feet of clearance to allow freight movement underneath.

Temporary Effects

- Provide multilingual support to transit agency partners during and post construction so that changes or impacts to transit service does not endanger the livelihoods of non-English speakers who rely on transit for their primary mode of transportation.

- Incorporate the potential CBAG recommendation to: “Increase public transit services and explore alternative routes to mitigate transportation impacts to transit riders, walkers, bikers, rollers, and people using mobility scooter during construction, including the implementation of shuttle buses and additional bus routes along the impacted routes in the cities of Vancouver and Portland.”
- Ensure that any closures or detours for pedestrian circulation provides an ADA accessible option.

3.02 Navigation (Navigation Technical Rpt.)

- City staff advocates for ongoing efforts to work with the owners and operators of impacted vessels to identify mutually acceptable measures that result in a fixed span bridge.
- Continue advocating for a Preliminary Navigation Clearance Determination from the US Coast Guard as soon as possible, followed by approval of a permit to enable construction of a fixed span bridge.

3.03 Property Acquisitions and Displacements (Acquisitions Technical Rpt.)

- Provide a range of degree/severity and general parameters describing potential impacts for partial acquisitions, temporary easements, and subsurface easements. For example, Section 5 of the Acquisitions report describes the types of temporary acquisitions required and quantifies the number of easements needed for each subarea and land use type; however, it does not analyze the potential impacts from the temporary use, such as the potential for property damage.
- Clarify why the parcel with the existing Vancouver Community Library is shown as a partial acquisition (i.e., Park and Ride facility).
- The Acquisitions report indicates that the realignment of W 3rd Street could require full acquisition and displacement of the office building located on the southeast corner of W 4th Street and Columbia Street. This building is the “Lucky Lager Warehouse”, which is listed on the Clark County Heritage Register. Although it is not eligible for National Register of Historic Buildings, displacement of this building should be avoided if possible. Seek design adjustments to avoid the full acquisition and displacement of the Lucky Lager building.
    - If acquisition of the Lucky Lager Warehouse is unavoidable, coordinate with the City and property owner(s) to determine potential land uses for this block, pending final design of the transportation improvements adjacent to this site.
- Consistent with the potential CBAG recommendation, ensure that the real estate process, including outreach and negotiations, provide for language access and culturally specific and relevant services.
- Potential impacts to residential properties north of Fourth Plain are of particular concern. IBR should pay extra attention to working with property owners and

tenants in this area. Inspections prior to construction upon owner agreement and other relative recommendations discussed as part of the CBAG "Avoid Further Harm" category apply here.

3.04 Land Use & Economic Activity (Land Use and Economics Technical Rpts.)

- Update references to the City's Strategic Plan (2023-2029) and TSP (2024-2044) to reflect the adoption dates. This includes but is not limited to section 2.3.4 in the Land Use report.
    - Analyze consistency of the Modified LPA with the City's recently adopted plans in the Land Use report.
- Consider the City's current planning work in the development of mitigation measures and future designs. This includes the 2025-2045 Comprehensive Plan update, Downtown Access, Mobility, and Parking Plan, Downtown Redevelopment Study, Downtown Design Guidelines, Waterfront Gateway redevelopment, and Citywide economic and equitable development strategies. Coordinate with City staff to get up-to-date information on these efforts.
- Update Section 3.3.2 of the Land Use Report to reflect updates and corrections to recent and pending development, as listed in Attachment D.
- Page 2-11 of the Economics report states that the "employee-per-square-foot ratios for business types used data from the results of the latest reported ratios from Metro modeling (Metro 2015, p.8)." In doing so, the Draft SEIS estimates that 400 employees are associated with the 10 downtown Vancouver businesses that would be displaced, as shown in Table 3.4-11 in the Land Use & Economic Activity chapter. In order for the program to support displaced businesses and employees, a more accurate count is needed.
    - Conduct additional analysis of the existing businesses that would be affected by any business displacements in Downtown Vancouver. Consult with the business owners to get an accurate employee count and to understand their specific needs for relocation.
- Coordinate with the City and property owners to address the potential for construction to cause negative economic effects by possibly blocking visibility of storefronts and impacting access to businesses in Downtown.
- Work with the City and southwest Washington partners to redesign the area just east of I-5 near the waterfront (Kirkland development area) to ensure no loss of function, access, or economic opportunity.

3.05 Neighborhoods & Equity (Neighborhoods & Populations, Equity, Technical Rpts.)

Neighborhoods and Population

- Table 4-2 (Overview of Anticipated Effects on Vancouver Neighborhoods) in the Neighborhoods and Population technical report (Neighborhoods report) only includes 7 of the 10 Vancouver neighborhoods in the program area; it is missing the

first three discussed in Sections 4.4 and 5.3). In addition, the discussion on the potential impacts and benefits in Sections 4.4 and 5.3 is inconsistent across neighborhoods in Vancouver. For example, the Draft SEIS does not make a finding about the impact of displacement on neighborhood cohesion for Shumway, but it does for Esther Short. The discussion the Hough neighborhoods is only one paragraph. Some discussions mention impacts to parks in the neighborhood, while others do not.
    - Update the summary of effects on each neighborhood in Sections 4.4 and 5.3 to follow the same outline to enable a more complete picture, even when the finding is "no impact."
    - Include temporary and long-term effects on applicable parks and recreation facilities and clarify if any of these effects would have adverse neighborhood impacts.
    - Include all 10 Vancouver neighborhoods in Table 4-2.
- The Neighborhoods Report says "The Evergreen Inn, immediately north of the SR 14 interchange, is also anticipated to experience noise impacts that cannot be mitigated. Please see the Noise and Vibration Technical Report for discussion of noise impacts and mitigation for the Modified LPA." However, the Noise and Vibration report does not mention the Evergreen Inn, and Tables 4-4 and J-3 do not show an impact for the closest receptor location (DT-036). Section 4.6.2.4 of the Noise and Vibration report predicts a moderate noise impact at the Normandy Apartments due to light rail noise and identifies mitigation in section 7.7.2.1, but this impact and mitigation is not mentioned in the analysis of impacts to Esther Short in the Neighborhoods Report.
    - Confirm and update the anticipated noise impacts to Esther Short in the Neighborhoods Report to align with the findings in the Noise report.
- Section 4.1.10 of the Neighborhoods report finds that the "No C Street ramps" design option could reduce neighborhood cohesion in the Esther Short neighborhood by substantially increasing travel delay for residents and people accessing the neighborhood. However, this potential impact is not acknowledged in Table 4-2 (Overview of Anticipated Effects on Vancouver Neighborhoods). In addition, the Program-specific mitigation for impacts on neighborhood cohesion included in section 7.1.2 is too vague, as written.
    - Acknowledge the potential impact to neighborhood cohesion in the Esther Short neighborhood resulting from the "No C Street ramps" design option in Table 4-2, and identify specific measures that would mitigate this impact, if that design option is selected.
    - Identify specific measures to mitigate neighborhood cohesion impacts resulting from impacts to Marshall Park in the Central Park neighborhood) and from the potential business and residential displacements in the Esther Short neighborhood (depending on the design option).

- Per the Health Analysis report (Attachment F), modeling is on too large of a scale to understand local health impacts in the program area.
    - In the Neighborhood report, provide additional analysis and define efforts to mitigate any health impacts, such as green infrastructure and indoor air filtration.
- Leading up to and during the Draft SEIS comment period, City staff has heard concerns about construction impacts from Vancouver community members. There is particular concern about dust, noise, and vibration during construction. Residents and businesses in the Esther Short neighborhood are worried about impacts to Downtown circulation due to increased traffic congestion – including pedestrian safety, reliability of affected bus routes, access to businesses, ADA accessibility. Residents of Smith Tower and Esther Short neighborhood are concerned about the ability for emergency vehicles to respond to calls for services (particularly for senior housing, including Evergreen Inn). Residents of Shumway are concerned about cut-through traffic when the 39th and 33rd overpasses are closed/being rebuilt. Arnada neighborhood has concern about construction-related impacts to Arnada Park. The Neighborhoods and Population technical report (Neighborhoods report) affirms concerns about adverse effects on cohesion, including "given that the potential construction duration could be up to 15 years, neighborhood quality and cohesion could be negatively impacted during construction for neighborhoods adjacent to the corridor".
    - Continue to coordinate with City staff to identify specific measures that will reduce and avoid construction-related impacts on neighborhoods. This includes impacts related to traffic, pedestrian and bicycle networks, and access to businesses, residences, and community resources such as parks, schools, and public spaces.
    - Work with the City to develop and implement a strategy for managing construction impacts in Downtown that includes support and outreach to businesses.
    - Include a mitigation that will ensure dust control in areas where outdoor sports are played. Use of water trucks during construction is proposed.
    - Ensure ongoing communication and engagement with residents, businesses, and community groups in the program area. Provide timely information about construction timeline, potential construction-related effects and the measures taken to reduce and avoid impacts. Provide notifications of any construction disturbances as soon as practical.
    - Coordinate with the City of Vancouver's community engagement, communications, and IBR teams to utilize the City's outreach and engagement channels.
- Consider and incorporate the following potential recommendations from the CBAG:

- Develop a proactive communication plan for before and during construction to keep the public informed of potential impacts such as noise, route closures, other mobility impacts, etc.
- Include communication for transit/mobility impacts as soon as possible, as well as messaging to homeless service providers.
- Establish a comprehensive process for community members to voice concerns and report negative impacts, potentially including an online platform and/or hotline where community members can report issues and receive timely responses, ensuring a commitment to responsiveness and due diligence to reach resolution. Explore the use of AI.

Equity

The Equity report, as well as the Environmental Justice report, demonstrate IBR's commitment to "prioritize access, influence, and decision-making power for marginalized and underserved communities throughout the program". Additional analysis, mitigation, and engagement is needed to fully achieve the City's Conditions of Approval, as noted in this section and under Environmental Justice below.

- Section 6 of the Equity report (Indirect Effects) does not fully characterize the City's *Reside Vancouver*, which was prepared in 2019 and focused on two neighborhoods in Central Vancouver. Since then, the City has developed citywide data sources. In Section 6:
  - Refer to the City's Displacement Risk Analysis and Map completed in 2022 to characterize equity priority communities and displacement risk within and outside of the program area (including it the Fourth Plain area just east of the program area).
  - In addition to the statement that low-income homeowners could benefit from a rise in property values, acknowledge that the risk that rises in property values can still cause displacement if the homeowner is not able to afford the corresponding increase in property taxes over time.
  - Mention how proximity to light rail stations could lead to increased risk of residential displacement.
  - Align with the updated discussion of indirect impacts and mitigation in the Environmental Justice report.
- In response to concerns about indirect displacement and the goal to maximize benefits to equity priority communities, the CBAG has affirmed the recommendations to support transit-oriented development (TOD) and to "prioritize innovative developments on the land adjacent to the bridge, with a focus on projects that promote accessible and affordable housing." The CBAG is also considering recommendations to "develop affordable housing near transit areas" and "prioritize the development of affordable housing by developing underutilized properties." Staff supports these concepts and encourages the IBR Program to:

    - Work with the City to explore opportunities for TOD in Vancouver as part of the IBR Program and community benefits work.
    - Work with the City and partners to pursue funding for TOD to support affordable housing development near the light rail stations.
    - Build upon the City's preparation and assumed adoption of an Equitable Development Strategy and other Downtown planning efforts and work with City staff to identify any additional infrastructure or access needs beyond IBR and City planned actions, and anti-displacement and community stabilization measures specific to Downtown and the Esther Short neighborhood.
- Accessibility of the transit and active transportation networks to people of all ages and abilities is a top concern. While the Equity report discusses many of the transportation benefits of the Modified LPA and acknowledges that "differences in the experiences of active transportation users could adversely affect equity priority communities more than the general population", the Program-specific mitigation does not align with the discussion of potential impacts and design considerations.
    - In Sections 4 and 5 of the Equity report, provide more details on how the various equity priority communities could experience differences in the ability to use and benefit from the Modified LPA investments, and identify measures to address any potential impacts.
    - In Section 4.2, discuss the potential challenges to various equity priority communities associated with "extensive ramp distance" connecting the shared use path on the bridge to the waterfront, as discussed in the Transportation report. For example, older and younger people may have less stamina, and blind/hearing-impaired travelers have greater risks. Refer to the discussion on the Waterfront Area above for recommendations on how to address equitable accessibility concerns with the shared use path.
    - Integrate design considerations and community input listed in Sections 4.1.4 and 4.2 into the Program-specific mitigations in section 7.1.2 to ensure these important details do not get lost. Add to this list:
        - Design facilities for all ages, including young people and older adults.
        - Considering accessibility for blind and deaf people in all stages of program design and implementation.
        - Treat ADA as the floor, not the standard – implement the Public Right-of-Way Accessibility Guidelines (PROWAG) as current best practice for design and construction.
    - Consider and incorporate the feedback from accessibility-oriented community leaders and people with disabilities provided to the City of Vancouver (Attachment G).
- Explore and incorporate the following CBAG recommendations:
    - Use universal design and be radically inclusive

    - Consider accessibility in the selection of materials for transit areas, such as textured pavement.
    - Prioritize mobility and accessibility in the design of elevators and staircases, along with considerations for aesthetics.
    - Incorporate innovative solutions to exceed ADA requirements, enhancing accessibility and mobility thoughtfully.
    - Integrate acoustic enhancements in designs to better accommodate individuals with visual impairments, ensuring path support.
    - Incorporate green spaces and water stations at public transit locations to accommodate service animals, especially during hot days.
    - Involve experts with lived experience and the broader community in transportation planning to ensure that designs effectively address the mobility and accessibility needs of various groups, especially individuals with disabilities.
- Section 4.1.1 of the Equity report discusses "differences in terms of distribution of benefits (i.e., increased access) between equity priority communities living in the study area and their non-equity priority counterparts". Section 8 (Synopsis and Next Steps) states: "To address this, the Program is working closely with C-TRAN to optimize the transit network and create convenient bus connections from the Evergreen Station to surrounding racially diverse neighborhoods." In this section, also state that the Program should work with the City to optimize the active transportation networks and connections to bus stops and the light rail stations as a means for increasing regional transit access to jobs among equity priority communities.
- In Section 4.4 of the Equity report (Tribal Consultation), describe the level of engagement with Tribal governments and summarize the potential benefits and impacts to tribes, based on IBR's consultation.
    - Acknowledge the long-standing impact the existing bridge and freeway has had on spaces that were once occupied by indigenous populations.
    - Consistent with CBAG's potential recommendation, collaborate with tribal governments and property owners with the goal of maintaining access to the river throughout construction.
- Section 5.1.1 of the Equity report finds that "construction of the Modified LPA would likely affect houseless individuals and families living in the IBR Program area during construction." Section 7.2.2 includes the Program-Specific Mitigation to "coordinate with local jurisdictions and other organizations offering services to people experiencing unsheltered houselessness in areas directly affected by construction activities. Services would be provided in advance of construction and could include harm reduction, access to health services, and emergency shelter or alternate housing options." To strengthen the proposed mitigation, consider the following potential recommendations from the CBAG:

- Develop comprehensive strategies and funding options with the program and other partners that can be implemented to address the relocation and housing needs of people experiencing unsheltered homelessness affected by the program.
- Explore partnerships with agencies providing culturally specific services focused on equity priority communities and those who conduct street outreach and engagement for housing placement.

3.06 Public Services and Utilities (Public Services and Utilities Technical Rpts.)

- The City of Vancouver owns stormwater conveyance and outfall facilities within the program area, but the Utilities chapter does not list them as critical facilities that could be potentially disrupted by the program.
  - Describe the City of Vancouver's stormwater facilities in the Utility report.
  - Analyze and discuss the potential disruption to City stormwater facilities during construction.
  - Relocate or retain all existing stormwater connections prior to any downstream conveyance modifications, removal or disruptions to avoid flooding.
- Clarify the process for obtaining review and approval from Vancouver Fire Department (VFD) as part of bridge and roadway design, and ensure VFD and Vancouver Police Department (VPD) in all stages of Program design and implementation.
- The Utilities report contains multiple statements that fire flow on both sides of the river will be disrupted. It also states that "Loss of the main could affect water supplies and fire flows." This is not entirely accurate as the loss of the main would absolutely affect water supply and fire flow. Loss of the main in all areas listed is not an option. Whether short-term or long-term, where any modifications to water mains is planned, careful coordination with VFD and PF&R will be critical, and temporary provisions to accommodate fire flow may be required. Maintenance of flows is particularly important in the future, since as noted in the energy and air quality analyses, use of electric vehicles is expected to increase and the volume of water required to control an electric vehicle fire is exponentially larger due to the nature of battery fires. Therefore, the Final SEIS should acknowledge the potential impact and include the following mitigation measures:
  - Phase construction to avoid interruptions to fire flow to the extent possible.
  - Coordinate with VFD to develop a plan for ensuring fire flow is maintained throughout construction, using temporary provisions as needed. Temporary provisions may entail temporary above ground hard piping, storage water, and/or fire pumps.

    - If temporary disruptions in fire flows is unavoidable, provide additional details on the anticipated locations and durations to VFD and Portland's Fire and Rescue as soon as that information is available.
- In responding to emergencies, VFD finds that emergency rooms are frequently at capacity and travel across the Columbia River is required. Therefore, any street closures, even during off business hours, must be coordinated with emergency service providers (fire, police, ambulance services, and the 911 call center). To ensure that emergency access is maintained through construction, refine the Program-specific mitigation measures for temporary effects to public services to include the following details:
    - Notify emergency service providers of any planned closures of lanes, stacking of traffic, or other potential delays for fire response and medical transport across the Columbia River.
    - Clearly identify any alternate routes in communications with emergency service providers.
    - Consider reserving a lane strictly for emergency use only.
- It will be critical for the VPD to be able to access construction zones in response to calls for police services. Construction zones will change frequently and will contain hazardous materials and equipment. To avoid interruptions to emergency service, include the following mitigation measures:
    - Communicate regularly with VPD about access points to construction zones.
    - Clearly mark explosives and other hazards within construction zones so that they are visible in the event VPD needs to access the site in an emergency.
- Confirm that utilities extending beneath I-5 along Columbia Way and 5th Street would not be temporarily affected by construction.

3.07 Parks and Recreation (Parks and Recreation Technical Rpt.)

- Ensure that all parks used during construction or permanently affected by the program are, at a minimum, returned to the state they were in or better (per City standards) when construction commenced.
- Plant replacement trees in parks as soon as possible (i.e. prior to construction and when the remaining construction will not damage them).
- Ensure the survival or replacement of the new trees for at least 10 years following planting.
- Incorporate the potential CBAG recommendation to maintain green space within the project alignment and compensate for lost green space by creating or enhancing green spaces in underserved areas.

3.08 Cultural Resources (Historic Built Environment Technical Rpt., Section 106 Rpt.)

- The City supports and reiterates all comments and proposed additions, edits, refinements relative to the Vancouver National Historic Reserve submitted by The Historic Trust (see Attachment A). Of particular note is the need to immediately work with the City and stakeholders to begin a process of defining agreed upon mitigations for impacts to the Post Hospital.
- Area of Potential Effect (APE)
    - Incorporate the APE boundary on interactive project map on the Section 106 portion of IBR website.
    - The City maintains that there may be proposed changes to the boundary of the APE and/or consideration of potential impacts and associated mitigations to properties adjacent to the APE. The process to determine effects with any potential boundary changes to the APE must be laid out in a Programmatic Agreement (PA).
    - In consultation with the City, other consulting partners, and the community, develop a plan to define and implement mitigations related to The Post Hospital.
- Where there are identified adverse impacts to Historic buildings, the City advocates there be, at a minimum, replacement of windows, installation of HVAC systems, dust mitigation such as watering trees and landscape areas, to address anticipated noise, vibration, and air quality impacts due to IBR Program construction.
- Prior to completion of the IBR Program's next round of financial and risk analysis and subsequent cost estimate, the City requests that there be coordination among WSDOT, Oregon Department of Transportation (ODOT), and consulting partners to create a process to define: 1) current Section 106 cost estimates, and 2) a minimum set aside of funding for Section 106 mitigations.
- Define, in a Programmatic Agreement, tangible capital and programmatic elements that proactively draw attention to the area so that understanding of the historical and cultural significance expands. Examples of this include more visibly prominent elements that will be relevant and accessible for several generations.
- Continue collaboration with program partners to define physical and programmatic mitigations and benefits through a Programmatic Agreement.
- Support the City in acquiring archaeological support staff.

3.09 Visual Quality (Visual Quality Technical Report)

- Early in the report, clarify how the IBR program will make design decisions and the roles of local agencies and the public in this process to provide a consistent baseline upon which all visual findings can be justified. Emphasize the need for consistency with local design standards. Refer back to this description where applicable.
- In section 7.1.2.1 (Mitigation Common to All Landscape Units), clarify that IBR will conduct public engagement to inform the final design of program elements that go beyond freeway specifications. Engagement will include but not be limited to in-

person workshops. IBR will coordinate with the cities to develop and implement outreach and engagement.

- Acknowledge the potential tension between local standards and a uniform theme for the Program, given that two cities and two states are involved. The final design should seek to balance the goals for context-sensitivity and a consistent, unifying theme that reflects regional collaboration.
- Remove reference to the Vancouver Design Review Committee (which no longer exists) and replace with City of Vancouver community development staff.
- In addition to station areas, include in the program-specific mitigation applicable to all landscape units:
    - Use CPTED principles in the design and lighting of underpass areas, overpasses, and any other area that is publicly accessible by foot.
    - Seek to balance the objectives of lighting (which can sometimes be at odds with each other): provide safety and security at night for transit operators and users of public spaces, avoid impacts to wildlife and ecosystems, and avoid excessive or obtrusive light and glare at adjacent land uses.
    - Coordinate lighting design and volume (lumens) with City and WSDOT standards.
- The Visual Quality report finds that the Modified LPA replace and restore landscaping in the program footprint, but that "this new landscaping would not substantially replace visual elements associated with mature trees for many years" and therefore "vegetation removal would be considered a long-term impact." As mitigation, explore opportunities to plant more mature trees to accelerate the restoration process (consistent with CBAG recommendations).
- In the program-specific mitigation for visual quality impacts, incorporate the desired design outcomes found in Attachments B (City of Vancouver Desired Outcomes) and E (Guiding Principles for the Community Connector and Evergreen Station Area).
- Include the following measures related to park and rides: utilize thoughtful urban design to maintain the human scale and pedestrian friendly feel of downtown Vancouver. Avoid hindering access for walking, biking, small mobility devices, bus, paratransit, and other alternative forms of mobility.
- Clarify that the IBR team will be responsible for the relocation of the Boat of Discovery art installation in collaboration with the art owner, City staff, and Port of Vancouver staff (refer to Page 4-34).
- Consider and incorporate the following affirmed and potential recommendations from the CBAG:
    - Create designs that prioritize preservation and enhancement of natural features, focusing on the views both from and towards the bridge while working within the constraints of the bridge structure to maintain structural integrity and safety.

    - Include viewpoints or designated areas for cyclists and pedestrians on the bridge to enhance their experience and safety.
    - Integrate art and local history and culture into the bridges and program area designs, at various scales, to enhance its aesthetic appeal and connection to the community.
    - Create a distinct and iconic bridge.
    - Consider design with an eye toward ice and other severe weather conditions.
    - Include accountability to ensure that various contractors are adhering to the aesthetic and design specifications to create consistent design throughout the program area.
    - Consider functionality in the design to create a space that builds community and connection.
    - Incorporate desirable design elements in a consistent manner throughout the program area, such as textured acoustic walls and articulated bridge columns, ensuring both large- and small-scale aesthetic and functional details.
    - Include rich landscaping of plants and flowers that will both beautify the space and make it a desirable destination.
- Acknowledge that parking structures would likely be seen an adverse visual change to the cultural or project environment in Downtown Vancouver (even with a thoughtful process that complies with the City's design standards and guidelines and involves the community).
- To address concerns by residents of the Esther Short neighborhood near I-5, clarify the changes to views from Smith Tower and other buildings that currently have views of the river.
- Add more photosimulations and key viewpoints in the entire program area within Vancouver for all design options for greater visual representation of potential opportunities and impacts.
- Residents of neighborhoods close to the freeway are concerned about the visual impact of new and reconstructed noise walls. Staff supports the following mitigations, based on recommendations from the Arnada Neighborhood Association, CBAG, and City of Vancouver Parks and Recreation Advisory Commission.
    - Provide the highest standard anti-graffiti coating available at the time of its construction. Ensure funding for graffiti removal for at least 25 years from date of completion.
    - Work with the City, neighborhood associations, and community in general to develop the final designs for the sound walls.
    - Design walls to be aesthetically pleasing.

3.10 Air Quality (Air Quality Technical Report)

- Include more information about the health impacts of transportation-related pollution. Specifically, transportation is a significant contributor to air pollution-related illnesses and premature death. Emissions from vehicles can lead to respiratory, cardiovascular, neurodegenerative, and metabolic diseases, as well as cancer and reproductive issues.
- The Draft SEIS assumes significant decreases in traffic-related pollution due to federal regulations on fuels and vehicle efficiency. Furthermore, the air quality analysis is based on regional data and refers to a small number of existing monitoring sites in Vancouver. Explain how IBR will monitor air quality to ensure consistency with this finding for the program area over the long-term, and how IBR would mitigate emissions, if monitoring indicates that air quality in the program does not improve to the expected levels by 2045. Clarify the plan to mitigate long-term air pollution from highway traffic in that event.
- Table 3-8 in the Air Quality report lists sensitive receptors near the program footprint. All 16 are located in Vancouver, including hospitals, schools, and assisted living facilities. Additional analysis is needed to understand the exposure to mobile source air toxics under the future scenarios and to identify measures that would reduce potential health impacts due to freeway pollution. This may include installing monitoring stations for toxic air contaminants at sensitive receptors in Vancouver.
- Update the analysis to address the following City of Vancouver Condition of Approval: Active transportation facilities shall be designed to minimize users' exposure to roadway pollutants such as particulate matter and hazardous chemical compounds.
    - Install monitoring stations along pathways and parks located along the freeway, so people can understand the health hazards of exposure to unfiltered freeway air.
- Add a more explicit disclaimer that Motor Vehicle Emissions Simulator (MOVES) calculates emissions, not air concentrations that can be compared to health benchmarks or standards. It follows that if emissions go down, so do air concentrations, but it is not necessarily a 1:1 correlation.
- Provide additional analysis of construction-related air quality impacts to residents living within or near the program area, acknowledging that this population is already exposed to higher pollution from the freeway. It is not adequate to exclusively use the Dan Ryan Expressway as a proxy; analyze the specifics of the program area's context.
- Clarify the specific temporary impacts anticipated for the large construction staging areas and for each of the design options.

- In Section 7.2.2 of the Air Quality report, change the program-specific mitigation from “encourage” to “require” to ensure that contractors minimize impacts to surrounding communities.
- Evaluate and consider the following recommendations related to air quality provided in the Executive Summary of the IBR Health Analysis (Attachment F):
    - Improve greenspace and tree canopy cover to improve air and water quality, provide shade, and increase natural spaces.
    - Meet and exceed, where possible, state and local requirements to reduce noise and air pollution to protect the health of workers and community members.
    - Protect workers and community members on high-risk days for high heat and poor air quality events.
    - 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.
    - Expand information about potential air quality, safety, and connectivity impacts of construction.
    - Compile and release to the public additional information about potential air quality, safety, and connectivity impacts of tolling-related traffic diversion through neighborhoods.
- Ensure the final design improves flow of traffic to minimize congestion and environmental impacts of idling.
- Denote Vancouver's Climate Action Framework in the Final EIS as further evidence of strong political support for climate action and established citywide policies to address the impacts of climate change.

3.11 Noise & Vibration (Noise & Vibration Technical Rpt.)

- The City supports proposed mitigation measures, including installation of sound walls along the freeway to reduce impacts to the extent practical. Design and construct with as minimal impact to buildings as possible.
- The Noise and Vibration report finds that “traffic noise levels would approach or exceed the NAC at one office and an outdoor use area at the Vancouver Community Library” and that noise mitigation at this site is not feasible because the residential equivalent use at this site was calculated as one residence while WSDOT feasibility requires a minimum of three first row impacted receivers to benefit from a noise wall. The parking lot and vacant parcels adjacent to the Library are owned by the City and this site is referred to as “Library Square.” The plan is to develop this site with high density uses and to complement the adjacent light rail station at Evergreen Boulevard and the Community Connector. One objective of the Connector is to buffer the negative impacts of the freeway, including traffic noise.

    - Analyze the potential for the Community Connector to reduce noise levels at the library and future residential uses on the Library Square site.
    - Identify other potential measures that could reduce noise levels at this location, for consideration as plans for Library Square progress.
- Residents living along the freeway in Vancouver are concerned about the potential impacts to their homes from construction vibration, which is discussed in Sections 5.1.2 and 7.9.2.1 of the Noise and Vibration report. The Draft SEIS analysis is based on US DOT guidelines, which recommends the maximum peak particle velocity (PPV) levels remain below 0.5 inches per second at the nearest structures. The Draft SEIS finds that vibration associated with certain activities could reach this threshold within 100 feet of sensitive receivers, and that there is the potential for vibration damage to "fragile buildings and structures" at levels less than 0.5 in/sec PPV. The discussion of contractor requirements in section 5.1.2.1 does not match the regulatory requirements in section 7.9.2.1, and the potential impact may not be fully mitigated by the requirement to monitor.
    - Confirm regulatory requirements for fragile buildings and structures and align the discussions in sections 5.1.2.1 and 7.9.2.1.
    - Clarify what would happen if monitoring finds that construction is exceeding the thresholds or if vibration causes architectural or structural damage.
    - Refer to comments in Cultural and Section 106 sections for additional comments on potential impact to historic structures.
- The Noise and Vibration Report finds that "shared-use path users would have more exposure to noise from highway vehicles [under the single-level bridge configuration] than with the [double deck option] due to reduced shielding between the shared-use path and highway traffic.
    - Include program-specific mitigations to address this impact, consistent with the CBAG recommendation to reduce highway noise for all bridge users, including pedestrians and cyclists.
- Evaluate and consider the following noise-related recommendations provided in the Executive Summary of the IBR Health Analysis (Attachment F):
    - Meet and exceed, where possible, state and local requirements to reduce noise and air pollution to protect the health of workers and community members.
    - 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.

3.12 Energy (Energy Technical Rpt.)

- The analysis of construction-related effects is based on one set of assumptions related to construction materials and equipment. Section 7.2.2 (Program-Specific Mitigation) includes: "Continue to consider advances in energy-reducing and/or

energy-saving materials and methods." Provide data on the differences in energy consumption and greenhouse gas (GHG) emissions between the various materials and equipment that could be used, to inform decision-making about which materials and methods to advance.

- Coordinate with the City's Electric Vehicle (EV) Infrastructure Strategy to further incentive EV use through IBR's mitigation and community benefits. This is consistent with CBAG's recommendation to: "Incentivize the installation of electric charging stations in the construction zone for contractor use to meet EV requirements. These charging stations are to be placed so that they may become convenient public facilities after construction is complete and ongoing operations and ownership is determined."

3.13 Electric and Magnetic Fields (Electric and Magnetic Fields Technical Rpt.)

Staff does not have any comments on this chapter/report.

3.14 Water Quality and Hydrology (Water Quality and Hydrology Technical Rpt.)

- The City of Vancouver has over 400 acres of impervious surfaces that drain into the I-5 corridor to existing WSDOT stormwater facilities that outfall to the Columbia River. The Water Quality and Hydrology chapter mentions the contributions to the stormwater system from the program area; however, it does not recognize contributions from outside of the program area.
    - Delineate the outside contributing area from City of Vancouver to the existing WSDOT conveyance facilities. The City can provide additional GIS or other data to assist in this delineation.
    - Ensure that any stormwater conveyance or treatment facilities that will be constructed or replaced by the program are sized to accommodate the total volume of anticipated flows, including flows from inside and outside of the project area.
- The Water Quality and Hydrology chapter states that infiltration is the preferred option for stormwater runoff mitigation; however, infiltration rates in the area may not be sufficient to infiltrate all stormwater from the project and outside contributing areas. Infiltration of the project runoff will also require close adherence to Vancouver Municipal Code 14.26 – Water Resources Protection Ordinance to ensure that groundwater is protected from potentially mobilized contaminants. If infiltration is proposed, a Critical Aquifer Recharge Area (CARA) technical report may be required.
    - Provide a CARA technical report outlining how infiltration within the project area will not negatively impact the underlying aquifer once stormwater design has progressed to detailed design.

3.15 Wetlands (Wetlands Technical Rpt.)

- See Attachment D for administrative comments on this chapter.

3.16 Ecosystems (Ecosystems Technical Rpt.)

- The City's Urban Forestry Management Plan (UFMP) recommends direction and actions for Vancouver to optimize the benefits of trees by envisioning an equitable, climate adaptive, integrated, and sustainable approach to managing the city's urban forest resources over the next twenty-five years. Action 3.1D.9 states: "utilize long-lived, large form, drought-tolerant, climate-resilient native planting and retention of mature trees". Action 1.3C.10 and 12 addresses removing and controlling invasive species on public properties. The City's Climate Action Framework (CAF) is a blueprint to reduce greenhouse gas emission and build resiliency to climate change impacts. CAF Strategy NS-1, states to increase carbon storage in trees, vegetation and soil. Accordingly, the Climate and Ecosystems chapters should include the following measures:
    - Continue to work with City staff to design program elements in support of the City's Climate Action Framework and Urban Forestry Management Plan.
    - IBR contractors should eradicate invasive species prior to and during construction in the program footprint, such as English ivy, Tree of Heaven, Black Locusts and blackberry.
    - Utilize native, climate adaptive vegetation, long-lived, large form, and drought-tolerant, trees in new landscape areas.
    - Incorporate native or climate adaptive conifers to reflect the gateway to the Evergreen State.
- Explore opportunities to plant replacement trees in the program area as soon as possible (pre-completion) so that those trees can begin to establish and provide the intended mitigation.
- Explore partnerships with landscaping and naturescaping groups to rehome trees that can't be saved.
- Consider use of pollinator practices in the new landscaping.

3.17 Geology and Groundwater (Geology and Groundwater Technical Rpt.)

- The Geology and Groundwater chapter implies that the City of Vancouver Safe Drinking Water Act (SDWA) monitoring is a characteristic assessment of groundwater quality. This is misleading because shallow groundwater monitoring data indicate contamination of groundwater due to the infiltration of personal care products, ineffective septic systems, and polluted runoff. Infiltration in the program area at the proposed scope and scale will likely impact both shallow and deep hydrogeology, potentially mobilizing contaminants to travel towards drinking water sources in new ways. Furthermore, the DSEIS states that the City is meeting SDWA standards, but the City has recently violated SDWA standards for per- and polyfluoroalkyl substances (PFAS) at several sources and for different analytes. The City is implementing treatment systems to address the violations, but the sources

of our drinking water are not pristine. Accordingly, the City's Strategic Plan includes this goal and strategy: "To ensure Vancouver's drinking water is safe for the community, the public works department will monitor PFAS concentrations and invest in treatment systems that reduce PFAS in drinking water in order to meet federal drinking water regulations and reduce the concentration of PFAS in drinking water by the end of 2028." Developing new sources of drinking water that are shallower and more abundant will mean more vulnerability to shallow infiltration of pollution, particularly persistent compounds like PFAS, as well as potential shifts in groundwater flow regimes.

    - Update the analysis to reflect the potential for the construction of the Modified LPA and long-term operations to contaminate drinking water sources and modify groundwater patterns.
        - Analyze the localized effects to supply wells in the area not just the City of Vancouver for the short-term and long-term. Use publicly available data to model various scenarios of infiltration rates.
        - Mitigate any potential contamination to meet applicable standards.
- The DSEIS states "there is no evidence of notable erosion or landslides in the study area." However, the Clark County maps show "severe erosion risk areas" and slopes exceeding 25% in the vicinity of the I-5/SR-500 interchange (see Attachment H).
    - Update the analysis to reflect the County's maps on soil and landslide hazards, analyzing the potential impacts from construction and operation of the Modified LPA.

3.18 Hazardous Materials (Hazardous Materials Technical Rpt.)

- Consider smoke management in the selection of the bridge configuration and subsequent design phases, maintain fire-fighting water supply and emergency vehicle access throughout construction, and enable VPD access to construction zones if needed. Closed-truss construction would require smoke management, while open-truss construction on a lower deck creates limited emergency access conditions. The National Fire Protection Association (NFPA) issues standards for addressing these issues.
    - Design the new bridged to comply with NFPA 502: Standard for Road Tunnels, Bridges, and Other Limited Access Highways, including but not limited to the standards listed in Attachment D (Administrative Staff Comments).

3.19 Climate Change (Climate Change Technical Rpt.)

- City staff appreciates the IBR program's focus on climate resiliency and mitigation overall. The Draft SEIS shows how the Modified LPA aims to mitigate transportation-related emissions with strategies to reduce vehicle miles

traveled, enhance multimodal transportation options, and shift trips to clean, non-polluting sources. This reinforces several of the City's Desired Outcomes and Conditions of Approval for the Modified LPA (see Attachment B). Staff also appreciates the references to the City's Climate Action Framework, which established the following targets:
    - 80% reduction in GHG by municipal operations by 2025
    - 80% reduction in GHG emissions by the Vancouver community by 2030
    - Carbon neutrality by both municipal operations and the Vancouver community by 2040
- In Section 3.19.1 of the Climate chapter (Changes or New Information Since 2013):
    - update the reference to Vancouver's Climate Action Framework to also note the interim goal of 80% reduction in communitywide emissions by 2030.
    - include mentions of the City of Vancouver's 2024 – 2044 Transportation System Plan (TSP) and the 2023-29 Vancouver Strategic Plan.
- Update the introduction to the Climate chapter to clarify the human-caused origins of GHG emissions and the connection between fossil fuel combustion in automobiles and freight, as well as high-energy intensity building materials like steel and concrete. This will set the context for the project's contribution to climate change and the mitigation efforts that must be made.
- As noted in Table 8-1 of the Climate Report, the City made Conditions of Approval to define a GHG reduction target, monitor GHG emissions, and provide regular reports on the status of GHG mitigation efforts.
    - Establish an ongoing program to monitor volume of vehicles and active transportation modes across the bridge and report results annually to Metro and RTC for inclusion in transportation and air quality modeling.
    - Reserve funding for a long-term (10-year) research project, to be conducted by a local college or university in Oregon or Washington (such as the Transportation Research and Education Center (TREC) or National Institute for Transportation and Communities (NITC) programs at Portland State University). This research would evaluate how the modeled outcomes for GHG and other air pollutants compare to actual observed results over time. The ultimate goal would be to publish the findings in a peer-reviewed journal and present them at a national conference, such as the Transportation Research Board (TRB) Annual Meeting, exploring any factors contributing to significant discrepancies between the modeled and observed outcomes.
- Include wildfire smoke's impact on traffic visibility as a climatic factor.
- Discuss impacts to construction workers due to extreme weather events.

- Consider and incorporate into the mitigation the following CBAG recommendation: use material options that are sustainable and environmentally friendly (balancing decisions to use low carbon materials, costs, and life of materials) into the program design, including local elements (examples include ash and shells). Consider other emissions as well.

3.20 Environmental Justice

- The discussion on noise and vibration impacts in the Environmental Justice (EJ) report is inconsistent with the Noise and Vibration report with respect to Vancouver's three neighborhoods that meet EJ thresholds (Esther Short, Arnada, and Rose Village). It incorrectly states that there would be a substantial noise impact in Rose Village. Based on the Noise Report, the substantial impact would be west of the freeway in the Shumway neighborhood.
    - Update Sections 4.6 and 7.1.1.2 and Table 4-3 in the EJ report to align the findings with the Noise and Vibration report and to summarize the effects on EJ populations in Washington neighborhoods (i.e., traffic noise impacts and recommended noise walls in all three EJ areas, as well as impacts from light rail noise and vibration in Esther Short, with associated mitigation).
- The EJ analysis is focused on the three Vancouver neighborhoods that have high concentrations of EJ populations relative to the region. This approach overlooks EJ populations living in other neighborhoods within Vancouver. It also assumes an even distribution across the neighborhood or block group, which overlook possible concentrations of EJ populations within that area and can lead to the inaccurate conclusion that effects on EJ populations are the same as the general population. There is particular concern about underestimating impacts to lower-income people living adjacent to the freeway (where it is likely that property values are lower and housing is less expensive). The "No Thresholds" approach described in Section 2.6.6.1 is intended to account for this limitation in the quantitative approach. For example, section 2.6.6.1 states that "a community-based organization or social service group that primarily serves EJ populations may exist within a neighborhood that otherwise has a low proportion of low-income and minority residents". Given that people seek out and access resources and opportunities outside of their neighborhoods, the analysis of impacts to community resources should look beyond those located in EJ areas. However, the EJ report only describes the "No Thresholds" approach in the Methods section and does not specify which impacts use this approach, nor apply it to all impacts where it would be most suitable.
    - Use the "No Thresholds" approach to analyze impacts that span a larger geographic scale than EJ neighborhoods (tolling, indirect displacement, and community resources). The study areas should include: the entire catchment area for people that would normally take I-5 to cross the river to evaluate tolling impacts, block groups that are within a 15-minute bike or

bus ride to evaluate the potential for indirect displacement, and the secondary EJ study area to evaluate impacts to community resources.
    - Use the "No Thresholds" approach to analyze impacts at a small geographic scale than the neighborhood (acquisitions, traffic noise, and construction-related impacts). A No Thresholds approach could lead to the finding of disproportionately high and adverse impacts to EJ populations living along the freeway, particularly for full acquisitions/displacements, traffic noise that is not mitigated, and construction-related noise and air quality effects. EJ populations and other sensitive populations living near the freeway are already disproportionately impacted by noise and air pollution.
    - Include mitigation measures to reduce and avoid impacts to EJ populations, based on updated findings using the "No Thresholds" approach. Ensure these communities are not disproportionately impacted by construction activities.
- Section 7.2.2 of the EJ report states that "interruptions to traffic, bus, light-rail service, and cross-river bicycle and pedestrian facilities would result in a disproportionately high and adverse effect on EJ populations" and that "disruptions to peak period and daytime travel on I-5 are proposed to be mitigated through construction best practices, such as scheduling construction activities during nighttime hours and on weekends with approval by ODOT and/or WSDOT." This measure can have the unintended consequence of disproportionately affecting shift workers that need to travel on nights and weekends. Studies indicate that women and people of color are more likely to work night shifts in US manufacturing jobs. This concern reinforces the Equity Advisory Group (EAG) recommendation to "consider the disproportionate impacts that congestion can have on people working long hours or multiple shifts, workers who often must adhere to strict shift schedules, and parents—particularly single parents" (Section 4.3.2 of the Equity Report).
    - Analyze the potential effects of nighttime and weekend closures of transportation facilities on shift workers.
    - Identify large employers in the secondary study area that utilize shift work to understand employee needs.
    - During construction, inform employers and workers of significant traffic pattern changes.
    - In addition to the proposed mitigation, consider offering free rides by transit across the river when the shared use path on the bridge is fully closed.
- In the EJ report, describe the participation of Tribal governments in the identification and mitigation of archaeological resources.
- The EJ and Equity reports note several times how equity priority communities have a greater reliance on modes besides driving. Therefore, under the No-Build Alternative, EJ populations and other equity priority communities would experience

disproportionate impacts resulting from the insufficiencies in the transportation system that will only get worse over time. This includes issues with transit access, frequency, reliability, and travel times, as well as the safety and connectivity of the active transportation network.
    - Update the finding for the No-Build Alternative in the long-term effects section of the EJ report to acknowledge the disproportionately high and adverse effect on EJ populations of that scenario.
- Tolling: There is broad concern about the equity impacts of the tolling program as discussed in section 5.2 of the Equity Report and 4.7 of the EJ report. One of the City Desired Outcomes is to "Implement tolling in an equitable manner that includes mitigation programs."
    - Advocate to the Bi-state Tolling Subcommittee and Transportation Commissions to implement a low-income toll program when tolling begins on the existing bridge.
    - Encourage them to consider a discount program for people with a disability or chronic illness.
    - Offer technical assistance and multilingual support to help enroll qualified people into the low-income tolling program.
- Section 6.2 of the EJ report states: "Even if low-income renters faced adverse effects, it is not clear that such effects would be disproportionate, as rising rent levels can also displace middle income earners. Renters as a group typically move with some regularity…" Staff disagrees with these statements. The tolling analysis acknowledges that increases in transportation costs as a share of household income have a disproportionate impact on low-income populations. Given that housing costs make up the largest share of household costs (followed by transportation), the same premise would apply here. Increases in rent would have a disproportionate effect on lower-income renters. The point about renters moving with some regularity is in part because of their financial vulnerabilities to market conditions - it should not be used to justify a finding of no disproportionate impact. While "the vast majority of affordable rental properties in Vancouver would not experience indirect effects from the Modified LPA", it could also affect housing prices along the Vine routes due to the high frequency, direct connections to the light rail stations, which would affect EJ populations in neighborhoods along the routes. In Section 6.2:
    - Acknowledge the potential for the Modified LPA to contribute to increased housing prices and rents in Vancouver – particularly areas within a 15-minute walk, bike, or bus ride to the light rail stations, recognizing that many factors influence housing prices and it would not be possible to quantify the exact contribution from the program.
    - Acknowledge the disproportionately high and adverse impact that would occur to EJ populations due to increased housing prices resulting at least in part from the Modified LPA.

    - Elaborate on the other City and regional programs for increasing the supply of affordable housing and for supporting renters vulnerable to displacement, such as the City's Affordable Housing Fund.
    - As mitigation, explore and implement anti-displacement and community stabilization measures, building upon the City of Vancouver's equitable development and anti-displacement policies, strategies, and community engagement models.
- The EJ report includes an extensive description of the Program's community engagement activities completed since 2020. Ongoing outreach and engagement will be critical to meeting the Program's equity goals and commitments, as well as the City's Desired Outcomes and Conditions of Approval related to equity and community engagement, such as prioritizing "historically marginalized and underserved communities within Program area to establish objectives, design, implement and evaluation of success of project".
    - In Section 2.5.2.1, describe how successful engagement activities were in reaching EJ communities. Provide a demographic breakdown of participants where possible.
    - Continue to work with equity priorities communities to amplify potential benefits, understand potential impacts, and define possible mitigations and community benefits.
    - Focus on providing clear, accessible, and transparent communication and culturally specific engagement.

3.21 Section 6(f) and Federal Lands to Parks (FLP)

- Continue consultation with NPS and the City to discuss mitigations relative to potential FLP impacts at Marshall Park and Old Apple Tree Park.

3.22 Aviation (Aviation Technical Report)

- The City has been working with IBR and the Federal Aviation Administration (FAA) to develop conceptual plans intended to minimize impacts to aviation operations of Pearson Field, given the constraints and trade-offs. Staff supports the Modified LPA and agrees with the Draft SEIS findings and proposed mitigation measures in the Draft SEIS. However, there is concern about the height of construction cranes and potential penetration of air space during construction.
    - Clarify in the program-specific mitigation measure the intent to communicate with the pilots at Pearson Field about the timing and duration of construction activity that will impact flight patterns – in addition to FAA's practice of issuing "Notice to Air Missions".
    - Continue to collaborate with staff and aviation stakeholders to define any necessary mitigations.

3.23 Cumulative Effects (Cumulative Technical Rpt.)

- In Section 2.5 of the Cumulative Effects report, call out and summarize the Main Street Promise, Fourth Plain Boulevard and Fort Vancouver Way Safety and Mobility Project, and 29th and 33rd Streets Safety and Mobility Project (see Attachment I for additional information). While the Main Street project is incorporated in the Regional Transportation Plan (RTP), it should be described in this section explicitly to provide context for its mentions later in the report.
    - Clarify how these projects would relate to the IBR program.
    - Continue to coordinate with City staff and design the IBR program elements to tie into these improvements.
- The analysis of temporary effects in the Cumulative Effects report finds that "If construction of future projects does occur simultaneously with IBR Program–related construction, adverse cumulative effects would be temporary and minimized through construction coordination between ODOT, WSDOT, and other agencies." Staff concurs that coordination will be essential to minimizing cumulative effects. It will be important for the IBR program to have up-to-date construction timelines for the approved development and transportation projects listed in the Cumulative Effects and Land Use reports.
    - Prior to finalizing construction plans for each phase, confirm the construction timelines for the approved development and transportation projects listed in the Cumulative Effects and Land Use reports.
    - Coordinate traffic control plans, business assistance strategies, emergency response plans, and other construction management tools with City staff.
    - Notify emergency service providers of any street and freeway closures, even during off business hours. Identify any detours or short-term alternate routes, particularly for routes serving hospitals, senior living facilities, and other locations with relatively high needs.
- Maximize workforce development opportunities including but not limited to apprenticeships and pre-construction education and recruitment with emphasis on equitable outcomes for historically disadvantaged communities.

Chapter 4 – Draft Section 4(f) Evaluation

Based on the section 4(f) determination criteria, the de minimus impact finding for Old Apple Tree Park is acceptable to City staff, with the following measures:

- Keep the park open during construction.
- Confine construction to the western and northern portion of the park.
- Continue discussions with City staff about the permanent alignment of the shared use path from Main Street, the connections to existing paths, and the overall park footprint. Ensure that the Final SEIS provides enough flexibility for the new path's

alignment, while providing the environmental clearance to move forward into final design and construction.
- Minimize any tree root impact with the path and all construction.

Based on the section 4(f) determination criteria, the de minimus impact finding for Marshall Park is acceptable to City staff, with the following measures:

- Keep the park open during construction.
- Continue discussions with City staff about the mitigation for permanent impacts, including a recreational feature as potential replacement for the impact to the horseshoe pits, as agreed to by the City.
- Ensure that the Mayor's Grove trees are adequately protected and/or mitigated in consultation with City.

Design Options

This section summarizes City staff's current position on Design Options, based on the analysis provided in the Draft SEIS and additional information for purposes of putting in the record.

Westward Shift

- The Draft SEIS describes additional acquisition and displacement on the east side of I-5 in Downtown that would be required to shift the centerline of I-5 to the west, and possible corresponding reduction in impacts to archaeological resources on the east side. The relative benefit and avoidance of impacts to archaeological impacts are not defined in the report and, with that, the City does not support shifting the centerline of I-5 to the west.
- Clarify what changes in local planning resulted in the proposed westerly shift and what the objective of this shift is.

Park and Ride Options

- The City supports and reiterates the comments submitted by the City's Parking Advisory Committee and the City Center Redevelopment Authority (CCRA). These letters, which are included in Attachment C, reflect community concerns about the potential for park and ride structures in Downtown Vancouver.
- Continue to work with the City to define the number of park and ride spaces as soon as possible.
- Evaluate the potential to use existing parking spaces to the maximum extent possible.
    - Work with the City to develop a dispersed parking program that connects transit riders to the existing supply, building upon the Downtown Access, Mobility, and Parking Plan toolkit under development.

    - Prioritize locations that would be least impactful to the station areas and Downtown in general, while still achieving the access needs and complying with Federal Transit Administration's grant funding criteria.
    - Consider City-owned lots within the walkshed of the station areas.
- Compare 0, 1, or 2 new facilities, considering the differences between existing and new structures, below- or above-ground structures, and shared use and single use facilities.
- Provide a more detailed analysis on the potential transportation, climate, land use, economic, visual, neighborhood, and equity/environmental justice effects resulting from new, large parking structures.
    - Clarify impacts to the operations of local streets in Downtown resulting from the park and rides, especially during peak hours.
    - Discuss consistency of park and rides with Vancouver's Climate Action Framework in Table B-7 of the Climate Change report.
    - Elaborate on the alignment with City goals for Downtown to be walkable, transit-oriented, safe, and vibrant.
    - Clarify the mitigation measures in each report/chapter to address the potential for adverse impacts resulting from park and rides.
    - Work with City staff to identify and minimize potential conflicts between modes and associated safety and traffic flow issues that may arise due to the provision of park and rides facilities, if any are required.
- Consider the opportunity costs of building a new parking structure compared to using the existing parking supply to meet demand and developing another use on the park and ride sites.
- Remove the Waterfront Gateway park and ride site from further consideration.
- Lower the assumed number of parking spaces that could be accommodated on the Library Square site to reflect the City's vision for the site (pedestrian-oriented with high density development).
- Continue to work with City staff and the community to analyze the appropriate level and design of park and ride for any/all sites that may be required. Design must be high quality, human-scaled environment that prioritizes access by active transportation modes (walking, biking, etc.) and by bus and paratransit.
- The community has questions about how shared use facilities would work. For example, if park and ride lots are only for transit rides and parking there is free or reduced cost compared to other lots in the area, then people could purchase a ticket for transit but not actually take transit, providing them with cheap parking in a prime location in Downtown Vancouver and undermining the City's parking management system.
    - When developing any shared use agreements, consider how to regulate the usage of parking lots by various user groups, such as local employees and

visitors to Downtown Vancouver. This includes the pricing structure and enforcement.

- Consider the potential to expand carpooling and shuttle services from park and ride lots outside of Downtown Vancouver.
- Across all reports and chapters, ensure the descriptor of the park and ride design option reflects the potential for the Modified LPA to include up to two park and rides (rather than saying the Modified LPA will or does include two park and rides).

C Street Ramps

- The City supports retaining C Street ramp connections to I-5. The findings of the Transportation technical report show that without these connections there would be multiple adverse impacts. For example, as described in section 4.6.4.2, six intersections would fail to meet the relevant intersection performance standards under the AM or PM peak period. Congestion would impact the Mill Plain Boulevard and 15th Street couplet (a primary freight corridor), as well as transit service that operates in the downtown area. Retention of C Street ramps would enable direct access to and from Downtown and discourage cut through traffic. The placement of these ramp connections is not anticipated to result in a significant visual barrier as there will already be major structural elements associated with the westbound SR-14 to southbound I-5 ramp as well as the structure that will carry the light transit rail lines through interchange areas.
- For the "No C Street Ramps" option, provide a detailed analysis of possible mitigations for the six failing intersections. Work with the City to identify feasible mitigation efforts, if any, considering right-of-way constraints, safety factors, and other potential impacts on the surroundings. It is unclear what is meant by "the final design phase" in section 7.1.6.2 (Program-specific mitigation for the "Without C Street Ramps" option). It is important to understanding if the impacts of this option can be mitigated, prior to selecting an option for the Final SEIS; it is not acceptable to punt the selection of final mitigation to a later design phase.

Bridge Configuration

Based on the evaluation of potential impacts and benefits of bridge configurations, City staff prefers the single-level fixed span. Compared to the double deck option, the single-level option would:

- provide better access and design from a fire and life safety perspective,
- have less intrusion into Pearson Field protected airspace due to the lower maximum bridge height,
- benefit freight movement and active transportation users due to the reduced grade compared with stacked bridge option, and
- have slightly lower air quality, energy, and GHG impacts due to the reduced acceleration and braking of vehicles.

Overall, the impacts associated with the additional width of the light rail guideway and shared-use path would be incremental. Therefore, it is staff's current position that the benefits would be worth the trade-offs, particularly with the proposed mitigation.

Compared to the movable span option, the fixed span option would eliminate issues with the current lift configuration, including traffic delays, unpredictability, disruptions to transit service and active transportation trips, and associated impacts to freight and air quality. The movable span would also require higher capital and operating costs and would intrude more into Pearson Field airspace, compared to the fixed span options. As described under Navigation above, the City encourages IBR to continue advocating for a United States Coast Guard Preliminary Navigation Clearance Determination and permit to enable the fixed span.

Auxiliary Lanes

City staff supports the Modified LPA, which includes one auxiliary lane through the program area. A second auxiliary lane would only provide modest benefits in the southbound direction during the AM peak due to bottlenecks at the I-405 and I-84 interchanges. While benefits of a second auxiliary lane would be greater for the northbound direction in the PM peak period, it would require narrowing the width of the outer shoulders to minimize the width of the freeway and associated property acquisitions. The Two Auxiliary Lane option would also result in slightly higher VMT, compared to the One Auxiliary Lane option.

- Auxiliary lanes must be designed with advanced technologies and methods to reduce congestion time and length, particularly for the northbound lanes, and to do the same for potential safety improvements.
- Clarify where exactly auxiliary lanes would be implemented, including scale and length. For example, define where they might be extended beyond the Columbia River bridge crossing such as short extensions to accommodate safer access from interchange areas to I-5 mainline.
- Clarify the width of the shoulder lane under a two auxiliary lane option and how the narrower width would affect bus on shoulder service, freight movement, emergency access and incident response, and use of the shoulders for drivers that need to pull over.
- Clarify specific acquisition needs and property impacts under the single-level fixed-span and two auxiliary lane configurations with C Street Ramps and I-5 centerline.

Attachments:

A. Comments from The Historic Trust (supported by City of Vancouver)
B. City of Vancouver's Desired Outcomes and Conditions of Approval for the Modified LPA, IBR Commitments
C. Summary of feedback on the Draft SEIS from City of Vancouver Advisory Bodies and general public
    a. Comment letter from the Parking Advisory Committee
    b. Comment letter from the City Center Redevelopment Authority
D. Administrative Comments by Chapter/Report (spreadsheet)
E. Guiding principles for the Community Connector and Evergreen Station Area (updated to reflect feedback from community leaders and interested parties in August 2024)
F. Executive Summary: Health Analysis of the Interstate Bridge Replacement Program
G. Summary of feedback from people with disabilities and accessibility-oriented leaders
H. Geologic Hazard maps created from Clark County website
I. Fact Sheets for Main Street Promise, Fourth Plain Safety and Mobility Project, and 29th and 33rd Streets Safety and Mobility Project,

Attachment A: Comments from The Historic Trust (supported by City of Vancouver)

THE HISTORIC TRUST

November 18, 2024

Interstate Bridge Replacement Program
Attn: Draft SEIS Public Comment
500 Broadway, Suite 200
Vancouver, WA 98660

VIA Email: draftseis@interstatebridge.org

Dear Interstate Bridge Replacement Program staff,

Please find following the comments of The Historic Trust on the Interstate Bridge Replacement (IBR) Project Draft Supplemental Environmental Impact Statement (DSEIS) in regard to project impacts on the Vancouver National Historic Reserve Historic District (VNHR Historic District), which encompasses the Vancouver Barracks and Officers Row historic districts. The new bridge will improve regional transportation and commerce, and provide a seismically-safe river crossing which will be of benefit to the entire Interstate 5 corridor. The Trust appreciates the opportunity to participate in the DSEIS review process.

As manager of city-owned properties at the VNHR, the Trust is committed to excellent stewardship of the historic districts therein for community benefit in the present and to pass them on to the future. The Trust also recognizes the cumulative, and in many cases permanent, effects of this very large undertaking and emphasizes the imperative to work on behalf of the community for the best possible outcomes for preservation of cultural resources. The VNHR Historic District offers to the public educational, commercial, recreational, community observance, and aesthetic enjoyment opportunities. The Trust looks forward to continuing to work with City of Vancouver staff, IBR project staff, and fellow stakeholders to protect cultural resources and mitigate adverse effects by developing and implementing meaningful, cost-effective, and long-lasting measures that will preserve the irreplaceable historic buildings and spaces of the VNHR Historic District for continuing public engagement and use.

We are happy to provide additional information and answer questions. Thank you for your review and for the coming responses.

Best regards,

Temple Lentz, President/CEO
360-992-1805

Attachment A

THE HISTORIC TRUST
CELEBRATION · EDUCATION · PRESERVATION

Comments on the Interstate Bridge Replacement Project Draft Supplemental Environmental Impact Statement

November 18, 2024

Introduction

The Interstate Bridge Replacement (IBR) project will provide the region with a significantly improved and seismically-sound crossing over the Columbia River. The Historic Trust (THT) supports this important project and welcomes the opportunity to comment on the Draft Supplemental Environmental Impact Statement (DSEIS), and the coming bridge.

The primary focus of the comments will be on the City of Vancouver (COV)-owned properties as THT manages them for the City via a lease arrangement. However, the THT supports the mitigation requested by the National Park Service and values their review of Reserve archaeological impacts. THT is not commenting on the "No Build Alternative." As part of the joint management of the Vancouver National Historic Reserve, knowledgeable National Park Service staff will provide necessary archaeology-related comments through partnership with THT and a standing agreement with the COV.

The following comments address project impacts on the Vancouver National Historic Reserve Historic District (VNHRHD), which encompasses the Vancouver Barracks and Officers Row historic districts. Effects include property acquisitions and auditory, atmospheric, vibration, and visual intrusions. The Trust also recognizes the cumulative, and in many cases permanent, effects of this very large undertaking and emphasizes the logical and efficient imperative to work together with the IBR project on behalf of the community for the best possible outcomes for preservation of cultural resources.

Additionally, THT advocates strongly for enhancement of the community connector (I-5 lid) between downtown Vancouver and the VNHRHD. The connector is a crucial step to ensure the most seamless link possible between two important public areas which were connected historically and are today comprehensively used by local residents and out-of-town visitors for commerce, education, housing, recreation, and heritage tourism.

An overall concern in reviewing the DSEIS is that the maps tend to be very difficult to interpret, even when enlarged electronically. It is challenging for viewers to provide effective comments as one often cannot determine with certainty where the borders are because the lines are sometimes blurry, and the layers difficult to distinguish.

THT continues to appreciate the opportunity to comment on project planning documents and values continued collaboration with project staff and regional partners.

Mitigation for Adverse Effects

Investment of mitigation funding in standing buildings is greatly needed and will produce very publicly-visible and impactful results. Direct physical preservation is long-term and will most effectively mitigate temporary, permanent, and cumulative impacts of new bridge construction.

For the highest level of public benefits of edification, enjoyment, and engagement associated with cultural resources, mitigation for the temporary and permanent project impacts must be implemented both within and judiciously beyond the Area of Potential Effect (APE). THT proposes a group discussion with IBR staff to determine the most meaningful, cost-effective and long-lasting ways of applying mitigation funding to the buildings in the VNHR Historic District.

Comments

Section 3.7 Parks and Recreation

The acquisition of acreage to be acquired for the MLPA within the FVNHS will permanently impact the park, and by extension the larger VNHRD. An increase in noise will affect people's educational, recreational, commercial, and residential uses of the Reserve. THT supports mitigation acceptable to the National Park Service and City of Vancouver that is commensurate with the effects of construction noise, vibration, glare, changes in views, and dust, the permanent loss of land, and heightened noise levels over time from increased traffic.

Section 3.8 Cultural Resources

The following comments concern the Vancouver National Historic Reserve Historic District (WA 1357), which incorporates Vancouver Barracks Historic District (WA 1358), and Officers Row Historic District (WA 918), Washington State Patrol District Five Headquarters (WA 1148), and the Vancouver Barracks National Cemetery (WA 1319).

All versions of bridge construction plans and post-construction operation, other than the "No Build" option on which THT is not commenting, will impact the Vancouver National Historic Reserve Historic District (VNHRHD). These include temporary vibratory, audible, visual, and atmospheric effects during construction, and cumulative post-construction permanent audible, visual, and atmospheric effects from increased traffic and change of setting and viewshed. As noted in Table 3.8-7, all of these areas will experience Adverse Effects. THT is concerned about the designation of No Adverse Effect for WA 1148, the Washington State Patrol District Five Headquarters. Because of its immediate proximity to Interstate 5, vibratory and atmospheric, and increases in traffic noise will occur.

3.8.1 – Changes or New Information Since 2013
p. 3.8-4
While it is a welcome change to divide the Vancouver National Historic Reserve into multiple historic districts and a site, especially given multiple owners, additional recognition should be given in this introductory section to the many resources within each of them in terms of applying mitigation. Suggest adding this sentence between "…National Historic Site" and "Portions of the VNHR…": Each district and the site encompasses multiple resources.

3.8.2 – Existing Conditions

"Washington," page 3.8-10, second (first full) paragraph: needs to be expanded for accuracy and clarity.

Suggested edits:

Following the Oregon Treaty of 1846 which set the boundary between then-British Canada and the United States at the 49th parallel, the Hudson's Bay Company's (HBC) Fort Vancouver area came under the jurisdiction of the United States. In 1849, the U.S. Army arrived and established Camp Columbia, eventually named Vancouver Barracks, the first American military post in the Northwest. The following year, the Army surveyed boundaries for a military reservation that encompassed Fort Vancouver within its 2,560 acres. The military reserve was gradually reduced in size to the area roughly bounded today by the Columbia River to the south, the remnants of East Reserve Street, West Reserve Street/Interstate 5, and Fourth Plain Boulevard to the north.

Following the final departure of HBC operations in 1860, the reservation remained exclusively in use by the American military until the late 1940s, when surplus operations began following the conclusion of World War II. A large portion remained in use by the Army, while other sections were transferred to various other public entities, such as the Veterans Administration and the Vancouver School District. A portion in the southern part of the reserve known through archaeological testing to contain the HBC stockade area was designated in 1948 as the Fort Vancouver National Monument (FVNM) and transferred to the National Park Service. The boundaries of the FVNM were expanded in 1961 to include all of what is now the Vancouver portion of the Fort Vancouver National Historic Site (FVNHS). Ownership of Officers Row was transferred to the City of Vancouver in 1984, the Howard House in 1995, and most of the West Barracks in 2007 – all rehabilitated by the City and partners such as the Vancouver Area Development Authority and The Historic Trust. Following many decades of diminishing use, the Army completed its departure from Vancouver Barracks in 2012.

Paragraph 5, p. 3.8-11

Edits for clarification of last three lines:
The 366-acre Vancouver National Historic Reserve (VNHR) was established by the U.S. Congress in 1996, and encompassed, in terms of the current boundaries of the APE, Officers Row, FVNHS, the West Barracks (still in Army ownership at that time), Pearson Airfield, and portions of the Columbia River waterfront. Management partners designated in the legislation were the City of Vancouver, National Park Service, State of Washington, and the Army. The Army's partnership concluded in 2012 with its final departure from Vancouver Barracks.

"Washington"
p. 3.8-10

Second paragraph, line 8 reference to Kanaka Village should state that its development began in 1829 rather than 1827.

"Historic Built Environment Resources - Washington"
p. 3.8-14

Paragraph 6 - Change final sentence to "These properties, several of which contain multiple resources, are summarized…"

p. 3.8-18

Figure 3.8-3, Interstate Historic Built Environment Resources, incorrectly labels the entire southern portion of APE to the east of the freeway as Fort Vancouver National Historic Site. That area is not entirely owned by the National Park Service. Rather, it should be labeled Vancouver National Historic Reserve. An alternative term also used locally is Fort Vancouver National Site to distinguish the entirety from the smaller National Historic Site.

p. 3.8-20 Table 3.8-5

WA 1357 - VNHRHD – Incorrectly identifies period of construction as starting in 1824. The Hudson's Bay Company did not build in this area until 1829.

WA 918 - Officers Row Historic District - Incorrectly identifies period of construction as concluding in 1903. The final building dates to 1906. Description would be more correct if changed to: Historic district consisting of 21 buildings constructed by the U.S. Army for residential and administrative purposes.

WA 1358 – Description would be more correct if changed to: Historic district consisting of 23 buildings constructed by the U.S. Army.

p. 3.8-23

On Figure 3.8-4, it is very difficult to ascertain the boundary of the VNHR. Perhaps make the border a darker brown?

3.8.3 Direct Effects

"Modified LPA - Historic Built Environment Resources"

p. 3.8-27 Vancouver National Historic Reserve Historic District (WA 1357)
THT is concerned that adverse effects identified such as construction vibrations, increase of noise from construction and ongoing freeway operations will negatively impact ability to rent nearby Trust-managed residential, commercial, and event spaces, and share associated educational opportunities with the community. THT's ability to preserve and maintain the buildings and site for the community will be hampered through loss of revenue. Those buildings are primarily the NCO duplexes which are located at the upper right of each inset maps of Figure 3.8-7 on page 3.8-29.

p. 3.8-30 Figure 3.8-8 – Design Options Comparison (WA 1357)
THT is concerned that identified adverse effects on WA 1357 North and WA 1358 also shown on the map such as construction vibrations, increase of noise from construction and ongoing freeway operations will negatively impact the organization's ability to share residential, commercial, event, and open spaces and their associated educational opportunities with the community. Thus, the ability to preserve and maintain the buildings and site will be hampered through loss of rental revenue and learning opportunities will be reduced.

THT is also concerned about physical impacts to the buildings from construction location and vibrations. The Post Hospital (WA 1358) and NCO duplexes (WA 1358 and WA 1357) are constructed of unreinforced masonry. The NCO duplexes of special concern are the ones closest to the freeway – 602/604 Barnes Road and 400/402 Hatheway. All but one of the wood-frame

Officers Row buildings north of Evergreen Blvd. and west of Fort Vancouver Way (WA 1357) have unreinforced brick foundations.

All options will have the most significant impacts on properties closest to the route, including the Post Hospital, western NCO duplexes, and western Officers Row.

pp. 3.8-35 – 37 Table 3.8-9 Direct Effects of the Modified LPA on Washington Historic Built Environment Resources

WA 1357 – VNHR Historic District, WA 918-Officers Row Historic District, and WA 1358-Vancouver Barracks Historic District

Identified Adverse Effects on the Historic Reserve overall include Army roadway demolition, construction vibrations, including those from installation of tieback anchors, roadbed upgrades, temporary increase in dust from construction, permanent changes to setting affecting views, and temporary and permanent changes to noise level, and are of concern from THT's perspective and will require mitigation.

Vibration monitors must be installed to track any changes to COV-owned site buildings, and property owners must have access to all data. An agreement is needed to stipulate that the project provides complete compensation for needed repairs, and that repairs must be done to Secretary of Interior Standards for the Treatment of Historic Properties.

Sound walls will be needed to ameliorate the increases in noise levels. COV and THT must play a contributing role in determination of height and appearance. The wall must be coated by the project with the most effective graffiti deterrent product available at time of construction, and a project-funded reserve established at the COV to pay for graffiti removal for 25 years.

3.8.5 Program Planning

pp. 3.8-43 to 44 WA 918
THT is concerned that monitoring for 500 feet will not be sufficient as some of the buildings are constructed of unreinforced masonry and/or have URM foundations. Area for monitoring construction vibrations should be extended eastward to include the 1849-built Grant House, to ensure that the site's oldest building is adequately monitored and protected. Though vibration damage risk may be minimal, the building is irreplaceable and is a foundational piece of Pacific Northwest, American military, and Vancouver, Washington, history.

3.8.6 Mitigation and Programmatic Agreement

THT will continue to participate in the Programmatic Agreement development process, and urges application of mitigation not only to places and spaces within the APE, but also historic buildings that are in reasonable adjacency.

p. 3.8-44 Paragraph 4

In the second to last paragraph, third line from bottom there is something awkward. Perhaps "phased" should be phase?

WA 1357 and 1358 - Post Hospital

Though full project impacts are not yet known, it is a realistic assumption the Post Hospital will be significantly adversely affected by construction of the project. The building's extremely close proximity to project route and unreinforced masonry construction make it exceedingly likely that project vibrations will cause irreparable harm. Loss of the irreplaceable building would greatly affect the historical interpretation of the site as it is of unique design and was critical for many years to the functioning of the barracks. Loss of such a large building set prominently on a rise would also **significantly affect views** of the western border within the site and **would eliminate a noise barrier** between I-5 and the interior of the VNHR. Because the hospital is currently used by THT's maintenance crew for production of building materials for preservation on site and other maintenance tasks, an alternative location would also be needed for their work. These impacts are notable and, without proper mitigation, the adverse result is unacceptable.

Because the former hospital, however, has not been thoroughly studied and considered, informed decisions cannot yet be made about its future.

To properly evaluate the future of the Post Hospital and mitigate for adverse effects, the IBR Project must make specific reference to and inclusion of the Post Hospital in the Programmatic Agreement for mitigation of historic and cultural resources that are protected under Section 106. Specific language for that document is proposed below and will also be proposed separately as comment for that document's concurrent comment period.

To summarize:
Prior to start of construction, IBR project will fund a study to determine the potential and cost assumptions for seismic stabilization and reinforcement, rehabilitation, and re-use.

- If re-use is feasible, the study must then fund a substantial public engagement process for potential re-use.

- If the building can be successfully and feasibly seismically stabilized and rehabilitated, the project will contribute substantial funding for protection during construction, rehabilitation, and re-use.

- If the building cannot feasibly be rehabilitated, the project will mitigate its loss by funding removal of hazardous substances, deconstruction, and salvage. The project will fund a public engagement process to envision new uses of the space, and design and construction of a new building.

For use in Programmatic Agreement:

Post Hospital – Historic Building Retrofit, Rehabilitation, Salvage, or Removal

I. Seismic Retrofit and Rehabilitation Feasibility Assessment

- WSDOT and ODOT, in coordination with FHWA, FTA, City of Vancouver (COV), and The Historic Trust (THT), will hire a contractor

- to prepare the Seismic Retrofit and Rehabilitation Feasibility Assessment.
- The Seismic Retrofit and Rehabilitation Feasibility Assessment will include recommendations regarding prudence and feasibility of seismic retrofit and rehabilitation of the Post Hospital. Considerations will include but not be limited to selected Project alignment and proximity of Project during and after construction and financial feasibility.
- A delivery schedule for review and submittal of the Seismic Retrofit and Rehabilitation Feasibility Assessment will be developed in coordination with the COV and THT.
- WSDOT and ODOT will oversee implementation of the following scope of work:
  - WSDOT and ODOT, in coordination with FHWA, FTA, COV and THT, will deliver the draft Seismic Retrofit and Rehabilitation Feasibility Assessment for review by DAHP, NPS, the Tribes, and other consulting parties;
  - WSDOT and ODOT will deliver the final Feasibility Assessment to FHWA, FTA, COV and THT after considering comments from DAHP, NPS, the Tribes, and other consulting parties; and
  - WSDOT and ODOT will distribute the final assessment to DAHP, NPS, the Tribes, and other consulting parties.

- The final Seismic Retrofit and Rehabilitation Feasibility Assessment will be completed by WSDOT and ODOT in coordination with FHWA, FTA, COV and THT prior to the demolition of the property. The decision to proceed with a Seismic Retrofit and Rehabilitation Plan will be made by WSDOT and ODOT in coordination with FHWA, FTA, COV and THT.
- COV, as property owner, will be a signatory on all documents.

II. Strengthen and Retrofit Plan

- If through the Salvage and Reuse Feasibility Assessment WSDOT and ODOT, in coordination with FHWA, FTA, COV and THT, determine that strengthening and retrofitting the building is prudent and feasible, WSDOT and ODOT will direct the preparation of a Strengthen and Retrofit Plan. The Strengthen and Retrofit Plan will be prepared and implemented prior to the beginning of construction in the area near the property.
- The Strengthen and Retrofit Plan will include a public process for consideration of prudent and responsible future uses of the building.
- WSDOT and ODOT will plan for and manage the completion of work relating to seismic retrofit, preservation of historic fabric, and disposal of any hazardous materials.
- The Project will make a significant contribution to costs for interior retrofit of the building to suit the determined future use.
- COV, as property owner, will be a signatory on all documents.

III. Salvage and Reuse Plan

- If through the Salvage and Reuse Feasibility Assessment WSDOT and ODOT in coordination with FHWA, FTA, COV and THT determine the building cannot be saved for strengthen and retrofit but that salvage and reuse is prudent and feasible, WSDOT and ODOT will direct the preparation of a Salvage and Reuse Plan. The Salvage and Reuse Plan will be prepared and implemented prior to the demolition.
- The Salvage and Reuse Plan will provide a proposed approach for salvage and reuse implementation.
- Preference will be given first to the COV retaining ownership and reuse of these materials and second to retaining public use of these materials within public spaces or structures in or adjacent to the VNHR and third, to public ownership and reuse of these materials within public spaces or structures outside the VNHR. If reuse in these manners is found to be infeasible, or additional public entities demonstrate no interest in salvage or reuse, WSDOT and ODOT, in coordination with FHWA, FTA, COV and THT, may also explore the opportunity for reuse by the general public.
- Implementation of the Salvage and Reuse Plan will consider:
  - If the property is salvaged, WSDOT and ODOT will plan for and dispose of any resultant hazardous materials.
  - If no party that is willing and able to salvage and reuse property components is identified within six months of WSDOT and ODOT's initial advertising availability, WSDOT and ODOT will notify COV, THT, and consulting parties.
  - If no party that is willing and able to acquire and relocate the property within six months of WSDOT and ODOT's initial advertising of availability, and the assessment and cost proposal has determined salvage is feasible, WSDOT and ODOT will deconstruct the structure and will ensure that small structural elements are available for reuse and will make availability of these known through appropriate media.
- WSDOT and ODOT will oversee the implementation of the following scope of work:
  - WSDOT and ODOT will deliver the draft Salvage and Reuse Plan for review by FHWA, FTA, DAHP, COV and THT.
  - WSDOT and ODOT will deliver the final Salvage and Reuse Plan to FHWA, FTA, COV and THT after considering comments from DAHP, NPS, the Tribes, and other consulting parties.
  - WSDOT and ODOT will distribute the final Salvage and Reuse Plan to DAHP, NPS, the Tribes, and other consulting parties.
  - COV, as property owner, will be a signatory on all documents, not a consulting party.

Section 3.9 Visual Quality

The Historic Reserve portion of the Greater Central Park Landscape Unit attracts all portions of the population identified in the DSEIS as being influenced by visual character – local and

regional residents, and tourists. Those users utilize all forms of transportation stipulated – motorized vehicles, bicycles, public transit, and pedestrian, as well as mobility assistance devices such as motorized wheelchairs, skateboards, Segways, scooters, and similar.

THT concurs that the overall effect on visual quality will be adverse.

P. 3.9-4 Table 3.9-2
The Visual Character description of Greater Central Park should be changed from: "Park-like campus and open fields crossed by several major roadways and elevated railroad tracks. Recreation- and education-oriented development" to: Park-like campus and open fields crossed by several major roadways and elevated railroad tracks. Recreation- and education-oriented development. Area includes historic districts relating to early British fur-trading and later U.S. Army usage. Buildings and grounds in the Officers Row and the West Barracks have residential, retail, commercial, recreational, community commemoration, and educational uses, and versatile event venues.

P. 3.9-6 Table 3.9-3
Viewer groups for Greater Central Park should also include Residential, Educational, Retail/Commercial, and Civic.

P. 3.9-18 Greater Central Park Landscape Unit
The first sentence notes that many views are currently blocked by existing vegetation. As this project will have visual impacts for many decades into the future, consideration must be given to how views will change when that vegetation, such as trees, dies or is removed for other reasons in the future. Mitigation must include a fund for future landscape screening. Project construction may result in the removal of vegetation, as noted on p. 3.9-25, which will require replacement immediately.

P. 3.9-22 Table 3.9-8 Greater Central Park Landscape Unit Degree of Impact on Visual Quality

In addition to the impacts noted, the removal of the Post Hospital, should that be necessary, would immensely impact the "cultural order" category and raise the degree of impact to 7.

P. 3.9-27 3.9.5 Indirect Effects
Description of the Greater Central Park Landscape Unit should also include West Vancouver Barracks.

3.9.6 Potential Avoidance, Minimization, and Mitigation Measures
p. 3.9-27 Regulatory Requirements, bullet one – add design standards for all of Central Park and those specific to the VNHR.

Place-Specific Mitigation
P. 3.9-29 – Greater Central Park Landscape Unit

Add:
Vancouver National Historic Reserve
Consult and comply with Vancouver Central Park and Vancouver National Historic Reserve design standards for period-appropriate landscape screening and replacements of vegetation as needed.

The western edge of the VNHR will be affected by the design of the new connector between downtown Vancouver and the Reserve. Mitigation can include appropriate plantings and vegetative screening as necessary to enhance the visual and experiential qualities of the connector, and views to and from it.

3.9-30 Mitigation for Temporary Effects

Add:
Place-Specific Mitigation
Greater Central Park Landscape Unit

- Communicate responsibly and pro-actively with site managers at the VNHR (THT and National Park Service) about intrusive temporary impacts and their duration.

  Throughout construction near the COV-owned buildings at the VNHR, THT needs as much advance notice as possible of impacts such as noise, dust, and glare, and their expected duration, so that staff can keep commercial and residential tenants and event venue renters apprised, and time and plan the organization's community events as carefully as possible.

Section 3.10 Air Quality

Page 3.10-15 Mitigation for Temporary Effects

Add:
Place-Specific Mitigation
Greater Central Park Landscape Unit

- Communicate responsibly and pro-actively with site managers at the Vancouver National Historic Reserve (The Historic Trust and National Park Service) about intrusive temporary impacts and their duration.

  Throughout construction near the City of Vancouver-owned buildings at the Vancouver National Historic Reserve, The Historic Trust needs as much advance notice as possible of impacts such as extra dust, and its expected duration, so that staff can keep commercial and residential tenants and event venue renters apprised, and time and plan the organization's events as carefully as possible.

Section 3.11 Noise and Vibration

As section 3.1.1 Noise Environment of the *Noise and Vibration Technical Report* notes on pages 3.11-1 and 3.11-11, the VNHRHD is located in an area where noise levels are already significant from all the sources mentioned, and increases are predicted on p. 3.11-13, no matter which alternative is eventually implemented. Additionally, noise is expected to increase over time due to additional traffic. THT is therefore concerned about how increases will affect the residential, commercial, recreational, and educational uses of the site by tenants and the visiting public. Mitigation will be required.

Throughout construction near the City of Vancouver-owned buildings at the Vancouver National Historic Reserve, THT needs as much advance notice as possible of impacts such as increased

noise and vibrations, and their expected duration. Trust staff must apprise commercial and residential tenants and event venue renters of same, and time and plan the organization's own public events as carefully as possible.

Figures 3.11-7 and 3.11.8, pp. 3.11-18 and 3.11-19 and p. 3.11-24 Fort Vancouver – Modified LPA Modeled Traffic Noise Levels

The expected traffic noise impacts recorded at receptor FV-018 near the NCO duplexes will negatively affect those residing there, and possibly those working in or hosting events at the nearby Red Cross Building and Artillery Barracks. Figure 3.11-8 adds areas of special concern at FV-002, FV-003, FV-004, and FV-005 which are located by buildings adaptively re-used for commercial rentals, and the Police Headquarters.

Mitigation in the form of a sound wall and screening vegetation will be necessary. Sound wall design and vegetation will conform with design guidelines for the VNHR Historic District. THT will participate in the sound wall design planning and in vegetation selection. If it proves:

- necessary to vacate the residential and commercial rental properties during construction, and/or not schedule events in the venues, the IBR project must compensate for the loss in revenue, and

- impossible to rent any of the affected units at a rate which is sufficient to provide enough revenue to properly maintain the buildings and event venues, IBR project must provide funding to compensate for the loss.

Noise monitoring should continue throughout construction and beyond to determine actual level of impact. IBR project will provide the THT access to the information produced by the monitoring, discuss the results, and provide any necessary restitution for losses in revenue.

p. 3.11-24
The VNHR offices referred to in the "Fort Vancouver" section at or near FV-002, 3, 4, and 5 each contain multiple tenants. Change text to: …noise levels would be above the WSDOT NAC at two residences and four total office buildings, each of which contains multiple tenants…

Construction Vibration p. 3.11-33
THT continues to be concerned regarding construction vibration negatively impacting buildings on the western edge of the VNHR, particularly those west of Fort Vancouver Way. Especial concerns are raised regarding the URM Post Hospital, brick NCO duplexes, and all the buildings with brick foundations west of Fort Vancouver Way.

Vibration monitoring should continue throughout construction and beyond to determine actual level of impact and be extended into the VNHR at least as far as 1101 Evergreen Blvd., the Grant House. IBR project will provide THT access to the information produced by the monitoring, discuss the results, and provide any necessary restitution for losses in revenue due to disruption and/or damage from vibrations.

3.11-6 Potential Avoidance, Minimization, and Mitigation Measures

THT requests consideration of a noise wall south of Evergreen Blvd.

P. 3.11-36 Table 3.11-13 Noise Wall Analysis Summary

11A – The noise wall described here would seem to be a reasonable mitigation measure. Concerns include whether 6 ft. is high enough and/or 464 ft. is long enough. As manager of property close to the wall, THT must be included to consult on wall design and appearance, and vegetative screening which complies with landscape guidelines for the historic area. Another concern is how sound will pass over the wall, and how far into the historic district it will travel. Existing signage at the edge of the freeway indicates the location of Officers Row, and helps draw visitors and business clients into the historic area. Loss of the sign will need to be mitigated with another means of drawing people in which fits well with the IBR project.

P. 3.11-38

The concluding sentence states that balloting of benefitted receptors will take place. THT needs additional information on the process as to how it is decided who votes, and how to provide input on same.

P. 3.11-53 Construction Vibration

Bullet 2: The number of feet should not be the sole consideration for how far monitoring extends to the east. The type of buildings and building materials must be taken into consideration. For example, buildings with brick foundations should be monitored. All construction-related vibration must be monitored for historic structures in proximity to the project to determine if cumulative effects of all the vibration are occurring.

3.23 Cumulative Effects

3.23.-11 Land Use and Economic Activity

The Land Use and Economic Activity section should contain a paragraph about the Vancouver Barracks Post Hospital, owned by the City of Vancouver, in the VNHR Historic District. The project's Adverse Effects will greatly affect the economic future of the former hospital.

Similarly, the overall Adverse Effect for the Vancouver National Historic Reserve will impact the city-owned buildings there. Noise, vibration, visual, and atmospheric effects during construction, and permanent increased noise and visual changes after construction, will affect people's decisions as to whether or not to rent commercial and residential spaces and event venues. Rental revenue is a critical component in enabling appropriate maintenance and preservation of these historic buildings, and being able to pass them on to the future.

This section should also make reference to the planned community connector, which will positively stimulate heightened economic activities in downtown and the Historic Reserve and synergistically link the two areas.

P. 3.23-20 – Parks and Recreation Cumulative Effects

Evaluation of the increased access to the public recreational, educational, residential, and business activities of Officers Row and the West Barracks at the Vancouver National Historic

Reserve should include studies to most effectively place, and potentially increase directional signage on the freeway, at transit stations, and at the community connector under development between downtown Vancouver and the Reserve.

P. 3.23-22

The Historic Built Environment section must contain a specific reference to the adversely-effected Vancouver Barracks Post Hospital. The eastern edge of the IBR project will greatly affect to what extent the building can be preserved and re-used.Loss of the building would negatively permanently affect the number of buildings available for public use and interpretive education, and the visual qualities of the site.

Paragraph 5: Aegis/Providence Academy redevelopment is incorrect. The Aegis project name changed to Aeon. The Aeon project was not built in conjunction with Providence Academy.

Paragraph 6: The most public-facing way to mitigate the negative effects of the project on historic resources is to invest in structural and aesthetic preservation of them. Presently, the projected mitigation is documentation-heavy and structural preservation-light. Public engagement with historic resources will be most benefited by actions to help save the buildings, continue to adaptively re-use them, and pass them on to future generations.

P. 3.23.23 Cumulative Effects

Conclusion – Historic Built Environment
Paragraphs 2, 3, and 4 all refer to the Adverse Effects of the Modified LPA on historic resources. The most effective way to ameliorate those effects is to direct mitigation efforts toward keeping existing buildings standing and historically-preserved for public usage for businesses, housing, education, and enjoyment.

Visual Quality

P. 3.23-23

The potential loss of the historic Vancouver Barracks Post Hospital needs to be taken into consideration in terms of project impacts on visual quality. This large, imposing building is an important part of local history, and also provides a visual edge to the western side of the West Barracks area. Demolition and replacement would have a significant impact on any viewer.

Noise and Vibration

The Post Hospital specifically has played an unofficial role as a noise barrier. Should this building be removed due to construction impacts, the resulting noise increase will affect the entire western side of the Historic Reserve.

P. 3.23-26 Paragraph 2

The importance of the Vancouver National Historic Reserve in civic life must be specifically recognized and accounted for. To accomplish this, change: "Many residences and other uses in

the study area, including those adjacent to I-5 and the proposed light-rail transit line, have experienced increasing noise levels over time…" to "Many residences and other uses in the study area, including those adjacent to I-5 and the proposed light-rail transit line such as the recreational, commercial, residential, and educational opportunities at the Vancouver National Historic Reserve, have experienced increasing noise levels over time …"

P. 3.23-26 Cumulative Effects Conclusion – Noise and Vibration

THT is extremely concerned about the short-term construction and permanents impacts of increased noise and vibration on the Vancouver National Historic Reserve, and looks forward to continuing to work on mitigating them.

Energy

Cumulative Effects Conclusion - Energy

P. 3.23-29 Paragraph 5

THT is interested in helping reduce local energy demand by instituting such measures as installation of roof-top solar panels where feasible, such as on the roof of the Police Headquarters Building, and instituting other energy conservation measures that do not impact, or have justifiable impacts, on historic structures. Discussions regarding how energy conservation measures could be part of the mitigation of Adverse Effects on the Historic Reserve would be beneficial for the public.

P. 3.23-41 Climate Change

THT is seeking to explore how the Vancouver National Historic Reserve can contribute to reduction of GHG. The environmental advantages of re-using buildings, "the greenest building is one that is already built," and thus continuing the use of old-growth timber that has already been harvested, are already inherent in the historic districts. However, measures to increase energy conservation in building operations and produce energy with roof-top solar panels are items to discuss as both beneficial for the environment and applicable to mitigation.

Section 4F

P. 4-11 Inset map of Figure 4-1

This map incorrectly identifies the Artillery Barracks as the Post Hospital. The hospital is farther to the west right by the freeway, west of the Red Cross Building and by the Interstate 5 shield.

P. 4-13 Figure 4-3

The U.S. Army no longer owns any land at the Vancouver National Historic Reserve. The property identified as belonging to the Army is National Park Service property.

P. 4-16, Paragraph 1
The U.S. Army is no longer a partner in site operations, having entirely vacated in 2011. Remove reference to the Department of the Army as a site management partner.

P. 4-20 Figure 4-8

Correction needed to more clearly delineate the VNHR. It is difficult to see all the brown outlines and brown underlay indicating the VNHR. People who are unfamiliar with the area will find it challenging to see where it is.

Whereas the name of Fort Vancouver National Historic Site is in generally the correct location, including just one name incorrectly implies that there is one sole owner of the area. The figure would be clearer with additional owners indicated.

P. 4-24 Chapter 4, WA 368, 369, 918, 109

The description is not as clear as it could be. Edits below.

The VNHR is an NRHP-listed historic district that encompasses 397.7 acres and includes four listed or determined eligible historic districts and one historic site which all include multiple historic and cultural resources. Of the 397.7 acres within the VNHR boundary, 49.74 acres were WSDOT highway right of way at the time of listing of the reserve and do not contribute to eligibility. The Fort Vancouver National Historic Site was first established as a national monument in 1948, and was elevated to an historic site in 1966 to preserve and interpret historically significant and exceptionally complex overlapping areas associated with Native American, Hudson's Bay Company, U.S. military, and NPS uses of land that have occurred over time. The VNHR was created by an act of Congress in 1996.

P. 4-25 WA 1148

The patrol headquarters was built in 1979, not 1975.

Section 4-5

P. 4-52 – Paragraph 4

Concluding sentence does not include the section number of the evaluation.

P. 4-52 – Paragraph 6

The Discovery Walk Festival no longer occurs.

P. 4-53 – Paragraph 4

Second line – The Fort Vancouver NHS does not include the entire Vancouver Barracks Historic District. A rephrasing is needed: Fort Vancouver NHS includes part of the Vancouver Barracks Historic District determined eligible in 1984. Those elements include the HBC....

P. 4-108

The first sentence of the description incorrectly implies that there are five total historic properties. Though the quantity is addressed in the next paragraph, a more accurate statement for this introductory paragraph would be: The VNHR Historic District is an NRHP-listed historic

district that encompasses 397.7 acres and includes one historic site and four NRHP-listed or determined eligible historic districts which each contain multiple historic resources …

P. 4-109 Figure 4-39

This figure would be clearer with additional information indicating ownership.

P. 4-110 Paragraph 5

The Trust is concerned that vibrations from installation of the tie-back anchors at the northwest corner might harm the historic structures in that area.

P. 4-111 Paragraph 1 and following bullet points.

The IBR Program will cumulatively adversely affect the entire VNHR. The list of contributing properties should include all historic resources within the VNHR. The permanent incorporation of land will impair the likelihood of rehabilitation of the Post Hospital. Loss of the Post Hospital will have a negative historic effect on the site, and also mean that a barrier to sound entering the site will be lost and noise will increase for visitors, tenants, and event venue users.

Pp. 4-111 and -112

Vibrations – THT is concerned about the adverse effects of vibrations on the VNHR, especially the buildings from the Grant House west.

P. 4-112

Aesthetics - Views from additional buildings should be taken into account. For example, people on the second stories of buildings on Officers Row and in the West Barracks will likely be able to see the IBR. Additionally, as trees change over time whether through pruning, removal, or replacement with small ones, the views will change.

p. 4-113

Noise – THT is concerned that increased noise levels will result in lowered public interest in renting residential, commercial, and event spaces. Loss of rental income will impair the ability of the Trust and the City of Vancouver to be excellent maintenance stewards of the buildings. Recreational and educational aspects of the site will be diminished for the public as extra noise will affect enjoyment of such site activities as walking and biking and taking walking tours.

P. 4-121, Bullet Point (ii)

THT urges inclusion of a robust public process in making decisions about the Post Hospital and has made comments to this effect on Chapter 3.8 and the draft Programmatic Agreement.

P. 4-128

All design options will result in permanent incorporation of VNHR property into the project and increase of noise, and temporary vibratory impacts on VNHR buildings. The final line of

paragraph 7 does not indicate sufficient mitigation. The national significance of the property and value to the community require more than "standard" mitigation. THT urges mitigation that focuses on building stability and other measures for long-term physical preservation in recognition of permanent and cumulative site impacts.

P. 4-129

The final line of paragraph 5 indicates that noise mitigation is not reasonable. Options other than demolition of the Normandy Apartments must be explored so that the increase of noise can be mitigated. If the noise cannot reasonably be mitigated, comparable mitigation should be applied elsewhere within the APE or reasonably adjacent to the APE to help amend the cumulative and permanent damage to the site.

P. 4-129 Paragraph 5

Condition inspection of the Post Hospital must take place well ahead of start of project construction so that proper planning for, and public engagement about, rehabilitation or removal can be efficient and effective.

P. 4-134 Paragraph 3

The final line of paragraph 3 should be changed to: There would be visual and noise effects on recreational and educational opportunity users, commercial and residential tenants, and event venue renters at the Fort Vancouver NHS and the City of Vancouver-owned properties in the VNHR historic district managed by THT.

P. 4-135 Paragraph 1

The note that the majority of historic sites are NRHP-eligible at the local level does not take into account the multiplicity of resources within the VNHR, all of which are listed in the NRHP at the national level of significance.

P. 4-135 Section 4.6.4

The Vancouver National Historic Reserve was created by an act of Congress in 1996 in addition to the Fort Vancouver National Historic Site being created by an act of Congress.

P. 4-140 Paragraph 1

It is important to note here the significance and lasting import of a well-designed community connector between downtown Vancouver and the VNHR in contributing to neighborhood access and mobility between these important civic locales.

P. 4-145 Paragraph 1

THT looks forward to being an active partner in determining what mitigation results from the project in terms of achieving the most public good through historic building preservation utilizing reasonable public expenditure.

Visual Quality Technical Report

Page 2-12 2.4.2.1 Types of Neighbors

Types of viewers at VNHRT include residential, recreational, civic, retail, and commercial.

2.4.2.2 Types of Travelers

The VNHR attracts all types of travelers listed: motoring, bicycle, and pedestrian.

P. 3-3 3.1.2 Regulatory Context

The list does not include any of the governing documents for the VNHRT.

P. 3-4 3.1.3.2 Key Viewpoints

While it is not possible as noted in the Key Viewpoints section description to assess every view, Figure 3.2 on page 3-6 shows only a small number of viewpoints which does not seem sufficient to capture the complexity of views in different areas. Suggest at minimum adding three more view evaluations from Evergreen Blvd. and Ft. Vancouver Way looking west, from the second floor porch of the Grant House looking west, and McClellan Avenue and Ft. Vancouver Way looking west. The upper floor of the Grant House should provide perspective on what will be visible above the trees, and offer an opportunity to assess what the view will be as the height of trees will change over time. In regard to the possibility of the loss of the Post Hospital which forms a barrier between the Reserve and the new construction associated with the bridge, consideration must be given to what the westward view from the Reserve will be if this large building is gone.

Noise and Vibration Technical Report

Suggest that title be changed to "Considering the importance of our natural and cultural environment" or some other phrasing to indicate that the built environment is part of the study.

P. 3-3 3.2.4 Fort Vancouver Land Use

This paragraph incorrectly states that the O.O. Howard House is part of the Officers Row National Historic District. Rather, it is part of the Vancouver National Historic Reserve and Vancouver Barracks historic districts.

P. 3-11 Figure 3.7

Modelling should be done to determine to what degree the noise level will increase at the VNHR Historic District if the Post Hospital is removed.

Attachment B: City of Vancouver's Desired Outcomes and Conditions of Approval for the Mo Commitments

	Category	Item
		City of Vancouver Desired Outcomes
1	Overall	Meet or exceed climate and equity goals as defined by the city, region, and IBRP advisory the program
2	The Built Environment	Construct the bridge and all related structures to be resilient in the event of a Cascadia Se
3	The Built Environment	Support efforts to make current and future Downtown Vancouver a thriving and attractive within the greater Portland-Vancouver region
4	The Built Environment	Improve connectivity for all users among key downtown and Historic Reserve destinations and placemaking opportunities
5	The Built Environment	Extend Main Street to the Vancouver waterfront and identify additional opportunities to r roadways within the bridge influence area
6	The Built Environment	Improve access to transit for all users
7	The Built Environment	Improve access and connectivity throughout local bikeway, roadway, and sidewalk system
8	The Built Environment	Improve multimodal access and connectivity to, from, and across the Interstate 5 regional Downtown Vancouver and the Historic Reserve area
9	The Built Environment	Include a dedicated guideway for transit that accommodates multiple high capacity transi serve both current and future transit needs as the region grows
10	The Built Environment	Replace and/or upgrade subsurface City assets where appropriate to support new infrastr
11	Urban Design	Prioritize the movement of people, freight, and goods
12	Urban Design	Emphasize and center human and natural systems
13	Urban Design	Integrate and recognize the IBRP area's history, especially that of Indigenous Peoples
14	Urban Design	Better connect the west side of Interstate 5, the City's core downtown area, with the east City's Historic Reserve area, via a lid or some other public open space over Interstate 5 so connecting Library Square to the Historic Reserve

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	Category	Item
15	Urban Design	Create new public open spaces under the bridge that serve the region's diverse and growi Vancouver's waterfront, and integrate with existing and forthcoming open space investm
16	Urban Design	Establish continuity and integration of design associated with transit improvements that c future downtown transit investments
17	Urban Design	Integrate new aesthetic features to amplify Vancouver and associated bridge improvemer destinations
18	Mobility	Focus on efficient, connected, and safe movement of people, freight, and goods
19	Mobility	Provide more reliable travel for all modes and all users
20	Mobility	Reduce overall Interstate Bridge congestion and length of peak congestion periods includi
21	Mobility	Reduce peak period impacts on the local road system
22	Mobility	Reduce collisions on local roads leading to and within downtown
23	Mobility	Incorporate tolling to fund construction of the Bridge and associated elements
24	Mobility	Retain three through travel lanes on Interstate 5 in the Bridge Influence Area and, based c accompanying auxiliary lanes to support the Program's Purpose and Need
25	Construction, Operations & Maintenance	Meet or exceed requirements to employ Minority, Women, and Disadvantaged Business E
26	Construction, Operations & Maintenance	Create opportunities for inter-generational wealth through workforce investment prograr and construction phases of the program
27	Construction, Operations & Maintenance	Implement tolling in an equitable manner that includes mitigation programs
28	Construction, Operations & Maintenance	Proactively mitigate construction impacts to Downtown Vancouver businesses, residents,
29	Construction, Operations & Maintenance	Efficiently manage post-construction operating and maintenance costs
30	Construction, Operations & Maintenance	Use climate smart construction materials built for existing and future types of transportat

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		City of Vancouver Modified Locally Preferred Alternative - Conditions of Appro
31	Community & Stakeholder Engagement	Engagement must be accessible and open to a wide variety of stakeholders and all commu
32	Climate	In collaboration with Program partners define a GHG reduction goal that is Program-speci regional, and local GHG emission reduction goals, including the City's goal of carbon neutr
33	Climate	The GHG analysis committed to by IBR Program shall include data related to changes in tr and induced demand), modeled vehicle miles traveled at years 2030, 2040, 2050, and ass consistent with Oregon and Washington State Departments of Transportation toll prograr
34	Climate	Collaborate with Partners to define mitigation strategies for urban heat island effects and Program infrastructure and vehicular traffic .
35	Climate	Prepare and present a plan that shows how Program-related GHG will be monitored and r construction, and how it will be mitigated plus funding options for mitigations. There shal progress, with annual reporting on status of GHG target and mitigation efforts to offset e
36	Equity	The IBR Program shall assess the impacts of the Program on Black, Indigenous and People communities, low- and moderate-income residents, renters, people with disabilities and r equity-priority populations in the region using partner agreed-upon methodologies and da include an assessment of the distribution of program impacts and benefits (as defined by Mobility Advisory Committee- #18 below), potential outcomes, and mitigations for equity 2030, 2040 and 2050.
37	Equity	Evaluate equitable outcomes using performance measures developed by the IBRP Equity A benefits and impacts to equity priority communities (including BIPOC).
38	Equity	Prioritize historically marginalized and underserved communities within Program area to e implement and evaluation of success of project.
39	Bridge Replacement	Further analysis is needed to determine design of a bridge that meets the defined Prograr
40	Bridge Replacement	Confirm the constraints on bridge design related to navigation and airspace.

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41	Bridge Replacement	The bridge shall have the highest quality architecture for the project allowable by enginee reasonable cost to produce a signature design.
42	Bridge Replacement	The bridge cannot negatively impact City of Vancouver's ability to convert Washington Str any other future changes to the local road network and related facilities as defined by the phase of the IBR Program.
43	Transit	Safety and Security is a primary objective of the transit system and specific improvements should be deployed to ensure maximum security and safety for transit patrons and the ad
44	Transit	All park and ride location(s) within the City of Vancouver will be determined in partnershi and C-TRAN, be designed to integrate with the community character and landscape, and r multimodal access, safety, and circulation.
45	Transit	Ensure that design of the transit guideway allows for access and use by buses and emerge light rail transit.
46	Active Transportation	Active transportation facilities shall be designed to facilitate a comfortable, low stress exp and in all types of weather, prioritize safety of vulnerable users and ensure safe and conve network to new facilities.
47	Active Transportation	Active transportation facilities shall be designed to minimize users' exposure to roadway p matter and hazardous chemical compounds.
48	Interchanges & Roadway Design	More detailed design of interchanges in Vancouver is required to fully evaluate potential development potential, and enhanced access for all users.
49	Interchanges & Roadway Design	Interchanges and roadways must be designed with a goal to not impact any properties ou
50	Freight	Preserve and enhance freight access in a manner that is safe, efficient, and does not nega design or character.
51	Transportation Demand Management & Tolling	The Program shall further refine scenarios with variable rate tolls on the existing I-5Bridge
52	Transportation Demand Management & Tolling	Demand management strategies shall be developed with the goals to manage auto dema peak traffic periods, support downtown Vancouver's circulation goals, reduce greenhouse include the use of variable rate tolling.

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53	Transportation Demand Management & Tolling	Freeway access streets should receive additional traffic management as warranted and ag
54	Urban Design	The bridge river crossing shall be an iconic design, connect the historical and interpretive elements, and not harm the landscape or existing archeological or cultural resources.
55	Urban Design	Recreational and open space design shall be determined in collaboration with Program pa
56	Urban Design	The bridge design shall improve the existing user experience in downtown Vancouver, acc and welfare of the general public. In circumstances where nuisances are reasonably expec impacts will be mitigated to the maximum extent practicable.
57	Urban Design	Community connections shall be designed to connect historical and cultural landscape ele not limited to a lid over I-5 connecting Downtown to the Historic Reserve, extension of M redevelopment or re-use of land unencumbered by physical structure for the bridge itself treatment facilities (5th Street to north bank of the Columbia River).
58	Enhancement, Impact Avoidance, Mitigation	The IBR Program shall provide the highest model of environmentally and socially friendly bridge of its proposed size and scale. Temporary screening of construction and staging are appealing and help tell the story of the bridge and community.
59	Enhancement, Impact Avoidance, Mitigation	The Program must respect properties outside of WSDOT ROW and have a goal to avoid bo impacts to those properties during and after construction. If impacts are unavoidable, the full extent practicable and as required by prevailing federal, state or local laws and ordina
60	Enhancement, Impact Avoidance, Mitigation	The Program must identify proposed mitigation for any potential adverse human or natur
61	Enhancement, Impact Avoidance, Mitigation	The City of Vancouver must be included in any Health Impact Assessment (HIA) work inclu
62	Construction and Contracting	The Program shall implement a robust workforce training and apprenticeship program tha Vancouver and Clark County residents.
63	Construction and Contracting	The Program shall minimize and mitigate disruptions to residents, businesses, roadway us environment resulting from construction and staging activities, including maintaining mul circulation.

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		IBR Program - Commitments for Modified Locally Preferred Alternati
64	Process	The IBR program will develop a workplan to address partner requests and conditions of ap address any conflicts that arise between partner agencies independent conditions of appro timeline for responding to partner agency requests.
65	Community & Stakeholder Engagement	Authentically engage with the program's advisory groups in all major program decisions, ti
66	Community & Stakeholder Engagement	Commit to partner engagement to help shape a communications strategy and execution, e the development of the program design.
67	Community & Stakeholder Engagement	Commit to a robust community engagement program to solicit and obtain public input for including establishing public priorities for design and evaluation of impacts to the built and input on design options.
68	Community & Stakeholder Engagement	Develop a Community Benefits Program.
69	Climate	Provide a high level of sustainable design and construction practices including a stormwate impact on fish, wildlife, and watershed health.
70	Climate	Prepare an in-depth Greenhouse Gas (GHG) analysis including climate change, air quality, c Miles Traveled (VMT).
71	Equity	Prepare an Equity Report that assesses the impact of tolls on low-income people, including access to technology for payment of tolls; the impact of the project on low-income and mi to affordable housing and employment; and the impact of the project on populations at or entails an examination of access to jobs and services, physical accessibility, potential negat construction and/or property acquisition, and other elements in alignment with our equity
72	Equity	Implement an accountability tracking tool that will include regular staff reports to the prog Group regarding how the Equity Framework (and equity more broadly) has shaped decisio
73	Equity	Prioritize access, influence, and decision-making power for marginalized and underserved c program in establishing objectives, design, implementation and evaluation of success.
74	Bridge Replacement	Employ high quality architectural design for the North Portland Harbor Bridge and Columbi

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75	Bridge Replacement	Design a bridge that is aesthetically pleasing, cost efficient, and sustainable.
76	Bridge Replacement	Design and construct the program following principles of sustainability, cost efficiency, con avoidance and minimization of impacts.
77	Transit	Develop the high-capacity transit terminus, station placement, alignment and design to allo connections.
78	Transit	Develop options and define impacts and costs for the high-capacity transit alignment accou opportunities, safety and efficiency, traffic movement, construction costs and impacts.
79	Transit	Conduct further analysis on the size and design of park and rides accounting for ridership a impacts on the street network and integration with the surrounding land uses; document i Environmental Impact Statement (SFEIS).
80	Transit	Develop stations, furnishings, roadwork and sidewalk elements in character appropriate to Island.
81	Transit	Refine station locations accounting for safety, compatibility with surrounding uses, cost-ef operations.
82	Transit	Develop a plan for Transit Operations & Maintenance funding sources.
83	Transit	Optimize the HCT option selected to maximize ridership potential and improve the transit n needs today and into the future; and that fits within the operating plans of the two partne and TriMet.
84	Active Transportation	Undertake additional design to include robust active transportation facilities on the bridge, the program area; meet or exceed standards; meet the active transportation demand cons transportation demand measures.
85	Active Transportation	Provide good active transportation connections to HCT stations including infill of missing se
86	Active Transportation	Retain and enhance multimodal transportation especially in the vicinity of highway overcro
87	Freight	Confirm the configurations of the Marine Drive/Hayden Island and Mill Plain interchanges a and efficient movement of freight and workforce traffic and complement current and futu Port's Marine Terminals and key industrial districts.
88	Freight	Ensure the auxiliary lane design and configuration on the bridge allows for safe and efficien general-purpose traffic. Develop the design of the bridge to consider adequate shoulder w high, wide and heavy and general industrial freight and containers.

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75	Transportation Demand Management & Tolling	Develop a comprehensive TDM program that includes variable-rate tolling.
90	Transportation Demand Management & Tolling	Use TDM to help manage peak period auto demand.
91	Transportation Demand Management & Tolling	Implement tolling on I-5 as soon as legally and practically permissible.
92	Transportation Demand Management & Tolling	Develop a plan to educate the public about tolls.
93	Transportation Demand Management & Tolling	Evaluate and seek authorization for pre-completion tolling of the existing bridge under Titl replacement bridge is under construction.
94	Enhancement, Impact Avoidance, Mitigation	(General) Right size and develop a transportation program that is responsive to community responsible, resilient to future climate and social changes, and satisfies the Purpose and Ne
95	Enhancement, Impact Avoidance, Mitigation	(HIA) Work with Multnomah County and other interested agencies to develop a Health Imp the potential impacts and benefits to human health from the program.
96	Enhancement, Impact Avoidance, Mitigation	(NEPA) Prepare a Supplemental Environmental Impact Statement (SEIS) pursuant to the Na Act (NEPA) that assesses potential impacts to the built and natural environments including change and greenhouse gas emissions; the SEIS will include mitigation measures to avoid o feasible. The SDEIS will include opportunity for public input and comment during a public r hearing(s).
97	Enhancement, Impact Avoidance, Mitigation	Prepare a sustainability plan.
98	Construction and Contracting	Develop a construction management approach that includes appropriate requirements to footprint during construction.
99	Construction and Contracting	Set targets to achieve DBE utilization and employ innovative strategies to achieving workfo
100	Financing	Develop a financial plan including capital sources and uses of funds for presentation to the public that indicates federal, state, and local funding.
101	Financing	Prepare a Level 2 toll traffic and revenue study.
102	Financing	Prepare an investment grade (Level 3) toll traffic and revenue study.

Attachment C:
Summary of feedback on the Draft SEIS from City of Vancouver Advisory Bodies and general public

Summary of Board & Commission Meetings

City of Vancouver staff presented findings from the Draft SEIS to seven City boards and commissions during the public comment period. The following sections highlight key discussion topics from each of those presentations. In addition to the summaries below, some groups, including the Parking Advisory Committee and City Center Redevelopment Authority, have submitted their own comment letters on the Draft SEIS.

City staff will continue to provide updates to these boards and commissions throughout the environmental review and design processes.

Parking Advisory Committee (PAC)

10/9/2024

- **Park and Ride concerns:** Initial modeling for the Modified LPA predicted full utilization of two park and rides in Downtown Vancouver. Given that the existing Downtown parking supply is underutilized, the committee discussed the implications for the IBR program and the need for additional structures.
- **Regulation issues:** Discussion on how to regulate usage of parking lots, especially for people working in Downtown Vancouver. Final design needs to clarify operational considerations.
- **Environmental considerations:** Questions raised about the environmental impact of park and rides, including GHG analysis and their alignment with climate goals.

Parks and Recreation Advisory Commission

10/16/2024

- **Kiggins Bowl impact:** Uncertainty around the timeline and extent of impact from the temporary construction easement.
- **Stormwater management:** Clarifications needed on the distinction between stormwater management and parkland mitigation.
- **Safety and community concerns:** Emphasis on safety for pedestrians and cyclists, tree preservation, and honoring culture through design.

City Center Redevelopment Authority (CCRA)

10/17/2024

- **Park and ride concerns:** Concerns about the appropriateness of new, large parking structures in downtown, including the potential for vandalism and inefficiency. Conflicts

with vision for Downtown as a vibrant, walkable, transit-oriented place to live, work, shop, and visit. Impacts on future redevelopment potential.
- **Questions about:** the destination of park and ride users, other possible locations for park and rides, potential pricing, waterfront access under the bridge, light rail hours of operation, impact on traffic without the C Street ramps, and how the comments on the Draft SEIS will be used.
- **Downtown Parking Plan:** how does the City's draft plan address park and rides? Suggestion to mesh the recommendations from that plan to address IBR needs.

Planning Commission
10/22/2024

- **Equity concerns:** Concerns about potential impacts on low-income populations and vulnerable communities, particularly from displacement, tolling, and noise.
- **Questions about:** the adequacy of mitigation, partial acquisitions, and the viability of carpool programs.
- **Shared Use Path:** Concerns about the grade of the ramp connection. Want rigorous mitigation, given that the design is not final.

Aviation Advisory Committee
10/23/2024

- **Flight path impact:** Discussions on potential obstructions from the new bridge and impacts on flight paths, particularly regarding the height and location of the C Street ramps, SR 14 interchange, and construction equipment.
- **Construction impact:** Recognition of potential disruptions to airport operations during construction of the Modified LPA. Given the anticipated duration of construction, it won't feel "short-term".
- **Questions about:** visualizations from Pearson Field, height of new structures compared to existing downtown buildings, and economic impacts.

Transportation and Mobility Commission
10/29/2024

- **Active transportation access:** Practical and accessible design of active transportation connections to the bridge, particularly at the Waterfront, are needed. Consider an active transportation connection to Evergreen and elevators. Plan for electric powered devices.
- **Equity impacts:** Concerns about the impact of acquisitions and displacement on residents' homes and livelihoods. Provide multilingual communication about transit disruptions and support for small businesses during the construction phase. For tolling, offer the low-income discount program from the start and offer technical assistance to those that qualify.
- **Downtown:** Concerns about having an ugly park and ride structure Downtown and how it would be priced and managed to serve its intended purpose. Questions about the design for the waterfront area under I-5. Desire for more info on construction impacts to the waterfront, given its importance as an economic driver.

- **Questions about:** travel modeling assumptions and outputs, rationale for comparing to a No Build scenario, reasons for analyzing the "without C Street Ramps" and "westward shift of I-5" design options, cost-benefit and safety implications of the braided ramps and overpass reconstructions, relationship to planned improvements to Fourth Plain, construction packaging for contractors, budget for public art, and status of IBR funding.

Culture, Arts and Heritage Commission
11/07/2024

- **Construction effects on historic buildings:** Concerns about the proximity of construction to downtown Vancouver's unreinforced masonry buildings, which are vulnerable to vibrations and structural impacts. Recognize the deteriorated state of some historic buildings, provide thorough evaluations, and prevent unintended damage.
- **Specific sites of concern:** Providence Academy, Covington House, Officer's Row and Pearson Field and the West Reserve.
- **Preservation:** Focus on saving key remnants of the past.
- **Cultural representation:** Don't miss telling the important stories of underrepresented communities.

Summary of Public Meetings & Events

City of Vancouver staff attended various meetings and community events during the comment period to hear what questions and concerns the Vancouver community had about the IBR program and Draft SEIS. This included the following public events hosted by IBR, presentations to and discussions with community groups, and local events:

Date	Meeting/Event
October 1, 2024	Shumway Neighborhood Association Meeting
October 5, 2024	Old Apple Tree Festival
October 8, 2024	Lincoln Neighborhood Association Meeting
October 15, 2024	Downtown Stakeholders
October 15, 2024	Vancouver Open House
October 21, 2024	Esther Short NA Meeting
October 22, 2024	WA APEX Contractor forum
October 22, 2024	Rose Village Neighborhood Association Meeting
October 24, 2024	Vancouver Heights Neighborhood Association Meeting
October 26, 2024	IBR Public Hearing – Virtual #1
October 30, 2024	IBR Public Hearing – Virtual #2
November 4, 2024	Tour of Smith Tower
November 5, 2024	Shumway Neighborhood Association
November 13, 2024	Vancouver Neighborhood Alliance
November 14, 2024	Arnada Neighborhood Association Meeting
November 15, 2024	East Vancouver Business Association Meeting

The following section summarize the key themes from these meetings and events.

Active transportation access: Concerns about how people will access the shared use path on the bridge, considering the height of the new bridge. One access point at the Waterfront doesn't seem like enough and an additional access point to the shared use path at Evergreen is desired.

Climate and environmental: Concerns about negative impacts to the water, wildlife, trees and people who will have to deal with pollution/dust from construction. Desire for mitigation to include long-term air quality monitoring, as well as the early replacement and long-term maintenance of any trees removed. Requests for more measures to incentivize electric vehicle use and reduce vehicle miles traveled (VMT).

Construction: Common questions were related to construction phasing/timing, impacts and closures to the existing I-5 bridge, traffic impacts in neighborhoods during overpass reconstruction, and what will happen to the old bridge. Concerns about how construction is going to impact ADA accessibility, traffic, older buildings and the environment (particularly related to dust and noise). Downtown residents particularly concerned about impacts to congestion, pedestrian access, bus reliability, and emergency service access during construction.

Design: Common questions were related to the height of the bridge, number of travel lanes, frequency of bridge lifts, and the I-5/SR 500 interchange. Concerns about how high the bridge will be, that Coast Guard support/permit has not been secured and that some design details haven't been shared with the public yet, such as the Fourth Plain overpass. Support expressed for the Community Connector providing a better connection across I-5. People want clarity on how they will navigate to daily services, such as the grocery store or doctor. Communication with community throughout the design process will be critical.

Funding: Questions about how much funding has been secured and how much more is still needed. Concerns about how a new administration at the federal level might impact funding for the bridge.

Park and ride: Concerns about the excess of parking already in Downtown Vancouver and the potential for park and rides to exacerbate existing traffic problems. Downtown Vancouver is a destination, and a new garage in downtown may suggest Vancouver is merely a stop en route to Portland. Suggestions include: using existing parking rather than constructing new facilities, improving wayfinding and transit solutions, coordinating with private parking structures, and providing a valet/shuttle system. Additional concerns about accessible parking access.

Property impacts: Concerns about property acquisition and impacts to residents, businesses, public spaces, Providence Academy, the Vancouver National Historic Reserve, and other historic properties.

Transportation: Concerns about how the project will impact traffic, particularly in the downtown core of Vancouver where streets and on-ramps are already congested. Concerns about the potential negative impacts of light rail. Questions about the benefit of only two stations in Vancouver. Concerns that terminating light rail in downtown could create more congestion, with some desiring to have light rail extended farther north.

Tolling: Clarity needed about when tolling will be in place, what the pricing structure will be and what the money will be used for. Concerns that tolling will have a greater impact on low/fixed-income residents who cross the bridge multiple times a day. Suggestion that residents who are going to be directly impacted by construction for several years should have a lower tolling rate or be exempt from tolling.

Attachment C

CITY OF Vancouver WASHINGTON

MEMORANDUM

TO: **Interstate Bridge Replacement (IBR) Program Team**

FROM: **Ryan Morin, Chair**
Parking Advisory Committee (PAC)

DATE: **November 14, 2024**

SUBJECT: **Parking Advisory Committee comments on park and ride and IBR Draft Supplemental Environmental Impact Statement (SEIS) Report**

The City of Vancouver ("COV") Parking Advisory Committee ("PAC") was formed in 1999 to advise City Council on parking policy and implementation within downtown parking enforcement area. Additional PAC advisory duties include property acquisition or construction for parking facilities, parking analysis and studies, recommendations to adopt and amend ordinances related to on- and off-street parking.

Under the direction of the PAC, the COV Parking Services Division partnered with Walker Consultants to draft a new Access, Mobility, and Parking Plan ("Plan") for downtown Vancouver. The PAC is tasked with reviewing existing conditions, helping to develop action items, and provide guidance to the City's implementation of the Plan. Over the last 10 months, the PAC has reviewed extensive data, including downtown trip behaviors and occupancy and utilization data for on- and off-street parking spaces. The downtown core is expected to continue its dramatic growth, and this plan seeks to balance parking efficiency, access, curb management, and mobility alternatives to accommodate expected future growth.

During the PAC meeting in August 2024, IBR representatives provided an overview of the proposed IBR investments, and at the October 2024 meeting, COV staff, in collaboration with the IBR team, briefed the PAC on the key findings in the Draft SEIS related to the park and ride options under consideration. This memo summarizes the feedback provided by committee members during those meetings.

- New park and ride structures are in opposition to COV goals and policy to reduce the reliance on single occupancy vehicles downtown. A dispersed parking plan would better align with City goals. Investing in new parking facilities downtown will only induce more vehicle trips.
- COV Parking Services, along with partners, recently completed an existing conditions report. The report concluded that downtown Vancouver has roughly 14,000 parking spaces, the majority of which are chronically underutilized.
- The Library Square site (Evergreen #1) would be better utilized for other purposes. Building a parking structure would be a lost opportunity compared to a new transit-oriented development (TOD) focused on housing and commercial/retail amenities. The adjacent uses

are active and lively, park n ride facilities contribute to congestion that will negatively impact pedestrians.

- If new park and ride structures are required by federal partners, site W2 would be least harmful to long-term downtown development goals. Proposed site W2 is close to the Waterfront and may help to address parking demand in addition to serving transit users.
- In the opinion of PAC members, urban and dense areas are not ideal for park and ride locations. Leveraging existing suburban park and ride lots, with express buses bringing commuters to downtown, would be more ideal.

The Parking Advisory Committee strongly supports the City of Vancouver adopted goals, cited above, and therefore encourages the IBR project to utilize existing parking resources rather than building new park and ride facilities.

Attachment C

M E M O R A N D U M

TO: Interstate Bridge Replacement (IBR) Program Team

FROM: Patrick Quinton, Executive Director
City Center Redevelopment Authority

DATE: November 14, 2024

SUBJECT: CCRA Board Feedback on IBR Draft Supplemental Environmental Impact Statement (SEIS) Report

The Board of the City Center Redevelopment Authority ("CCRA"), a state-chartered public authority responsible for redevelopment within downtown Vancouver, has reviewed relevant sections of the Draft SEIS and received a briefing on the report from City of Vancouver ("City") staff on October 17, 2024. This memo summarizes the feedback provided by the Board during that meeting and in individual conversations with Board members since the meeting.

CCRA was formed in 2006 to lead the redevelopment of downtown Vancouver and is a separately chartered public agency under Washington State Law. CCRA's charter and bylaws state that the Board shall "…undertake, assist with and otherwise facilitate the redevelopment of property within the Vancouver City Center Vision ("VCCV") plan area." The CCRA charter grants the organization broad powers to achieve the redevelopment goals for downtown including the authority to acquire and sell property and initiate public private partnerships to undertake redevelopment projects.

Since the formation of CCRA in 2006, **downtown Vancouver has been transformed and attracted billions in new private investment.** CCRA has played an active role in this transformation through both advocacy and by serving as the lead public partner in strategic redevelopment sites such as Waterfront Gateway. CCRA will play an expanded role in downtown redevelopment in the future, particularly with high opportunity sites such as Library Square.

Toward that end, CCRA has begun planning for the next wave of downtown development by commissioning a Downtown Redevelopment Study ("Study") that will identify the high opportunity areas for future development that will catalyze the necessary investment to continue downtown Vancouver's transformation into a dense, walkable and accessible urban center. That study is explicitly incorporating in its analysis the current plans for a new bridge to help CCRA understand the redevelopment potential of the areas impacted by the IBR project, and its early findings inform our feedback in this memo.

CCRA feedback on the Draft SEIS focuses on three specific areas as described below: **Park and Ride, Urban Design and Traffic Impacts.**

Park and Ride

While the CCRA Board understands that Park and Ride facilities are often located near transit termini, the Board has always believed that **the location of Park and Ride facilities downtown runs counter to both best practices in real estate development and thoughtful transportation planning**. Park and Ride facilities in urban centers occupy valuable real estate that could provide more public benefit through housing and office development. In addition, the City's parking and transportation planning prioritizes improving mode split to and within downtown so the presence of additional public parking facilities that could induce more car trips will only make this work more challenging.

The City is nearing completion a new Downtown Parking Plan that includes an inventory of existing parking and will establish a plan for managing future growth downtown without increasing the public parking supply. The findings from that plan indicate that downtown has 14,000 parking spaces, most of which are significantly underutilized. A key conclusion from those findings is that the elements exist to implement a shared parking system throughout downtown that can meet the needs of existing and future users, including those who park downtown to access light rail. Because implementation of the new plan calls for the City to organize shared parking agreements with downtown property owners to unlock more the existing parking supply for public use, the CCRA Board is confident that a dispersed parking alternative will be available to meet the needs of anticipated park and ride users and therefore **requests that downtown Vancouver be spared from the addition of any new park and ride facilities**.

In the event the above request is not honored, the CCRA Board strongly advocates that the location and requirements for new Park and Ride facilities in downtown meet the criteria below:

- Avoid utilizing or constraining high opportunity redevelopment sites, including Waterfront Gateway and Library Square. These sites have already been identified in the Study as two of the last remaining opportunities for large mixed-use development with the potential for catalyzing further private development.
- Require that any new park and ride garage operate as a shared use facility that serves as many different types of parking users as possible. A shared use facility could minimize the impact on downtown by eliminating the need for new parking associated with development or to support retail.
- Employ pricing strategies that complement the City's demand driven pricing designed to discourage long term parking, increase turnover and encourage use of alternate forms of transportation.
- Utilize thoughtful urban design to maintain the human scale and pedestrian friendly feel of downtown Vancouver. Poorly designed parking structures near transit stations can hinder access for walking, biking and other alternative forms of mobility.

Urban Design

The construction of a new bridge will dramatically alter the environment near the I-5 roadway in downtown Vancouver. The new bridge and adjacent roadway will also create new spaces with the potential to add or detract from the human experience downtown. The CCRA Board is not alone in asking for the IBR to take great care in the design of new underpasses and other public spaces near highway infrastructure to create safe and inviting environments for people on foot, bike or other non-motorized transportation.

Spaces under freeways have historically been neglected wastelands viewed by the public as unsafe and detracting from the urban fabric. To counter this, communities across the US have employed innovative solutions to design and activate these historically uninviting spaces. The Board urges the IBR team to seek out best practices in designing, managing and activating these practices and include these recommendations in the final project design.

In addition to thoughtful design, governance of these spaces will also determine how they are activated and utilized. The CCRA Board advocates for local control of these new spaces and ongoing funding to allow for active management that is coordinated with other downtown uses and activities.

Traffic Impact

The CCRA Board remains concerned that the **IBR project will impact traffic patterns in a manner that negatively impacts downtown Vancouver**. In particular, we are concerned that the loss of one or both of the C Street Ramps will divert additional car traffic through downtown seeking access to I-5. While the Board appreciates the challenges associated with accommodating existing I-5 access in the new design, they do not believe that an appropriate tradeoff is to flood downtown Vancouver with additional traffic with no intention of stopping within downtown. Maintaining the existing access to downtown from I-5 is the best option for supporting for the future vision for downtown Vancouver.

The CCRA Board appreciates the opportunity to provide this feedback and strongly supports the IBR project and the transformative impact the project will have on Vancouver and SW Washington. The project is vital to the resilience of our transportation system, the economic future of our region, and Vancouver's emergence as a driver of growth for the State of Washington. The Board hopes that extreme care is taken in the planning and implementation of this project to protect the integrity of downtown Vancouver from the meaningless traffic, lifeless structures and unwelcoming spaces that have resulted from similar projects. The Board is committed to remaining engaged with the IBR team to help ensure that this project delivers the promised benefits for Vancouver and the region.

Attachment D: Administrative Comments by Chapter/Report (spreadsheet)

Item	Department / Division	Chapter/report	Section #	Page #	Figure/ Table #	Comment
1	FIRE	2. Description of Alternatives	2.2.3 Columbia River Bridges (Subarea B), Double-Deck Fixed-Span Configuration	26	Figure 2-16	NFPA 502: Standard for Road Tunnels, Br construction on a lower deck creates limite standards. •Open-truss construction on a lower deck referenced standards. •During construction, repair, alteration or d •Bridges and elevated highways over 1000 •Closed-circuit television systems are requ •On limited access highways drainage sys flammable liquids, and shall be designed t •Standpipes for fire protection shall be inst exceeds 1000 feet. •Hose connection design shall comply with •Where emergency communications are ir •Enclosed highway reflective or lighted dir at a distance of no more than 82 feet. •Products of combustion such as heat, sm control provisions shall be in accordance w •Electrical systems shall support life safety •Where required exit signs shall be externa •For enclosed road tunnels, emergency ar 502. Emergency lighting shall be connecte •Wiring in manholes shall be protected fro and locking capabilities. •A hazard analysis will be required for vari involving large vehicle fire loads and lithiur The following incidents shall be considered (1) Fire or a smoke condition in one or mor (2) Fire or a smoke condition adjoining or a (3) Collision involving one or more vehicles (4) Loss of electric power that results in los (5) Rescue and evacuation of motorists un
2	PW - Transportation	3.1 Transportation	3.1.3 Long-Term Effects, Safety in 2045, Modified LPA	43		Section 3.1-page 43 paragraph 5. The doc predicted to reduce the total crashes by 13 Interstate Bridge Openings and Gate Closu directions are approximately 2 times more going to further reduce the crash frequency capacity constraints. Confirm that the impr
3	CDD	3.1 Transportation	3.1.3 Long-term effects, Bottle Necks & Speeds 2045, Modified LPA without C Street Ramps	27		I thought that there was also some conges congestion. Would there be NB congestion
4	CDD	3.1 Transportation	3.1.3 Long-term effects, Transit in 2045, Transit Travel Time	35		Wouldn't the movable bridge span option r during the AM and PM peak hours?
5	CDD	3.1 Transportation	3.1.3 Long-term effects, TDM and TSM in 2045	44		"New and improved bicycle and pedestrian time." Not only would there physically be m of users/skill sets compared to the no build
6	PW - Transportation	3.1 Transportation	3.1.6 Potential Avoidance, Minimization, and Mitigation Measures, Modified LPA Without C Street Ramps	52		Section 3.1 Page 52. "Modified LPA withou of the six failing intersections not provided. were implemented the concurrency corrido
7	PW - Transportation	3.1 Transportation	3.1.3 Long-Term Effects, I-5/I-205 Travel Forecasts in 2045	21	Table 3.1-11	Section 3.1-page 21 Table 3.1.11 states th further down (page 22, last paragraph), it s compared to no build. The two statements would be 3% lower as compared to the No
8	PW - Stormwater	3.16 Ecosystems	3.16.4 Temporary Effects, Modified LPA, Aquatic Resources, In-Water Work Timing	29		In-Water Work Timing, second bullet. Is thi two days.
9	PW - Surface Water	3.17 Geology & Groundwater	3.17.2 Existing Conditions, Groundwater Resources	4		Text references only Special Protection Ar overlapping designated Wellhead Protectio
10	CMO	3.19 Climate Change	3.19.1 Changes or New Information Since 2013	3	Table 3.19-1	This project needs to add another metric fo modified by this project). The current meas a consistent geography - if VMT change is VMT relative to the existing facility).
11	CMO	3.19 Climate Change	3.19.1 Changes or New Information Since 2013	3		Note if induced demand and vehicle electri confusing to the reader.
12	CMO	3.19 Climate Change	3.19-1			This section should include mention of the
13	CMO	3.19 Climate Change	3.19-1		Table 3.19-1	The difference between the construction e depth explanation than referencing a "char
14	EPH	3.3 Property Acquisitions and Displacement	3.3.3 Long-Term Benefits and Effects, Modified LPA	10		"(Site 1) would make use of an existing pa adjacent to the Vancouver Community Libr surface parking.

Attachment D

Item	Department / Division	Chapter/report	Section #	Page #	Figure/ Table #	Comment
15	CDD	3.4 Land Use and Economic Activity	3.4.3 Long-Term Benefits and Effects, Modified LPA, Business Displacements, Property Tax Impacts	31		Potential typo- "Waterfront Site 3 is owned impact." This should say Site 2 right?
16	CDD	3.4 Land Use and Economic Activity	3.4.3 Long-Term Benefits and Effects, No Build Alternative, Land Use	17	Table 3.4-6	Typo - should say "Site 2: Additional 0.1 ac
17	CDD	3.6 Public Service & Utilities	3.6.2 Existing Conditions, Public Services	4	Figure 3.6-2	Think Hudson Bay High School should be
18	PW	3.6 Public Service & Utilities	3.6.2 Existing Conditions, Utilities	6	Table 3.6-4	Does Lumen have infrastructure in the stu another group.
19	CDD	Acquisitions Report	4.3.4			Clarify where exactly the additional 0.2 acr
20	CDD	Acquisitions Technical Report	4.3.4.2 Design Options, Park and Rides	4-8 (93 of 138)		Statements about Hayden Island inapprop difficult to relocate based on location and/c patronage and may be difficult to reestablis waterfront location. Floating homes may al
21	CDD	Acquisitions Technical Report	4.3.4.2 Design Options, Park and Rides		Tables 4-5 and 4-6	The identifiers in Tables 4-5 and 4-6 do no 2b. Final SEIS should use consistent desc
22	CDD	Acquisitions Technical Report	Appendix			The IBR ID #38470012 is listed many time
23	CMO - Climate	Air Quality	3.10.3 Long-Term Effects	3.10-10	Table 3.10-4 and 3.10-5	In the tables, note what the federally/state green/yellow/red to provide reader witth sc Data without context is not helpful for the r
24	CMO - Climate	Air Quality	3.10.3 Long-Term Effects	3.10-12		Include additional context about impacts ar doesn't not explain if there are any benefits impacts should also be included in this cha
25	CMO - Climate	Air Quality	3.10.6 Potential Avoidance, Minimization, and Mitigation Measures	3.10-14		Should proposed mitigation measures be i
26	CMO - Climate	Air Quality				The SEIS assumes significant decreases i those federal regulations will be maintaine
27	CMO - Climate	Air Quality	3.10.4 Temporary Effects	3.10-13		The Exec Summary says that potential off- clear in the context of air quality.
28	EPH	ALL				Revise to read that up to 2 park and rides
29	CDD	All reports / chapters (especially EJ)	general			Be clear when the analysis is referring to th
30	**CDD**	**Climate Change technical report**	**7 and 8**			**Explain how decisions will be made abo**
31	CDD	Cumulative Effects report	3.12.2 Effects from Past, Present, and Reasonably Foreseeable Future Actions	3-33 (118 of 168)		The discussion on cumulative effects to Va
32	CDD	Environmental Justice Technical Report	2.3.1 EJ Secondary Study Area	2-8 (81 of 202)	Figure 2-1	Since this chapter is focused on EJ commu which sections of the secondary study area
33	CDD	Environmental Justice Technical Report	2.5.2.1 Initial Community Engagement (2020-2021)	2-13 (86 of 202)		Says "Four community-specific listening se Should this say November 2021?
34	CDD	Environmental Justice Technical Report	3.2.1 Minority Populations	3-9 (107 of 202)		Instead of saying "Comparing block groups population" it would be more accurate to sa Vancouver." Since the table is not compari
35	CDD	Environmental Justice Technical Report	3.2.2.1 Meaningfully Greater and High-Priority Low-Income Areas	3-17 (116 of 202)		"Additional analysis was done to assess b Vancouver region as a whole." This should
36	CDD	Environmental Justice Technical Report	3.2.2.1 Meaningfully Greater and High-Priority Low-Income Areas	3-17 (116 of 202)		"The following sections describe low-incom to low-income populations within the study
37	CDD	Environmental Justice Technical Report	3.2.2.2 Low-Income Housing	3-19 (118 of 202)		"A number of subsidized housing units, pu Figure 3-7, there are no low-income housi within the Vancouver portions of the study populations in this report therefore conside more within the EJ Secondary Study Area. north side of Fourth Plain west of I-5) appe one of the two EJ thresholds.
38	CDD	Environmental Justice Technical Report	3.2.2.2 Low-Income Housing	3-19 (118 of 202)		Double check the locations of the housing Fourth Plain.
39	CDD	Environmental Justice Technical Report	2.2.1 Minority Populations	2-5 (78 of 202)		Bullet with American Indian and Alaska Na
40	CDD	Environmental Justice Technical Report	2.2.1 Minority Populations	2-5 (78 of 202)		Should be 'Black or African American', not
41	CDD	Environmental Justice Technical Report	2.4.3 Community Resource Mapping	2-9 (83 of 202)		Add 'community based organizations and s
42	CDD	Environmental Justice Technical Report	2.6.1 Long-Term Impact Assessment Methods	2-21 (94 of 202)		The description of this section is 'long-term property acquisitions (short-term) and not l Effects section discusses indirect displace
43	CDD	Environmental Justice Technical Report	2.5.2.1 Initial Community Engagement (2020-2021)	2-13 (86 of 202)	Table 2-2	Why are Youth and Low-Income Populatio
44	CDD	Environmental Justice Technical Report	3.2.3 Neighborhood Characteristics	3-27 (126 of 202)	Table 3-19	Technically this table also includes a coupl Gresham and Portland neighborhoods are Given that Rockwood is an EJ priority area the analysis includes their neighborhood.

Item	Department / Division	Chapter/report	Section #	Page #	Figure/ Table #	Comment
45	CDD	Environmental Justice Technical Report			Table 3-20	Listing Regal Cinema as a community reso mainline, the shifting the I-5 mainline west would be displaced, and **the Regal City C** living in these units. However, these displa Apartments are located at the edge of the **considered community resources**, make
46	CDD	Environmental Justice Technical Report			Table 4-3	Column 3 (Impact Specific to Minority and Westward shift design option twice. Replac third EJ area in Vancouver.
47	CDD	Environmental Justice Technical Report			Table 4-3	Acknowledge potential impact to Esther Sh Economics section. This land use would ha intent for Downtown to be a pedestrian-orie
48	CDD	Environmental Justice Technical Report			Table 4-3	The Transportation row in the table says "(neighborhood, a high-priority EJ area" and transit station..." Section 4.4.2 (Transit Imp high-priority EJ area." Correct these sente
49	CDD	Environmental Justice Technical Report	4.4.3		Table 4-3	Other benefits to EJ populations that could to the pathway to Old Apple Tree Park and and other resources for Esther Short, Arna transportation trips - modes that lower-inco EJ populations living along the Vine routes such as Fourth Plain Village. Given how im ridership among EJ pops, this is an importa
50	CDD	Environmental Justice Technical Report			Table 4-3	How would the No C Street Ramps design on local streets? It seems there could be a
51	CDD	Environmental Justice Technical Report	4.2, 4.3, 4.4		Table 4-3	Table 4-3 summarizes the impacts from th 4.3 Displacements and Community Resou Traffic Impacts does not discuss the No C
52	CDD	Environmental Justice Technical Report			Tables 3-19 and 3-20	To be consistent with the "No Thresholds" within and outside of EJ focus areas acces
53	CDD	Environmental Justice Technical Report	4.3	4-21		Acknowledge minor, temporary impacts to
54	CDD	Environmental Justice Technical Report	4.2			The finding for the No Build Alternative is i
55	CDD	Environmental Justice Technical Report	4.2			"The Yellow Line extension would operate implies that the transit guideway will have s
56	CDD	Environmental Justice Technical Report	4.4.3			Acknowledge benefits to Arnada from activ overcrossings of I-5 at 29th Street and 33r
57	CDD	Environmental Justice Technical Report		4-38		"Esther Short has a high-priority percentag Portland-Vancouver region (Table 3-20)." I analysis does not apply the thresholds to i
58	CDD	Environmental Justice Technical Report	6.2 Indirect Effects	6-2		"Other indirect effects could include increa Village, which have been identified as high and findings summarized in earlier section high-priority EJ areas within the study area for low-income, and Rose Village is a "mea should be added to this list.
59	CDD	Environmental Justice Technical Report	7.1.1.2 Mitigation for Long-term Noise Impacts	7-2		"Noise impacts in the Rose Village neighbo Street and SR 500. Noise Wall 4 would rep overcrossing and would continue along the correcting the noise impacts to Rose Villag east side of I-5 (in Rose Village), wall 8 wo impacts mentioned in 4.6 - including Noise
60	CDD	Equity Technical Report	6. Indirect Effects	6-2 (95 of 115)	Figure 6-1	This should reference the City's Equity Ind displacement risk that takes into account h
61	CDD	Equity Technical Report		5-3	Table 5-1	The bullet for "33 multifamily units displace
62	CDD	Equity Technical Report	5.1.1 Houseless Populations	5-5 (92 of 115)	Table 5-2	Title says 'Multnomah County Houseless P
63	CDD	Equity Technical Report	4.2	4-7		"A Community Connector (wide pedestrian it's more than that. Update this to reflect th
64	CDD	Equity Technical Report	4.1.1			Why was 45 minutes chosen for the HCT T peak period? I imagine that many people a viable alternative.
65	CDD	Equity Technical Report	7.1.2 and 8			Add "align new infrastructure with commun community benefits provided in the "Synop

Item	Department / Division	Chapter/report	Section #	Page #	Figure/ Table #	Comment
66	CDD	Equity Technical Report	4.3.3 Other Highway and Driving Equity Considerations			"Numerous studies have found that BIPOC injuries and fatalities... While the extent of relevant. As the IBR Program moves forwa Wouldn't this lead to the finding that there
67	**CDD**	**Equity Technical Report**	**4.1 High Capacity Transit**			**Describe further how/why access to job**
68	**CDD**	**Equity Technical Report**	**8. Synopsis**			**Add further detail about Clark College a today). Also discuss current IBR/C-TRA rail options.**
69	CDD	Executive Summary				Update Table 2 in the Executive Summary the fixed span options. Column 7 says "Sa which does not align with the discussion in
70	CDD	Land Use report	4.3.15			4.3.15 Park-and-Ride Integration with the U Plan - not a standalone section.
71	CDD - Dev Review	Land Use Technical Report	3.5.4 City of Vancouver Overlay Districts	3-61 (140 of 193)	Figure 3-19	Correct the Historic Preservation Overlay a
72	CDD - Dev Review	Land Use Technical Report	3.3.2 Recent and Pending Development	3-10 (89 of 193)		Add 2009 approval of the Vancouver Wate
73	CDD - Dev Review	Land Use Technical Report	3.3.2 Recent and Pending Development	3-10 (89 of 193)		The City is holding a pre-application for 10
74	CDD - Dev Review	Land Use Technical Report	3.3.2 Recent and Pending Development	3-10 (89 of 193)		Address should be 210 W 3rd Street (not 2
75	CDD - Dev Review	Land Use Technical Report	3.3.2 Recent and Pending Development	3-11 (90 of 193)		The Hyatt Place project should be removed 10 of the report.
76	CDD - Dev Review	Land Use Technical Report	3.3.2 Recent and Pending Development	3-11 (90 of 193)		Add to list of projects: Kirkland Renaissanc 115,000 square feet of commercial space t
77	CDD	Land Use Technical Report	4.2.2.1 Park and Rides	4-15 (159 of 193)		Incorrectly states "Two multistory park-and and one in the vicinity of the Evergreen Sta should not say "built" because one of the c correct project description for park and ride
78	CDD	Land Use Technical Report	9. Permits, Plans and Approvals	9-1 (186 of 193)		Includes discussion on the Clark Park and
79	CDD	Land Use Technical Report	7.2.3 Park and Rides	7-2 (184 of 193)		Mitigation measures aren't really mitigation Square or Waterfront Gateway would work any new structure.
80	CDD	Navigation Report	1.4 Purpose of this Report	1-3		The second paragraph in this section is co Environmental Impact Statement (EIS) to r determination is expected to occur prior the Final SEIS? Update this section to be clea
81	CMO	Neighborhoods	2.5.4	2-8		Elaborate on how information from the Cor
82	CMO	Neighborhoods and Populations Technical Report	4.4.10.1 Displacements and Property Impacts	4-14 (146 of 162)		Line 33 states "No residencies would be di residental units would be displaced". Clarif
83	CMO	Neighborhoods and Populations Technical Report	5.3 Washington Temporary Effects	5-3 (153 of 162)		In the Neighborhoods and Equity Existing C easements would not adversely affect neig neighborhood seems to have significant qu for the duration of construction. Reconcile
84	CMO	Neighborhoods and Populations Technical Report	2.6 Analysis Methods Approach	2-13 (83 of 162)	Table 2-2	How has information from the Community data sources in Table 2.2, page 2-13 (with which is vague)
85	CMO	Neighborhoods and Populations Technical Report	3.4 Description of Relevant Neighborhood Plan Goals for Portland and Vancouver	3-45 (132 of 162)	Table 3-47	How has the age of Neighborhood Action I updating theirs this year.
86	CDD	Noise and Vibration Technical Report			Table 7-3	Table 7-3 shows 12 single-family units at r describes the receptor as Normandy Apart be impacted, then clarify why. Otherwise, u any of the findings?
87	CDD	Noise and Vibration Technical Report	7.7.1.4			Summary list of recommended noise walls Mitigation Summary. It should be labeled a
88	**CDD**	**Noise and Vibration Technical Report**	**7. Potential Mitigation**			**Please coordinate with City staff about determined that noise walls are not reas**
89	CDD	Parks and Recreation Technical Report	3.6.4 National Park Service	3-16 (91of 148)		Just to note (not necessarily to change): "T City is not actively pursuing this overpass - with the Reserve.
90	PW - Transportation	Transportation Technical Report	1.1.4 Downtown Vancouver (Subarea C)	1-41 (61 of 1,121)	Fig 1-23	Figure shows one of the proposed park an Convention Center expansion.
91	PW - Transportation	Transportation Technical Report	3.6.1 Roadway Network	3-51 (129 of 1,121)	Table 3-13	SE Columbia Shores Blvd has sidewalks o
92	PW - Transportation	Transportation Technical Report	3.7.1.1 Regional and Local Transit Service	3-80 (158 of 1,121)	Table 3-25	The Vine entry appears to only acknowled
93	CDD	Transportation Technical Report	3.8.2 Active Transportation Facilities in the City of Vancouver	3-95 (173 of 1,121)	Table 3-30	29th Street is an overcrossing, not an unde

Attachment D

Item	Department / Division	Chapter/report	Section #	Page #	Figure/ Table #	Comment
94	PW - Transportation	Transportation Technical Report	4.8.1.2 Active Transportation Facilities in the City of Vancouver	4-127 (351 of 1,121)	Table 4-45	I'm not aware of a RTC RTP project to con project completed in 2022. Clarify which pr Metro/RTC Financially Constrained RTP 2
95	CDD	Transportation Technical Report	4.8.1.2 Active Transportation Facilities in the City of Vancouver	4-128 (352 of 1,121)	Table 4-46	29th Street is an overcrossing, not an unde
96	CDD	Transportation Technical Report	4.8.2.3 Active Transportation Facilities in the City of Vancouver	4-138 (362 of 1,121)	Table 4-51	33rd Street has narrow curb-tight sidewalk landscaping.
97	CDD	Transportation Technical Report	4.8.2.3 Active Transportation Facilities in the City of Vancouver	4-142 (366 of 1,121)	Table 4-52	For E 29th Street, we may end up recomm
98	PW - Transportation	Transportation Technical Report	3.1 Introduction	3-1 (79 of 1,121)		Last two sentences on Page 3-1 and first f
99	PW - Transportation	Transportation Technical Report	3.10.2.2 Facility Management System, Transit Priority at Traffic Signals	3-145 (223 of 1,121)		OR 99 corridor should be Main Street/Hwy
100	PW - Utilities	Utilities Technical Report	3.3 Existing Utilities - Washington	3-7 (79 of 102)	Figures 3-2 & 3-3	The 3 mains you've called out and shown a ranging from 6" to 12". Not sure what your
101	PW - Utilities	Utilities Technical Report	3.3.1 Water and Sanitary Sewer	3-5 (77 of 102)		Water can be fed from the east. Revise las
102	PW - Utilities	Utilities Technical Report	3.3.1 Water and Sanitary Sewer	3-5 (77 of 102)		There is a sewer lift station located in ROV should be mentioned on page 3-5 as well.
103	PW - Utilities	Utilities Technical Report	3.3.1 Water and Sanitary Sewer	3-5 (77 of 102)		The water line in Columbia Way is mention should be mentioned as well
104	FIRE	Utilities Technical Report				Notify emergency service providers of any transport across the Columbia River. - Portland 911 Bureau of Emergency Com - Clark Regional Emergency Service Ager
105	CDD	Visual Quality technical report			All the Degree of Impact tables	The scores need more explanation. For ex 18 is closer to the bridge and the visual ch with the scores. This goes for the entire an
106	CDD	Visual Quality technical report			Visual Compatability tables	In Table 4-8, Project Materials for the Dow anticipated to be consistent with **design re** across the entire Modified LPA for element Similar statement for Columbia River LU b mentioned in some but not all of the LUs?
107	CDD	Visual Quality technical report	3.2.4.1			This section is missing a conclusion about
108	CDD	Visual Quality technical report	4.2.2.1			"Material, color selection, and textures wou with design recommendations, local design Urban Design Committee" in this report. W
109	CDD	Visual Quality technical report	4.2.3	4-29		"This location is currently a gateway into th The Academy), past the City Center 12 cin
110	CDD	Visual Quality technical report	4.2.3	4-30		"A lid over I-5 (the Community Connector) Community Connector would be completed Project Description (Chapter 1)." Why does TBD. The RCP grant assumes that IBR wo the top of lid. It's unneccasry to say report as that applies to everything.
111	CDD	Visual Quality technical report		4-29		"and a tie-in to the planned City of Vancou Boulevard and Fort Vancouver Way Safety
112	CDD	Visual Quality technical report	4.2.4.3	4-51		"New cultural elements, such as unified de this finding for the Greater Central Park LU acknowledges: "The visual character of the of the existing Interstate Bridge and lift tow
113	CDD	Visual technical report	4.2.2.4			Change the degree of impact for KVP 19 to change from existing conditions. The conc the waterfront would be highly visible to tra
114	PW - Surface Water	Water Quality and Hydrology Technical Report	2.2.3.2 City of Vancouver	2-9 (80 of 150)		City of Vancouver Surface Water requires
115	PW - Surface Water	Water Quality and Hydrology Technical Report	3.2.5 Storm Drainage	3-7 (93 of 150)		The report indicates an additional wetpond additional wetpond, and it appears there is
116	PW - Surface Water	Wetlands and Other Waters	3.15.2 Existing Conditions, Wetlands in Washington	6		First paragraph states that Wetland B and due to the scale of the map image. Good t corresponding technical document.

This page includes staff comments that were incorporated into the letter, for reference only. There is no need to respond to these comments in addition to those made in the letter.

Item	Department / Division	Chapter/report	Section #	Page #	Figure/ Table #	Comment
1	EPH	3.1 Transportation	3.1.3 Long-Term Effects, Active Transportation in 2045, Modified LPA	42	N/A	We should support an active transit
2	PW - Transportation	3.1 Transportation	3.1.3 Long-Term Effects, Arterials and Local Streets in 2045, Intersection Operations	34	N/A	The documents states “The park an LPA under any design options”. Pag and 700 spaces for the evergreen s churches and other unaffiliated part 69 technical report) that half of the a attract more then 650 trips during th downtown roadway network.
3	PW - Transportation	3.1 Transportation	3.1.4 Temporary Effects, Arterials and Local Streets	47	N/A	Section 3.1-page 47 paragraph 2. T Heavy truck traffic over local roadwa
4	PW - Transportation	3.1 Transportation	3.1.6 Potential Avoidance, Minimization, and Mitigation Measures, Long-term effects, Program-Specific Mitigation	51	N/A	Section 3.1 page 51 paragraph 2. T and last approximately 4 hours”. Th on the C-D system can in-turn cause for Vancouver.
5	CDD	3.1 Transportation	3.1.2 Existing Conditions, Arterial and Local Street Network and Intersection Operations	14	Table 3.1-7	For the intersections that are failing
6	CDD	3.1 Transportation	3.1.2 Existing Conditions, Transit	15	N/A	Another Vine BRT line (Hwy 99) will modeling? Opening date is 2027.
7	CDD	3.1 Transportation	3.1.3 Long-Term Effects, Arterials and Local Streets in 2045, Intersection Operations	34	N/A	Report says "The park-and-ride opti under any of the design options." - D or that there is no discernible differe impact area study intersections?
8	CDD	3.1 Transportation	3.1.4 Temporary Effects, Active Transportation	47	N/A	Need to make sure that closures/an
9	EPH	3.11 Noise and Vibration			N/A	A larger lid at library square would c
10	PW - Surface Water	3.17 Geology & Groundwater	3.17.2 Existing Conditions, Geologic Hazards	3	N/A	around the 500 interchange, in the s
11	PW - Surface Water	3.17 Geology & Groundwater	3.17.2 Existing Conditions, Groundwater Quality	4	N/A	COV has violated SDWA standards blending will address these but the s shallower and more abundant will m as well as potential shifts in groundw
12	PW - Surface Water	3.17 Geology & Groundwater	3.17.2 Existing Conditions, Groundwater Quality	4	N/A	Safe Drinking Water Act monitoring Vancouver SDWA monitoring is a ch data report showing personal care p septic systems. Infiltration in the IBR potentially mobilizing contaminants
13	CMO	3.19 Climate Change	3.19.1 Changes or New Information Since 2013	2	N/A	Reference to Vancouver's Climate A 2030.
14	CMO	3.19 Climate Change	3.19 Climate Change	1	N/A	This intro makes no mention of the l automobiles and freight, as well as l driving GHGs. This is a critical point must be made.
15	CMO	3.19 Climate Change	3.19 Climate Change	1	N/A	This section should include mention
16	CMO	3.19 Climate Change	3.19.3 Designing for Resilience in a Changing Climate, Other Climatic Factors, Wildfire Risk	6	N/A	Shoud include wildfire smoke's impa
17	EPH	3.3 Property Acquisitions and Displacement	3.3.3 Long-Term Benefits and Effects, Modified LPA	6	Figure 3.3-3	Why are the western most parcels c potential park site and those adjace
18	EPH	3.4 Land Use and Economic Activity	3.4.3 Long-Term Benefits and Effects, Modified LPA, Land Use, Washington	19	N/A	Park and ride facilities would conflic
19	EPH	3.4 Land Use and Economic Activity	3.4.3 Long-Term Benefits and Effects, Modified LPA, Business Displacements	31	Table 3.4-11	Per page 2-11 in the IBR SDEIS Ec data from the results of the latest re employees would be displaced from Economic Activity section of the DS current open spaces within them, sc
20	CMO - Climate	Air Quality	3.10.6 Potential Avoidance, Minimization, and Mitigation Measures	3.10-15		Is "encourage" strong enough wordi REQUIRE going above the baseline sides of the river.
21	CMO - Climate	Air Quality				Suggest adding a more explicit disc benchmarks or standards. It follows
22	CMO - Climate	Air Quality				How will IBR project monitor air qua particularly paths located alongside with close proximity and total, unfilte hazards associated with their travel. being located extremely close to tra

This page includes staff comments that were incorporated into the letter, for reference only. There is no need to respond to these comments in addition to those made in the letter.

Item	Department / Division	Chapter/report	Section #	Page #	Figure/ Table #	Comment
23	CMO - Climate	Air Quality				The Air Quality chapter needs to inc transportation is a significant contrib respiratory, cardiovascular, neurode p. 3)
24	CMO - Climate	Air Quality report				After the explanation of what the mo out as expected. What plans does th construction or operation of the brid and they turn out to be wrong?" The mitigation measures are carried out SEIS?
25	CDD	Chapter 4 - 4(f)	Overall			Per 4f determination criteria, De mir and construction shall be confined t use path and potential extension of any tree root impact with the path ar
26	CDD	Chapter 4 - 4(f)	Overall			Per 4f determination criteria, De mir discussion with staff about permane agreed to by City. Ensure that Mayo
27	PW	Climate Change Technical Report	3.3 Climate and Equity Considerations	3-3 (97 of 201)	N/A	top of page, include language regar
28	PW	Climate Change Technical Report	6.1 Design Considerations	6-1 (129 of 201)	N/A	6.1 include language regarding utiliz
29	PW	Ecosystems Technical Report	7.2.1.3 Site Erosion/Sediment Control Measures	7-4 (245 of 266)	N/A	Add language regarding planting qu State. Also include language of erad blackberry and replanting native or
30	CDD	Environmental Justice Technical Report			Table 4-3	The Noise row incorrectly states tha substantial impact would be west of impacts from traffic and LRT in Arna
31	CDD	Environmental Justice Technical Report	4.6			Update this section to reflect the pre Rose Village. The Noise Report disc impacts from LRT and vibration nois disproportionate impacts to EJ popu Noise Exposure Chart (refer to Nois
32	CDD	Environmental Justice Technical Report	4.7.2			"Because low-income populations te reliability would contribute to offsetti section in 3.1.2 (Travel Characterist Equity reports.
33	CDD	Environmental Justice Technical Report	7.2.2 Mitigation for Temporary Transportation Impacts			Recommend the additional mitigatio Hotline to call an on-demand servic
34	CDD	Environmental Justice Technical Report	7.2.2 Mitigation for Temporary Transportation Impacts			"Disruptions to peak period and day construction activities during nighttir consequence of disproportionately a women and people of color are mor https://pmc.ncbi.nlm.nih.gov/articles
35	CDD	Environmental Justice Technical Report	6.2 Indirect Effects	6-2		"If low-income renters were forced t effects." Off to say "could" in this se
36	CDD	Environmental Justice Technical Report	6.2 Indirect Effects	6-2		The City also has housing-supportiv
37	CDD	Environmental Justice Technical Report	3.1.2			The EJ and Equity reports note seve Equity report notes how BIPOC indi 3.1.2 of the Environmental Justice r populations. Refer back to this secti
38	CDD	Environmental Justice Technical Report	6.2 Modified LPA	6-2 (184 of 202)	N/A	Low-income homeowners could ben still cause displacement if the home
39	CDD	Environmental Justice Technical Report	2.5.2.1 Initial Community Engagement (2020-2021)	2-12 (85 of 202)	N/A	How successful were engagement a demographic breakdown for many c
40	CDD	Equity Technical Report				Need more detail to explain the pote typically more reliant on non-auto tra such as residents of Esther Short. V wheelchair, bike, scooter, etc.?
41	PW - Transportation	Equity Technical Report	4.4 Tribal Government Consultation	4-10 (87 of 115)	N/A	The discussion regarding tribes in th communication that is happening be impacts area and how they should b had on spaces that were once occu
42	CDD	Equity Technical Report	6. Indirect Effects	6-1 (94 of 115)	N/A	Reside is cited when talking about n in 2022 should be referenced instea neighborhoods in central Vancouver
43	CDD	Equity Technical Report	4.4 Tribal Government Consultation	4-10 (87 of 115)	N/A	In general, this section feels quite va with Tribal governments and the lev

This page includes staff comments that were incorporated into the letter, for reference only. There is no need to respond to these comments in addition to those made in the letter.

Item	Department / Division	Chapter/report	Section #	Page #	Figure/ Table #	Comment
44	CDD	Equity Technical Report	6. Indirect Effects	6-1 (94 of 115)	N/A	I think mention of HCT alignment - p presense of equity priority areas and Proximity to LRT stops could lead to
45	EPH	Land Use Technical Report	4.2.2.1 Park and Rides	4-18 (162 of 193)	N/A	The section states that there are 3 is development is not included in this a land use of downtown and should be
46	EPH	Land Use Technical Report	4.3.15 Park-and-Ride Integration with the Urban Environment	4-27 (162 of 193)	N/A	Park and rides are not consistent wi required to recieve federal funding. urban form and surounding uses
47	EPH	Land Use Technical Report	4.2.2.1 Park and Rides	4-16 (160 of 193)	Figure 4.6	Remove P&R location 3 from report
48	CMO	Neighborhoods and Populations Technical Report	1.2 Modified LPA Construction	1-54 (67 of 162)	N/A	Both commissions have supported t disabled, specifically those with chro them?
49	CMO	Neighborhoods and Populations Technical Report	4.4.10.1 Displacements and Property Impacts	4-15 (147 of 162)	N/A	The Evergreen Inn is anticipated to any mitigation options? What benefi
50	CMO	Neighborhoods and Populations Technical Report	4.4.10.1 Displacements and Property Impacts	4-16 (148 of 162)	N/A	Traffic impacts on neighborhood col
51	CMO	Neighborhoods and Populations Technical Report	4.4.2 Overview of Effects on Vancouver Neighborhoods	4-9 (141 of 162)	Table 4-2	Shumway and Lincoln are absent fr
52	PW	Parks and Recreation Technical Report	4.2.11 Old Apple Tree Park	4-15 & 4-16 (107 & 108 of 148)	Figure 4-6	Old Apple Tree Park. The central ar the new path would enter from the S vs cutting through the ctern of the op path to grade, perhaps a circular loo *comments from 4(f) chapter as well*
53	CDD	Transportation Technical Report	4.6.4 Intersection Operations	4-70 (294 of 1,121)		The report concludes that "The park potential park-and-ride sites would h look at scenarios with one or no par description of the MLPA in the meth adequately understand the potential Library Square site would mean tha users of the Library and future deve carefully managed.
54	CDD	Transportation Technical Report	General			The Draft SEIS should evaluate the the existing supply of parking Down spaces constructed.
55	CDD	Transportation Technical Report	4.10 Transportation Demand Management and Transportation System Management	4-162	N/A	The modified LPA speaks to the phy programs as a part of the modified L education, encouragement, commu
56	PW - Transportation	Transportation Technical Report	4.6.4.2 Subarea 2: Mill Plain Boulevard, Impacts Common to all potential park-and-ride sites	4-82 (306 of 1,121)	Table 4-28	LOS F at multiple intersections with
57	PW - Transportation	Transportation Technical Report	4.6.4.2 Subarea 2: Mill Plain Boulevard, Impacts Common to all potential park-and-ride sites	4-83 (307 of 1,121)	Table 4-29	LOS F at multiple intersections with
58	PW - Transportation	Transportation Technical Report	1.1.5.1 Highways, Interchanges, and Local Roadways	1-44 (64 of 1,121)	N/A	Elimination of the WB SR-500 to Fo Johns interchange and the city stree
59	PW - Transportation	Transportation Technical Report	3.6.4.3 Subarea 3: SR 14, City Center Interchange, and Columbia Way	3-72 (150 of 1,121)	Table 3-22	LOS F at Columbia Shores/Columbi
60	PW - Transportation	Transportation Technical Report	4.6.4.1 Subarea 1: SR 500, Main Street, 39th Street, and Fourth Plain Boulevard, Impacts Common to all potential park-and-ride sites	4-74 (298 of 1,121)	Table 4-26	LOS F at Fourth Plain/Main? Which
61	PW - Transportation	Transportation Technical Report	4.6.4.1 Subarea 1: SR 500, Main Street, 39th Street, and Fourth Plain Boulevard, Impacts Common to all potential park-and-ride sites	4-75 (299 of 1,121)	Table 4-27	LOS F at Main/39th? Which leg?
62	PW - Transportation	Transportation Technical Report	4.6.4.3 Subarea 3: SR 14, City Center Interchange, and Columbia Way, Impacts Common to all potential park-and-ride sites	4-86 (310 of 1,121)	N/A	Not intuitive that there would be no i new traffic to these sites - how can t
63	PW - Transportation	Transportation Technical Report	4.6.4.3 Subarea 3: SR 14, City Center Interchange, and Columbia Way, Impacts Common to all potential park-and-ride sites	4-93 (315 of 1,121)	Table 4-31	Failing LOS at Columbia Shores/Co
64	PW - Transportation	Transportation Technical Report	1.1.4 Downtown Vancouver (Subarea C)	1-41 (61 of 1,121)	N/A	Discussion of proposed westerly shi what those changes are and what o
65	FIRE	Transportation Technical Report	5.6 Arterials and Local Streets	5-4 (399 of 1,121)	N/A	Street and road closures, even durin alternate routes should be identified

This page includes staff comments that were incorporated into the letter, for reference only. There is no need to respond to these comments in addition to those made in the letter.

Item	Department / Division	Chapter/report	Section #	Page #	Figure/ Table #	Comment
66	PW - Stormwater	Utilities	3.6.2	7-13		City of Vancouver owns stormwater that could be potentially disrupted b disruption, and should be discussed facilities, which will need to be reloc
67	PW - Utilities	Utilities				General comments that with further structures in relation to existing utilit
68	PW - Utilities	Utilities Technical Report	General			The City Stormwater Utility is not inc affected corridor. This includes over phases of construction.
69	PW - Utilities	Utilities Technical Report	5.1.2 Potential Temporary Effects – Washington	5-2 (90 of 102)	N/A	The two main crossings north and s not great, just confirming.
70	PW - Utilities	Utilities Technical Report	4.2.2 Potential Long-Term Effects – Washington	4-5 (85 of 102)	N/A	"Loss of the main could affect water flow. Loss of the main in all areas lis
71	FIRE	Utilities Technical Report	4.2.2 Potential Long-Term Effects – Washington	4-5 (85 of 102)	N/A	Multiple references state that fire flo long term, where temporary fire flow to accommodate fire flow may be re
72	PW - Stormwater	Water Quality and Hydrology	3.14.2 Existing Conditions, Stormwater	7 and 8	N/A	The existing stormwater manageme conveyance within the I-5 ROW with contributions, however the existing f the existing flows from outside of the to remain, or be relocated prior to ar
73	CMO - Climate	Air Quality	3.10.4 Temporary Effects	3.10-13		More should be added about specifi disproportionately impacted by cons be similar across all design options strategically for EJ communities and this project. It is not adequate to exc
74	CDD	Environmental Justice Technical Report	2.6.1 Long-Term Impact Assessment Methods	2-21 (94 of 202)	N/A	Archaeology should have specific m and archaeological resources?
75	CDD	Environmental Justice Technical Report	4.2, 4.3, 4.6			There are inconsistencies for how R Resources) says "Because no resid noise conditions, no disproportionat discusses the substantial noise impa between E 33rd Street and E 39th S income and minority populations. Th noise impacts to the Rose Village N Furthermore, the Noise Report show Shumway neighborhood, not the Ro 5/Mill Plain to North Vancouver Traf
76	PW - Surface Water	Water Quality and Hydrology Technical Report	3.3.2.5 Columbia River North Stormwater Watershed (Washington)	3-16 (102 of 150)		The City of Vancouver has over 400 that outfall to the Columbia River. A outfalls for future design.

Attachment E: Draft Guiding Principles for the Community Connector and the Evergreen Station Area

Desired Outcomes, based on community and stakeholder input to date

- The Connector reconnects the east and west sides of I-5, serving as an important active transportation corridor.
- The Connector provides a safe, well-maintained public space that integrates the Downtown and Historic Reserve.
- Reflect local culture, history, and the needs/aspirations of the existing community.
- Coordinate the design with the development of the transit station, Library Square site, and other surrounding uses.
- Support a new "mobility hub" within the Downtown "transit district" (with safe, convenient transfers between modes).
- Build a resilient, adaptable structure (work in a variety of weather, allow change over time).

Place-making Principles

- Integrate the design for the Evergreen Station, the Community Connector, Library Square site, the interface with the Historic Reserve, and the surrounding street network – strengthening the connection between the two sides of the freeway.
- Create an inclusive hub for Vancouver – where community members can gather and all people feel welcome and safe.
- Provide a visual and symbolic "gateway" to Vancouver and the State of Washington – utilizing iconic design.
- Celebrate the local culture of today and honor the many histories of the surrounding area and the city's people.
    - Incorporate story-telling through public art, signage, sound, interactive installations.
    - Include communities on the east side of I-5 in addition to Downtown and other neighborhoods on the west side.
    - In addition to the local culture and history, reflect the regional connectedness promoted by the IBR investments in this area.
    - Support local businesses through information, signage, programming, and partnerships.
- Provide a pedestrian-oriented corridor that aligns with 9th Street runs through the Library Square site and the Connector and supports active uses and special events.
- Design the Community Connector as a calm, inviting, family-friendly place to pass through, learn, and hang out.
    - Incorporate space for community gathering and interaction, as well as passive recreational use.
    - Provide amenities for children – complementary to the library and serving the growing Downtown population.
    - Provide scenic viewpoints.

    - Enable small events, pop-up markets, and group activities – but not necessarily large events. Plan for loading/unloading, space for tents, electricity, and acoustics.
- Explore the provision of public restrooms in this area, recognizing the increased demand from the transit station.

Transportation Principles

- Provide enhanced east-west connections for walking and small mobility modes (e.g., bikes, e-bikes, scooters).
    - Link to the surrounding sidewalk and small mobility networks.
    - Incorporate amenities that support these modes, such as a bike repair kiosk, bike rentals, wayfinding signage.
- Ensure that local bus and bus rapid transit (BRT) connections to and from the Evergreen light rail station are safe, convenient (short), and accessible to all transit riders.
- Ensure that wayfinding through the space is intuitive – with direct routes and clear sight lines to key destinations.
- Ensure that bus turning and through movements support efficient transit operations, while minimizing interference with pedestrian movement.
- Integrate the light rail platform and facilities needed to support transit operations into the space in ways that minimize conflicts with pedestrian flows and sight lines.
- Locate and design pathways to minimize grade changes as much as possible, recognizing the topography of the area and constraints associated with the transportation facilities.

Design Principles

- Design the spaces to recognize and balance the variety of user needs and to prioritize accessibility for people with disabilities.
    - Use universal design and other best practices for designing public spaces and transportation facilities – going beyond Americans with Disabilities Act (ADA) requirements where possible.
    - Consider and incorporate the detailed feedback from people with disabilities and accessibility-oriented leaders provided to the City and IBR to date – while involving this population at every stage of design and implementation moving forward.
- Strategically locate and design Transportation facilities to promote safety – separating faster moving modes from slower moving ones and gathering places.
- Use “Crime prevention through environmental design” (CPTED) principles to promote security and provide “eyes” on public spaces.
    - Activate the spaces through both design and programming (e.g., interactive installations, events, groundfloor uses on Library Square that generate foot traffic).
    - Partner with the Library, the Historic Trust, local businesses, and other nearby property owners, agencies, and community groups to program the space.

    - Strategically locate and design lighting to promote security, while minimizing unwanted spillover.
- Provide a mix of hardscape and vegetation on the Community Connector.
    - Select plants that provide aesthetic and environmental benefits (such as shading and bee habitat) – seeking creative ways to address long-term maintenance challenges.
- The space, including any landscaping, is designed to:
    - be flexible and adaptable (with evolving uses over time);
    - be cost effective to build and maintain;
    - promote environmental sustainability (low carbon materials and methods);
    - be resilient to weather events and reduce the heat island effect; and
    - provide visual, noise, and air quality buffers from the freeway and transit guideway.
- Size the Community Connector to balance the competing objectives for the space, including long-term maintenance and security considerations.
    - Prioritize functional and accessible active transportation connections.
    - Seek creative ways to use the site's challenging topography as an advantage.

Attachment F

Executive Summary: Health Analysis of the Interstate Bridge Replacement Program

Prepared by: Washington State Department of Health, Clark County Public Health, Cowlitz Indian Tribe, 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 is currently undergoing an evaluation through the National Environmental Policy Act (NEPA) to assess potential impacts. The IBR Program is currently (September 20 to November 18, 2024) undergoing 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. **You can provide comment on the DSEIS on the IBR Program website through November 18, 2024 (https://www.interstatebridge.org/DraftSEIS).**

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 the Cowlitz Indian Tribe, 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 final analysis will be complete and submitted as a public comment by the end of the comment period, November 18, 2024. This summary highlights key takeaways for each topic area and an overview of the project recommendations that will be submitted to the IBR Program. The recommendations in the final health analysis will include 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. This includes keeping public health partners, community, and Tribal representation at the table in decision-making for the Program.

Impact Area	Health Effects
Construction of the Modified LPA	• **Access.** Construction changes to roads, public transportation, and bike and pedestrian lanes could negatively impact access to employment, health care, and other needed services, particularly for those that do not have car access. • **Displacement.** The Modified LPA would acquire properties and displace residences and businesses that would disproportionately negatively affect equity priority communities in East Columbia, Rockwood, Esther Short and Rose Village. • **Air Quality.** The DSEIS does not provide sufficient evidence about projected air quality changes under the Modified LPA to properly assess health impacts to air quality during construction.
Long-Term Effects from Modified LPA	• **Air Quality**. Traffic-related air pollution contributes to negative health impacts including respiratory and cardiovascular disease, increased risk of all-cause mortality, cancer, and cognitive development for children. The DSEIS states that air quality will not be impacted, despite estimated increases in vehicle miles traveled. • **Road Safety.** The DSEIS states that crashes will increase by 15% under the Modified LPA, mainly due to estimated increases in traffic volumes. No information is provided on how crash frequency would change by travel mode, crash type, severity, location, or for environmental justice communities. • **Transit.** Mode shift from cars to new transit options under the Modified LPA will likely improve health outcomes related to physical activity. However, transit access to jobs for BIPOC residents, immigrants and refugees, and people under the age of 25 will not increase as much as it is predicted to for white, non-Hispanic residents. • **Noise.** The DSEIS describes higher levels of noise and vibration will negatively and disproportionately impact communities identified as equity priority communities. • **Tolls.** The cost of tolls would disproportionately negatively impact low-income community members.

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 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 temperature extremes, 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

Design with health in mind

1. 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.
2. Design safety features to reduce injury for active transportation users and vehicle users.
3. Improve greenspace and tree canopy cover to improve air and water quality, provide shade, and increase natural spaces.
4. Design with sustainable materials and standards to reduce greenhouse gas emissions.
5. Prioritize resilience to extreme weather events, climate change, and seismic events to improve safety.
6. Maintain and improve good air and water quality in the project area to protect physical and mental health.
7. Minimize excess noise in the project area to protect nearby neighbors and populations disproportionately affected by noise.
8. Maintain and improve connectivity and community cohesion to promote access to community services.
9. Center equity and focus on local businesses in contracting to improve economic opportunities for underrepresented groups.
10. Minimize home and business loss, and proactively support displaced residents, businesses, and employees.

Construct with health in mind

11. Meet and exceed, where possible, state and local requirements to reduce noise and air pollution to protect the health of workers and community members.
12. Design and mark routes during construction to protect pedestrians and active transportation users from injury and environmental exposures.
13. Maintain community connectivity through reliable access to transit, neighborhood services, and regular transportation routes.
14. Protect workers and community members on high-risk days for high heat and poor air quality events.
15. 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.
16. Implement workforce development and support programs to develop and retain a diverse workforce.

Prioritize sustainability, transparency, communication and health for the lifetime of the project

17. 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.
18. 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

19. Assess how design could increase access to health care in the region.
20. Compile and release to the public more information about demolition plans for the current bridges, including a detailed noise assessment 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).
21. Expand information about potential air quality, safety, and connectivity impacts of construction.
22. Compile and release to the public additional information about potential air quality, safety, and connectivity impacts of tolling-related traffic diversion through neighborhoods.
23. Develop and release to the public a detailed sampling and analysis plan of riverbed sediment including potential contaminants, hazardous sediments, and toxics.

To request this document in another format, call 1-800-525-0127. Deaf or hard of hearing customers, please call 711 (Washington Relay) or e-mail civil.rights@doh.wa.gov.

Attachment G: Summary of feedback from people with disabilities and accessibility-oriented leaders

The following highlights key takeaways from recent engagement activities conducted by the City of Vancouver, including:

- Community Connector focus group with representatives from Community in Motion, Northwest Association for Blind Athletes, Pasitos Gigantes, and Washington State School for the Blind and Washington State School for the Deaf (August 2024)
- Disability Community Meeting re: Downtown Parking Plan (June 2024)
- Conversations associated with the Comprehensive Plan Update, Heights District, Main Street Promise, and Waterfront Gateway projects

Pedestrian Infrastructure

- Poorly maintained sidewalks, cracked/uneven sidewalk around street trees and cobble streets present hazards for people who use mobility devices. They often damage people's mobility devices and discourage them from visiting certain locations.
- Pedestrian push buttons need to be low enough for someone in an assistive mobility device.
- Crossing signals need audible walk indicators.
- Remind businesses to keep their A frame signage out of the way.
- 8-10 feet is the recommend for pathway width for Deaf folks to be able to communicate with each other while walking or rolling.
- With shared use paths, guide dogs will pull to the left, which is problematic when bike and pedestrian travel is only split visually.
- 9th Street is a main east-west corridor but one of the most unsafe roads to walk along. 8th and C Street intersection is also unsafe.

Transit Service

- Bus service doesn't always take folks exactly to their destination. Identify high-priority routes between transit pick-up/drop-off locations and major destinations.
- Dedicated pick-up/drop-off zones for people using van services (C-TRAN's C-VAN or Community in Motion) are needed.

Parking & Drop-off Zones

- Accessible parking spaces need 8 feet clearance (typically on the right side of car but some accessible vans have rear entrance) and should be close to ramp that leads to sidewalk/entrance to destination.
- Ensure pick-up/drop-off zones have enough clearance for people with wheelchairs or mobility devices.

- Add more accessible parking than the required minimum.
- Keep in mind the destinations—accessible parking that's blocks away from the destination isn't accessible.
- Enforce accessible parking regulations (e.g., have a placard) and fine violators.
- "Empathetic" signage and marketing campaigns can help curb abuse/misuse of accessible parking spots.
- Parking meters/pay stations and the signage on them needs to be accessible and readable for people in wheelchairs.
- Ensure parking garages (if any are added) are clearly marked and brightly lit.
- Work with local business owners to use private lots on weekends/when not in use.

Construction impacts

- Construction notifications and information about how access will be impacted, particularly for people with disabilities, is critical.
- Offer more thoughtful alternate routes when streets are blocked by construction. Crossing unexpectedly is often not possible for people using a mobility device. Notices posted at intersections could let people know if the street ahead is not accessible.

Communication

- Plan for and provide info in other languages:
    - Braille should always be available, even if there's an audio button to give audible information.
    - Spanish is the second most spoken language, followed by Russian, Ukrainian, and Vietnamese. Vancouver also has a large Chuukese population. QR codes could be used to provide information in other languages.
- Check with experts to ensure Braille and multilingual signage is correct. The Ogden Resource Center at Washington State School for the Blind can help check accuracy of Braille.
- Braille signage should be made in metal and located in a place that a blind person will find it, not above a stairwell or on a bottom stair.
- QR codes are supplemental to Braille, not an alternative to Braille. When using QR codes on public signage, provide a tactile box around the code.

Design guidelines or principles

- Implement universal design guidelines from the **American Society of Landscape Architects** or other organizations, including:
    - Textured paving and textured transitions, helping people understand where they are on the street.
    - Use tactile wayfinding directional strips and different shaped poles for different things (e.g., octagonal pole for transit stop versus round pole for information or speed limit signs).
    - Some spaces have used a different shaped pole to indicate transit stop vs. speed limit sign (octagonal vs. round)
    - Accessible sidewalks, free of obstructions, such as major cracks or rises in the pavement.

    - Accessible wayfinding, including signs with Braille or scannable QR codes for people with low vision.
    - Public spaces and seating options that are comfortable for multiple people using mobility devices.
    - Create **DeafScapes** and design street spaces to better meet **Deafspace design guidelines.**
    - Use colors that help reduce glare and minimize overstimulation for neurodivergent community members.
- Provide green spaces with shade.

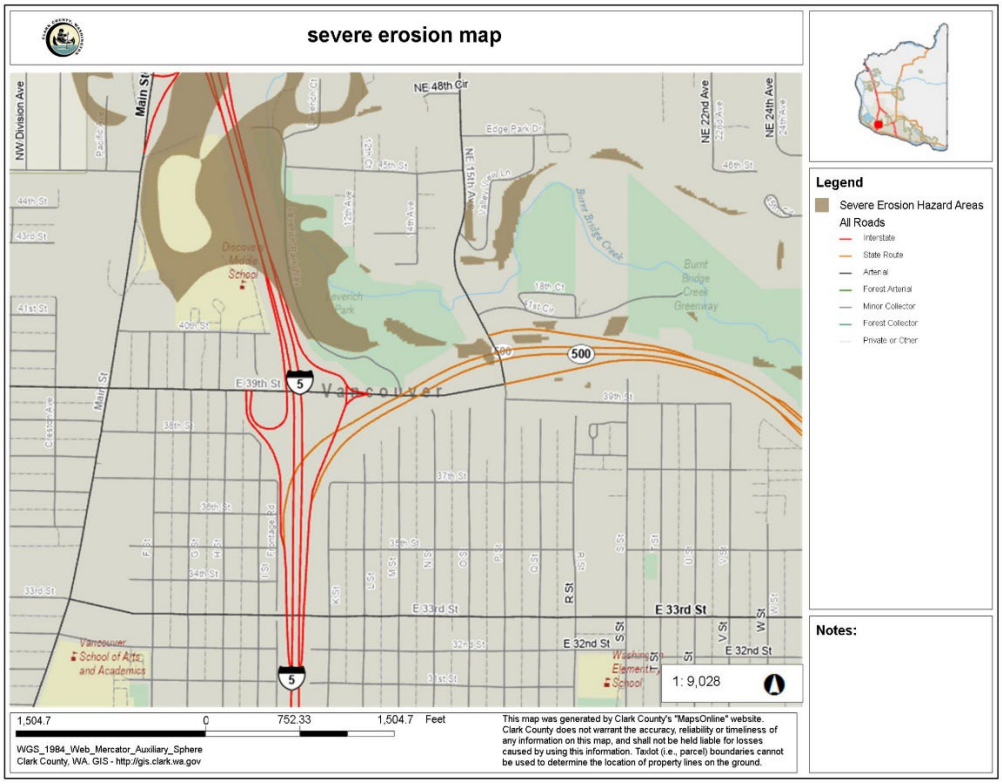
Disability community-featured art:

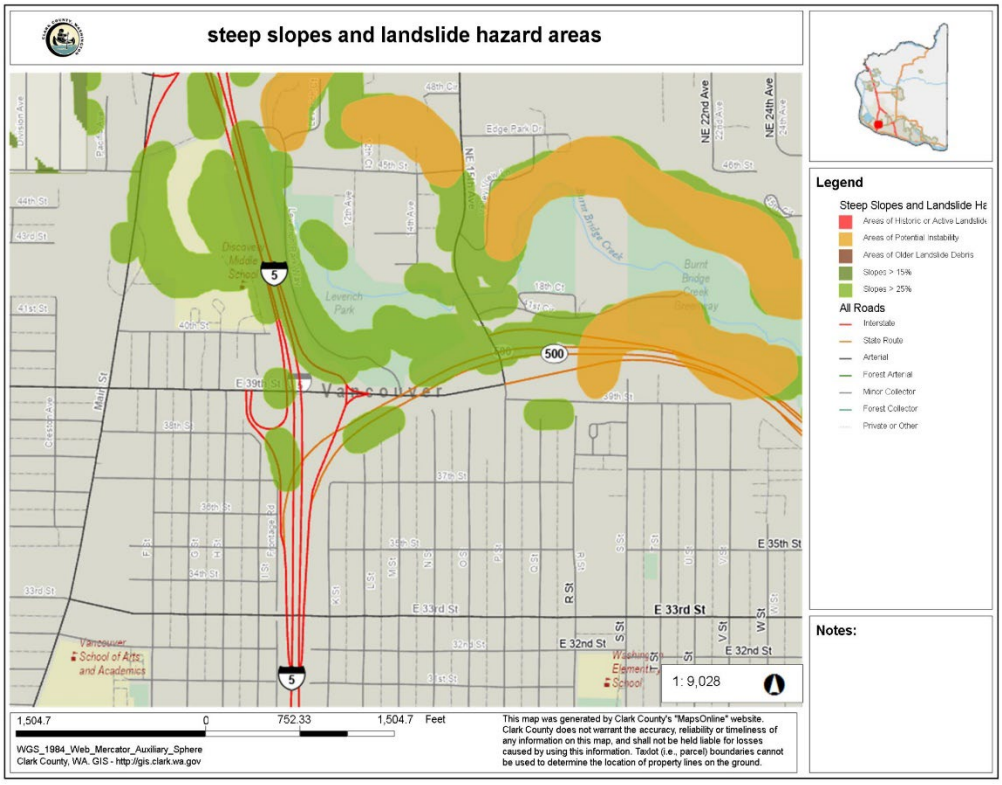
- Vancouver was the birthplace for support and hub for a lot of people with disabilities. It is a special place for marginalized and under-represented communities, especially youth. This history can be brough forward through public art.
- Washington State School for the Blind and Washington State School for the Deaf were part of this community before WA statehood. Could be partners in getting art into place.

Future Engagement

- Connect directly with people who are blind, deaf, have mobility issues during the design process and through implementation to get first-hand experience ("Nothing About us Without Us!" - DDOmbuds.org).
- Vancouver partners to include:
    - Community in Motion
    - National Federation of the Blind
    - Northwest Association for Blind Athletes
    - Pasitos Gigantes
    - Veterans: Clark County Veteran Assistance or Vancouver VA Medical Center
    - Washington Council for the Blind
    - Washington State School for the Blind
    - Washington State School for the Deaf
- Ensure all graphics are accessible for future engagement.
- Provide braille/tactile maps at large gatherings.

Attachment H: Geologic Hazard maps created from [MapsOnline, Clark County WA. GIS.]





MAIN STREET PROMISE

Safe. Accessible. Connected.

Project Overview

The City of Vancouver is investing in the future of Main Street—making it safer, more accessible and connected for businesses, residents and visitors.

A community-led effort nearly 30 years in the making, this project will reconstruct Main Street from 5th Street to 15th Street. The roadway, sidewalks, street lighting and adjacent outdoor spaces will be reconfigured to improve safety, foster a sense of community and drive economic prosperity.

Engagement & Feedback

Over the past year, the Main Street design was developed and refined via community input gathered through presentations at more than 20 City and community boards and commissions meetings, five project advisory group meetings, two open house events and two surveys. The project team also received feedback through numerous online and in-person interactions with property owners, businesses and community members who walk, bike, roll, drive and use public transit to visit Main Street.

Project Improvements & Benefits

Increase safety and mobility

- Curbless streets to increase access and help slow traffic
- Extended and ADA-compliant sidewalks
- Tactile sidewalk treatments and audible crossings for visually impaired community members
- Pedestrian-scale lighting to illuminate sidewalks
- Enhanced intersections and crosswalks
- More bicycle parking
- New traffic bumps to reduce vehicle speed
- Parallel parking to improve visibility for drivers and pedestrians

Welcome visitors and support Main Street businesses

- Removable bollards that can close the street for pedestrian-only events
- Outdoor seating and furnishings
- Year-round decorative lighting
- Pet waste disposal stations
- Six new dedicated spaces for fixed or rotating public art

Improve infrastructure

- Reconstruct water, sewer and stormwater utilities
- Repave the roadway surface and install new traffic signals
- New power access for use during festivals and events
- Electric charging stations for vehicles and e-bikes



The project area covers approximately a half-mile stretch of Main Street from 5th to 15th Street.

Contact the project team

beheardvancouver.org/mainstreetpromise

(360) 487-7940

smallbusiness@cityofvancouver.us

See more project information, including open house exhibits and summaries →

beheardvancouver.org/mainstreetpromise

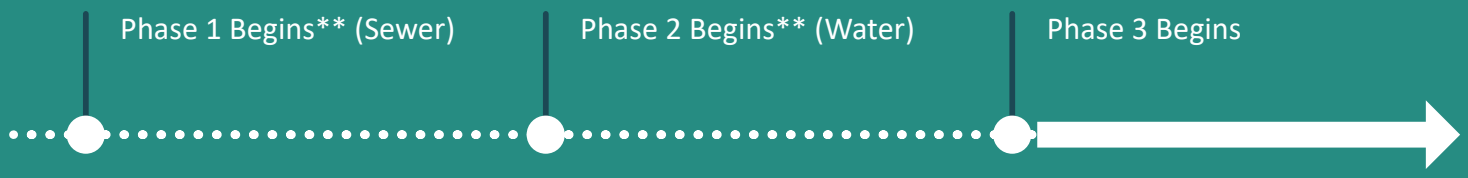
Learn more about project advisory group members and review meeting summaries →

beheardvancouver.org/mainstreetpag

Attachment 1

Construction Timeline*

Construction will occur two blocks at a time during each phase.



Summer 2024

Block Captains kickoff

Coffee Corners begin

Winter 2024

2025 to 2026

** Construction schedules are subject to change.*
*** Construction begins at 5th Street*

Construction Approach & Impacts

Main Street construction will happen in three phases to help minimize disruptions to businesses and residents. During each phase, work will occur two blocks at a time. This approach allows for normal vehicle and pedestrian access outside of the construction zone.

Within the two-block construction zone, the contractor will be required to maintain pedestrian access to buildings. Temporary closures to pedestrians (up to 4 hours at a time) will be needed at times to complete work. During those times, accessible detours will be provided. The project team will communicate with affected businesses and property owners in advance to help minimize construction impacts.

Phase 1 (reconstruct sewer utilities) & Phase 2 (reconstruct water utilities)

- Minimal sidewalk impacts, heavy road impacts.
- Construction begins at 5th Street and moves towards 15th Street.
- Temporary business impacts when connecting utilities (4 hours max per closure).

Phase 3 (all other streetscape construction)

- Sidewalk and road impacts.
- Construction begins in two-block increments between 5th Street and 15th Street.
- Temporary business impacts expected (4 hours max per closure).

Supporting Businesses During Construction

The City is committed to working with business owners to ensure that they have up-to-date information and that their concerns are addressed in a timely manner. A Block Captain program will be implemented at the start of construction, ensuring each business has a go-to resource on their block for the latest information. A construction hotline will allow businesses to report concerns and receive support. The project team will also host a series of "Coffee Corners" with business owners, assist businesses with marketing efforts and offer technical assistance for business needs.

Downtown Stakeholders Forum

Regular City of Vancouver and VDA meeting that provides key progress updates. View schedule here: **beheardvancouver.org/downtown-stakeholders**

MAIN STREET PROMISE
Safe. Accessible. Connected.

Project information is also available in Spanish and Russian at **beheardvancouver.org/MainStreetPromise**. If you would like to request interpretation support, project materials in another language or accommodations with a disability, please email smallbusiness@cityofvancouver.us or call (360) 487-7940.

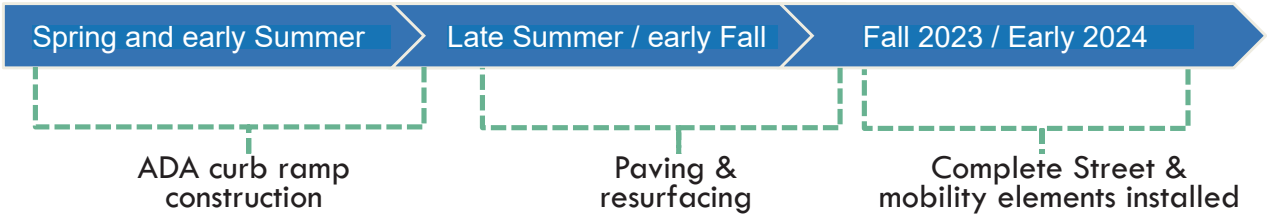
Attachment I

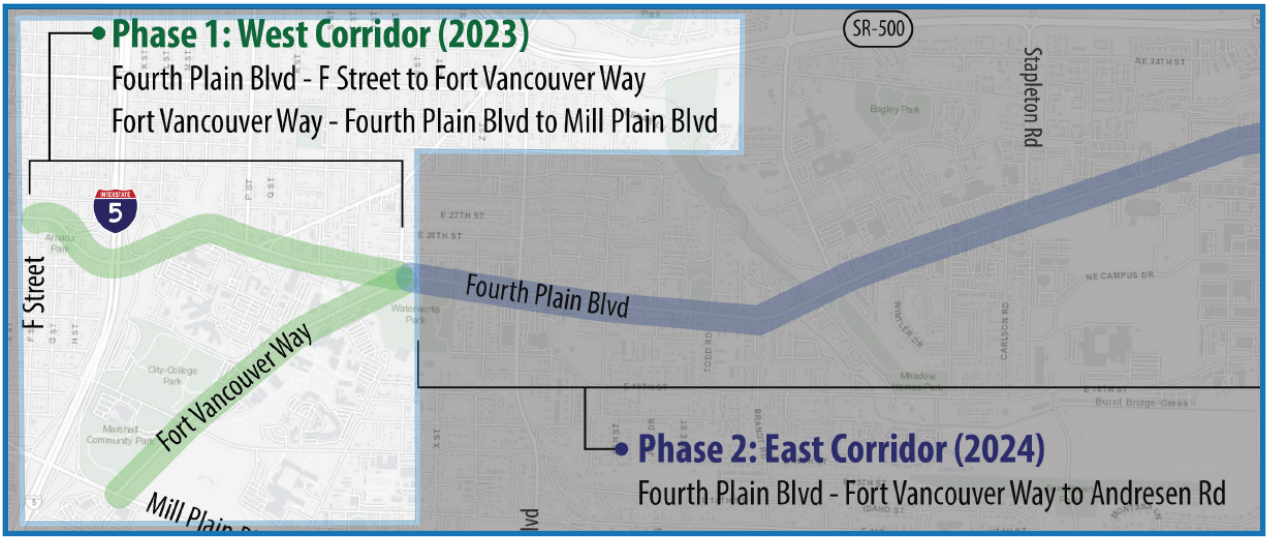
Fourth Plain Boulevard & Fort Vancouver Way Safety and Mobility Project

Project Purpose

- Leverage planned paving preservation project to transform roadway to safely serve all users
- Look at ways to make the streets safer for all including people who drive, walk, ride a bike, use a mobility device, or ride the bus
- Identify other potential safety improvements

Phase 1 Project Extent & Timeline (2023-2024)







Fourth Plain, F Street - Ft. Vancouver Way

- Two-way cycle track on south side of Fourth Plain (2024)

Ft. Vancouver Way, McLoughlin - Fourth Plain

- Improve cycling and transit modes
- Add buffered mobility lanes and BAT* lanes
- Remove on-street parking north of McLoughlin



Ft. Vancouver Way, Mill Plain - McLoughlin

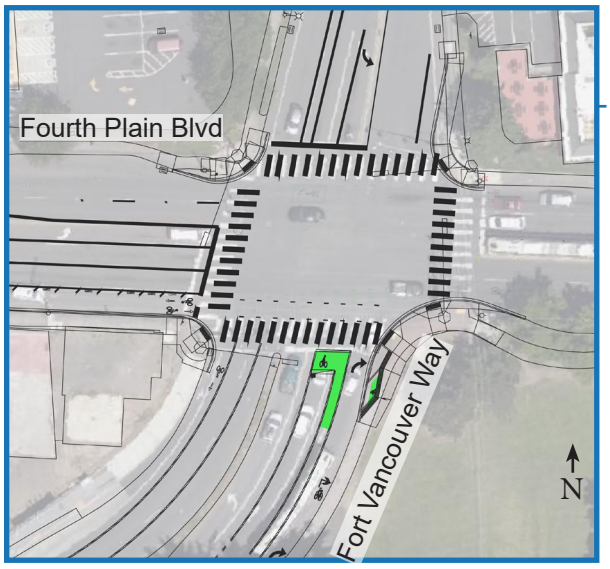
- BAT lanes and buffered mobility lanes on east and west side of Ft. Vancouver Way (2024)

*BAT lanes are for buses and right turning vehicles to access local businesses and streets

Attachment I

Fourth Plain Boulevard & Fort Vancouver Way
Safety and Mobility Project

Phase 1 Fourth Plain Blvd and Fort Vancouver Way Intersection Improvements



Fourth Plain & Ft. Vancouver Way Intersection

- Bi-directional bike lane on south side of Fourth Plain Blvd (west of Ft. Vancouver Way)
- Buffered bike lane on Ft. Vancouver Way with bike box for through and left turn bicycle travel.

Community Engagement

- **Community members were supportive of safety and mobility improvements along Fourth Plain Blvd & Fort Vancouver Way. Respondents were in favor of investments in both public transit and bike infrastructure, with a focus on safety for all road users.**
- **83% of surveyed residents and 88% of small businesses support repurposing a vehicle travel lane to counteract speeding, improve transit reliability and create more safe travel options for pedestrians and small mobility users.**

Next Steps

Phase 1 Completion (2024)

Fourth Plain Blvd, Ft. Vancouver Way

- Complete Street & mobility elements installed

Phase 2 Implementation (2024 and beyond)

Fourth Plain Blvd, Ft. Vancouver Way - Andresen Road

- Add buffered mobility lanes, and BAT lanes
- See the BeHeard Page for more Phase 2 design details

Learn More:
vancouvermoves@cityofvancouver.us
beheardvancouver.org/fourth-plain-fort-vancouver-mobility

CITY OF Vancouver WASHINGTON

Attachment I

29th & 33rd Streets
SAFETY & MOBILITY PROJECT

CITY OF Vancouver WASHINGTON

The 29th and 33rd Streets Safety and Mobility Project is exploring how to improve safety and mobility for all people using 29th Street between Kauffman Avenue and Neals Lane, and 33rd Street between Kauffman Avenue and Grand Boulevard. These roads connect Vancouver neighborhoods separated by Interstate 5 (I-5) and provide important connections to other roads, such as Main Street, St. Johns Boulevard and Grand Boulevard.

This project is coordinating with pavement work planned for 2025 between I-5 and St. Johns Boulevard and the longer-term reconstruction of the I-5 overpasses through the Interstate Bridge Replacement Program.

Preliminary Design Considerations

- **Complete Streets policy:** Ensures all people can share the road safely and comfortably
- **Vancouver Transportation System Plan:** Identifies the project roadways as important community connections on the pedestrian and bike/small mobility networks
- **Existing conditions analysis:** Evaluation of traffic volumes, speeds, crash data, parking occupancy, roadway condition, and identification of safety and accessibility issues

Project Timeline

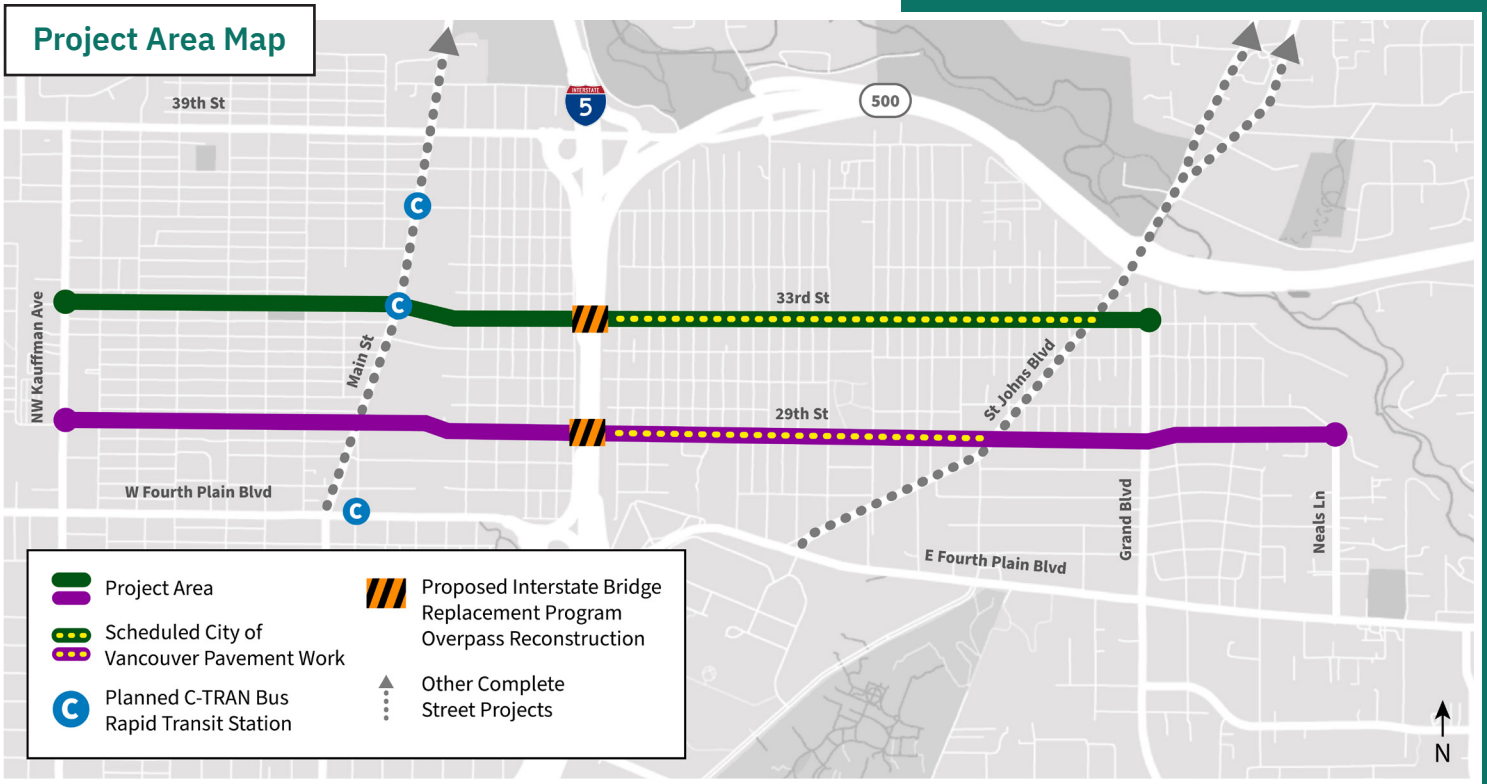
March - May 2024
Assess existing conditions within the project area.

June - July 2024
Share project information and gather your feedback on opportunities for improvements along the corridor.

August - October 2024
Share design recommendations and gather your feedback on near-term and long-term investments.

2025 – 2026
Implement the near-term improvements through planned pavement work and evaluate project impacts.

Project Area Map



Visit the project website to learn more, sign up for email updates and share your comments!
beheardvancouver.org/29th-and-33rd-safety

To request accessible formats or other languages, contact:
VancouverMoves@CityofVancouver.us
360-487-8000 | WA Relay: 711

IBR Draft SEIS - RECORD #3567 DETAIL

First Name :	Linda/Brian
Last Name :	Burright
Attachments :	DSEIS_3567_Burright_Original.pdf (88 kb) Comments_Bridge_Architecture.pdf (87 kb)

IBR Draft SEIS - RECORD #3567 DETAIL

Submission Date :	11/19/2024
First Name :	Linda/Brian
Last Name :	Burright
Business/Organization/Agency :	
Attachments :	Comments Bridge Architecture.pdf (87 kb)

Submission Input :

Comment submitted to the Interstate Bridge Replacement Draft SEIS

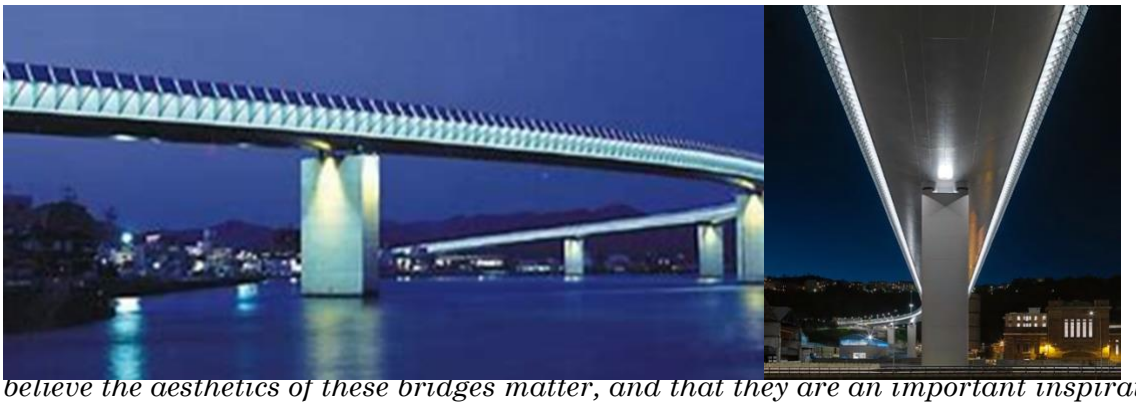
By Linda and Brian Burright

[redacted]
[redacted]

Linda and Brian Burright
Comments about Architectural Design

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.

Submitted 11/18/24
Brian and Linda Burright
[redacted]

Linda and Brian Burright
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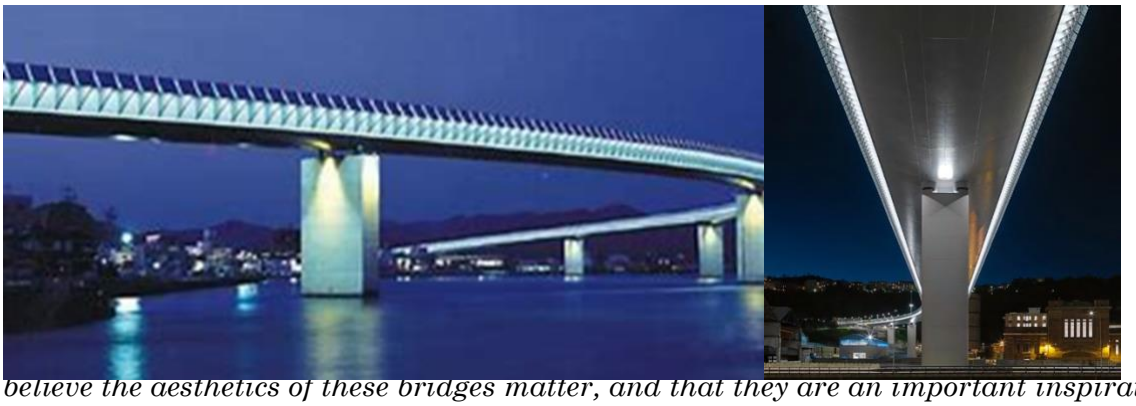

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Submitted 11/18/24
Brian and Linda Burright
429 N Bridgeton Road #9
Portland OR 97217

IBR Draft SEIS - RECORD #3568 DETAIL

First Name :	Linda
Last Name :	and Brian Burright
Attachments :	DSEIS_3568_Burright_Original.pdf (183 kb)

IBR Draft SEIS - RECORD #3568 DETAIL

Submission Date :	11/19/2024
First Name :	Linda
Last Name :	and Brian Burright
Business/Organization/Agency :	
Attachments :	Comments on Cork Screw Ramps.pdf (182 kb)

Submission Input :

Comment submitted to the Interstate Bridge Replacement Draft SEIS

By Linda and Brian Burright

[redacted]
[redacted]

Linda and Brian Burright
Comments on the Cork Screw Ramps

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.

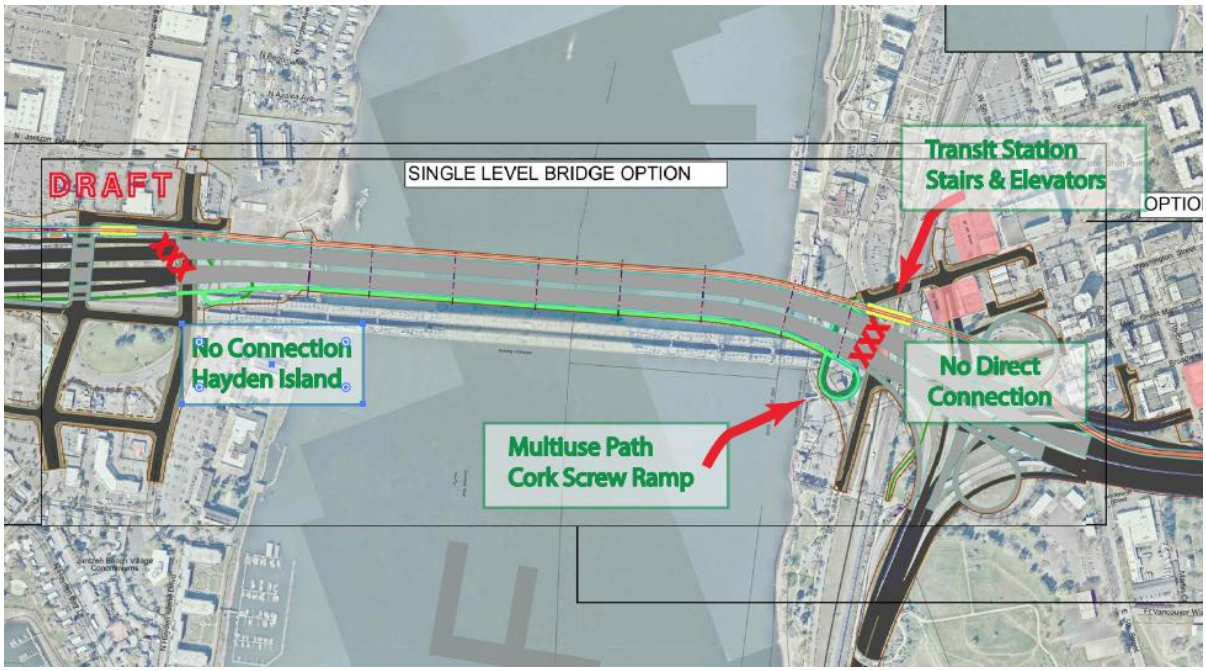
The multiuse path is built on the north bound main bridge span. The end point of the multiuse path on the Vancouver shoreline is approximately 100' in elevation above the ground and is access by a cork screw ramp of approx. ½ mile in length.

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.



Submitted 11/18/24
Brian and Linda Burright
[redacted]

IBR Draft SEIS - RECORD #3569 DETAIL

First Name :	Linda
Last Name :	and Brian Burright
Attachments :	DSEIS_3569_Burright_Original.pdf (183 kb) Comments_Bridge_Architecture.pdf (87 kb)

IBR Draft SEIS - RECORD #3569 DETAIL

Submission Date :	11/19/2024
First Name :	Linda
Last Name :	and Brian Burright
Business/Organization/Agency :	
Attachments :	Comments on Cork Screw Ramps.pdf (182 kb)

Submission Input :

Comment submitted to the Interstate Bridge Replacement Draft SEIS

By Linda and Brian Burright

[redacted]
[redacted]

Linda and Brian Burright
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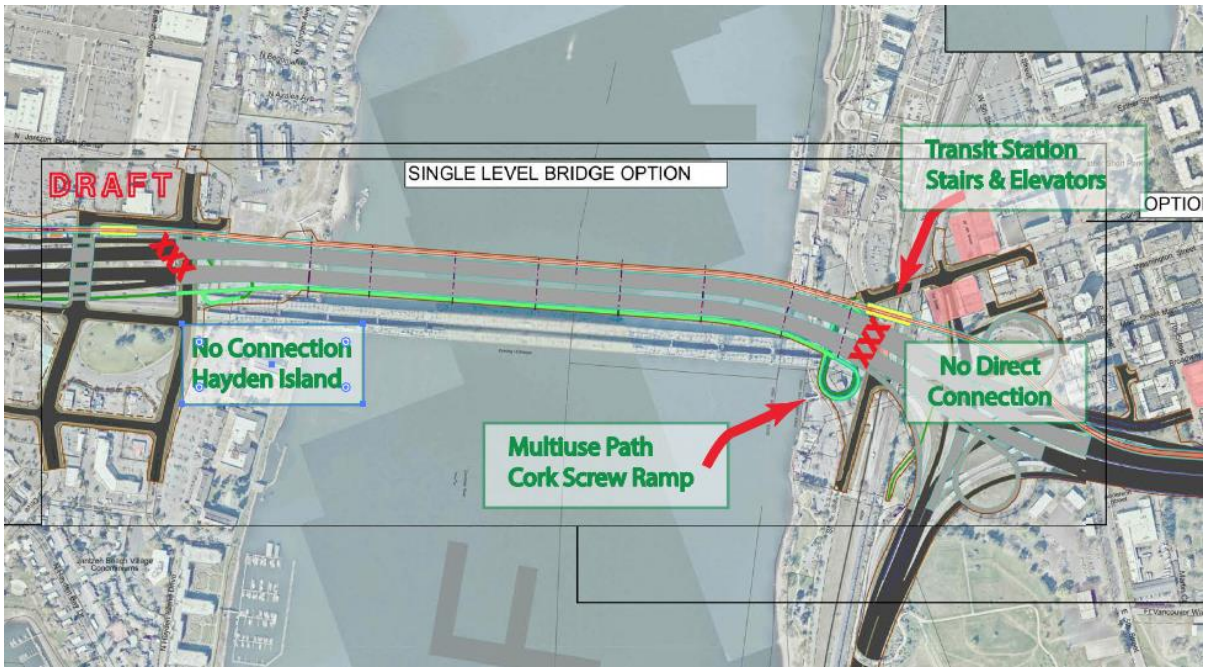

Submitted 11/18/24
Brian and Linda Burright
[redacted]

Linda and Brian Burright
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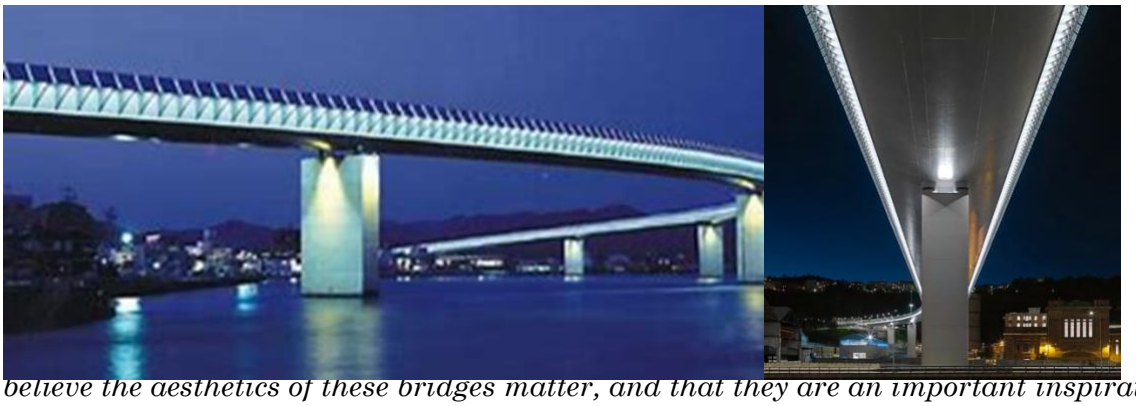

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Submitted 11/18/24
Brian and Linda Burright
429 N Bridgeton Road #9
Portland OR 97217

IBR Draft SEIS - RECORD #3570 DETAIL

First Name :	James
Last Name :	Franklin
Attachments :	DSEIS_3570_Franklin_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #3570 DETAIL

Submission Date : 11/18/2024
First Name : James
Last Name : Franklin
Business/Organization/Agency :

Submission Input :

First Name:
James

Last Name:
Franklin

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Public Services and Utilities

Comment:
Double Deck with light rail is the only acceptable option. If you look at the Portland bridges, you always notice that 405 has so many fewer incidents and congestion than 205, and we've been putting off this MAX extension for long enough.

JCA comment #: 963

IBR Draft SEIS - RECORD #3571 DETAIL

First Name :	Linda
Last Name :	and Brian Burright
Attachments :	DSEIS_3571_Burright_Original.pdf (156 kb)

IBR Draft SEIS - RECORD #3571 DETAIL

Submission Date :	11/19/2024
First Name :	Linda
Last Name :	and Brian Burright
Business/Organization/Agency :	
Attachments :	Marine Drive Bike Lanes.pdf (154 kb)

Submission Input :

Comment submitted to the Interstate Bridge Replacement Draft SEIS

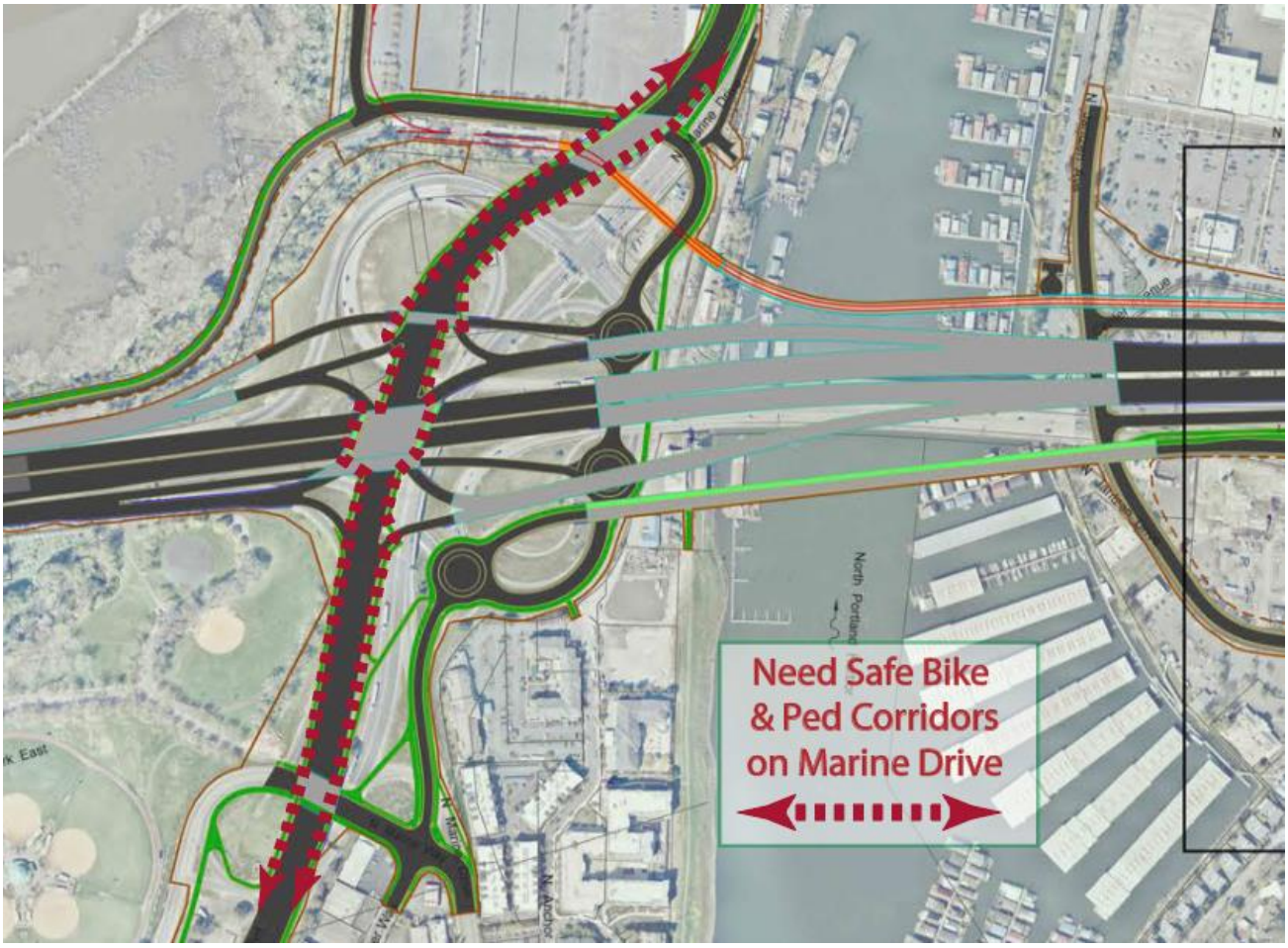
By Linda and Brian Burright

[redacted]
[redacted]

Brian and Linda Burright
Comments on FREIGHT and BIKE CONFLICTS

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.

Submitted 11/18/24
Brian and Linda Burright
[redacted]

IBR Draft SEIS - RECORD #3572 DETAIL

First Name :	Linda
Last Name :	and Brian Burright
Attachments :	DSEIS_3572_Burright_Original.pdf (312 kb) MLK_Undercrossing.pdf (312 kb)

IBR Draft SEIS - RECORD #3572 DETAIL

Submission Date :	11/19/2024
First Name :	Linda
Last Name :	and Brian Burright
Business/Organization/Agency :	
Attachments :	MLK Undercrossing.pdf (312 kb)

Submission Input :

Comment submitted to the Interstate Bridge Replacement Draft SEIS

By Linda and Brian Burright

[redacted]
[redacted]

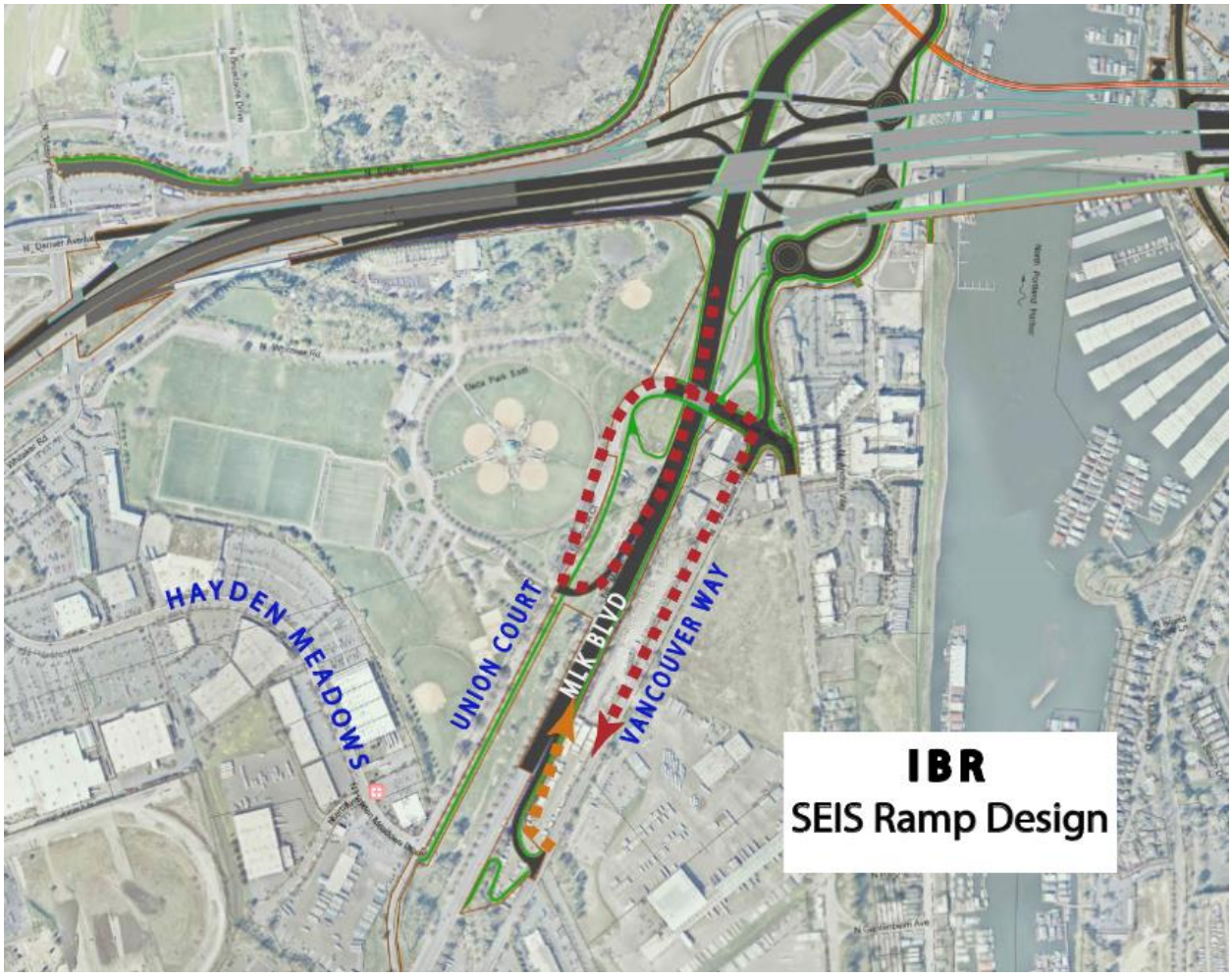
Brian and Linda Burright
Build a MLK Undercrossing to Better Meet the Purpose and Need

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.

Submitted 11/18/24
Brian and Linda Burright
[redacted]

Brian and Linda Burright
Build a MLK Undercrossing to Better Meet the Purpose and Need

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:

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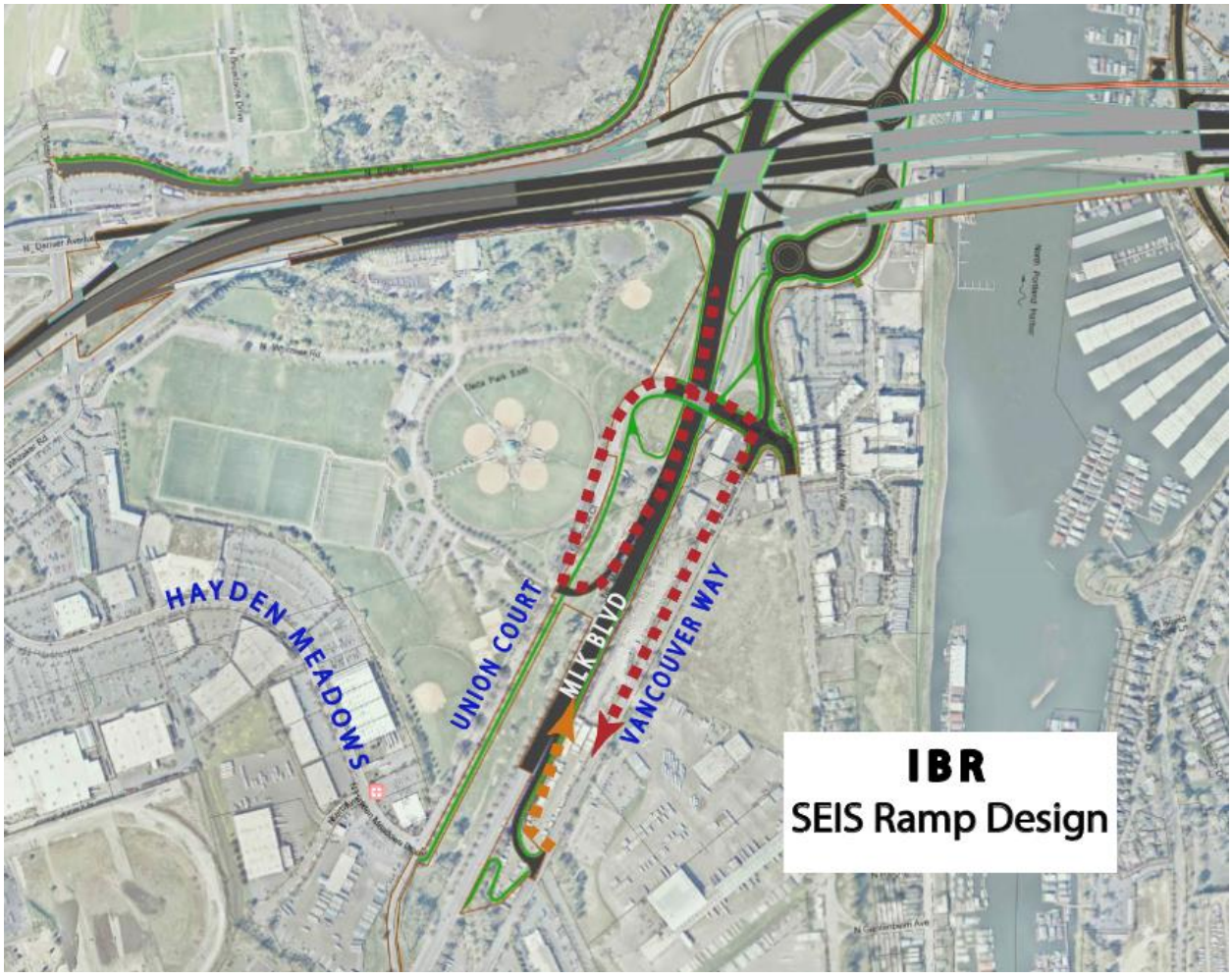

Problems with the proposed MLK ramp design

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*
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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:

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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.

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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.

Submitted 11/18/24
Brian and Linda Burright
429 N Bridgeton Road #9
Portland OR 97217

IBR Draft SEIS - RECORD #3573 DETAIL

First Name :	Nancy
Last Name :	Booth
Attachments :	DSEIS_3573_Booth_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #3573 DETAIL

Submission Date : 11/19/2024
First Name : Nancy
Last Name : Booth
Business/Organization/Agency :

Submission Input :

Dear Sir

I was dismayed to learn that ODOT is moving forward on tolling of the I-5, 205, 26 and 217 freeways for "congestion relief." Tolling only a small segment of Oregon's roads to pay for road improvements for the whole state is unfair and inefficient. The idea that tolling will "provide congestion relief" is also absurd given the total lack of public transportation in these areas. People use those roads because they have to!

I am willing to pay more for road improvements but tolling is not only unfair it is extremely inefficient. ODOT has refused to disclose how much of the tolls will actually go to roads and how much will go to pay for the out of state consultants administering the tolls. An independent analysis showed that approximately $1 out of every $7 collected will actually go to road improvements and maintenance. The other $6 will go to outrageously high administrative costs (paid to out of state consultants.)

ODOT plans to excessively toll a small segment of the population to solve statewide problems. People living along the 205 corridors (where there is almost no public transportation) will be forced to pay outrageous monthly tolls.

ODOT has stated that they want to get cars off of 205 (to solve their problem) by tolling, despite the fact that they know the traffic will simply be diverted onto already clogged residential roads. They have done NOTHING to assess the impact on the communities surrounding 205. They plan to get rid of their traffic problem by dumping it onto our local streets, creating congestion and safety hazards for local neighborhoods. They have done no realistic environmental impact studies.

A more efficient, more equitable way to pay for transportation costs would be to tax drivers on the number of miles traveled (whether gas or EV vehicles.)

It is clear that ODOT is choosing the plan most convenient for them, not the most efficient, fair or strategic. They have shown a complete disregard for the financial, safety and congestion problems they are creating for smaller communities.

I urge the Oregon Legislature to make ODOT stop their current unfair and poorly planned tolling program and come up with a better plan that actually solves problems instead of shifting them to "someone else".

Sincerely

Nancy Booth

[redacted]

IBR Draft SEIS - RECORD #3574 DETAIL

First Name :	MARTIN
Last Name :	SLAPIKAS
Attachments :	DSEIS_3574_Slapikas_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #3574 DETAIL

Submission Date : 11/18/2024
First Name : MARTIN
Last Name : SLAPIKAS
Business/Organization/Agency :

Submission Input :

First Name:
MARTIN

Last Name:
SLAPIKAS

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
An excerpts out of eight from a previously submitted, recently remediated, HINooN Paper entitled, "Concerns Regarding the Current I-5 Bridge Replacement Projecrt (IBRP) Remediated 2024-7-04.

4. EARTHQUAKE VULNERABILITY:

My Hayden Island Neighborhood Association has the concern 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.

JCA comment #: 962

IBR Draft SEIS - RECORD #3575 DETAIL

First Name :	Linda
Last Name :	and Brian Burright
Attachments :	DSEIS-3575_Burright_Original.pdf (355 kb) Separating_Freight__Bike_Travel.pdf (354 kb)

IBR Draft SEIS - RECORD #3575 DETAIL

Submission Date :	11/19/2024
First Name :	Linda
Last Name :	and Brian Burright
Business/Organization/Agency :	
Attachments :	Separating Freight & Bike Travel.pdf (354 kb)

Submission Input :

Comment submitted to the Interstate Bridge Replacement Draft SEIS

By Linda and Brian Burright

[redacted]
[redacted]

Brian and Linda Burright
Comments on Separating Freight and Bike Travel

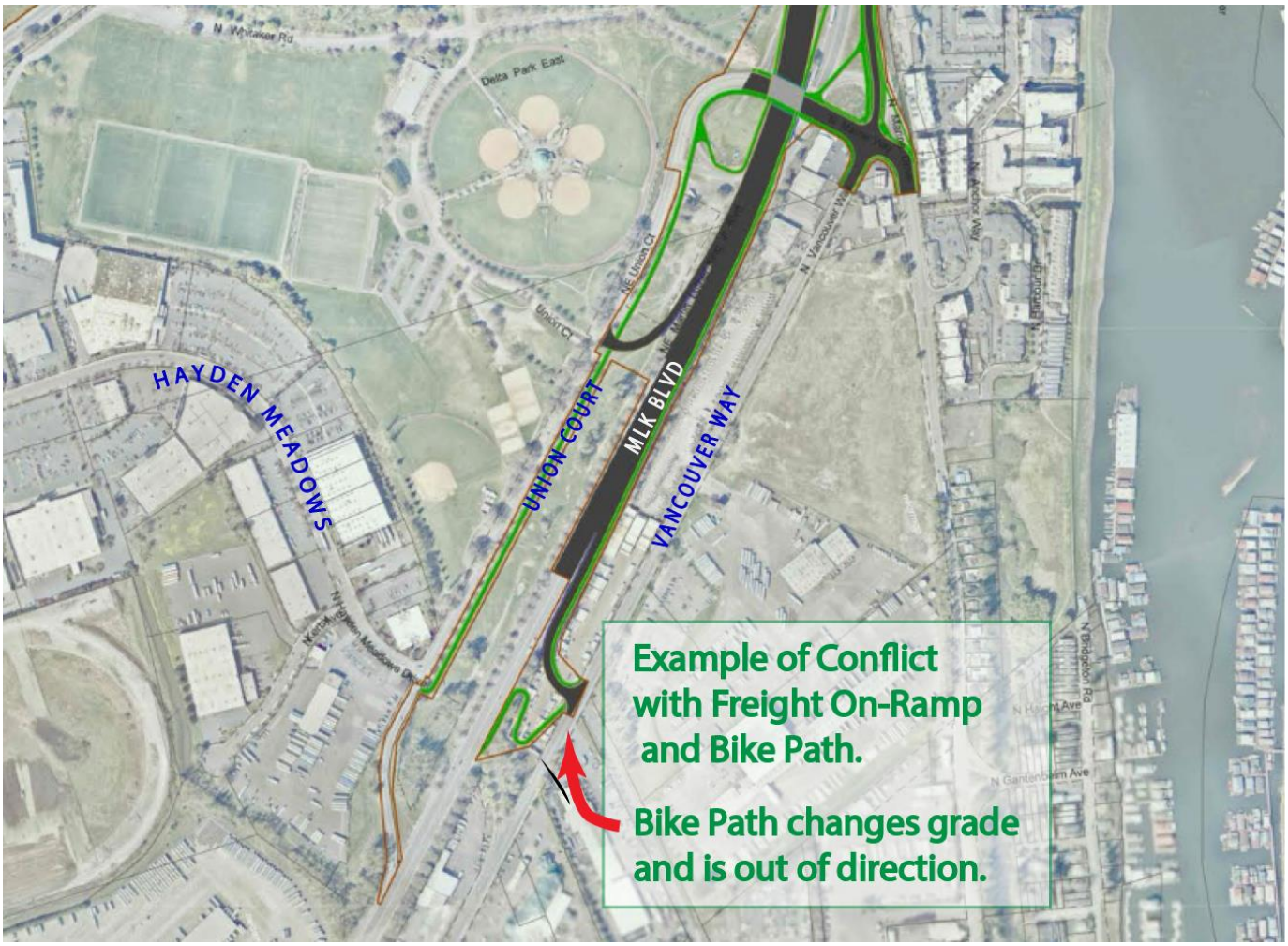
One important purpose and need of the IBR is to (c) improve highway freight mobility and address interstate travel and commerce needs in the Program area.

Another important purpose and need is to (b) improve connectivity, reliability, travel times, and operations of public transportation modal alternatives in the Program area.

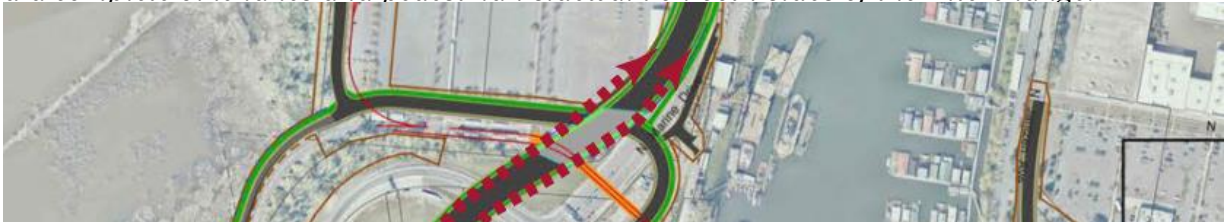
A way to meet the purpose and needs of both Freight Users and Active Transportation Users is to build active transportation routes physically separated from Freight routes as much as possible. Maximizing this separation is key to creating efficient Freight routes while creating safer, more attractive, 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.*

Submitted 11/18/24
Brian and Linda Burright
[redacted]

Brian and Linda Burright
Comments on Separating Freight and Bike Travel

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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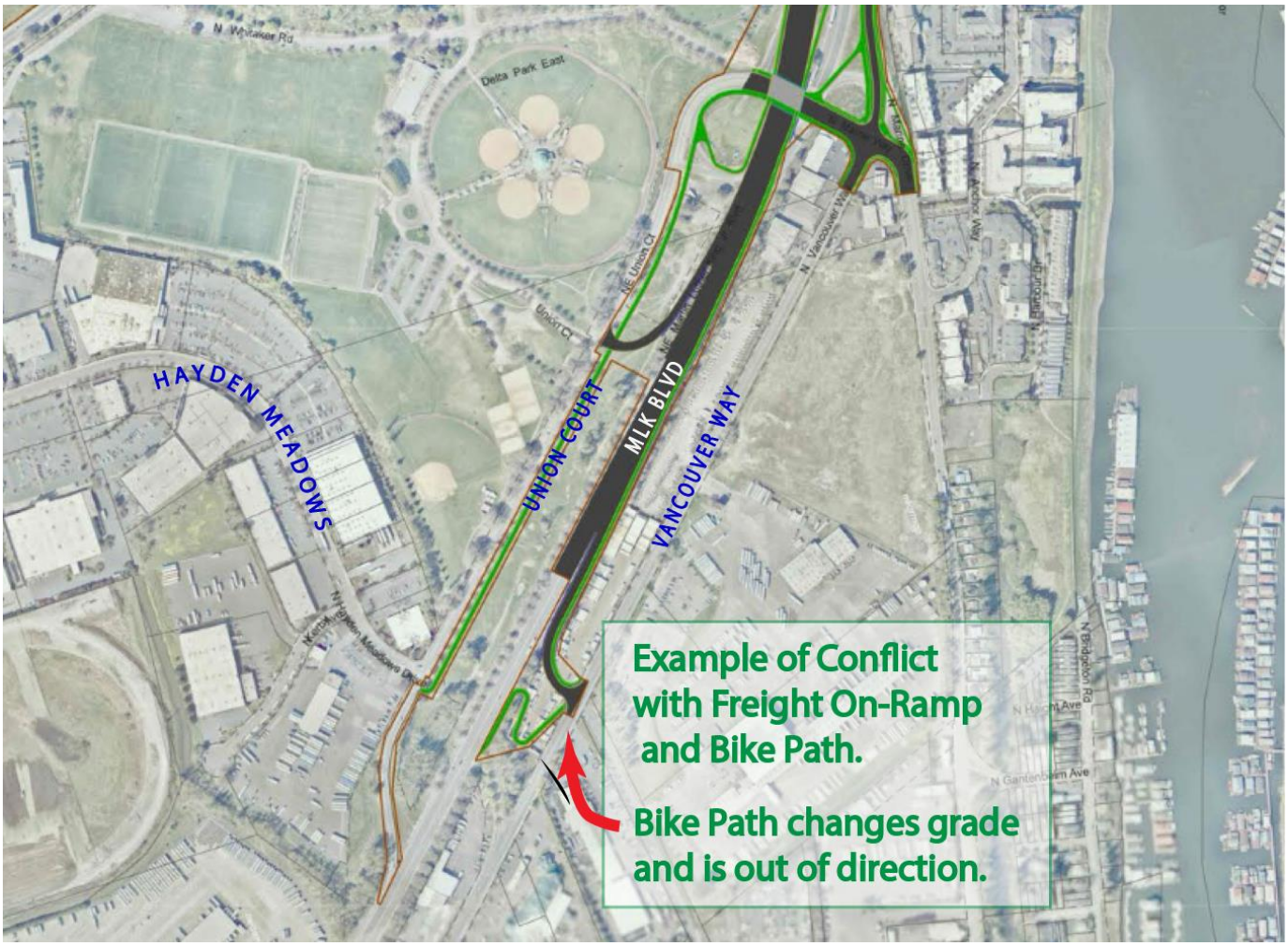

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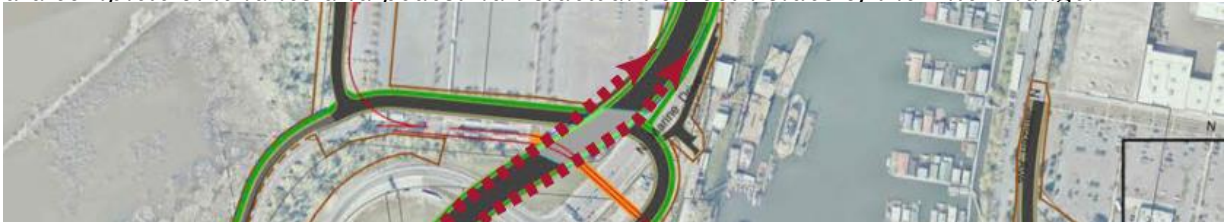

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Submitted 11/18/24
Brian and Linda Burright
429 N Bridgeton Road #9
Portland OR 97217

IBR Draft SEIS - RECORD #3576 DETAIL

First Name :	Donna
Last Name :	Loper
Attachments :	DSEIS_3576_Loper_Origional.pdf (8 kb)

IBR Draft SEIS - RECORD #3576 DETAIL

Submission Date : 11/18/2024
First Name : Donna
Last Name : Loper
Business/Organization/Agency :

Submission Input :

First Name:
Donna

Last Name:
Loper

Business or Organization:
Self

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
Two issues with the current Interstate 5 bridge.
First, the excessive tolls are unbearable for local employees to live in Vancouver, Waand work in urban Portland, Or.

Second, an 18-lane interchange planned for Hayden Island will create another pich point traffic where I5 thru

downtown Portland cannot support that level of traffic with its current constrained lane size. And, where is the research that eliminates a "remodel" to the existing I5 but another bridge East about the Troutdale, Camas location...where the large growth area exists, and available real-estate to relieve capacity constraints on I5 AND I205 respectively.

JCA comment #: 961

IBR Draft SEIS - RECORD #3577 DETAIL

First Name :	Linda
Last Name :	and Brian Burright
Attachments :	DSEIS_3577_Burright_Origional.pdf (129 kb)

IBR Draft SEIS - RECORD #3577 DETAIL

Submission Date :	11/19/2024
First Name :	Linda
Last Name :	and Brian Burright
Business/Organization/Agency :	
Attachments :	Synergies to build the Bridgeton Trail.pdf (128 kb)

Submission Input :

Comment submitted to the Interstate Bridge Replacement Draft SEIS

By Linda and Brian Burright

[redacted]
[redacted]

Brian and Linda Burright
Comments on Ways to Build the Bridgeton Trail

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.



T
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Submitted 11/18/24
Brian and Linda Burright
[redacted]

IBR Draft SEIS - RECORD #3578 DETAIL

First Name :	Jane
Last Name :	Wimmer
Attachments :	DSEIS_3578_Wimmer_Original.pdf (630 kb) STOP-IBR-I-5-BRIDGE-Replacement-5.jpg (424 kb)

IBR Draft SEIS - RECORD #3578 DETAIL

Submission Date : 11/18/2024
First Name : Jane
Last Name : Wimmer
Business/Organization/Agency :

Submission Input :

First Name:
Jane

Last Name:
Wimmer

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
Unfortunately, the IBR committee has not treated Hayden Island as a "going concern". The current proposal will totally destroy island commerce as well as the suitability for current residents to remain on the island. I don't believe the current proposal fully considers the impact to Hayden Island community. A proposed causeway into Portland (from the south side of the island) is helpful but all the rest of the proposal will diminish reasonable living conditions as well as have a huge impact on the businesses on the island. Is there a budget to at least provide an option to do a buyout for any residential owner and/or business owner to leave the island? There are soooooooo many problems with the proposed bridge -- height, public transport stations, less commercial boats going up river due to lower bridge height (impacting communities further up the river) and bicyclist/ wheel chair access just to mention a few. And it seems the planning committee is hard pressed to not

fully divulge full information regarding their proposal. There are so many people who are misinformed and just assuming a "new bridge" will solve the problem -- the committee is counting on those people who are wearing blinders.

Attachment (maximum one):
STOP-IBR-I-5-BRIDGE-Replacement-5.jpg

JCA comment #: 960

IBR Draft SEIS - RECORD #3579 DETAIL

First Name :	Linda
Last Name :	and Brian Burright
Attachments :	DSEIS_3579_Burright_Original.pdf (156 kb)

IBR Draft SEIS - RECORD #3579 DETAIL

Submission Date :	11/19/2024
First Name :	Linda
Last Name :	and Brian Burright
Business/Organization/Agency :	
Attachments :	The Vancouver Dip.pdf (155 kb)

Submission Input :

Comment submitted to the Interstate Bridge Replacement Draft SEIS

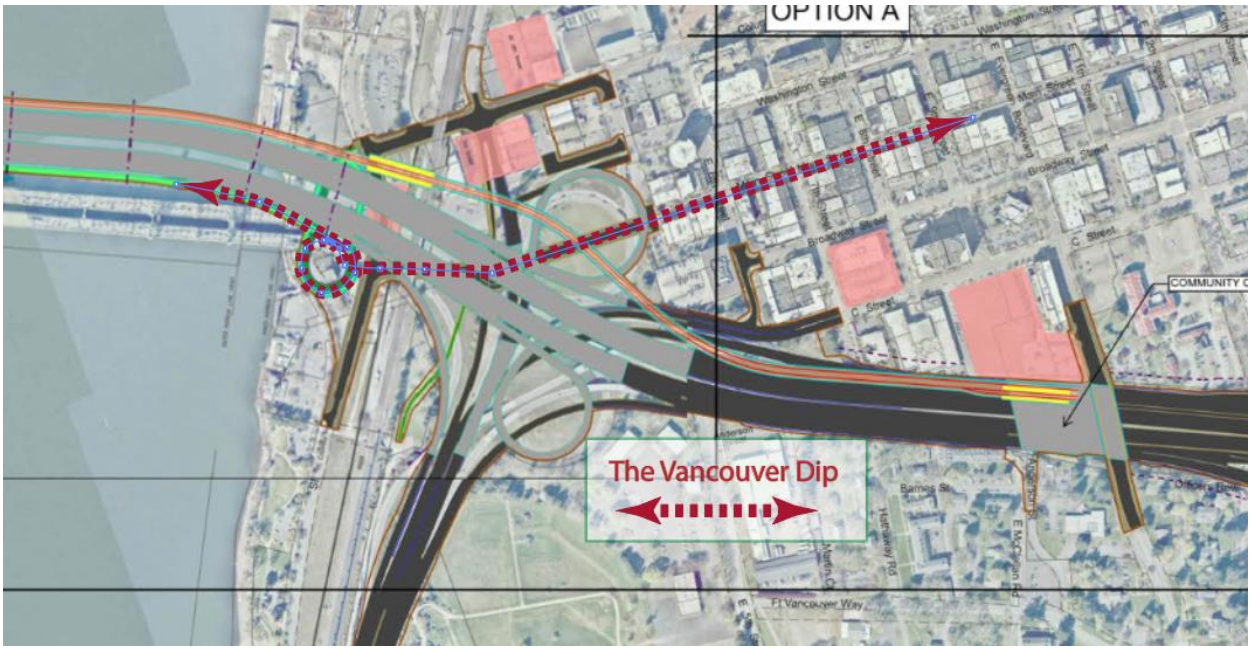
By Linda and Brian Burright

[redacted]
[redacted]

Brian and Linda Burright
Comments on 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.

Submitted 11/18/24
Brian and Linda Burright
[redacted]

IBR Draft SEIS - RECORD #3580 DETAIL

First Name :	Debra
Last Name :	Kalz
Attachments :	DSEIS_3580_Kalz_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #3580 DETAIL

Submission Date : 11/19/2024
First Name : Debra
Last Name : Kalz
Business/Organization/Agency :

Submission Input :

As a Clark County resident since 1971, I have experienced all the issues of the interstate bridge. While it may be old and not earthquake resistant, residents have long wanted a third bridge to bypass the core area of Portland.
The problem with replacing the bridge is not going to fix the key elements of the traffic issues and will increase the drive times. It's clear to drivers that the problem with traffic has long existed at the bottle-neck near the Rose Quarter. It baffles my mind that it still narrows to a two lane road and should have been expanded many years ago. Additionally, the Hwy. 14 ramp is ridiculously short and compounds the flow of traffic.
Clark County citizens have repeatedly told the powers that be that we do not want a light rail, also known as the crime train. When we know that Portland's Max line is millions in debt and does not contribute anything to the purchase of light rail cars for Vancouver, which would be predominantly used in Oregon, at the ridiculous cost above what Portland paid for the light rail cars, why would we want to absorb the cost of them?
The idea of a pedestrian/bike lane is ludicrous as very few people need to cross the bridge to Jantzen Beach. Nobody wants to go there because of crime and lack of shopping interest.
The MAX light rail system in Portland, Oregon had 62,055,600 riders in 2023, or about 208,900 riders per weekday in the second quarter of 2024. Ridership has been increasing, but is still down from its peak of 1.83 million trips per week before the COVID-19 pandemic in March 2020.

Many do not want the tolls as the costs are unacceptable for people who work in a state where they're taxed without representation. In today's economy, we cannot afford the tolls in addition to paying Oregon income taxes, childcare, etc. We can barely afford to buy groceries, let alone pay tolls.
Please cease and desist from pursuing this IBR and look at a better alternative of a third bridge.

Debra Kalz
[redacted]

IBR Draft SEIS - RECORD #3581 DETAIL

First Name :	Robert
Last Name :	Wilson
Attachments :	DSEIS_3581_Wilson_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #3581 DETAIL

Submission Date : 11/18/2024
First Name : Robert
Last Name : Wilson
Business/Organization/Agency :

Submission Input :

First Name:
Robert

Last Name:
Wilson

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
In a time when climate change is increasing and the will to combat is shrinking (and likely to plummet), it is unthinkable that a new transportation project such as the one under consideration shouldn't do everything possible to support active transportation; it appears that the current vision for the Interstate Bridge Replacement Project doesn't do this.
At a minimum, should this project be built, the following should be addressed:

Eliminate the 10-story climb on the Washington side (extend the approach to Evergreen)
Align the transit and multi-use/active transportation path side-by-side to facilitate ease of use/connection
Use transit lanes as buffers between vehicular traffic and bike-ped traffic to reduce noise and increase safety
Thank you

JCA comment #: 959

IBR Draft SEIS - RECORD #3582 DETAIL

First Name :	Gary
Last Name :	Clark
Attachments :	DSEIS-3582_Clark_Original.pdf (5 kb) Effects-of-IBRs-Replacement-Plan-on-the-Elderly.jpg (350 kb)

IBR Draft SEIS - RECORD #3582 DETAIL

Submission Date :	11/18/2024
First Name :	Gary
Last Name :	Clark
Business/Organization/Agency :	Hayden Island Community Safety Initiative

Submission Input :

First Name:
Gary

Last Name:
Clark

Business or Organization:
[redacted]

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
Our organization is against the IBRP bridge designs. The residents on Hayden Island want a simple bridge replacement, not a monster bridge that will pave over a wide swath of our island to make way for a massive interchange requiring 16-18 lanes to get off & on the island and to access I-5. At 30ft above ground, the Hayden Island transit station will also be a huge stair climb for our retirees during elevator outages. Think of the effect your monster bridge will have on our elderly. We demand a smaller, lower cost bridge design without tolls to pay!

Attachment (maximum one):
Effects-of-IBRs-Replacement-Plan-on-the-Elderly.jpg

JCA comment #: 958

IBR Draft SEIS - RECORD #3583 DETAIL

First Name :	Jane
Last Name :	Wimmer
Attachments :	DSEIS_3583_Wimmer_Original.pdf (8 kb) STOP-IBR-I-5-BRIDGE-Replacement-4.jpg (424 kb)

IBR Draft SEIS - RECORD #3583 DETAIL

Submission Date : 11/18/2024
First Name : Jane
Last Name : Wimmer
Business/Organization/Agency :

Submission Input :

First Name:
Jane

Last Name:
Wimmer

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
The currently proposed I-5 bridge replacement is severely outdated as it has been "in the works" for so long and it has missed any projected growth for this area. DO NOT approve this proposal without considering the consequences....

• 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.
• Bridge tolls will impose a heavy and daily financial burden on all adjacent communities.
• 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.

• The 175 ft bridge height will be an eyesore that will detract from the current scenic beauty of the crossing.
• 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.
• The IBR is an area where ground liquefaction is "expected" during a major earthquake. Liquefaction is a major threat to any bridge.
At a minimum: Insist on an additional 120 days for public review & comment, given IBR's refusal to release full bridge information; 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):
STOP-IBR-I-5-BRIDGE-Replacement-4.jpg

JCA comment #: 957

IBR Draft SEIS - RECORD #3584 DETAIL

First Name :	Anna
Last Name :	Fritz
Attachments :	DSEIS_3584_Fritz_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #3584 DETAIL

Submission Date : 11/18/2024
First Name : Anna
Last Name : Fritz
Business/Organization/Agency :

Submission Input :

First Name:
Anna

Last Name:
Fritz

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Other

Comment:
As a Portland resident who frequently uses I5 to get to Washington for both recreational and professional purposes, I am very concerned that this project focus on connecting our communities using mass transit and human powered transportation as much as possible and AVOID expanding the freeway in any way. I am fully supportive of the analysis of The Street Trust and hope that you will listen to and heed their priorities and strategies.

JCA comment #: 956

IBR Draft SEIS - RECORD #3585 DETAIL

First Name :	Alice
Last Name :	Shapiro
Attachments :	DSEIS_3585_Shapiro_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #3585 DETAIL

Submission Date : 11/18/2024
First Name : Alice
Last Name : Shapiro
Business/Organization/Agency :

Submission Input :

First Name:
Alice

Last Name:
Shapiro

Business or Organization:
Portland Raging Grannies

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
Expanding the I5 in any way will not end our traffic problems. The outcome will be to add more toxic pollution

and add to our CO2 load as well which will exacerbate our climate disasters. Our emphasis must be on efficient, affordable and emission free public transportation

JCA comment #: 955

IBR Draft SEIS - RECORD #3586 DETAIL

First Name :	Lynn
Last Name :	Baker
Attachments :	DSEIS_3586_Baker_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #3586 DETAIL

Submission Date : 11/18/2024
First Name : Lynn
Last Name : Baker
Business/Organization/Agency :

Submission Input :

First Name:
Lynn

Last Name:
Baker

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
1. Mass transit both sides of the bridge, with access to either parking or other transit on the Vancouver side. When folks come over and go back for work our neighborhood is impacted; we need to get rid of some of the single occupancy cars, so for me that is crucial.
2. Any design that does not impact river traffic or port use. Pretty would be nice but that's less important.
3. If there is to be a toll, it has to have an ending point, and it needs to not be extended. Figure it out.

JCA comment #: 954

IBR Draft SEIS - RECORD #3587 DETAIL

First Name :	Leslie
Last Name :	Hickey
Attachments :	DSEIS_3587_Hickey_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #3587 DETAIL

Submission Date : 11/18/2024
First Name : Leslie
Last Name : Hickey
Business/Organization/Agency :

Submission Input :

First Name:
Leslie

Last Name:
Hickey

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
It appears that the IBR is operating from a severe sunk cost fallacy. Regardless of how much money has already been spent on the IBR, building a wrong sized/personal vehicle focused bridge would be much more expensive than going back to the drawing board. Using outdated data gathered from years ago, and especially before the pandemic, means that the bridge replacement project is not addressing the current needs of the greater Portland/Vancouver area. We need to embrace the ethos that Oregon built its environmental reputation on, and say no to building oversized freeway connections without adding viable alternatives for transit, pedestrians, and cyclists. We need a bridge for tomorrow (and fifty years from now), not one that was dreamed up in 2005.

JCA comment #: 953

IBR Draft SEIS - RECORD #3588 DETAIL

First Name :	Jane
Last Name :	Wimmer
Attachments :	DSEIS_3588_Wimmer_Original.pdf (8 kb) STOP-IBR-I-5-BRIDGE-Replacement-3.jpg (424 kb)

IBR Draft SEIS - RECORD #3588 DETAIL

Submission Date : 11/18/2024
First Name : Jane
Last Name : Wimmer
Business/Organization/Agency :

Submission Input :

First Name:
Jane

Last Name:
Wimmer

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
Unbelievable! This committee is so biased toward presenting a bridge as the only solution. This is not so! There are any number of cities with rivers and bays that have underground tunnels to ferry between land masses. And it appears that tunneling is an overall sound solution that would be at a much lower cost, a better design from an environmental impact view, and provide the best solution with intentions of managing future growth. The current proposal is "so old and outdated", it is no longer a solution (if it ever was a creditable solution).
I don't think there are/or were any tunnel engineers as part of the committee throughout the planning. And a former committee member that is a bridge engineer does not approve of the proposed bridge replacement as it stands. I trust his analysis of the proposed plan, and that it is a failure on all counts.

Can't trust this committee for a number of reasons, especially since they don't quite answer your questions and aren't willing to provide all the information that they could provide so that the communities being hit hardest with this bridge replacement can make well-informed decisions regarding approval of the plan.

Attachment (maximum one):
STOP-IBR-I-5-BRIDGE-Replacement-3.jpg

JCA comment #: 952

IBR Draft SEIS - RECORD #3589 DETAIL

First Name :	Sarah
Last Name :	Iannarone
Attachments :	2024-11-18-DSEIS-IBR-Comment-The-Street-Trust-JCA.pdf (193 kb)

The Street Trust
PO Box 14745
Portland, OR 97293

November 18, 2024

Interstate Bridge Replacement Program
Attention: Draft SEIS Public Comment
500 Broadway, Suite 200, Vancouver, WA 98660

Director Johnson and the IBR Project Team:

First off, thank you for engaging The Street Trust around the wide variety of planned Active Transportation improvements for people who walk, bike, and roll throughout the IBR DSEIS study area, including proposed enhancements to the system of shared-use paths, bicycle lanes, sidewalks, enhanced wayfinding, and facility improvements to comply with the Americans with Disabilities Act.

The Street Trust is a membership advocacy organization representing street users from across Greater Portland regardless of mode. We work to break political gridlock and win policy and investments that save lives, reduce barriers, and expand mobility and opportunities to the people and neighborhoods our current system neglects.

Our members include public and active transportation experts, advocates, and users dedicated to seeing an Interstate Bridge replacement that includes world class facilities so public and active transportation users have absolute safety and prioritization. To encourage and support walking, biking, rolling and transit, routes and connectivity must be direct, complete, and complement both existing and planned networks.

We are committed to sustainable, multimodal, and equitable transportation solutions. We adopted a fiscal stewardship approach in our analysis which aims to maximize economic efficiencies and steward public resources, aka your tax dollars.

It is our opinion that for the IBR project to meet its goals of accessibility, safety, and inclusivity, a complete and integrated approach to active transportation and transit is essential. By addressing these design priorities now, we can prevent significant accessibility, safety, and environmental issues down the line. The proposed

recommendations will ensure that the bridge serves as a resilient, inclusive, and sustainable investment in public infrastructure which serves generations to come.

As currently proposed, the IBRP fails to meet our minimum standards for minimizing negative impacts, providing adequate alternatives, and effectively mitigating harms of this project on the community. We have organized our concerns in four priority areas:

1. User Access for People Walking, Biking, Rolling
2. Safety, Comfort, and Equitable Multimodal Access
3. Environmental and Climate Impacts
4. Fiscal Responsibility and Economic Benefits

Priority Concern #1: User Access and Experience for People Walking, Biking, Rolling

1. It is critical that the new bridge meets or exceeds active transportation usership goals. For that to happen, the system must be designed to meet the needs of everyone, from eight to eighty years old, and regardless of their ability level. **The current design does not meet this threshold, specifically: connectivity, level of stress/comfort, safety, and operations and maintenance.**

    a. The elevation of the multi-use path crossing the Columbia River is of high concern. 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 challenge is especially made clear on the Vancouver access point. Under current design, active transportation users must descend (lose elevation) as they approach the waterfront, then use a ½ mile long, 4.5% grade circular facility to climb up to the bridge before crossing the Columbia River. We are calling this the “Vancouver Dip.” This is a significant barrier and is ableist in design. The program needs to include a multi-use path at the bridge’s grade from Evergreen (the Vancouver library) to the riverfront so that walkers/rollers/riders have direct access to the bridge. This is an extreme example of out of direction travel that is exacerbated by out of elevation travel.
    b. There is additional out of direction travel for people making trips that combine transit and walking/rolling/biking. Current design places active transportation and transit facilities on opposite sides of the bridge, meaning users using more than one mode have additional out of direction travel getting from one side to the other. These additional distances are especially challenging for people with mobility challenges. Locating the multi-use trail and transit on the same side of the bridge is critical. By ensuring accessibility features, we protect the rights and needs of a broad user base, including non-drivers, low-income residents,

and individuals with disabilities. Additional benefits of placing active transportation and transit on the same side of the bridge include:

i. *Seamless Transition*: Users should easily switch between transit and active transportation at any station, with no grade changes or distance barriers.

ii. *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.

iii. *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.

iv. *Emergency Egress:* The multi-use path should double as an emergency exit route for the transit way, supporting user safety during unexpected events.

v. *Inclusive Design Principles:* These principles ensure the accessibility and usability of both transit and active transportation facilities for individuals of all abilities.

2. **Walking/Biking/Rolling Connectivity to the Main Bridge Multi-use Path from Oregon Mainland** - 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.

3. **Separating Vulnerable Road Users from Freight is Critical** - A distinct separation of walk/bike/roll corridors from freight routes reduces conflicts between these two user groups. For example, the current design for the ramp from Vancouver Way to MLK North poses significant conflict with freight, as the proposed route travels down, across, and back up a freight-heavy on-ramp. Given the Marine Drive interchange is usually described as the most heavily used freight corridor in Oregon, we believe additional alternatives need to be studied that entirely separate walk/bike/roll travel around rather than through this important freight interchange.

4. **Connection to the Interstate Avenue/Expo Way Walk/Bike/Roll Corridor -** The Supplemental Environmental Impact Statement (SEIS) 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 walk/bike/roll corridors to ensure safety and connectivity.

5. **The Marine Drive Single Point Interchange** - The proposed design for the Marine Drive Single Point Interchange presents a potential conflict between bike lanes and freight traffic. We request that additional alternatives be studied, including options that completely remove bike lanes from this interchange and investment of saved funds into further enhancing other connections. These studies should also explore how the project can meet the requirements of the Oregon Bike Bill without relying on the shoulders of MLK and Marine Drive for bike travel. Our research suggests that the Oregon Bike Bill allows for more flexibility in design than the IBR project has acknowledged. We want to make sure that all allowable uses of the required 1% for bike/ped are studied with a focus on promoting vulnerable road user safety.
6. **The Vancouver/Williams Walk/Bike/Roll Corridor is a major north-south bike route in Portland, but its 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. Additional alternatives should be explored in the SEIS to improve this connection. One potential solution is to extend the proposed Union Court separated bike lane further, creating a parallel cycle track or entirely separate path alongside MLK. This path could be located at the toe of the MLK embankment, providing a safe, barrier-separated corridor for both northbound and southbound travel. This would eliminate the need for bike lanes on the shoulders of MLK, significantly separating pedestrian, bike, and roller traffic from freight movements.

   These alternatives were previously proposed to the IBR project and have been studied by the City of Portland. We urge the SEIS to consider them further and to adopt separated facilities, especially in these most dangerous areas of heavy freight movement.
7. **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 together. Having excellent connections with the 40-Mile Loop is important for ease of use and wayfinding. The IBR is improving an important segment of the 40 Mile Loop and we like that! IBR's addition to the 40 Mile Loop Trail connects to the west to the already built separated trail along west bound Marine Drive. This connection is well-designed, offering a safe and direct route for cyclists and pedestrians separated from other traffic. We fully support this.
8. However, **the proposed eastbound connection to the Bridgeton Trail portion of the 40-Mile Loop is not ideal.** 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 not a convenient or efficient connection. We request that alternative designs 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.

Priority Concern #2: Safety, Comfort and Equitable Multimodal Access

The Interstate Bridge Replacement project must prioritize safety, accessibility, and comfort for all users, particularly those using active transportation modes. Our comments must emphasize the need to integrate active transportation and transit facilities closely, ensuring they serve as a cohesive and accessible network. Missteps in this design could lead to significant safety and accessibility issues, which NEPA requires us to address to protect the interests of all impacted populations. If a single-level bridge is chosen, the multi-use path should be positioned on the outer side, adjacent to the transit lanes. This placement would act as a buffer against noise, vibration, and vehicle debris from motor traffic, enhancing user comfort and safety.

9. **Noise and Debris***:* With tens of thousands of high speed car and truck vehicles passing over the bridge daily, active transportation users need protection from road noise and vehicle debris. To meet active transportation user goals, we need a design that protects users from these roadway hazards. Without adequate noise and debris shielding, the bridge environment will be too uncomfortable and even hazardous. Such conditions could discourage walking, biking, and other modes, pushing people towards single-occupancy vehicle use, thereby increasing environmental impacts and reducing the project's alignment with climate resilience goals.
10. **Temperature and Shading:** We know that ambient temperatures on/around the bridge will exceed 100°F in summer months. It is critical that active transportation users have natural and/or human-made shading to mitigate heat and weather impacts on users. Failure to do so could leave the bridge infrastructure unable to serve users effectively and, therefore, miss our active transportation user goals.
11. **Unsheltered homelessness**, which is pervasive across Oregon, can be concentrated in the vicinity of covered projects. A safety and maintenance plan is essential to consider a compassionate, long-term approach that integrates both personal safety measures and supportive services for people experiencing homelessness. This way, the IBR can serve not just as an infrastructure project but also as a supportive space that balances public safety and social responsibility, while keeping our shared multi-use paths clear for use as transportation corridors.

12. **Lighting and Isolation:** People will only use active transportation and transit if they feel safe. As such, lighting throughout the multi-use path project area is critical. Furthermore, placing active transportation and transit facilities together increases the number of people sharing the space and reduces the feelings of vulnerability and isolation, especially at night or during low-traffic periods.
13. **Emergency Access:** We have concerns that medical and police vehicles cannot directly access the multi-use path. Additionally, lack of embedded rail ties prevents ambulances and emergency responders from directly getting to those using the transit system. Furthermore, if emergency responders are expected to access multi-use path and transit users by parking on highway shoulder and scaling a divider, we are concerned that this indicates there is not sufficient separation between automobiles traveling at highway speeds and active transportation modes (see "noise and debris" above).
14. **Grade and Distance**: As mentioned previously, current designs require significant out of direction travel both in terms of distance and grade. It is worth noting that single occupancy vehicle travel experiences little to no out of direction travel while active transportation users in and out of Vancouver experience an additional one mile of out of direction travel each time they navigate the Vancouver Dip. This is an inequitable design.

Priority Concern #3: Environmental and Climate Impacts

Transportation is Oregon's largest source of climate pollution and reducing VMT is a priority for The Street Trust. By building excellent active transportation and transit facilities–and tolling appropriately–this infrastructure project must give world-class options to travelers so they choose non-driving modes of transportation.

15. **Global impacts:** Unfortunately, the proposed design does little to reduce auto travel, estimating a 62% increase in study-area miles we drive (aka vehicle miles traveled or 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 carbon reduction goals

16. **Local impacts:** If this project fails to reduce VMT, local impacts include:
    a. Additional air pollution (greenhouse gas and particulate matter) from internal combustion emissions generated by vehicles
    b. Negative impacts to water quality from chemical, oil, tire particulate, and brake particulate runoff
    c. Additional noise pollution to surrounding communities

Priority Concern #4: Fiscal Responsibility and Economic Benefits

Active and Public Transportation infrastructure can provide a very high return on investment if well designed.

17. **Economies of Combined Systems:** By separating active transportation from light rail, the current project design expends dollars on separate access facilities to both systems. The most significant expenditure is on the spiral ramp connecting active transportation to the Vancouver waterfront and current design does not offer an elevator option to users of the multi-use path.
18. **Long term funding plan for operations and maintenance (O&M) of active transportation facilities*:*** Variable Pricing (aka tolling) generates a revenue stream which can be used to fund operations and maintenance for the active transportation facilities, including but not limited to clearing the right of way of debris, glass, trash, snow and ice, and generally keeping the routes/pathways on the bridge and approaches free of barriers.
19. **The Street Trust strongly urges the IBR project team to implement tolling in the corridor *before* constructing the replacement bridge to manage demand effectively and inform the project design.** Early tolling can immediately reduce traffic volumes, providing critical data to guide the design of the replacement bridge. Managing demand upfront prevents overbuilding and ensures the project addresses long-term needs without inducing unnecessary vehicle trips and generates essential revenue to fund the project, ensuring users contribute directly to the project's construction costs in a time of economic shortfall for Oregon.
20. **Equity and tolling in the I-5 Corridor** Regardless which state manages the IBR toll program, it's imperative that implementation is in accordance with ODOT Equity and Mobility Advisory Committee's Low Income Toll Program Report recommendations, and so that the project enhances rather harms access and mobility for low-income and BIPOC communities. **We need clear policies, oversight, and accountability metrics to ensure that tolls do not disproportionately impact communities of color or low-income communities.**

Sincerely,



Sarah Iannarone | sarah@thestreettrust.org
Executive Director, The Street Trust
Member, Regional Toll Advisory Committee (RTAC)

IBR Draft SEIS - RECORD #3590 DETAIL

First Name :	David
Last Name :	Coburn
Attachments :	DSEIS_3590_Coburn_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #3590 DETAIL

Submission Date : 11/18/2024
First Name : David
Last Name : Coburn
Business/Organization/Agency :

Submission Input :

First Name:
David

Last Name:
Coburn

Business or Organization:
na

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
This project seems out of scope for what is useful. As a frequent driver on the bridge, it's not the choke point. It seems financially irresponsible to focus on adding massive numbers of lanes and interchanges, at a high cost. Right Size the project and leave the resources to other needed projects and programs.

JCA comment #: 950

IBR Draft SEIS - RECORD #3591 DETAIL

First Name :	Tony
Last Name :	Jordan
Attachments :	DSEIS_3591_Jordan_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #3591 DETAIL

Submission Date : 11/18/2024
First Name : Tony
Last Name : Jordan
Business/Organization/Agency :

Submission Input :

First Name:
Tony

Last Name:
Jordan

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Cumulative Effects

Comment:
I support the positions of the Just Crossing Alliance and No More Freeways.

Roads are very long driveways and the more road capacity we build the more space and money we will need to waste on parking and the more space and money we waste on parking, the more roads we need to build. This is a vicious cycle that consumes our land and budgets. It leads to alienation and poverty.

The I5 bridge must be replaced, with a right sized alternative that doesn’t contain massive freeway widening. It needs to include support for other modes and transit that people can take without the need of expensive park and ride garages.

JCA comment #: 949

IBR Draft SEIS - RECORD #3592 DETAIL

First Name :	Deborah
Last Name :	Smith
Attachments :	DSEIS_3592_Smith_Original.pdf (5 kb)

IBR Draft SEIS - RECORD #3592 DETAIL

Submission Date :	11/19/2024
First Name :	Deborah
Last Name :	Smith
Business/Organization/Agency :	

Submission Input :

Do not shove this down our throats! The public needs input. Do the homework with actual costs and impacts on commuters, surrounding neighborhoods, with a realist ending date to collect the funds needed. Plan for the future!

This isn’t New York City. Mass transit is viable here! We need our cars and to be able to afford to get to work!

Deborah H. Smith

IBR Draft SEIS - RECORD #3593 DETAIL

First Name :	Jesse
Last Name :	Weeg
Attachments :	DSEIS_3593_Weeg_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #3593 DETAIL

Submission Date : 11/18/2024
First Name : Jesse
Last Name : Weeg
Business/Organization/Agency :

Submission Input :

First Name:
Jesse

Last Name:
Weeg

Email:
[redacted]

Topic Area:
Transportation

Comment:
Thankyou for hearing our concerns. I am excited for what this new bridge can be. As you know Climate change is an existential threat. Every government action should keep this in mind. That being said, The new I-5 bridge can be a shining star and an example of multimodal travel. It needs to have a welcoming and user-friendly bike/walking path. Commuters their own car should not be prioritized over other means of travel. In order for this to happen I am in agreement with the suggestions of Oregon walks and the Street Trust. I agree that the multimodal path should be accessible to the light rail. I think that the current plan to have a 100 foot path down to the ground from the bike path is obscene.Travel by foot/bike or transit should be prioritized not punished with a grueling climb.

Additionally I humbly request that along the multimodal lane that there are rest points. It would be so amazing to have multiple bump outs large enough for 5 people to stand out of the way of travel and to rest and take in the views. This bridge can be an asset and attraction. Having areas for benches and informative plaques would be an educational tool and allow for travelers to have a unique view. I encourage you to think about 50 years from now traveling on the bridge and noting what you are so thankful the planners included. The sellwood bridge and tilikum bridge both have these and they could be even better.

Thankyou for all your hard work. I am excited to see the best version we can have

JCA comment #: 948

IBR Draft SEIS - RECORD #3594 DETAIL

First Name :	Jordan
Last Name :	Lewis
Attachments :	DSEIS_3594_Lewis_Original.pdf (10 kb)

IBR Draft SEIS - RECORD #3594 DETAIL

Submission Date : 11/18/2024
First Name : Jordan
Last Name : Lewis
Business/Organization/Agency :

Submission Input :

First Name:
Jordan

Last Name:
Lewis

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Environmental Justice

Comment:
The Interstate Bridge Replacement project intends to destroy up to 76 households and over 40 workplaces in north Portland and Vancouver, including a 33-unit apartment building in downtown Vancouver and an entire floating home neighborhood in Hayden Island. The Uniform Act exists for a reason, and displacement of residents is acceptable when it is done in the name of some pro-social or broadly beneficial development. The issue is, this project as designed is neither of those things, on balance. The IBR tries to use 2 miles of light-rail

and active transportation to greenwash the larger project, and this seems convincing at first glance. On further inspection, the 4.5 miles of freeway expansion (as many as 4 lanes!) make clear the priorities of the project: car dependence, increased vehicle-miles-traveled (and therefore emissions) and an enriching of the highway construction & trucking lobby at the expense of local communities, our climate, and our children's larger future.

In exchange for this bleaker future, we will endure the eviction of dozens of families (during a housing crisis no less), the loss of jobs and services for the disenfranchised residents of Hayden Island, and the [redacted] of the Vancouver waterfront as a 10-story freeway towers overhead (when was the last time YOU hung out under the marquam bridge?). The evicted residents may be compensated "fair market value" for their houses under the Uniform Act, but those houses are going to have extraordinarily low values; the residents will likely have to move far from the urban core to afford rent at these rates. The residents who arent totally displaced will face even lower values as freeway right-of-way encroaches on their property, removes mature tree walls which function as road noise walls, and subterranean work causes lasting damage to properties through impacts such as cracked foundations.

What will happen to the residents of Luepke Senior Center, who are currently shielded from the Existing i-5 Pollution and Road Noise by a mature tree wall right along the property edge?

What will happen to Clark County residents who regularly go to the Regal City Center Cinemas, which will be destroyed by the project (of which I am one)?

Why should those seeking treatment at the Vancouver VA Medical center on 4th plain blvd endure the externalities of more lanes, when we know that we can move more people, faster, with different modes than single occupancy vehicles?

My demand from this project is that residential displacements are truly minimized, especially the 33-unit Normandy Apartments on C street. We cannot repeat the mistakes of the 20th century here. If we absolutely MUST displace these people, it should at least come with significant multimodal options along the ENTIRE corridor, such as bike/ped facilities that connect to the Vancouver/Williams Corridor, and MAX system improvements that allow the train to be a time-competitive & reliable alternative to single-occupancy vehicles. Pedestrian facilities and transit facilities should be adjacent so as to be easily transferred between, and the spiral ramp on the waterfront (a frictional barrier to active transportation) NEEDS replaced with a pleasantly graded connection direct to downtown Vancouver. Finally, we need the footprint reduced, both through no new "auxiliary" lanes along the entire project area, and the phasing of project elements so that non-relevant interchange rebuilds (unpopular) are not bundled into the replacement of the bridge (broadly popular).

JCA comment #: 947

IBR Draft SEIS - RECORD #3595 DETAIL

First Name :	Anna
Last Name :	Fritz
Attachments :	DSEIS_3595_Fritz_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #3595 DETAIL

Submission Date : 11/18/2024
First Name : Anna
Last Name : Fritz
Business/Organization/Agency :

Submission Input :

First Name:
Anna

Last Name:
Fritz

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Climate Change

Comment:
The replacement of the Interstate Bridge should NOT be an excuse to expand the freeway. Please focus on increasing and improving options for human powered transportation and mass transit. More lanes for private automobiles only increases the amount of cars on the road and takes us even faster toward climate catastrophe.

JCA comment #: 946

IBR Draft SEIS - RECORD #3596 DETAIL

First Name :	Mary
Last Name :	McClain
Attachments :	DSEIS_3596_McClain_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #3596 DETAIL

Submission Date : 11/18/2024
First Name : Mary
Last Name : McClain
Business/Organization/Agency :

Submission Input :

First Name:
Mary

Last Name:
McClain

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
We're eager to see the Interstate Bridge Replacement Program be built. But pleas include those of us who walk, bike, and ride the Light Rail. Many of us can't afford a car,. Many of us are concerned about climate change and want to encourage car-fee transportation to reduce our use of fossil fuels. It's so much healthier for us to travel without cars - healthier for our bodies and for our planet.

JCA comment #: 945

IBR Draft SEIS - RECORD #3597 DETAIL

First Name :	Sarah
Last Name :	Iannarone
Attachments :	Street Trust_Original.pdf (233 kb) Street Trust_Other.pdf (22 mb)

The Street Trust
PO Box 14745
Portland, OR 97293

November 18, 2024

Interstate Bridge Replacement Program
Attention: Draft SEIS Public Comment
500 Broadway, Suite 200, Vancouver, WA 98660

Director Johnson and the IBR Project Team:

First off, thank you for engaging The Street Trust around the wide variety of planned Active Transportation improvements for people who walk, bike, and roll throughout the IBR DSEIS study area, including proposed enhancements to the system of shared-use paths, bicycle lanes, sidewalks, enhanced wayfinding, and facility improvements to comply with the Americans with Disabilities Act.

The Street Trust is a membership advocacy organization representing street users from across Greater Portland regardless of mode. We work to break political gridlock and win policy and investments that save lives, reduce barriers, and expand mobility and opportunities to the people and neighborhoods our current system neglects.

Our members include public and active transportation experts, advocates, and users dedicated to seeing an Interstate Bridge replacement that includes world class facilities so public and active transportation users have absolute safety and prioritization. To encourage and support walking, biking, rolling and transit, routes and connectivity must be direct, complete, and complement both existing and planned networks.

We are committed to sustainable, multimodal, and equitable transportation solutions. We adopted a fiscal stewardship approach in our analysis which aims to maximize economic efficiencies and steward public resources, aka your tax dollars.

It is our opinion that for the IBR project to meet its goals of accessibility, safety, and inclusivity, a complete and integrated approach to active transportation and transit is essential. By addressing these design priorities now, we can prevent significant accessibility, safety, and environmental issues down the line. The proposed

recommendations will ensure that the bridge serves as a resilient, inclusive, and sustainable investment in public infrastructure which serves generations to come.

As currently proposed, the IBRP fails to meet our minimum standards for minimizing negative impacts, providing adequate alternatives, and effectively mitigating harms of this project on the community. We have organized our concerns in four priority areas:

1. User Access for People Walking, Biking, Rolling
2. Safety, Comfort, and Equitable Multimodal Access
3. Environmental and Climate Impacts
4. Fiscal Responsibility and Economic Benefits

Priority Concern #1: User Access and Experience for People Walking, Biking, Rolling

1. It is critical that the new bridge meets or exceeds active transportation usership goals. For that to happen, the system must be designed to meet the needs of everyone, from eight to eighty years old, and regardless of their ability level. **The current design does not meet this threshold, specifically: connectivity, level of stress/comfort, safety, and operations and maintenance.**

    a. The elevation of the multi-use path crossing the Columbia River is of high concern. 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 challenge is especially made clear on the Vancouver access point. Under current design, active transportation users must descend (lose elevation) as they approach the waterfront, then use a ½ mile long, 4.5% grade circular facility to climb up to the bridge before crossing the Columbia River. We are calling this the “Vancouver Dip.” This is a significant barrier and is ableist in design. The program needs to include a multi-use path at the bridge’s grade from Evergreen (the Vancouver library) to the riverfront so that walkers/rollers/riders have direct access to the bridge. This is an extreme example of out of direction travel that is exacerbated by out of elevation travel.
    b. There is additional out of direction travel for people making trips that combine transit and walking/rolling/biking. Current design places active transportation and transit facilities on opposite sides of the bridge, meaning users using more than one mode have additional out of direction travel getting from one side to the other. These additional distances are especially challenging for people with mobility challenges. Locating the multi-use trail and transit on the same side of the bridge is critical. By ensuring accessibility features, we protect the rights and needs of a broad user base, including non-drivers, low-income residents,

and individuals with disabilities. Additional benefits of placing active transportation and transit on the same side of the bridge include:

i. *Seamless Transition*: Users should easily switch between transit and active transportation at any station, with no grade changes or distance barriers.

ii. *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.

iii. *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.

iv. *Emergency Egress:* The multi-use path should double as an emergency exit route for the transit way, supporting user safety during unexpected events.

v. *Inclusive Design Principles:* These principles ensure the accessibility and usability of both transit and active transportation facilities for individuals of all abilities.

2. **Walking/Biking/Rolling Connectivity to the Main Bridge Multi-use Path from Oregon Mainland** - 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.

3. **Separating Vulnerable Road Users from Freight is Critical** - A distinct separation of walk/bike/roll corridors from freight routes reduces conflicts between these two user groups. For example, the current design for the ramp from Vancouver Way to MLK North poses significant conflict with freight, as the proposed route travels down, across, and back up a freight-heavy on-ramp. Given the Marine Drive interchange is usually described as the most heavily used freight corridor in Oregon, we believe additional alternatives need to be studied that entirely separate walk/bike/roll travel around rather than through this important freight interchange.

4. **Connection to the Interstate Avenue/Expo Way Walk/Bike/Roll Corridor -** The Supplemental Environmental Impact Statement (SEIS) 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 walk/bike/roll corridors to ensure safety and connectivity.

5. **The Marine Drive Single Point Interchange** - The proposed design for the Marine Drive Single Point Interchange presents a potential conflict between bike lanes and freight traffic. We request that additional alternatives be studied, including options that completely remove bike lanes from this interchange and investment of saved funds into further enhancing other connections. These studies should also explore how the project can meet the requirements of the Oregon Bike Bill without relying on the shoulders of MLK and Marine Drive for bike travel. Our research suggests that the Oregon Bike Bill allows for more flexibility in design than the IBR project has acknowledged. We want to make sure that all allowable uses of the required 1% for bike/ped are studied with a focus on promoting vulnerable road user safety.
6. **The Vancouver/Williams Walk/Bike/Roll Corridor is a major north-south bike route in Portland, but its 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. Additional alternatives should be explored in the SEIS to improve this connection. One potential solution is to extend the proposed Union Court separated bike lane further, creating a parallel cycle track or entirely separate path alongside MLK. This path could be located at the toe of the MLK embankment, providing a safe, barrier-separated corridor for both northbound and southbound travel. This would eliminate the need for bike lanes on the shoulders of MLK, significantly separating pedestrian, bike, and roller traffic from freight movements.

   These alternatives were previously proposed to the IBR project and have been studied by the City of Portland. We urge the SEIS to consider them further and to adopt separated facilities, especially in these most dangerous areas of heavy freight movement.
7. **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 together. Having excellent connections with the 40-Mile Loop is important for ease of use and wayfinding. The IBR is improving an important segment of the 40 Mile Loop and we like that! IBR's addition to the 40 Mile Loop Trail connects to the west to the already built separated trail along west bound Marine Drive. This connection is well-designed, offering a safe and direct route for cyclists and pedestrians separated from other traffic. We fully support this.
8. However, **the proposed eastbound connection to the Bridgeton Trail portion of the 40-Mile Loop is not ideal.** 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 not a convenient or efficient connection. We request that alternative designs 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.

Priority Concern #2: Safety, Comfort and Equitable Multimodal Access

The Interstate Bridge Replacement project must prioritize safety, accessibility, and comfort for all users, particularly those using active transportation modes. Our comments must emphasize the need to integrate active transportation and transit facilities closely, ensuring they serve as a cohesive and accessible network. Missteps in this design could lead to significant safety and accessibility issues, which NEPA requires us to address to protect the interests of all impacted populations. If a single-level bridge is chosen, the multi-use path should be positioned on the outer side, adjacent to the transit lanes. This placement would act as a buffer against noise, vibration, and vehicle debris from motor traffic, enhancing user comfort and safety.

9. **Noise and Debris***:* With tens of thousands of high speed car and truck vehicles passing over the bridge daily, active transportation users need protection from road noise and vehicle debris. To meet active transportation user goals, we need a design that protects users from these roadway hazards. Without adequate noise and debris shielding, the bridge environment will be too uncomfortable and even hazardous. Such conditions could discourage walking, biking, and other modes, pushing people towards single-occupancy vehicle use, thereby increasing environmental impacts and reducing the project's alignment with climate resilience goals.
10. **Temperature and Shading:** We know that ambient temperatures on/around the bridge will exceed 100°F in summer months. It is critical that active transportation users have natural and/or human-made shading to mitigate heat and weather impacts on users. Failure to do so could leave the bridge infrastructure unable to serve users effectively and, therefore, miss our active transportation user goals.
11. **Unsheltered homelessness**, which is pervasive across Oregon, can be concentrated in the vicinity of covered projects. A safety and maintenance plan is essential to consider a compassionate, long-term approach that integrates both personal safety measures and supportive services for people experiencing homelessness. This way, the IBR can serve not just as an infrastructure project but also as a supportive space that balances public safety and social responsibility, while keeping our shared multi-use paths clear for use as transportation corridors.

12. **Lighting and Isolation:** People will only use active transportation and transit if they feel safe. As such, lighting throughout the multi-use path project area is critical. Furthermore, placing active transportation and transit facilities together increases the number of people sharing the space and reduces the feelings of vulnerability and isolation, especially at night or during low-traffic periods.
13. **Emergency Access:** We have concerns that medical and police vehicles cannot directly access the multi-use path. Additionally, lack of embedded rail ties prevents ambulances and emergency responders from directly getting to those using the transit system. Furthermore, if emergency responders are expected to access multi-use path and transit users by parking on highway shoulder and scaling a divider, we are concerned that this indicates there is not sufficient separation between automobiles traveling at highway speeds and active transportation modes (see "noise and debris" above).
14. **Grade and Distance**: As mentioned previously, current designs require significant out of direction travel both in terms of distance and grade. It is worth noting that single occupancy vehicle travel experiences little to no out of direction travel while active transportation users in and out of Vancouver experience an additional one mile of out of direction travel each time they navigate the Vancouver Dip. This is an inequitable design.

Priority Concern #3: Environmental and Climate Impacts

Transportation is Oregon's largest source of climate pollution and reducing VMT is a priority for The Street Trust. By building excellent active transportation and transit facilities–and tolling appropriately–this infrastructure project must give world-class options to travelers so they choose non-driving modes of transportation.

15. **Global impacts:** Unfortunately, the proposed design does little to reduce auto travel, estimating a 62% increase in study-area miles we drive (aka vehicle miles traveled or 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 carbon reduction goals

16. **Local impacts:** If this project fails to reduce VMT, local impacts include:
    a. Additional air pollution (greenhouse gas and particulate matter) from internal combustion emissions generated by vehicles
    b. Negative impacts to water quality from chemical, oil, tire particulate, and brake particulate runoff
    c. Additional noise pollution to surrounding communities

Priority Concern #4: Fiscal Responsibility and Economic Benefits

Active and Public Transportation infrastructure can provide a very high return on investment if well designed.

17. **Economies of Combined Systems:** By separating active transportation from light rail, the current project design expends dollars on separate access facilities to both systems. The most significant expenditure is on the spiral ramp connecting active transportation to the Vancouver waterfront and current design does not offer an elevator option to users of the multi-use path.
18. **Long term funding plan for operations and maintenance (O&M) of active transportation facilities*:*** Variable Pricing (aka tolling) generates a revenue stream which can be used to fund operations and maintenance for the active transportation facilities, including but not limited to clearing the right of way of debris, glass, trash, snow and ice, and generally keeping the routes/pathways on the bridge and approaches free of barriers.
19. **The Street Trust strongly urges the IBR project team to implement tolling in the corridor *before* constructing the replacement bridge to manage demand effectively and inform the project design.** Early tolling can immediately reduce traffic volumes, providing critical data to guide the design of the replacement bridge. Managing demand upfront prevents overbuilding and ensures the project addresses long-term needs without inducing unnecessary vehicle trips and generates essential revenue to fund the project, ensuring users contribute directly to the project's construction costs in a time of economic shortfall for Oregon.
20. **Equity and tolling in the I-5 Corridor** Regardless which state manages the IBR toll program, it's imperative that implementation is in accordance with ODOT Equity and Mobility Advisory Committee's Low Income Toll Program Report recommendation (inline below), and so that the project enhances rather harms access and mobility for low-income and BIPOC communities. **We need clear policies, oversight, and accountability metrics to ensure that tolls do not disproportionately impact communities of color or low-income communities.**

Sincerely,



Sarah Iannarone | sarah@thestreettrust.org
Executive Director, The Street Trust
Member, Regional Toll Advisory Committee (RTAC)

Oregon Toll Program

Low-Income Toll Report:

Options to Develop a Low-Income Toll Program and Best Practices for Implementation

A Report to the Oregon Legislature

September 2022







Urban Mobility STRATEGY

Oregon Department of Transportation

Prepared for:

Oregon Department of Transportation

Prepared by:

WSP USA
1300 SW 5th Avenue, Suite 3100
Portland, OR 97201

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Nếu quý vị muốn thông tin về dự án này được dịch sang tiếng Việt, xin gọi 503-731-4128.

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如果您想了解这个项目，我们有提供简体中文翻译，请致电: 503-731-4128

The information in this document, and the public and agency input received, may be adopted or incorporated by reference into a future environmental review process to meet the requirements of the National Environmental Policy Act.

Project Team Staff

Oregon Department of Transportation

Director Kris Strickler

Travis Brouwer, Assistant Director, Revenue, Finance & Compliance

Cooper Brown, Assistant Director, Operations

Lindsay Baker, Assistant Director, Government and External Relations

Maureen Bock, Chief Innovation Officer and Interim Toll Program Director

Brendan Finn, Director, Urban Mobility Office

Amy Joyce, DMV Administrator

Raymond Mabey, Interstate Bridge Replacement Program

Erika McCalpine, Assistant Director, Social Equity

Della Mosier, Deputy Director, Urban Mobility Office

Amanda Pietz, Policy, Data and Analysis Division Administrator

Daniel Porter, Budget, Economics and Debt Services Section Manager

Carolyn Sullivan, Chief Administrative Officer

Mandy Putney, Urban Mobility Office Strategic Initiatives Director

Karyn Criswell, Public Transportation Division Administrator

Kevin Glenn, Communications Director

Erik Havig, Planning Section Manager

Nicholas Herrera, Debt and Financial Analysis Program Manager

Kayla Hootsmans, Legislative Coordinator

Karen McCarty, Business Systems Support Manager

Galen McGill, State Maintenance & Operations Engineer

Garet Prior, Toll Policy Manager

Amy Ramsdell, Commerce and Compliance Division Administrator

Mark Sauer, Chief Information Officer

Rian Windsheimer, Region 1 Manager

Project Team Staff (cont.)

Equity and Mobility Advisory Committee (EMAC)

Abe Moland (representative of Clackamas County Health and Transportation)

Amanda Garcia-Snell (Washington County Community Engagement)

Bill Baumann (representative of Community in Motion)

Diana Avalos Leos (representative of League of United Latin American Citizens Latino Youth Conference)

Philip Wu (Oregon Environmental Council)

Dwight Brashear

Eduardo Ramos (At-large member)

Fabian Hidalgo Guerrero (Causa)

Germaine Flentroy (Beyond Black/Play, Grow, Learn)

Ismael Armenta (At-large member)

James Paulson (WorkSystems, Inc.)

John Gardner (TriMet)

Kari Schlosshauer (At-large member)

Michael Espinoza (Portland Bureau of Transportation)

Park Woodworth (Ride Connection)

Consultant Team

WSP

Heather Wills

Anne Pressentin

Brooke Jordan

Gabor Debreczeni

Zoie Wesenberg

Andrew Nelson

Adela Mu

Sadie Mae Palmatier

Aliza Whalen

Kara Todd

Jeff Crisafulli

Michael Babin

Jessie Jones

Laura Lamorette

Emily Wolff

Kearns & West

Kirsten Hauge

Madeline Kane

Sylvia Ciborowski

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Gillian Garber-Yonts

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Acronyms and Abbreviations

ALICE	Asset Limited, Income Constrained, Employed
AMI	Area median income
BIPOC	Black, indigenous, and people of color
DMV	Oregon Driver and Motor Vehicle Services
EBT	Electronic Debit Transfer
EMAC	Equity and Mobility Advisory Committee
FPL	Federal poverty level
HB	House Bill
HUD	U.S. Department of Housing and Urban Development
I-	Interstate
Integrated ONE	Integrated Oregon Eligibility Program
LIFE	LA Metro Low-Income Fare is Easy
MSA	Metropolitan statistical area
NEPA	National Environmental Policy Act
OAR	Oregon Administrative Rules
ODOT	Oregon Department of Transportation
OHP	Oregon Highway Plan
ORS	Oregon Revised Statute
OTC	Oregon Transportation Commission
report	Low-Income Toll Report
SFCTA	San Francisco County Transportation Authority
SNAP	Supplemental Nutrition Assistance Program
SSS	Self-Sufficiency Standard for Oregon
STRAC	Statewide Toll Rule Advisory Committee
TANF	Temporary Assistance for Needy Families
TIMMA	Treasure Island Mobility Management Agency
TriMet	Tri-County Metropolitan Transportation District of Oregon
VDOT	Virginia Department of Transportation
VOT	Value of time
WSDOT	Washington State Department of Transportation

Executive Summary

The Low-Income Toll Report ("report") for the Oregon Toll Program was developed by the Oregon Department of Transportation (ODOT) at the direction of the Oregon Legislature.[1] *The Equity and Mobility Advisory Committee (EMAC) helped inform this report. House Bill (HB) 2017 provided direction to implement tolling on I-5 and I-205 in the Portland metro area, and ODOT's Toll Program was established to oversee state-operated toll projects and policies throughout the state. Currently, the Toll Program is planning to administer three state-operated toll projects: the I-205 Toll Project, the Regional Mobility Pricing Project, and the Interstate Bridge Replacement Program. The latter project is being developed in partnership with the Washington State Department of Transportation (WSDOT).*

[1] "Enrolled House Bill 3055," Sec 162, State of Oregon, 2021. https://olis.oregonlegislature.gov/liz/2021R1/Downloads/MeasureDocument/HB3055/Enrolled

As directed by the Oregon Legislature, this report presents an approach for developing a low-income toll program as part of the Oregon Toll Program. It presents "options for consideration," which detail specific options on the income threshold for a low-income toll rate, in addition to options for the type of benefit (e.g., discounts, credits, a number of free trips). It also describes proposed "implementation practices," which include best practices for implementation of an equitable, inclusive toll system. Based on engagement with stakeholders, research, and technical analysis, this report considers the benefits to people experiencing low-incomes, program costs, and trade-offs of different options. The report also outlines next steps to determine how the low-income toll program will function. Additional work to develop and operationalize the low-income toll program includes defining program components, creating an operations plan that includes staffing, and aligning the low-income toll program with overall Toll Program development. As part of Toll Program development, ODOT has committed to providing a low-income toll program the first day tolling begins, which is planned for the end of 2024 as part of the I-205 Toll Project.

This report is the result of the work of ODOT, the OTC, and community and project partners over multiple years to address the impacts of the planned toll projects on people experiencing low incomes. In combination with the Oregon Highway Plan (OHP) amendment and coordination and collaboration with EMAC, this report is part of a larger effort to initiate tolling in a way that attempts to move beyond avoiding burdens, and to shift to a system of more equitable payment for transportation. The report also recognizes that past land use and transportation investments in the Portland metro area—including highway investments—have resulted in negative cultural, economic, and relational impacts on local communities and populations.



Options for Consideration

Provide a significant toll discount (i.e., credits, free trips, percentage discount, tax credit, or full exemption) for households with incomes equal to or below 200% of the federal poverty level.

People experiencing low incomes face difficult daily choices for meeting basic needs (e.g., paying for food, transportation, shelter, clothing, or healthcare). A sizable toll discount would help alleviate the burden of choosing between paying a toll and meeting those basic needs. This option received strong support from EMAC and through public feedback. Research shows that 200% of the federal poverty level is commonly used to determine eligibility for existing low-income benefits programs in Oregon and nationally.

Provide a smaller, more focused toll discount (i.e., credits, free trips, percentage discount, tax credit, or full exemption) for households with incomes above 200% and up to 400% of the federal poverty level.

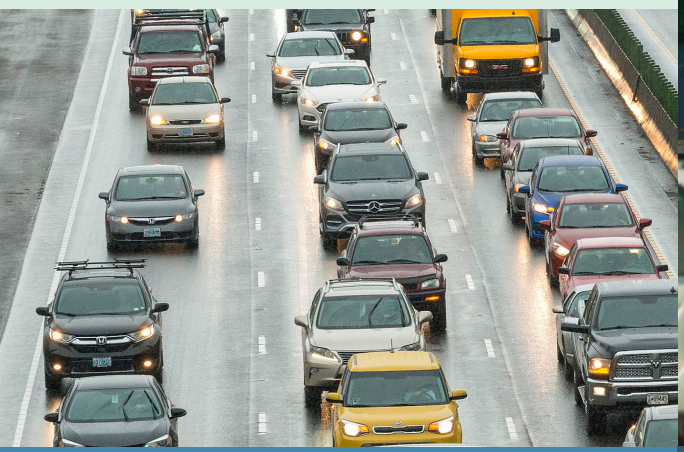
Households with incomes just above 200% of the federal poverty level may still struggle to meet basic needs. Providing a more focused discount would help alleviate the burden of toll expenses. People in this income bracket may experience income that fluctuates throughout the year or varies year to year; therefore, this benefit would offer some reassurance of continued benefits despite that fluctuation. National best practice supports avoiding eligibility restrictions where small differences in income drastically change the level of benefit.

Respondents from a spring 2022 survey supported providing a benefit above 200% of the federal poverty level.[2] In addition, EMAC and project partners expressed support for benefits for participants with household incomes above 200% and up to 400% of the federal poverty level. EMAC agreed that including two income ranges to meet different needs is worth the additional complexity for program implementation.

[2]The survey was developed prior to case study research and regional economic analysis that informed income threshold considerations. While survey respondents were asked about 300% of the federal poverty level (see Table 3-1), the upper income limit was revised to 400% of the federal poverty level to reflect additional research findings regarding cost of living.

Use a verification process that leverages existing programs and further explore self-certification to qualify for program enrollment (or toll discounts).

Qualification through existing low-income service programs or self-certification improves the ease of enrollment for applicants and can reduce ODOT's enrollment administrative cost burden and data privacy risk. For example, partnering with the Integrated Oregon Eligibility Program (Integrated ONE) may alleviate some enrollment administrative burdens of partnering with numerous programs while providing comprehensive coverage of existing programs. Additional work is needed to understand the potential risk and impact of program fraud related to self-certification, and the efficacy and trade-offs of fraud prevention strategies. EMAC and community partners strongly support a self-certification model that streamlines the low-income toll program enrollment process.





Next Steps and Implementation Practices

ODOT, in collaboration with the OTC and community partners, has additional work to do to identify specific benefits for people experiencing low incomes and to operationalize the low-income toll program to ensure the benefits are in place before tolling begins. The low-income toll program will be built out through a variety of program milestones. Ultimately, decision-making authority on the income-based adjustments lies with the OTC and will occur through the rate-setting process after further robust public engagement and analysis of traffic and revenue impacts. This section provides an overview of next steps for development of the low-income toll program and provides considerations for implementing the program

2.1 Next Steps

The following list identifies key Toll Program milestones and explains how they will inform development of the low-income toll program.

Income thresholds and discount options will be further analyzed and discussed as part of the toll projects.

- The toll projects will further analyze discount and income threshold options in the traffic and revenue studies to help understand how the low-income benefits change the base traffic and revenue forecasts. These analyses will incorporate additional data and assumptions related to demographics, enrollment, travel frequency, and revenue leakage. The findings from the traffic and revenue studies, in combination with engagement and additional research, will help inform the income threshold and type of benefit that is advanced for implementation.
- **Timing**: The traffic and revenue studies involve three levels of analysis with increasing rigor, time and costs. The Final Traffic and Revenue Study is expected to be available in 2024 for the I-205 Toll Project and in 2025 for the Regional Mobility Pricing Project.



EMAC Foundational Statement: To the greatest degree possible, investments that are necessary to advance equity must be delivered at the same time as highway investments and be in place on day one of tolling or before.

The OTC will establish the income thresholds and discount type(s) for the low-income toll program, as well as the rules for enrollment, verification, interoperability, and enforcement through the rulemaking and rate-setting process.

- The Statewide Toll Rule Advisory Committee (STRAC) will review changes to Oregon Administrative Rules ("rules") and provide feedback to ODOT on the process to set toll rates. This process will be informed by traffic and revenue studies, which will incorporate assumptions for the low-income toll program and identify the potential impacts on congestion management and revenue generation. The practices for implementation presented in this report will inform the rules for enrollment, verification, interoperability, and enforcement.
- **Timing:** The STRAC will be established in late 2022 and will develop recommendations through the end of 2023. The OTC will adopt toll rates and rules in 2024 for the I-205 Toll Project.

Development of the back-office system and operations management will inform the administration cost, viability, and timing of the discount and/or credit and implementation practices.

- The back-office system can be designed to operationalize the discount type and income thresholds that are selected, in addition to enrollment and verification rules. As ODOT, EMAC, and community partners discuss discount types, operations management specialists will continue to provide guidance on administrative costs. The goal is to avoid benefits that are more costly to operationalize than the benefit received by the customer. Once the program is established, a public outreach campaign, focused on reducing barriers to enrollment, will begin to inform potentially eligible customers.
- **Timing:** The back-office system configuration will occur in parallel with the STRAC process, which will occur from fall 2022 to the end of 2023.



EMAC will continue its role in advising the OTC and ODOT on how to operationalize the low-income toll program and support enrollment.

- EMAC will continue to review and provide feedback to ODOT and the OTC as more information becomes available through the two toll projects and the rate-setting process. EMAC will also work with ODOT in preparing to implement the low-income toll program to help ensure people with the greatest need have access to the program. Once the low-income toll program is established and enrollment can begin, ODOT, in coordination with community partners, will connect with and enroll customers. EMAC recommends the low-income toll program should be in place on day one of tolling or before.

- **Timing:** EMAC will continue meeting and providing feedback to ODOT and the OTC from fall 2022 through at least 2023.

ODOT will continue to monitor statewide policy, including the OHP amendment, to ensure it supports the low-income toll program.

- The purpose of the OHP amendment is to provide clarity around pricing and tolling to recognize new opportunities and support potential implementation, among other policy updates.

- **Timing:** ODOT anticipates that the OTC will adopt the OHP amendment in late fall 2022 to inform the rulemaking and rate setting process.

In partnership with program participants and community-based organizations, ODOT will monitor, review, and adjust the low-income toll program after tolling begins to ensure it is meeting equity and project goals.

- After the low-income toll program is implemented, program performance will be reviewed through ongoing traffic and revenue monitoring, engagement with eligible program participants, and partnerships with community-based organizations. Programmatic review may include adjusting the program if it does not adequately meet equity and project goals, improving customer service, and/or identifying opportunities to increase enrollment. Experience from Virginia's program shows that a steering committee or equity panel for programmatic review can help people experiencing low incomes continue to shape the program. Additionally, in July 2022 OTC accepted EMAC's recommended actions, which included continued support for a toll equity accountability committee (or another structure) that provides a forum for equity voices to monitor, evaluate, and provide feedback on enrollment in and economic impacts of the low-income toll program over time.

- **Timing**: Monitoring would begin in coordination with the start of tolling, which is planned for 2024 for the I-205 Toll Project and 2025 for the Regional Mobility Pricing Project.



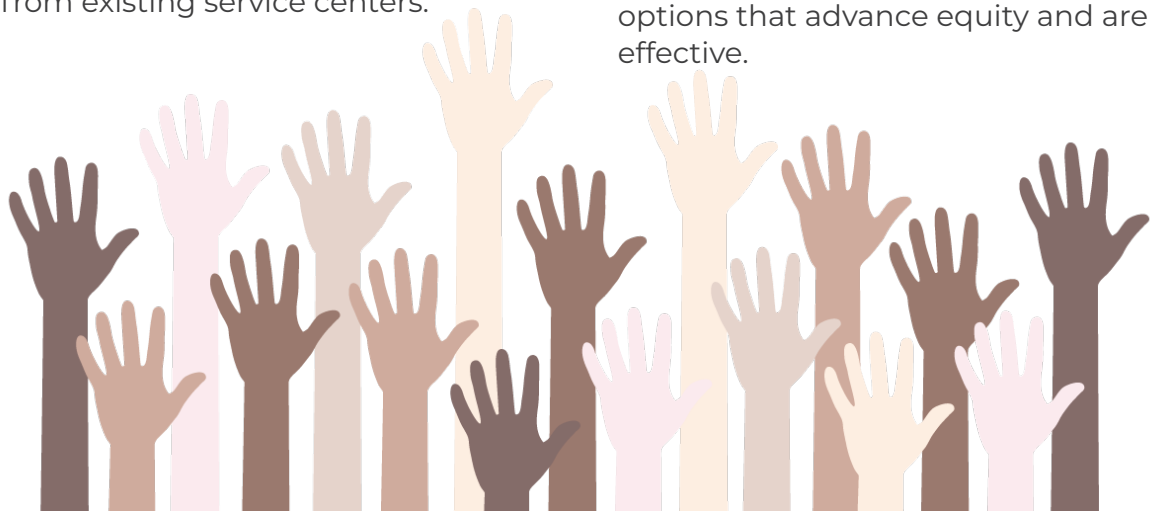
2.2 Implementation Practices

ODOT's review of national research on low-income toll programs and discussions with EMAC and community partners yielded two key findings and informed the list of implementation practices:

- Low-income toll programs are drastically under-enrolled.
- Benefits must be substantial enough to meet the needs of people experiencing low incomes.

Based on EMAC's recommendations and the analysis of practices to promote inclusion, accessibility, and enrollment, the following practices outline key considerations for developing the system to support the low-income toll program:

- Provide free transponders and work with community-based organizations to help enroll people.
- Do not require a minimum dollar amount of balance to load or maintain the transponder account.
- Provide a cash-based option for toll payment.
- Conduct extensive marketing, promotion, and engagement with community-based organizations that begins at least 6 months before tolling starts. Post signage to help travelers make informed decisions.
- Create an in-person and online enrollment process that accommodates participants with disabilities, who have limited technology access or training, who speak languages other than English, and who live far away from existing service centers.
- Support a monitoring, review, and adjustment process for the low-income toll program that includes community voices and a process that is aligned with the Oregon Toll Program's Equity Framework.
- Offer education opportunities, additional time to pay toll charges, and multiple notices of account balances, and/or set a maximum penalty amount.
- Consider equity implications in the development of a concept of operations that includes the process for penalties that users are subject to for toll violations (i.e., initial penalty followed by a failure to comply penalty).
- Further work is needed to identify the administration cost and operational viability for each of these practices. This information is necessary to guide the selection of options that advance equity and are cost effective.



Chapter 1: Introduction

This chapter introduces the purpose, legislative directive, and context for the report, in addition to previous work on addressing concerns about tolling related to people experiencing low incomes and the significant challenges and considerations for a low-income toll program. It also includes the engagement and decision-making for the program and the next steps for implementation.

1.1 Purpose

This report provides options for consideration and planned elements for the implementation of equitable, income-based tolls in Oregon. Tolling is planned to begin at the end of 2024 as part of the I-205 Toll Project.

This report is a culmination of multiple years of work by ODOT, the OTC, and community and project partners to address the impacts of the proposed toll projects on people experiencing low incomes. The report summarizes the engagement, analysis, and research conducted thus far to inform the options for consideration and implementation practices. Focused engagement with the OTC, stakeholders, and the public occurred throughout summer 2022 to inform and refine the options for consideration and implementation practices presented in the final report.

In 2021, the Oregon Legislature passed HB 3055, which requires ODOT to "implement a method for establishing equitable income-based toll rates" before tolling begins.

1.2 Background

The following sections provide background on the legislative requirements directing this report, ODOT's Urban Mobility Strategy, and related work efforts leading up to the final report.

1.2.1 Legislative Requirements (HB 3055)

In 2021, the Oregon Legislature passed HB 3055, which requires ODOT to "implement a method for establishing equitable income-based toll rates" before tolling begins. The first toll project for the Oregon Toll Program is planned to begin tolling at the end of 2024. HB 3055 also requires that ODOT produce a report on the method for establishing equitable income-based toll rates before September 15, 2022. The legislative direction for the report is as follows:

> *REPORT ON EQUITABLE INCOME-BASED TOLL RATES*
>
> *SECTION 162. (1) As used in this section, "toll" and "tollway" have the meanings given those terms in ORS [Oregon Revised Statute] 383.003.*
>
> *(2) Before the Department of Transportation assesses a toll, the department shall implement a method for establishing equitable income-based toll rates to be paid by users of tollways.*
>
> *(3) At least 90 days before the date the Oregon Transportation Commission seeks approval from the Federal Highway Administration to use the income-based toll rates developed under subsection (1) of this section, the department shall prepare and submit a report on the method developed to the Joint Committee on Transportation and the Oregon Transportation Commission. The department may also submit to the Joint Committee on Transportation any recommended legislative changes. The report shall be provided to the Joint Committee on Transportation, in the manner provided under ORS 192.245, on or before September 15, 2022.*
>
> *SECTION 163. Section 162 of this 2021 Act is repealed on January 2, 2023.*

1.2.2 ODOT's Urban Mobility Strategy

ODOT's Urban Mobility Strategy aims to improve everyday travel in the Portland area through a cohesive set of projects and investments, shown in Figure 2-1. The Urban Mobility Strategy is led by the Urban Mobility Office and primarily functions to manage traffic congestion with tolling, reduce highway bottlenecks through capital construction, and invest in multimodal transportation in ways that serve ODOT's goals of addressing equity, climate change, congestion relief, and safety.

Current core projects include I-5 Rose Quarter Improvement, I-205 Improvements Project, I-205 Toll Project, Regional Mobility Pricing Project, I-5 Boone Bridge and Seismic Improvement Project, Oregon 217 Auxiliary Lanes Project, Interstate Bridge Replacement Program, and investments in transit and in rolling and pedestrian paths, all of which will contribute to building a seismically resilient and modern transportation system. As a part of these core projects, tolling will be central to ODOT's long-term strategy to manage congestion and sustainably raise revenue for roadway and multimodal investments in the Portland metro area.

Oregon Toll Program

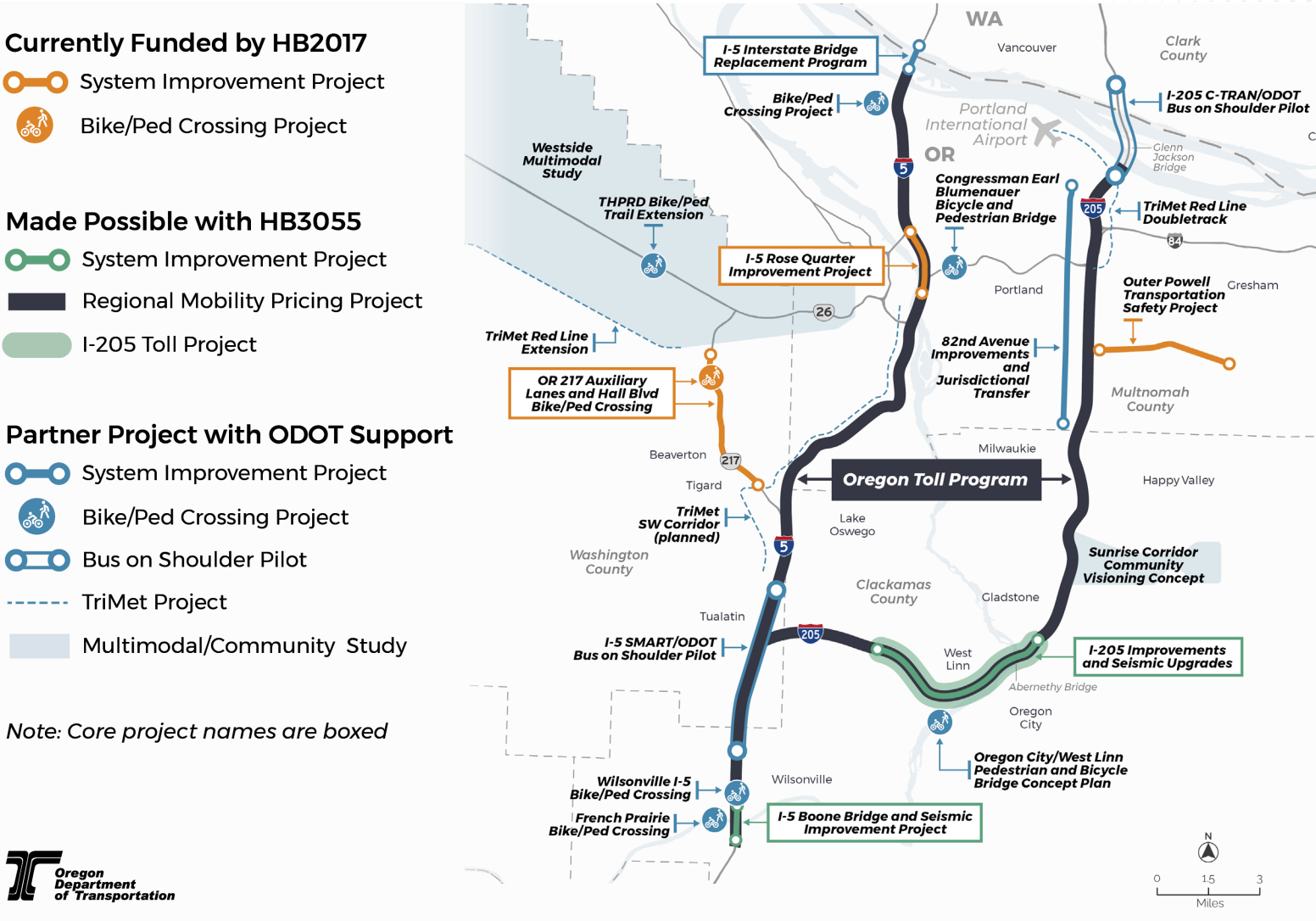
The Oregon Toll Program currently includes two projects: the I-205 Toll Project and the Regional Mobility Pricing Project.

- The I-205 Toll Project would toll Interstate 205 (I-205) near the Abernethy and Tualatin River Bridges to raise revenue for construction of the planned I-205 Improvements Project and manage congestion between Stafford Road and Oregon Route 213 to give travelers a better and more reliable trip.
- The Regional Mobility Pricing Project would apply congestion pricing[3] on all lanes of I-5 and I-205 in the Portland metro area to manage traffic congestion in a manner that will generate revenue for future transportation investments. The project area begins just south of the Columbia River and ends before the Boone Bridge over the Willamette River in Wilsonville.

[3] "Congestion pricing," or variable-rate tolling, describes a type of tolling that aims to improve mobility, travel times, and reliability by charging a higher price during peak traffic periods. The higher fee—typically implemented along with transit and other multimodal improvements—encourages some drivers to consider using other travel options, such as carpools or transit, or to change their travel time to other, less-congested times of the day, or not to make the trip at all.

While there are currently only three planned toll projects in Oregon, this report seeks to establish a broad framework that is flexible to adapt to future projects statewide yet effective and precise enough move beyond avoiding burdens and shift to a system of more equitable payment for transportation when tolling begins in the Portland metro area.

Figure 1-1. Urban Mobility Strategy Projects Map



1.2.3 Previous Work on Low-Income Tolls

ODOT and the OTC began working on how toll projects should mitigate impacts on people experiencing low incomes in 2017. Highlights of this work include the following:

- From 2017 to 2018, ODOT and the OTC convened a Policy Advisory Committee to provide input on the Value Pricing Feasibility Analysis. The Policy and Advisory Committee reviewed existing research and identified the need to address cost impacts on people experiencing low incomes as a priority strategy.
- In 2020, the OTC chartered the Equity and Mobility Advisory Committee (EMAC) to provide recommendations on transportation needs of and benefits for people of color and people experiencing low incomes, with limited English proficiency, or experiencing a disability who live near or travel through the project area.
- From 2020 to 2021, with support from ODOT and the OTC, EMAC conducted research on case studies of other toll programs to inform a set of performance measures for ODOT to incorporate into both toll project analysis and an initial list of policy options.
- In late 2021, EMAC, ODOT, and the OTC agreed on a set of Foundational Statements to address equity and mobility needs for the Oregon Toll Program, which include providing transportation options, addressing both climate and equity needs, offering toll-free travel options, creating a user-friendly program that is in place once tolling begins, ensuring that benefits extend to southwest Washington, and coordinating with regional partners. The Foundational Statements serve as one building block for the options outlined in this report.
- ODOT, the Joint Policy Advisory Committee on Transportation, and Metro Council have committed to supporting a list of "Commitments for ODOT and Regional Partners" (Ordinance 21-1467) and a Letter of Agreement (dated April 25, 2022) to center equity in their process and outcomes.
- In July 2022, EMAC submitted recommendations to the OTC, which included actions that build from and connect to the Foundational Statements. The OTC accepted EMAC's recommended actions, providing strategic direction to ODOT to center equity using these actions as the basis for future decisions.
- This report is also informed by ODOT's work in equity through the Office of Social Equity and direction identified in the Strategic Action Plan.



1.3 Report Development and Engagement

To develop this report, ODOT partnered with EMAC and engaged with the Washington State Department of Transportation (ODOT's partner on the Interstate Bridge Replacement Program), social service agencies, transit and multimodal transportation providers, and statewide, local, and regional stakeholders. ODOT also sought community input through discussion groups and an online survey. Chapter 4 details the findings of this effort and the list of stakeholders and organizations ODOT engaged with. The Regional Mobility Pricing Project Spring 2022 Engagement Report will include a full engagement summary, including feedback received.

1.3.1 Engagement and Decision-Making

Because tolling I-5 and I-205 in the Portland region has statewide impacts (and beyond), ODOT strived to reach as many people as possible. The team conducted an online survey that received over 12,000 responses, seven interviews with representatives from social survey providers, one discussion group with community-based organizations and nine discussion groups with historically excluded and underserved community members. To capture the robust engagement, ODOT developed a three-step iterative process to develop and finalize the report **(Figure 1-2)**.

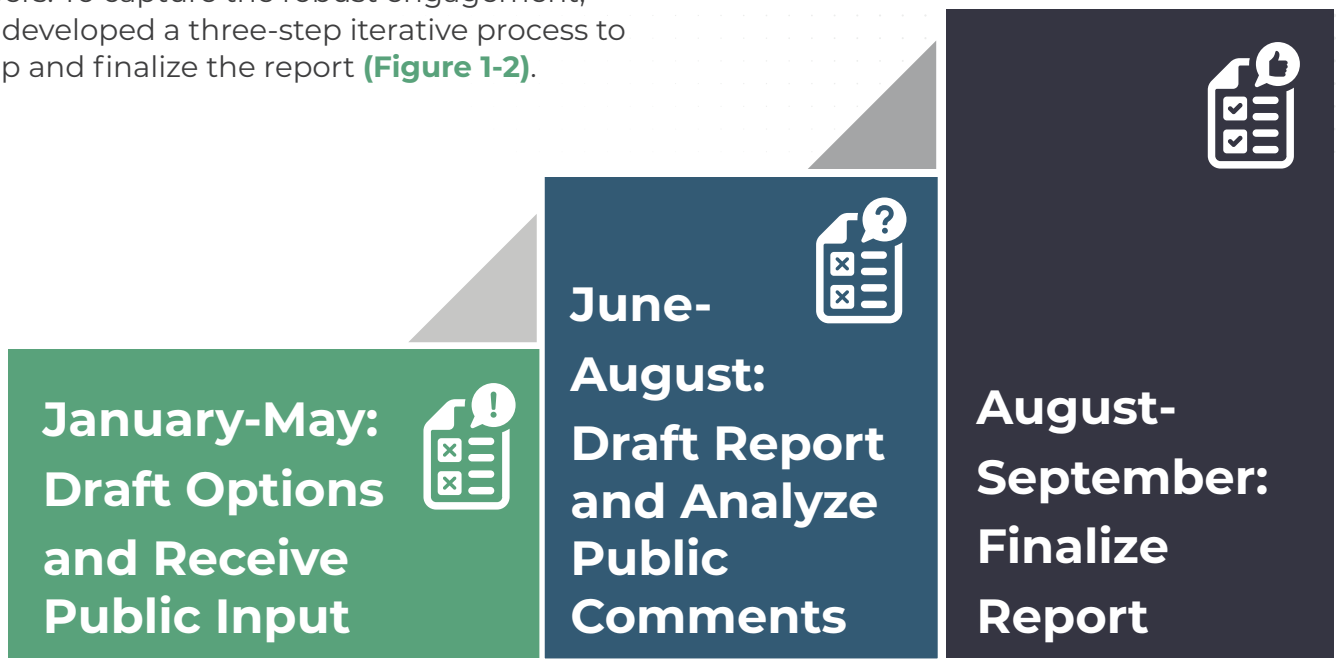


Figure 1-2. Three-Step Process for the Low-Income Toll Report

Guiding Questions

The following questions were developed in coordination with EMAC and project partners to ensure that this report addresses the key questions ODOT has been hearing from the community:

- At what level of income should ODOT provide a price discount from tolling?
- Should the discount be a partial credit, full exemption, somewhere in between, or a combination?
- How can ODOT provide toll-free travel options to avoid further burdening people experiencing low incomes who are struggling to meet basic needs (food, shelter, clothing, healthcare)?
- Research shows that income-based toll programs are drastically under-enrolled. What are the barriers to enrollment (privacy, access, lack of information, etc.) and how can they be addressed?
- How can Oregon's tolling be a user-friendly system that is clear and easy to use by people of all backgrounds and abilities, including linguistic diversity, and by those without internet access?
- How can benefits extend across state lines?
- This will be a new program for ODOT. What are issues that need to be addressed for administration and implementation on day one of tolling?
- How will the low-income toll program be monitored and adjusted so that it provides easy access and a low barrier for the customers experiencing low-income it was intended to benefit?



1.4 Key Terms and Concepts

Table 1-1. Definitions of Key Terms and Concepts

Key Term	Definition*
Account holder	The individual who is financially responsible for paying the toll costs incurred during travel in the tolled area.
Administrative costs	Expenses incurred to support low-income toll program operations.
Enrollment	An individual is considered "enrolled" in the program when they have a transponder account and can utilize benefits of the low-income toll program. The enrollment process may include income verification (see definition).
Eligibility	Qualification for participation in the low-income toll program, as determined by the account holder's yearly household income.
Exemption	Free from an obligation to pay any toll costs.
Free trip(s)	A set number of free trips are applied to a transponder account on a recurring basis (e.g., 10 free trips in the tolled area per month).
Income verification	The process to determine that an applicant's household income is within the eligible income range. This report discusses the following methods for verifying income: proof of income (such as a paystubs), enrollment in another approved low-income benefit program (such as the Supplemental Nutrition Assistance Program [SNAP]), or self-certification (see definition).
Income threshold	Eligible household income for program participation (e.g., Households with comes below the federal poverty level).
Self-certification	The practice of an account holder officially declaring (by submitting a self-attestation form) their household income complies with the low-income program income threshold without needing to provide additional evidence. Self-certification of income sometimes requires applicants to agree to possible periodic auditing.
Toll credit	A credit applied to a transponder account on a recurring basis (e.g., a $25 toll credit applied to the transponder account every 6 months).
Toll discount	A reduction applied to the assessed toll for each trip (e.g., 50% discount on a $3 toll would result in the driver paying $1.50). A toll discount is applied as the trip is charged, so the driver would pay the discounted price.
Transaction costs	The cost incurred by the toll operator to process the toll fee and low-income benefit, if applicable.

*The examples provided in this list of definitions are illustrative and not determined program features.

Chapter 2: Equity and Mobility Advisory Committee

This chapter includes an overview of Equity and Mobility Advisory Committee (EMAC) and its role in developing the low-income toll program, including its Foundational Statements that guide the Oregon Department of Transportation's (ODOT) work to ensure equitable mobility in the toll projects. It summarizes EMAC's recommendations on three topics: analysis of the toll projects, the low-income toll program, and operating the overall Toll Program. All of these recommendations are designed to center equity in the Oregon Toll Program.

To ensure equitable Regional Mobility Pricing Project and I-205 Toll Project processes, and to help develop an equity framework, the OTC convened the Equity and Mobility Advisory Committee. This committee is a group of individuals with professional or lived experience in equity and mobility coming together to advise the Oregon Transportation Commission and ODOT on how tolls on the I-205 and I-5 freeways, in combination with other demand management strategies, can include benefits for populations that have been historically and are currently underrepresented or underserved by transportation projects. Among EMAC's tasks was the development of strategies to address the transportation needs of, and benefits for, people of color, people experiencing low incomes, people with limited English proficiency, and people experiencing a disability who live near or travel through the project area.

EMAC's initial work resulted in the adoption of an Equity Framework to identify the burdens and benefits of tolling and provide a process for determining how to equitably distribute those burdens and benefits from the toll projects. The Equity Framework acknowledges how past land-use and transportation investments in the Portland metro area have resulted in negative cultural, health, economic, and relational impacts on the following local communities and populations:

- People experiencing low-income or economic disadvantage
- Black, indigenous, and people of color (BIPOC)
- Older adults and children
- Persons who speak languages other than English, especially those with limited English proficiency
- Persons experiencing a disability
- Other populations and communities historically excluded and underserved by transportation projects



2.1 Informing the Low-Income Toll Program



EMAC reviewed research about toll projects and low-income programs to inform development of the options for consideration. Elements of these other programs that were considered by EMAC included eligibility standards, discount or credit allocations, and geographic distribution of benefit. The resulting input and the EMAC Foundational Statements provided the basis for the options for consideration and implementation practices outlined in this report (see Appendix A).

ODOT began to develop this report while the EMAC recommendations were in draft form and has refined the report to reflect the final EMAC recommendations delivered to the Oregon Transportation Commissioner in July 2022. EMAC members have also provided feedback on online survey questions, participated in discussion groups, provided input to confirm the report topic areas and questions, shared reactions to preliminary findings, and expressed support for the report options for consideration. The following sections outline the way EMAC gathered information to make decisions and the nature of its guidance for developing options for the low-income toll program, describe the feedback provided by an EMAC subcommittee convened to review a draft of this report, and summarize key EMAC feedback on the draft of this report.

2.2 EMAC Advice and Feedback

Throughout 2021, ODOT supported EMAC with research documents that included a literature review, examples of toll projects throughout the United States, and feedback received from the community about how toll projects have address affordability. The following list provides links to these resources:

- Affordability Research
- Affordability Policy and Strategy Options (1st Round)
- Affordability Performance Measures
- Affordability Workshop (Video)

EMAC identified robust ideas during discussions relating to toll project analysis, the low-income toll program, and Oregon Toll Program. The following EMAC input is directly applicable to this report:

- Look beyond the standard federal definition of "low-income." For the toll projects' federal environmental review process (i.e., National Environmental Policy Act [NEPA]), a measure of 200% of the federal definition for poverty was assumed. This should be the baseline for future consideration. The reality is that people move below and above the federal definition for poverty in a short span of time.
- Implement an income-based toll program that is progressive in nature, meaning that higher-income drivers will pay a larger share or percentage of household income than lower-income drivers.
- In addition to drivers who are people experiencing low incomes, provide toll payment credits, exemptions, or discounts for:
    - » Public transit vehicles and registered vanpools and carpools
    - » Public emergency response vehicles and non-emergency medical transportation
    - » Social service or nonprofit health organizations to recruit and retain volunteer drivers
- Find the right balance between discounts and/or exemptions and revenue generation to advance equity. Specifically, analyze the trade-offs between exemptions, credits, or discounted rates based on income versus collecting the toll revenues and investing them into equity and mobility strategies. This may include an analysis of trade-offs in the time between when I-205 tolling starts and when the regional I-5 and I-205 toll system (i.e., Regional Mobility Pricing Project) comes online.

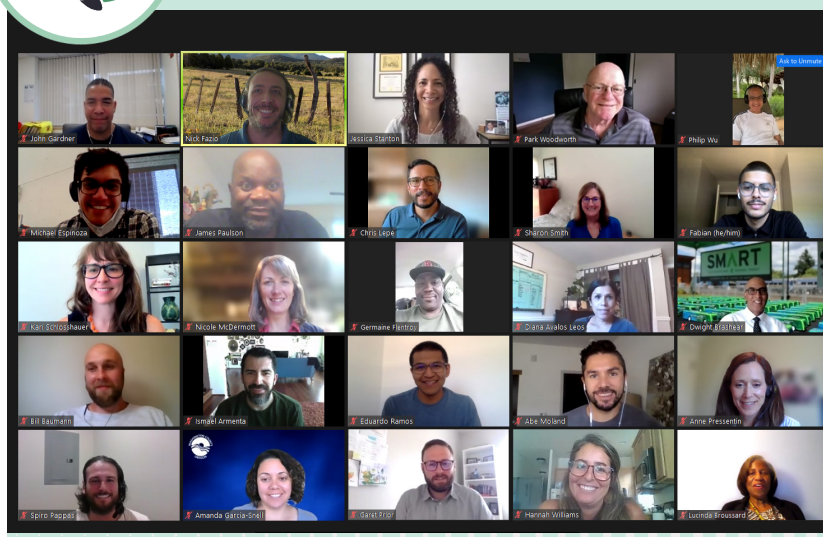
- Equity Framework-identified communities should be involved in the analysis and decision-making process on determining what would best advance equity.
- Design and implement an interoperable and easy-to-use fare/payment system across geographic boundaries and transportation options.
- Coordinate between Oregon and Washington, as well as across bike, scooter, carpooling, car sharing options, and park-and-ride lots. Look at Rideshare Online as an example of rideshare and vanpool services that serve Oregon and Washington. Likewise, TriMet's Hop card is an example of a system that accommodates users in Oregon and Washington.
- Commit to offering additional time to pay a toll bill without incurring fines, and study options for effectively doing so. Tolling should not contribute to more financial indebtedness for people experiencing low incomes, nor should it lead to criminal penalties.
- Follow the precedent set by ODOT's Rose Quarter Improvement Project to include a baseline for Disadvantaged Business Enterprise investment that goes beyond the federal requirement.
- Provide a cash-based option for paying tolls in order to reduce payment barriers, including among the unbanked.
- Ensure the process of applying for exemptions, discounted rates, or credits considers varying degrees of technological competency and access. ODOT should account for internet reliability in rural areas and how that could affect access to services online (e.g., loading transponders, applying for exemptions, etc.).
- Set a zero or low minimum-balance requirement for loading or maintaining transponders. Transponders should also be free or should come pre-loaded with credits to cover the cost of the purchase. The cost of a transponder can be a barrier to purchase for people experiencing low incomes.

2.3 EMAC Feedback on Draft Report Development

A subcommittee of EMAC members reviewed information on the technical analysis and the results of public engagement related to a low-income toll policy. The members provided input and feedback on a draft of this report at two subcommittee meetings in April and May of 2022. Feedback on draft options for consideration included the following:

- Support for a sizable benefit at 200% of the federal poverty level and a smaller benefit above 200% and up to 400% of federal poverty level.
- Agreement that including two income eligibility levels is worth the additional complexity so that different needs can be met.
- Varied support for offering a free option. Supportive members referenced the current and historic regressive transportation funding structure as well as the extreme economic needs at the lowest of incomes. Opposing members raised concerns about the climate impacts of incentivizing driving and de-incentivizing transit, the history of free social service benefit programs, and a feeling that all users should contribute some amount.
- Strong support for a self-certification model that streamlines the low-income toll program benefit enrollment process.

EMAC developed and delivered a set of recommendations to the Oregon Transportation Commission in July 2022. The Oregon Transportation Commission accepted EMAC's recommendation actions pertaining to affordability, which are reflected in this report.



2.4 EMAC Feedback on the Draft Report

Following the release of the draft report for public comment, a subcommittee of EMAC members provided feedback in July 2022. Their feedback included general report comments and specific questions not covered in the draft report. Key comment themes included the following:

- Strong support for self-certification. Supportive members agreed that fears of fraud are overstated and programmatic emphasis should be on accessibility, not punitive enforcement.
- Concern about access to transponders. Members suggested multiple distribution channels including pickup at local retail locations and dispensing through local community-based organizations.
- Agreement that 400% of the federal poverty level is an appropriate maximum income threshold. Members suggested communicating this threshold in yearly or hourly income to help the public recognize program benefits.
- Acknowledgment of the consequences and benefits with all discount options. Improvements can be made over time to find the right balance between transportation benefits and equity.



Chapter 3: Stakeholder Engagement Results

This chapter summarizes key themes from various engagement methods, including stakeholder interviews with low-income service providers, a public survey, and discussion groups with historically excluded and underserved groups. This feedback was central to developing the report's options for consideration.

The Oregon Department of Transportation (ODOT) engaged stakeholders through a variety of methods and with numerous audiences. The stakeholder engagement activities and key themes from each activity are summarized in the following sections.

3.1 Stakeholder Interviews and Discussion Groups

ODOT conducted seven interviews[4] to gather information from social service providers and state, local, and federal programs that serve people experiencing low incomes. The purpose of the interviews was to help inform implementation practices for determining eligibility and designing an accessible, inclusive low-income toll program.

ODOT partnered with the Community Engagement Liaisons Program to conduct focused, meaningful engagement with historically excluded and underserved groups. Trusted leaders from various communities held eight discussion groups with individuals or groups who identify as a youth, people experiencing disabilities, Latin American, Russian/Slavic, Chinese, Vietnamese, Black/African American, and Black, indigenous, and people of color (BIPOC). Participants were asked for their perspectives on options for the low-income toll program, preferences on enrollment and application process, and potential barriers to participating in the program.

ODOT also held a discussion group with eight representatives[5] from seven community-based organizations serving Equity Framework communities. Participants were asked about potential barriers to participation in a low-income toll program and best practices for enrollment from other programs for people experiencing low incomes.



[4]Interview participants included representatives from Neighborhood House, Health Share of Oregon, Native American Youth and Family Center, TriMet, Portland Housing Bureau, Housing and Urban Development, and Oregon Housing and Community Services.

[5]Community-based organization discussion group participants included representatives from Black United Fund of Oregon, Community Alliance of Tenants, East County Rising, Immigrant and Refugee Community Organization, Oregon Latino Health Coalition, Ride Connection, and Portland Community Reinvestment Initiatives.

3.1.1 Key Themes

The following key themes emerged from stakeholder interviews and discussion groups:

- Address the many barriers that may exist for potential applicants to enroll for low-income benefits. Several participants noted significant barriers for these types of programs include language, technology access, lack of a bank account, time, effort, and complexity of the application. Many people reiterated the importance of simplicity and ease because the process of applying for these types of programs can be a substantial barrier unto itself.
- Provide many options to demonstrate eligibility for a low-income discount. Several people encouraged automatic enrollment through other programs such as the Supplemental Nutrition Assistance Program (SNAP) or self-certification.
- Make the application centralized and easy to complete and track. Application hubs such as the Online Enrollment System help to reduce the burden on applicants. Provide participants many ways to apply, pay for services, and connect with services.
- Offer many application options and in multiple languages. While many participants suggested a web form or app to apply, many others noted the importance of providing variety of options to accommodate the varying needs of potential applicants.
- Partner with low-income programs and other resources for the program to be successful. Participants highlighted the importance of working with community-based organizations and cross-marketing with similar programs to help spread the word to communities through trusted sources and to increase enrollment in low-income programs. Additionally, provide resources for staff and funding for community-based organizations and other trusted organizations such as schools and libraries to support enrollment.
- Concern about the definition of "low income." In several groups, people mentioned the challenges of using typical income standards as a way to demonstrate eligibility because they do not account for many living costs, such as rent or ongoing medical expenses. Some people also noted that federal poverty guidelines may not be appropriate because Portland is more expensive than other parts of Oregon and the United States.





- Provide low-income discounts, but some concern was expressed about fairness. Some participants noted that people experiencing low incomes may use the tolled roadways less and so have less need for a discount than working families or people at other income levels who still have financial hardships. They said that all income levels should pay the same toll rate.
- Consider the unique transportation needs of other user groups such as seniors living on fixed incomes or people living with disabilities who depend on others for transportation or who have specific transportation needs, as well as immigrants experiencing language barriers or without documentation.
- Provide discount and credit options, but some concern was expressed about a transit credit. Participants commented that transit was not a realistic option for them due to availability of service or schedule considerations. Some stakeholders expressed concern that if people were already using transit, they would not be likely to drive on tolled facilities and therefore would be less likely to be affected by a toll.
- Consider more ideas for types of discounts and how toll discounts could work, such as offering a certain number of free trips per month instead of credits, an unlimited monthly pass, or income-tax credits for tolls.
- Conduct an awareness and education campaign. Several participants mentioned that it was important to make sure people know about the program. They noted many people do not have time or energy to seek these programs out, so an outreach and education campaign is important.
- Provide multiple options for toll payment, including paying with cash. Several participants noted that there are people experiencing low incomes who may use only cash on a regular basis and may not have bank accounts.
- Provide support for those who cannot make toll payments to avoid impacts from fines or penalties. Participants were concerned families experiencing low incomes may be charged with impactful penalties or fines if they missed receiving a toll bill by mail.

3.2 Online Survey

An online survey was publicly available from April 28 to May 16, 2022 and received over 12,000 responses. ODOT advertised[6] the survey as an opportunity for the public to share feedback to shape congestion pricing and advance equity, including developing a toll discount or credit for people experiencing low incomes. The survey included two multiple-choice questions related to the Low-Income Toll Report, asking who should be eligible for the low-income discount or credit and the level of agreement with options for a low-income toll program.

In addition, an open-ended write-in question was provided at the end of the survey for respondents to share any additional feedback with decision-makers and project planners about congestion pricing. There were over 8,000 responses to this write-in question, and of those there were 146 comments and ideas related to the Low-Income Toll Report.

One of the goals of this engagement phase was to increase awareness of tolling in Oregon, garner broad participation, and engage with as many members of the public as possible. The survey was not designed to be statistically representative, meaning the respondent sample is not predictive of the opinions of the Portland metro area population as a whole. Participants were not chosen at random, but instead opted in to take the survey. Thus, as is common with self-selection surveys, it is likely that respondents held stronger opinions about tolling or could experience greater impacts from tolling when compared to the general population.

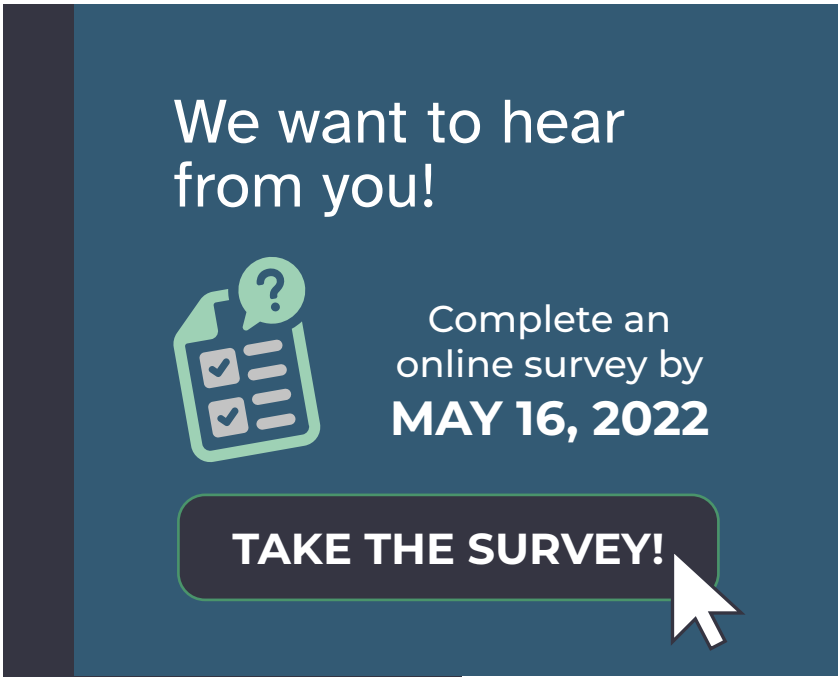


Image from an ad for the online survey that was publicly available from April 28 to May 16, 2022

[6]Activities to help invite participation in the online survey included: digital and print ads in regional and multicultural publications; social media posts, including ads in Spanish; website notices and newsletter updates; outreach toolkits to partners; tabling events at food pantries; and presentations at various transportation meetings in the Portland region and statewide.

3.2.1 Key Themes

ODOT tabulated survey results for all respondents and for respondents who reported household annual incomes under $50,000. Key themes related to benefits and eligibility are shown in **Table 3-1**. Full results are included in the *Regional Mobility Pricing Project Spring 2022 Engagement Report*.

Survey respondents were asked who should be eligible for a low-income discount or credit. As shown in **Table 3-1**, many respondents (55%) preferred some type of eligibility threshold. The most common preference was an eligibility threshold of 300% of the federal poverty level (FPL) (36%), while 19% preferred an eligibility threshold of 200% FPL. Across nearly all demographics, there was significantly more preference for eligibility at 300% FPL. Several groups were more likely to choose one of the presented eligibility thresholds. Among those respondents who bike/roll, walk, take transit, and people with household incomes under $50,000, approximately 70% opted to select one of the eligibility thresholds.

Table 3-1: Key Themes from Survey Respondents – Eligibility (N = 11,050)

Theme: Eligibility[1]	All Respondents	Households under $50,000/year
Under 300% Federal Poverty Level (FPL)	36%	47%
Under 200% FPL	19%	25%
Neither	33%	20%
I don't have a preference / prefer not to answer	12%	8%

[1] Survey question: Who should be eligible for a low-income discount or credit?
FPL = federal poverty level



Survey respondents were asked about options for a low-income toll program. As shown in **Table 3-2**, and respondents from households with annual incomes under $50,000, supported providing toll caps and toll credits. Respondents were almost equally split on the free transponder plus $25 credit, with 38% agreeing (**Table 3-2**) and about 39% disagreeing. Respondents experiencing low incomes supported all options comparatively more frequently.

Table 3-2: Key Themes from Survey Respondents – Benefit Type (N = 10,914)

Theme: Benefit Type[1]	All Respondents Strongly Agree or Agree	Households under $50,000/year
Daily or monthly toll caps	45%	55%
Providing a limited number of toll credits for free or discounted toll trips	44%	53%
Transit credits	40%	41%
Free transponder plus $25 credit	38%	48%

[1] Survey question: How much do you agree or disagree with the following options for a low-income toll program? Respondents could also select options indicating disagreement, neither agreeing or disagreeing or unknown.

Respondents experiencing low incomes and respondents that identified as living with a disability supported transit credits relatively less frequently. For these groups, transit credits garnered the least support compared to the other options.

In summary, both the general population and households with incomes under $50,000 most supported providing toll caps and toll credits. Lower-income households were more supportive of all benefit types than the general population. Both groups were more in favor of defining eligibility at the 300% FPL than at the 200% FPL threshold, but lower-income households were more supportive of either level than the general population.

Key themes from the open-ended survey responses and project emails

General themes discussed in the responses to the open-ended question and in direct emails included observations and experiences related to the need for a low-income toll program, thresholds for income eligibility, and the recommended types of credits, discounts, and exemptions, as well as ideas about income verification and self-certification. Key themes included the following:

- Many respondents indicated concern about the impact the toll would have on people experiencing low incomes, particularly in the BIPOC communities, given income inequality, limited travel options, and the increased cost of living.
- Commenters generally supported discounts, exemptions, and credits for people experiencing low incomes, including tiered and phased credits, monthly and daily caps, and an expansion of the low-income threshold. A small number of commenters also suggested exemptions for key user groups such as students, seniors, and people experiencing a disability. A few said there should be no exemptions, and that all travelers, including people experiencing low incomes, should pay at least some amount.
- Some commenters indicated their preferred thresholds or definitions for "low income." A few mentioned that they felt the threshold for low-income eligibility should be raised. General income thresholds for exemptions, discounts, or credits discussed by commenters ranged from $27,000 to $80,000 per year.
- A few commenters indicated concern about the procedural burden that income verification or certification would place on people experiencing low incomes.

ODOT received two emails about discount options for people experiencing low incomes. These comments noted the following:

- Concern about the cost of administering a low-income program and the impact on taxpayers. It noted tolling programs in other states, such as Florida and New Jersey, where everyone pays the same without discounts.
- Concern that the federal poverty guidelines would be too low for senior citizens to qualify. Given this concern, the commenter recommended increasing the eligibility to $45,000 for a married couple.

Respondents indicated concern about the impact the toll would have on people experiencing low incomes, particularly in the BIPOC communities, given income inequality, limited travel options, and the increased cost of living.

3.3 Partner Agency Engagement Period

ODOT posted the draft Low-Income Toll Report to the ODOT Tolling webpage and provided information about how to comment on June 27, 2022. During the week of June 27, ODOT sent emails to partner agencies, toll work groups, the Equity and Mobility Advisory Committee, and other stakeholders sharing the opportunity to review the draft report and provide feedback by July 18, 2022.

Key themes from partner engagement include the following:

- Support for a tiered program that reduces the impact on people just above the income threshold and acknowledges the lack of flexibility in travel time that some workers experience
- Questions about whether the higher income threshold (up to 400% FPL) or a low-income toll program overall would undermine congestion management goals
- Support for multiple payment options and preventing late fees from stacking up
- Concern about how people experiencing low incomes who live outside of the region would be affected
- Support for including Free and Reduced Lunch as a qualifying program for participation in the 200% FPL tier.





Chapter 4: Sensitivity Test for Discount Options

This chapter presents the technical analyses of the potential impacts of income-based discount options on traffic volume and gross toll revenue for the I-205 Toll Project and the Regional Mobility Pricing Project. It also highlights modeling assumptions and methodologies used for this analysis, which is meant to inform—not precisely represent—the potential outcomes of one of the options for consideration.

4.1 Outcomes

This report considered findings from two separate sensitivity test analyses. Sensitivity tests are used to test different project assumptions by changing a single variable and measuring the outcomes of that change. For these analyses, ODOT applied a 50% discount for trips made by drivers experiencing low incomes and measured daily traffic volumes on the tolled facilities (Interstate 5 [I-5] and I-205) and gross toll revenue.

The sensitivity test results do not represent exact outcomes of the options in this report; rather, they suggest the pattern of how a low-income benefits program might affect project outcomes. The tests were performed using the Metro Regional Travel Demand Model[7] to assess future year conditions (in 2040 or 2045[8]). The modeling analyses involve a number of simplified assumptions, such as 100% enrollment in the program by all who are eligible, and high-, medium-, and low-income thresholds that do not perfectly match the federal poverty level (FPL) used in the report options for consideration.

The model results indicate that as more users take advantage of a discount program, the more likely it is that the Toll Program objectives related to revenue and congestion management could be affected. The findings suggest that a limited low-income discount could slightly increase daily traffic volume on tolled facilities and slightly decrease gross toll revenue[9] compared to baseline conditions without a discount. A more inclusive discount program (with increased eligibility at a higher income threshold) could further increase daily traffic volume and decrease gross toll revenue.



[7]Metro's Research Center collects and analyzes transportation-related information to develop and maintain modeling tools for forecasting travel flows and emissions. Travel demand models use data to predict transportation choices such as trip frequency, trip origins and destinations, types or modes of transportation, and travel by time of day.

[8]Earlier analysis for the I-205 Toll Project was performed for model year 2040, but the planning horizon and associated modeling assumptions were extended to 2045 to better fit with the 20-year planning horizon for later analyses, including analysis for the Regional Mobility Pricing Project.

[9]Gross toll revenue is the sum of all money generated from collecting tolls, without taking into account any portion of the revenue that will be used to cover expenses.

4.1.1 Key Findings: I-205 Toll Project Model Sensitivity Test

ODOT performed model sensitivity tests for the I-205 Toll Project to support the refinement of assumptions for the I-205 Toll Project Environmental Assessment. **Table 4-1** shows how daily traffic volume and daily gross toll revenue may change by applying the low-income discount to the baseline project scenario, which includes two toll locations: The Abernethy Bridge and the Tualatin River bridges located east of Stafford Road. The changes represent the difference between application of a low-income discount and the baseline scenario, in year 2040 modeling. The estimated daily traffic volume increase and change in gross toll revenue are totals of the two tolled segments of I-205.

Table 4-1. Comparison of Discount Scenario to Base Toll Rate Scenario in 2040

Change Measurement	Low-Income Discount Toll Scenario (50% of Base Toll for Low Income)
Percent Change in Daily Traffic Volume	+2%
Percent Change in Gross Toll Revenue	-1%

In summary, the 2040 model results indicate that a low-income discount could slightly increase daily traffic volume (2% from the baseline) and could slightly decrease gross toll revenue (1% from the baseline).

4.1.2 Key Findings: Regional Mobility Pricing Project Model Sensitivity Test

ODOT tested two low-income discount scenarios for the Regional Mobility Pricing Project. The first test applied a 50% toll discount to low-income vehicle trips, which make up about 10% to 15% of potential automobile trips on I-5 and I-205. The second test applied a 50% toll discount to the same low-income vehicle trips in addition to half of the medium-income vehicle trips, accounting for a total of 35% to 40% of potential auto trips on I-5 and I-205. **Table 4-2** shows the estimated effects that each discount could have on I-5 and I 205 volumes and the gross Regional Mobility Pricing Project toll revenue, based on modeling for 2045 conditions.

Table 4-2. Comparison of Discount Scenarios Versus Congestion Pricing without Discount Applied in 2045

Change Measurement	Smaller Discount Program (50% Discount for Low-Income Trips)	Larger Discount Program (50% Discount for All Low-Income Trips Plus Half of Medium-Income Trips)
Percent Change in Daily Traffic Volume	increase of 2%	increase of 4%
Percent Change in Gross Toll Revenue[1]	decrease of less than 5%	decrease of 10 – 15%

[1] The gross toll revenue impacts described in this section are based on raw model results and toll rate assumptions. They are intended for relative comparisons and do not represent net toll revenue estimates.

In summary, the smaller (less inclusive) discount program (50% discount on all low-income trips) would increase daily traffic volume by 2% from the baseline, and the larger discount program (50% discount on all low-income trips and half of medium-income trips) would increase daily traffic volume by 4% from the baseline in 2045. The smaller discount program would decrease gross toll revenue by less than 5%, and the larger discount program would decrease gross toll revenue by 10% to 15%.

4.2 Considerations for Sensitivity Tests

As discussed above, the sensitivity tests involved a number of simplified assumptions and model inputs. This section describes key considerations to take note of with regards to the income thresholds model input and value of time/willingness to pay assumption.

4.2.1 Income Threshold

As mentioned previously, the Metro Regional Travel Demand Model used to produce these results uses different income thresholds than the FPL thresholds referenced in the report options for consideration. Trips in this model are divided into three groups based on household income:

Low Income: Household income under approximately $30,000 per year (in current year dollars)

Medium Income: Household income between approximately $30,000 and $125,000 per year (in current year dollars)

High Income: Household income above approximately $125,000 per year (in current year dollars)

As shown in **Table 4-3**, the 2021 FPL thresholds are split into individual household/family size, ranging from 1 person to 14 people, rather than the entire household on average. Because the Regional Travel Demand Model does not account for household/family size associated with each vehicle trip, the outcomes reported in the Key Findings sections in Section 5.1 above cannot be directly tied to the income thresholds used in the model. However, these data provide a helpful point of reference for how income classes in the model relate to FPL.

Table 4-3: Annual Household Income Thresholds for 200% and 400% of the 2021 Federal Poverty Level

Household/Family Size	200% FPL	400% FPL
1	$27,180	$54,360
2	$36,620	$73,240
3	$46,060	$92,120
4	$55,500	$111,000
5	$64,940	$129,880
6	$74,380	$148,760
7	$83,820	$167,640
8	$93,260	$186,520
9	$102,700	$205,400
10	$112,140	$224,280
11	$121,580	$243,160
12	$131,020	$262,040
13	$140,460	$280,920
14	$149,900	$299,800

Source: U.S. Department of Health and Human Services. 2022. HHS Poverty Guidelines for 2022. https://aspe.hhs.gov/topics/poverty-economic-mobility/poverty-guidelines. FPL = federal poverty level

Note: The administration and design of the program is still to be determined. However, 200% FPL was chosen because it is keyed to other federal or state benefits enabling more efficient administration for ODOT. A program tied to 400% FPL may be harder to administer because few, if any, state or federal benefits are tied to income at that level.

4.3 Modeling Assumptions

Each household is assigned to an income class in the Regional Travel Demand Model, and vehicle trips generated by these households are assigned a particular willingness to pay a toll, as represented by a value-of-time (VOT) assumption. This determines how a monetary toll assumption affects travel behavior in the model. For example, a driver with a high VOT is more willing to pay a toll for the travel-time savings that the tolled facility would offer than a driver with a low VOT, even though the amount of money paid is the same for both drivers.

The current model assumptions directly tie income and VOT: low-income drivers are predominately assigned a low VOT. In reality, VOTs are more dynamic than is captured within the aggregate values included in the model framework. Willingness to pay tolls can by highly situational, and thus a range of values could be applicable to trips with identical model characteristics.



Chapter 5: Regional Analysis

This chapter considers income levels in the Portland and southwest Washington regions in relation to the federal poverty level (FPL) and alternative ways, beyond the FPL, to determine eligibility in the region. It describes a decision-making framework and a set of metrics to evaluate different benefit options. The decision-making framework was central to informing development of the options for consideration presented in this report.

As noted in Chapter 4, using the FPL as a benchmark introduced many complexities for interpretation of the sensitivity test analyses. These complexities included accounting for differences in household size when modeling and the insufficiency of using the FPL alone as a threshold for low or medium incomes in urban areas. At the same time, using a nationally recognized federal benchmark like the FPL can make a program easier to understand from the perspectives of both program operators and the public and can foster consistency with other similar programs. These complex considerations and trade-offs warrant further examination of:

- How the FPL relates to the people living in communities surrounding Portland, including southwest Washington;
- How the FPL relates to more regionally specific income thresholds (ALICE and SSS[10]); and
- Benefit recommendations resulting from these relationships.

5.1 Income Levels by Geography

In 2022, the average annual income at 200% FPL is $27,142 for a household/family size of one and $55,500 for a household/family size of four. In the Portland-Vancouver-Hillsboro, OR-WA Metropolitan Statistical Area (MSA), about 25% of the population experiences low income at or below 200% FPL and 54% have incomes at or below 400% FPL. These percentages are lower than Oregon overall, and the proportion of people experiencing both levels of low incomes is higher in Oregon than in Washington. **Table 5-1** displays the population totals and income levels by geography. The table includes percentage of the population experiencing incomes below the FPL not only as a point of comparison but to demonstrate that using the FPL alone as a threshold in the Portland metro area is too stringent to serve a practical purpose and to provide a widespread benefit. These statistics provide context for determining eligibility for the low-income program.

Table 5-1. Populations in the Portland Metropolitan Statistical Area, Oregon, and Washington by Share of the Federal Poverty Level

Demographic (U.S. Census Bureau Classifications)	Metropolitan Statistical Area[1]	Oregon	Washington
Total Population	**2,412,378**	**4,052,019**	**7,266,810**
100% FPL	11%	13%	11%
200% FPL	25%	31%	26%
400% FPL	54%	61%	55%

Source: U.S. Census Bureau, American Community Survey, 2015 to 2019. S1701 Poverty Status in the Past 12 Months.
[1] Metropolitan Statistical Area = Portland-Vancouver-Hillsboro, OR-WA Metro Area

[10]ALICE is the acronym for Asset Limited, Income Constrained, Employed, and represents households with incomes above the FPL but that still don't make enough to pay for the basic cost of living. SSS is the acronym for Self-Sufficiency Standard, which is a measure of the cost for a family to make ends meet without assistance.

5.2 Eligibility for the Portland Region

Since the FPL alone has been demonstrated to be too restrictive to use as a benchmark for the program to provide widespread benefits, feedback from the Equity and Mobility Advisory Committee and stakeholders supported using a more inclusive income threshold. While multiples of the FPL shown above (i.e., 200% and 400% FPL) are commonly used for similar programs, the Oregon Department of Transportation (ODOT) assessed two alternative methodology models:

- **ALICE** (Asset Limited, Income Constrained, Employed) uses a standardized set of measurements to quantify the cost of a basic household budget in each county of partner states. The ALICE Threshold represents the minimum income level necessary for survival for a household and is derived from the ALICE Household Survival Budget—the bare minimum cost of household basics including housing, childcare, food, transportation, technology, and health care, plus taxes and a contingency amount equal to 10% of the household budget. The ALICE Household Survival Budget (for Oregon in 2018) for one adult, one preschooler, and one child is $56,523.[11] ALICE also calculates a Household Stability Budget, which estimates the higher costs of maintaining a viable household over time, including a 10% savings category that can be used in an emergency, for additional education, or to buy a home.[12] For 2018, the most recent data year, the ALICE is $51,216 for a household/family size of one and $118,896 for a household/family size of four.
- **Oregon SSS** (Self-Sufficiency Standard for Oregon) calculates how much income a family must earn to meet basic needs and is derived from the costs of housing, childcare, food, healthcare, and transportation, plus the cost of taxes and impacts of 2021 tax credits. The Oregon SSS minimum cost of living tends to be higher than the ALICE minimum cost of living. For the counties of the Portland Metropolitan Statistical Area, the Oregon SSS for one adult, one preschooler, and one school-age child is around $60,000 to $80,000. **Table 5-2** shows the SSS by county.

[11] United for Alice. https://www.unitedforalice.org/household-budgets/oregon.

[12] United for Alice. https://www.unitedforalice.org/household-budgets-mobile/oregon

Table 5-2: Portland Metro SSS Compared to the Federal Poverty Guidelines

County	Annual SSS	As a Percentage of Federal Poverty Guidelines
Clackamas County	$78,355.02	357%
Columbia County	$67,966.03	309%
Multnomah County	$79,710.87	363%
Washington County	$78,106.52	356%
Yamhill County	$68,352.56	311%
Clark County	$64,600.25	294%
Skamania County	$59,272.81	270%

Source: University of Washington.2021. The Self-Sufficiency Standard for Oregon 2021. https://www.oregon.gov/workforceboard/data-and-reports/Documents/The-Self-Sufficiency-Standard-For-Oregon-2021.pdf.
SSS = Self-Sufficiency Standard

Both the ALICE and SSS methodologies calculate standards for unique combinations of county and family composition. **Table 5-3** gives examples of the varying SSS by county and household size as a percentage of the FPL, demonstrating that meeting this standard can range from earning 221% of the FPL for a household of one in Skamania County, Washington, to earning 497% of the FPL for a household of five in Multnomah County, Oregon. Various household compositions and sizes of 6 to 20 are also calculated in the SSS but not shown below. The SSS per household size indicated below are averages taken from all household compositions per household size.



Table 5-3. Portland Metro SSS Compared to Federal Poverty Guidelines by Household Size

Family Size	1	2	3	4	5
Clackamas County	$ 36,249.70	$57,349.17	$71,700.00	$95,112.94	$144,944.23
%FPL	281%	329%	327%	359%	467%
Columbia County	$32,543.45	$51,364.19	$63,135.63	$82,911.86	$122,969.33
%FPL	253%	295%	288%	313%	396%
Multnomah County	$31,801.10	$54,173.98	$70,300.35	$95,727.33	$154,422.78
%FPL	247%	311%	320%	361%	497%
Washington County	$36,155.86	$57,191.33	$71,403.40	$94,806.47	$144,473.67
%FPL	281%	328%	325%	358%	465%
Yamhill County	$33,210.14	$51,912.40	$63,531.74	$83,371.06	$123,464.96
%FPL	258%	298%	289%	315%	398%
Clark County	$30,756.90	$48,584.59	$60,219.16	$79,647.82	$120,376.66
%FPL	239%	279%	274%	301%	388%
Skamania County	$28,484.07	$44,680.15	$54,932.57	$71,964.98	$106,813.92
%FPL	221%	256%	250%	272%	344%
Overall	**$32,743.03**	**$52,179.40**	**$65,031.83**	**$86,220.35**	**$131,066.51**
%FPL	**254%**	**300%**	**296%**	**325%**	**422%**

Source: University of Washington 2021. The Self-Sufficiency Standard for Oregon 2021. https://www.oregon.gov/workforceboard/data-and-reports/Documents/The-Self-Sufficiency-Standard-For-Oregon-2021.pdf.
FPL = federal poverty level; SSS = Self-Sufficiency Standard

While the fact that these standards are highly specific to family composition and geography makes them more accurate in terms of estimating the level of income that's required for families to meet their critical needs, it also makes it difficult to practically apply to the process of determining household eligibility. This is because requesting home location and family members' ages significantly increases the complication of the information needed to determine eligibility. ALICE and SSS can still be used to judge the effectiveness of using FPL multiples as benchmarks in reaching the right level of intended users.

See **Table A-3** in Appendix A for more information on ALICE and the Oregon SSS.

Chapter 6: Case Study Findings

This chapter reviews best practices and lessons learned from other income-based toll programs and fare systems. The case study analysis and stakeholder interviews revealed many barriers to enrollment in low-income benefit programs, but providers still face difficulties in lowering those barriers. The review of national programs and feedback from the Equity and Mobility Advisory Committee feedback suggest that the other programs' benefits, such as free transponders or a $25 annual credit, are not appealing enough to increase enrollment significantly.

6.1 National Case Studies



The process to develop this report included a national scan of existing or proposed low-income programs that could offer best practices or lessons learned. This research identified only two low-income toll programs operating in the United States. While the lessons learned from the two programs are valuable, the research effort was also broadened to assess low-income programs in Oregon in general and relevant transit fare low-income programs, as well as proposed low-income toll programs. The research also included a focus on enrollment options for low-income programs.

6.1.1 Existing Low-Income Toll Programs

The two existing low-income toll programs are in Los Angeles and in the Norfolk, Virginia, metro area.

For eligible participants, the **LA Metro Low-Income Assistance Program** waives a $1 monthly account maintenance fee and provides a $25 credit to offset the cost of purchasing the transponder.[13] Households that report an annual household income of less than 200% of the federal poverty level (FPL) are eligible. The program's value was initially set to match the cost of the transponder, and, as such, another way to describe the program is that it provides a free transponder to participants. Because of the relatively low value of the benefit, LA Metro does not require users who have qualified for the program to re-qualify on a recurring basis. In 2020, LA Metro considered increasing the value of the toll credit provided to participants, since there is an understanding that despite significant marketing efforts, the limited enrollment in the program is likely due to the low value of the benefits provided to users—3% of all transponders used on the toll corridors are enrolled in the program. Furthermore, LA Metro also provides toll credits for users of transit on the corridor (and bus passes for roadway users) and uses net revenues from the corridor to fund multimodal mobility projects in adjacent communities. The key lessons learned are:

- Transponder purchase costs can be a barrier for corridor users experiencing low incomes.
- If the program verifies income, it may not be necessary to re-verify annually.
- Program enrollment will be low if the value of the benefit is low.
- It is possible to use toll revenues for equity programs beyond providing credits and percentage discounts.

[13] https://www.metroexpresslanes.net/offers-discounts/low-income-assistance/

The **Virginia Department of Transportation (VDOT) Toll Relief Program** provides eligible participants with discounts on various toll tunnels in the Norfolk, Virginia, metro area. In order to join the program, users must apply at an E-ZPass customer service center, of which there is one in each city, both of which are on bus lines and are accessible to people with disabilities. This program provides low-income residents of two towns directly adjacent to the toll tunnels a 50% discount on their first ten trips per week. Until recently, this program was designed differently so that benefits would accrue primarily to drivers using the tunnels frequently—approximately 2,000 to 3,000 users are enrolled in the program, with the average benefit being approximately $25 per month. A prominent aspect of this program is that it is led by a steering committee of local stakeholders, including representatives from the NAACP, the Hispanic Chamber of Commerce, local military bases, local business owners, and local elected officials. With a diverse slate of members, a steering committee involving local stakeholders can help focus communities continue to have a voice with regard to program features and functions on a recurring basis once it is implemented. As a further equity accommodation, VDOT dropped the required minimum balance on the E-ZPass transponder from $35 to $20. VDOT has found that enrollment, verification, and maintenance costs add up to approximately 15% of the value of the benefit distributed—the state pays for these aspects of the program, and the private concessionaire absorbs the cost of the reduced tolls.

The key lessons learned are:

- It is likely that significantly less than all eligible corridor users will enroll in a low-income program.
- A steering committee or equity panel can help people experiencing low incomes continue to shape the program after implementation.
- Requiring a minimum account balance and placing a minimum threshold on automatic reloading can be significant barriers for people experiencing low incomes.
- The cost of income verification is a significant share of overall program costs for low-income toll programs.
- A thoughtful and broadly accessible enrollment process is key to driving program enrollment and equity.

Additional research on corridor-length and shorter-length (e.g., bridge replacement) tolling programs and projects is included in Appendix A.



6.1.2 Proposed Low-Income Toll Programs

Various states and cities around the United States are actively considering implementing low-income toll programs, including Washington State; the Oakland, California, metro area; the San Francisco metro area; San Bernardino County, California; Colorado; and Minnesota. The studies conducted for these programs reflect the lessons learned from existing programs, and also include:

In Washington state:

- The proposed program provides recurring monthly toll credits or free toll trips to all eligible Washington residents with annual incomes at or below approximately 200% FPL using the corridor, and proposes to provide free transponders, establish a program advisory panel, and be intentional about program accessibility.
- The State has an existing online system for instantly checking whether an individual has qualified for any state benefits, significantly simplifying the income verification process.
- The proposed low-income toll program was chosen to:
  - » acknowledge the value of program simplicity for users and implementing agencies,
  - » be responsive to stakeholder and user feedback that occasional free trips were highly valuable for making emergency trips,
  - » leave open the possibility that transponders may not have required balances, credit, or debit cards for program users, all of which can present significant barriers, and
  - » be flexible in when the benefits can be used, to acknowledge that people experiencing low incomes have diverse mobility needs, and they know their own mobility needs best.
- A program option choice framework considering user benefits, program practicality, and costs guided the choice of program options, with the framework reflecting feedback, knowledge, and preferences from stakeholders, decision makers, and the community.

In the Oakland, CA, metro area, the implementing agency has expressed a desire to learn by observation rather than modeling or a multiyear study and is launching a pilot of a low-income toll discount program on a set of express lanes.

In Colorado, the proposed low-income toll program for new, variable-rate express lanes includes a significant amount of choice for users and the community.[14] The program is available for residents of Globeville and Elyria-Swansea—two neighborhoods in the Denver metro area—with annual household incomes below 200% FPL. Program participants can choose from a $100 toll and/or transit credit. The program is planned to be set up with an advisory panel, and in future years, the community will choose whether to allocate funding from net toll revenues to further toll credits, transit credits, or a combination. This kind of choice makes programs more complicated for users and implementers but can provide significant value to program users and communities who understand their own needs best.

[14] https://www.codot.gov/programs/expresslanes/gestollingequity

In the San Francisco, CA, metro area, the San Francisco County Transportation Authority (SFCTA) is planning to implement tolls to access 8,000 new residential units and commercial developments on Treasure Island.[15] Tolls are expected to go into effect in 2025 and will be variably priced by time of day. Tolls on Treasure Island will be in addition to existing tolls on the San Francisco-Oakland Bay bridge that provides access to the Island. As part of the evaluation of toll rates, various discounts and exemptions are being assessed. The San Francisco Board of Supervisors decided existing Treasure Island residents will not be required to pay a toll. Nonresidents and new residents will be tolled when entering and exiting the island. SFCTA is proposing a tiered benefit, with a toll waiver for very low-income households (<55% area median income [AMI]), and a 50% discount for low- and moderate-income households (50% to 80% AMI and 80% to 120% AMI, respectively). The agency had also evaluated program options with even more tiers of eligibility and benefits. Notably, the agency feels that 200% FPL as a threshold for low-income determination is too low in the San Francisco area.

- In addition to toll discounts and exemptions, Treasure Island residents living in below-market rate housing will qualify for a transit pass at a 50% discount. Tolls and parking fees will help manage congestion and pay for expanded transit and ferry service, island shuttle service, and bike/pedestrian improvements.
- Consideration is also being made for low-income and non-profit workers employed on the island to receive a monthly subsidy through their employers to offset the cost of travel to access their jobs.
- This program and various considerations on toll impacts on communities illustrates how the use of a combination of geographic eligibility and locally relevant income thresholds can create an equitable program that still delivers significant infrastructure and transit improvements.

[15] https://www.sfcta.org/projects/treasure-island-transportation-program#panel-key-features

6.1.3 Existing Low-Income Transit Fare Programs

Transit agencies around the country offer discounts to people experiencing low incomes. This section discusses the three programs with relevant lessons learned and practices. The funding and operations models for highways and transit agencies are significantly different, and as such the levels of benefit provided may not be analogous to toll road contexts.

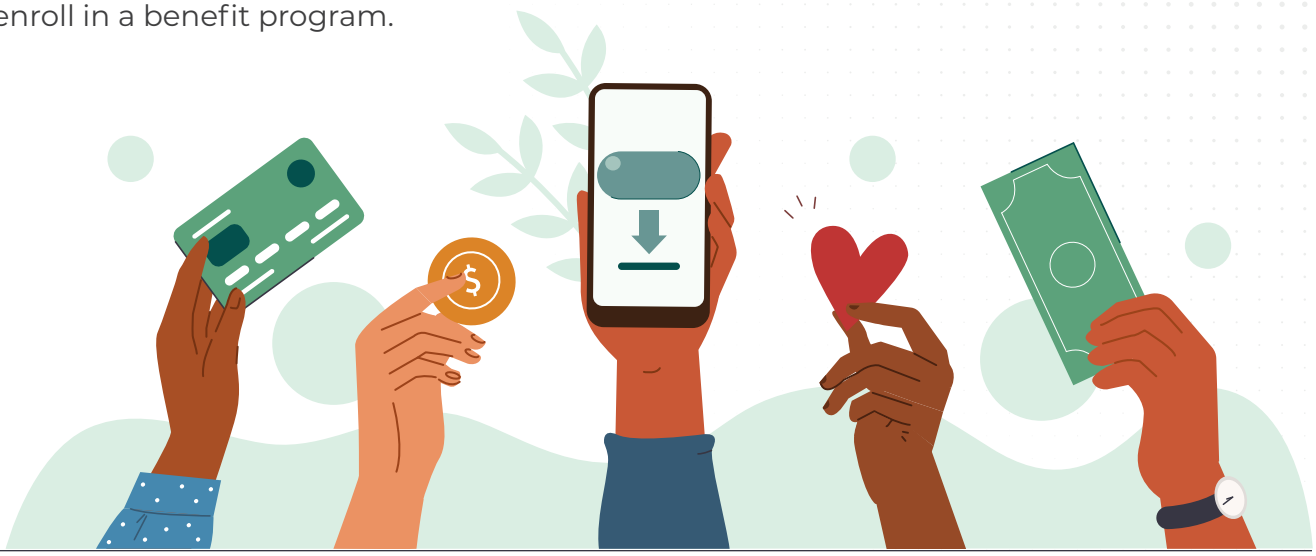
TriMet, the primary public transportation operator in the Portland metro area, offers a low-income assistance program that provides qualifying riders with reduced fares. The agency's electronic fare program, Hop Fastpass, can also be used on the Portland Streetcar and buses operated by C-TRAN, the Clark County, Washington, public transportation agency. Program eligibility comprises four principles: applicants must be Oregon residents, have incomes at or below 200% FPL, be between the ages of 16 and 64 (with older and younger individuals eligible for different discount programs), and verify their identity. The program provides between a 50% and a 75% discount on various transit passes. Best practices and key lessons learned from this program include:

- Program funding is through payroll taxes and as such is reliable and sustainable.
- The program requires users to provide proof of income, and TriMet feels this causes them to turn away potential users who are probably eligible but don't have the appropriate paperwork.
- The agency encourages high levels of enrollment in its low-income benefit program (with approximately 10% of eligible individuals in the Portland metro area enrolling) through:
    - » Designing the program to have a single point of centralized administration within the government, while also having many different points of contact for participants, since TriMet is partnered with cities and community organizations to help people access the benefit.
    - » Providing multiple enrollment options, with an online application as well as seven in-person locations, reducing barriers to enrollment.

In the Seattle, WA, metro area, **King County Metro** provides two low-income fare programs, one providing discounted rides to people with incomes below 200% FPL and the other providing free rides to people who have incomes below 80% FPL and are enrolled in one of six state benefit programs.[16] They key lessons are:

- Recognizing that people have a wide range of ability to pay for transportation costs and therefore creating a tiered program to provides more benefits to people experiencing very low incomes as opposed to people experiencing moderately low incomes.
- Using enrollment in other government programs as a substitute for direct verification of income for program enrollment.

LA Metro's Low-Income Fare is Easy (LIFE) program provides a free 90-day transit pass, followed by a choice of fare credit or fare discount. A key practice from the program is its use of self-certification, in which program users are allowed to state that their income is below the program's eligibility thresholds without having to provide further documentation. This process makes the enrollment process easier for program participants and cheaper for the implementing agency. Furthermore, the agency encourages enrollment by promoting the program and allowing in-person registration at pop-up locations and community fairs—in general, meeting potential participants where they already are can greatly increase the share of people who enroll in a benefit program.



[16]The six Washington state benefit programs: Temporary Assistance for Needy Families (TANF)/State Family Assistance (SFA), Refugee Cash Assistance (RCA), Aged, Blind, or Disabled Cash Assistance (ABD), Pregnant Women Assistance (PWA), Supplemental Security Income (SSI), Housing and Essential Needs (HEN).

6.2 Lessons Learned for Eligibility and Enrollment

This case study analysis provides insight into best practices for, and lessons learned from, existing and planned programs. This section expands upon the previous discussion to focus on eligibility and enrollment. An overall theme is that driving enrollment in low-income toll programs, and in benefit programs in general, is a significant challenge. Barriers can include knowledge and understanding of the programs, the low value of benefits provided, balance and banking requirements for transponders, the cost and complication of in-person and paperwork-intensive enrollment processes, and a lack of thorough accessibility in the enrollment process. For example, the review of national programs and feedback from the Equity and Mobility Advisory Committee suggests that the benefits offered by some other programs, such as free transponders or a $25 annual credit, are insufficiently appealing to someone going through the enrollment process.

The following subsections summarize best practices and lessons learned from the national case studies in two categories: eligibility thresholds and self-certification.

6.2.1 Eligibility Thresholds

Income thresholds for benefit programs can consist of a single threshold, for example everyone whose income is below the FPL qualifies, which are called one-tier programs. Alternately, they can consist of multiple thresholds, for example people with incomes below the FPL receive a large benefit and people with incomes below 300% FPL receive a smaller benefit, which are called multi-tier programs. Multi-tier programs are more challenging to implement and harder for users to understand, but they are often more equitable and economically efficient in distributing benefits to those who most need it, while still providing benefits to people experiencing moderately low incomes. Both one-tier and multi-tier eligibility thresholds are used for benefit programs around the country.

Many of the toll and fare equity programs analyzed use a multiple of the FPL as a reference to determine eligibility for benefits. FPL is widely known, but it no longer reflects the current cost of basic household necessities or differences in cost of living across geographies in the United States. Depending on the median income in an area, people experiencing low incomes or very low incomes compared to other members of their local community may still have incomes that fall above the FPL. Agencies in Portland, and the other geographies listed above, use a multiple (e.g., 200%) of the FPL as a threshold to right-size the program eligibility threshold with the local cost of living. **Table 6-1** outlines income requirements used by the low-income programs listed in the case studies.

Table 6-1. Income Requirements for Various Low-Income Programs

Program	Income Cap Requirements
LA Metro toll program [1]	200% FPL
VDOT toll program [2]	Approximately 200% FPL
Washington proposed toll program [3]	Approximately 200% FPL
San Francisco proposed toll program [4]	Various tiers, up to median area income
TriMet fare program [5]	200% FPL
King County Metro fare programs [6]	200% FPL for lower tier; 80% FPL plus enrollment in one of six state benefit programs for higher tier
LA Metro fare program [7]	HUD very low income level for Los Angeles

[1] https://www.metroexpresslanes.net/offers-discounts/low-income-assistance/

[2] https://www.virginiadot.org/newsroom/statewide/2021/enrollment-now-open-for-2022-vdot-toll-relief-program12-1-2021.asp#:~:text=Beginning%20December%201%2C%202021%2C%20Norfolk,to%2010%20trips%20per%20week.

[3] https://wstc.wa.gov/wp-content/uploads/2021/08/2021-WSTC-Tolling-Equity-Report.pdf

[4] https://www.sfcta.org/sites/default/files/2022-01/TIMM_PIR_2021_2022-01-21.pdf

[5] https://trimet.org/lowincome/

[6] https://kingcounty.gov/depts/transportation/metro/fares-orca/subsidized-annual-pass.aspx; https://kingcounty.gov/depts/transportation/metro/fares-orca/orca-cards/lift.aspx

[7] https://kingcounty.gov/depts/transportation/metro/fares-orca/orca-cards/lift.aspx

FPL = federal poverty level; HUD = U.S. Department of Housing and Urban Development; VDOT = Virginia Department of Transportation

As discussed elsewhere in this report, two methodologies called ALICE (Asset Limited, Income Constrained, Employed) and Oregon SSS (Self-Sufficiency Standard) attempt to calculate an updated version of the FPL, assessing the income one needs to fulfill all basic necessities based on family size and home geography. The resulting figures are significantly higher than the FPL, and for the Portland metro area are in the vicinity of 400% of the FPL.

6.2.2 Self-Certification

To qualify for enrollment in low-income benefit programs, applicants are required to state or demonstrate that their household income meets the eligibility requirements. Applications may require documentation to prove income, such as a paystub, benefit letter, or other approved document. However, self-certification allows applicants to certify their income without substantiating documents. Applicants may be asked to check a box on the application that says, "I verify that the income I selected is true." Some programs may also require applicants to agree to provide proof of income in the future.[17] Self-certification reduces barriers to enrollment in low-income benefit programs. Benefit programs in general, and particularly programs with self-certification, commonly generate discussion and concerns about the possibilities of fraud. In practice, much of this discussion is grounded in prejudice and stereotype, and benefit programs like the low-income toll program being considered here do not generate a meaningful amount of fraud. When balanced against the significantly lower costs of program operation, increased enrollment, and time and cost saved to program users, the benefits are likely to outweigh the costs.

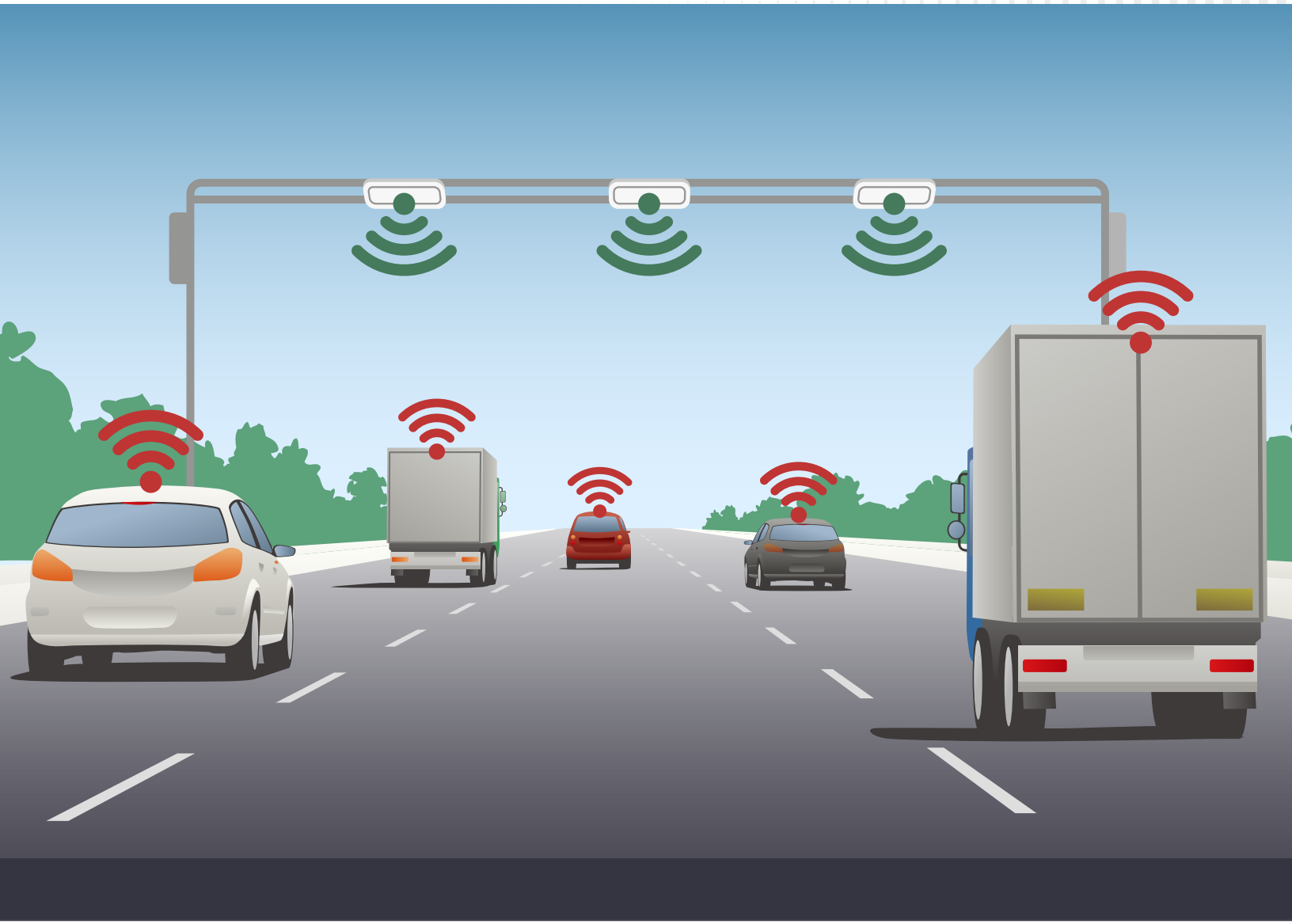
In particular, the low-income toll program would have features that further limit the potential for and cost of fraud:

- **Benefits cannot be cashed out**: The fact that the benefits can only be used for travel on the toll corridors, and cannot be cashed out, significantly limits the potential for professionalized fraud at scale, by far the most visible kind of fraud observed in benefit programs.
- **Use of the benefit is limited**: The low-income toll benefit only applies to people who use the tolled portions of I 5 and I-205, which significantly limits the potential for fraud, because users have to live in the project area (and not qualify for the program themselves).
- **Benefits are administered on a small scale**: Each person only receives one instance of the benefit at a time. Furthermore, if the final benefit chosen is bounded—that is, it is a credit or a number of free trips, that makes fraud even less appealing, because it is much less likely that many people will commit fraud for a benefit that is limited to a fairly small value.

[17] Self-certification example: https://www.hudexchange.info/resource/4786/cdbg-selfcertification-of-annual-income-form

More research may be needed to understand whether a full exemption would invite more illegitimate use of the program by extremely frequent (for example commercial) users of the corridor, who can thus achieve significant savings by misusing the program. A preferred way of addressing this issue would be to perform focused income checks for self-certified accounts that become power users of the program.

Self-certification of income can be beneficial to increase accessibility to the low-income toll program and therefore increase overall enrollment. Although there may be concerns about fraud, some of which arise more from stereotype and bias, administering a program without self-certification may be more costly than potential losses from fraud.



Chapter 7: Evaluation Framework for Type of Benefit

This chapter provides a high-level evaluation framework ODOT developed using other agencies' experiences and input from various stakeholders to evaluate different options for the low-income benefit.

To help guide the options for consideration in this report, ODOT used other agencies' experiences and the input from various stakeholders to develop a high-level evaluation framework and a set of metrics to evaluate different benefit options. Further detail on the metrics and the evaluation framework is provided in the Regional Mobility Pricing Project Spring 2022 Engagement Report. The evaluation framework considers the type(s) of benefits to provide, the method of enrollment, and the selection of income criteria.

The set of metrics include:

- Benefit to program participants
- Cost of program implementation
- Impact on roadway operations
- Feasibility of implementation

Key concepts used in the evaluation framework include the following:

Income threshold: Household income within a defined range of eligibility for program participation (e.g., households within 0% to 100% of the federal poverty level).

Toll discount: A discount applied to the assessed toll for each trip (e.g., 50% discount on a $3 toll would result in the driver paying $1.50). A toll discount is applied as the trip is charged, so the driver would pay the discounted price. Percentage discounts are the easiest benefit for participants to understand and track but require reloading a toll account and may incentivize travel during peak hours.

Toll credit: A credit applied to a transponder account on a recurring basis (e.g., a $25 toll credit applied to the transponder account every 6 months). Credits diminish the burdens of payment card requirements, minimum account balances, and automatic reloading events. Since minimum account balances and payment card requirements are significant enrollment barriers, it is expected that a toll credit or free trip benefit would lead to greater enrollment than a percentage discount. Credits also incentivize travel during non-peak hours.

Free trip(s): A set number of free trips are applied to a transponder account on a recurring basis (e.g., 10 free trips in the tolled area per month). Free trip(s) diminish the burdens of payment card requirements, minimum account balances, and automatic reloading events but may incentivize travel during peak hours. Since minimum account balances and payment card requirements are significant enrollment barriers, it is expected that a toll credit or free trip benefit would lead to greater enrollment than a percentage discount.

Exemption: Those enrolled in the low-income toll program are exempt from paying any toll costs. This discount option places the least burden on travelers experiencing low incomes but may incentivize travel during peak hours.

Income verification: The process to determine that an applicant is within the eligible income range. This can be done through providing proof of income (such as a W2), through enrollment in another approved low-income benefit program (such as the Supplemental Nutrition Assistance Program [SNAP]), or through self-certification (applicant certifies their income without proof of income). Income verification can be a barrier to enrollment, but that can be improved by accepting enrollment in another low-income benefit program or allowing self-certification.

Based on the decision-making framework and the set of metrics, a score was assigned to each benefit option. The score was shaped by the relative weighting of each metric. Both the weighting for each metric and the score for each option on each metric can be revised based on feedback from stakeholders. This iterative revision process is part of the decision-making framework.

The following high-level ideas are the basis of the decision-making framework, the weighting for each metric, and the initial scores:

- People experiencing low incomes have a diverse set of travel needs, and their commute trips tend to be more broadly distributed at all hours of the day, as opposed to being confined to peak hours.
- A multi-tier eligibility threshold makes tolling less regressive than a single tier, but it is harder for program users to understand and costlier to implement. Stakeholders have emphasized the benefits of both options: simplicity is critical, but so is acknowledging the different travel and budget needs of people experiencing very low incomes as opposed to people experiencing moderately low incomes.
- Several toll discount options, including credits, free trips, percentage discount, tax credit, or full exemption, are presented for evaluation. Considerations regarding these discount options include the following:
  - » Credit or free-trip option (as opposed to a percentage discount) diminishes the burdens of credit card or debit card requirements, minimum account balances, and automatic reloading events. Since minimum account balances and payment card requirements are significant enrollment barriers, it is expected that a toll credit or free trip benefit would lead to greater enrollment than a percentage discount.
  - » Given the early stage in developing the Oregon Toll Program, all discount options appear equally feasible from a tolling back-office perspective.
  - » Percentage discounts and free trips incentivize travel during peak hours and add trips to the toll network when it is most stressed due to peak-hour demand. In contrast, toll credits and fixed discounts incentivize traveling off-peak, but they also have less impact on making the time-saving distribution more equitable.
  - » Percentage discounts are easiest to understand and track for program participants, but they have disadvantages, such as necessitating the funding of toll accounts, whether with cash or a credit/debit card, both of which can present challenges for people experiencing low incomes.
  - » Stakeholders broadly support percentage discounts, credits, and a fixed number of free trips.
  - » Self-certification is a much simpler model of income verification for the implementing agency and for the applicant than a verification option that requires paperwork.

The decision-making framework based on the high-level ideas above led to the scoring system shown in **Figure 7-1**. Higher numerical scores (up to 6.2) are better, and lower scores (down to 3.4) are considered worse. In general, the scores indicate the following:

- A recurring credit or a recurring number of free trips provides the greatest combined value for users and the operating agency, followed by a percentage discount.

- Self-certification is more efficient overall than actively verifying income on enrollment.
- One-tier and multi-tier options both work well, with a slight edge to multi-tier program versions.

Figure 7-1. Initial Scores for Each Discount Option

Discount Option	Enrollment	Tier	Score*	Primary Rationale
Percent Discount	Self-Certification	One-tier	5.0	These options are both more cost effective and feasible
		Multi-tier	5.3	
	Confirmed Eligibility	One-tier	3.6	These options have a lower user benefit
		Multi-tier	3.7	
Number of Free Trips	Self-Certification	One-tier	6.1	These options have a higher user benefit
		Multi-tier	6.2	
	Confirmed Eligibility	One-tier	4.1	These options have a lower user benefit and are more expensive
		Multi-tier	4.1	
Monthly Credit	Self-Certification	One-tier	5.7	These options are more cost effective and have a higher operational impact
		Multi-tier	5.8	
	Confirmed Eligibility	One-tier	4.0	These options present more feasibility challenges
		Multi-tier	4.0	
Fixed Discount	Self-Certification	One-tier	4.7	While these options are more cost effective, they provide less user benefit
		Multi-tier	5.0	
	Confirmed Eligibility	One-tier	3.4	These options present less user benefit and have more feasibility challenges
		Multi-tier	3.5	

**Higher numerical scores (up to 6.2) are better, and lower scores (down to 3.4) are considered worse.*

SCORE FACTOR

User Benefit | Program Cost | Operational Impact | Other Feasibility

The Toll Program and Affordability Research, the Regional Mobility Pricing Project Spring 2022 Engagement Report, and the appendices of this report provide a review of low-income toll programs and additional information on the evaluative framework.

Chapter 8: Options for Consideration

This chapter details this report's three options for establishing and operating a low-income toll program: (1) provide a significant toll discount, (2) provide a smaller, more focused toll discount, and (3) use a verification process that leverages existing programs. The analysis of each of these options for consideration is organized into a four-part discussion:

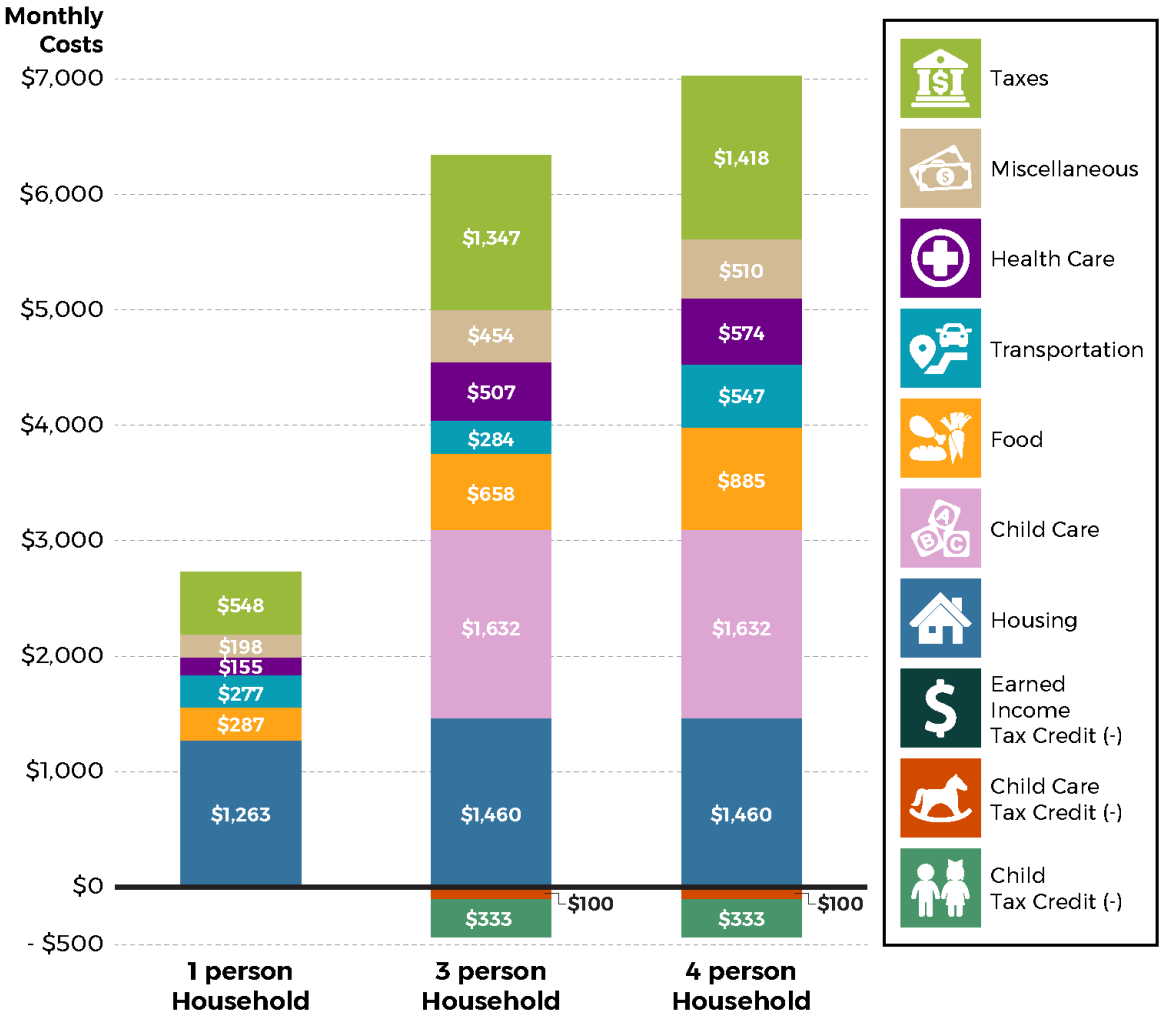
1. **Overview** of the evidence that supports further consideration of the option
2. **Key findings** regarding the engagement, analysis, and research presented in the report
3. **Considerations** of benefits, costs, and trade-offs for the Oregon Department of Transportation (ODOT) to examine and to inform decision-making
4. **Next steps** for further exploration and potential implementation of the option

8.1 Provide a significant toll discount (e.g., credits, free trips, percentage discount, or full exemption) for households with incomes equal to or below 200% Federal Poverty Level.

8.1.1 Overview

People experiencing low incomes have to make difficult daily choices to meet their basic needs (e.g. paying for food, shelter, clothing, and healthcare). A sizeable discount would help alleviate the burden of choosing between paying a toll and meeting those basic needs. This option is strongly supported by the Equity and Mobility Advisory Committee (EMAC) and by community members who participated in the focused public engagement process.

Figure 8-1. Monthly Costs Budget Comparison Graph



	1 person Household	3 person Household	4 person Household
Monthly Total	$2,729	$5,909	$6,593
Annual Total	$32,748	$70,908	$79,116

Source: University of Washington. 2020 and 2021. The Self-Sufficiency Standard for Oregon (https://selfsufficiencystandard.org/oregon/) and The Self-Sufficiency Standard for Washington (https://selfsufficiencystandard.org/washington/).

Notes:
- Washington data (Clark and Skamania counties) is from 2020
- Oregon data (Clackmas, Columbia, Multnomah, Washington, and Yamhill counties) is from 2021
- 1 person household = 1 adult
- 3 person household = 1 adult, 1 preschooler, 1 school age child
- 4 person household = 2 adults, 1 preschooler, 1 school age child

8.1.2 Key Findings

EMAC supported a sizable benefit at 200% of the federal poverty level (FPL) but was divided on whether it should be a completely free option (100% discount) or one that is deeply subsidized (90%).

Findings from sensitivity testing[18] for the I-205 Toll Project indicate that a 50% discount for people experiencing low incomes would increase daily traffic volume by 2% and decrease gross toll revenue by 1% compared to the Project's baseline scenario (based on the modeling analysis in 2040 conditions).

Findings from sensitivity testing for the Regional Mobility Pricing Project indicate that a smaller discount program (50% discount for all low-income trips) would increase daily traffic volume by 2% and decrease toll revenue by less than 5% compared to the baseline. A larger discount program (50% discount on all low-income trips and half of medium-income trips) would increase daily traffic volume by 4% and decrease gross toll revenue by 10% to 15% compared to the baseline.

Among the discount options, providing a monthly credit or a specific number of free trips scored the highest in the evaluation framework. A percentage discount and fixed discount scored the lowest.

The FPL is split into household/family size, ranging from 1 to 14 people. Since the FPL does not account for many household expenses and does not account for the higher cost of living in some geographic areas, low-income programs in urban areas often instead use a multiple of the FPL, such as 200% FPL instead of 100% FPL, to determine qualifications.

In 2022, the average annual income at 200% FPL is $27,142 for a household/family size of one and $55,500 for a household/family size of four.[19]

- In the Portland metro area, about 25% of the population has incomes at or below 200% of the FPL. This is lower than Oregon overall.
- The FPL is updated every year by the U.S. Census Bureau. Eligibility for the low-income toll program would therefore be updated annually. Additional work by ODOT is needed to determine eligibility updates for users who automatically enroll through other benefits programs.

Case study research shows that the 200% FPL threshold is commonly used to determine eligibility for existing low-income benefits programs in Oregon and nationally. The precedent set by these programs' use of the 200% FPL threshold shows it is an easily understood guideline as to who should qualify for low-income benefits programs. Using the same income threshold as existing low-income programs, such as the TriMet Hop Fastpass or the Free and Reduced Lunch program, may also allow ODOT to partner with other programs for verification and enrollment in the low-income toll program and could increase enrollment and reduce costs and security risk for ODOT.

[18]Sensitivity tests were performed using the Metro Regional Travel Demand Model to assess future year conditions (in 2040 or 2045). The modeling analyses involve several assumptions, such as 100% enrollment in the program by all who are eligible, and the income thresholds used in the model do not perfectly match the FPL used in the report options for consideration. The income thresholds used in the modeling analysis for vehicle trips are divided into three groups: low income (household income under approximately $30,000 per year in current year dollars), medium income (household income between $30,000 and $125,000 per year), and high income (household income above $125,000 per year in current year dollars).

[19]Assistant Secretary for Planning and Evaluation. 2022 Poverty Guidelines: 48 Contiguous States (all states except Alaska and Hawaii). https://aspe.hhs.gov/sites/default/files/documents/4b515876c4674466423975826ac57583/Guidelines-2022.pdf. Accessed on June 8, 2022.

8.1.3 Considerations

Among the discount options, providing a monthly credit and a specific number of free trips scored the highest in the evaluation framework. A percentage discount and fixed discount scored the lowest. The evaluation framework considered the benefits for users, costs, operational impacts, and feasibility for each identified discount option. Credits and free trips scored higher than a percent discount because these options provide a possibility that program participant accounts would not require a balance or a debit or credit card on file. These requirements can serve as major barriers to program enrollment. In addition, credits and free trips allow users to make occasional emergency or high-priority trips for free on the tolled roadway. This is of high value for those users, as even discounted trips can serve as a barrier for people experiencing low incomes.

Additional consideration is needed to understand customer service implications for each discount type. As ODOT learned during the partner engagement period, full exemptions and credits are easier to explain to potential applicants, while trip-based discounts may pose more challenges to communicate. However, there are reasons to prefer credits or free trips to full exemptions, since these approaches can cover most or all trips for most eligible corridor users, while preventing the benefit from accruing disproportionately to a small number of power users of the corridor.

Traffic and revenue might be affected differently based on whether ODOT pursues a percentage discount or credit for drivers experiencing low incomes. The traffic and revenue studies for both toll projects will refine and confirm the impacts of the low-income policy decision, including analysis of the costs to administer the low-income program and assumptions on expected participation rates. ODOT will coordinate with local equity and tolling equity specialists to conduct this work.

The option to provide a benefit through tax credits comes with specific advantages and disadvantages. Substantial further study would be required to understand whether this option would reduce administrative complexity and costs for ODOT. Tying financial relief to tax filing has some equity disadvantages, primarily that the benefit would be delayed until tax returns are filed. Furthermore, tax filings are often time consuming and complicated, and may not be required for people with low incomes, possibility resulting in low and inequitable utilization of the program.

8.1.4 Next Steps

Additional analysis and engagement is needed to assess and confirm the 200% FPL threshold, as well as to assess and identify the discount type (e.g., credits, free trips, percentage discount, tax credit, or full exemption).

8.2 Provide a Smaller, More Focused Toll Discount (i.e., credits, free trips, percentage discount, tax credit or full exemption) for Households with Incomes above 200% and up to 400% of the Federal Poverty Level.

8.2.1 Overview

Research suggests that many households with incomes above 200% FPL still struggle to meet basic needs. Providing a more focused discount would help alleviate the burden of toll expenses. Furthermore, people in this income category may experience income that fluctuates throughout the year or varies year to year. This benefit would offer some reassurance of continued benefits despite that fluctuation.

8.2.2 Key Findings



Stakeholders and project partners expressed support for tiered eligibility that reduces impacts on people just above the income threshold and accommodates the lack of schedule flexibility that some workers experience.

EMAC reviewed existing and proposed low-income toll programs and suggested that the benefits offered, such as free transponders or a $25 annual credit, are insufficiently appealing for someone going through the enrollment process.

Stakeholders and community members support providing a benefit above 200% FPL and up to 400% FPL:

- People who responded to the April/May 2022 regional online survey support providing some benefit to a range of incomes, up to 300% FPL (**see Table 3-1**). Respondents generally chose a higher income threshold for eligibility (300% FPL) instead of a lower income threshold (200% FPL). The survey was developed prior to case study research and regional economic analysis that informed income threshold considerations. While survey respondents were asked about 300% FPL, the upper income limit was revised to 400% FPL to reflect the additional research findings regarding cost of living.
- EMAC reviewed a presentation on preliminary findings, and committee members expressed support for providing a sizeable benefit at 200% FPL and a smaller benefit above 200% and up to 400% FPL. EMAC also agreed that including two income ranges is worth the additional complexity so that different needs can be met.
- In response to the draft Low-Income Toll Report, members of an EMAC subcommittee agreed that 400% FPL is an appropriate maximum income threshold. Subcommittee members also suggested communicating this threshold as yearly or hourly income (as opposed to FPL) to help the public recognize program benefit eligibility.



Results from the evaluation framework analysis indicate that a multi-tier program, compared to a one-tiered program, scores the same or better for all discount options and enrollment processes.



The Oregon SSS (Self-Sufficiency Standard) and ALICE (Asset Limited, Income Constrained, Employed) provide additional data on cost of living to support considering some benefit provision for households up to 400% FPL:

- The Oregon SSS calculates how much income a family must earn to meet basic needs and is derived from the costs of housing, childcare, food, healthcare, and transportation, plus the cost of taxes and impacts of 2021 tax credits.13 In 2021, the Oregon SSS, average across the state of Oregon was $31,521 (245% FPL) for a household/family size of one and $82,447 (311% FPL) for a household/family size of four. The Oregon SSS average for the seven counties that comprise the Portland metro area is higher, at $32,743 (254% of FPL) for a household of one and $86,220 (325% of FPL) for a household of four.
- The ALICE Threshold for Survival estimates a more constrained household budget that represents the bare minimum for families to make ends meet. As a multiple of FPL, the threshold for survival varies greatly depending on household size. Averaged across Oregon, the Household Survival Budget is $25,380 (200% FPL) for a household of one and $75,768 (286% FPL) for a household of four.
- The ALICE Household Stability Budget estimates the higher costs of maintaining a viable household over time, including a 10% savings category that can be used in an emergency, for additional education, or to buy a home.[20] In 2018, the most recent data year, the ALICE was $51,216 (398% FPL) for a household/family size of one and $118,896 (449% FPL) for a household/family size of four.
- In 2022, the average annual income at 400% FPL is $54,360 for a household/family size of one and $111,000 for a household/family size of four.[21] In the Portland region, about 29% of people have incomes from above 200% FPL up to 400% FPL.[22]

[20] https://www.unitedforalice.org/household-budgets-mobile/oregon

[21] Assistant Secretary for Planning and Evaluation. 2022 Poverty Guidelines: 48 Contiguous States (all states except Alaska and Hawaii). https://aspe.hhs.gov/sites/default/files/documents/4b515876c4674466423975826ac57583/Guidelines-2022.pdf. Accessed on June 8, 2022.

[22] U.S. Census Bureau, American Community Survey, 2015 to 2019. S1701 Poverty Status in the Past 12 Months.

8.2.3 Considerations

The eligibility requirements and benefits of a multi-tier program are more nuanced and complicated than for a one-tier program. It may be necessary to determine a separate communication strategy to inform potential applicants about which benefits they are eligible for. Depending on geographic eligibility, ODOT may need to involve agencies outside of the Portland metro area in the messaging campaign to help people experiencing low incomes access the program statewide.

Results from the evaluation framework analysis indicate that a multi-tier program scores the same or better than a one-tier program for all discount options and enrollment processes.

8.2.4 Next Steps

Research and engagement strongly supports providing a multi-tier benefit that includes more than one income threshold. However, additional work is needed to determine the income thresholds for the tiers, particularly the second tier that includes the higher (up to 400% FPL) income threshold.

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Research and engagement strongly supports providing a multi-tier benefit that includes more than one income threshold.

8.3 Use a Verification Process that Leverages Existing Programs and Further Explore Self-Certification to Qualify for Program Enrollment (or Toll Discounts)

8.3.1 Overview

ODOT has heard consistently from EMAC, stakeholders, and community members that enrollment is a priority. Enrollment and/or verification through existing low-income service programs and/or utilizing self-certification would improve the ease of enrollment for applicants. Additionally, these options may reduce ODOT's enrollment administrative cost burden and data privacy risk.

Self-certification would allow applicants to certify their income level without substantiating documents. Applicants may be asked to check a box on the application that says, "I verify that the income I selected is true." The process may require applicants to agree to provide proof of income if requested in the future.[23] Some self-certification methods may include penalties for misstating or falsifying information, although including such a statement on the application can be difficult to follow through on and can serve as an enrollment barrier.

Leveraging existing programs would allow participants to verify their income through enrollment in other programs. For example, partnering with the Integrated Oregon Eligibility Program (Integrated ONE) may alleviate some enrollment administrative burdens of partnering with numerous programs while providing comprehensive coverage of existing programs. Another option raised by stakeholders during the partner engagement period is automatic enrollment for those already enrolled in an existing low-income service program. This option has the potential to greatly increase enrollment in the low-income toll program; however, it poses many questions and challenges.

[23]For a self-certification example see https://www.taptogo.net/LIFE_Application_step1.

8.3.2 Key Findings



EMAC and community partners strongly support a self-certification model that streamlines the low-income toll program benefit enrollment process.



The evaluation framework, discount options with self-certification all received more favorable scores than those with confirmed eligibility.

The proposed low-income toll program has several innate features that make it an unlikely target of systemic fraud, including:

- Benefits cannot be cashed out, because they can only be used for travel on the toll corridors.
- Use of the benefit is limited to specific toll roads only, users would have to live in or travel through the project area.
- Benefits are administered on a small scale, with each person only receiving one instance of the benefit at a time.
- If the benefit takes the form of a credit or a number of free trips, it is limited by design because the value can only be either a certain dollar credit or a set number of free trips—users cannot receive a benefit beyond those set boundaries. Additionally, because the benefit value would be lower (because it is bounded), the incentive to commit fraud is lower.



Enrollment in the two existing low-income toll programs, presented as case studies in Chapter 6, is estimated at less than 10% of the people eligible. Across the United States, enrollment in low-income programs generally does not exceed 60% of eligible individuals. Possible benefits of qualification through existing low-income service program(s) and self-certification, as well as possibly automatic enrollment, include improving the ease of enrollment for travelers, which addresses an enrollment barrier that could contribute to low utilization of program benefits. Another possible benefit includes eliminating or reducing the need for ODOT to collect or process sensitive information.[24]

An enrollment process that takes time and is complicated will very likely deter people experiencing low incomes. In general, people with lower incomes have tighter time constraints than those with higher incomes due to possible combinations of holding multiple jobs, less flexible hours, needing daily time to spend on budgeting, and the inability to pay to help outsource home and family tasks. These are all common possibilities for why people with low incomes tend to have less time to figure out a complicated enrollment process.

ODOT conducted research to identify rates of fraud among self-certification programs as well as low-income service programs more broadly. No reports of large-scale fraud among comparable programs, including ones with self-certification, were identified.

[24] https://pdxscholar.library.pdx.edu/cgi/viewcontent.cgi?article=1008&context=ncpp_pub; https://www.commonwealthfund.org/sites/default/files/documents/___media_files_publications_fund_report_2009_may_1266_summer_increasing_particip_benefit_progs_v3.pdf

8.3.3 Considerations

Automatic enrollment through other programs would lead to increased enrollment and usage, but would also present its own operational challenges and costs, including the challenge of mapping existing transponder account holders to service program participants.

To pursue automatic enrollment through other low-income benefit programs, ODOT would need to identify programs that use the same or lower income-thresholds and consider compatibility with ODOT's back office. The Integrated Oregon Eligibility Program (Integrated ONE) allows eligible applicants to apply and enroll in a number of social and health services programs, such as the Oregon Health Plan, Supplemental Nutrition Assistance Program (SNAP or food stamps), and Temporary Assistance to Needy Families (TANF). Partnering with Integrated ONE may alleviate some enrollment administrative burdens of partnering with numerous programs while providing comprehensive coverage of existing programs in Oregon.

If considering self-certification, additional research would be needed to understand the potential risk and impact of program fraud, as well as to understand the efficacy and trade-offs of fraud prevention strategies. As recommended during the partner engagement period, ODOT could consider ongoing income-verification checks for either heavy users of the program or for randomly selected individuals.

Verifying incomes can be costly and time consuming and poses an added data security risk associated with collecting sensitive information, such as social security numbers and income. Additional research will be useful to help understand privacy concerns and administrative costs of income verification. In addition, ODOT will need to evaluate potential revenue leakage associated with self-certification.

ODOT will need to coordinate with the Washington State Department of Transportation to ensure the certification model(s) decided upon is accessible for Washington residents who wish to register for an account and access the benefit.

Without self-certification, a third-party employee or contractor affiliated with the low-income toll program would have to either confirm applicants' enrollment in the relevant service program or verify income for those not enrolled in other service programs or for benefits with thresholds higher than 200% FPL.

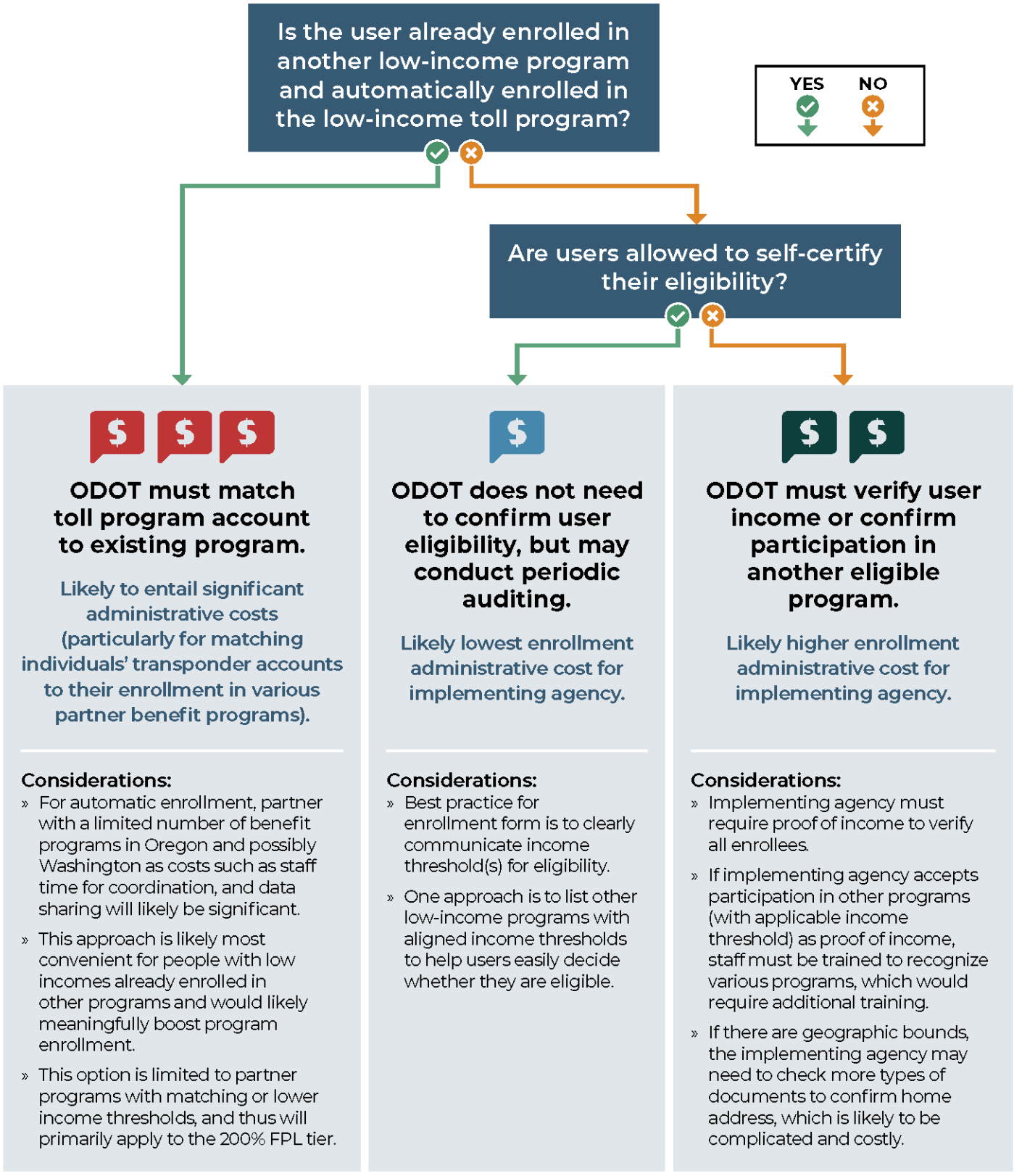
The eligibility cost considerations shown in **Figure 8-2** illustrates the relationship between decisions related to automatic enrollment and self-certification to enrollment administrative costs and a possible approach to partnerships with existing benefit programs.

8.3.4 Next Steps

Further research is needed to understand the administrative costs of income verification to inform decisions on self-certification and verification through other programs. The Virginia Department of Transportation found that the cost of income verification is a sizable share of overall program costs for their low-income toll program.

Further analysis and consideration is needed to understand the costs and benefits of automatic enrollment through participation in other low-income benefits programs. In particular, the administrative process and costs may have implications for the traffic and revenue analyses and will need to be analyzed further. ODOT will have to determine whether automatic enrollment provides a notification to the user that they are invited to enroll in the low-income toll program or whether an account will it automatically be created for them—and furthermore whether a transponder will be automatically sent to the enrollee. The cost and complexity of this option depends on these decisions. ODOT will also need to work with stakeholders and other agencies to identify existing programs where automatic enrollment may be compatible.

Figure 8-2. Eligibility Cost Considerations



Chapter 9: Next Steps and Implementation Practices

This chapter provides an overview of the next steps toward development and eventual implementation of a low-income toll program. It describes the milestones and corresponding timelines that will guide program development. It also presents best practices for implementation that Oregon Department of Transportation (ODOT) and the Oregon Transportation Commission (OTC) will consider as they develop the low-income toll program.

The Low-Income Toll Report reflects a major milestone towards delivery of the low-income toll program. The report explores options for the discount type and income threshold as well as best practices for implementation of an equitable, inclusive Toll Program. After submittal of the report, ODOT, in collaboration with the OTC and in consultation with the Equity and Mobility Advisory Committee (EMAC), will continue analysis, research, and engagement to refine the options for consideration and select the implementation practices that advance equity and are cost effective.

9.1 Next Steps

The next year and a half are critical to establishing a successful low-income toll program that is ready before tolling begins. Between fall 2022 and the end of 2023, the Statewide Toll Rule Advisory Committee (STRAC) will review changes to Oregon Administrative Rules and provide feedback to ODOT on the process to set toll rates; the back-office system configuration will occur concurrently. Both work streams will feed into OTC toll rate setting and rulemaking, which will conclude in mid-2024 with the adoption of toll rates and rules for the I-205 Toll Project. Throughout this time frame, the low-income toll program will be built-out through an iterative process that involves a variety of program milestones. These milestones are presented in below and categorized into the following work efforts:

- Traffic and revenue studies for the I-205 Toll Project and Regional Mobility Pricing Project
- Rulemaking and toll rate setting process
- Back-office system configuration and operations management
- EMAC and engagement
- Oregon Highway Plan (OHP) amendment and statewide policy
- Monitoring and adjustments after implementation



9.1.1 Traffic and Revenue Studies

During the engagement period, project partners raised questions about whether the low-income toll program would undermine congestion management goals for the toll projects on I-5 and I-205. Preliminary analysis indicates that the low-income discount or credit program would have minimal impacts. However, current analysis incorporates simplified assumptions and more effort is needed to study the precise options for consideration presented in this report.

Through the traffic and revenue studies for the I-205 Toll Project and Regional Mobility Pricing Project, ODOT will analyze discount and income threshold options by studying how different options could change the base traffic and revenue forecasts. The analysis will require both modeling and off-model spreadsheet calculations and may require demographic data and additional assumptions. A methodology will be developed to define those assumptions, including the expected percentage of eligible customers that would enroll and how frequently they travel. The modeled enrollment figure will be researched and estimated based on the benefit level being modeled (e.g., higher benefits lead to greater enrollment), the ease of enrolling in the program, transponder balance and credit card requirements, enrollment in comparable regional benefit programs, and outreach or survey results. Lastly, the traffic and revenue studies will consider revenue leakage associated with the low-income toll program, if any, with special consideration towards self-certification and/or the offering of a full exemption.

- **Timing:** The traffic and revenue studies involve three levels of analysis with increasing rigor, time and costs. The Final Traffic and Revenue Study is expected to be available in 2024 for the I-205 Toll Project and in 2025 for the Regional Mobility Pricing Project.

9.1.2 Rulemaking and Toll Rate Setting

The STRAC will review and recommend updates to modernize toll-related rules, align them with legislative direction, and add needed clarity for toll operations, including customer interaction with the toll system. It will also provide a recommendation to ODOT on the process for setting toll rates by way of rulemaking. Upon receiving the STRAC's recommendation, ODOT will begin an iterative, 6-month process with the OTC to refine toll rates and rules. The process will conclude with the OTC adopting toll rates and rules, including rates with income-based adjustments and rules that apply to the low-income toll program.

- **Timing**: The STRAC will be established in late 2022 and will develop recommendations through the end of 2023. The OTC will adopt toll rates and rules in mid-2024.

9.1.3 Back-Office System Configuration and Operations Management

The back-office system can be designed to offer a range of discount or credit programs and eligibility rules for people experiencing low incomes to gain access to the discount or credit program. Whatever discount type and income threshold are decided upon will be built into the back-office system before tolling begins. Wherever possible, the Toll Program will look for opportunities to streamline implementation and operations. ODOT will continue to explore self-certification and partnerships with other programs for verification and potentially automatic enrollment. If it is not possible to determine eligibility through existing programs or solely through self-certification, ODOT will need to identify a third-party verification vendor.

A critical component of building out the low-income toll program is defining geographic eligibility and working with community members and project partners in southwest Washington. During engagement on the report, project partners and EMAC asked questions and expressed concerns about how people experiencing low incomes from outside the Portland region would be affected by tolling. While there are advantages and disadvantages to limiting geographic eligibility, defining geographic eligibility may be unnecessary because access to the discount will require an account and infrequent users from outside the Portland metro area are unlikely to register. Another consideration is transactional costs: allowing eligible applicants who live outside Oregon and southwest Washington to enroll may be less costly than verifying the address of every applicant. Further research and engagement, including interaction with other toll programs in Washington in particular, is needed to define geographic eligibility.

Many of the implementation practices described in Section 9.2 are applicable to back-office system configuration and operations management. These include implementation practices related to transponders and account maintenance, a cash-based option, enrollment, compliance, and penalties. Operations management specialists will advise on the costs to implement these best practices, and ODOT will work with EMAC and community partners to continue analyzing and prioritizing best practices for people experiencing low incomes.

- **Timing**: The back-office system configuration will occur from fall 2022 to the end of 2023, in parallel with the STRAC rulemaking and toll rate setting process.



9.1.4 EMAC and Public Engagement

EMAC's mission is to partner with ODOT to implement the Oregon Toll Program's Equity Framework at each stage of project development. Following the receipt of ODOT's support and guidance for next steps, EMAC will continue to provide input on new and bold ways to address equity in the I-205 Toll Project and Regional Mobility Pricing Project.

Public and partner engagement will continue as part of the environmental review phase for the Regional Mobility Pricing Project and I-205 Toll Project. ODOT and the OTC will invite ongoing input from stakeholders and the public to continue to inform low-income toll program development, including final selection of the discount type and income threshold.

- **Timing**: EMAC will continue meeting and providing feedback to ODOT and the OTC from fall 2022 through 2023. Partner and public engagement for the I-205 Toll Project and Regional Mobility Pricing Project is ongoing and will occur through the completion of the environmental review processes for both projects.

9.1.5 Oregon Highway Plan Amendment and Statewide Policy

ODOT is currently amending the OHP to provide clarity around pricing and tolling to recognize new opportunities and support implementation. Policy updates are also needed to address evolving equity, climate, safety, modernization, and funding goals. As ODOT undergoes the OHP amendment process, it will ensure the updates support the low-income toll program. In addition, ODOT will monitor and update statewide policy, as needed, to support advancement and implementation of the options and best practices presented in this report.

- **Timing**: ODOT anticipates that the OTC will adopt the OHP amendment in late fall 2022 to inform the rulemaking and rate setting process.

9.1.6 Monitoring and Adjustments after Implementation



After the low-income toll program is implemented, program performance will be reviewed through ongoing traffic and revenue monitoring, engagement with eligible program participants, and partnerships with community-based organizations. Programmatic review may include adjusting the program if it does not adequately meet equity and project goals, improving customer service, and/or identifying opportunities to increase enrollment. Experience from Virginia's program shows that a steering committee or equity panel for programmatic review can help people experiencing low incomes shape the program on an ongoing basis. Additionally, in July 2022 OTC accepted EMAC's recommended actions, which included continued support for a toll equity accountability committee (or another structure) that provides a forum for equity voices to monitor, evaluate, and provide feedback on enrollment in and economic impacts of the low-income toll program over time.

- **Timing**: Monitoring would begin in coordination with the start of tolling, which is planned for 2024 for the I-205 Toll Project and 2025 for the Regional Mobility Pricing Project.

9.2 Implementation Practices

This section discusses the best practices to consider when implementing the low-income toll program. Relevant examples from other low-income programs are provided as appropriate. These best practices include the following:

- Transponders and account maintenance
- Provide a cash-based payment option
- Program communications and outreach
- Develop an inclusive enrollment process
- Develop monitoring, review, and adjustment process
- Prevent debt and criminal penalties

9.2.1 Transponders and Account Maintenance

> *Provide free transponders and work with community-based organizations to help enroll people. Do not require a minimum dollar amount of balance to load or maintain the transponder account.*

ODOT currently plans to issue transponders to all users free of charge. While stakeholder feedback indicates that a transponder credit may be an insufficient benefit on its own, it can be a complementary program component to support program enrollment. Additionally, stakeholders support measures to address enrollment barriers.

Transponder installation could be coupled with Department of Environmental Quality vehicle testing processes. For example, a driver who brings their car in for a smog check could get a toll transponder installed in the same visit. Members of an EMAC subcommittee emphasized the importance of easy access to transponders by making them available at local retail locations (such as grocery and convenience stores), as well as dispensing them through community-based organizations.

Having no minimum balance requirements would alleviate additional burdens for people experiencing low incomes, but it also would raise invoicing costs, which leads to leakage. If having no minimum balance requirement is not feasible, explore a low balance requirement, such as $5 (TriMet's minimum load value).

Case Study:
The LA Metro Low Income Assistance Plan allows credits to be applied to the cost of the transponder and waives the $1 monthly account maintenance fee, recognizing that transponder purchase costs can be a barrier for corridor users experiencing low incomes.

Case Study:
The Virginia Department of Transportation Toll Relief Program dropped the minimum balance on the transponder from $35 to $20.

9.2.2 Provide a Cash-Based Payment Option

Provide a cash-based option for toll payment in order to engage potential applicants who are unbanked.

Some individuals do not have a bank account or prefer to use alternative financial services. Others would prefer not to share banking information with a government agency. Providing a cash-based option to load transponders addresses these concerns and is supported by stakeholders. Ideally, cash loading should occur in local communities (e.g., at local stores) and should not have surcharges. ODOT is already considering this option for the toll program overall.

9.2.3 Program Communications and Outreach

Conduct extensive marketing, promotion, and engagement with community-based organizations that starts at least 6 months before tolling begins. Post signage so that travelers can make informed decisions.

Feedback from EMAC, low-income discussion groups, social service providers, and community organizations all recommend selecting the low-income toll benefit and enrolling people in the program before tolling begins. ODOT will need to consider the timeline for program decision-making, marketing, and outreach.

A benefit of scheduled variable-rate pricing is the ability for drivers to know the toll rate before they travel. Signage communicating rates facilitates predictability and transparency.



9.2.4 Develop an Inclusive Enrollment Process

Create an in-person and online enrollment process that is accommodates participants with disabilities, who have limited technology access or training, who speak languages other than English, and who live far away from existing customer service centers.

The Portland region is a diverse place with people of many abilities and with varying degrees of access to technology. Online resources, such as a website and mobile app, can reach a wide audience. But for those with limited technology access or training, stakeholders support offering an in-person option to provide an inclusive and accessible customer service experience. This can serve as a test bed to see if that would be successful in the statewide program.

Partnering with Oregon Driver and Motor Vehicle Services (DMV) or other social services sites could help enroll users living within and outside the Portland metro area in the low-income toll program. ODOT is already considering stationing customer service representatives at DMVs. Other potential channels include payment platforms like PayNearMe and InComm.

All enrollment options should be compliant with the American with Disabilities Act, accessible by multiple forms of transportation, and open for longer hours. Application materials should be available in multiple languages.

Case Study:
TriMet allows Hop card holders to load money on their accounts at local grocery and convenience stores.

Case Study:
LA Metro's LIFE program encourages enrollment by allowing in-person registration at pop-up locations and community fairs.

9.2.5 Develop Monitoring, Review, and Adjustment Process

Support a monitoring, review, and adjustment process for the low-income toll program that includes community voices and a process that is aligned with the Oregon Toll Program's Equity Framework.

Ongoing engagement and consultation with historically underrepresented and underserved communities in program monitoring, reporting, and programmatic changes facilitates building community understanding, capacity, trust, and support. It can also help planners and policymakers interpret data in local context and make more informed decisions for the low-income toll program. This best practice would be applied as part of customer/user engagement. Experience from the Virginia Department of Transportation indicates that a steering committee or equity panel can help people experiencing low incomes continue to shape the program on an ongoing basis.

9.2.6 Prevent Debt and Criminal Penalties

Offer education opportunities, additional time to pay toll charges, multiple notices of account balances, or set a maximum penalty amount.

Tolling should not contribute to more financial indebtedness for people experiencing low incomes, nor should it lead to criminal penalties. The existing rules for failure to pay tolls are established in Oregon law (ORS 383) and rules (731-040-0064). ODOT will need to consider the timeline, process, and consistency for defining a waiver of fines or penalties in rule. EMAC members support a programmatic emphasis on accessibility rather than punitive enforcement. For program administration, ODOT should consider applying the same rules to all accounts within the low-income toll program.

9.2.7 Develop an Equitable Operation and Implementation Plan

Work with the toll implementation team to develop a concept of operations for the low-income toll program that includes the schematic process for penalties that users are subject to for toll violations (i.e. initial penalty followed by a failure to comply penalty).

More work is needed to develop an operational design and implementation plan establishing the program details, specific policies, and technical system requirements that will enable more precise analysis and estimation of long-term program costs and impacts on toll revenues and performance. The concept of operations should include the schematic process for penalties that users are subject to for toll violations (i.e., initial penalty followed by a failure to comply penalty).



Appendix:

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A: Low-Income Benefit Programs and Thresholds







A.1 Federal Programs

The U.S. Department of Agriculture's Supplemental Nutrition Assistance Program (SNAP) provides food benefits to low-income households based on household size. As shown in Table A 1, the income thresholds for eligibility are calculated based on a maximum income of $16,744 for a one-person household and an additional $5,902 for each additional person in the household. In addition, the applicant must have a current bank balance (savings and checking combined) under $2,001 or have a current bank balance under $3,001 and share their household with either a person aged 60 and over or a person with a disability.

Table A-1. Annual Household Income Limits (Before Taxes)

Household Size[1]	Maximum Income Level (Per Year)
1	$16,744
2	$22,646
3	$28,548
4	$34,450
5	$40,352
6	$46,254
7	$52,156
8	$58,058

Source: U.S. Department of Agriculture's Supplemental Nutrition Program (SNAP) for Oregon. https://www.benefits.gov/benefit/1332.

[1]For households with more than eight people, add $5,902 per additional person. Always check with the appropriate managing agency to ensure the most accurate guidelines.

The U.S. Department of Health and Human Services' Poverty Guidelines for 2022 are as shown in Table A 2. The guidelines are calculated based on an income of $13,590 for a one-person household and an additional $4,720 for each additional person in the household. These guidelines are used by programs (directly or percentage multiples) such as Head Start, SNAP, the National School Lunch Program, the Low-Income Home Energy Assistance Program, and the Children's Health Insurance Program.

Table A-2. Poverty Guidelines for 2022

Persons in Family/Household[1]	Poverty Guideline
1	$13,590
2	$18,310
3	$23,030
4	$27,750
5	$32,470
6	$37,190
7	$41,910
8	$46,630

Source: 2022 Poverty Guidelines for the 48 Contiguous States and the District of Columbia, from the Office of the Assistant Secretary for Planning and Evaluation, U.S. Federal Poverty Guidelines used to determine financial eligibility for certain programs. https://aspe.hhs.gov/topics/poverty-economic-mobility/poverty-guidelines.

[1]For families/households with more than 8 persons, add $4,720 for each additional person

A.2 Local, Regional, and State Programs

This section provides summaries of relevant low-income programs that have been implemented by states, cities, and regional agencies.

OREGON HOUSING AND COMMUNITY SERVICES PROGRAMS

Oregon Housing and Community Services offers two programs that help low-income households with utility payments: Low-Income Home Energy Assistance Program and Oregon Energy Assistance Program. Households with incomes below 60% of Oregon's median income are eligible, based on household income and household size.

OREGON TRAIL CARD – ELECTRONIC BENEFITS TRANSFER (EBT) CARD

The Oregon Trail Card used for state benefits include SNAP food benefits and Temporary Assistance for Needy Families (TANF) cash benefits. Benefits are deposited into the account each month, and the card functions like a debit card.

For families and single adults without a disability, eligibility for SNAP food benefits can be determined via 65 Oregon Department of Human Services Self-Sufficiency offices in the state (examples for different family types are provided in **Figure A-1**). For seniors and people living with disabilities, eligibility is determined via 76 Oregon Department of Human Services Aging and People with Disabilities and Area Agency on Aging offices in the state. Applications may be emailed or dropped off in person, mailed, or faxed to the appropriate office.

TANF is available for people who live in Oregon, experience low income and have very few assets, and are either 18 or younger and head of their household, are pregnant, or have a child who is 18 or younger. Eligibility is determined via 65 Oregon Department of Human Services Self-Sufficiency offices in the state (examples for Oregon counties are provided in **Figure A-2**). Applications may be emailed or dropped off in person, mailed, or faxed to the appropriate office. People who qualify for TANF are also eligible for employment and training via Oregon's Jobs Opportunity and Basic Skills (JOBS) program.

UTILITY BILL PAYMENT ASSISTANCE (OREGON)

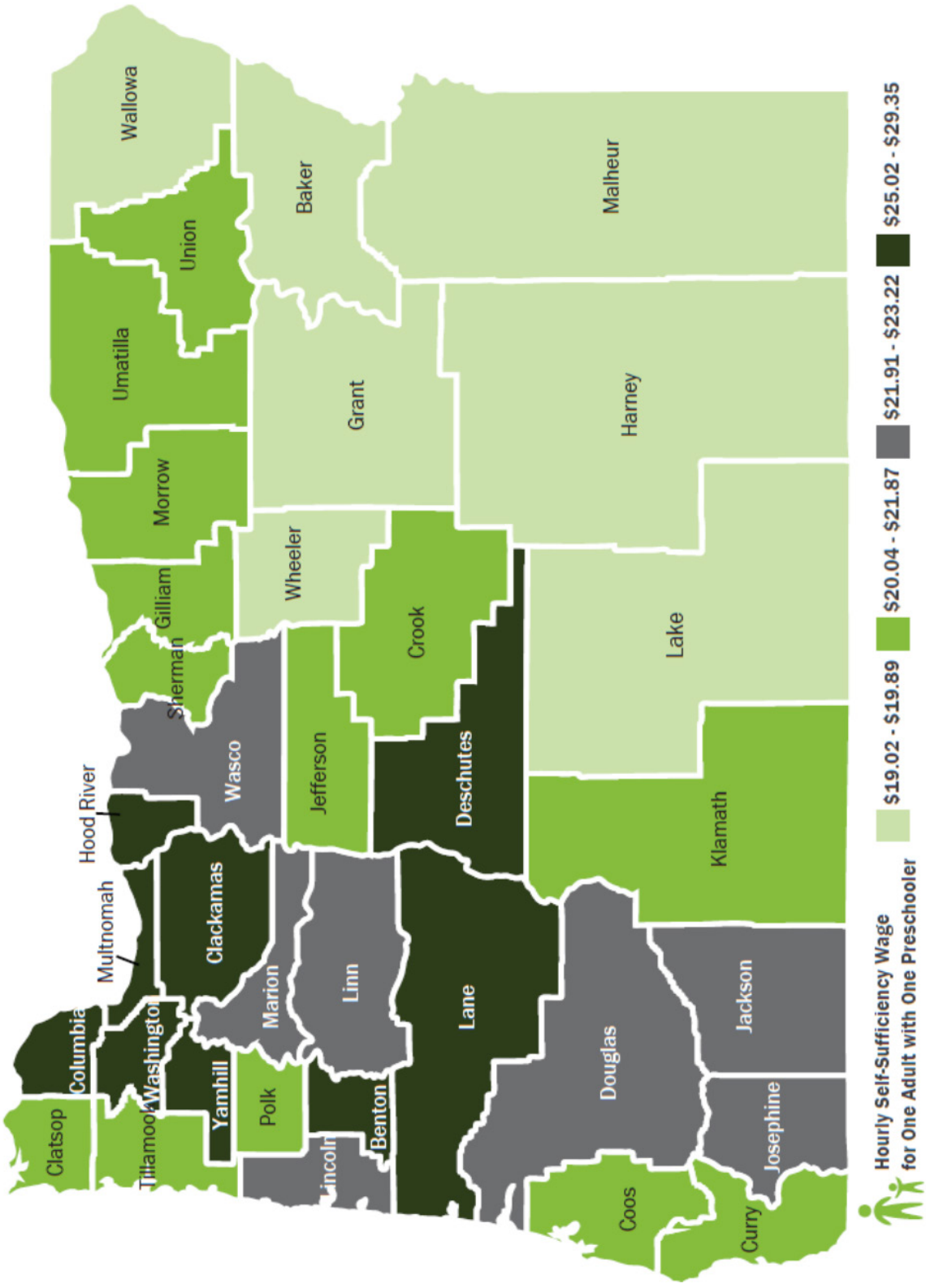
Oregon Housing and Community Services offers two programs that help low-income households with utility payments: Low-Income Home Energy Assistance Program and Oregon Energy Assistance Program. The Low-Income Home Energy Assistance Program helps participants with energy expenses and may help repair or replace heating systems as well as improve household energy efficiency through the Weatherization Program. Oregon Energy Assistance Program assists households at risk of losing electricity access. Both programs are administered by Community Action Agencies with Oregon Housing and Community Services funding; each of Oregon's 36 counties has a Community Action Agency. Households with incomes below 60% of Oregon's median income are eligible, based on household income and household size. Both renters and owners are eligible, but benefit levels may vary for renters based on rental or utility agreements and landlord cooperation.

Figure A-1. The Self-Sufficiency Standard for Select Family Types (Multnomah County, Oregon 2021)

	1 ADULT	1 ADULT 1 PRESCHOOLER	1 ADULT 1 PRESCHOOLER 1 SCHOOL-AGE	2 ADULTS 1 PRESCHOOLER 1 SCHOOL-AGE
MONTHLY COSTS				
Housing	$1,327	$1,531	$1,531	$1,531
Child Care	$0	$1,258	$2,081	$2,081
Food	$306	$463	$701	$942
Transportation	$100	$100	$100	$200
Health Care Net	$168	$536	$574	$647
Premium	$95	$444	$444	$444
Out-of-Pocket	$73	$92	$130	$203
Miscellaneous	$190	$389	$499	$540
Taxes (Net)	$535	$793	$924	$930
Federal Income Taxes	$173	$397	$590	$540
Payroll Taxes	$204	$393	$497	$532
State Income Taxes	$159	$304	$387	$407
Federal Child Tax Credit (-)	$0	($300)	($550)	($550)
SELF-SUFFICIENCY WAGE				
Hourly**	**$14.92**	**$28.81**	**$36.42**	**$19.52 (per adult)**
Monthly	$2,627	$5,070	$6,409	$6,871
Annual	$31,521	$60,846	$76,912	$82,447
Emergency Savings Fund	$33	$119	$265	$65
TOTAL RESOURCES (YEARLY)				
Federal & Oregon Earned Income Tax Credit (EITC)	$0	$0	$0	$0
Federal Child and Dependent Care Tax Credit (CDCTC)	$0	$4,000	$8,000	$8,000
Oregon Working Family Household and Dependent Care Credit (WFHDC)	$0	$0	$0	$0
Net Resources	$31,521	$64,846	$84,912	$90,447

* The Standard is calculated by adding expenses and taxes and subtracting tax credits.
** The hourly wage is calculated by dividing the monthly wage by 176 hours (8 hours per day times 22 days per month). The hourly wage for families with two adults represents the hourly wage that each adult would need to earn, while the monthly and annual wages represent both parents' wages combined. Note: Totals may not add exactly due to rounding.

Figure A-2. Counties by Level of Hourly Self-Sufficiency: One Adult and One Preschooler (Oregon 2021)



PORTLAND TRI-COUNTY METROPOLITAN TRANSPORTATION DISTRICT OF OREGON (TRIMET) LOW-INCOME FARE PROGRAM

Seniors aged 65+, people on Medicare, people with a disability, and people experiencing low incomes, termed Honored Citizens, are eligible for 50% to 72% less than Adult fare. Discounts apply to rides on buses, MAX, WES, Portland Streetcar, and C-TRAN. An ID is required for proof of eligibility upon boarding. After spending $2.50 in a day or $28 in a calendar month, Honored Citizens may ride for free. Payment options for Honored Citizen fares include a paper Hop ticket available at MAX/WES stations, a virtual Hop card in the Hop app, or a physical Hop card that can be bought ($3 for a card) and reloaded (via Hop website, app, or phone hotline) at more than 500 local retailers including supermarkets, pharmacies, and convenience stores. Physical Hop cards do not require a bank account, credit card, smartphone, or Internet access. Honored Citizen discounts are not available through the mobile wallet or physical bankcard (direct tapped on Hop readers) options. **Table A-3** provides a program summary.

Table A-3. Portland Tri-County Metropolitan Transportation District of Oregon (TriMet) Low-Income Fare Program

Program Category/ Enrollment Requirement	Program Details
Facility Type	Mass Transit Fair
Tiered Benefits?	No
Program Features	▸Low-income users receive discounts of 50% to 72% off the adult fare, depending upon whether fares are for single ride, day pass, or monthly pass. ▸Users automatically qualify with enrollment in Oregon Health Plan, SNAP, Energy Assistance, Free/Reduced Lunch, HUD Assistance, TANF, or Employment DayCare
Income Requirements	200% FPL or below.
Proof of Income	WorkSource employment/wage verification, Current IRS transcript, W2 form from the most recent tax year, signed copy of federal tax return, or unemployment benefit letter and current weekly pay stub.
Residence Requirements	Oregon State
Proof of Residence	Valid government-issued ID
Enrollment Method	Online application, req. document upload and video enrollment call. Hop cards must be picked up in person at the TriMet Ticket Office at Pioneer Courthouse Square.[1]

[1] https://trimet.org/lowincome/

KING COUNTY METRO SUBSIDIZED/REDUCED TRANSIT FARE (WASHINGTON)

Table A-4 provides a program summary of this low-income transit program implemented by King County, Washington.

Table A-4. King County Metro Subsidized/Reduced Transit Fare

Program Category/ Enrollment Requirement	Program Details	
Facility Type	Mass Transit Fair	
Tiered Benefits?	Yes	
Program Features	Subsidized annual pass,[1] which allows free ($0) fare for select road-based transit services (King County Metro buses, RapidRide, Access, Via to Transit, Sound Transit express buses), water (King County Water Taxi), and rail (Seattle Center Monorail, Seattle Streetcar, Link Light Rail, Sounder commuter train); reduced fare for other transit modes is also available through the E-purse available through the ORCA card.	ORCA LIFT, a transit pass with reduced fares.[2] Discounts range widely depending on mode and provider, from 25% (Everett Transit) up to 74% (Sounder Train). Both Pierce Transit and Washington State Ferries do not participate in the discount program.
Income Requirements	80% FPL or below plus enrollment in one of six state benefit programs.	200% FPL
Proof of Income	Temporary Assistance for Needy Families (TANF)/State Family Assistance (SFA); Refugee Cash Assistance (RCA); Aged, Blind or Disabled Cash Assistance (ABD); Pregnant Women Assistance (PWA); Supplemental Security Income (SSI); and Housing and Essential Needs (HEN).	Proof of enrollment in certain state programs, letters or other proof of employment or unemployment, or tax returns.
Residence Requirements	Yes, King, Pierce, and Snohomish counties	No
Proof of Residence	Valid government-issued ID	N/A

Program Category/ Enrollment Requirement	Program Details	
Enrollment Method	Enrollment verification occurs by telephone or in person at Washington State Department of Social and Health Services, Seattle & King County Department of Public Health, and non-profit Catholic Community Services across King, Pierce, and Snohomish counties; or online through the King County Reduced Fare Portal. Online application requires uploading images of verification documents, including photo ID.	Enrollment verification occurs by calling the King County Community Health Access Program, applying online using the Reduced Fare Portal, or visiting authorized enrollment offices in King County.

Note: Multiple columns under Program Details indicate multiple benefits.

[1] https://kingcounty.gov/depts/transportation/metro/fares-orca/subsidized-annual-pass.aspx

[2] https://kingcounty.gov/depts/transportation/metro/fares-orca/orca-cards/lift.aspx

LA METRO LOW-INCOME AND TRANSIT-RIDER CREDIT AND WAIVER OF RECURRING FEES (CALIFORNIA)

Table A-5 provides a program summary of this low-income transit program implemented in Southern California.

Table A-5. LA Metro Low-Income and Transit-Rider Credit and Waiver of Recurring Fees

Program Category/ Enrollment Requirement	Program Details
Facility Type	Highway Toll/Mass Transit Fare Cross-Benefits
Tiered Benefits?	No
Program Features	▸Low-income users receive one-time $25 toll credit and waiver of $1 monthly account maintenance fee ▸Users who ride the buses on the express lanes receive a $5 toll credit for every 16 bus trips ▸Spends net toll revenues of neighborhood projects ▸Users must have an electronic fare (TAP) card
Income Requirements	200% FPL or below
Proof of Income	Check stub, EBT card, proof of free-reduced school lunch receipt
Residence Requirements	Yes, Los Angeles County

Program Category/ Enrollment Requirement	Program Details
Proof of Residence	Photo ID
Enrollment Method	Enrollment verification requires users to travel to or call a customer service center and show/fax proof of Los Angeles County residence as well as income

ELIZABETH RIVER TUNNELS (VIRGINIA)

Table A-6 provides a program summary of this low-income discount toll program implemented in Virginia.

Table A-6. Elizabeth River Tunnels

Program Category/ Enrollment Requirement	Program Details
Facility Type	Tunnel Toll
Tiered Benefits?	No
Program Features	Low-income users receive a 50% discount for 2-axle tolls in the Downtown and Midtown tunnels for up to 10 trips per week.[1]
Income Requirements	$30,000 annual income (approx. 200% FPL) or below
Proof of Income	Acceptable documents include W-2, 1099-MISC, One month of pay stubs, IRS 1040, Employer's statement, Self-declaration of no income.
Residence Requirements	Yes, Portsmouth City or Norfolk City Counties
Proof of Residence	Driver's license, utility bill, bank account statement, property tax bill, proof of home ownership, or rental contract
Enrollment Method	Enrollment verification requires users to apply at an E-ZPass customer service center in Norfolk or Portsmouth.

[1] https://www.virginiadot.org/newsroom/statewide/2021/enrollment-now-open-for-2022-vdot-toll-relief-program12-1-2021.asp#:~:text=Beginning%20December%201%2C%202021%2C%20Norfolk,to%2010%20trips%20per%20week.

TREASURE ISLAND MOBILITY MANAGEMENT AGENCY LOW-INCOME TOLL PROGRAM (CALIFORNIA)

Table A-7 provides a program summary of this low-income toll program implemented by the San Francisco County Transportation Authority.

Table A-7. TIMMA Low-Income Toll Program (Planned)

Program Category/ Enrollment Requirement	Program Details	
Facility Type	Cordon Per-Direction Toll	
Tiered Benefits?	Yes	
Program Features	▸Estimated start date is 2024 ▸Non-resident private vehicles will be tolled when entering and exiting the island at $5 per-direction peak and $2.50 per-direction off-peak. Households with moderate and low incomes are eligible for a 50% discount. ▸Households with very low incomes are eligible for toll exemption. ▸Treasure Island residents will be exempt from the toll. ▸Spends net toll revenue on expanded transit service and mobility improvements. ▸Treasure island employers will also be provided a quarterly subsidy, which may be used to compensate employees with low incomes or add cash value to toll tags.[1]	
Income Requirements	Less than 55% Area Median Income	55-120% than Area Median Income
Proof of Income	Unknown	Unknown
Residence Requirements	Yes	Yes
Proof of Residence	Toll only applies to non-residents	Toll only applies to non-residents
Enrollment Method	Unknown	Unknown

Note: Multiple columns under Program Details indicate multiple benefits.

SFCTA= San Francisco County Transportation Authority; TIMMA = Treasure Island Mobility Management Agency

[1] https://www.sfcta.org/sites/default/files/2022-01/TIMM_PIR_2021_2022-01-21.pdf

MEDELLÍN, COLOMBIA

The Metro de Medellín in Colombia is included in this list of programs because it offers a wide range of tiered fare options for a variety of transit modes in the city, including rail, bus, and gondola. Tiered fares are determined by average neighborhood income, and the lowest tiers pay a small percentage of full fare. Gondola lines like the Cable Arví, which travel between the city center and the neighborhoods and parks in the surrounding hills, have a qualification system based on Colombia's SISBEN system, where the economic wellbeing of individual households are evaluated for the purpose of selection for social programs.

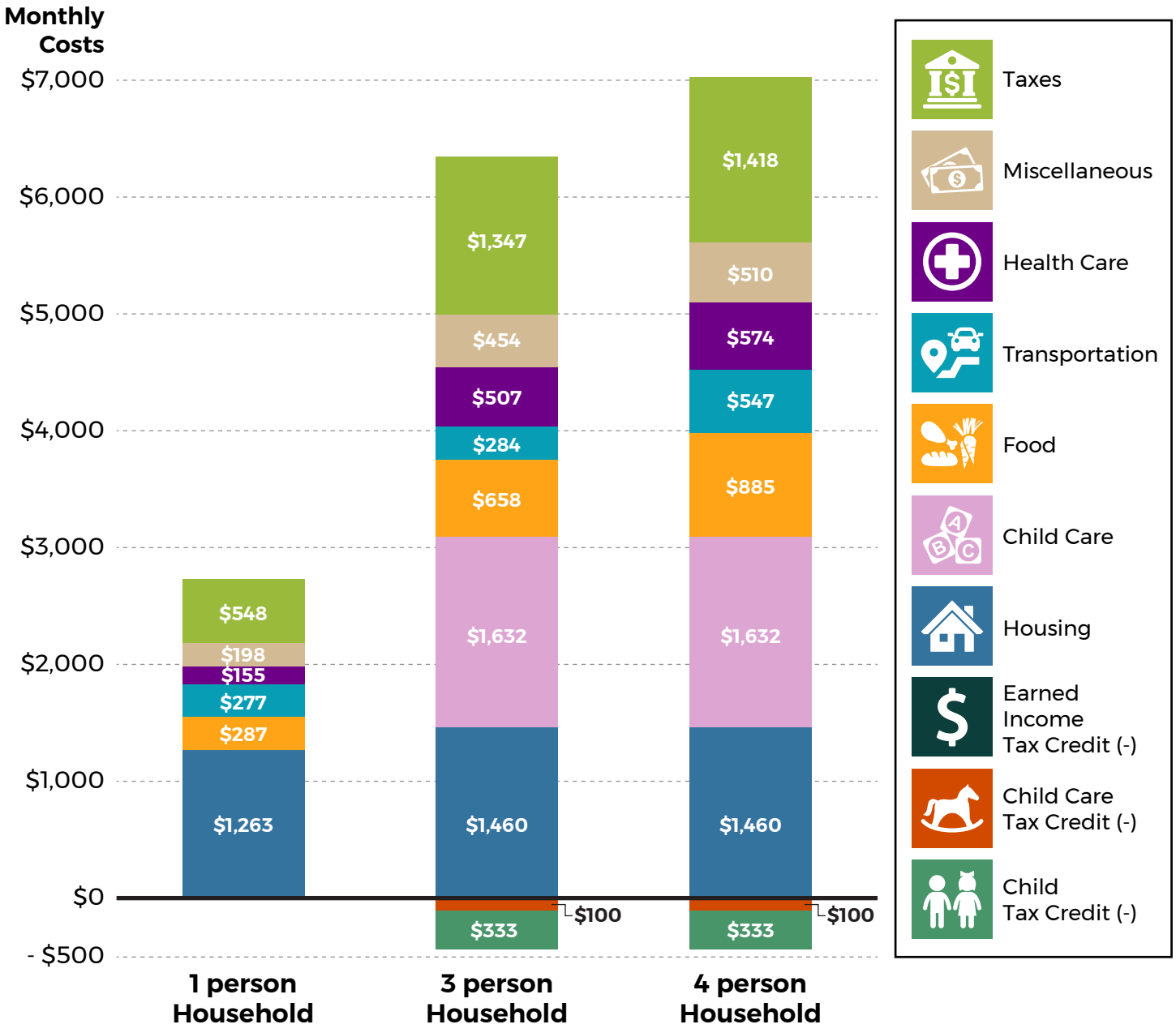
A.3 Regional Incomes, Cost of Living, and Eligibility Thresholds

Many of the above toll equity programs use the federal poverty level (FPL) as a reference to determine eligibility for benefits. FPL is a national standard, allowing it to be easily referenced and understood; however, it does not always reflect the current cost of basic household necessities or differences in cost of living across specific geographies in the United States. Depending on the median income in an area, people experiencing low incomes or very low incomes compared to other members of their local community may still have incomes that fall above the FPL, even though the local cost of living may exceed their income. Portland, and the other geographies listed above, fall into this category, and may benefit from using a multiple (e.g., 200%) of the FPL as a threshold. However, this threshold should be specific to local conditions, such as those shown in **Figure A-3**, to ensure that the full focus population of benefit recipients can be eligible.

Another way to compare local income distributions is ALICE (Asset Limited, Income Constrained, Employed) methodology. This strategy uses a standardized set of measurements to quantify the cost of a basic household budget in each county of partner states. The ALICE threshold represents the minimum income level necessary for survival for a household and is derived from the ALICE Household Survival Budget—the bare minimum cost of household basics including housing, child care, food, transportation, technology, and health care, plus taxes and contingency equal to 10% of household budget. See **Figure A-4** for the 2018 thresholds across Oregon counties.

Table A-8 summarizes ALICE and FPL data for each geography noted above, with the exception of California where only FPL data is available.

Figure A-3. Budget Comparison (Oregon 2018)



	1 person Household	3 person Household	4 person Household
Monthly Total	$2,729	$5,909	$6,593
Annual Total	$32,748	$70,908	$79,116

Source: University of Washington. 2020 and 2021.
The Self-Sufficiency Standard for Oregon (https://selfsufficiencystandard.org/oregon/) and
The Self-Sufficiency Standard for Washington (https://selfsufficiencystandard.org/washington/).

Notes:
- Washington data (Clark and Skamania counties) is from 2020
- Oregon data (Clackmas, Columbia, Multnomah, Washington, and Yamhill counties) is from 2021
- 1 person household = 1 adult
- 3 person household = 1 adult, 1 preschooler, 1 school age child
- 4 person household = 2 adults, 1 preschooler, 1 school age child

Figure A-4. Library Locations and Household Below ALICE Threshold (Oregon 2018)

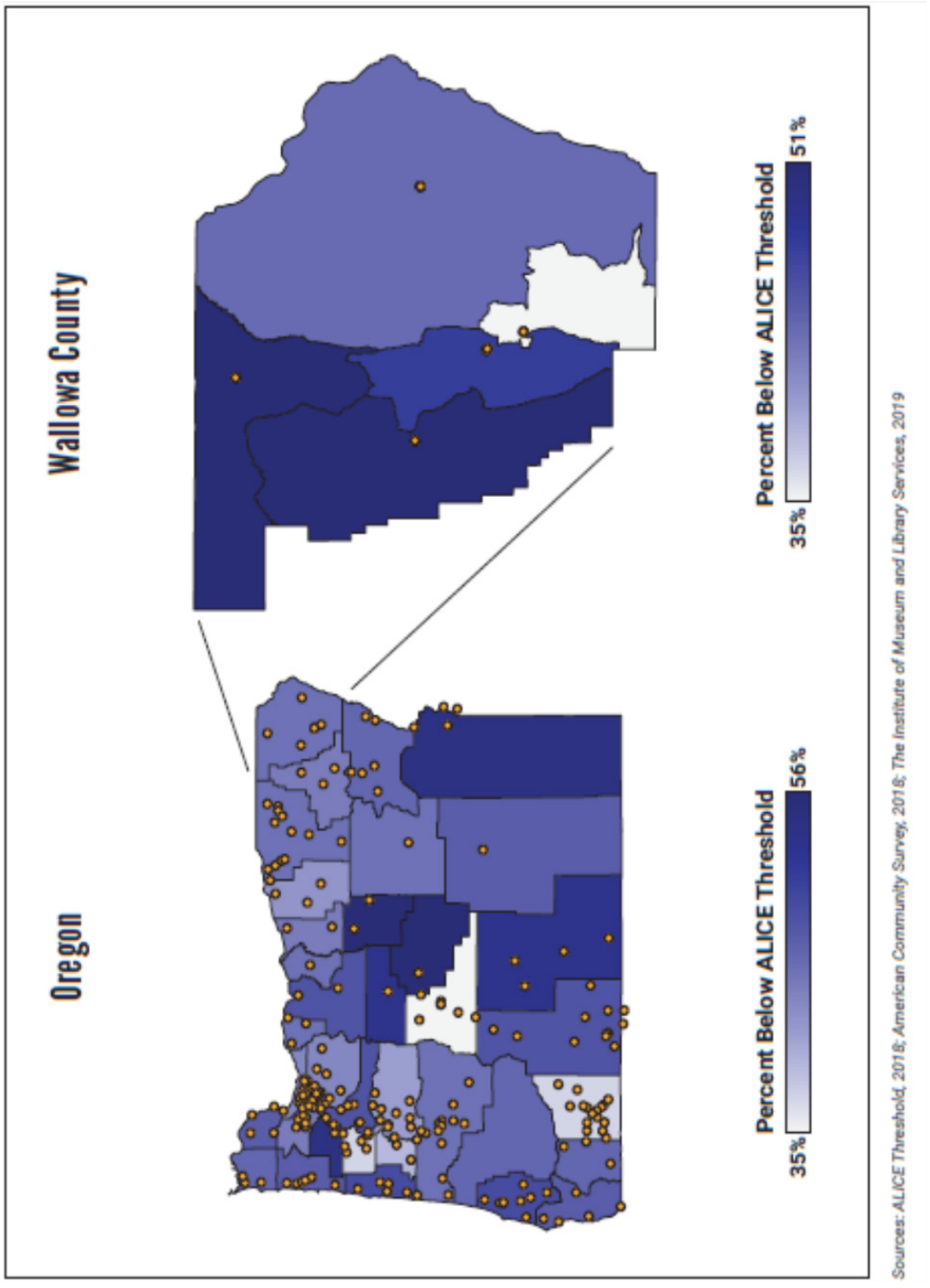


Table A-8. ALICE and FPL Data for Each Geography

Data Type	ALICE (Asset Limited, Income Restrained, Employed)	Self-Sufficiency Standard for Oregon
Organization	United For ALICE	Worksystems
Organization Description	Driver of innovation, research, and action to improve life across the country for ALICE (Asset Limited, Income Constrained, Employed) and for all. Through the development of the ALICE measurements, a comprehensive, unbiased picture of financial hardship has emerged.	Non-profit agency that accelerates economic growth in the City of Portland, Multnomah and Washington counties by pursuing and investing resources to improve the quality of the workforce.
Update Frequency	Bi-annually	Annually (since 2020, every three years), though individual data sources depend on individual update frequency
Most Recent Update	2018	2021
Philosophy (i.e. what is it trying to accomplish?)	Based upon the highest quality, unbiased data we are able to measure financial hardship and understand why so many households struggle to make ends meet. Each ALICE report contains data on household budgets, demographics, employment opportunities, housing affordability, public and private assistance, and other critical economic factors.	Comprehensive, credible, user-friendly tool to ensure the best data and analyses are available to enable Oregon's families and individuals to make progress toward real economic security.

Data Type	ALICE (Asset Limited, Income Restrained, Employed)	Self-Sufficiency Standard for Oregon
Methodology (i.e. what is it counting and how?)	Measure calculates how much income a family must earn to meet basic needs without private or public assistance, varying by family composition, which city or county they live in Oregon, and accounting for the need for emergency savings (10% contingency). Based on the costs of basic needs for working families: housing, child care, food, health care, transportation, miscellaneous items, the cost of taxes, and technology.	Measure calculates how much income a family must earn to meet basic needs without private or public assistance, varying by family composition, which city or county they live in Oregon, and accounting for the need for emergency savings. Based on the costs of basic needs for working families: housing, child care, food, health care, transportation, and miscellaneous items, and the cost of taxes and impacts of tax credits like the American Rescue Plan Act of 2021
Geographies	All counties in Arkansas, Connecticut, Delaware, Florida, Hawaii, Idaho, Illinois, Indiana, Louisiana, Maryland, Michigan, Mississippi, New Jersey, New York, Ohio, Oregon, Pennsylvania, Tennessee, Texas, Virginia, Washington, West Virginia, and Wisconsin	All counties in Oregon, specific cities such as Portland; also, 41 states, the District of Colombia, and New York City
Website	https://www.unitedforalice.org/state-overview/Oregon	www.selfsufficiencystandard.org/Oregon
Data Availability	Excel file with ALICE data for all family types in every Oregon county	Excel file with Self-Sufficiency Standard data for all family types in every Oregon county
Use in other programs in Oregon	Only information for Pacific NW: Avista, Ford Family Foundation, Idaho Community Foundation, Idaho Nonprofit Center, Providence Health Care, WaFd Bank, WSECU, United Ways of the Pacific Northwest	Multnomah County Preschool for All program (qualification standard); Worksource Center Oregon (scholarship awards and to support service needs); Office of Forecasting, Research and Analysis for the State of Oregon (tax model impacts); Portland Development Commission ("prosperous households" measure)

Appendix:

—

B: Decision-Making Framework for Type of Discount







A decision-making framework was developed to help evaluate the options included in this report with regard to the type(s) of benefits to provide, the method of enrollment, and the selection of income criteria. The following options were evaluated:

- Percentage discount
- Credit for a specific number of free trips per month
- Monthly credit
- Fixed discount

For each option, 11 metrics were evaluated at a high level, and each of the 11 metrics was assigned a percentage weight, with the weights adding up to 100%. This allows the decision-making framework to generate a score for each option. The metrics and weights are shown in **Table B-1**.

Table B-1. Framework Metrics and Percentages

Metric	Weight
User benefit:	**55%**
The net monetary benefit per household for highway users experiencing low incomes	5%
The decrease in how regressive tolls are for highway users experiencing low incomes (tolls are regressive if everyone pays the same—those with lower incomes spend a higher percentage of their income on a fixed cost)	10%
Encouraging the free or very low cost availability of a reliable trip for infrequent high-value trips, such as medical or childcare	20%
The increase in the share of time savings accruing to highway users experiencing low incomes	10%
Lessening the burden to highway users experiencing low incomes due to account minimums and automatic reloading events	10%
Program cost:	**20%**
Reduction in total toll payments as a result of the program	10%
Cost of program implementation (excl. toll impact and incl. temporary or permanent staff needs for enrollment)	5%
Ease of program implementation for implementing agency(s)	5%
Operational impact:	**10%**
Operational impact, including eroding travel time and environmental benefits of pricing	10%
Other feasibility:	**15%**
Easily explained to decision-making stakeholders and eventual program participants	10%
Are the stakeholders (legislature, implementing agencies, etc.) willing to support this option?	5%

The framework is designed to allow iteration based on feedback from stakeholders and outreach on the importance of different metrics, as well as the score of each option on each metric. Some high-level ideas that drove the initially selected scores include:

- It is anticipated that self-certification would increase enrollment in the program.
- People experiencing low incomes have diverse travel needs, and their commute trips tend to be more broadly distributed at all hours of day, as opposed to being confined to the peaks.
- A credit or free-trips option (as opposed to a percentage discount) diminishes the burden of credit or debit card requirements, minimum account balances, and automatic reloading events.
- A multi-tier eligibility threshold makes tolling less regressive, but it requires additional explanation, is harder for program users to understand, and is costlier to implement. Stakeholders have emphasized the benefits of both options: that simplicity is critical, but as is acknowledging the different travel and budget needs of people experiencing very low incomes as opposed to people experiencing moderately low incomes.
- Given the early stage of the Oregon Toll Program, all discount options appear equally feasible from a tolling back-office perspective. Self-certification is much simpler for the implementing agency than other verification options.
- Percentage discounts and free trips incentivize traveling the in peak periods, whereas free trips and fixed discounts incentivize traveling in off-peak periods and as such have lower operational impacts, but also less impact on making the time-saving distribution more equitable.
- Percentage discounts are easiest to understand and track, for program participants, but have other disadvantages.
- Stakeholders have been broadly supportive of percentage discounts, credits, and a fixed number of free trips.

- The results of the framework are shown in full in **Figure B-1** and indicate that:
  - » Providing a recurring credit or a recurring number of free trips provides the greatest combined value, followed by a percentage discount.
  - » Self-certification on balance is more effective than actively verifying income on enrollment.
  - » Both one-tier and multi-tier options work well, with a slight edge to multi-tier program versions.

Figure B-1. Framework Results

		Weight--->	100%	5%	10%	20%	10%	10%	55%	10%	5%	5%	20%	10%	10%	5%	15%
Discount Option	**Enrollment**	**Tiered**	**Total**	**A1**	**A2**	**B1**	**B3**	**D2**	**User Benefit**	**E1**	**E2**	**E3**	**Cost**	**Operational Impact**	**D1**	**F1**	**Other Feasibility**
% Discount	Self-Certification	One	5.0	2	5	2	4	1	2.7	8	8	7	7.8	6.0	10	7	9.0
		Multi	5.3	4	8	3	6	3	4.5	6	8	7	6.8	4.0	7	7	7.0
	Confirmed Eligibility	One	3.6	1	3	1	2	1	1.4	9	3	3	6.0	8.0	5	7	5.7
		Multi	3.7	2	4	2	3	2	2.3	8	2	3	5.3	7.0	4	7	4.7
# Free Trips	Self-Certification	One	6.1	5	5	8	8	6	6.8	5	6	7	5.8	2.0	6	7	6.3
		Multi	6.2	7	8	8	8	8	7.9	3	6	7	4.8	2.0	3	7	4.3
	Confirmed Eligibility	One	4.1	3	3	4	4	3	3.4	8	2	3	5.0	6.0	3	7	4.3
		Multi	4.1	4	4	4	4	4	4.0	7	1	3	4.3	6.0	2	7	3.3
Monthly $ Credit	Self-Certification	One	5.7	6	5	8	6	5	6.4	4	6	7	5.3	4.0	4	7	5.0
		Multi	5.8	8	8	8	6	7	7.5	2	6	7	4.3	4.0	1	7	3.0
	Confirmed Eligibility	One	4.0	3	3	4	3	3	3.2	7	2	3	4.8	7.0	2	7	3.7
		Multi	4.0	4	4	4	3	4	3.7	6	1	3	4.0	7.0	1	7	2.7
Fixed Discount	Self-Certification	One	4.7	2	5	2	2	1	2.4	8	8	7	7.8	8.0	8	4	6.7
		Multi	5.0	4	8	3	4	3	4.2	6	8	7	6.8	6.0	5	4	4.7
	Confirmed Eligibility	One	3.4	1	3	1	1	1	1.2	9	3	3	6.0	9.0	4	4	4.0
		Multi	3.5	2	4	2	2	2	2.1	8	2	3	5.3	8.0	3	4	**3.0**

Urban Mobility
STRATEGY

Oregon
Department
of Transportation

IBR Draft SEIS - RECORD #3598 DETAIL

First Name :	Sharon
Last Name :	Thompson
Attachments :	DSEIS_3598_Thompson_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #3598 DETAIL

Submission Date : 11/18/2024
First Name : Sharon
Last Name : Thompson
Business/Organization/Agency :

Submission Input :

First Name:
Sharon

Last Name:
Thompson

Business or Organization:
[redacted]

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Hayden Island Issues

Comment:
Having lived thru a small bridge repair (Camas RR Bridge mid 2000s) I am here to say the noise from the pile

driver was really unbearable AND this was a SMALL project. We have been promised noise, dust AND vibration mitigation. NOT told exactly what this would be and how it would work. I would hazard to guess no one really knows.
The design is faulty the price and funding not all over the place. This project needs to be referred on SO many levels. Before it becomes forever known.as GREG JOHNSON'S BOONDOGGLE BRIDGE

JCA comment #: 943

IBR Draft SEIS - RECORD #3599 DETAIL

First Name :	Gary
Last Name :	Clark
Attachments :	DSEIS_3599_Clark_Original.pdf (630 kb) Say-No-to-the-IBRP-3.jpg (424 kb)

IBR Draft SEIS - RECORD #3599 DETAIL

Submission Date : 11/18/2024
First Name : Gary
Last Name : Clark
Business/Organization/Agency :

Submission Input :

First Name:
Gary

Last Name:
Clark

Business or Organization:
Hayden Island Community Safety Initiative

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
I'm definitely against the bridge designs put forward by the IRBP! The IBRP 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. The IBR is an area where ground liquefaction is "expected" during a major earthquake. Liquefaction is a major threat to any bridge, must less a monster bridge the IBRP is proposing.

Attachment (maximum one):
Say-No-to-the-IBRP-3.jpg

JCA comment #: 944

IBR Draft SEIS - RECORD #3600 DETAIL

First Name :	Clare
Last Name :	Carpenter
Attachments :	DSEIS_3600_Carpenter_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #3600 DETAIL

Submission Date : 11/18/2024
First Name : Clare
Last Name : Carpenter
Business/Organization/Agency :

Submission Input :

First Name:
Clare

Last Name:
Carpenter

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
I'm a resident of North Portland and use the Interstate Bridge frequently. I'm alarmed at the idea of creating more lanes for passenger vehicle traffic at the expense of more active transportation accommodation. We cannot continue to build for more traffic, but we should instead create more accessibility for walkable and rollable transport, along with mass transit. Oregon and Washington deserves an alternative to more air and water pollution.

JCA comment #: 942

IBR Draft SEIS - RECORD #3601 DETAIL

First Name :	Jeff
Last Name :	Lesh
Attachments :	DSEIS_3601_Lesh_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #3601 DETAIL

Submission Date : 11/18/2024
First Name : Jeff
Last Name : Lesh
Business/Organization/Agency :

Submission Input :

First Name:
Jeff

Last Name:
Lesh

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
Please bridge replacement, transit enhancements, and active transportation are the most important elements of the project. The mega project you are proposing is bloated and a smaller streamlined project focused on the above priorities (and not adding auxiliary lanes and freeway expansion) will be more economical and serve the regions goals better.

JCA comment #: 941

IBR Draft SEIS - RECORD #3602 DETAIL

First Name :	Emmett
Last Name :	Finneran
Attachments :	DSEIS_3602_Finneran_Original.pdf (6 kb)

IBR Draft SEIS - RECORD #3602 DETAIL

Submission Date : 11/18/2024
First Name : Emmett
Last Name : Finneran
Business/Organization/Agency :

Submission Input :

First Name:
Emmett

Last Name:
Finneran

Email:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
I support the positions outlined by No More Freeways and the Just Crossing Alliance.

JCA comment #: 940

IBR Draft SEIS - RECORD #3603 DETAIL

First Name :	Clare
Last Name :	Baxter
Attachments :	DSEIS_3603_Baxter_Original.pdf (213 kb) Comments_on_Cork_Screw_Ramps_40.pdf (211 kb)

IBR Draft SEIS - RECORD #3603 DETAIL

Submission Date :	11/19/2024
First Name :	Clare
Last Name :	Baxter
Business/Organization/Agency :	
Attachments :	Comments on Cork Screw Ramps 40.pdf (211 kb)

Submission Input :

Draft SEIS public comment - Cork Screw Ramps

Clare Baxter
Production Management
[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.

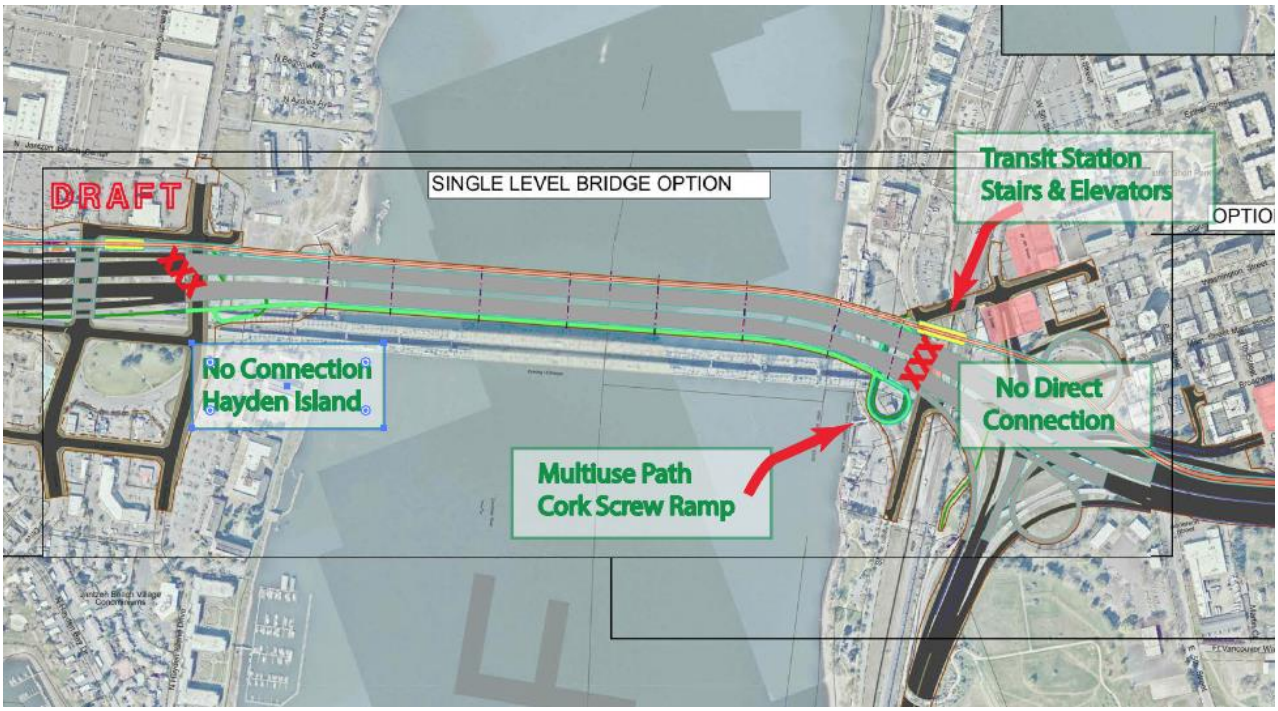
The multiuse path is built on the north bound main bridge span. The end point of the multiuse path on the Vancouver shoreline is approximately 100' in elevation above the ground and is access by a cork screw ramp of approx. ½ mile in length.

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
Clare Baxter
[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.

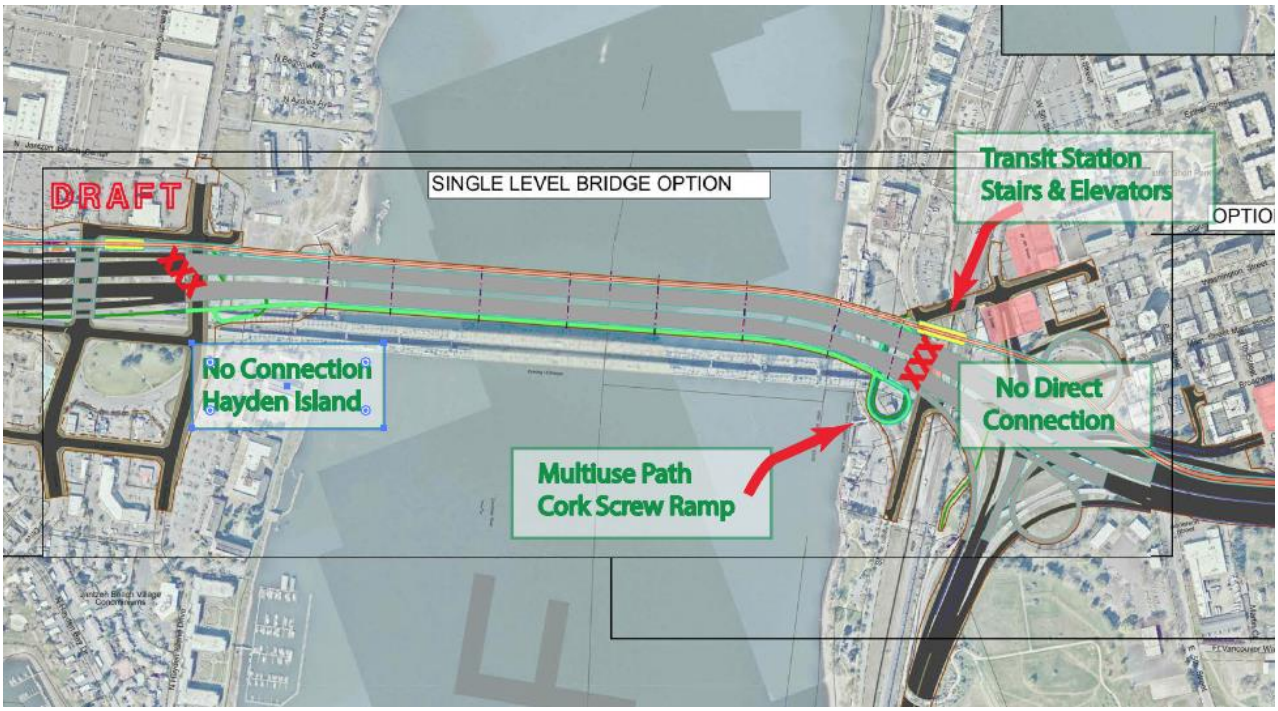
The multiuse path is built on the north bound main bridge span. The end point of the multiuse path on the Vancouver shoreline is approximately 100' in elevation above the ground and is access by a cork screw ramp of approx. ½ mile in length.

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
Clare Baxter
baxter.clare@icloud.com

IBR Draft SEIS - RECORD #3604 DETAIL

First Name :	Kelly
Last Name :	Peterson
Attachments :	DSEIS_3604_Peterson_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #3604 DETAIL

Submission Date : 11/18/2024
First Name : Kelly
Last Name : Peterson
Business/Organization/Agency :

Submission Input :

First Name:
Kelly

Last Name:
Peterson

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
For health and life of people and planet we need to rethink expanding the I5 bridge for cars. This outdated approach to transportation is killing us. We need more investments in public transit. Any car-centered approach should at a minimum include a toll.

JCA comment #: 984

IBR Draft SEIS - RECORD #3606 DETAIL

First Name :	Rick
Last Name :	Bauer
Attachments :	DSEIS_3606_Bauer_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #3606 DETAIL

Submission Date :	11/19/2024
First Name :	Rick
Last Name :	Bauer
Business/Organization/Agency :	

Submission Input :

People’s can’t afford the tolls. Nobody wants the tolls. It’s that simple!!!

Sent from my iPhone

IBR Draft SEIS - RECORD #3609 DETAIL

First Name :	Brian
Last Name :	Gillespie
Attachments :	DSEIS_3609_Gillespie_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #3609 DETAIL

Submission Date : 11/18/2024
First Name : Brian
Last Name : Gillespie
Business/Organization/Agency :

Submission Input :

First Name:
Brian

Last Name:
Gillespie

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Climate Change

Comment:
The bridge replacement should be limited to only replacing the bridge. The current project has ballooned in scope and is an unmitigated climate disaster that will induce more VMT, causing more GHG emissions. It is imperitive that we go bad to basics, fix the bridge, add support rail and non-car uses and leave it at that

JCA comment #: 982

IBR Draft SEIS - RECORD #3612 DETAIL

First Name :	jeffrey
Last Name :	Lang
Attachments :	DSEIS_3612_Lang_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #3612 DETAIL

Submission Date : 11/18/2024
First Name : jeffrey
Last Name : Lang
Business/Organization/Agency :

Submission Input :

First Name:
jeffrey

Last Name:
Lang

Business or Organization:
Secretary to the Board of William Temple House

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
IBR-Proposed Design
What a great opportunity for citizens and tourists of Oregon/Washington to finally have a beautiful, safe and efficient way to bike or walk between our two states. As a walker and biker I marvel at the world class experience of alighting over the mighty Columbia River. Done properly this Pathway will be recognized internationally. Commuters, recreational users and folks seeking connections to larger bike/pedestrian

pathways, like the 40 mile Loop in Oregon will finally have this gateway, which till recently was only a far-off dream.
In Current Proposed Design I feel there is a conflict between Bike and Freight movement.* We need a clearer seperation of Bike Path and Freight. * The MLK under crossing is confusing for bikers and difficult for pedestrians to navigate.

JCA comment #: 980

IBR Draft SEIS - RECORD #3613 DETAIL

First Name :	Sharon
Last Name :	Thompson
Attachments :	DSEIS_3613_Tompson_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #3613 DETAIL

Submission Date : 11/18/2024
First Name : Sharon
Last Name : Thompson
Business/Organization/Agency :

Submission Input :

First Name:
Sharon

Last Name:
Thompson

Business or Organization:
Hayden Island Resident

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Hayden Island Issues

Comment:
TOLLING

I would like to bring to Mr Johnson's attention that many of the people who live on Hayden Island do the majority of their grocery shopping, banking (you can still find an open branch) and other appointments, business and etc in Vancouver.

A large number of these folks live in the Manufactured Home Community on fixed incomes.

While it may seem plausible to someone who will receive a Government funded Pension to say "you use it you pay for it" those whose only income TODAY NOVEMBER 18 2024is a Social Security check (that already doesn't cover expenses) it smacks os arrogance and a disconnect to reality on Hayden Island. WE DO NEED TOLL EXEMPTION. When you budget one tank of gas per month you need to do business at the shortest distance. For Hayden Island Residents that is Clark County..

JCA comment #: 979

IBR Draft SEIS - RECORD #3615 DETAIL

First Name :	Kent
Last Name :	Wu
Attachments :	DSEIS_3615_Wu_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #3615 DETAIL

Submission Date : 11/18/2024
First Name : Kent
Last Name : Wu
Business/Organization/Agency :

Submission Input :

First Name:
Kent

Last Name:
Wu

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
Please right size the bridge and consider induced demand and the impact on sprawling land use, actual congestion, and green house gas emissions and embodied carbon of over building unnecessary lanes. Prioritize transit and active transportation as they are both much less envirnomental and financially impactful than subsidizing car traffic to govt and taxpayers. Also please consider tolling the bridge as construction for an autocentric bridge should not further burden our state budget with debt and other funding priorities like schools. Better connections of transit and active use need to be prioritized. The current design on the Washington side doesn't make any sense and is not a multi-modal solution. Perhaps transit and active use portion bridge built first, the bridge could also be available for emergency vehicles if needed.

JCA comment #: 978

IBR Draft SEIS - RECORD #3617 DETAIL

First Name :	David
Last Name :	Sweet
Attachments :	DSEIS_3617_Sweet_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #3617 DETAIL

Submission Date : 11/18/2024
First Name : David
Last Name : Sweet
Business/Organization/Agency :

Submission Input :

First Name:
David

Last Name:
Sweet

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Induced Demand

Comment:
Interstate Bridge Replacement is a misnomer. I wish it was just a bridge replacement. It's a five-mile long freeway expansion with a new bridge in the middle of it. Using the aging bridge as an excuse, the engineers at ODOT have done exactly what they always seem to do: responded to traffic congestion with many more lanes that will only encourage more driving until the highway is more congested than before. The vast scope and vaster cost of this project is not justified by the need for a seismic upgrade. My grandchildren's children will be

paying for this long after I'm gone. And they'll be saddled with poor roads and transit because of all the funds going to debt service.

It need not be this way. We could build a more modest bridge with transit lanes and walking/biking paths without the extensive freeway expansion. Or we could do what the late Jim Howell suggested years ago. Do a seismic upgrade to the existing bridges and build a new connection between Portland and Vancouver for local traffic, MAX, bikes and pedestrians. This would get the Washington sales tax avoiders off the freeway as well as local commuters, and ease the freeway congestion. It would solve the problem rather than creating new ones. Keep it simple and serve the future.

JCA comment #: 977

IBR Draft SEIS - RECORD #3618 DETAIL

First Name :	Bradley
Last Name :	Bondy
Attachments :	DSEIS_3618_Bondy_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #3618 DETAIL

Submission Date : 11/18/2024
First Name : Bradley
Last Name : Bondy
Business/Organization/Agency :

Submission Input :

First Name:
Bradley

Last Name:
Bondy

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
An immersed tunnel option, which has far less negative noise and Sightline impacts to Hayden Island and Downtown Vancouver was ruled out based on a false evaluation. This evaluation massively overestimated the amount of dredging that would be required, and has been shown to be flawed by licensed civil engineers.

Our peer region, Vancouver British Columbia, has just recently constructed another immersed tube tunnel under the Fraser River, and it is what we should pursue for this project.

JCA comment #: 976

IBR Draft SEIS - RECORD #3620 DETAIL

First Name :	Mark
Last Name :	Brunson
Attachments :	DSEIS_3620_Brunson_Original.pdf (6 kb)

IBR Draft SEIS - RECORD #3620 DETAIL

Submission Date : 11/18/2024
First Name : Mark
Last Name : Brunson
Business/Organization/Agency :

Submission Input :

First Name:
Mark

Last Name:
Brunson

Email:
[redacted]

US States:
[redacted]

Topic Area:
Transportation

Comment:
WA and OR both claim to have commitments towards sustainability and decreasing greenhouse gases and other pollution. However, our states are collaborating to transform a bridge replacement into a major highway expansion. This is inconsistent with any pledge to reduce our transportation system's impact on the climate and the health of nearby communities. The project needs to focus on bridge reconstruction and a major improvement for people traveling by transit, walking, and biking between our states.

JCA comment #: 975

IBR Draft SEIS - RECORD #3622 DETAIL

First Name :	Mary
Last Name :	Hilgendorf
Attachments :	DSEIS_3622_Hilgendorf_Original.pdf (2 kb)

IBR Draft SEIS - RECORD #3622 DETAIL

Submission Date : 11/19/2024
First Name : Mary
Last Name : Hilgendorf
Business/Organization/Agency :

Submission Input :

This I-5 interstate bridge project raises many valid concerns for local citizens whom it affects the most.

*The almost $2-almost $5 toll for cars.
*twice the toll for trucks
* light rail which majority of citizens do not want for multiple reasons
*The pedestrian and bike access is good.
* The inability of this bridge design to allow larger vessels to have access under the bridge.
* Only a 5 minute commute time improvement ???
* The cost of the bridge

Yes, the bridge does need to be replaced. But this design should be put to a vote of the public. Matter of fact, it would be nice to have an option that doesn't have light rail. Does have pedestrian and bike access. With NO vehicle tolls. And Is a beautiful bridge to view from the waterfront. Instead of an LA freeway. And with the ability to allow large vessels to go up the Columbia River. I do believe we have the ability and technology to design and build such a bridge. Maybe there should be a design contest.

Writing the new US administration about this project would be good. Where are the millions of $ we've been told for decades are going to our bridge construction across the country. American Tax payers should not have a toll on the I-5 bridge.

I hope more citizens are made aware and will write the government about their concerns and opinions.

Respectfully

Mary Hilgendorf.

Sent from my iPhone

IBR Draft SEIS - RECORD #3624 DETAIL

First Name :	Amira
Last Name :	Makansi
Attachments :	DSEIS_3624_Makansi_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #3624 DETAIL

Submission Date : 11/18/2024
First Name : Amira
Last Name : Makansi
Business/Organization/Agency :

Submission Input :

First Name:
Amira

Last Name:
Makansi

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
I do not support a bridge freeway expansion in Portland. Studies have shown that within five years after construction, every single highway expansion project has already exceeded its anticipated capacity and has actually created MORE traffic, not less. Whether five lanes or eight, adding more highway transportation is not the solution. Please invest this money in sustainable travel options such as metro, electrified rail, buses, or trams/trolleys. The last thing we need for sustainable cities and a liveable future is more cars on the road.

JCA comment #: 991

IBR Draft SEIS - RECORD #3625 DETAIL

First Name :	Thom
Last Name :	Stone
Attachments :	DSEIS_3625_Stone_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #3625 DETAIL

Submission Date : 11/18/2024
First Name : Thom
Last Name : Stone
Business/Organization/Agency :

Submission Input :

First Name:
Thom

Last Name:
Stone

Business or Organization:
Portland DSA

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
Hi,

I want to take this opportunity to echo Portland DSA's opposition to building this exorbitant waste of tax dollars.

For one thing, it is unnecessary as the amount of traffic has not changed much over the years, certainly not enough to warrant a project of this scale.

I'm deeply concerned by the possibility that this will go through, not only because of the vast amount of people who will be displaced in order to make room but also the massive carbon footprint this will leave on the environment.

Please consider these concerns as well as everyone else's as this affects all of us.

Regards,
Thom

JCA comment #: 990

IBR Draft SEIS - RECORD #3627 DETAIL

First Name :	Gary
Last Name :	Clark
Attachments :	Say-No-to-the-IBRP-4.jpg (424 kb)

IBR Draft SEIS - RECORD #3630 DETAIL

First Name :	Michael
Last Name :	Espinoza
Attachments :	DSEIS-3630_Espinoza_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #3630 DETAIL

Submission Date : 11/18/2024
First Name : Michael
Last Name : Espinoza
Business/Organization/Agency :

Submission Input :

First Name:
Michael

Last Name:
Espinoza

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Induced Demand

Comment:
Hello, I'm very concerned about us overbuilding private automobile infrastructure and inducing more demand. As a society we are better off moving towards shared and active modes of travel for climate and health benefits. How can this bridge project help us achieve a mobility future that gives us freedom from the car? I recommend prioritizing lanes for light rail/busses, cyclists, walkers, some freight, and very limited for private automobiles.

Thanks, Michael

JCA comment #: 987

IBR Draft SEIS - RECORD #3632 DETAIL

First Name :	MARTIN
Last Name :	SLAPIKAS
Attachments :	DSEIS-3632_Slapikas_Original.pdf (9 kb)

IBR Draft SEIS - RECORD #3632 DETAIL

Submission Date : 11/18/2024
First Name : MARTIN
Last Name : SLAPIKAS
Business/Organization/Agency :

Submission Input :

First Name:
MARTIN

Last Name:
SLAPIKAS

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Hazardous Materials

Comment:
A econd of eight previously submitted concerns of Hayden Island , recently REMEDIATED titled, "Concerns Regarding the Current I-5 Bridge Replacement Project (IBRP)
Remediated 2024-07-04
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 PSU 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.

Should the expected Cascadia Subduction Zone Earthquake erupt, our Island residents and visitors might survive the CSZ, Mag 8-9, but would wouuld be subject to poisonous gases and toxic fumes.

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.

FN. Institute For Sustainable Solutions, Portland State University, 118 pages, October 2023 https://multco-web7-psh-files-usw2.s3-us-west-2.amazonaws.com/s3fs-public/FOUO Report for Multnomah County from ISS, Risk of Earthquake-Induced Hazardous Materials Releases 10-11-2023.pdf

JCA comment #: 985

IBR Draft SEIS - RECORD #3634 DETAIL

First Name :	Julie
Last Name :	Nattis
Attachments :	DSEIS-3634_Nattis_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #3634 DETAIL

Submission Date : 11/18/2024
First Name : Julie
Last Name : Nattis
Business/Organization/Agency :

Submission Input :

First Name:
Julie

Last Name:
Nattis

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
For the new bridge, light rail and active transportation paths should be on the same side of the bridge, eliminating the need for the massive loop-de-loop that's in the current plan.

JCA comment #: 996

IBR Draft SEIS - RECORD #3635 DETAIL

First Name :	Mandelyn
Last Name :	Hill
Attachments :	DSEIS-3635_Hill_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #3635 DETAIL

Submission Date : 11/18/2024
First Name : Mandelyn
Last Name : Hill
Business/Organization/Agency :

Submission Input :

First Name:
Mandelyn

Last Name:
Hill

Email:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
As a lifetime Oregonian, I have seen certain infrastructure projects degrading the quality of life for myself and more specifically the most vulnerable and marginal communities in my city. I am writing to request that this bridge be built with the highest environmental and social standards, and at a scale that does not encourage further traffic congestion by expanding the project beyond what is essential. We do not need a freeway expansion. We do need public transportation prioritized, witch special accommodations for local low income and vulnerable people such as toll discounts.

Finally, PLEASE, do your due diligence to ENSURE that this new bridge will be seismically secure, as this is a rare and vital opportunity to provide safe evacuation routes after the Cascadia Subduction Zone earthquake eventually returns.

Thank you for your consideration.

JCA comment #: 995

IBR Draft SEIS - RECORD #3637 DETAIL

First Name :	Alison
Last Name :	Dennis
Attachments :	DSEIS-3637_Dennis_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #3637 DETAIL

Submission Date : 11/18/2024
First Name : Alison
Last Name : Dennis
Business/Organization/Agency :

Submission Input :

First Name:
Alison

Last Name:
Dennis

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
The Insterate Bridge Replacement is a huge investment in the future of our community and needs to include comfortable and accessible active and public transportation options. Looking forward, we must do all we can to minimize emissions, VMT, and infrastructure that divides and isolates rather than unites communities. In order to reach these goals, it is imperative that the IBR include designated public transit lanes and multi-use paths that allow people to comfortably walk, bike or roll across the bridge and board and deboard transit. For optimal

comfort and function, these multi-use paths should be on the outside of the transit lanes, with other automotive lanes on the inside, allowing the transit lanes to form a buffer between the two.

Additionally, the bridge design should be capable of supporting larger and new public transit options, including bus rapid transit and heavy rail. We need more travel options in order to decrease congestion, achieve climate goals and ensure transit equity for all!

JCA comment #: 994

IBR Draft SEIS - RECORD #3639 DETAIL

First Name :	Drew
Last Name :	Millegan
Attachments :	DSEIS-3639_Millegan_Original.pdf (5 kb)

IBR Draft SEIS - RECORD #3639 DETAIL

Submission Date : 11/18/2024
First Name : Drew
Last Name : Millegan
Business/Organization/Agency :

Submission Input :

First Name:
Drew

Last Name:
Millegan

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
As a driver, I was torn on whether I should submit public comment on the bridge project. On the one hand, it is clear that the plans put forward are more or less in their final form. On the other hand, what this bridge plan proposes to do feels like a throwback to the 1970s. By widening the freeway without addressing bottlenecks, it will not solve traffic, and the traffic projections used by ODOT makes wild assumptions on traffic projections that have been shown to be faulty. By attaching multiple interchange reworks, the price tag has ballooned and will likely triple the cost of simply replacing the bridge to modern standards. The one saving grace for traffic - transit lanes for busses and the MAX - appears to be intentionally sandbagged, and I say this as someone who likely would never use the MAX or the bus to cross the river. When I drive across the bridge, I come from points too far away to points even further away for transit to be effective unless I use Amtrak - which has an

entirely separate bridge.

Still, even I am aware that adding lanes does very little to improve driver experience. The fact is that car lanes cannot move that many people at a time, and in an interconnected region such as the Portland-Vancouver metro, the only way to keep people flowing is to better manage a diverse set of travel options in the space that we have. The fact that the highway departments are collectively so obsessed with adding them while they can barely maintain the asphalt they already have is insanity. Even though I drive, I'm aware that every person who takes transit instead of driving is one less car I have to compete with for space. So when I see that MAX stations have been planned to be placed hundreds of feet in the air with the cycling lanes on the wrong side of the highway, I have concerns that the MAX connection will be notably worse at its job of keeping the I-5 bridge from clogging up during rush hour.

All I ask is that the highway departments consider the movement of people in aggregate rather than just us drivers. Otherwise, every time I am forced to cross this god-forsaken bridge I'm worried it will just be jammed up again, even if it is a little wider and a lot more expensive than it had to be.

JCA comment #: 993

IBR Draft SEIS - RECORD #3641 DETAIL

First Name :	John
Last Name :	Mertens
Attachments :	D1_3641_Mertens_20241118_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #3641 DETAIL

Submission Date : 11/18/2024
First Name : John
Last Name : Mertens
Business/Organization/Agency :

Submission Input :

First Name:
John

Last Name:
Mertens

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
This sounds like a 1990s plan for a 2024 and beyond problem. More lanes for personal vehicles is not a practical solution long term.

JCA comment #: 992

IBR Draft SEIS - RECORD #3644 DETAIL

First Name :	Peter
Last Name :	Laciano
Attachments :	D1_3644_Laciano_20241118_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #3644 DETAIL

Submission Date : 11/18/2024
First Name : Peter
Last Name : Laciano
Business/Organization/Agency :

Submission Input :

First Name:
Peter

Last Name:
Laciano

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Climate Change

Comment:
I am writing in opposition to the freeway expansion and interchange construction aspects of the IBR Project. The concept of induced demand is one of the fundamental laws of traffic congestion, and it is undisputed fact that increasing roadway capacity increases cumulative VMT. There is not a single example in history where a roadway has been widened and VMT has decreased, except in conjunction with road pricing. Increasing VMT in the context of the climate crisis, and Metro's stated commitments to reduce transportation emissions to address it, is sheer hypocrisy and a form of climate denial. The IBR Project needs to rightsize the bridge design (no "auxiliary" lanes, a euphemism for highway expansion), remove the interchange construction components, AND build light rail and bike infrastructure to decrease transportation emissions and meet our commitments to addressing climate change.

JCA comment #: 1001

IBR Draft SEIS - RECORD #3645 DETAIL

First Name :	Michael
Last Name :	Andersen
Attachments :	D1_3645_Andersen_20241118_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #3645 DETAIL

Submission Date : 11/18/2024
First Name : Michael
Last Name : Andersen
Business/Organization/Agency :

Submission Input :

First Name:
Michael

Last Name:
Andersen

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
The Interstate Bridge Replacement project should be exactly that: a bridge replacement project. It should focus on improving the crossing, including with public and active transit, and not pour billions of dollars into widening freeways north and south of the river.
Any expansion of auto capacity will activate latent demand, increasing demand for driving; modeling should account for this effect.

JCA comment #: 1000

IBR Draft SEIS - RECORD #3647 DETAIL

First Name :	Ben
Last Name :	Neiman
Attachments :	D1_3647_Neiman_20241118_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #3647 DETAIL

Submission Date : 11/18/2024
First Name : Ben
Last Name : Neiman
Business/Organization/Agency :

Submission Input :

First Name:
Ben

Last Name:
Neiman

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Induced Demand

Comment:
This project is a ridiculous waste of money and resources that cuts against every purported climate goal Washington has. Widening the highways will induce new traffic demand creating more emissions from vehicles and poisoning the surrounding communities with particulates. This has been studied ad nauseam but the IBR team intentionally overlooks it to push through an unnecessary highway expansion. These dollars would be better invested right-sizing the new bridge and expanding transit and biking pedestrian options in a way that isn't just token inclusion to say this project is "multimodal." This project will leave a shameful legacy on Washington and Oregon and while these notes will fall on deaf ears I sincerely hope you read these and understand the damage you are going to our state.

JCA comment #: 999

IBR Draft SEIS - RECORD #3649 DETAIL

First Name :	Rachel
Last Name :	Gilmorr
Attachments :	D1_3649_Gilmorr_20241118_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #3649 DETAIL

Submission Date : 11/18/2024
First Name : Rachel
Last Name : Gilmorr
Business/Organization/Agency :

Submission Input :

First Name:
Rachel

Last Name:
Gilmorr

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
Please prioritize active transportation and bus and light rail in the bridge design. We do not need additional lane space for cars and trucks. Please prioritize making this a bridge that will help reach climate targets, and acknowledge that adding lanes will not reduce congestion but will induce demand.

JCA comment #: 998

IBR Draft SEIS - RECORD #3651 DETAIL

First Name :	Ellen
Last Name :	Bini
Attachments :	D1_3651_Bini_20241118_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #3651 DETAIL

Submission Date : 11/18/2024
First Name : Ellen
Last Name : Bini
Business/Organization/Agency :

Submission Input :

First Name:
Ellen

Last Name:
Bini

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
While the DEIS finds that the Modified LPA can be designed in a way that it minimizes potential environmental impacts--while achieving the project's overarching goal of improving I-5 corridor mobility--I am concerned that the project's benefits are overstated, due to the faulty data that it draws upon. Investigation by City Observatory and Willamette Week shows that the DEIS overestimates baseline (2019) truck traffic by an estimated 69%, and that it also also assumes truck traffic has risen over time, based on data from Metro, which is contradicted by ODOT data showing a reduction in truck traffic since 2005. These inconsistencies make me question one of the LPA's key benefits cited in the DEIS, of daily traffic reductions of 36% (NB) to 70% (SB). To justify a $7 Billion investment such as the IBR, I think we need more clarity on the true benefits, and whether there are other alternatives--such as retrofitting the existing bridge, and adding an additional bridge for transit/bike/pedestrians if the agencies are legitimately concerned about improving those modes. In the neighborhood that I live in in northeast Portland, many of the streets (including my own) are not even paved properly. I suggest we reassess our prospective transportation investments, and how they are meeting community needs. Thank you for your consideration.

JCA comment #: 997

IBR Draft SEIS - RECORD #3655 DETAIL

First Name :	Maris
Last Name :	Zivarts
Attachments :	DSEIS-3655_Zivarts_Original.pdf (4 kb)

IBR Draft SEIS - RECORD #3655 DETAIL

Submission Date : 11/18/2024
First Name : Maris
Last Name : Zivarts
Business/Organization/Agency :

Submission Input :

First Name:
Maris

Last Name:
Zivarts

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
We should not be spending money expanding highway access for cars, but instead should be building transit capacity in a connected network that will give people real options to travel outside of a car.

JCA comment #: 1007

IBR Draft SEIS - RECORD #3657 DETAIL

First Name :	Laura
Last Name :	Mertens
Attachments :	DSEIS-3657_Mertens_Original.pdf (3 kb)

IBR Draft SEIS - RECORD #3657 DETAIL

Submission Date : 11/18/2024
First Name : Laura
Last Name : Mertens
Business/Organization/Agency :

Submission Input :

First Name:
Laura

Last Name:
Mertens

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
Why are we spending this much money on roads. We need less cars in Portland, not more. We need to make Portland a better, safer place to live by lowering emissions and spending money to make roads safer for cyclists and pedestrians.

JCA comment #: 1005

IBR Draft SEIS - RECORD #3659 DETAIL

First Name :	Brian
Last Name :	Larrow
Attachments :	DSEIS-3659_Larrow_Original.pdf (4 kb)

IBR Draft SEIS - RECORD #3659 DETAIL

Submission Date : 11/18/2024
First Name : Brian
Last Name : Larrow
Business/Organization/Agency :

Submission Input :

First Name:
Brian

Last Name:
Larrow

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
This is a once in a century opportunity to do things right. Bike lane and Pedestrian walkway should be on West side with ample clearance from roaring car traffic. Buffered by light rail is best. The Vancouver waterfront should also have an easy bike/ped access so that it becomes a tourist destination not unlike the Golden Gate Bridge. With a reasonable grade/ramps and connection to points south, this could induce commercial activity (rather than just SOV trips).

JCA comment #: 1003

IBR Draft SEIS - RECORD #3661 DETAIL

First Name :	David
Last Name :	Ginsberg
Attachments :	DSEIS-3661_Ginsberg_Original.pdf (3 kb)

IBR Draft SEIS - RECORD #3661 DETAIL

Submission Date : 11/18/2024
First Name : David
Last Name : Ginsberg
Business/Organization/Agency :

Submission Input :

First Name:
David

Last Name:
Ginsberg

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
Build it with a transit lane and the multi use path. Build for the future. Make us proud.

JCA comment #: 1002

IBR Draft SEIS - RECORD #3664 DETAIL

First Name :	Wendie
Last Name :	Siverts
Attachments :	DSEIS-3364_Siverts_Original.pdf (5 kb)

IBR Draft SEIS - RECORD #3664 DETAIL

Submission Date : 11/18/2024
First Name : Wendie
Last Name : Siverts
Business/Organization/Agency :

Submission Input :

First Name:
Wendie

Last Name:
Siverts

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Induced Demand

Comment:
I am concerned about the effect of induced demand. We know adding lanes increases traffic. Studies prove that increasing vehicle capacity ultimately causes worse congestion, more VMT, and more emissions. I have observed this phenomenon myself, as a regular I5 traveler between Portland and Seattle. Every new lane WSDOT builds brings only brief relief, then reverts back to very bad traffic.

Failing to model induced demand for this project is irresponsible and misleading. This approach does not represent reality or the best solution.

Added freeway capacity will induce more cars and cause more slow and stopped traffic in North Portland at the I5-405 split. That's where I live. I5 is at street level, and increased emissions from more cars and more slowdowns with negatively me, my family and the many, many other families in our neighborhood and adjacent neighborhoods.

I do want the Interstate Bridge updated for seismic and light rail — but we can do this without adding lanes! Don't pave over the Pacific Northwest!

JCA comment #: 1016

IBR Draft SEIS - RECORD #3665 DETAIL

First Name :	Matt
Last Name :	Villers
Attachments :	DSEIS-3665_Villers_Original.pdf (4 kb)

IBR Draft SEIS - RECORD #3665 DETAIL

Submission Date : 11/18/2024
First Name : Matt
Last Name : Villers
Business/Organization/Agency :

Submission Input :

First Name:
Matt

Last Name:
Villers

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
This project claims to meet environmental goals through investment in active, public, and multimodal transit, but several key decisions show that these modes are not being taken seriously.

Three notable issues:
- Fixed span should not be considered at all, given the immense height it would force active transit users to climb. Go to the spiral ramp at Concord & Going and climb it 10 times in a row without stopping, then tell me you'd actually use the fixed span version of this bridge. No way. The extreme climb is also bad for drivers in icy conditions, making the proposed bridge *worse* than the current iteration.
- Active transit lanes and LRT lanes being on opposite sides of the bridge makes no sense for multimodal travel. Why make people go nearly a mile out of their way to switch modes?
- Active transit lanes need to be shaded / covered. There is no good excuse not to do this when you're proposing to spend $7-11 Billion dollars mostly on freeway widening that isn't necessary and will make traffic *worse* not better.

JCA comment #: 1015

IBR Draft SEIS - RECORD #3667 DETAIL

First Name :	Thomas
Last Name :	Karwaki
Attachments :	DSEIS-3667_Karwaki_Original.pdf (3 kb)

IBR Draft SEIS - RECORD #3667 DETAIL

Submission Date :	11/19/2024
First Name :	Thomas
Last Name :	Karwaki
Business/Organization/Agency :	University Park Neighborhood Association Board

Submission Input :

The University Park Neighborhood Association Board is concerned that the current configuration of ramps from Vancouver Way to MLK North creates freight-auto conflict and that the impact or SEIS study zone is too small. The UPNA Board also feels that the impact or study zone is too small near the Expo Center and that inadequate analysis of the impacts of rail operations and storage near wetlands has been done, nor has the impact on Expo Center operations been adequately considered.

Thomas KarwakiChair, UPNA

[redacted]

IBR Draft SEIS - RECORD #3669 DETAIL

First Name :	Devin
Last Name :	Ellin
Attachments :	DSEIS-3369_Ellin_Original.pdf (3 kb)

IBR Draft SEIS - RECORD #3669 DETAIL

Submission Date : 11/18/2024
First Name : Devin
Last Name : Ellin
Business/Organization/Agency :

Submission Input :

First Name:
Devin

Last Name:
Ellin

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
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 #: 1013

IBR Draft SEIS - RECORD #3671 DETAIL

First Name :	Anders
Last Name :	Wennstig
Attachments :	DSEIS-3671_Wennstig_Original.pdf (4 kb)

IBR Draft SEIS - RECORD #3671 DETAIL

Submission Date : 11/18/2024
First Name : Anders
Last Name : Wennstig
Business/Organization/Agency :

Submission Input :

First Name:
Anders

Last Name:
Wennstig

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Land Use and Economy

Comment:
The new IBR must be right sized and not be over expansive to induce more demand and create further suburban sprawl. An overbuilt IBR will ruin the character and value of the Vancouver waterfront while facilitating greenfield development, increasing health problems, and accelerating climate change. Do the right thing for the next generation by not doubling down on automobile infrastructure and suburban sprawl. Thank you.

JCA comment #: 1011

IBR Draft SEIS - RECORD #3673 DETAIL

First Name :	Jordan
Last Name :	Lewis
Attachments :	DSEIS-3673_Lewis_Original.pdf (57 kb) Screenshot-2024-11-18-at-19-56-16-Public-Comment-Archive-Just-Crossing-Alliance.png (204 kb)

IBR Draft SEIS - RECORD #3673 DETAIL

Submission Date : 11/18/2024
First Name : Jordan
Last Name : Lewis
Business/Organization/Agency :

Submission Input :

First Name:
Jordan

Last Name:
Lewis

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Induced Demand

Comment:
I have submitted three comments on the DSEIS, but this is the most important one: Induced Demand. The entire Environmental Impact Statement hinges on the assumption that IBR's traffic modeling projections were accurate for the past, present and future; however, they clearly have been inflated in order to justify priors and rubber stamp a project which is stuck in a 20th century mindset. The Columbia River Crossing predicted traffic would grow from 130k trips/weekday to 180k in 2025, which clearly did not happen; in fact, traffic growth stayed

flat entirely! And now IBR wants us to believe that growth will resume and hit 180k by 2045, despite the total lack of growth even since that prediction was made.

Table 2 in the Executive summary suggests that 3% LESS vehicle trips will occur over a bridge two times the width of the existing bridge in 2045. This runs counter to the commonly known principle of induced demand, which states that wider roadways incentivize drivers to take new trips that they would not have previously. And yet, the second additional auxiliary lane adds no additional trips? The analysis is so lazy as to be insulting to our collective intelligence. Induced demand has literally been observed after freeway widening in the past; whether the project calls them auxiliary lanes or not is irrelevant.

The inaccuracy of traffic modeling is not a particular or petty gripe with the project; it is a foundational error on which the entire study is built. It is not possible to accurately predict outcomes on these fundamentally bad assumptions, much less for the public to comment on them. The near-refusal to even mention the concept of induced demand in the DSEIS shows what I call the "Shock-and-Awe" strategy of public outreach, in which planners propose something so flagrantly off-base as to stun the public and make constructive criticism significantly more difficult.

I want to second every comment made by the Just Crossing Alliance; there is not enough evidence to justify a larger road footprint beyond safety shoulders. There is no evidence whatsoever for a second auxiliary lane. The project as-proposed will not alleviate traffic in the corridor, it will only enlarge and shift an existing traffic jam south to the Lombard St exit. The many interchange rebuilds north and south of the river are largely a non-sequitur and should be phased separately from the earthquake-resilient bridge, rather than it being cynically held hostage in exchange for them. Better throughput could be achieved with better metered on-ramps and smart congestion pricing (with exemptions/wealth transfers back to vulnerable groups!) Active transportation and transit should be time-competitive and pleasant alternatives to driving, which the LPA does not currently promise.

The DSEIS is illegitimate until accurate scientific traffic analysis of the No-Build and LPA is done. Do the right thing and listen to the community; if you need to lie to get this project built your way, then you must not have the community's best interest at heart.

Attachment (maximum one):
Screenshot-2024-11-18-at-19-56-16-Public-Comment-Archive-Just-Crossing-Alliance.png

JCA comment #: 1009

IBR Draft SEIS - RECORD #3674 DETAIL

First Name :	Stone
Last Name :	Doggett
Attachments :	DSEIS-3674_Doggett_Original.pdf (4 kb)

IBR Draft SEIS - RECORD #3674 DETAIL

Submission Date : 11/18/2024
First Name : Stone
Last Name : Doggett
Business/Organization/Agency :

Submission Input :

First Name:
Stone

Last Name:
Doggett

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
As the metro region develops, sustainable low-impact transportation that is accessible financially and physically for people of all means and abilities should be prioritized. The IBR should be limited to its current private automobile capacity. The expansive interchanges required for increased personal vehicle traffic should be eliminated. Transit and bicycle pedestrian capacity should be prioritized. The IBR should increase greater population density in the Portland and Vancouver metro area rather than promoting population sprawl and the waste of land and resources. The current expansive overdeveloped interstate plans harm and inhibit smart affordable growth. The bridge is an eyesore, polluting and repulsive for people experienceing downtown Vancouver. The increased personal vehicle traffic from sprawl will deteriorate the quality of life of metro residents and worsen congestion. All of the harms of this project can be reduced by a bridge that promotes residential travel by transit, and micro mobility. This also would benefit freight and non-residential travel.

JCA comment #: 1019

IBR Draft SEIS - RECORD #3676 DETAIL

First Name :	James
Last Name :	Sjulin
Attachments :	DSEIS-3676_Sjulin_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #3676 DETAIL

Submission Date : 11/18/2024
First Name : James
Last Name : Sjulin
Business/Organization/Agency :

Submission Input :

First Name:
James

Last Name:
Sjulin

Business or Organization:
active & equity transportation advocate

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
The IBR Project fails to capitalize on benefits for active transportation related to the height of the proposed

bridge over the Columbia River. Most people living in Vancouver reside in upland areas over 100 feet in elevation or greater. Safe north-south active transportation facilities that are separated from traffic and connect upland areas of Vancouver to the Columbia River and the Vancouver waterfront do not exist. If they did exist, they would involve significant elevation gain / loss. The IBR Project provides a unique opportunity to capitalize on an active transportation route that begins over 100 feet above the Columbia River. Assuming that elevators are placed at the junction with the Vancouver waterfront, the IBR Project could enable many thousands of people in Vancouver to utilize active transportation facilities alongside I-5 to reach the Vancouver waterfront, to return home, or to reach Portland with little elevation loss or gain. Since the IBR project area extends northward to SR 500 (a major east-west state highway) it would be incredibly wasteful to not consider extending active transportation facilities to SR 500 as part of the IBR project. Perhaps more importantly, ignoring this opportunity places people who rely on active transportation for personal mobility at a significant disadvantage.

JCA comment #: 1018

IBR Draft SEIS - RECORD #3678 DETAIL

First Name :	George
Last Name :	Pastushok
Attachments :	DSEIS-3678_Pastushok_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #3678 DETAIL

Submission Date : 11/18/2024
First Name : George
Last Name : Pastushok
Business/Organization/Agency :

Submission Input :

First Name:
George

Last Name:
Pastushok

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
I think the bridge models I've seen so far are incredibly overbuilt with crumbs left for other modes of transportation.
The Columbia river crossing highway project should be a tunnel of no more than two general lanes per direction with an additional bus only lane per direction. Tunnels should also be made for light rail across the river and accommodate for grade separation at each portal. Pedestrian and cycling traffic could use the existing bridge. A tunnel provides a less intrusive expansion of the highway system into downtown Vancouver where the bridge would overshadow the area. The proposed bridge would bring a lot more traffic congestion than the designers anticipate yet will simultaneously not meet projected traffic levels. The highway will attract more drivers and will pull away from potential transit ridership. The proposed bridge will also be a large source of noise and air

pollution that will blight downtown Vancouver for decades.

JCA comment #: 1017

IBR Draft SEIS - RECORD #3680 DETAIL

First Name :	Sharon
Last Name :	Nasset
Attachments :	DSEIS-3680_Nasset_Original.pdf (3 mb) #6 Location, Location, Location.pdf (25 kb) #7 Community meeting by community.JPG (48 kb) #8 Fewer ImpactsThird Bridge Now .pdf (1 mb) #9 REPORT Thanks you so much Sec Buttigieg . Links doc.pdf (2 mb) #10 You're Invited .pdf (15 kb) #11 Tour, Agenda, and Schedulling.BMP (1 mb) #12 Final Steps Truman. final doc.pdf (49 kb) #13 Truman Hobbs Act 33 CFR Part 116 -- Alteration of Unreasonably Obstructive Bridges.pdf (92 kb) Index Attachments and electronic links.pdf (21 kb)

IBR Draft SEIS - RECORD #3680 DETAIL

Submission Date :	11/19/2024
First Name :	Sharon
Last Name :	Nasset
Business/Organization/Agency :	
Attachments :	#6 Location, Location, Location.pdf (25 kb) #8 Fewer ImpactsThird Bridge Now .pdf (1 mb) #9 REPORT Thanks you so much Sec Buttigieg . Links doc.pdf (2 mb) #10 You're Invited .pdf (15 kb) #12 Final Steps Truman. final doc.pdf (49 kb) #13 Truman Hobbs Act 33 CFR Part 116 -- Alteration of Unreasonably Obstructive Bridges.pdf (92 kb) Index Attachments and electronic links.pdf (21 kb)

Submission Input :

[----- Forwarded Message ----- From: Sharonnasset [redacted] To: [redacted] Sent: Friday, November 15, 2024 at 07:21:26 AM PSTSubject: Fw: Electronic copy of Booklet of issues concerning the Columbia River I-5 Bridge project for Secretary Buttigieg 2 of 2 emails

----- Forwarded Message ----- From: Sharonnasset [redacted] To: [redacted] Sent: Wednesday, May 1, 2024 at 12:39:56 PM PDTSubject: Electronic copy of Booklet of issues concerning the Columbia River I-5 Bridge project for Secretary Buttigieg 2 of 2 emails

Location, Location, Location

Transportation is a deep important dive for our end of town. Our location because of the physical attributes and investments made makes us the economic engine of the State. With this opportunity we need to provide the infrastructure that protect the communities that surround our industrial sanctuaries, while supporting the businesses needs. The Mississippi and Columbia Rivers are the only rivers that goes from the ocean into the interior of the U.S. we have deepwater ports and services on the peninsula. The only transcontinental rail in the U.S. BNSF, continental rail to the east coast, Marine Dr Corridor, Columbia Corridor, Lombard HWY-30 By-pass, east-west roads, I-5 freeway, Greeley, Interstate Ave, Albina Ave, Vancouver Ave, MLK Blvd north-south roads. Rivergate, Port of Portland, Northgate, Marine Dr.-Hayden Meadows, and Swan Island employment centers are all in North Portland. This tells us to make sure we pay attention to adding enough infrastructures that is fully multi-modal with more benefits than negative impacts.

We have one bridge the St. Johns' Bridge that goes through the center of town. Only the Marine Dr Corridor is not using our residential streets to reach the land-locked industrial areas. During the 2001 St. Johns' Truck Strategy Hearing at Portland City Council Mayor Katz and the Council Members stated. That the truck problems in St. Johns' and North Portland were inhuman and the only place in State where trucks traffic was allowed to trump community livability. http://www.nobridgetolls.com/nasset/docs/G-5%20%20%20R2011.0328_Third_Bridge_Now_Report_Final-smallerPix(2)%20pg11%20and%2022maps.pdf%20%20f.pdf

Transportation meetings concerning adding capacity across the Columbia River are starting up again in the spring of 2024. When citizens have become fully involved in the process they have made the outcome much better. In 2001 the Portland City Council did not formally Adopt the St. Johns' Truck Strategy. Part of that plan not adopted was to raise the speed limit for trucks, turning Ivanhoe St. into a "truck corridor" with sound walls from the bridge to St. Louis and then west on Lombard St. That did not happen because people wrote letters, made calls, and showed up. With facts and data from original transportation studies, meetings, and letters from elected officials that can be used to clear up misinformation issues. We have to put the puzzle pieces together from former transportation studies it is part of the vigilance of being between two mighty rivers the Willamette and the Columbia.

Here is what has taken place:

> In the 1980's Oregon and Washington Legislators met and accepted the Federal Highway "F" rating Level Of Service (LOS) for the I-5 freeway in north Portland from I-84 to the I-5 bridges.
>
> In 2002 the I-5 Portland /Vancouver Transportation and Trade Partnership EIS recommended capacity across the Columbia River with a Supplemental **or** a Replacement bridge.
>
> In 2005 an independent I-5 bridge(s) inspection had a favorable report including the bridges having more than 60 years of life left.
>
> In 2002 the bridge alternative #8 adjacent to the BNSF rail line was recommended out of the I-5 Partnership EIS for further study not just a replacement bridge.
>
> The Columbia River Crossing EIS during NEPA Scoping identified *RC-14 Bi-State Industrial Corridor freeway adjacent to the BNSF rail line as an alternative. * Third Bridge Now

CRC staff stated in official documents and the video shows CRC staff removing RC-14 without process. CRC staff, not the Project Sponsor Council, CRC Signatory Agencies, legislative oversight committees, or the citizen's advisory CRC Task Force

Letters from the CRC Signatory Agencies and elected official that the NEPA Process was not followed, RC-14 was not studied or vetted.

It is a lie when ODOT – WADOT – and the Bridge Replacement Project say that Third Bridge Now freeway corridor was studied or vetted. It is also a lie to say EIS for the I-5 Partnership stated a Replacement Bridge only. The required NEPA Citizen Comment Period on the "Replacement Bridge Project" will be started soon. They need to hear from you that you want a thorough and honest study, that removing RC-14 was wrong, unfair, and won't be tolerated.

Transportation staff can't say theirs, "staff's idea is best" without comparing it to an alternative at lease as large and with comparable amenities as the only project they are studying. Comparing alternatives side by side to show how or why it works or not should not be "feared" by staff. It needs to be an enjoyable challenge that different alternatives being studied offer.

Metro a CRC Signatory Agency, President and Project Sponsor Council member David Bragdon letter date May 5, 2021 (B)
http://www.nobridgetolls.com/nasset/docs/B%20%20%20%20%209%20%20David%20Bragdon%20May%205.pdf
Metro a CRC Signatory Agency, President and Project Sponsor Council member David Bragdon letter date May 19, 2010 (A)
http://www.nobridgetolls.com/nasset/docs/A%2010%20DavidBragdonCRCReviewMay19.pdf

This link has 2 testimonies from citizen comment and Metro Councilor Brian Newman's comments on the CRC process https://www.youtube.com/watch?v=hBfc4rifWcc&t=332s

Third Bridge Now moving map link
https://www.youtube.com/watch?v=nzaMpNR-Wj8&t=1006s

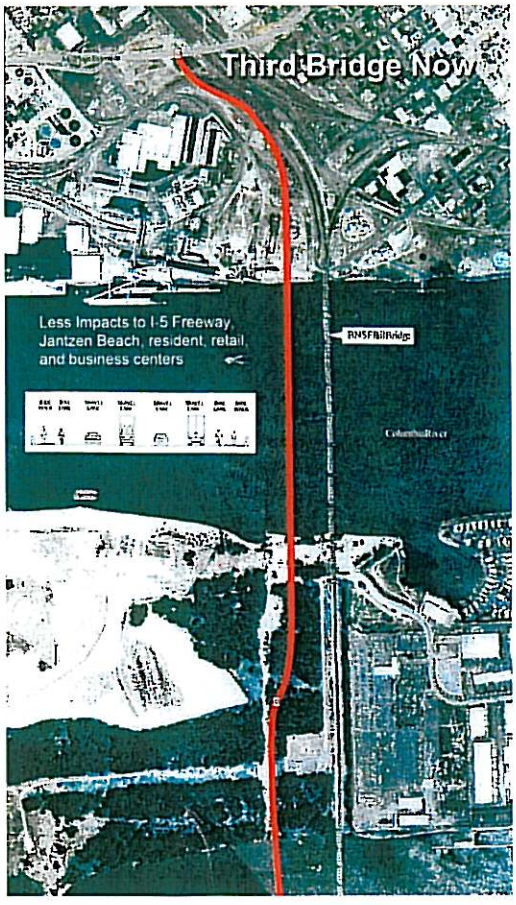
RC-14 is www.ThirdBridgeNow.org

www.thirdbridgenow.com

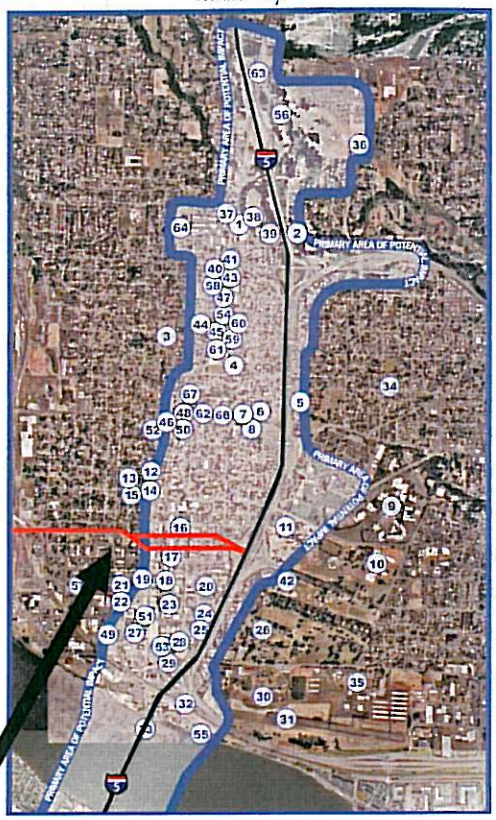


FAR less impact

Potential impact of **new Third Bridge Proposal** is outlined



Washington Neighborhoods resource map — Columbia River CROSSING



Primary Area of Potential Impact

for Columbia River Crossing proposed project:

Oregon Neighborhoods resource map — Columbia River CROSSING



New Third Bridge

The new Third Bridge at the railroad crossing is away from neighborhoods:

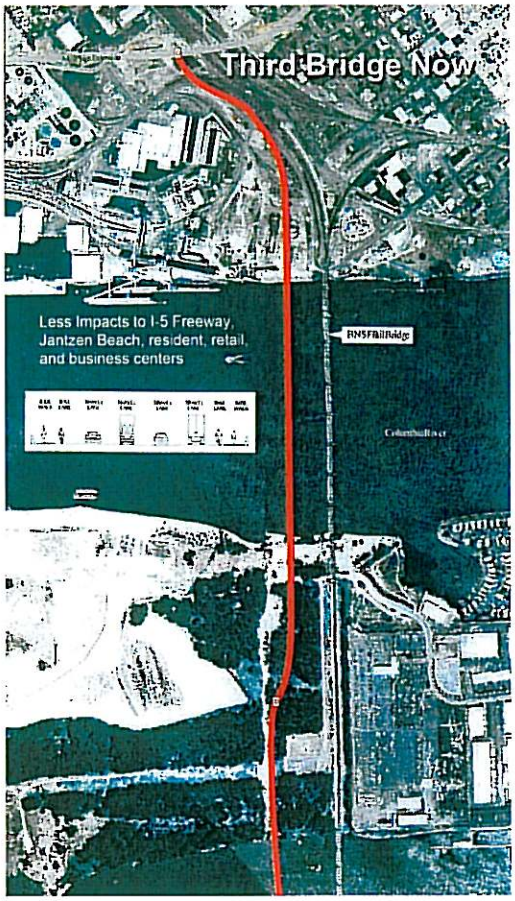


FAR less impact

Potential impact of **new Third Bridge Proposal** is outlined

"Primary Area of Potential Impact" for Columbia River Crossing proposed project:

- Historic Ft, Vancouver
- Approximately one hundred homes
- Jantzen Beach businesses and homes
- High bridge "lands" far away from river
- Very Expensive, costs $2-6 Billion



Washington Neighborhoods resource map

Columbia River CROSSING



Primary Area of Potential Impact

for Columbia River Crossing proposed project:

Oregon Neighborhoods resource map

Columbia River CROSSING



US Secretary of Transportation Pet Buttigieg
US Department of Transportation
12000 New Jersey Ave. SE
Washington DC 20590
United States of America

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Honorable Secretary Buttigieg,

Thanks you so much Secretary Buttigieg for your work on our local transportation issues. I appreciate that as the Transportation Secretary you want your staff to be competent, inclusive, and working for a solution that has the support of the community that the I-5 freeway affects the most. We are looking for a fair, honest, and equal process that shows benefits and impact through construction and operation of alternatives including ours. We have the most at stake and have been begging to be at the table for two–decades now.

Again thank you, Secretary Buttigieg for understanding that there are several large problems and concerns with the former CRC and the current Bridge Replacement Project. The root of the problems is the FHWA and FTA employees who have accepted false, incorrect, misleading and missing data from the CRC since 2005. The personal agendas that the former FHWA Oregon Director David Cox had of adding a "New" I-5 bridge before he retired into "his" portfolio still causes problems today. The official and intelligent handling of infrastructure is for states and federal agencies to work to preserve and maintain when ever-possible vital infrastructure. The 2005 inspection of the I-5 bridges states they have more than 60 years of life left, have no restriction, have had personal care and complement any long-range plans to manage and improve transportation in the I-5 corridor between the two states. Director Cox calls the bridges solid in his emails while demanding the historically protected bridge be removed because he wanted a "new" bridge. This is the exact reason that there is a NEPA Process to stop the overreaching and thugging of FHWA and FTA.

The appropriate response from the FHWA and FTA is please bring your alternatives in and we will thoroughly and equally study the benefits and impacts through construction and operations the data will show the best project to go forward. The best alternative for construction will be found in an inclusive and fair process. Instead Director Cox said, we the community needed to understand he knew what was best and there would not be a process of alternatives it would be his agenda only and we needed to take a back seat to the professional. If and when he accomplished his personal strategy we might have a "chance" with what the community wanted and that we need to accept this is how the process would play out.

The FHWA and FTA accepted false, inaccurate, misleading, missing, from the CRC NEPA EIS Process. The local elected official that sat on oversight committees, boards of Signatory Agencies, and the joint bi-state legislative oversight committees all stated at the time the data was wrong. The FHWA and FTA knew that the data was absolutely false just from comparing it to the previous studies of two years earlier. The elected officials and members of the public brought the information directly to the FHWA and FTA they refused to provide oversight, correct information, check information, or provide verification of accuracy.

The 2010 Independent Review Panel for the CRC stated that everyone associate with the current CRC process should be removed to establish creditability with the process and community. Unfortunately they only removed the project manager. The newest project boasts how many employees and companies from the former CRC project still keep plugging away on the Bridge Replacement Project . CRC had 6 or 8 project manages from 2005 to FOD in 2011.

A little over 2 years ago a staffer from US Senator Wyden office and I had a conversation after a JPACT meeting, about the former CRC and the Bridge Replacement Project having major concerns and complaints

with elected officials, businesses associations, community leaders, and citizens. I stated yes and there was plenty of data to back up what they were saying about the process. The staffer asked me to put together what I had and send it to him with the focus on federal issues and how I thought they should be addressed. It took me a few months and I put together a booklet of over 400 pages of data concerning the CRC and the issues that had been identified previously.

The two-page letter from the local FHWA and FTA oversight employees 9 months later with no answers, pushing back on what had been said, and repeating false statements was the answer to the booklet addressed to Secretary Buttigieg. Either the employees did not read the 400 plus page report sent to the US Secretary of Transportation, they did not understand what they read, or they are corrupt. The root of the problem is FHWA and FTA accepting bad information, refusing to do honest oversight, and a project staff that refused to take direction for the Sponsor Agencies or the oversight committees.

I have been involved in the transportation studies starting as a community forum representative for the North Portland Business Associates and as the transportation chairperson. I authored the West Arterial Alternative # 8 accepted into to the I-5 Portland Vancouver Transportation and Trade Partnership Study EIS, BIA EIS a the "port to port" connection, and the realignment of I-5 and I-84, full interchange at Lombard and Columbia Blvd. Plus the addition of acceleration and deceleration lanes within the Right Of Way between the Rose Quarter and the I-5 bridges on the I-5 freeway. Our community projects were identified during the NEPA Scoping Process for the CRC and became alternatives. The Federal Register for the CRC EIS states alternatives must go through a thorough study showing benefits and impact including construction and operations. Then the alternatives are compared showing the benefits and impacts to make a full informed decision. The NEPA Process was not followed and our projects where removed without being vetted or studied. The FHWA could not let the process continue because our projects at every level Third Bridge Now out preformed Cox's "new" bridge by removing the current bridges. A thorough and honest EIS of our alternatives has been kept from being preformed. Clearly because they have the greatest benefits with the least amount of negative impacts. The CRC staff would have placed our alternatives accurately and in full view to point out the problems and reasons to not continue with our alternatives. The hiding, lying, and removing of our projects is a lot of work. We deserve a full understanding of the benefits and impact of our chosen "locally preferred alternative". There is absolutely no reason to refuse us a process that is fair, honest, equal, and inclusive.

I am starting this summary of the abuse with statements from others who have publicly pointed out the same problems with the CRC, the base project, and the current Bridge Replacement Project.

1.
Portland Metro Council a Signatory Agency of the CRC and a member of the CRC Project Sponsor's Council hearing on the process issues. This link has 2 testimonies from citizen comment and Metro Councilor Brian Newman's comments on the CRC process
https://www.youtube.com/watch?v=hBfc4rifWcc&t=332s

2
Metro a CRC Signatory Agency, President and Project Sponsor Council member David Bragdon letter date May 19, 2010 (A)
http://www.nobridgetolls.com/nasset/docs/A%2010%20DavidBragdonCRCReviewMay19.pdf

3
Metro a CRC Signatory Agency, President and Project Sponsor Council member David Bragdon letter date May 5, 2021 (B)

http://www.nobridgetolls.com/nasset/docs/B%20%20%20%20%209%20%20David%20Bragdon%20May%205.pdf
4

Portland's Mayor, Vancouver's Mayor, Clark County Commissioner and Metro President sent a "polite" letter in January 19, 2010 5 years into the CRC process listing a number of major problems with the process and the need to restore public trust and confidence as well as study other alternatives. The FHWA providing oversight did not inform the Mayors and Commissioners that the Governors were another Co-Agency and not the sole CRC Decision Maker and the CRC Signatory Agencies C-TRAN, RTC, Metro, and TriMet had vote and veto. This reality would have been a total game changer in the CRC process removing leadership, Decision Making, and recommendations from the CRC staff to oversight bodies. C-(1) C-(2) C-(3)
http://www.nobridgetolls.com/nasset/docs/C-(1)%20%20%202008PSC%20Problem%20to%20Gov.pdf
http://www.nobridgetolls.com/nasset/docs/C-(2)%20%20%20CRC%20Sponsor%20Council%20Problems%20%20C-TRAN.pdf
http://www.nobridgetolls.com/nasset/docs/C-(3)%20%20%20Coaliton%20letter%20against%20CRC.pdf

5
A Bridge Too False May 31, 2010 Willamette Week newspaper Portland Oregon (D)
http://www.nobridgetolls.com/nasset/docs/D%20%20%20%20A%20Bridge%20Too%20False.pdf

6
US House of Representative Jamie Herrera Beutler wrote a letter to the C-TRAN Board of Directors a CRC Signatory Agency dated September 25, 2013. "I am concerned that the Board may have been presented with misleading information about a false deadline"- The false information "presented to the Board" an oversight CRC Signatory Agency was from CRC staff with FTA in the many meetings pushing false funding statements. (E)
http://www.nobridgetolls.com/nasset/docs/E%20%20%20US%20Rep%20Herera%20Beutler%20C-TRAN_Board_Letter.pdf

7
The environmental justice committees of the CRC were many. The committees started early in 2005 in Vancouver, Jantzen Beach, and North Portland. The meetings would stop and start and suddenly disband with a new "official" groups of new people to the process. This happened several times with the north Portland no longer having any an environmental group, which is where I-5is located. Then ODOT removed funding from our North Portland environmental justice office, which handled several environmental topics forcing its closure. The Jantzen Beach Environmental Justice Working Group email dated January 18, 2011 stating problems, concerns and upset that they are being "disband" by staff during the EIS NEPA Process before Record Of Decision. * a charge of $50 for paper copy Draft EIS
Metro Council on the CRC DEIS Hearing Environmental Justice leader Ms Jerri Sundval-Williams
www.PortlandDocs.com/CRC/JerriWilliams-070222.wmv (F)
http://www.nobridgetolls.com/nasset/docs/F%20%20CRC%20ejag%20issues%20WG%20disband.pdf

8.
Elected officials during the CRC that made **public comments** that the CRC project had provided false, inaccurate, missing, misleading, false data, conflicting data, and/or information. This list does not include current elected officials who had made the statements then for comfort because they are currently involved in the process and working with staff. This is a broad list of elected officials in several levels of oversight, in both states, and both parties.

US Rep. Jamie Herrera Beutler, Mayors of Vancouver Pollard, Leavitt, Vancouver Council Members Bill Turlay, Jeanne Stewart, Pat Campbell, Portland Mayor Sam Adams, Clark County Commissioners Betty Sue Morris, Steve Stuart, Marc Bolt, Tom Mielke, David Madore, Multnomah County Commissioner Serena Cruz, WA Senators Pam Roach, Bob Morton, Jim Honeyford, Bob McCaslin, Don Benton, WA Rep Bruce Chandler, Vancouver Port Commissioner Jerry Oliver, Oregon Senators Gary George, Larry George, Oregon Representatives Dennis Richardson, Mitch Greenlick, Jim Thompson, Metro President David Bragdon, Councilors Robert Liberty, Bob Stacy.

I know you understand there are major problems with the process. I started with a list of concerns from several directions to provide context to our situations. With this many elected officials and agencies having a range of issues you can imagine how poorly the citizens where treated in the CRC process.

The Situation At Hand

1.
The current I-5 bridges are structurally sound, have no restriction, at least 60 years of life left, can be seismically retro-fit and are formally listed as Federal Historical Resources with protection status. This is from 2005 inspection the 4(f) Historical Resource requirements of the NEPA process have not been followed. Nationals Parks and Recreation Department State Historic Preservation Office's (SHPO) letter March 6, 2007 states protected historical properties have been ignored in the CRC process. It is both Feasible and Prudent to avoid these and other properties on the National Federal Historic Registry. The list includes both of The Columbia River Crossing bridges, Fort Vancouver Reserve properties, Red Cross Building, hospital building (may not be on register), Pearson Airport, and businesses in historic downtown Vancouver, historic neighborhoods, historic homes, and thousands of native artifacts. When it is feasible **or** prudent 4 (f) Historical Resource that are protected and must be avoided. Under 4(f) Historic Resource requirements CRC DOES NOT quality for federal funding because of major demolishing of several federally protected properties. There are alternatives that avoid protected properties! G-(1), http://www.nobridgetolls.com/nasset/docs/G-(1)%20%20SHPOletter_of_concern_about_CRC.pdf G-(2) http://www.nobridgetolls.com/nasset/docs/G-(2)%20%20%20color%20historic%20handouts..pdf, G-(3), http://www.nobridgetolls.com/nasset/docs/G-(3)%20%20%20Baseline%20for%20retaining%20the%20I-5%20bridge%202.pdf G-(4) http://www.nobridgetolls.com/nasset/docs/G-(4)%204%20(F)%20History,%20Feasible%20and%20Prudent%20and%20letters.X%20pdf.pdf

2.
We have several bridges in our state that are not as structurally sound as the I-5 bridges and bridges that are older. To remove available infrastructure because of age goes against current policy of preserve and maintain basic engineering practice. H-(1) http://www.nobridgetolls.com/nasset/wpimages/wpd41e3250_06.png H-(2) http://www.nobridgetolls.com/nasset/docs/H-(2)%20%20%20%20bridge%20ok%20list%20age%20of%20local%20bridges.pdf

3.
The Federal Register /Vol. 70, No. 186 /Tuesday, September 27, 2005 /Notices for the CRC provides project specifics. The purpose of the CRC project is clearly identified as adding capacity across the Columbia River inside the I-5 Corridor. The Federal Register gives the boundaries of I-5 Corridor I-5, I-205, I-84, names all the Co-Agencies, previous studies are to be used including the I-5 Portland Vancouver Transportation and Trade Partnership recommending adding capacity across the Columbia River. CRC staff change the project purpose, location and only accepted Governor and FHWA FTA as oversight.
(I) http://www.nobridgetolls.com/nasset/docs/I%20%20%20%20%20Fed%20Reg%20CRC%20good.pdf

(I-2) http://www.nobridgetolls.com/nasset/docs/I%20-(2)%20%20%20fed%20reg%20with%20boxes%20and%20arrows-2.pdf

4.
Division Administrator David O. Cox FHWA Division Administration Oregon email dated March 22, 2006 "I think our goal should be ….." "So what we are trying to do is to pursue a strategy the will us .." ".. There is no question that both other projects can still stand on their own as necessary and cost effective" "I hope that you can accept (or at least not object to) this strategy." (J)
http://www.nobridgetolls.com/nasset/docs/J.%20%20%20FHWY_DAvid_Cox_letter.%20%20goodpdf.pdf

5.
Division Administrator David O. Cox FHWA Division Administration Oregon second email
Cox's email states that the bridge are sound, can handle the load. Plus it is known that the I-5 bridges can be retro-fit for a once every thousand year event starting as low as $50-million was stated in the I-5 Partnership. The one bridge has already gone through 100 years of earthquakes with no signs of stress, the 1957 bridge show no sign of stress either. So why is Cox's pushing so very hard to remove infrastructure instead of maintain and preserver? 4(f) Historically Protected bridges that have more than 60 years left? It was all about his ego and he wanted a new bridge in his portfolio. **Cox retired years ago and we are still stuck with his lies, faults data, bullying,** The FHWA "dude" providing "oversight" are find with continuing the bullying and **Do not believe in the consent of the governed**.
FHWA Director said " As far as the I-5 bridges… structurally sound means that they have not lost (much) capacity since they're initial construction and are still able to handle the loads. However they were originally construction to what we now consider to be inadequate seismic stands." Therefore the bridges need seismic upgrades to meet the new seismic criteria. (K)
http://www.nobridgetolls.com/nasset/docs/K%20%20%20FHWA%20COX's%20second%20email.pdf

This Is Not Just About Having A Dishonest Process
It Is About The Breaking Of Open Meetings Law, Sunshine Laws,
And Making Written False Statement To State And Federal Agencies.

The Purpose and Needs Statement and other founding documents were not formally Adopted by the Project Sponsor Council or the CRC Signatory Agency for the Columbia River Crossing. Therefore there is no valid process and the federal Record Of Decision needs to be revoked for the Columbia River Crossing.

The Interstate Bridge Replacement Project Environmental Impact Statement currently in process does not have an Adopted Purpose and Needs Statement and other founding documents have not been formally Adopted by a Project Sponsor Council or the Signatory Agency.
Is the Bridge Replacement Project a valid process? How can they be "choosing" alternatives without formally Adopted founding documents to evaluate alternatives?

The Rose Quarter realignment of I-5 and I-84 in Portland Environmental Impact Statement currently taking place does not have a formally Adopted Purposed and Needs Statement and other founding documents. They only have meetings for advisory committees and have not identified the Signatory Agencies and oversight committees. The community advisory committees are still meeting only remotely why? How can they be "choosing" alternatives without formally Adopted founding documents to evaluate alternatives? (L)
http://www.nobridgetolls.com/nasset/docs/L%20%20%20P&N%20missing%20humans%20.pdf

The NEPA Process is all about records and documentation.

Please immediately provide as a Freedom Of Information Act request the formal documentation for the Columbia River Crossing, the Bridge Replacement Project, and the Rose Quarter Project with the following information. The date, time, meeting places, public notices, sign-in sheets, minutes, recordings, and agendas, for the Adoptions of Purpose and Needs Statement, problem definition, and the evaluation measures. This request is being directed to the FHWA and FTA (M)

1.
Open Meeting information
Open Meeting Laws and Freedom of Speech
By Alex Aichinger

A few quotes full article attached
"Open meeting laws, also called sunshine laws, require that, with notable exceptions, most meetings of federal and state government agencies and regulatory bodies be open to the public, along with their decisions and records ".
"Open meeting laws are a relatively new development. They ensure the public's right to access to the internal workings of government at all levels."
"What constitutes a meeting is usually defined by its purpose — to perform public business"
"All such meetings, unless specifically and legally exempted, are presumed to be open to the public, and agencies are required to give advance notice of the date, time, place, and agenda".
"It specifies that regardless of the setting, a meeting is defined by the intent and substance of the communication among public officials. If that intent is to discuss information and views or influence public business or policy, the communication becomes a meeting under the law and the provisions of the open meeting law apply." (AA)
http://www.nobridgetolls.com/nasset/docs/AA%20%20%201%20%20%20Open%20Meeting%20Laws%20and%20Freedom%20of%20Speech%20%20%20The%20First%20Amendment%20Encyclopedia.pdf

2.
Attorney General of Washington Tim Ford
"My informal opinion is that the PRC (as a governing body) is subject to WA state's Open Public Meetings Act. The OPMA requires the meeting of a governing body to be open to the public with limited exceptions as provided in RCW 42.30.110. A governing body shall provide notice of its regular and special meetings. Regular meetings of state agencies are to be filed with the Code Reviser pursuant to RCW 42.30.075. Notice of special meetings shall be provided pursuant to RCW 42.30.080. Any action taken at meetings where an agency fails to comply with the notice requirements of the OPMA shall be null and void. Sharon is alleging that the PRC didn't give proper notice of its meetings where among other actions the PRC approved the "Purpose and Needs" statement." Complete email (BB)
http://www.nobridgetolls.com/nasset/docs/BB%20WA%20%20%20ATG%20Sponor%20Council%20governing%20body%20email.pdf

3.
Washington and Oregon Departments of Transportation letter date November 6, 2006 over steps their authority and deny the Board of Clark Commissioner membership on the CRC. "Project Sponsor Council the Departments of Transportation responsible for the Columbia River Crossing project have decided not to expand the membership of the Project Sponsors Council. The membership of the Project Sponsors Council is reserved for signatories of the Record of Decision and agencies responsible for formally approving the Environmental Impact Statement." This shows CRC Project Sponsor Council knew they where required to follow Open Meetings Law. It shows the Governors and their Departments of Transportation overstepping their power in the CRC Roles and Responsibly of this EIS Process a sole CRC Signatory Agency. They did

not have the power to be the only Decision Maker concerning problems, concerns, or the direction of the CRC EIS process. FHWA was not providing oversight again. (CC)
http://www.nobridgetolls.com/nasset/docs/CC%20%203%20-Sponors%20Council%20formally%20reponsible%20for%20approval%20.pdf

4.
CRC Regional Partners Group Meeting Summary August 18, 2005
This document comments on the Project Sponsor Council several times. Under topics Process for Major Decision Points Project Sponsors Council's role includes "….and formal approval at decision point" and under Daft Purpose and Needs "…in the Problem Definition that will reviewed by the public and adopted by the Project Sponsors Council" The CRC Regional Partners Group and the Project Sponsor Council are both required to follow Open Meetings Law. DD,
http://www.nobridgetolls.com/nasset/docs/DD%20%20%20113%20%20Mtg-2005-08-18-1.pdf
EE
http://www.nobridgetolls.com/nasset/docs/EE%20%20%20%20Project%20Sponsor%20Council%20Members%20.pdf

5.
Project Sponsor Council Meeting Summary November 7, 2005
Acknowledging they must follow Public notice.
Meeting Protocols
"Public notice will be given for meetings where action is scheduled on the project milestones."
"There are five consensus milestones currently anticipated for the project"
Where are the five consensus milestone meetings: Public Notice, location, dates, etc?
"No public notice will be given for other meetings, since they will be working"
All meetings with the intent to influence public policy and deliberation must take place in public according to Open Meetings Laws. Not providing public notices, to all meetings, and stating it as Meeting Protocols is appalling and violation of the Open Meetings Laws. It shows a total disrespect for citizens to have input, listen to deliberations, find out how, and who made what decisions that affect their lives and the future. (FF)
http://www.nobridgetolls.com/nasset/docs/FF%20%20%20Mtg-2005-11-07%20ACKNOWLEDGE%20PUBLIC%20NOTICE%20needed%20for%20action%20items.pdf

6.
Columbia River Crossing Management Roles September 7, 2005 states the FHWA and FTA are members of the CRC Project Sponsor Council. (GG)
http://www.nobridgetolls.com/nasset/docs/GG%20%20%20%20%20FHWA%20was%20on%20Project%20Sponsor%20Council%20responsib%20%20%202005-10-18.pdf

7.
Project Sponsor Council Adopts
Columbia River Crossing Project Management Plan Project Controls Report 1-2 for FHWA
1.4 Purpose and Need
"The Columbia River Crossing project Purpose and Need Statement was approved the Project Sponsor Council in December 2005 and is January 17, 2006." (HH)
http://www.nobridgetolls.com/nasset/docs/HH%20%20CRC%20Purpose%20and%20Needs%20Adopted%20Management%20plan...pdf

8.
Project Sponsor Council Adopts
CRC Memorandum March 15, 2006 TO: Task Force

FROM: Hal Dengerink and Henry Hewitt
SUBJECT: Evaluation Framework COPY: Doug Ficco, Rob DeGraff Task Force members
"The PSC-adopted changes and InterCEP recommendations are summarized in the table on the following pages. For your reference, the complete screening criteria list, as amended by the PSC and InterCEP, is attached, as is a letter from the Washington State Department of Archaeology and Historic Preservation, which describe the agency concerns about the cultural resource criteria." (II)
http://www.nobridgetolls.com/nasset/docs/II%20%20%20PSC%20Adopted%20%20pg55%20EJAG%202006.pdf

9.
Crossing sponsors set closed-door meeting Officials aim to resolve differences over I-5 bridge plan
http://www.columbian.com/news/2010/mar/18/crossing-sponsors-set-closeddoor-meeting/ By Erik Robinson Thursday, March 18, 2010
"The public is not welcome."
"It is not a Project Sponsors Council meeting, and it is not a lunch that is open to the public," said Mandy Putney, a spokeswoman for the bistate Columbia River Crossing project office in Vancouver.
Stuart, who had been planning to join the discussion by teleconference, late Wednesday invited a reporter to listen in.
"It is an important discussion, and the public has a right to be in on it," he said. Two decades in the works, the crossing project has arrived at a crucial juncture."

It is not a Project Sponsors Council meeting, and it is not a lunch that is open to the public," said Mandy Putney, a spokeswoman for the bistate Columbia River Crossing project office in Vancouver. *** clearly stating they knew that Project Sponsor Council meeting were required to be open to the public! (JJ)
http://www.nobridgetolls.com/nasset/docs/JJ%20%20PSC%20CLosed%20door%20meeting%20%20Paula_Hammond_sponsors_set_closed.pdf

10.
FIOA request June 17, 2011
" Please provide all information on the CRC Project Sponsor's Council from 2004 to 2008. Please provide meeting materials, meeting notes, handouts, minutes, and any other documents, including all notes on the CRC Project Sponsor Council. " KK,
http://www.nobridgetolls.com/nasset/docs/KK%20%20%20%20FOIA%20requist%20CRC%20Sponsor.pdf

11.
Flier pointing out the CRC had formal meeting LL
http://www.nobridgetolls.com/nasset/docs/LL%20Project%20Sponsor%20Council%20did%20adopt.pdf

12.
Summary of Open Meetings Law violations (MM)
http://www.nobridgetolls.com/nasset/docs/MM%20%20ABUSE%20OF%20POWER%20Purpose%20and%20Nneede%20not%20Adopted.pdf MM-(2)
http://www.nobridgetolls.com/nasset/docs/MM-(2)%20%20%20may13%20A%20short%20list%20of%20abuses%20and%20why%20outside%20intervention%20%20SENT%E2%80%A6.pdf

13.
FIOA Requested for CRC Project Sponsor Council meetings denied
Sent: Mon, Nov 7, 2011 11:50 am
Subject: PDR D00445 - Nasset - Follow-up Response to Requestor

Michael A. Williams, PE Business Manager Columbia River Crossing

"This Project Sponsors Council met eight times from mid-2005 to January 2007. The Project Sponsors Council's intent and function was advisory only. The Project Sponsors Council was not a governing body for the Columbia River Crossing project. Thus, as an advisory group, the open meetings law requirements of Oregon and Washington did not apply to this group. The CRC has provided all documents in its possession responsive to your requests CRC oversight was, and continues to be, provided by the Oregon and Washington Transportation Commissions, the governors from both states, as well as the Federal Transit Administration and Federal Highway Administration" OVERSIGHT provided by the local FHWA and FTA again pointing to the approval of this process. The also name the Transportation Commissioners of Oregon and Washington providing oversight not a Signatory Agency and have held no local hearing on the CRC process, and identify only the Governors not the other Signatory Agencies reinforcing the falsehood that the Governors are the sole Decision Makers NN
http://www.nobridgetolls.com/nasset/docs/NN%20%20%20CRC%20PSC%20was%20only%20advisory%20email%20project%20director.pdf

14.

Washington Joint Transportation Committee
Columbia River Crossing Oversight Subcommittee
Responses to Questions - Sept. 27, 2012
3. Was there a group called the Project Sponsors Council before 2008?
"A group called the Project Sponsors Council met eight times from 2005 to 2007 to reach consensus on project development. Members included elected officials and regional leaders of the project's sponsoring agencies. This group was formed by WSDOT and ODOT to advise the agencies and made no formal recommendations while it existed." (Open Meeting Laws are on all public meetings were deliberation is taking place not meeting were formal action is taken.) The idea that meetings are "back room only with government employees running the meetings for years, elected officials, current topics and paid for with tax payers dollars, is private?…. And out side of the Freedom Of Information Request the request was denied. The email continues "A second group, also known as the Project Sponsors Council, was appointed by the Washington and Oregon Governors in 2008 to advise on completion of the Final EIS, project design, project timeline, sustainable construction methods, compliance with greenhouse gas emission reduction goals and the financial plan. Their meetings resulted in recommendations to the governors, WSDOT and ODOT, which were implemented." This is a lie to the WA oversight committee that the PSC was a group and in federal document they are stated as the Decision Makers. In 2008 when the newest CRC Project Sponsor Council was restarted they could not affect the process to have alternatives and problems with the process address. They had to focus only on how to continue the flawed LPA. The second Project Sponsor Council was appointed by the Washington and Oregon Governors again they did not have the sole right to install an oversight and Decision Making committee. This is entirely against the NEPA Process to have one body in this case the Executive calling all the shots. The naming of committees as the "Governors'" (property) CRC Citizen Task Force, the "Governors'" CRC Project Sponsor Council, and the "Governors'" Departments of Transportation running the process, providing the information, data, calling all the shot and saying what the Governor "does not does not want to allow." The local FHWA and FTA don't see a problem with any of the total exclusion of regional partners, elected officials, other Signatory Agencies, oversight committee, and the citizens. EE,
http://www.nobridgetolls.com/nasset/docs/EE%20%20%20%20Project%20Sponsor%20Council%20Members%20.pdf OO
http://www.nobridgetolls.com/nasset/docs/EE%20%20%20%20Project%20Sponsor%20Council%20Members%20.pdf OO-(2) http://www.nobridgetolls.com/nasset/docs/OO%20%20%20QA92812.highlight22.pdf

15.

SW WA Regional Transportation Council (RTC) is an oversight CRC Signatory Agency
2/6/08 3:03:40 PM Pacific Standard Time From: dean.lookingbill@rtc.wa.gov
"The group met early on in the CRC Project, but was disbanded some time ago. I am sure there is some record of their meetings but you would need to get that information from the CRC team. They were responsible for all of that." PP
http://www.nobridgetolls.com/nasset/docs/PP%20%20Sponsor%20Council%20disband%20email%20RTC%20CRC%20PSA.pdf

16.
That is right the CRC Project Sponsor Council self disband the entire Council just quit. Publicly claiming they could not work with CRC staff, where not able to affect the process in providing leadership or oversight they stopped meeting. Elected officials that had been appointed by CRC Signatory Agencies in formal hearings walked off the job. The Project Sponsor Council of elected official preformed deliberation on issues that affect the public and are subject to Open Meetings Law even if action wasn't taken. Why do the CRC, WADOT, ODOT, FHWA and FTA who attended the meeting, have the meeting information, notes, and actual audio refuse to make them public? What happen to make appointed elected officials, someone who won an election, just give up and REFUSE to ever met again? The official CRC Decision Makers and oversight committee members of the largest mega project for our area give up their "power" and responsibility. Clark County Commissioner Betty Sue Morris said " it was the worst experience of her life, worst then all her years as a teacher, and all her years in the legislator."
C-TRAN - Board of Directors Meeting DATE : Tuesday, October 11, 2005 TIME : 4:45 p.m.
PLACE: C-TRAN Administrative Facility, 2425 NE 65th Avenue,
Van, WA 98661 (360-696-4494, e-mail: ctran@c-tran.com; Web site: www.c-tran.com)
1.5 STAFF REPORT
1. APPOINTMENT TO COLUMBIA RIVER CROSSING PROJECT SPONSORS COUNCIL, C-TRAN STAFF REPORT #05-032
To appoint a C-TRAN Board of Directors member to the Columbia River Crossing (CRC) Project Sponsors Council (PSC).
ACTION: That the C-TRAN Board of Directors select and appoint a C-TRAN Board Member to the Columbia River Crossing Project Sponsors Council. QQ
http://www.nobridgetolls.com/nasset/docs/QQ%20%20%20Sponsor%20Council%20appointment%20%20CTRAN%20oct_05_agenda.pdf

17.
With no Project Sponsor Council, CRC staff continued making all the decisions which is why the Locally Preferred Alternative was called "staff recommended LPA". The LPA had 138 caveats imposed by the Signatory Agency. There is no record of public hearings to satisfy the caveats or if or how the issues were resolved. RR http://www.nobridgetolls.com/nasset/docs/RR%20%20%20LPA%20138%20caveats.pdf

18.
The Project Sponsor Council refused to Adopt the Purpose and Needs Statement that staff proposed stating it was missing all the language in the I-5 Partnership Problems, Vision, and Values Statement. The lack of community, environment, and inclusiveness plus the pointing towards a specific outcome with the narrowness that did not address the entire I-5 Corridor. The Project Sponsor Council rejected the Evaluation Framework for similar reasons as the Purpose and Needs Statement.
FHWA became involved in the disrupts they sided with the CRC staff and approved the draft Purpose and Needs Statement. "The federal co-lead agencies for this project, Federal Transit Administration (FTA) and Federal Highway Administration (FHWA), **were also instrumental in the development of the project's Purpose and Need.** Appendix A provides further details, describing the agencies this project is working with and the coordination processes with this diverse group." FHWA and FTA took the Purpose and Needs

Statement away from the Project Sponsors Councils the representatives of the CRC Signatory Agencies. THAT IS NOT NORMAL AND IS ILEGAL !!!! VOIDATION OF OPEN MEETINGS LAW AND NEPA REQUIRMENTS. The local FHWA and FTA "fixed" our Purpose and Needs Statement after taking it away from the local official Decision Makers and approved it themselves without any input from anyone else. Again the FHWA and FTA sided against the Project Sponsor Councils recommendations the concerning the scope, the projects new focus on the "new" BIA, instead of the entire I-5 Corridor, non-inclusive language, etc. SS, http://www.nobridgetolls.com/nasset/docs/SS%20Purpose%20and%20Needs%20Statement%20I-5%20Partnerhsip%202002.pdf
L, http://www.nobridgetolls.com/nasset/docs/L%20%20%20P&N%20missing%20humans%20.pdf TT http://www.nobridgetolls.com/nasset/docs/TT%20%20%20CRC%20PurposeandNeedStatement.pdf TT-(2), http://www.nobridgetolls.com/nasset/docs/TT-%20(2)%20%20P&N%20missing%20humans%20.pdf TT-(3) http://www.nobridgetolls.com/nasset/docs/TT-(3)PRC%20Does%20not%20inclued%20Ports%20flier.pdf
TT-(4) http://www.nobridgetolls.com/nasset/docs/TT-(4)%20%20%20CRC%20Project%20Manager%20PUTS%20IN%20WRITING.pdf
TT-(5) http://www.nobridgetolls.com/nasset/docs/TT-(5)%20%20Ports%20no%20in%20Project%20again%20Dec%2024,%202007.pdf
TT-(6) http://www.nobridgetolls.com/nasset/docs/TT-(6)%20%20%20timeline%20Flowchart_12-05-2011-jk-3.pdf TT-(7) http://www.nobridgetolls.com/nasset/docs/TT-(7)%20%20%20order_of_EIS_FED_%20flier%20timeline.pdf
YY
http://www.nobridgetolls.com/nasset/docs/YY%20%20%20%20117%20BCRC%20PSC%20No%20Adopts.pdf YY-(2) http://www.nobridgetolls.com/nasset/docs/YY-(2)%20%20%20110%20%20missing%20infromation%20%20B.pdf
YY-(3), http://www.nobridgetolls.com/nasset/docs/YY-(3)%20%20%20119%20CRCPSC%20my%20experience%20C.pdf

19.
As a represents of the project area Washington State Senator Don Benton wrote a letter to FTA June 3, 2012 asking for oversight of the information concerning transit markets and the Portland light rail alignment. Senator Benton was a Board Member of RTC a CRC Signatory Agency with oversight, on a WA State Legislative oversight committee, and a member WA/OR CRC Joint Legislative Oversight Committee. The letter asking for verification was REFUSED, rejected, rebuffed, and given the "word salad" treatment. Why not yes, happy to show you how much this will help your constituents. Here are the numbers and data you are looking I hope they answer your questions. UU,
http://www.nobridgetolls.com/nasset/docs/UU%20%20%20BENTON%20%20CRC_Letter_to_Rogoff,_Location_concerns,_6,3,12-2.pdf
VV,
http://www.nobridgetolls.com/nasset/docs/VV%20%20Response_letter_from_FTA,_CRC%20Sen%20Benton2.pdf
WW,
http://www.nobridgetolls.com/nasset/docs/WW%20%20Person%20trips%20to%20Clark%20Co%20dis-or%20map.pdf
XX
http://www.nobridgetolls.com/nasset/docs/XX%20%20%20Employment%20center%20light%20rail%20service.pdf

20.
The I-5 Portland Vancouver Transportation and Trade Partnership EIS recommended adding additional capacity across the Columbia River road and rail. Recommendations concerning rail included to have the

BNSF rail bridge alignment with the I-5 barge channel alignment issues addressed. The Truman Hobbs Hearing clearly stated that the problem was caused by the FHWA trying to lessen the lifts on the current I-5 bridges in 1957 by the addition of a barge channel hump that was not aligned with the existing lift on the BNSF rail line. The change in alignment created one of the top ten worst water hazards in the US waterway system. Almost two decades ago when the hearings took place the FHWA was identified as the cause of the problem, and the Benefactor of a new lift that is aligned with the bridge channel. The FHWA has held us hostage so they can whine about a lift on I-5 causing congestion. The pollution, noisy, bridges safety, marine, rail, road, and congestion endured is held up by the FHWA. While when the Willamette River lift was changed took 72 hours decades ago! The FHWA has had money and time yet has not helped elected official, committees, groups, and individuals who have tried to get this issue dealt with. We hit a brick wall with the FHWA they need to pay up and take responsibility. The FHWA has a complete disconnect with having the BNSF bridge alignment taking place independent of the EIS issues of adding capacity across the Columbia River instead they have linked them. Absolutely keeping the lift as a safety issue for leverage in enforcing "FHWA OWN AGENDA". The same FHWA keeps pointing out that one of the ideas of a replacement bridge should happen when documents clearly states a supplemental or replacement bridge. The statement suggesting a possible need for a replacement was before the 2005 report stating the bridges have 60 years of life and are worth between 500,000,000 and a billion dollars. ZZ http://www.nobridgetolls.com/nasset/docs/ZZ%20%20final_recc_at_glance.pdf , ZZZ http://www.nobridgetolls.com/nasset/docs/ZZZ%20%20%20Final%20Steps%20%20Truman.%20%20final%20doc.pdf

The CRC Task Force Member wrote a letter supporting commuter rail the letter dated July 12, 2006 From the CRC Task Force Members to the Governors of Oregon and Washington, OR/WA US Senators and US Representatives.
"The CRC Task Force recommends that such a study be undertaken immediately, focusing on addressing the projected freight and inter-city passenger rail needs." CRC staff refused to study rail service on new tracks finally CRC Task Force Member sent a letter. A study of heavy rail was not done however the two previous studies recommended. The I-5 Partnership echoed what the I-5 Corridor study of 1999 stated about the train tracks in our area are over capacity and we need to study freight and passenger rail on new tracks. Third Bridge Now was accepted in to the NEPA Scoping Process as RC-14 with new heavy rail on double track from Longview WA to the Rose Quarter in Portland with feeder bus system. DDDD http://www.nobridgetolls.com/nasset/docs/DDDD%20%20%20%20Commuter%20rail%20should%20be%20studie.pdf

NEPA Process Not Followed

Thank you for asking us for information explaining our community projects and the alternative freeway bi-state corridor. Our community hosts the ports, several industrial areas, the main event center, the I-5, I-205, I-84 freeways, and several transportation corridors; Columbia Blvd. Corridor, Marine Dr, Sandy Blvd HWY-30, and Lombard Bi-Pass HWY-30. In the 1980 the I-5 freeway through our neighborhoods were rated Level Of Service F with overflow of the I-5 freeway into adjacent neighborhoods deemed unsafe. We are St Johns, North, and Northeast Portland residences and retailers. The I-84 and I-205 freeways are over capacity and send traffic streaming into our neighborhood streets finding any "way" to get around the congestion. We have a lack of infrastructure that removes needed transportation to and from our ports and industrial areas, out of our neighborhoods which business and residents identify as a problem.
In 2000 when a little yellow card came in the mail saying transportation projects are needed in your area and we are looking for citizen input I sent in a list of ideas. Some of the ideas became accepted into the NEPA EIS for the I-5 Portland Vancouver Transportation and Trade Partnership. I became the North Portland Business Association Transportation Chair, I-5 Task Force Community Forum Representative, formed the

Non- Profit Economic Transportation Alliance commonly known ask Third Bridge Now and have held dozens of community meeting in Oregon and Washington on transportation issues. The community meetings to ask what citizens think, want, why, how, and the need for infrastructure. We need a comprehensive plan dealing as a whole and the individual parts of the transportation system that is on our neighborhood streets. Thinking that taking out a solid historic bridge and putting a bridge in the same place, in the same broken system, and all the problems including that fact that the I-5 freeway and bridge are over capacity just disappears. Do not make any sense. 1999 data stated that we have fewer bridges than similarly sized metropolitan do in the US and we needed to add capacity across the Columbia River.

1.
The I-5 Portland/Vancouver Trade Corridor commonly called the I-5 Corridor has specific geographic boundaries. The transportation studies in our region have all been based on the same I-5 Corridor description. The ports, industrial area, rails, and airport are all in one area location mostly along the two rivers. The boundaries are not subjective and the staff handling the former and current processes will state locations are inside and / or outside of the I-5 Corridor knowing they are making false statements. Using those false statements to eliminate alternatives and change the process. Here is the I-5 Portland/Vancouver Trade Corridor EIS study booklet. The study took place before the I-5 Partnership. The map and description on pages 18 and 19 are exactly the same as previous studies and the Federal Register concerning this project study area. AAA, http://www.nobridgetolls.com/nasset/docs/AAA%20I-5%20Corridor%20Studycomplete%20final%20%20%20%20pg.19%20map.pdf
AAA-(2) http://www.nobridgetolls.com/nasset/docs/AAA-(2)%20%20I-5%20Corridor%20Executive%20Summary%20Reportpdf.pdf

2. Versions of the community-supported alignment has been studied as a smaller, shorter alignment in several studies and recommended for further study.
I-5 Portland/Vancouver Trade and Transportation Partnership Booklet BBB,
http://www.nobridgetolls.com/nasset/docs/BBB%20%20%20bia_findings%20complete%203.pdf BBB-(2)
http://www.nobridgetolls.com/nasset/docs/BBB-(2)%20%20I-5%20Partnership%20final%20booklet.pdf
BBB-(3) http://www.nobridgetolls.com/nasset/docs/BBB-(3)%20%20%20BIA%20description%20I-5%20and%20CRC.pdf

Option #8 West Arterial Map (CCC) http://www.nobridgetolls.com/nasset/docs/CCC%20%20%20I-5%20West%20Art%20map%20shows%20exits.pdf
#8 West summary page (DDD)
http://www.nobridgetolls.com/nasset/docs/DDD%20%20%20West%20%20Arterial%20results%20I-5%20Partnership.findingpdf.pdf
I-5 Partnership summary recommendation page (EEE)
http://www.nobridgetolls.com/nasset/docs/EEE%20%20%20final_recc_at_glance.pdf

Bridge Influence Area (BIA) booklet (FFF)
http://www.nobridgetolls.com/nasset/docs/FFF%20%20%20bia_findings%20complete%203.pdf

Option #8 West Arterial BIA map the “port to port” connection (GGG)
http://www.nobridgetolls.com/nasset/docs/GGG%20%20%20Art%20map%20nice.pdf
Option #8 West Arterial I-5 Partnership and BIA map (HHH)
http://www.nobridgetolls.com/nasset/docs/HHH%20%20BIA%20%20%20West%20art%20short%20and%20long%20f.%202pdf.pdf
I-5 Corridor and BIA maps I-5 Partnership (III) http://www.nobridgetolls.com/nasset/docs/III%20I-5%20Partnership%20Corrridor%20and%20%20BIA.pdf

BIA findings on JJJ, http://www.nobridgetolls.com/nasset/docs/JJJ%20%20BIA%20-%20I-5%20Partnereship%20data.pdf
JJJ-(2) http://www.nobridgetolls.com/nasset/docs/JJJ-(2)%20%20%20I-5%20Recomation%20and%20reasons%20-%20I-5%20Partnership%20files%20i-5partnership.021031%20www.i-5partnership.com%20reports%20reccs.highlite%20%20pdf.pdf

SW WA RTC Visioning Corridor 2008 Option # West 4 and 4A Arterial (I-4)
http://www.nobridgetolls.com/nasset/docs/I-4%20RTC%20Vissioning%20corridor%20Study%202008.pdf

CRC Co-Chair Hal Dengerink identifying the importance of the Bridge Influence Area at the CRC Joint Senators' Oversight Committee hearing. Stating that the ports are inside the Bridge Influence Area:
http://www.youtube.com/watch?v=rIEo-jF5WL8&feature=related

Summary of findings from previous studies

I-5 Partnership EIS 2002
Option #8 West Arterial
Arterial
Speed 35 MPH
Lift Yes
Stop lights Yes
Arterial 6-lanes 600-900 per lane
Managed 0-lanes 0
Heavy rail 0-track 0
LOS Capacity 48,000 vehicles daily full upon opening
Alignment length 3-mile

I-5 Partnership EIS BIA 2002
Option #8 West Arterial Short
Arterial
Speed 35 MPH
Lift Yes
Stop lights Yes
Arterial 6-lanes 600-900 per lane
Managed 0-lanes 0
Heavy rail 0-track 0
LOS Capacity 38,000 vehicles daily full upon opening
Alignment length 11/2-mile

SW WA RTC Vissioning Corridor 2008
Option #4 West Arterial Short
Arterial
Speed 35 MPH
Lift Yes
Stop lights Yes
Arterial 4-lanes 600-900 per lane
Managed 0-lanes 0
Heavy rail 0-track 0
LOS Capacity 38,000 – 46,000 vehicles daily full upon opening
Alignment length 11/2-mile

CRC official description of Bridge Influence Area KKK
http://www.nobridgetolls.com/nasset/docs/KKK%20%20%20BIA%20description%20I-5%20and%20CRC.pdf

CRC map showing I-5 Partnership Option #8 West Arterial long and short study map (LLL)
http://www.nobridgetolls.com/nasset/docs/LLL%20%20%20CRC%20I-5%20Partnership%20west%20artlong%20short.pdf

The CRC staff of professionals continually used the maps belonging to Third Bridge Now misrepresenting the alignment. This is the only map that the CRC engineers developed during the process PPP http://www.nobridgetolls.com/nasset/docs/PPP%20%20TBN%20not%20studied.Fin%20%20pdf.pdf
PPP-(2) http://www.nobridgetolls.com/nasset/docs/PPP- http://www.nobridgetolls.com/nasset/docs/PPP-(5)%20%20%20Not%20studied%20Sen%20Benton%20%2012%20letter.%20pdf.pdf2)%20%20%20RTC%20letter%20TBN%20not%20studied.pdf
PPP-(3) http://www.nobridgetolls.com/nasset/docs/PPP-(3)%20%20%20CTRAN%20letter%20about%20TBN.pdf PPP-(4) http://www.nobridgetolls.com/nasset/wpimages/wpbba4a448_06.png PPP-(5) http://www.nobridgetolls.com/nasset/docs/PPP-(5)%20%20%20Not%20studied%20Sen%20Benton%20%2012%20letter.%20pdf.pdf PPP-(7) http://www.nobridgetolls.com/nasset/docs/PPP-(7)%20%20%204th%20Plain%20becoming%20major%20freight.pdf PPP-(8) http://www.nobridgetolls.com/nasset/docs/PPP-(8)%20%20%20%20Steve%20Stuart%20letter%20explaing%20not%20studiedpdf.pdf
PPP-(9) http://www.nobridgetolls.com/nasset/wpimages/wpb351fab2_06.png PPP-(10) http://www.nobridgetolls.com/nasset/docs/PPP-(10)%20%20%20IRP_report.pdf
PPP-(11) http://www.nobridgetolls.com/nasset/docs/PPP-(11)%20Fliers%20%20%20Yes%20a%20different%20location%20is%20what%20we%20need..pdf (12) http://www.nobridgetolls.com/nasset/docs/PPP-(12)%20%20the%20only%20CRC%20map%20of%20RC-14.%20Description%20.2pdf.pdf
ZZZ
http://www.nobridgetolls.com/nasset/docs/ZZZ%20%20%20Final%20Steps%20%20Truman.%20%20final%20doc.pdf

Third Bridge Now Corridor Maps
Location, Alignment, Capacity

These maps belong to Third Bridge Now freeway corridor also know as Bi-State Industrial Corridor. The maps show the freeway attaching to I-5 at Mill Plain in Vancouver, west into the Port of Vancouver across to Jantzen Beach adjacent to the BNSF rail bridge, south through Swan Island, and along Smith and Bybee lakes west to Hwy-30. (AAAA)
http://www.nobridgetolls.com/nasset/docs/AAAA%20%20%20Third%20Bridge%20Orginal%20Maps.pdf
The Bi-State Industrial Corridor (BBBB).
http://www.nobridgetolls.com/nasset/docs/BBBB%20%20Bi.State%20Industrial%20Corridor%20Description.pdf

Description Third Bridge Now full project (EEEE-2) http://www.nobridgetolls.com/nasset/docs/EEEE-(2)%20Third_Bridge_Now_Report_Final-smallerPix(2)(1).pdf
Maps shows our new freeway corridor is fully multi-modal alignment starting at I-5and Mill Plain in Vancouver, crossing into Oregon and going south through Swan Island and west to HWY-30. Transit in commuter rail, buses, feeder buses, bike, and pedestrian. (CCCC, http://www.nobridgetolls.com/nasset/docs/CCCC%20%20%20%20maps%20of%20project%20transit.pdf
CCCC-2, http://www.nobridgetolls.com/nasset/docs/CCCC-2%20%20%20Transit%20maps%20Third%20Bridge%20Maps.pdf

CCCC-3, http://www.nobridgetolls.com/nasset/docs/CCCC-2%20%20%20Transit%20maps%20Third%20Bridge%20Maps.pdf
CCCC-4, http://www.nobridgetolls.com/nasset/docs/CCCC-4%20%20I-5%20Part%20New%20Option4Spead%20rail%20map.pdf
CCCC-5 http://www.nobridgetolls.com/nasset/docs/CCCC-5%20%20%20%20I-5%20Part%20maps%20overview.pdf

Location matters: A bi-pass I-5 freeway attaching to I-5 freeway in Vancouver and in Portland, crossing the Columbia River 1-mile west of the I-5 freeway adjacent to the BNSF rail bridge the "heart of the I-5 Trade and Transportation Corridor" Connects the ports and the majority of the industrial areas of both states with a new freeway bridge and I-5 freeway bi-pass using mostly vacant publicly owned. The location 1-mile west of the airports does not have airspace or marine constraint issues.

As described by CRC A Screening page 75
5.3.4.1 RC-14 New Corridor Crossing "This crossing would accommodate freight trains, trucks, autos, bus transit, bikes/pedestrians and potentially light rail". A-6-(1) http://www.nobridgetolls.com/nasset/docs/A-6-(1)%20%20%20CRC%20decription%20of%20RC-14.pdf
BBB http://www.nobridgetolls.com/nasset/docs/BBB%20%20%20bia_findings%20complete%203.pdf

Third Bridge Now / Bi-State Industrial Corridor a new fully multi-modal freeway corridor with new heavy rail tracks from Longview WA, vehicles, buses, bikes and pedestrian capacity EEEE-(1), http://www.nobridgetolls.com/nasset/docs/EEEE-(1)%20%20Third%20Bridge%20Now%20I-305%20interchanges%20.pdf
EEEE-(2), http://www.nobridgetolls.com/nasset/docs/EEEE-(2)%20Third_Bridge_Now_Report_Final-smallerPix(2)(1).pdf
EEEE-(3) http://www.nobridgetolls.com/nasset/docs/EEEE-(3)%20Definition%20of%20%20alternatives%20being%20presented.1%20Pg.%20%20pdf.pdf

Third Bridge Now
Freeway
Speed 55 MPH
Lift No
High capacity on/off ramps Yes
Freeway 6-lanes 2000 per lane
Managed 2-lanes 2000 per lane
Heavy rail 2-track unknown
LOS Capacity 190,000-200,000 vehicles daily
Fully multi-modal bike and pedestrian
Alignment length approximately 7-miles

CRC Process

The CRC Federal Register describes the project fully, Study Area, and that All alternatives Must be studied Thoroughly benefits and impacts Thoroughly though construction and operations. A-5 http://www.nobridgetolls.com/nasset/docs/A%205%20%20%20%20CRC%20study%20area%20map.2pdf.pdf

What is in a Thorough EIS? (B-5) http://www.nobridgetolls.com/nasset/docs/B-5%20%20what%20is%20in%20a%20thorough%20EIS%20study%201%20page.pdf

Three videos including Steve Stuart and power point
https://www.youtube.com/watch?v=EdoQGGjgHv0

Original Project Scope Columbia River Crossing
Rob DeGraff is explaining the scope of the Columbia River Crossing Project to the CRC Joint Transportation of Washington and Oregon Commission hearing. Stating previous transportation studies recommend added capacity as needed across the river NOT replacement of the current bridges. This statement is consistent with the Federal Register and the CRC Study Area map. The I-5 Transportation and Trade Partnership Environmental Impact Statement.

CRC Project Manager Rob DeGraff
Rob DeGraff is addressing the Columbia River Crossing 39 Member Task Force at their second meeting in 2006. Columbia River Crossing Project is expected to analysis a Third Bridge Corridor. The question was asked about "Studying a Third Bridge Crossing." The Project Manager clearly states that the Federal Highway Administration is expecting it to be looked at and it will be brought in during NEPA Scoping. The Third Bridge Now Corridor was brought in during the Scoping EIS and was removed without being "vetted" deviation from the CRC Federal Register 2005.

Steve Stuart explaining that the "CRC" had turned into a "replacement" project and that alternative where not being studied and they should be.
Information on Third Bridge Now freeway corridor.
Three videos including Steve Stuart and power point
https://www.youtube.com/watch?v=EdoQGGjgHv0

CRC Project Sponsor Council did not want staff to splitting up the evaluation list into an A and B could cause legal challenges and uneven weighing in the study, (FFFF)
http://www.nobridgetolls.com/nasset/docs/FFFF%20A-B%20screening%20not%20split%20pg1%20extra%20info%20%20pg55%20EJAG%202006.pdf

NEW Citizen Handout "All concepts suggested during scoping must be considered. Concepts will be screened using the Evaluation Framework (Step A and Step B screening)" This statement aligns with the Federal Register and the NEPA Process requirements. **CRC staff did not follow Project Sponsor Council's directions and instead did a two step process Screening A and B.** GGGG
http://www.nobridgetolls.com/nasset/docs/GGGG%20%20and%20B%20Screening%20All.pdf
(D-5) http://www.nobridgetolls.com/nasset/docs/D-5%20%20PSC%20do%20not%20have%20two%20screening%20A%20B.pdf

Our first alternative went though the I-5 Partnership and BIA EIS and was recommended for further study from both. The crossing of the Columbia River is in the exact same location adjacent to the BNSF rail bridge. The previous maps and data from the studies clearly states the ports are inside the BIA.

CRC Co-Chair identifying the Bridge Influence Area at the CRC Joint Senators' Oversight Committee hearing. Stating that the ports are inside the Bridge Influence Area: http://www.youtube.com/watch?v=rIEo-jF5WL8&feature=related

CRC Screening A:
False statements concerning location of I-5 corridor, Bridge Influence Area, and CRC project study area.
False statements concerning R-C14 Third Bridge Now location, capacity, length, and connections to existing transportation infrastructure.
Staff used false statements concerning findings of their study

Staff removed alternatives without thoroughly studying the benefits and impact through construction and operations a requirement of all alternatives brought in during NEPA Scoping Process.

CRC Screening A Process

River Crossing RC-14
5.3.4.1 RC-14 New Corridor Crossing
Description:
This component creates a multi-modal bi-state industrial corridor next to the BNSF rail crossing west of the existing I-5 bridges. The north end would start near Mill Plain and Fourth Plain Boulevards in Vancouver and it would travel through Hayden Island connecting to Marine Drive near North Portland Road. This crossing would accommodate freight trains, trucks, autos, bus transit, bikes/pedestrians and potentially light rail. **Figure 5-16** shows this component. shows this component.

CRC Screening A Questions summary page for RC-14 AAAA
http://www.nobridgetolls.com/nasset/docs/AAAA%20%20%20Third%20Bridge%20Orginal%20Maps.pdf
A-6(1) http://www.nobridgetolls.com/nasset/docs/A-6-(1)%20%20%20CRC%20decription%20of%20RC-14.pdf
A-6-(2) http://www.nobridgetolls.com/nasset/docs/A-6-(2)%20%20%20RC-14%20A%20Screeming.pdf

Questions 1- 6 with CRC staff findings and rebuttal to the false statements. B-6
http://www.nobridgetolls.com/nasset/docs/B%206%20A%20Screening%20typed.pdf

Additional data to clarify and answer questions 1-6

Question – 1 Traffic C-6 http://www.nobridgetolls.com/nasset/docs/C-6%20%20%20Cars%20per%20hour%20on%20verus%20roads%20.pdf

Question – 2 Transit Reference attachments Senator Benton letter concerning light rail FTA refusal to do oversight concerning light rail transit service markets (UU),
http://www.nobridgetolls.com/nasset/docs/UU%20%20%20BENTON%20%20CRC_Letter_to_Rogoff,_Location_concerns,_6,3,12-2.pdf
(VV),
http://www.nobridgetolls.com/nasset/docs/VV%20%20Response_letter_from_FTA,_CRC%20Sen%20Benton2.pdf
(WW),
http://www.nobridgetolls.com/nasset/docs/WW%20%20Person%20trips%20to%20Clark%20Co%20dis-or%20map.pdf
(XX),
http://www.nobridgetolls.com/nasset/docs/XX%20%20%20Employment%20center%20light%20rail%20service.pdf
CCCC 1-5
http://www.nobridgetolls.com/nasset/docs/CCCC%20%20%20%20maps%20of%20project%20transit.pdf
CCCC-2 http://www.nobridgetolls.com/nasset/docs/CCCC-2%20%20%20Transit%20maps%20Third%20Bridge%20Maps.pdf
CCCC-3, CCCC-4 http://www.nobridgetolls.com/nasset/docs/CCCC-4%20%20I-5%20Part%20New%20Option4Spead%20rail%20map.pdf

CCCC-5 http://www.nobridgetolls.com/nasset/docs/CCCC-5%20%20%20%20I-5%20Part%20maps%20overview.pdf
(D-6), http://www.nobridgetolls.com/nasset/docs/D-6%20%20%20Person%20trips%20to%20Clark%20Co%20dis-or%20map.pdf
(F-6) http://www.nobridgetolls.com/nasset/docs/F-6%20%20%20BusTwiceAsFast.pdf

Question - 3 Freight (G-6) http://www.nobridgetolls.com/nasset/docs/G-6%20Freight%20and%20Port%20info%20Question%203.pdf

Question – 4 Safety G-(3) http://www.nobridgetolls.com/nasset/docs/G-(3)%20%20%20Baseline%20for%20retaining%20the%20I-5%20bridge%202.pdf
Baseline H-6 http://www.nobridgetolls.com/nasset/docs/H-6%20%20Baseline%20needed.pdf

Question –5 Bike and Pedestrian

Question – 6 Seismic
The CRC findings were the same and /or less then the results from the I-5 Partnership. BIA EIS of the I-5 Partnership a minor arterial capacity numbers and it was not a freeway.

The Importance of the Bridge Influence Area
The Bridge Influence Area Is Identified As Important in these Documents
CRC Federal Register
I-5 Partnership
I-5 Partnership Bridge Influence Area
CRC Purpose and Needs Statement
CRC Step A Evaluation the First 5 Question Concern the Bridge Influence Area

When the results of Screening A came out an enormous backlash about the location of the BIA and size of the BIA took place. Many of the same elected officials, citizens, and business leaders involved in the CRC process participated in the I-5 Partnership BIA only 4 years earlier in 2002. Of the first six questions asked 5 of them had to do with the Bridge Influence Area and if the alternatives were inside the BIA boundaries. Several alternatives were stated as being outside the BIA which were definitely inside the BIA and were previously studied in the original BIA study. The CRC states under their Terms and Definition the Bridge Influence Area "as identified by the Final Strategic Plan for the I-5 Transportation and Trade Partnership."

Next CRC Staff

As the uproar continued CRC staff change the language in the official CRC project purpose statement to remove all references to the Bridge Influence Area. The CRC staff also changed "their" version of the BIA map and replaced the labels with "THE Project Area"

The two Co-Chair Hal Dengerink who had been so passionate about the importance of the BIA to the ports and our economy in the previous link totally ignored the truth. The Oregon Co-Chair Henry Hewitt who participated in the I-5 Partnership and I-5 Partnership BIA also lied. I-6-(1)
http://www.nobridgetolls.com/nasset/docs/I-6-(1)%20%20%20%20BIA-%20Project%20area%20same%20map%20and%20language.pdf
I-6(2), http://www.nobridgetolls.com/nasset/docs/I-6-(2)%20%20BIA%20%20and%20study%20area%20map%20removal.pdf
I-6-(3) http://www.nobridgetolls.com/nasset/docs/I-6-(3)%20%20%20not%20a%20match%20with%20P%20and%20N.pdf

I-6-(4), http://www.nobridgetolls.com/nasset/docs/I-6-(4)%20%20%20Quitely%20redrawing%20the%20BIA%20boundaries.pdf
I –6-(5), http://www.nobridgetolls.com/nasset/docs/I-6-(5)%20%20%20BIA%20misssing.pdf
I-6-(6) http://www.nobridgetolls.com/nasset/docs/I-6-(6)%20%20CRC%20A%20BIA%20listed%20Scree.pdf
I-6-(7) http://www.nobridgetolls.com/nasset/docs/I-6-(7)%20%20%20%20importance%20of%20BIA%20to%20CRC%20(1).pdf

As the email from the Project Manager states several times we tried to establish that the ports and BNSF rail line was inside the Bridge Influence Area. He pointed out that the ports and industrials were not part of the "project area". However the Purpose and Needs Statement identified the "center of the project area to be the two-deep water ports and the transcontinental rail line" not the I-5 freeway. They stated they would only be looking at the study area and to accept our alternatives had been removed. (A-7)
http://www.nobridgetolls.com/nasset/docs/A-7%20%20CRC%20Does%20Not%20include%20Ports%20Project%20manager%20email%20%201338-2008-04-25-S.pdf
Flier (B-7) http://www.nobridgetolls.com/nasset/docs/B-7%20%20%20PRC%20Does%20not%20inclued%20Ports%20flier.pdf

The community needed to accept that the "new project area" and that the Bridge Influence Area part of the study is over.

Screen B

What is in Step B that staff left out of the first round? List B also states the citizen's advisory Task Force small "a" adopted the Problem, Vision, and Values Statement. **That is the stated responsibility of the Project Sponsor Council** not the citizen advisory task force, does that mean they had already self-disband? Remember the CRC Project Sponsor Council refused the Purpose and Needs Statement and the Evaluation Framework that CRC staff created. The FHWA /FTA stepped in and accepted it for the community against the CRC Project Sponsor Council. They forced the citizen advisory committee to "adopt" (small a for adopt in the CRC paperwork.) the Framework for the Evaluation (HHHH)
http://www.nobridgetolls.com/nasset/docs/HHHH%20%20%203B%20screening%20CRC%20process.pdf
(E-5) http://www.nobridgetolls.com/nasset/docs/E-5%20%20FTA%20questions%20concerning%20removal%20of%20projects.pdf

What's missing from Screening B that also did not make it into Screening A? The list does not include clean air, wild life, Environmental Justice, Cultural, Fish, Visual Resources, Water Quality, and noise which are all part of a what is required in a THOROUGH EIS Study.

Screening B
1. Community Livability and Human Resources
2. Mobility, Reliability, Accessibility, Congestion Reduction, and Efficiency
3. Modal Choice
4. Safety
5. Regional Economy, Freight Mobility
6. Stewardship of Natural Resources
7. Distribution of Benefits and Impacts
8. Cost Effectiveness and Financial Resources
9. Growth Management/Land Use
10. Constructability

The CRC Federal Register describes the project fully, location, previous studied, and that All alternatives Must be studied Thoroughly benefits and impacts though construction and operations. (A-5)
http://www.nobridgetolls.com/nasset/docs/A%205%20%20%20%20CRC%20study%20area%20map.2pdf.pdf
What is in a Thorough EIS? (B-5) http://www.nobridgetolls.com/nasset/docs/B-5%20%20what%20is%20in%20a%20thorough%20EIS%20study%201%20page.pdf
"all reasonable options are thoroughly considered. This involves systematic, technical analysis, and public discussion of options and their potential effects."
Then there is the CRC big slide show January 4, 2006 that states "All concepts suggested during scoping must be considered. Concepts will be screened using the Evaluation Framework (Step A and Step B Screening). (GGGG)
http://www.nobridgetolls.com/nasset/docs/GGGG%20%20and%20B%20Screening%20All.pdf

Draft Components Step A Screening Report 6-1

6. Next Steps

"In the next phase of the Alternatives Analysis, transit and river crossing components that passed through the Step A screening will be evaluated further against Step B criteria …" . Pg 86

"In Step A, a component is eliminated from further consideration if it fails (characterized as a fatal flaw) any of the questions that pertain to that component. After Step A, the remaining components will go through a second round of screening where consideration is given to how the component performs relative to other components in the same category. The Next Steps section at the end of this report briefly describes the Step B screening. Pg.15 (HHHH)
http://www.nobridgetolls.com/nasset/docs/HHHH%20%20%203B%20screening%20CRC%20process.pdf

What happen to alternatives "**ALL** Must be considered A and B", or the NEPA EIS Process, the CRC Federal Register, Oregon and Washington Context Sensitive Solutions requirements of a honest, fair, and EQUAL study process shall take place.

How Was Our Alternative Really Removed?

A Dude Got Up And Told Us To Shut Up, Set-Down, And Enjoy Being A Victim!
That Bully Had The Complete Support Of FHWA And FTA At Every Turn!
Exactly Why We Have A NEPA Process To Keep A "Dude Or Two" From Running The Show!

This is about them refusing to STUDY not construct, just study in a fair, honest, and equal process.

ArchMiller_ReplaceBridge.avi.MP4
http://www.youtube.com/watch?v=jdnbvv6Rtgg

> This video is former Vancouver Port Commissioner Arch Miller talking to the CRC Task Force advisory committee before the meeting started and elected official had shown all up yet. He is recommending in his opinion that the Third Bridge not be studied in the CRC study but be moved into the SW Washington Regional Transportation Council Visioning Corridor Study instead. The removal of the Third Bridge Corridor (RC-14) brought in during NEPA Scoping violate the NEPA EIS. The Third Bridge Corridor did not need to be removed to be in the another transportation study. Having Third Bridge studied by two different committees one Bi-state and one regional might

provide different views and questions. Commissioner Miller made a false statements on the findings of the I-5 Partnership study; the official finding are to have a Supplemental or Replacement bridge to add capacity across the Columbia River. The I-5 Partnership of 2002 recommendation took place before the 2005 I-5 bridge inspection that said the bridges have more than 60 years of life left, no restriction and are a compliment to adding infrastructure. Vancouver Port Commissioner, CRC Task Force WA Co-Chair, and with Metro Councilor's Council Member Burkholder's then agree to remove alternatives brought in during NEPA without PROCESS. They forced the Task Force Member **AN advisory committee** to remove alternatives, not following the NEPA Process, or the Federal Register's instruction of the EIS study being Thorough through construction and operations. The Port Commissioner LIED! His willingness to lie, accept staff recommendation and force the advisory Task Force was all because the Project Sponsor Council refused to go along with staff recommendations on the Purpose and Needs Statement and the Evaluation Framework. The elected officials of the Project Sponsors Council had already started their own "BOYCOTTING" of Sponsor Council meetings after months of not meeting they "self-disbanded".

The fact that an elected official would brazenly stand up and tell the official CRC Task Force and community that "HE" Thinks and What "HE" wants and what "HE" believes is that he can tell us what to do and we MUST get inline and do as we are told! Keeping information from the citizens by the government is a First Amendment violation. It is exactly what FHWA Director Cox did to us too. When he said wait for "his" agenda first…. Hide our ideas and then maybe we can have a chance to have a fair and honest process. The ideas that the community has brought forth if we are gooood, little, and obedient "citizens" AFTER HE HAS WHAT he WANTS. The Co-Chair Hal Dengerink's comments to the same CRC Task Force that "CRC staff" keeps saying was the task force that "adopted" the Evaluation Framework was appalling. The okay; everybody, "**BASICALLY**, **we are not studying a third bridge here"**. The blunt get in line, this is what is going down, period, get it, got it, good. FHWA and FTA was sitting in the room when the Vancouver Port Commissioner and the CRC Co-Chair removed the alternative RC-14 Third Bridge Now with those words. We are going to do exactly what "I WANT" because I want it, and I always get me way by abusing my power as an elected official, and making totally false statements.

That Is How Third Bridge Now Freeway Corridor RC-14 Was Removed From The CRC EIS NEPA Process!

OR/WA Joint CRC Oversight Committee Hearing at the beginning of the process.
WA Senator Benton and OR Senator Larry asking questions about a third bridge, a third corridor and that they were expecting to see at least one new "third or fourth" bridge in different location. The represents of the Port of Vancouver and the Port of Portland which are CRC Regional Partners made false statements at the hearing. First that a new corridor would cost too much so that is why we are not studying it? Without a study alignment and design how do you know the cost verse removal of the I-5 bridges? A new corridor on mostly vacant land is cheaper than a highly urbane area of private property with historic properties. He also more than implied the bridges were old and had structure issues after the reports saying no restriction and 60 years of life left had been presented at port hearings. Both ports have been involved in meetings dealing with seismic upgrades of road and rail bridges in our region regularly. The date of this link is well before a Locally Preferred Alternative had been Adopted.
http://www.youtube.com/watch?v=7fI74enogME&feature=related

RC-14 BI-STATE INDUSTRIAL CORRIDOR WAS NOT STUDIED

Confirmed by official letters signed by elected officials, from both of the Washington CRC Signatory Agencies. Letters include members of Oregon and Washington Senate and House, City Of Vancouver Council, and the Board of Clark County Commissioners. There is NO DATA consistent with RC-14 BI-State Industrial Corridor Alternative it was not vetted or studied. (PPP) http://www.nobridgetolls.com/nasset/docs/PPP-(3)%20%20%20CTRAN%20letter%20about%20TBN.pdf

1. November 15, 2010 SW Washington Regional Transportation Council *Signatory Sponsor Agency for CRC (RC-14 was not studied or vetted in the CRC EIS Process) PPP-(2) http://www.nobridgetolls.com/nasset/docs/PPP-(2)%20%20%20RTC%20letter%20TBN%20not%20studied.pdf

2. October 28, 2010 CTRAN *Signatory Sponsor Agency for CRC (RC-14 was not studied or vetted in the CRC EIS Process) PPP-(3) http://www.nobridgetolls.com/nasset/docs/PPP-(3)%20%20%20CTRAN%20letter%20about%20TBN.pdf

3. February 11, 2009 WA Senator Benton and with 12 signatures from elected official from Oregon and Washington Senate and House of Representatives, City of Vancouver and Board of Clark County Commissioners and several are members of the CRC Signatory Agencies and or oversight committees. Letter for US Rep. Earl Blumenauer concerning CRC Process (RC-14 was not studied or vetted in the CRC EIS Process) PPP-(4) http://www.nobridgetolls.com/nasset/docs/PPP-(4)%20%20%20US%20Rep.pdf PPP-(5) http://www.nobridgetolls.com/nasset/docs/PPP-(5)%20%20%20Not%20studied%20Sen%20Benton%20%2012%20letter.%20pdf.pdf

4. July 23, 2010 and again August 29, 2012 Clark County Board of Commissioners sit on *Signatory Sponsor Agency for CRC (RC-14 was not studied or vetted in the CRC EIS Process) PPP-(6) http://www.nobridgetolls.com/nasset/docs/PPP-(6)%20%20BCCC%20formal%20letter%202010%20and%202012.pdf

5. July 22, 2010 Clark County Board of Commissioners sit on *Signatory Sponsor Agency for CRC. 4th Plain being reverted back into a "residential" Hazardous Materials Truck Route. RC-14 was not studied or vetted in the CRC EIS Process and would keep trucks out of the neighborhoods between I-5 and the Port of Vancouver and Fruit Valley Rd. Industrial Area PPP-(7) http://www.nobridgetolls.com/nasset/docs/PPP-(7)%20%20%204th%20Plain%20becoming%20major%20freight.pdf

6. December 12, 2009 Clark County Commissioner Steve Stuart description email "Third Bridge" not studied a good explanation (RC-14 was not studied or vetted in the CRC EIS Process) PPP-(8) http://www.nobridgetolls.com/nasset/docs/PPP-(8)%20%20%20%20Steve%20Stuart%20letter%20explaing%20not%20studiedpdf.pdf

Summary Of The RC-14 Treamtment In The CRC Process

1. Bi-State Industrial Corridor / Third Bridge Now River Crossing 14 (RC-14)

2. During the NEPA Scoping Process for the CRC the Third Bridge Now alternative which included the realignment of I-84, and upgrades on the I-5 freeway between I-405 and the I-5 bridges became an alternative in the CRC EIS as RC-14.

3. The RC-14 was not studied alignment, size, location and capacity were incorrect in Screening A process according the CRC Signatory Agencies, and legislative oversight committee members.

4. The data provided was inaccurate and did not match up with a new freeway corridor 7-miles in length and 4-lanes capacity /in each direction, multi-modal capacity, or with the finding of previous transportation study data of minor arterials in the same location.

5. RC-14 according to the Federal Register, EIS, Oregon and Washington Context Solutions which each requires a Thorough EIS study of ALL of the alternatives brought into the process during Scoping. At the beginning on the first day we were told and in writing ALL Concepts and MUST go through a Thorough EIS study showing benefits and impacts through construction and operations. Screening A and B. Removing alternatives before going through a Thorough Environmental Impact Statement and voiding the NEPA Process requirements disqualify the project from receiving federal funding.

6. RC-14 was removed from the process going against NEPA Process after making false statements about the location of the BIA and the I-5 Corridor. The CRC also did not follow the citizen handouts that stated all alternative must go through A and B Screening.

7. Small print on page 86 of Screening A states only alternatives that passed Screening A would move on to Screening B. HHHH
http://www.nobridgetolls.com/nasset/docs/HHHH%20%20%203B%20screening%20CRC%20process.pdf

8. Screening A was unfairly weight concerning the seismic being "U" unknown and passed and the projects that did not recommend that the current bridges needed to be upgraded "F" failed. NO Baseline if the bridges are kept certain issues will be dealt with in by doing the following fill in the blank. With no project baseline for comparison of the alternatives evaluation are all over the place with both the road and transit have data that does not match with previous studies.

9. After complaints about the BIA being the wrong boundaries continued coming in from elected officials, business, and community. The CRC staff created a "project area" map and removed all language of the BIA from the project purpose statement and maps. NO JOKE they really did that! I-6-(3)
http://www.nobridgetolls.com/nasset/docs/I-6-(3)%20%20%20not%20a%20match%20with%20P%20and%20N.pdf

10. We provided staff with information from the I-5 Transportation and Trade Partnership that the BIA was I-5 Corridor wide and our "port to port connection" #8 West Arterial Short Version was recommended for further from the BIA EIS according to maps and data. They ignore it and continued with the new "project area" map without BIA which was so important that 5 of the 6 questions in Screening A in the process. CRC staff provided documents to FHWA that they accepted even though they new the information to be false.

11. The new "project area" was focused on the I-5 freeway and did not include the two-deepwater ports and the transcontinental rail line. The CRC staff changed the location in the middle of the study. IT IS IN THE CRC PURPOSE AND NEEDS STATEMENT that the ports and rail line are the center.
12. The Vancouver Port Commissioner at the presentation of Screening A, Commissioner Miller stands up and TELLS the CRC Task Force that the Third Bridge (our project) would NOT BE STUDIED in this process. The Co-Chair Hal Dengerink enforces the removal. Listen to the video of the meeting where Third Bridge was removed. At the same time the CRC staff is trying to pass off the citizen advisory committee as "decision-makers" or the small a "approved" by statements accepted the FHWA FTA in the EIS documents.

    ArchMiller_ReplaceBridge.avi.MP4http://www.youtube.com/watch?v=jdnbvv6Rtgg

12. They just ignored us and the project moved on with, we were no longer in the new "project area" staff had created.

13. The support for Third Bridge Now and other alternatives that had all been removed by CRC Staff Screening A "six questions" joined forces as the Smarter Bridge Committee. Citizen advocacy and lobbying of elected officials at all levels government local, state, and federal. We were very successful in having elected officials and committee asking for alternatives to be returned to the process and complete the NEPA Process Thorough study of benefits and impact. Unfortunately even coming from the CRC Signatory Agencies in both Oregon and Washington, CRC Regional Partners, letters signed by elected officials, and in Oregon a Budget Note was attached to ODOT budget. Which is a big deal. Still CRC staff would not add back the alternatives that were removed. Local FHWA staff has backed up CRC staff and gone against several oversight bodies in both states.

    Smart Bridge Committee News Press Conference
    http://couv.com/crc-light-rail-project/smarter-bridge-news-event

    Several elected officials from Oregon and Washington give a news conference. This video is not meant to imply that speakers are members of the concerned citizen Smarter Bridge Committee. After the Record Of Decision on the CRC non of the elected officials or bodies where willing to provide any funding and the ROD died.

    Smarter Bridge Tour version A
    http://www.youtube.com/watch?feature=player_embedded&v=70m2cYXbN9E

    SHORT VIDEO is up on the Smarter Bridge Tour version B
    http://couv.com/crc-light-rail-project/smarter-bridge-tour-pt-1

2011 Oregon Department of Transportation Budget Note required an Independent Review Panel. IRP report detailed IRP videos links CVTV videos of the CRC Independent Review Panel 2010
http://old.cityofvancouver.us/cvtv/cvtvindex.asp?section=25437&folderID=2454
Columbia River Crossing Independent Review Panel - Community Comment Session (6-1-10)
Columbia River Crossing Independent Review Panel Meeting Part 2 (6-1-10)
Columbia River Crossing Independent Review Panel Meeting Part 2 (6-2-10)
Columbia River Crossing Independent Review Panel Meeting Part 1 (6-1-10)
Columbia River Crossing Independent Review Panel Meeting Part 1 (6-2-10)
Columbia River Crossing Independent Review Panel - Community Comment Session (6-17-10)
Columbia River Crossing Independent Review Panel Meeting Part 1 (6-17-10)
Columbia River Crossing Independent Review Panel Meeting Part 2 (6-17-10)
http://old.cityofvancouver.us/cvtv/cvtvarchive2/Community_Events/2010_Events/Columbia_River_Crossing_Independent_Review_Panel_7-7-10.wmv
http://old.cityofvancouver.us/cvtv/cvtvarchive2/Community_Events/2010_Events/CRC_Independent_Review_Panel_Part_1_6-1-10.wmv
PPP-(10) http://www.nobridgetolls.com/nasset/docs/PPP-(10)%20%20%20IRP_report.pdf

14. Oregon Governor Kitzhaber call the CRC task force committees "The Governor's Task Force" and directed the process and staff which was beyond their Roles and Responsibility. The Governor was "A" Signatory Agency, not "The" Signatory Agency excluding all agencies and oversight committee from their responsibility. This dominance was totally anti NEPA and FHWA FTA went with it because the focus was the removal of the bridges and a toll the FHWA publicly known agenda.. Kitzhaber had to

leave office in disgrace and legal issues concerning CRC. Unfortunately Governor Brown had exactly the same policy and dishonest practices.

15. With none of the CRC Signatory Agency able to affect the process, Regional Partner also had no power, and CRC Project Sponsor Council self disbanding unable work with CRC staff the process continued to limp along. There are several letters stating major concerns though the entire process. I have listed a few letters from elected officials identifying problems and concerns in the first part of the report.

16. The Third Bridge Now freeway corridor affects approximately 20 properties in the entire 7-miles and all upgrades to I-5 and I-84, and upgrades to I-5 freeway are inside the Right Of Way in Oregon. Verse CRC with hundreds of pieces of property, plus bridges, roads, infrastructure removed and direct on the I-5 freeway. We can avoided direct impacts on the I-5 freeway, downtown Vancouver and uptown Vancouver yet still accomplish goals of adding capacity in crossing the Columbia River.. What type of "government" REFUSES to at the very least study alternatives with such enormous community impacts on the "staff recommended" replacement bridge project. We are talking about studying alternatives so we can avoid these horrible impacts on residential areas, the removal of at least one school, several historically protected properties, all the disruptions to families, and the community. The economic damage to our trade and transportation with of 9 to 11 years of construction on the I-5 freeway and the only alternative crossing the over capacity I-205 bridge.

17. The importance of the Multnomah County Democratic Party 2020 Platform stating to keep and maintain infrastructure when possible. The Legislative Action Items: the need for additional port to port bridges between Oregon and Washington. The platform also identified having a third bridge constructed and open before any changes are made to the I-5 freeway bridges. The importance of this document in showing support for new infrastructure road, bridges, and rails in the Portland and Vancouver area must be pointed out. CRC staff has stated in meetings that Oregon is against more "bridges" in different locations and they can't build a bridge half-way cross the Columbia River. This laugh line is untrue. Unfortunately any elected officials that ask questions about a third bridge or make statements in favor of additional bridges are publicly attacked, until they step back in line.

Multnomah County Democratic Party 2020 Platform
Article XIII. Infrastructure — Platform of the Multnomah County Democratic Party

The Preamble states several time the importance of maintaining, preserving, upgrade, reuse and recycle infrastructure as often as possible.
LEGISLATIVE ACTION ITEMS
11.
We support continuing efforts to improve intra-city transportation to address inequities and ineffectiveness in current system.
12.
We support transportation infrastructure into and out of our ports, industrial areas and employment centers that is fast, efficient, multi-modal, and environment friendly.
13.
We support port-to-port bridge connections between Oregon and Washington — at Woodland, WA to St. Helens, OR; and at Camas, WA to Troutdale, OR – in order to strengthen the economy with efficient commercial connections, and the environment with less driving and congestion.
14.
We insist that a third freeway-bridge crossing between Oregon and Washington be open and usable before any major changes or closures are made to the I-5 and I-205 freeway bridges for other than maintenance.

15.
We call on the Oregon Legislature to require advance announcements of Estimated Time of Arrival (ETA) for all marine commercial vessels needing I-5 freeway bridge lifts. Com (1)
http://www.nobridgetolls.com/nasset/docs/com%201%202020%20%20Mutl%20County%20Dem%20PlateformArticle%20XIII.pdf

Steps we have taken

The local leaders, elected officials, and several committees from the very beginning stood up for our communities and common sense against the CRC dishonest process. The local FHWA people were contacted in writing and on a face to face level with the problems and every time went against citizens and elected officials when providing oversight and helped the process to continue limping along. The local FHWA saw over a hundred newspaper articles against CRC, forums in both states lead by elected officials and citizens groups with hundreds in attendance. The Mayor's of both Portland and Vancouver in a written letter with other signatories against CRC stating they wanted change in the process immediately, being ignored. The entire Clark County Board of Commissioner was against CRC and several actively very publicly working against it. The CRC process was a slog, the EIS started as 18-months and $20-million and 7 years and $240-millions later the local FHWA signed everything was fine with the CRC process and it received the ROD over the objection of the many "community" partners.

Transportation Sectary Buttigieg was sent as a Register package of over 400 pages booklet in the US Mail. It was forwarded back to the same office that the abuse took place, with a few of the same "employees" of the FHWA /FTA that signed the original Record of Decision in 2011 to provide oversight. Differently a problem with that the mail was not addressed to them, they are the one who created the problem we currently have. The local FHWA FTA offices had already received plenty of information on problems and illegalities of the CRC process and refused to provide oversight. After a few phone calls about the package and months having passed. I received an email from the local FHWA office that had received the letter and they repeat the same word salad excuse of previous letters. I provided you the letter. So they have reaffirmed that they liked the process and the outcome and see no problems or concerns. Not one word was said about the 400+ booklet of data of false and illegal activities. There was also no answer to the Freedom Of Information Act requests made in the letters in the booklet. Letter with over 450 booklet of date. Letter 1-(1), 1-(2), 1-(3)

Included in this report is some information on the support for Third Bridge Now freeway corridors and upgrades on the I-5 freeway from the communities the I-5 freeway is placed.
Celebrate North Portland 2011 award com (7)
http://www.nobridgetolls.com/nasset/docs/com%207%20%20Awards%20-%20three.pdf
Celebrate North Portland 2017 award com (2)
http://www.nobridgetolls.com/nasset/docs/com%202%20Celebrate%20North%20Portland%202017%20Award.pdf

St Johns' Review community newspaper Aug. 26, 2005
North Portland group expresses own ideas and solutions for improving I-5 traffic, by Gayla Patten Com (3)
http://www.nobridgetolls.com/nasset/docs/com%203%20%20%20St%20Johns'%20good%20review%20copy.pdf
The Columbian newspaper Vancouver WA March 1, 2002
Selling the "Northwest Passage" by Thomas Ryll Com (4)
http://www.nobridgetolls.com/nasset/docs/com%204%20SellingTheNWPassage.pdf
The Oregonian newspaper March 1, 2002
New Northwest Passage has traffic relief in mind by Fred Leeson com (5)
http://www.nobridgetolls.com/nasset/docs/com%205%20newspaper%20nw%20passage.pdf
The Oregonian newspaper
Solution to traffic in St. Johns hits road block by Bill Stewart com (6)
http://www.nobridgetolls.com/nasset/com%206%20%20All%20side%20agree%20an%20new%20Bridge.pdf

This picture shows the I-5 freeway has a Level Of Service rating of F since the 1980's with approximately 30,000 vehicles daily cutting through the neighborhoods to avoid congestion. com (10)
http://www.nobridgetolls.com/nasset/docs/com%2010%20I-5%20full%20ramps.pdf

Impact map shows direct impacts on 14- different neighborhoods com (8)
http://www.nobridgetolls.com/nasset/docs/COM%208%20%20Pg35_from_Neighborhoods_and_Population_TechnicalReport-1.pdf

New Bridge and Freeway Corridor Into the Ports Out of the Neighborhoods com (9)
http://www.nobridgetolls.com/nasset/docs/com%209%20I-305%20Map%20into%20ports%20of%20N%20streets-R.pdf

http://www.nobridgetolls.com/nasset/docs/com%2011%20cartoon%20Inslee.pdf
http://www.nobridgetolls.com/nasset/docs/com%2012%20toll%20graph%20fuel%20vs%20tolls.pdf
http://www.nobridgetolls.com/nasset/docs/com%2013%20I-305_flyer_4._20143_-c-1-4%20%20%20fornt.pdf
http://www.nobridgetolls.com/nasset/docs/com%2014%20I-305_flyer_4.2014..._back-JK-1.%20%20%20backpdf.pdf
http://www.nobridgetolls.com/nasset/docs/Letter%201-%20(1)%20%20May%2021,%202022.%20letterdoc.pdf
http://www.nobridgetolls.com/nasset/docs/Letter%201-%20(2)%20%20may13%20A%20short%20list%20of%20abuses%20and%20why%20outside%20intervention%20%E2%80%A6.pdf

Which is better than FHWA Inspector General Horowitz was sent as a Register package of 400+ page booklet and a letter asking for oversight. He received the package October 7, 2022 yet has not acknowledged receiving the package, and has not tried to contact us. Letter 2
http://www.nobridgetolls.com/nasset/docs/10.2.2022%20Inspector%20General%20Horowitz.pdf

Were is the current Bridge Replacement Project in the process

November 2020 was the project kick-off was three years ago

All meetings are still on-line with no sign-in sheets, unable to tell how many citizens are involved and citizens are unable to show that they have participated in the process. They are also not providing meeting minutes because they are "video"

All decision making meeting take place Monday-Friday between 9-5PM

We do not have a formally Adopted Purpose and Needs Statement or Evaluation Frame

We do not have a Locally Preferred Alternative

The US Coast Guard has stated if a new bridge is put in it will need to be a lift to met current shipping needs.

The project now that three years of deliberation and the majority of the major decisions concerning the project has been made will have citizen involvement. Staff is now starting the citizen involvement meeting to let us know what "they" plan on doing to us. When you check out their web site it is missing vital information and all of the former transportation studies that where on-line in 2010 have broken links now. Why? https://www.interstatebridge.org/

We are asking that US Representative Chavez-DeRemer a member of your office in DC make an appointment to hand the US Secretary of Transportation Pete Buttigieg a letter and this report that has been made for you. We are also asking that at the time of delivery of the letters and data links a phone appointment time is made were you and US Transportation Secretary can talk and hopefully take action.

1. All new contractors, vendors and staff, local, state and federal employee as recommended in CRC Independent Review Panel 2010 to reinstate trust and integrity into the process for Constructability.

2. Provide a team to putting the alternatives and components from community into presentable form. Stating the elements with maps, and clear data for entering in the EIS study.

Sharon Nasset

[redacted]



You're Invited
To
Come Ride The Rails Between Portland And Vancouver

The views show industrial sanctuaries, residential neighborhoods, rivers, mountains, bridges, and a large portion of the vacant public land we want to turn into a new multi-modal freeway corridor. Amtrack runs several times daily – pick a date and we will provide you with a delightful tour.

This will give you an idea of other tours.

Smarter Bridge Tour version A
http://www.youtube.com/watch?feature=player_embedded&v=70m2cYXbN9E

SHORT VIDEO is up on the Smarter Bridge Tour version B
http://couv.com/crc-light-rail-project/smarter-bridge-tour-pt-1

Smarter Bridge Committee press conference article and video! http://couv.com/crc-light-rail-project/smarter-bridge-news-event

Mr. Steven Fischer, Bridge Program Administrator June 18, 2023
13th Coast Guard District
Waterways Management
[redacted]

Mr. Fischer,

Good Day Sir, I am asking for clarity and your opinion on statements and recommendations I have been making concerning the Truman-Hobbs Act and the addition of a second lift in the BNSF rail bridge across the Columbia River. I am copying elected official and interested parties so we will all have the benefit of knowledge on this subject.
Thank you kindly,
Peace,
Sharon Nasset

Truman-Hobbs Act process is nearing the final steps of the process.

Here is a summary of where we are in the process.

Attached as a reference is Title 33 - Navigational and Navigable Water Chapter 1 - Coast Guard, Department of Homeland Security Subchapter J. – Bridges
Part 116 - -Alternation of Unreasonable Obstructive Bridges

The Truman –Hobbs Act Hearing process concerning the Columbia River Crossing bridges and the Burlington Northern Sa Fe rail bridge crossing started over 2 decades ago. The findings of the extensive process has at this point is yes, there is an Unreasonable Obstructive Bridge issue do to the need for a lift in the BNSF rail line in line with the Columbia River Crossing's Barge Channel. *116.01 General E - (1)*

The process has found that the hazard must be mediated with an additional second lift on the BNSF rail bridge in line with the Columbia River Crossing's Barge Channel commonly known as "the Humps".

The 1958 addition of a second Columbia River Crossing was a "twin" bridge design because the first bridge was known to be an engineering marvel of it's time. The Federal Highway Department or the Oregon and Washington Departments of Transportation at the time of the second crossing construction choose to raised the bridge(s) height creating a barge channel. The barge channel was put into lessen the need to have bridge lifts and interrupting traffic on the bridges. The benefit was for the traffic on the land and bridge only. This narrow view did not take into account the marine traffic and their safety. The addition of a second lift on the BNSF rail would have had significant benefit at that time, as it will now with less bridge lifts helping the traffic on the bridges. The FHWA- OR-WA created the navigational hazards for their benefit.

The financial analysis determined that the majority of all the benefits from removal of the hazard that the FHWA-OR-WA created, with the addition of a second lift on BNSF rail bridge was to the highway, and 95% less lift of the historically protected bridges. The marine hazard although one of the top ten worse Navigable Water hazards in the United States must seek funding from the benefactor the FHWA and not Truman-Hobbs Act funds. 116.35 Order to Alter. C

The United State Coast Guard has 116.35 (d) has ability to force compliance to pay for and remove the obstruction.

Burlington Northern Santa Fe company has several reasonable grievances concerning this issue.

In 1908 when they built the rail bridge which was first in this local the lift span followed marine standards.

In 1958 the addition of barge channels on the Columbia River Crossing created a water hazard and made their rail bridge a target and more likely to be hit.
BNSF company has been drug into decades of hearings, "conversations", and meetings about adding an additional second lift on the BNSF rail bridge to remove the water hazard that FHWA-OR-WA created, annoys them.

The current lift that lines up with the Columbia River Crossing lift must remain and be maintained at the expense of BNSF company for marine traffic height taller that the barge channel.

The addition of a second lift on the BNSF rail bridge lessens the Columbia River Crossing bridges lifts by 95% . HOWEVER BNSF rail bridge will not have less lifts.
BNSF feels having to have two lifts to accommodate the freeway is going above what is normally required.

The FHWA-OR-WA caused the problem for their benefit and an additional lift is the answer to the hazard, also benefits the FHWA-OR-WA therefore they need to pay for it in full.
The BNSF company believes the expenses and loss of revenue associated with construction need to be reimbursed

The second lift will have operations and maintenance cost associated with it. The BNSF company feels that the FHWA-OR-WA should pay for maintenance of the second lift. They feel it is unreasonable to be financially responsible for two lifts to benefit the highway traffic.

Except that the rail bridge will no longer be a target for marine traffic the only real benefit is a slightly quicker lift for rail traffic.

Current Status

The need for an Order to Alter has been established
Non-navigational benefits will require contribution from interested parties

Next Steps

Timeline for US Coast Guard

The Coast Guard needs to send the rail bridge owner "The 60-Day Letter" notifying the owner of the rail bridge that an Order to Alter will be issued.
The Coast Guard needs to send the FHWA "The 60-Day Letter" notifying them that they will be financially responsible for the necessary costs associated with the Order to Alter.
When will this happen?

The Willamette River rail bridge had a lift upgrade in the 1980's it took 72 hours. As we enter our 3rd or 4th decade of discussions on this issue please look upon this as an opportune time to finally add a second lift. It is wonderful to be a part of something that benefits all parties associated with this venture. The marine safety, safer for all the bridges, helps freeway traffic, protects the historic bridges, less noise, and air pollution from idling cars.

The elected officials local and federal are excited to see this project move forward. They are interested in expediting this situation to a quick conclusion and are willing to give the US Coast Guard any support it needs to accomplish this goal immediately. The current Oregon Senator Lew Fredrick is the Transportation

Chair and this is his district and he would love to see it done. Our US Representative Lori Chavez-DeRemer is on the House transportation committee in congress and is also very willing to help. There is a long list of elected officials who have supported this and several others who are currently in office that are willing to give support. The FHWA **has money** at this time for infrastructure that helps the environment, economy, and is basically shovel ready.

My understand from earlier US Coast Guard Hearings that the additional lift had to be in place before any changes could be made to the current Columbia River Crossings. This is meant to lessen the bridge lift during any construction or changes to the bridges. Is that true? If so then either way the bridges must be upgraded and the sooner the better for all concerned.

The I-5 Portland / Vancouver Transportation and Trade Partnership EIS of 2002 recommended updating the BNSF rail bridge lift cross the Columbia River. *

Thank you so much for your time Mr. Fischer I greatly appreciate your knowledge and help in clarifying the BNSF rail bridge and the to add a second lift.

I have two other questions of clarification;

Can the US Coast Guard please require proof from an independent bridge inspection stating the Columbia River Crossing bridges need to be removed for safety issues or not?

The CRC Independent Bridge Review Panel in 2010 stated that a full and independent inspection of the bridges was necessary before any conversation about removing or replacing the bridges should even have taken place. They were appalled that over 4 years into the process that the state of the structures was not fully known. *

The I-5 Portland / Vancouver Transportation and Trade Partnership EIS of 2002 stated a need to add capacity across the Columbia River. The EIS identified that we have fewer bridges than similar sized metropolitans in the US and if we added four bridges we would still be in last place for the number of crossings. The recommendation to add capacity with a supplemental or replacement bridge was made in 2002 before the 2005 Interstate Bridges Electrical Update Project findings ***"The two bridges have a full-time crew on deck to keep the aging structures in top operation condition. … This personalized care, combined with large maintenance projects, has kept the spans healthy and free of weight restrictions. With ongoing preservation, the bridges can serve the public for another 60 years." ****

Staff performing the Environmental Impact Statement has REFUSED multiple requests from the CRC Signatory Agencies, elected officials, business leaders, and community representatives to have a full and complete independent inspection of the Columbia River Crossing bridges by a bridge company specializing in historical properties. With the most resent 2005 reports on the bridges giving them decades of serviceable life. Maintaining and preserving available infrastructure like the current bridges and adding more crossings in different locations is very important. The I-5 Portland / Vancouver Transportation and Trade Partnership EIS of 2002 stated a need to add capacity across the Columbia River not that the Columbia River Crossing needed to be demolished. The I-5 Partnership EIS stated a supplemental or replacement bridge and update the BNSF rail bridge.

Previously and current CRC staff continually make the misleading statement repeating what the Governors' "hand picked" I-5 Partnership citizen advisory task force gave as a preference "A New Bridge with light rail" NOT what the I-5 Partnership EIS recommended. The age of the bridges is not the issue, we have several bridges in our area that are older. It is the condition of the bridges and the need to stick to the FHWA and

the states of Oregon and Washington maintain and preservation of our current infrastructure when ever possible.

A justification to remove the Columbia River Crossings bridges has not been provided.
The SW Washington Regional Transportation Director Don Wagner's presentation to the Washington Transportation Commission in 2005 he stated that the bridges where in "pristine condition" and thicker than the original specification called for with; the 1917 being in the best condition.

Can the US Coast Guard please require an independent bridge company specializing in seismic retro-fitting of bridges inspection the Columbia River Crossings bridges?

A company that specializes in seismic retro-fitting has NOT evaluated or made recommendations concerning the Columbia River Crossings. This finding in 2010 by the Independent Review Panel shocked them. They found it unacceptable that the previous transportation studies stated the bridges could be seismically retro-fit for approximately $50-million and now CRC staff was saying $650-million. Without a company that specializes in seismic retro-fitting of bridges providing the different levels how did staff go from $50-million to $650-million? The CRC Independent Bridge Review Panel stating not having an actual Request For Proposal concerning the seismic needs of the bridges was unprofessional. That having a "meeting" with engineers that deal with seismic on buildings not bridges did not come close to dealing with the issues of upgrading a bridge and the work they showed on the CRC web site was beyond misleading it is embarrassing.

The Independent Bridge Review Panel pointed out a major concern the Columbia River Crossings a solid steel bridge, a l-mile long, a massive amount of weight, might stay in one piece and become un-moored. The bridges loose smashing into levies, ports, downtown Vancouver, going up or down river reeking havoc and causing major damage to infrastructure. They recommended staff immediately have a seismic bridge company evaluated, to study alternative, and investigate the bridge self-detaching a decade has passed without any action.

Beware…. The same staff that started in 2005 with an 18-month $20-million EIS. Eight years later over $240-million with a Locally Preferred Alternative everyone hated. The project was so awful that the FEIS could not raise $1 in support federal, state, local, or private funding and died. Staff states that it will be **at least** 9-11 years of construction on I-5 and over the river disturbing marine traffic.

So again Sir, please help us understand what is happening with the BNSF rail bridge and the addition of a second lift. If the US Coast Guard or the US Army Corp of Engineers would please require a full independent inspection of the current Columbia River Crossing bridges showing if it needs to be replaced. Please complete seismic evaluation by a company specializing in bridges. Easy stuff.

Peace,
Sharon

Mr. Steven Fischer, Bridge Program Administrator June 18, 2023
13th Coast Guard District
Waterways Management

Attached as a reference

Title 33 - Navigational and Navigable Water Chapter 1 - Coast Guard, Department of Homeland Security Subchapter J. – Bridges
Part 116 - -Alternation of Unreasonable Obstructive Bridges
https://www.ecfr.gov/current/title-33/chapter-I/subchapter-J/part-116 (and link)

"If a proposed alteration to a bridge has desirable, non-navigational benefits, the Chief, Office of Bridge Programs may require an equitable contribution from any interested person, firm, association, corporation, municipality, county, or state benefiting from the alteration as a prerequisite to the making of an Order to Alter for that alteration".

2. I-5 Portland /Vancouver Transportation and Trade Partnership 2002 - Finding At A Glance "fix" the BNSF rail bridge lift issue and add more capacity.

3. Federal Register /Vol. 70, No. 186 /Tuesday, September 27, 2005 /Notices 56523 for the CRC Environmental Impact Statement

4. 2005 Interstate Bridges Electrical Update Project findings (Columbia River Crossings)
"The two bridges have a full-time crew on deck to keep the aging structures in top operation condition. … This personalized care, combined with large maintenance projects, has kept the spans healthy and free of weight restrictions. With ongoing preservation, the bridges can serve the public for another 60 years."

5. I-5 Partnership 2002 graph fewer bridges than similar sized metropolitan

6. CRC Independent Review Panel 2010 video links. Here are the links the first one has the statements.
CVTV videos of the CRC Independent Review Panel 2010
http://old.cityofvancouver.us/cvtv/cvtvindex.asp?section=25437&folderID=2454
Columbia River Crossing Independent Review Panel - Community Comment Session (6-1-10)
Columbia River Crossing Independent Review Panel Meeting Part 2 (6-1-10)
Columbia River Crossing Independent Review Panel Meeting Part 2 (6-2-10)
Columbia River Crossing Independent Review Panel Meeting Part 1 (6-1-10)
Columbia River Crossing Independent Review Panel Meeting Part 1 (6-2-10)
Columbia River Crossing Independent Review Panel - Community Comment Session (6-17-10)
Columbia River Crossing Independent Review Panel Meeting Part 1 (6-17-10)
Columbia River Crossing Independent Review Panel Meeting Part 2 (6-17-10)
http://old.cityofvancouver.us/cvtv/cvtvarchive2/Community_Events/2010_Events/Columbia_River_Crossing_Independent_Review_Panel_7-7-10.wmv
http://old.cityofvancouver.us/cvtv/cvtvarchive2/Community_Events/2010_Events/CRC_Independent_Review_Panel_Part_1_6-1-10.wmv
http://old.cityofvancouver.us/cvtv/cvtvarchive2/Community_Events/2010_Events/CRC_Independent_Review_Panel_Meeting_Part_2_6-1-10.wmv

Joint OR/WA Transportation Commissioners' Hearing presentation Original CRC EIS Scope
https://www.youtube.com/watch?v=EdoQGGjgHv0
Smarter Bridge Committee press conference article and video
http://couv.com/crc-light-rail-project/smarter-bridge-news-event

This content is from the eCFR and is authoritative but unofficial.

Displaying title 33, up to date as of 5/24/2023. Title 33 was last amended 5/23/2023.

Title 33 —Navigation and Navigable Waters
Chapter I —Coast Guard, Department of Homeland Security
Subchapter J —Bridges

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§ 116.01 General.
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§ 116.30 Chief, Office of Bridge Programs Review and Evaluation.
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§ 116.40 Plans and specifications under the Truman-Hobbs Act.
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§ 116.50 Apportionment of costs under the Truman-Hobbs Act.
§ 116.55 Appeals.

PART 116—ALTERATION OF UNREASONABLY OBSTRUCTIVE BRIDGES

Authority: 33 U.S.C. 401, 521.

Source: CGD 91–063, 60 FR 20902, Apr. 28, 1995, unless otherwise noted.

EDITORIAL NOTE

Editorial Note: Nomenclature changes to part 116 appear by USCG–2008–0179, 73 FR 35012, June 19, 2008 and USCG–2010–0351, 75 FR 49410, Aug. 13, 2010.

§ 116.01 General.

(a) All bridges are obstructions to navigation and are tolerated only as long as they serve the needs of land transportation while allowing for the reasonable needs of navigation.

(b) This part describes the general procedures by which the U.S. Coast Guard determines a bridge to be an unreasonable obstruction to navigation and issues an Order to Alter under the authority of

the following statutes, as appropriate: Section 18 of the Rivers and Harbors Appropriations Act of 1899, 33 U.S.C. 502; Section 4 of the Bridge Act of 1906, 33 U.S.C. 494; or the Truman-Hobbs Act of 1940, as amended, 33 U.S.C. 511–524.

(c) A bridge constructed across a navigable water of the United States shall not unreasonably obstruct the free navigation of the water over which it was constructed, either due to insufficient height or width of the navigation span, or because of difficulty in passing through the draw opening. If any bridge unreasonably obstructs navigation, the Commandant, U.S. Coast Guard, will order the alteration of that bridge. Alterations may include structural changes, replacement, or removal of the bridge.

(d) Whenever the Coast Guard has good reason to believe that a bridge across any of the navigable waters of the United States is an unreasonable obstruction to navigation, the Coast Guard will give notice to the owner of the bridge and other interested parties, and hold a public meeting at which the interested parties will have a full opportunity to be heard and to provide information on the question of whether alterations to the bridge are necessary and, if so, the extent of alterations needed.

(e) If the Coast Guard determines that alterations to a bridge are necessary, the Commandant, U.S. Coast Guard, will issue to the bridge owner an Order to Alter containing details of the alterations necessary to render navigation through or under the bridge reasonably free, easy, and unobstructed.

(1) In the case of a railroad or publicly owned highway bridge, an Order to Alter is issued to the bridge owner under the provisions of the Truman-Hobbs Act (33 U.S.C. 511 *et seq.*). In ordering these alterations, the Coast Guard will give due regard to the necessities of free and unobstructed navigation and of rail and highway traffic. For alterations to bridges governed by the Truman-Hobbs Act, the Coast Guard must approve general plans, specifications, and contracts for the alteration project, as well as approving the apportionment of the total cost of the alterations between the United States and the bridge owner.

(2) For all other bridges, the Order to Alter will contain the required alterations for the bridge and will prescribe a reasonable time in which to accomplish the required alterations. The bridge owner is responsible for the entire cost of the required alterations.

[CGD 91–063, 60 FR 20902, Apr. 28, 1995, as amended by USCG–2010–0351, 75 FR 49410, Aug. 13, 2010]

§ 116.05 Complaints.

Any person, company, or other entity may submit to the District Commander of the Coast Guard district in which a bridge over a navigable water of the United States is located, a complaint that a bridge unreasonably obstructs navigation. The complaint must be in writing and include specific details to support the allegation.

§ 116.10 Preliminary review.

(a) Upon receipt of a written complaint, the District Commander will review the complaint to determine if, in the District Commander's opinion, the complaint is justified and whether a Preliminary Investigation is warranted.

(1) The District Commander's opinion as to whether or not the complaint warrants a Preliminary Investigation will be formed through informal discussions with the complainant, users of the affected waterway, the owner of the bridge, and other interested

parties.

(2) In forming an opinion, the District Commander may also review the district files, records of accidents, and details of any additional written complaints associated with the bridge in question.

(b) In the absence of any written complaint, the District Commander may decide, based on a bridge's accident history or other criteria, to conduct a Preliminary Investigation.

(c) The District Commander will inform the complainant and the Chief, Office of Bridge Programs of the determination of any Preliminary Review. If the District Commander decides that the bridge in question is not an unreasonable obstruction to navigation, the complainant will be provided with a brief summary of the information on which the District Commander based the decision and will be informed of the appeal process described in § 116.55. There will be no further investigation, unless additional information warrants a continuance or reopening of the case.

[CGD 91–063, 60 FR 20902, Apr. 28, 1995, as amended by CGD 96–026, 61 FR 33663, June 28, 1996; USCG–2013–0397, 78 FR 39174, July 1, 2013]

§ 116.15 Preliminary investigation.

(a) During the Preliminary Investigation, the District Commander will prepare a written report containing all pertinent information and submit the report, together with a recommendation for or against the necessity of a Detailed Investigation, to the Chief, Office of Bridge Programs.

(b) The Preliminary Investigation Report will include a description of the nature and extent of the obstruction, the alterations to the bridge believed necessary to meet the reasonable needs of existing and future navigation, the type and volume of waterway traffic, and a calculation of the benefits to navigation which would result from the proposed bridge alterations.

(c) The Chief, Office of Bridge Programs will review the Preliminary Investigation Report and make a Preliminary Decision whether or not to undertake a Detailed Investigation and a Public Meeting.

(d) If after reviewing the Preliminary Investigation Report, the Chief, Office of Bridge Programs decides that further investigation is not warranted, the complainant will be notified of the decision. This notification will include a brief summary of information on which the decision was based and details of the appeal process described in § 116.55.

[CGD 91–063, 60 FR 20902, Apr. 28, 1995, as amended by CGD 96–026, 61 FR 33663, June 28, 1996; USCG–2012–0306, 77 FR 37314, June 21, 2012; USCG–2013–0397, 78 FR 39174, July 1, 2013; USCG–2014–0410, 79 FR 38433, July 7, 2014]

§ 116.20 Detailed investigation.

(a) When the Chief, Office of Bridge Programs determines that a Detailed Investigation should be conducted, the District Commander will initiate an investigation that addresses all of the pertinent data regarding the bridge, including information obtained at a public meeting held under § 116.25. As part of the investigation, the District Commander will develop a comprehensive report, termed the “Detailed Investigation Report”, which will discuss: the obstructive character of the bridge in question; the impact of that bridge upon navigation; navigational benefits derived; whether an alteration is needed to meet the needs of navigation; and, if alteration is recommended, what type.

(b) The District Commander will forward the completed Detailed Investigation Report to the Chief,

Office of Bridge Programs for review together with a recommendation of whether the bridge should be declared an unreasonable obstruction to navigation and, if so, whether an Order to Alter should be issued.

[CGD 91–063, 60 FR 20902, Apr. 28, 1995, as amended by CGD 96–026, 61 FR 33663, June 28, 1996; USCG–2013–0397, 78 FR 39174, July 1, 2013]

§ 116.25 Public meetings.

(a) Any time the Chief, Office of Bridge Programs determines that a Detailed Investigation is warranted, or when Congress declares a bridge unreasonably obstructive, the District Commander will hold a public meeting near the location of the bridge to provide the bridge owner, waterway users, and other interested parties the opportunity to offer evidence and be heard, orally or in writing, as to whether any alterations are necessary to provide reasonably free, safe, and unobstructed passage for waterborne traffic. The District Commander will issue a public notice announcing the public meeting stating the time, date, and place of the meeting.

(b) When a bridge is statutorily determined to be an unreasonable obstruction, the scope of the meeting will be to determine what navigation clearances are needed.

(c) In all other cases, the scope of the meeting will be to address issues bearing on the question of whether the bridge is an unreasonable obstruction to navigation and, if so, what alterations are needed.

(d) The meeting will be recorded. Copies of the public meeting transcript will be available for purchase from the recording service.

[CGD 91–063, 60 FR 20902, Apr. 28, 1995, as amended by CGD 96–026, 61 FR 33664, June 28, 1996; USCG–2013–0397, 78 FR 39174, July 1, 2013]

§ 116.30 Chief, Office of Bridge Programs Review and Evaluation.

(a) Upon receiving a Detailed Investigation Report from a District Commander, the Chief, Office of Bridge Programs will review all the information and make a final determination of whether or not the bridge is an unreasonable obstruction to navigation and, if so, whether to issue an Order to Alter. This determination will be accompanied by a supporting written Decision Analysis which will include a Benefit/Cost Analysis, including calculation of a Benefit/Cost Ratio.

(b) The Benefit/Cost ratio is calculated by dividing the annualized navigation benefit of the proposed bridge alteration by the annualized government share of the cost of the alteration.

(c) Except for a bridge which is statutorily determined to be an unreasonable obstruction, an Order to Alter will not be issued under the Truman-Hobbs Act unless the ratio is at least 1:1.

(d) If a bridge is statutorily determined to unreasonably obstruct navigation, the Chief, Office of Bridge Programs will prepare a Decision Analysis to document and provide details of the required vertical and horizontal clearances and the reasons alterations are necessary.

(e) If the Chief, Office of Bridge Programs decides to recommend that the Commandant issue an Order to Alter, or a bridge is statutorily determined to unreasonably obstruct navigation, the Chief, Office of Bridge Programs will issue a letter to the bridge owner (“The 60-Day Letter”) at least 60 days before the Commandant issues an Order to Alter. This letter will contain the reasons an alteration is necessary, the proposed alteration, and, in the case of a Truman-Hobbs bridge, an estimate of the total project cost and the bridge owner's share.

(f) If the bridge owner does not agree with the terms proposed in the 60-Day Letter, the owner may request a reevaluation of the terms. The request for a reevaluation must be in writing, and identify the terms for which reevaluation is requested. The request may provide additional information not previously presented.

(g) Upon receipt of the bridge owner's response, the Chief, Office of Bridge Programs will reevaluate the situation based on the additional information submitted by the bridge owner. If after the Chief, Office of Bridge Programs reviews the determination, there is no change, the Commandant may issue an Order to Alter as set out in § 116.35. The Administrator, Office of Bridge Programs determination based on the reevaluation will constitute final agency action.

[CGD 91–063, 60 FR 20902, Apr. 28, 1995, as amended by CGD 96–026, 61 FR 33664, June 28, 1996; USCG–2013–0397, 78 FR 39174, July 1, 2013]

§ 116.35 Order to Alter.

(a) If the bridge owner agrees with the contents of the 60-Day Letter, if no reply is received by 60 days after the issuance of the letter, or if after reevaluation a bridge is determined to be an unreasonable obstruction to navigation, the Commandant will issue an Order to Alter.

(1) If a bridge is eligible for funding under the Truman-Hobbs Act, the Order to Alter will specify the navigational clearances to be accomplished in order to meet the reasonable needs of navigation.

(2) An Order to Alter for a bridge that is not eligible for Truman-Hobbs funding will specify the navigational clearances that are required to meet the reasonable needs of navigation and will prescribe a reasonable time in which to accomplish them.

(b) If appropriate, the Order to Alter will be accompanied by a letter of special conditions setting forth safeguards needed to protect the environment or to provide for any special needs of navigation.

(c) If a proposed alteration to a bridge has desirable, non-navigational benefits, the Chief, Office of Bridge Programs may require an equitable contribution from any interested person, firm, association, corporation, municipality, county, or state benefiting from the alteration as a prerequisite to the making of an Order to Alter for that alteration.

(d) Failure to comply with any Order to Alter issued under the provisions of this part will subject the owner or controller of the bridge to the penalties prescribed in 33 U.S.C. 495, 502, 519, or any other applicable provision.

[CGD 91–063, 60 FR 20902, Apr. 28, 1995, as amended by CGD 96–026, 61 FR 33664, June 28, 1996; USCG–2013–0397, 78 FR 39174, July 1, 2013]

§ 116.40 Plans and specifications under the Truman-Hobbs Act.

(a) After an Order to Alter has been issued to a bridge owner under the Truman-Hobbs Act, the Chief, Office of Bridge Programs will issue a letter to the bridge owner outlining the owner's responsibilities to submit plans and specifications to the Chief, Office of Bridge Programs for the alteration of the bridge. The plans and specifications, at a minimum, must provide for the clearances identified in the Order to Alter. The plans and specifications may also include any other additional alteration to the bridge that the owner considers desirable to meet the requirements of railroad or highway traffic. During the alteration process, balanced consideration shall be given to the needs of rail, highway, and marine traffic.

(b) The Chief, Office of Bridge Programs will approve or reject the plans and specifications submitted by the bridge owner, in whole or in part, and may require the submission of new or additional plans and specifications.

(c) When Chief, Office of Bridge Programs has approved the submitted plans and specifications, they are final and binding upon all parties, unless later changes are approved by the Chief, Office of Bridge Programs. Any changes to the approved plans will be coordinated with the District Commander.

[CGD 91–063, 60 FR 20902, Apr. 28, 1995, as amended by CGD 96–026, 61 FR 33664, June 28, 1996; USCG–2013–0397, 78 FR 39174, July 1, 2013]

§ 116.45 Submission of bids, approval of award, guaranty of cost, and partial payments for bridges eligible for funding under the Truman-Hobbs Act.

(a) Once the plans and specifications for a bridge eligible for funding under the Truman-Hobbs Act have been approved, the bridge owner must take bids for the alteration of the bridge consistent with the approved plans and specifications. Those bids must then be submitted to the Chief, Office of Bridge Programs for approval.

(b) After the bridge owner submits the guaranty of cost required by 33 U.S.C. 515, the Chief, Office of Bridge Programs authorizes the owner to award the contract.

(c) Partial payments of the government's costs are authorized as the work progresses to the extent that funds have been appropriated.

[CGD 91–063, 60 FR 20902, Apr. 28, 1995, as amended by CGD 96–026, 61 FR 33664, June 28, 1996; USCG–2013–0397, 78 FR 39174, July 1, 2013; USCG–2014–0410, 79 FR 38433, July 7, 2014]

§ 116.50 Apportionment of costs under the Truman-Hobbs Act.

(a) In determining the apportionment of costs, the bridge owner must bear such part of the cost attributable to the direct and special benefits which will accrue to the bridge owner as a result of alteration to the bridge, including expected savings in repairs and maintenance, expected increased carrying capacity, costs attributable to the requirements of highway and railroad traffic, and actual capital costs of the used service life. The United States will bear the balance of the costs, including that part attributable to the necessities of navigation.

(b) “Direct and special benefits” ordinarily will include items desired by the owner but which have no counterpart or are of higher quality than similar items in the bridge prior to alteration. Examples include improved signal and fender systems, pro rata share of dismantling costs, and improvements included, but not required, in the interests of navigation.

(c) During the development of the Apportionment of Costs, the bridge owner will be provided with an opportunity to be heard. Proportionate shares of cost to be borne by the United States and the bridge owner are developed in substantially the following form:

> Total cost of project _____ $_____
> Less salvage ____ $____
> Less contribution by third party ____ $____
> Cost of alteration to be apportioned
> ____ $____
> Share to be borne by the bridge owner:

Direct and Special Benefits:
a. Removing old bridge ____ $____
b. Fixed charges ____ $____
c. Betterments ____ $____
Expected savings in repair or maintenance costs:
a. Repair ____ $____
b. Maintenance ____ $____
Costs attributable to requirements of railroad and/or highway traffic ____ $____
Expenditure for increased carrying capacity ____ $____
Expired service life of old bridge ____ $____
Subtotal ____ $____
Share to be borne by the bridge owner
____ $____
Contingencies ____ $____
Total ____ $____
Share to be borne by the United States
____ $____
Contingencies ____ $____
Total ____ $____

(d) The Order of Apportionment of Costs will include the guaranty of costs.

§ 116.55 Appeals.

(a) Except for the decision to issue an Order to Alter, if a complainant disagrees with a recommendation regarding obstruction or eligibility made by a District Commander, or the Chief, Office of Bridge Programs, the complainant may appeal that decision to the Deputy Commandant for Operations.

(b) The appeal must be submitted in writing to the Commandant (CG–DCO–D), Attn: Deputy for Operations Policy and Capabilities, U.S. Coast Guard Stop 7318, 2703 Martin Luther King Jr. Avenue SE., Washington, DC 20593–7318, within 60 days after the District Commander's or the Chief, Office of Bridge Programs decision. The Deputy Commandant for Operations will make a decision on the appeal within 90 days after receipt of the appeal. The Deputy Commandant of Operations' decision of this appeal shall constitute final agency action.

(c) Any Order of Apportionment made or issued under section 6 of the Truman-Hobbs Act, 33 U.S.C. 516, may be reviewed by the Court of Appeals for any judicial circuit in which the bridge in question is wholly or partly located, if a petition for review is filed within 90 days after the date of issuance of the order. The review is described in section 10 of the Truman-Hobbs Act, 33 U.S.C. 520. The review proceedings do not operate as a stay of any order issued under the Truman-Hobbs Act, other than an order of apportionment, nor relieve any bridge owner of any liability or penalty under other provisions of that act.

[CGD 91–063, 60 FR 20902, Apr. 28, 1995, as amended by CGD 96–026, 61 FR 33663, June 28, 1996; CGD 97–023, 62 FR 33363, June 19, 1997; USCG–2008–0179, 73 FR 35013, June 19, 2008; USCG–2010–0351, 75 FR 36283, June 25, 2010; USCG–2013–0397, 78 FR 39174, July 1, 2013; USCG–2014–0410, 79 FR 38433, July 7, 2014]

Index Attachments and Electronic Links

Mural Linnton Community Center Cover #1 attachment

Intro letter Opportunity Knocks #2 attachment

Martin Luther King JR's Quote #3 attachment

Summary

Columbia River Crossing(s) the I-5 Bridge condition from 2005 with Oregon State Seal
http://www.nobridgetolls.com/nasset/docs/H-(1)%20%20Bridge%20cond%20of%20I-5%20freeway%202005.JPG.pdf

Social Injustice and Lack of Process Report Summary (3-pgs) #4 attachment

Request For Action

Immediate Action is Requested (3-pgs) #5 attachment

Picture showing I-5 Freeway 1-mile south of the I-5 bridges is over-capacity
http://www.nobridgetolls.com/nasset/docs/com%2010%20I-5%20full%20ramps.pdf

Community Support

Location, Location, Location (2-pgs) #6 attachment

Into the Ports and Out of the Neighborhoods with a new freeway corridor
http://www.nobridgetolls.com/nasset/docs/com%209%20I-305%20Map%20into%20ports%20of%20N%20streets-R.pdf

Traffic Average Daily Total map showing inhuman freight traffic levels
http://www.nobridgetolls.com/nasset/docs/G-5%20%20%20R2011.0328_Third_Bridge_Now_Report_Final-smallerPix(2)%20pg11%20and%2022maps.pdf%20%20f.pdf

Third Bridge Now Multi-modal map link.
https://www.youtube.com/watch?v=nzaMpNR-Wj8&t=1006s

Celebrate North Portland 2011 and 2017 (3-pags)
http://www.nobridgetolls.com/nasset/docs/com%207%20%20Awards%20-%20three.pdf

Picture of one community of three meetings held by community members. #7 attachment

Vacant land Far Less Impacts In Primary Area Of Potential Impacts than I-5 construction #8 attachment

Solution to truck traffic in St. Johns hit roadblocks
http://www.nobridgetolls.com/nasset/docs/com%206%20%20All%20side%20agree%20an%20new%20Bridge-L.pdf

St Johns' Review http://www.nobridgetolls.com/nasset/docs/com%205%20newspaper%20nw%20passage.pdf

New Northwest Passage has traffic relief in mind
http://www.nobridgetolls.com/nasset/docs/com%205%20newspaper%20nw%20passage.pdf

Multnomah County Democrat Platform 2020 Infrastructure calling for additional bridges first (6pgs)
http://www.nobridgetolls.com/nasset/docs/com%201%202020%20%20Mutl%20County%20Dem%20PlateformArticle%20XIII.pdf

Third Bridge Now brochure (Pgs.2)
http://www.nobridgetolls.com/nasset/docs/com%2013%20I-305_flyer_4._20143_-c-1-4%20%20%20fornt.pdf
http://www.nobridgetolls.com/nasset/docs/com%2014%20I-305_flyer_4.2014... back-JK-1.%20%20%20backpdf.pdf

Report

Social Injustice and Lack of Process Report for Secretary Buttigieg (pgs-29) #9 attachment

Train Tour

Invitation to take a tour anytime you wants
Links showing previous tours using the train, buses, and light rail to see the entire project #10 attachment

Selling the "Northwest Passage" (pgs-2)
http://www.nobridgetolls.com/nasset/docs/com%204%20SellingTheNWPassage.pdf

Tour Route map
Third Bridge Corridor Conceptual Layout map showing residential and industrial sanctuaries
Tour Program
Tour Schedule #11 attachment

Third Bridge Corridor Preliminary Benefit Analysis 2011 (pgs-26)
http://www.nobridgetolls.com/nasset/docs/EEEE-(2)%20Third_Bridge_Now_Report_Final-smallerPix(2)(1).pdf

Celebrate North Portland Award 2017 –for Transportation Alternative Thank You All! (with me)
http://www.nobridgetolls.com/nasset/docs/com%202%20Celebrate%20North%20Portland%202017%20Award.pdf

BNSF Rail Bridge U.S. Coast Guard

Request For Action from:

U.S. Coast Guard and FHWA to move forward on the addition of a second lift on the BNSF rail bridge benefiting the environment and highway and marine safety. (pgs-5) Report #12 attachment

CFR :: 33 CFR Part 116 -- Alteration of Unreasonably Obstructive Bridges (pgs-7) #13 attachment

Federal Register CRC
http://www.nobridgetolls.com/nasset/docs/I%20%20%20%20%20Fed%20Reg%20CRC%20good.pdf
http://www.nobridgetolls.com/nasset/docs/I%20-(2)%20%20%20fed%20reg%20with%20boxes%20and%20arrows-2.pdf

I-5 Portland /Vancouver Transportation and Trade FEIS recommendations
http://www.nobridgetolls.com/nasset/docs/ZZ%20%20final_recc_at_glance.pdf

Link web site for CRC data
http://www.nobridgetolls.com/nasset/

Location, Location, Location

Transportation is a deep important dive for our end of town. Our location because of the physical attributes and investments made makes us the economic engine of the State. With this opportunity we need to provide the infrastructure that protect the communities that surround our industrial sanctuaries, while supporting the businesses needs. The Mississippi and Columbia Rivers are the only rivers that goes from the ocean into the interior of the U.S. we have deepwater ports and services on the peninsula. The only transcontinental rail in the U.S. BNSF, continental rail to the east coast, Marine Dr Corridor, Columbia Corridor, Lombard HWY-30 By-pass, east-west roads, I-5 freeway, Greeley, Interstate Ave, Albina Ave, Vancouver Ave, MLK Blvd north-south roads. Rivergate, Port of Portland, Northgate, Marine Dr.-Hayden Meadows, and Swan Island employment centers are all in North Portland. This tells us to make sure we pay attention to adding enough infrastructures that is fully multi-modal with more benefits than negative impacts.

We have one bridge the St. Johns' Bridge that goes through the center of town. Only the Marine Dr Corridor is not using our residential streets to reach the land-locked industrial areas. During the 2001 St. Johns' Truck Strategy Hearing at Portland City Council Mayor Katz and the Council Members stated. That the truck problems in St. Johns' and North Portland were inhuman and the only place in State where trucks traffic was allowed to trump community livability. http://www.nobridgetolls.com/nasset/docs/G-5%20%20%20R2011.0328_Third_Bridge_Now_Report_Final-smallerPix(2)%20pg11%20and%2022maps.pdf%20%20f.pdf

Transportation meetings concerning adding capacity across the Columbia River are starting up again in the spring of 2024. When citizens have become fully involved in the process they have made the outcome much better. In 2001 the Portland City Council did not formally Adopt the St. Johns' Truck Strategy. Part of that plan not adopted was to raise the speed limit for trucks, turning Ivanhoe St. into a "truck corridor" with sound walls from the bridge to St. Louis and then west on Lombard St. That did not happen because people wrote letters, made calls, and showed up. With facts and data from original transportation studies, meetings, and letters from elected officials that can be used to clear up misinformation issues. We have to put the puzzle pieces together from former transportation studies it is part of the vigilance of being between two mighty rivers the Willamette and the Columbia.

Here is what has taken place:

> In the 1980's Oregon and Washington Legislators met and accepted the Federal Highway "F" rating Level Of Service (LOS) for the I-5 freeway in north Portland from I-84 to the I-5 bridges.
>
> In 2002 the I-5 Portland /Vancouver Transportation and Trade Partnership EIS recommended capacity across the Columbia River with a Supplemental **or** a Replacement bridge.
>
> In 2005 an independent I-5 bridge(s) inspection had a favorable report including the bridges having more than 60 years of life left.
>
> In 2002 the bridge alternative #8 adjacent to the BNSF rail line was recommended out of the I-5 Partnership EIS for further study not just a replacement bridge.
>
> The Columbia River Crossing EIS during NEPA Scoping identified *RC-14 Bi-State Industrial Corridor freeway adjacent to the BNSF rail line as an alternative. * Third Bridge Now

CRC staff stated in official documents and the video shows CRC staff removing RC-14 without process. CRC staff, not the Project Sponsor Council, CRC Signatory Agencies, legislative oversight committees, or the citizen's advisory CRC Task Force

Letters from the CRC Signatory Agencies and elected official that the NEPA Process was not followed, RC-14 was not studied or vetted.

It is a lie when ODOT – WADOT – and the Bridge Replacement Project say that Third Bridge Now freeway corridor was studied or vetted. It is also a lie to say EIS for the I-5 Partnership stated a Replacement Bridge only. The required NEPA Citizen Comment Period on the "Replacement Bridge Project" will be started soon. They need to hear from you that you want a thorough and honest study, that removing RC-14 was wrong, unfair, and won't be tolerated.

Transportation staff can't say theirs, "staff's idea is best" without comparing it to an alternative at lease as large and with comparable amenities as the only project they are studying. Comparing alternatives side by side to show how or why it works or not should not be "feared" by staff. It needs to be an enjoyable challenge that different alternatives being studied offer.

Metro a CRC Signatory Agency, President and Project Sponsor Council member David Bragdon letter date May 5, 2021 (B)
http://www.nobridgetolls.com/nasset/docs/B%20%20%20%20%209%20%20David%20Bragdon%20May%205.pdf
Metro a CRC Signatory Agency, President and Project Sponsor Council member David Bragdon letter date May 19, 2010 (A)
http://www.nobridgetolls.com/nasset/docs/A%2010%20DavidBragdonCRCReviewMay19.pdf

This link has 2 testimonies from citizen comment and Metro Councilor Brian Newman's comments on the CRC process https://www.youtube.com/watch?v=hBfc4rifWcc&t=332s

Third Bridge Now moving map link
https://www.youtube.com/watch?v=nzaMpNR-Wj8&t=1006s

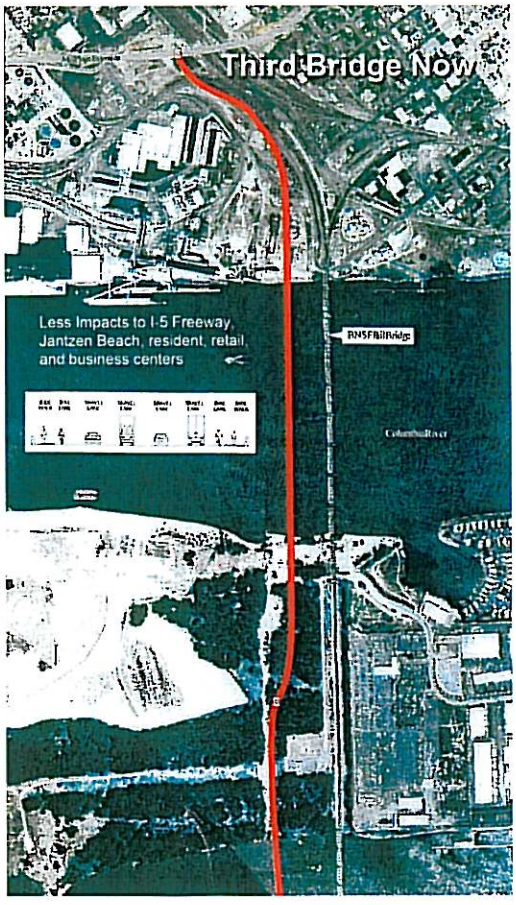
RC-14 is www.ThirdBridgeNow.org

www.thirdbridgenow.com

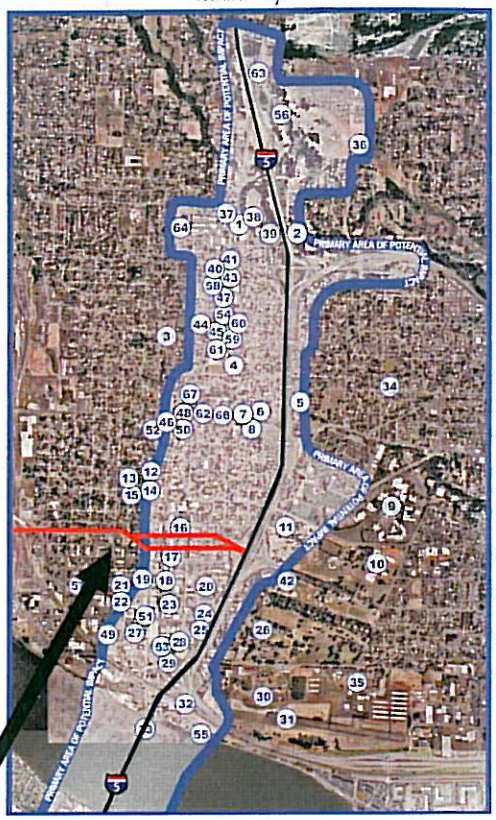


FAR less impact

Potential impact of **new Third Bridge Proposal** is outlined



Washington Neighborhoods resource map — Columbia River CROSSING



Primary Area of Potential Impact

for Columbia River Crossing proposed project:

Oregon Neighborhoods resource map — Columbia River CROSSING



New Third Bridge

The new Third Bridge at the railroad crossing is away from neighborhoods:

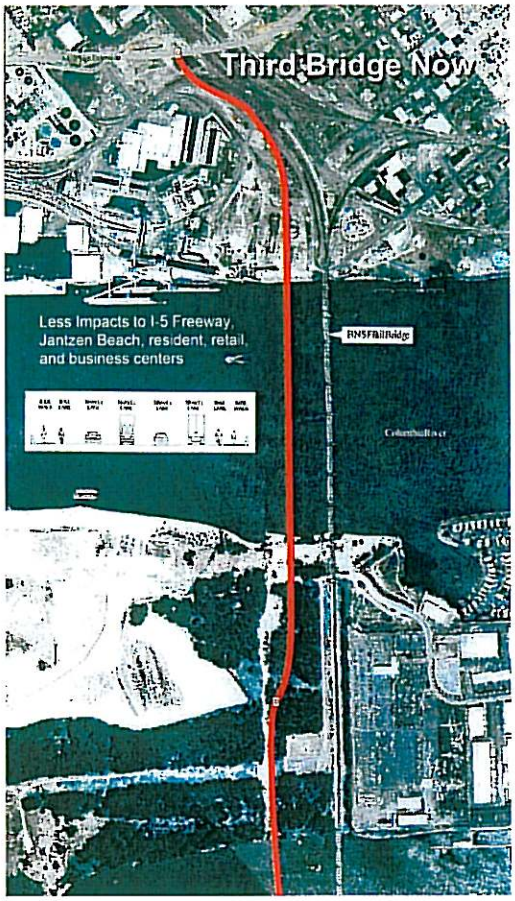


FAR less impact

Potential impact of **new Third Bridge Proposal** is outlined

"Primary Area of Potential Impact" for Columbia River Crossing proposed project:

- Historic Ft, Vancouver
- Approximately one hundred homes
- Jantzen Beach businesses and homes
- High bridge "lands" far away from river
- Very Expensive, costs $2-6 Billion



Washington Neighborhoods resource map

Columbia River CROSSING



Primary Area of Potential Impact

for Columbia River Crossing proposed project:

Oregon Neighborhoods resource map

Columbia River CROSSING



US Secretary of Transportation Pet Buttigieg
US Department of Transportation
12000 New Jersey Ave. SE
Washington DC 20590
United States of America

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Honorable Secretary Buttigieg,

Thanks you so much Secretary Buttigieg for your work on our local transportation issues. I appreciate that as the Transportation Secretary you want your staff to be competent, inclusive, and working for a solution that has the support of the community that the I-5 freeway affects the most. We are looking for a fair, honest, and equal process that shows benefits and impact through construction and operation of alternatives including ours. We have the most at stake and have been begging to be at the table for two–decades now.

Again thank you, Secretary Buttigieg for understanding that there are several large problems and concerns with the former CRC and the current Bridge Replacement Project. The root of the problems is the FHWA and FTA employees who have accepted false, incorrect, misleading and missing data from the CRC since 2005. The personal agendas that the former FHWA Oregon Director David Cox had of adding a "New" I-5 bridge before he retired into "his" portfolio still causes problems today. The official and intelligent handling of infrastructure is for states and federal agencies to work to preserve and maintain when ever-possible vital infrastructure. The 2005 inspection of the I-5 bridges states they have more than 60 years of life left, have no restriction, have had personal care and complement any long-range plans to manage and improve transportation in the I-5 corridor between the two states. Director Cox calls the bridges solid in his emails while demanding the historically protected bridge be removed because he wanted a "new" bridge. This is the exact reason that there is a NEPA Process to stop the overreaching and thugging of FHWA and FTA.

The appropriate response from the FHWA and FTA is please bring your alternatives in and we will thoroughly and equally study the benefits and impacts through construction and operations the data will show the best project to go forward. The best alternative for construction will be found in an inclusive and fair process. Instead Director Cox said, we the community needed to understand he knew what was best and there would not be a process of alternatives it would be his agenda only and we needed to take a back seat to the professional. If and when he accomplished his personal strategy we might have a "chance" with what the community wanted and that we need to accept this is how the process would play out.

The FHWA and FTA accepted false, inaccurate, misleading, missing, from the CRC NEPA EIS Process. The local elected official that sat on oversight committees, boards of Signatory Agencies, and the joint bi-state legislative oversight committees all stated at the time the data was wrong. The FHWA and FTA knew that the data was absolutely false just from comparing it to the previous studies of two years earlier. The elected officials and members of the public brought the information directly to the FHWA and FTA they refused to provide oversight, correct information, check information, or provide verification of accuracy.

The 2010 Independent Review Panel for the CRC stated that everyone associate with the current CRC process should be removed to establish creditability with the process and community. Unfortunately they only removed the project manager. The newest project boasts how many employees and companies from the former CRC project still keep plugging away on the Bridge Replacement Project . CRC had 6 or 8 project manages from 2005 to FOD in 2011.

A little over 2 years ago a staffer from US Senator Wyden office and I had a conversation after a JPACT meeting, about the former CRC and the Bridge Replacement Project having major concerns and complaints

with elected officials, businesses associations, community leaders, and citizens. I stated yes and there was plenty of data to back up what they were saying about the process. The staffer asked me to put together what I had and send it to him with the focus on federal issues and how I thought they should be addressed. It took me a few months and I put together a booklet of over 400 pages of data concerning the CRC and the issues that had been identified previously.

The two-page letter from the local FHWA and FTA oversight employees 9 months later with no answers, pushing back on what had been said, and repeating false statements was the answer to the booklet addressed to Secretary Buttigieg. Either the employees did not read the 400 plus page report sent to the US Secretary of Transportation, they did not understand what they read, or they are corrupt. The root of the problem is FHWA and FTA accepting bad information, refusing to do honest oversight, and a project staff that refused to take direction for the Sponsor Agencies or the oversight committees.

I have been involved in the transportation studies starting as a community forum representative for the North Portland Business Associates and as the transportation chairperson. I authored the West Arterial Alternative # 8 accepted into to the I-5 Portland Vancouver Transportation and Trade Partnership Study EIS, BIA EIS a the "port to port" connection, and the realignment of I-5 and I-84, full interchange at Lombard and Columbia Blvd. Plus the addition of acceleration and deceleration lanes within the Right Of Way between the Rose Quarter and the I-5 bridges on the I-5 freeway. Our community projects were identified during the NEPA Scoping Process for the CRC and became alternatives. The Federal Register for the CRC EIS states alternatives must go through a thorough study showing benefits and impact including construction and operations. Then the alternatives are compared showing the benefits and impacts to make a full informed decision. The NEPA Process was not followed and our projects where removed without being vetted or studied. The FHWA could not let the process continue because our projects at every level Third Bridge Now out preformed Cox's "new" bridge by removing the current bridges. A thorough and honest EIS of our alternatives has been kept from being preformed. Clearly because they have the greatest benefits with the least amount of negative impacts. The CRC staff would have placed our alternatives accurately and in full view to point out the problems and reasons to not continue with our alternatives. The hiding, lying, and removing of our projects is a lot of work. We deserve a full understanding of the benefits and impact of our chosen "locally preferred alternative". There is absolutely no reason to refuse us a process that is fair, honest, equal, and inclusive.

I am starting this summary of the abuse with statements from others who have publicly pointed out the same problems with the CRC, the base project, and the current Bridge Replacement Project.

1.
Portland Metro Council a Signatory Agency of the CRC and a member of the CRC Project Sponsor's Council hearing on the process issues. This link has 2 testimonies from citizen comment and Metro Councilor Brian Newman's comments on the CRC process
https://www.youtube.com/watch?v=hBfc4rifWcc&t=332s

2
Metro a CRC Signatory Agency, President and Project Sponsor Council member David Bragdon letter date May 19, 2010 (A)
http://www.nobridgetolls.com/nasset/docs/A%2010%20DavidBragdonCRCReviewMay19.pdf

3
Metro a CRC Signatory Agency, President and Project Sponsor Council member David Bragdon letter date May 5, 2021 (B)

http://www.nobridgetolls.com/nasset/docs/B%20%20%20%20%209%20%20David%20Bragdon%20May%205.pdf
4

Portland's Mayor, Vancouver's Mayor, Clark County Commissioner and Metro President sent a "polite" letter in January 19, 2010 5 years into the CRC process listing a number of major problems with the process and the need to restore public trust and confidence as well as study other alternatives. The FHWA providing oversight did not inform the Mayors and Commissioners that the Governors were another Co-Agency and not the sole CRC Decision Maker and the CRC Signatory Agencies C-TRAN, RTC, Metro, and TriMet had vote and veto. This reality would have been a total game changer in the CRC process removing leadership, Decision Making, and recommendations from the CRC staff to oversight bodies. C-(1) C-(2) C-(3)
http://www.nobridgetolls.com/nasset/docs/C-(1)%20%20%202008PSC%20Problem%20to%20Gov.pdf
http://www.nobridgetolls.com/nasset/docs/C-(2)%20%20%20CRC%20Sponsor%20Council%20Problems%20%20C-TRAN.pdf
http://www.nobridgetolls.com/nasset/docs/C-(3)%20%20%20Coaliton%20letter%20against%20CRC.pdf

5
A Bridge Too False May 31, 2010 Willamette Week newspaper Portland Oregon (D)
http://www.nobridgetolls.com/nasset/docs/D%20%20%20%20A%20Bridge%20Too%20False.pdf

6
US House of Representative Jamie Herrera Beutler wrote a letter to the C-TRAN Board of Directors a CRC Signatory Agency dated September 25, 2013. "I am concerned that the Board may have been presented with misleading information about a false deadline"- The false information "presented to the Board" an oversight CRC Signatory Agency was from CRC staff with FTA in the many meetings pushing false funding statements. (E)
http://www.nobridgetolls.com/nasset/docs/E%20%20%20US%20Rep%20Herera%20Beutler%20C-TRAN_Board_Letter.pdf

7
The environmental justice committees of the CRC were many. The committees started early in 2005 in Vancouver, Jantzen Beach, and North Portland. The meetings would stop and start and suddenly disband with a new "official" groups of new people to the process. This happened several times with the north Portland no longer having any an environmental group, which is where I-5is located. Then ODOT removed funding from our North Portland environmental justice office, which handled several environmental topics forcing its closure. The Jantzen Beach Environmental Justice Working Group email dated January 18, 2011 stating problems, concerns and upset that they are being "disband" by staff during the EIS NEPA Process before Record Of Decision. * a charge of $50 for paper copy Draft EIS
Metro Council on the CRC DEIS Hearing Environmental Justice leader Ms Jerri Sundval-Williams
www.PortlandDocs.com/CRC/JerriWilliams-070222.wmv (F)
http://www.nobridgetolls.com/nasset/docs/F%20%20CRC%20ejag%20issues%20WG%20disband.pdf

8.
Elected officials during the CRC that made **public comments** that the CRC project had provided false, inaccurate, missing, misleading, false data, conflicting data, and/or information. This list does not include current elected officials who had made the statements then for comfort because they are currently involved in the process and working with staff. This is a broad list of elected officials in several levels of oversight, in both states, and both parties.

US Rep. Jamie Herrera Beutler, Mayors of Vancouver Pollard, Leavitt, Vancouver Council Members Bill Turlay, Jeanne Stewart, Pat Campbell, Portland Mayor Sam Adams, Clark County Commissioners Betty Sue Morris, Steve Stuart, Marc Bolt, Tom Mielke, David Madore, Multnomah County Commissioner Serena Cruz, WA Senators Pam Roach, Bob Morton, Jim Honeyford, Bob McCaslin, Don Benton, WA Rep Bruce Chandler, Vancouver Port Commissioner Jerry Oliver, Oregon Senators Gary George, Larry George, Oregon Representatives Dennis Richardson, Mitch Greenlick, Jim Thompson, Metro President David Bragdon, Councilors Robert Liberty, Bob Stacy.

I know you understand there are major problems with the process. I started with a list of concerns from several directions to provide context to our situations. With this many elected officials and agencies having a range of issues you can imagine how poorly the citizens where treated in the CRC process.

The Situation At Hand

1.
The current I-5 bridges are structurally sound, have no restriction, at least 60 years of life left, can be seismically retro-fit and are formally listed as Federal Historical Resources with protection status. This is from 2005 inspection the 4(f) Historical Resource requirements of the NEPA process have not been followed. Nationals Parks and Recreation Department State Historic Preservation Office's (SHPO) letter March 6, 2007 states protected historical properties have been ignored in the CRC process. It is both Feasible and Prudent to avoid these and other properties on the National Federal Historic Registry. The list includes both of The Columbia River Crossing bridges, Fort Vancouver Reserve properties, Red Cross Building, hospital building (may not be on register), Pearson Airport, and businesses in historic downtown Vancouver, historic neighborhoods, historic homes, and thousands of native artifacts. When it is feasible **or** prudent 4 (f) Historical Resource that are protected and must be avoided. Under 4(f) Historic Resource requirements CRC DOES NOT quality for federal funding because of major demolishing of several federally protected properties. There are alternatives that avoid protected properties! G-(1), http://www.nobridgetolls.com/nasset/docs/G-(1)%20%20SHPOletter_of_concern_about_CRC.pdf G-(2) http://www.nobridgetolls.com/nasset/docs/G-(2)%20%20%20color%20historic%20handouts..pdf, G-(3), http://www.nobridgetolls.com/nasset/docs/G-(3)%20%20%20Baseline%20for%20retaining%20the%20I-5%20bridge%202.pdf G-(4) http://www.nobridgetolls.com/nasset/docs/G-(4)%204%20(F)%20History,%20Feasible%20and%20Prudent%20and%20letters.X%20pdf.pdf

2.
We have several bridges in our state that are not as structurally sound as the I-5 bridges and bridges that are older. To remove available infrastructure because of age goes against current policy of preserve and maintain basic engineering practice. H-(1) http://www.nobridgetolls.com/nasset/wpimages/wpd41e3250_06.png H-(2) http://www.nobridgetolls.com/nasset/docs/H-(2)%20%20%20%20bridge%20ok%20list%20age%20of%20local%20bridges.pdf

3.
The Federal Register /Vol. 70, No. 186 /Tuesday, September 27, 2005 /Notices for the CRC provides project specifics. The purpose of the CRC project is clearly identified as adding capacity across the Columbia River inside the I-5 Corridor. The Federal Register gives the boundaries of I-5 Corridor I-5, I-205, I-84, names all the Co-Agencies, previous studies are to be used including the I-5 Portland Vancouver Transportation and Trade Partnership recommending adding capacity across the Columbia River. CRC staff change the project purpose, location and only accepted Governor and FHWA FTA as oversight.
(I) http://www.nobridgetolls.com/nasset/docs/I%20%20%20%20%20Fed%20Reg%20CRC%20good.pdf

(I-2) http://www.nobridgetolls.com/nasset/docs/I%20-(2)%20%20%20fed%20reg%20with%20boxes%20and%20arrows-2.pdf

4.
Division Administrator David O. Cox FHWA Division Administration Oregon email dated March 22, 2006 "I think our goal should be ….." "So what we are trying to do is to pursue a strategy the will us .." ".. There is no question that both other projects can still stand on their own as necessary and cost effective" "I hope that you can accept (or at least not object to) this strategy." (J)
http://www.nobridgetolls.com/nasset/docs/J.%20%20%20FHWY_DAvid_Cox_letter.%20%20goodpdf.pdf

5.
Division Administrator David O. Cox FHWA Division Administration Oregon second email
Cox's email states that the bridge are sound, can handle the load. Plus it is known that the I-5 bridges can be retro-fit for a once every thousand year event starting as low as $50-million was stated in the I-5 Partnership. The one bridge has already gone through 100 years of earthquakes with no signs of stress, the 1957 bridge show no sign of stress either. So why is Cox's pushing so very hard to remove infrastructure instead of maintain and preserver? 4(f) Historically Protected bridges that have more than 60 years left? It was all about his ego and he wanted a new bridge in his portfolio. **Cox retired years ago and we are still stuck with his lies, faults data, bullying,** The FHWA "dude" providing "oversight" are find with continuing the bullying and **Do not believe in the consent of the governed**.
FHWA Director said " As far as the I-5 bridges… structurally sound means that they have not lost (much) capacity since they're initial construction and are still able to handle the loads. However they were originally construction to what we now consider to be inadequate seismic stands." Therefore the bridges need seismic upgrades to meet the new seismic criteria. (K)
http://www.nobridgetolls.com/nasset/docs/K%20%20%20FHWA%20COX's%20second%20email.pdf

This Is Not Just About Having A Dishonest Process
It Is About The Breaking Of Open Meetings Law, Sunshine Laws,
And Making Written False Statement To State And Federal Agencies.

The Purpose and Needs Statement and other founding documents were not formally Adopted by the Project Sponsor Council or the CRC Signatory Agency for the Columbia River Crossing. Therefore there is no valid process and the federal Record Of Decision needs to be revoked for the Columbia River Crossing.

The Interstate Bridge Replacement Project Environmental Impact Statement currently in process does not have an Adopted Purpose and Needs Statement and other founding documents have not been formally Adopted by a Project Sponsor Council or the Signatory Agency.
Is the Bridge Replacement Project a valid process? How can they be "choosing" alternatives without formally Adopted founding documents to evaluate alternatives?

The Rose Quarter realignment of I-5 and I-84 in Portland Environmental Impact Statement currently taking place does not have a formally Adopted Purposed and Needs Statement and other founding documents. They only have meetings for advisory committees and have not identified the Signatory Agencies and oversight committees. The community advisory committees are still meeting only remotely why? How can they be "choosing" alternatives without formally Adopted founding documents to evaluate alternatives? (L)
http://www.nobridgetolls.com/nasset/docs/L%20%20%20P&N%20missing%20humans%20.pdf

The NEPA Process is all about records and documentation.

Please immediately provide as a Freedom Of Information Act request the formal documentation for the Columbia River Crossing, the Bridge Replacement Project, and the Rose Quarter Project with the following information. The date, time, meeting places, public notices, sign-in sheets, minutes, recordings, and agendas, for the Adoptions of Purpose and Needs Statement, problem definition, and the evaluation measures. This request is being directed to the FHWA and FTA (M)

1.
Open Meeting information
Open Meeting Laws and Freedom of Speech
By Alex Aichinger

A few quotes full article attached
"Open meeting laws, also called sunshine laws, require that, with notable exceptions, most meetings of federal and state government agencies and regulatory bodies be open to the public, along with their decisions and records ".
"Open meeting laws are a relatively new development. They ensure the public's right to access to the internal workings of government at all levels."
"What constitutes a meeting is usually defined by its purpose — to perform public business"
"All such meetings, unless specifically and legally exempted, are presumed to be open to the public, and agencies are required to give advance notice of the date, time, place, and agenda".
"It specifies that regardless of the setting, a meeting is defined by the intent and substance of the communication among public officials. If that intent is to discuss information and views or influence public business or policy, the communication becomes a meeting under the law and the provisions of the open meeting law apply." (AA)
http://www.nobridgetolls.com/nasset/docs/AA%20%20%201%20%20%20Open%20Meeting%20Laws%20and%20Freedom%20of%20Speech%20%20%20The%20First%20Amendment%20Encyclopedia.pdf

2.
Attorney General of Washington Tim Ford
"My informal opinion is that the PRC (as a governing body) is subject to WA state's Open Public Meetings Act. The OPMA requires the meeting of a governing body to be open to the public with limited exceptions as provided in RCW 42.30.110. A governing body shall provide notice of its regular and special meetings. Regular meetings of state agencies are to be filed with the Code Reviser pursuant to RCW 42.30.075. Notice of special meetings shall be provided pursuant to RCW 42.30.080. Any action taken at meetings where an agency fails to comply with the notice requirements of the OPMA shall be null and void. Sharon is alleging that the PRC didn't give proper notice of its meetings where among other actions the PRC approved the "Purpose and Needs" statement." Complete email (BB)
http://www.nobridgetolls.com/nasset/docs/BB%20WA%20%20%20ATG%20Sponor%20Council%20governing%20body%20email.pdf

3.
Washington and Oregon Departments of Transportation letter date November 6, 2006 over steps their authority and deny the Board of Clark Commissioner membership on the CRC. "Project Sponsor Council the Departments of Transportation responsible for the Columbia River Crossing project have decided not to expand the membership of the Project Sponsors Council. The membership of the Project Sponsors Council is reserved for signatories of the Record of Decision and agencies responsible for formally approving the Environmental Impact Statement." This shows CRC Project Sponsor Council knew they where required to follow Open Meetings Law. It shows the Governors and their Departments of Transportation overstepping their power in the CRC Roles and Responsibly of this EIS Process a sole CRC Signatory Agency. They did

not have the power to be the only Decision Maker concerning problems, concerns, or the direction of the CRC EIS process. FHWA was not providing oversight again. (CC)
http://www.nobridgetolls.com/nasset/docs/CC%20%203%20-Sponors%20Council%20formally%20reponsible%20for%20approval%20.pdf

4.
CRC Regional Partners Group Meeting Summary August 18, 2005
This document comments on the Project Sponsor Council several times. Under topics Process for Major Decision Points Project Sponsors Council's role includes "….and formal approval at decision point" and under Daft Purpose and Needs "…in the Problem Definition that will reviewed by the public and adopted by the Project Sponsors Council" The CRC Regional Partners Group and the Project Sponsor Council are both required to follow Open Meetings Law. DD,
http://www.nobridgetolls.com/nasset/docs/DD%20%20%20113%20%20Mtg-2005-08-18-1.pdf
EE
http://www.nobridgetolls.com/nasset/docs/EE%20%20%20%20Project%20Sponsor%20Council%20Members%20.pdf

5.
Project Sponsor Council Meeting Summary November 7, 2005
Acknowledging they must follow Public notice.
Meeting Protocols
"Public notice will be given for meetings where action is scheduled on the project milestones."
"There are five consensus milestones currently anticipated for the project"
Where are the five consensus milestone meetings: Public Notice, location, dates, etc?
"No public notice will be given for other meetings, since they will be working"
All meetings with the intent to influence public policy and deliberation must take place in public according to Open Meetings Laws. Not providing public notices, to all meetings, and stating it as Meeting Protocols is appalling and violation of the Open Meetings Laws. It shows a total disrespect for citizens to have input, listen to deliberations, find out how, and who made what decisions that affect their lives and the future. (FF)
http://www.nobridgetolls.com/nasset/docs/FF%20%20%20Mtg-2005-11-07%20ACKNOWLEDGE%20PUBLIC%20NOTICE%20needed%20for%20action%20items.pdf

6.
Columbia River Crossing Management Roles September 7, 2005 states the FHWA and FTA are members of the CRC Project Sponsor Council. (GG)
http://www.nobridgetolls.com/nasset/docs/GG%20%20%20%20%20FHWA%20was%20on%20Project%20Sponsor%20Council%20responsib%20%20%202005-10-18.pdf

7.
Project Sponsor Council Adopts
Columbia River Crossing Project Management Plan Project Controls Report 1-2 for FHWA
1.4 Purpose and Need
"The Columbia River Crossing project Purpose and Need Statement was approved the Project Sponsor Council in December 2005 and is January 17, 2006." (HH)
http://www.nobridgetolls.com/nasset/docs/HH%20%20CRC%20Purpose%20and%20Needs%20Adopted%20Management%20plan...pdf

8.
Project Sponsor Council Adopts
CRC Memorandum March 15, 2006 TO: Task Force

FROM: Hal Dengerink and Henry Hewitt
SUBJECT: Evaluation Framework COPY: Doug Ficco, Rob DeGraff Task Force members
"The PSC-adopted changes and InterCEP recommendations are summarized in the table on the following pages. For your reference, the complete screening criteria list, as amended by the PSC and InterCEP, is attached, as is a letter from the Washington State Department of Archaeology and Historic Preservation, which describe the agency concerns about the cultural resource criteria." (II)
http://www.nobridgetolls.com/nasset/docs/II%20%20%20PSC%20Adopted%20%20pg55%20EJAG%202006.pdf

9.
Crossing sponsors set closed-door meeting Officials aim to resolve differences over I-5 bridge plan
http://www.columbian.com/news/2010/mar/18/crossing-sponsors-set-closeddoor-meeting/ By Erik Robinson Thursday, March 18, 2010
"The public is not welcome."
"It is not a Project Sponsors Council meeting, and it is not a lunch that is open to the public," said Mandy Putney, a spokeswoman for the bistate Columbia River Crossing project office in Vancouver.
Stuart, who had been planning to join the discussion by teleconference, late Wednesday invited a reporter to listen in.
"It is an important discussion, and the public has a right to be in on it," he said. Two decades in the works, the crossing project has arrived at a crucial juncture."

It is not a Project Sponsors Council meeting, and it is not a lunch that is open to the public," said Mandy Putney, a spokeswoman for the bistate Columbia River Crossing project office in Vancouver. *** clearly stating they knew that Project Sponsor Council meeting were required to be open to the public! (JJ)
http://www.nobridgetolls.com/nasset/docs/JJ%20%20PSC%20CLosed%20door%20meeting%20%20Paula_Hammond_sponsors_set_closed.pdf

10.
FIOA request June 17, 2011
" Please provide all information on the CRC Project Sponsor's Council from 2004 to 2008. Please provide meeting materials, meeting notes, handouts, minutes, and any other documents, including all notes on the CRC Project Sponsor Council. " KK,
http://www.nobridgetolls.com/nasset/docs/KK%20%20%20%20FOIA%20requist%20CRC%20Sponsor.pdf

11.
Flier pointing out the CRC had formal meeting LL
http://www.nobridgetolls.com/nasset/docs/LL%20Project%20Sponsor%20Council%20did%20adopt.pdf

12.
Summary of Open Meetings Law violations (MM)
http://www.nobridgetolls.com/nasset/docs/MM%20%20ABUSE%20OF%20POWER%20Purpose%20and%20Nneede%20not%20Adopted.pdf MM-(2)
http://www.nobridgetolls.com/nasset/docs/MM-(2)%20%20%20may13%20A%20short%20list%20of%20abuses%20and%20why%20outside%20intervention%20%20SENT%E2%80%A6.pdf

13.
FIOA Requested for CRC Project Sponsor Council meetings denied
Sent: Mon, Nov 7, 2011 11:50 am
Subject: PDR D00445 - Nasset - Follow-up Response to Requestor

Michael A. Williams, PE Business Manager Columbia River Crossing

"This Project Sponsors Council met eight times from mid-2005 to January 2007. The Project Sponsors Council's intent and function was advisory only. The Project Sponsors Council was not a governing body for the Columbia River Crossing project. Thus, as an advisory group, the open meetings law requirements of Oregon and Washington did not apply to this group. The CRC has provided all documents in its possession responsive to your requests CRC oversight was, and continues to be, provided by the Oregon and Washington Transportation Commissions, the governors from both states, as well as the Federal Transit Administration and Federal Highway Administration" OVERSIGHT provided by the local FHWA and FTA again pointing to the approval of this process. The also name the Transportation Commissioners of Oregon and Washington providing oversight not a Signatory Agency and have held no local hearing on the CRC process, and identify only the Governors not the other Signatory Agencies reinforcing the falsehood that the Governors are the sole Decision Makers NN
http://www.nobridgetolls.com/nasset/docs/NN%20%20%20CRC%20PSC%20was%20only%20advisory%20email%20project%20director.pdf

14.

Washington Joint Transportation Committee
Columbia River Crossing Oversight Subcommittee
Responses to Questions - Sept. 27, 2012
3. Was there a group called the Project Sponsors Council before 2008?
"A group called the Project Sponsors Council met eight times from 2005 to 2007 to reach consensus on project development. Members included elected officials and regional leaders of the project's sponsoring agencies. This group was formed by WSDOT and ODOT to advise the agencies and made no formal recommendations while it existed." (Open Meeting Laws are on all public meetings were deliberation is taking place not meeting were formal action is taken.) The idea that meetings are "back room only with government employees running the meetings for years, elected officials, current topics and paid for with tax payers dollars, is private?…. And out side of the Freedom Of Information Request the request was denied. The email continues "A second group, also known as the Project Sponsors Council, was appointed by the Washington and Oregon Governors in 2008 to advise on completion of the Final EIS, project design, project timeline, sustainable construction methods, compliance with greenhouse gas emission reduction goals and the financial plan. Their meetings resulted in recommendations to the governors, WSDOT and ODOT, which were implemented." This is a lie to the WA oversight committee that the PSC was a group and in federal document they are stated as the Decision Makers. In 2008 when the newest CRC Project Sponsor Council was restarted they could not affect the process to have alternatives and problems with the process address. They had to focus only on how to continue the flawed LPA. The second Project Sponsor Council was appointed by the Washington and Oregon Governors again they did not have the sole right to install an oversight and Decision Making committee. This is entirely against the NEPA Process to have one body in this case the Executive calling all the shots. The naming of committees as the "Governors'" (property) CRC Citizen Task Force, the "Governors'" CRC Project Sponsor Council, and the "Governors'" Departments of Transportation running the process, providing the information, data, calling all the shot and saying what the Governor "does not does not want to allow." The local FHWA and FTA don't see a problem with any of the total exclusion of regional partners, elected officials, other Signatory Agencies, oversight committee, and the citizens. EE,
http://www.nobridgetolls.com/nasset/docs/EE%20%20%20%20Project%20Sponsor%20Council%20Members%20.pdf OO
http://www.nobridgetolls.com/nasset/docs/EE%20%20%20%20Project%20Sponsor%20Council%20Members%20.pdf OO-(2) http://www.nobridgetolls.com/nasset/docs/OO%20%20%20QA92812.highlight22.pdf

15.

SW WA Regional Transportation Council (RTC) is an oversight CRC Signatory Agency
2/6/08 3:03:40 PM Pacific Standard Time From: dean.lookingbill@rtc.wa.gov
"The group met early on in the CRC Project, but was disbanded some time ago. I am sure there is some record of their meetings but you would need to get that information from the CRC team. They were responsible for all of that." PP
http://www.nobridgetolls.com/nasset/docs/PP%20%20Sponsor%20Council%20disband%20email%20RTC%20CRC%20PSA.pdf

16.
That is right the CRC Project Sponsor Council self disband the entire Council just quit. Publicly claiming they could not work with CRC staff, where not able to affect the process in providing leadership or oversight they stopped meeting. Elected officials that had been appointed by CRC Signatory Agencies in formal hearings walked off the job. The Project Sponsor Council of elected official preformed deliberation on issues that affect the public and are subject to Open Meetings Law even if action wasn't taken. Why do the CRC, WADOT, ODOT, FHWA and FTA who attended the meeting, have the meeting information, notes, and actual audio refuse to make them public? What happen to make appointed elected officials, someone who won an election, just give up and REFUSE to ever met again? The official CRC Decision Makers and oversight committee members of the largest mega project for our area give up their "power" and responsibility. Clark County Commissioner Betty Sue Morris said " it was the worst experience of her life, worst then all her years as a teacher, and all her years in the legislator."
C-TRAN - Board of Directors Meeting DATE : Tuesday, October 11, 2005 TIME : 4:45 p.m.
PLACE: C-TRAN Administrative Facility, 2425 NE 65th Avenue,
Van, WA 98661 (360-696-4494, e-mail: ctran@c-tran.com; Web site: www.c-tran.com)
1.5 STAFF REPORT
1. APPOINTMENT TO COLUMBIA RIVER CROSSING PROJECT SPONSORS COUNCIL, C-TRAN STAFF REPORT #05-032
To appoint a C-TRAN Board of Directors member to the Columbia River Crossing (CRC) Project Sponsors Council (PSC).
ACTION: That the C-TRAN Board of Directors select and appoint a C-TRAN Board Member to the Columbia River Crossing Project Sponsors Council. QQ
http://www.nobridgetolls.com/nasset/docs/QQ%20%20%20Sponsor%20Council%20appointment%20%20CTRAN%20oct_05_agenda.pdf

17.
With no Project Sponsor Council, CRC staff continued making all the decisions which is why the Locally Preferred Alternative was called "staff recommended LPA". The LPA had 138 caveats imposed by the Signatory Agency. There is no record of public hearings to satisfy the caveats or if or how the issues were resolved. RR http://www.nobridgetolls.com/nasset/docs/RR%20%20%20LPA%20138%20caveats.pdf

18.
The Project Sponsor Council refused to Adopt the Purpose and Needs Statement that staff proposed stating it was missing all the language in the I-5 Partnership Problems, Vision, and Values Statement. The lack of community, environment, and inclusiveness plus the pointing towards a specific outcome with the narrowness that did not address the entire I-5 Corridor. The Project Sponsor Council rejected the Evaluation Framework for similar reasons as the Purpose and Needs Statement.
FHWA became involved in the disrupts they sided with the CRC staff and approved the draft Purpose and Needs Statement. "The federal co-lead agencies for this project, Federal Transit Administration (FTA) and Federal Highway Administration (FHWA), **were also instrumental in the development of the project's Purpose and Need.** Appendix A provides further details, describing the agencies this project is working with and the coordination processes with this diverse group." FHWA and FTA took the Purpose and Needs

Statement away from the Project Sponsors Councils the representatives of the CRC Signatory Agencies. THAT IS NOT NORMAL AND IS ILEGAL !!!! VOIDATION OF OPEN MEETINGS LAW AND NEPA REQUIRMENTS. The local FHWA and FTA "fixed" our Purpose and Needs Statement after taking it away from the local official Decision Makers and approved it themselves without any input from anyone else. Again the FHWA and FTA sided against the Project Sponsor Councils recommendations the concerning the scope, the projects new focus on the "new" BIA, instead of the entire I-5 Corridor, non-inclusive language, etc. SS, http://www.nobridgetolls.com/nasset/docs/SS%20Purpose%20and%20Needs%20Statement%20I-5%20Partnerhsip%202002.pdf
L, http://www.nobridgetolls.com/nasset/docs/L%20%20%20P&N%20missing%20humans%20.pdf TT http://www.nobridgetolls.com/nasset/docs/TT%20%20%20CRC%20PurposeandNeedStatement.pdf TT-(2), http://www.nobridgetolls.com/nasset/docs/TT-%20(2)%20%20P&N%20missing%20humans%20.pdf TT-(3) http://www.nobridgetolls.com/nasset/docs/TT-(3)PRC%20Does%20not%20inclued%20Ports%20flier.pdf
TT-(4) http://www.nobridgetolls.com/nasset/docs/TT-(4)%20%20%20CRC%20Project%20Manager%20PUTS%20IN%20WRITING.pdf
TT-(5) http://www.nobridgetolls.com/nasset/docs/TT-(5)%20%20Ports%20no%20in%20Project%20again%20Dec%2024,%202007.pdf
TT-(6) http://www.nobridgetolls.com/nasset/docs/TT-(6)%20%20%20timeline%20Flowchart_12-05-2011-jk-3.pdf TT-(7) http://www.nobridgetolls.com/nasset/docs/TT-(7)%20%20%20order_of_EIS_FED_%20flier%20timeline.pdf
YY
http://www.nobridgetolls.com/nasset/docs/YY%20%20%20%20117%20BCRC%20PSC%20No%20Adopts.pdf YY-(2) http://www.nobridgetolls.com/nasset/docs/YY-(2)%20%20%20110%20%20missing%20infromation%20%20B.pdf
YY-(3), http://www.nobridgetolls.com/nasset/docs/YY-(3)%20%20%20119%20CRCPSC%20my%20experience%20C.pdf

19.
As a represents of the project area Washington State Senator Don Benton wrote a letter to FTA June 3, 2012 asking for oversight of the information concerning transit markets and the Portland light rail alignment. Senator Benton was a Board Member of RTC a CRC Signatory Agency with oversight, on a WA State Legislative oversight committee, and a member WA/OR CRC Joint Legislative Oversight Committee. The letter asking for verification was REFUSED, rejected, rebuffed, and given the "word salad" treatment. Why not yes, happy to show you how much this will help your constituents. Here are the numbers and data you are looking I hope they answer your questions. UU,
http://www.nobridgetolls.com/nasset/docs/UU%20%20%20BENTON%20%20CRC_Letter_to_Rogoff,_Location_concerns,_6,3,12-2.pdf
VV,
http://www.nobridgetolls.com/nasset/docs/VV%20%20Response_letter_from_FTA,_CRC%20Sen%20Benton2.pdf
WW,
http://www.nobridgetolls.com/nasset/docs/WW%20%20Person%20trips%20to%20Clark%20Co%20dis-or%20map.pdf
XX
http://www.nobridgetolls.com/nasset/docs/XX%20%20%20Employment%20center%20light%20rail%20service.pdf

20.
The I-5 Portland Vancouver Transportation and Trade Partnership EIS recommended adding additional capacity across the Columbia River road and rail. Recommendations concerning rail included to have the

BNSF rail bridge alignment with the I-5 barge channel alignment issues addressed. The Truman Hobbs Hearing clearly stated that the problem was caused by the FHWA trying to lessen the lifts on the current I-5 bridges in 1957 by the addition of a barge channel hump that was not aligned with the existing lift on the BNSF rail line. The change in alignment created one of the top ten worst water hazards in the US waterway system. Almost two decades ago when the hearings took place the FHWA was identified as the cause of the problem, and the Benefactor of a new lift that is aligned with the bridge channel. The FHWA has held us hostage so they can whine about a lift on I-5 causing congestion. The pollution, noisy, bridges safety, marine, rail, road, and congestion endured is held up by the FHWA. While when the Willamette River lift was changed took 72 hours decades ago! The FHWA has had money and time yet has not helped elected official, committees, groups, and individuals who have tried to get this issue dealt with. We hit a brick wall with the FHWA they need to pay up and take responsibility. The FHWA has a complete disconnect with having the BNSF bridge alignment taking place independent of the EIS issues of adding capacity across the Columbia River instead they have linked them. Absolutely keeping the lift as a safety issue for leverage in enforcing "FHWA OWN AGENDA". The same FHWA keeps pointing out that one of the ideas of a replacement bridge should happen when documents clearly states a supplemental or replacement bridge. The statement suggesting a possible need for a replacement was before the 2005 report stating the bridges have 60 years of life and are worth between 500,000,000 and a billion dollars. ZZ http://www.nobridgetolls.com/nasset/docs/ZZ%20%20final_recc_at_glance.pdf , ZZZ http://www.nobridgetolls.com/nasset/docs/ZZZ%20%20%20Final%20Steps%20%20Truman.%20%20final%20doc.pdf

The CRC Task Force Member wrote a letter supporting commuter rail the letter dated July 12, 2006 From the CRC Task Force Members to the Governors of Oregon and Washington, OR/WA US Senators and US Representatives.
"The CRC Task Force recommends that such a study be undertaken immediately, focusing on addressing the projected freight and inter-city passenger rail needs." CRC staff refused to study rail service on new tracks finally CRC Task Force Member sent a letter. A study of heavy rail was not done however the two previous studies recommended. The I-5 Partnership echoed what the I-5 Corridor study of 1999 stated about the train tracks in our area are over capacity and we need to study freight and passenger rail on new tracks. Third Bridge Now was accepted in to the NEPA Scoping Process as RC-14 with new heavy rail on double track from Longview WA to the Rose Quarter in Portland with feeder bus system. DDDD http://www.nobridgetolls.com/nasset/docs/DDDD%20%20%20%20Commuter%20rail%20should%20be%20studie.pdf

NEPA Process Not Followed

Thank you for asking us for information explaining our community projects and the alternative freeway bi-state corridor. Our community hosts the ports, several industrial areas, the main event center, the I-5, I-205, I-84 freeways, and several transportation corridors; Columbia Blvd. Corridor, Marine Dr, Sandy Blvd HWY-30, and Lombard Bi-Pass HWY-30. In the 1980 the I-5 freeway through our neighborhoods were rated Level Of Service F with overflow of the I-5 freeway into adjacent neighborhoods deemed unsafe. We are St Johns, North, and Northeast Portland residences and retailers. The I-84 and I-205 freeways are over capacity and send traffic streaming into our neighborhood streets finding any "way" to get around the congestion. We have a lack of infrastructure that removes needed transportation to and from our ports and industrial areas, out of our neighborhoods which business and residents identify as a problem.
In 2000 when a little yellow card came in the mail saying transportation projects are needed in your area and we are looking for citizen input I sent in a list of ideas. Some of the ideas became accepted into the NEPA EIS for the I-5 Portland Vancouver Transportation and Trade Partnership. I became the North Portland Business Association Transportation Chair, I-5 Task Force Community Forum Representative, formed the

Non- Profit Economic Transportation Alliance commonly known ask Third Bridge Now and have held dozens of community meeting in Oregon and Washington on transportation issues. The community meetings to ask what citizens think, want, why, how, and the need for infrastructure. We need a comprehensive plan dealing as a whole and the individual parts of the transportation system that is on our neighborhood streets. Thinking that taking out a solid historic bridge and putting a bridge in the same place, in the same broken system, and all the problems including that fact that the I-5 freeway and bridge are over capacity just disappears. Do not make any sense. 1999 data stated that we have fewer bridges than similarly sized metropolitan do in the US and we needed to add capacity across the Columbia River.

1.
The I-5 Portland/Vancouver Trade Corridor commonly called the I-5 Corridor has specific geographic boundaries. The transportation studies in our region have all been based on the same I-5 Corridor description. The ports, industrial area, rails, and airport are all in one area location mostly along the two rivers. The boundaries are not subjective and the staff handling the former and current processes will state locations are inside and / or outside of the I-5 Corridor knowing they are making false statements. Using those false statements to eliminate alternatives and change the process. Here is the I-5 Portland/Vancouver Trade Corridor EIS study booklet. The study took place before the I-5 Partnership. The map and description on pages 18 and 19 are exactly the same as previous studies and the Federal Register concerning this project study area. AAA, http://www.nobridgetolls.com/nasset/docs/AAA%20I-5%20Corridor%20Studycomplete%20final%20%20%20%20pg.19%20map.pdf
AAA-(2) http://www.nobridgetolls.com/nasset/docs/AAA-(2)%20%20I-5%20Corridor%20Executive%20Summary%20Reportpdf.pdf

2. Versions of the community-supported alignment has been studied as a smaller, shorter alignment in several studies and recommended for further study.
I-5 Portland/Vancouver Trade and Transportation Partnership Booklet BBB,
http://www.nobridgetolls.com/nasset/docs/BBB%20%20%20bia_findings%20complete%203.pdf BBB-(2)
http://www.nobridgetolls.com/nasset/docs/BBB-(2)%20%20I-5%20Partnership%20final%20booklet.pdf
BBB-(3) http://www.nobridgetolls.com/nasset/docs/BBB-(3)%20%20%20BIA%20description%20I-5%20and%20CRC.pdf

Option #8 West Arterial Map (CCC) http://www.nobridgetolls.com/nasset/docs/CCC%20%20%20I-5%20West%20Art%20map%20shows%20exits.pdf
#8 West summary page (DDD)
http://www.nobridgetolls.com/nasset/docs/DDD%20%20%20West%20%20Arterial%20results%20I-5%20Partnership.findingpdf.pdf
I-5 Partnership summary recommendation page (EEE)
http://www.nobridgetolls.com/nasset/docs/EEE%20%20%20final_recc_at_glance.pdf

Bridge Influence Area (BIA) booklet (FFF)
http://www.nobridgetolls.com/nasset/docs/FFF%20%20%20bia_findings%20complete%203.pdf

Option #8 West Arterial BIA map the “port to port” connection (GGG)
http://www.nobridgetolls.com/nasset/docs/GGG%20%20%20Art%20map%20nice.pdf
Option #8 West Arterial I-5 Partnership and BIA map (HHH)
http://www.nobridgetolls.com/nasset/docs/HHH%20%20BIA%20%20%20West%20art%20short%20and%20long%20f.%202pdf.pdf
I-5 Corridor and BIA maps I-5 Partnership (III) http://www.nobridgetolls.com/nasset/docs/III%20I-5%20Partnership%20Corrridor%20and%20%20BIA.pdf

BIA findings on JJJ, http://www.nobridgetolls.com/nasset/docs/JJJ%20%20BIA%20-%20I-5%20Partnereship%20data.pdf
JJJ-(2) http://www.nobridgetolls.com/nasset/docs/JJJ-(2)%20%20%20I-5%20Recomation%20and%20reasons%20-%20I-5%20Partnership%20files%20i-5partnership.021031%20www.i-5partnership.com%20reports%20reccs.highlite%20%20pdf.pdf

SW WA RTC Visioning Corridor 2008 Option # West 4 and 4A Arterial (I-4)
http://www.nobridgetolls.com/nasset/docs/I-4%20RTC%20Vissioning%20corridor%20Study%202008.pdf

CRC Co-Chair Hal Dengerink identifying the importance of the Bridge Influence Area at the CRC Joint Senators' Oversight Committee hearing. Stating that the ports are inside the Bridge Influence Area:
http://www.youtube.com/watch?v=rIEo-jF5WL8&feature=related

Summary of findings from previous studies

I-5 Partnership EIS 2002
Option #8 West Arterial
Arterial
Speed 35 MPH
Lift Yes
Stop lights Yes
Arterial 6-lanes 600-900 per lane
Managed 0-lanes 0
Heavy rail 0-track 0
LOS Capacity 48,000 vehicles daily full upon opening
Alignment length 3-mile

I-5 Partnership EIS BIA 2002
Option #8 West Arterial Short
Arterial
Speed 35 MPH
Lift Yes
Stop lights Yes
Arterial 6-lanes 600-900 per lane
Managed 0-lanes 0
Heavy rail 0-track 0
LOS Capacity 38,000 vehicles daily full upon opening
Alignment length 11/2-mile

SW WA RTC Vissioning Corridor 2008
Option #4 West Arterial Short
Arterial
Speed 35 MPH
Lift Yes
Stop lights Yes
Arterial 4-lanes 600-900 per lane
Managed 0-lanes 0
Heavy rail 0-track 0
LOS Capacity 38,000 – 46,000 vehicles daily full upon opening
Alignment length 11/2-mile

CRC official description of Bridge Influence Area KKK
http://www.nobridgetolls.com/nasset/docs/KKK%20%20%20BIA%20description%20I-5%20and%20CRC.pdf

CRC map showing I-5 Partnership Option #8 West Arterial long and short study map (LLL)
http://www.nobridgetolls.com/nasset/docs/LLL%20%20%20CRC%20I-5%20Partnership%20west%20artlong%20short.pdf

The CRC staff of professionals continually used the maps belonging to Third Bridge Now misrepresenting the alignment. This is the only map that the CRC engineers developed during the process PPP http://www.nobridgetolls.com/nasset/docs/PPP%20%20TBN%20not%20studied.Fin%20%20pdf.pdf
PPP-(2) http://www.nobridgetolls.com/nasset/docs/PPP- http://www.nobridgetolls.com/nasset/docs/PPP-(5)%20%20%20Not%20studied%20Sen%20Benton%20%2012%20letter.%20pdf.pdf2)%20%20%20RTC%20letter%20TBN%20not%20studied.pdf
PPP-(3) http://www.nobridgetolls.com/nasset/docs/PPP-(3)%20%20%20CTRAN%20letter%20about%20TBN.pdf PPP-(4)
http://www.nobridgetolls.com/nasset/wpimages/wpbba4a448_06.png PPP-(5)
http://www.nobridgetolls.com/nasset/docs/PPP-(5)%20%20%20Not%20studied%20Sen%20Benton%20%2012%20letter.%20pdf.pdf PPP-(7)
http://www.nobridgetolls.com/nasset/docs/PPP-(7)%20%20%204th%20Plain%20becoming%20major%20freight.pdf PPP-(8)
http://www.nobridgetolls.com/nasset/docs/PPP-(8)%20%20%20%20Steve%20Stuart%20letter%20explaing%20not%20studiedpdf.pdf
PPP-(9) http://www.nobridgetolls.com/nasset/wpimages/wpb351fab2_06.png PPP-(10)
http://www.nobridgetolls.com/nasset/docs/PPP-(10)%20%20%20IRP_report.pdf
PPP-(11) http://www.nobridgetolls.com/nasset/docs/PPP-(11)%20Fliers%20%20%20Yes%20a%20different%20location%20is%20what%20we%20need..pdf (12)
http://www.nobridgetolls.com/nasset/docs/PPP-(12)%20%20the%20only%20CRC%20map%20of%20RC-14.%20Description%20.2pdf.pdf
ZZZ
http://www.nobridgetolls.com/nasset/docs/ZZZ%20%20%20Final%20Steps%20%20Truman.%20%20final%20doc.pdf

Third Bridge Now Corridor Maps
Location, Alignment, Capacity

These maps belong to Third Bridge Now freeway corridor also know as Bi-State Industrial Corridor. The maps show the freeway attaching to I-5 at Mill Plain in Vancouver, west into the Port of Vancouver across to Jantzen Beach adjacent to the BNSF rail bridge, south through Swan Island, and along Smith and Bybee lakes west to Hwy-30. (AAAA)
http://www.nobridgetolls.com/nasset/docs/AAAA%20%20%20Third%20Bridge%20Orginal%20Maps.pdf
The Bi-State Industrial Corridor (BBBB).
http://www.nobridgetolls.com/nasset/docs/BBBB%20%20Bi.State%20Industrial%20Corridor%20Description.pdf

Description Third Bridge Now full project (EEEE-2) http://www.nobridgetolls.com/nasset/docs/EEEE-(2)%20Third_Bridge_Now_Report_Final-smallerPix(2)(1).pdf
Maps shows our new freeway corridor is fully multi-modal alignment starting at I-5and Mill Plain in Vancouver, crossing into Oregon and going south through Swan Island and west to HWY-30. Transit in commuter rail, buses, feeder buses, bike, and pedestrian. (CCCC,
http://www.nobridgetolls.com/nasset/docs/CCCC%20%20%20%20maps%20of%20project%20transit.pdf
CCCC-2, http://www.nobridgetolls.com/nasset/docs/CCCC-2%20%20%20Transit%20maps%20Third%20Bridge%20Maps.pdf

CCCC-3, http://www.nobridgetolls.com/nasset/docs/CCCC-2%20%20%20Transit%20maps%20Third%20Bridge%20Maps.pdf
CCCC-4, http://www.nobridgetolls.com/nasset/docs/CCCC-4%20%20I-5%20Part%20New%20Option4Spead%20rail%20map.pdf
CCCC-5 http://www.nobridgetolls.com/nasset/docs/CCCC-5%20%20%20%20I-5%20Part%20maps%20overview.pdf

Location matters: A bi-pass I-5 freeway attaching to I-5 freeway in Vancouver and in Portland, crossing the Columbia River 1-mile west of the I-5 freeway adjacent to the BNSF rail bridge the "heart of the I-5 Trade and Transportation Corridor" Connects the ports and the majority of the industrial areas of both states with a new freeway bridge and I-5 freeway bi-pass using mostly vacant publicly owned. The location 1-mile west of the airports does not have airspace or marine constraint issues.

As described by CRC A Screening page 75
5.3.4.1 RC-14 New Corridor Crossing "This crossing would accommodate freight trains, trucks, autos, bus transit, bikes/pedestrians and potentially light rail". A-6-(1) http://www.nobridgetolls.com/nasset/docs/A-6-(1)%20%20%20CRC%20decription%20of%20RC-14.pdf
BBB http://www.nobridgetolls.com/nasset/docs/BBB%20%20%20bia_findings%20complete%203.pdf

Third Bridge Now / Bi-State Industrial Corridor a new fully multi-modal freeway corridor with new heavy rail tracks from Longview WA, vehicles, buses, bikes and pedestrian capacity EEEE-(1), http://www.nobridgetolls.com/nasset/docs/EEEE-(1)%20%20Third%20Bridge%20Now%20I-305%20interchanges%20.pdf
EEEE-(2), http://www.nobridgetolls.com/nasset/docs/EEEE-(2)%20Third_Bridge_Now_Report_Final-smallerPix(2)(1).pdf
EEEE-(3) http://www.nobridgetolls.com/nasset/docs/EEEE-(3)%20Definition%20of%20%20alternatives%20being%20presented.1%20Pg.%20%20pdf.pdf

Third Bridge Now
Freeway
Speed 55 MPH
Lift No
High capacity on/off ramps Yes
Freeway 6-lanes 2000 per lane
Managed 2-lanes 2000 per lane
Heavy rail 2-track unknown
LOS Capacity 190,000-200,000 vehicles daily
Fully multi-modal bike and pedestrian
Alignment length approximately 7-miles

CRC Process

The CRC Federal Register describes the project fully, Study Area, and that All alternatives Must be studied Thoroughly benefits and impacts Thoroughly though construction and operations. A-5 http://www.nobridgetolls.com/nasset/docs/A%205%20%20%20%20CRC%20study%20area%20map.2pdf.pdf

What is in a Thorough EIS? (B-5) http://www.nobridgetolls.com/nasset/docs/B-5%20%20what%20is%20in%20a%20thorough%20EIS%20study%201%20page.pdf

Three videos including Steve Stuart and power point
https://www.youtube.com/watch?v=EdoQGGjgHv0

Original Project Scope Columbia River Crossing
Rob DeGraff is explaining the scope of the Columbia River Crossing Project to the CRC Joint Transportation of Washington and Oregon Commission hearing. Stating previous transportation studies recommend added capacity as needed across the river NOT replacement of the current bridges. This statement is consistent with the Federal Register and the CRC Study Area map. The I-5 Transportation and Trade Partnership Environmental Impact Statement.

CRC Project Manager Rob DeGraff
Rob DeGraff is addressing the Columbia River Crossing 39 Member Task Force at their second meeting in 2006. Columbia River Crossing Project is expected to analysis a Third Bridge Corridor. The question was asked about "Studying a Third Bridge Crossing." The Project Manager clearly states that the Federal Highway Administration is expecting it to be looked at and it will be brought in during NEPA Scoping. The Third Bridge Now Corridor was brought in during the Scoping EIS and was removed without being "vetted" deviation from the CRC Federal Register 2005.

Steve Stuart explaining that the "CRC" had turned into a "replacement" project and that alternative where not being studied and they should be.
Information on Third Bridge Now freeway corridor.
Three videos including Steve Stuart and power point
https://www.youtube.com/watch?v=EdoQGGjgHv0

CRC Project Sponsor Council did not want staff to splitting up the evaluation list into an A and B could cause legal challenges and uneven weighing in the study, (FFFF)
http://www.nobridgetolls.com/nasset/docs/FFFF%20A-B%20screening%20not%20split%20pg1%20extra%20info%20%20pg55%20EJAG%202006.pdf

NEW Citizen Handout "All concepts suggested during scoping must be considered. Concepts will be screened using the Evaluation Framework (Step A and Step B screening)" This statement aligns with the Federal Register and the NEPA Process requirements. **CRC staff did not follow Project Sponsor Council's directions and instead did a two step process Screening A and B.** GGGG
http://www.nobridgetolls.com/nasset/docs/GGGG%20%20and%20B%20Screening%20All.pdf
(D-5) http://www.nobridgetolls.com/nasset/docs/D-5%20%20PSC%20do%20not%20have%20two%20screening%20A%20B.pdf

Our first alternative went though the I-5 Partnership and BIA EIS and was recommended for further study from both. The crossing of the Columbia River is in the exact same location adjacent to the BNSF rail bridge. The previous maps and data from the studies clearly states the ports are inside the BIA.

CRC Co-Chair identifying the Bridge Influence Area at the CRC Joint Senators' Oversight Committee hearing. Stating that the ports are inside the Bridge Influence Area: http://www.youtube.com/watch?v=rIEo-jF5WL8&feature=related

CRC Screening A:
False statements concerning location of I-5 corridor, Bridge Influence Area, and CRC project study area.
False statements concerning R-C14 Third Bridge Now location, capacity, length, and connections to existing transportation infrastructure.
Staff used false statements concerning findings of their study

Staff removed alternatives without thoroughly studying the benefits and impact through construction and operations a requirement of all alternatives brought in during NEPA Scoping Process.

CRC Screening A Process

River Crossing RC-14
5.3.4.1 RC-14 New Corridor Crossing
Description:
This component creates a multi-modal bi-state industrial corridor next to the BNSF rail crossing west of the existing I-5 bridges. The north end would start near Mill Plain and Fourth Plain Boulevards in Vancouver and it would travel through Hayden Island connecting to Marine Drive near North Portland Road. This crossing would accommodate freight trains, trucks, autos, bus transit, bikes/pedestrians and potentially light rail. **Figure 5-16** shows this component. shows this component.

CRC Screening A Questions summary page for RC-14 AAAA
http://www.nobridgetolls.com/nasset/docs/AAAA%20%20%20Third%20Bridge%20Orginal%20Maps.pdf
A-6(1) http://www.nobridgetolls.com/nasset/docs/A-6-(1)%20%20%20CRC%20decription%20of%20RC-14.pdf
A-6-(2) http://www.nobridgetolls.com/nasset/docs/A-6-(2)%20%20%20RC-14%20A%20Screeming.pdf

Questions 1- 6 with CRC staff findings and rebuttal to the false statements. B-6
http://www.nobridgetolls.com/nasset/docs/B%206%20A%20Screening%20typed.pdf

Additional data to clarify and answer questions 1-6

Question – 1 Traffic C-6 http://www.nobridgetolls.com/nasset/docs/C-6%20%20%20Cars%20per%20hour%20on%20verus%20roads%20.pdf

Question – 2 Transit Reference attachments Senator Benton letter concerning light rail FTA refusal to do oversight concerning light rail transit service markets (UU),
http://www.nobridgetolls.com/nasset/docs/UU%20%20%20BENTON%20%20CRC_Letter_to_Rogoff,_Location_concerns,_6,3,12-2.pdf
(VV),
http://www.nobridgetolls.com/nasset/docs/VV%20%20Response_letter_from_FTA,_CRC%20Sen%20Benton2.pdf
(WW),
http://www.nobridgetolls.com/nasset/docs/WW%20%20Person%20trips%20to%20Clark%20Co%20dis-or%20map.pdf
(XX),
http://www.nobridgetolls.com/nasset/docs/XX%20%20%20Employment%20center%20light%20rail%20service.pdf
CCCC 1-5
http://www.nobridgetolls.com/nasset/docs/CCCC%20%20%20%20maps%20of%20project%20transit.pdf
CCCC-2 http://www.nobridgetolls.com/nasset/docs/CCCC-2%20%20%20Transit%20maps%20Third%20Bridge%20Maps.pdf
CCCC-3, CCCC-4 http://www.nobridgetolls.com/nasset/docs/CCCC-4%20%20I-5%20Part%20New%20Option4Spead%20rail%20map.pdf

CCCC-5 http://www.nobridgetolls.com/nasset/docs/CCCC-5%20%20%20%20I-5%20Part%20maps%20overview.pdf
(D-6), http://www.nobridgetolls.com/nasset/docs/D-6%20%20%20Person%20trips%20to%20Clark%20Co%20dis-or%20map.pdf
(F-6) http://www.nobridgetolls.com/nasset/docs/F-6%20%20%20BusTwiceAsFast.pdf

Question - 3 Freight (G-6) http://www.nobridgetolls.com/nasset/docs/G-6%20Freight%20and%20Port%20info%20Question%203.pdf

Question – 4 Safety G-(3) http://www.nobridgetolls.com/nasset/docs/G-(3)%20%20%20Baseline%20for%20retaining%20the%20I-5%20bridge%202.pdf
Baseline H-6 http://www.nobridgetolls.com/nasset/docs/H-6%20%20Baseline%20needed.pdf

Question –5 Bike and Pedestrian

Question – 6 Seismic
The CRC findings were the same and /or less then the results from the I-5 Partnership. BIA EIS of the I-5 Partnership a minor arterial capacity numbers and it was not a freeway.

The Importance of the Bridge Influence Area
The Bridge Influence Area Is Identified As Important in these Documents
CRC Federal Register
I-5 Partnership
I-5 Partnership Bridge Influence Area
CRC Purpose and Needs Statement
CRC Step A Evaluation the First 5 Question Concern the Bridge Influence Area

When the results of Screening A came out an enormous backlash about the location of the BIA and size of the BIA took place. Many of the same elected officials, citizens, and business leaders involved in the CRC process participated in the I-5 Partnership BIA only 4 years earlier in 2002. Of the first six questions asked 5 of them had to do with the Bridge Influence Area and if the alternatives were inside the BIA boundaries. Several alternatives were stated as being outside the BIA which were definitely inside the BIA and were previously studied in the original BIA study. The CRC states under their Terms and Definition the Bridge Influence Area "as identified by the Final Strategic Plan for the I-5 Transportation and Trade Partnership."

Next CRC Staff

As the uproar continued CRC staff change the language in the official CRC project purpose statement to remove all references to the Bridge Influence Area. The CRC staff also changed "their" version of the BIA map and replaced the labels with "THE Project Area"

The two Co-Chair Hal Dengerink who had been so passionate about the importance of the BIA to the ports and our economy in the previous link totally ignored the truth. The Oregon Co-Chair Henry Hewitt who participated in the I-5 Partnership and I-5 Partnership BIA also lied. I-6-(1)
http://www.nobridgetolls.com/nasset/docs/I-6-(1)%20%20%20%20BIA-%20Project%20area%20same%20map%20and%20language.pdf
I-6(2), http://www.nobridgetolls.com/nasset/docs/I-6-(2)%20%20BIA%20%20and%20study%20area%20map%20removal.pdf
I-6-(3) http://www.nobridgetolls.com/nasset/docs/I-6-(3)%20%20%20not%20a%20match%20with%20P%20and%20N.pdf

I-6-(4), http://www.nobridgetolls.com/nasset/docs/I-6-(4)%20%20%20Quitely%20redrawing%20the%20BIA%20boundaries.pdf
I –6-(5), http://www.nobridgetolls.com/nasset/docs/I-6-(5)%20%20%20BIA%20misssing.pdf
I-6-(6) http://www.nobridgetolls.com/nasset/docs/I-6-(6)%20%20CRC%20A%20BIA%20listed%20Scree.pdf
I-6-(7) http://www.nobridgetolls.com/nasset/docs/I-6-(7)%20%20%20%20importance%20of%20BIA%20to%20CRC%20(1).pdf

As the email from the Project Manager states several times we tried to establish that the ports and BNSF rail line was inside the Bridge Influence Area. He pointed out that the ports and industrials were not part of the "project area". However the Purpose and Needs Statement identified the "center of the project area to be the two-deep water ports and the transcontinental rail line" not the I-5 freeway. They stated they would only be looking at the study area and to accept our alternatives had been removed. (A-7)
http://www.nobridgetolls.com/nasset/docs/A-7%20%20CRC%20Does%20Not%20include%20Ports%20Project%20manager%20email%20%201338-2008-04-25-S.pdf
Flier (B-7) http://www.nobridgetolls.com/nasset/docs/B-7%20%20%20PRC%20Does%20not%20inclued%20Ports%20flier.pdf

The community needed to accept that the "new project area" and that the Bridge Influence Area part of the study is over.

Screen B

What is in Step B that staff left out of the first round? List B also states the citizen's advisory Task Force small "a" adopted the Problem, Vision, and Values Statement. **That is the stated responsibility of the Project Sponsor Council** not the citizen advisory task force, does that mean they had already self-disband? Remember the CRC Project Sponsor Council refused the Purpose and Needs Statement and the Evaluation Framework that CRC staff created. The FHWA /FTA stepped in and accepted it for the community against the CRC Project Sponsor Council. They forced the citizen advisory committee to "adopt" (small a for adopt in the CRC paperwork.) the Framework for the Evaluation (HHHH)
http://www.nobridgetolls.com/nasset/docs/HHHH%20%20%203B%20screening%20CRC%20process.pdf
(E-5) http://www.nobridgetolls.com/nasset/docs/E-5%20%20FTA%20questions%20concerning%20removal%20of%20projects.pdf

What's missing from Screening B that also did not make it into Screening A? The list does not include clean air, wild life, Environmental Justice, Cultural, Fish, Visual Resources, Water Quality, and noise which are all part of a what is required in a THOROUGH EIS Study.

Screening B
1. Community Livability and Human Resources
2. Mobility, Reliability, Accessibility, Congestion Reduction, and Efficiency
3. Modal Choice
4. Safety
5. Regional Economy, Freight Mobility
6. Stewardship of Natural Resources
7. Distribution of Benefits and Impacts
8. Cost Effectiveness and Financial Resources
9. Growth Management/Land Use
10. Constructability

The CRC Federal Register describes the project fully, location, previous studied, and that All alternatives Must be studied Thoroughly benefits and impacts though construction and operations. (A-5)
http://www.nobridgetolls.com/nasset/docs/A%205%20%20%20%20CRC%20study%20area%20map.2pdf.pdf
What is in a Thorough EIS? (B-5) http://www.nobridgetolls.com/nasset/docs/B-5%20%20what%20is%20in%20a%20thorough%20EIS%20study%201%20page.pdf
"all reasonable options are thoroughly considered. This involves systematic, technical analysis, and public discussion of options and their potential effects."
Then there is the CRC big slide show January 4, 2006 that states "All concepts suggested during scoping must be considered. Concepts will be screened using the Evaluation Framework (Step A and Step B Screening). (GGGG)
http://www.nobridgetolls.com/nasset/docs/GGGG%20%20and%20B%20Screening%20All.pdf

Draft Components Step A Screening Report 6-1

6. Next Steps

"In the next phase of the Alternatives Analysis, transit and river crossing components that passed through the Step A screening will be evaluated further against Step B criteria …" . Pg 86

"In Step A, a component is eliminated from further consideration if it fails (characterized as a fatal flaw) any of the questions that pertain to that component. After Step A, the remaining components will go through a second round of screening where consideration is given to how the component performs relative to other components in the same category. The Next Steps section at the end of this report briefly describes the Step B screening. Pg.15 (HHHH)
http://www.nobridgetolls.com/nasset/docs/HHHH%20%20%203B%20screening%20CRC%20process.pdf

What happen to alternatives "**ALL** Must be considered A and B", or the NEPA EIS Process, the CRC Federal Register, Oregon and Washington Context Sensitive Solutions requirements of a honest, fair, and EQUAL study process shall take place.

How Was Our Alternative Really Removed?

A Dude Got Up And Told Us To Shut Up, Set-Down, And Enjoy Being A Victim!
That Bully Had The Complete Support Of FHWA And FTA At Every Turn!
Exactly Why We Have A NEPA Process To Keep A "Dude Or Two" From Running The Show!

This is about them refusing to STUDY not construct, just study in a fair, honest, and equal process.

ArchMiller_ReplaceBridge.avi.MP4
http://www.youtube.com/watch?v=jdnbvv6Rtgg

> This video is former Vancouver Port Commissioner Arch Miller talking to the CRC Task Force advisory committee before the meeting started and elected official had shown all up yet. He is recommending in his opinion that the Third Bridge not be studied in the CRC study but be moved into the SW Washington Regional Transportation Council Visioning Corridor Study instead. The removal of the Third Bridge Corridor (RC-14) brought in during NEPA Scoping violate the NEPA EIS. The Third Bridge Corridor did not need to be removed to be in the another transportation study. Having Third Bridge studied by two different committees one Bi-state and one regional might

provide different views and questions. Commissioner Miller made a false statements on the findings of the I-5 Partnership study; the official finding are to have a Supplemental or Replacement bridge to add capacity across the Columbia River. The I-5 Partnership of 2002 recommendation took place before the 2005 I-5 bridge inspection that said the bridges have more than 60 years of life left, no restriction and are a compliment to adding infrastructure. Vancouver Port Commissioner, CRC Task Force WA Co-Chair, and with Metro Councilor's Council Member Burkholder's then agree to remove alternatives brought in during NEPA without PROCESS. They forced the Task Force Member **AN advisory committee** to remove alternatives, not following the NEPA Process, or the Federal Register's instruction of the EIS study being Thorough through construction and operations. The Port Commissioner LIED! His willingness to lie, accept staff recommendation and force the advisory Task Force was all because the Project Sponsor Council refused to go along with staff recommendations on the Purpose and Needs Statement and the Evaluation Framework. The elected officials of the Project Sponsors Council had already started their own "BOYCOTTING" of Sponsor Council meetings after months of not meeting they "self-disbanded".

The fact that an elected official would brazenly stand up and tell the official CRC Task Force and community that "HE" Thinks and What "HE" wants and what "HE" believes is that he can tell us what to do and we MUST get inline and do as we are told! Keeping information from the citizens by the government is a First Amendment violation. It is exactly what FHWA Director Cox did to us too. When he said wait for "his" agenda first…. Hide our ideas and then maybe we can have a chance to have a fair and honest process. The ideas that the community has brought forth if we are gooood, little, and obedient "citizens" AFTER HE HAS WHAT he WANTS. The Co-Chair Hal Dengerink's comments to the same CRC Task Force that "CRC staff" keeps saying was the task force that "adopted" the Evaluation Framework was appalling. The okay; everybody, "**BASICALLY**, **we are not studying a third bridge here"**. The blunt get in line, this is what is going down, period, get it, got it, good. FHWA and FTA was sitting in the room when the Vancouver Port Commissioner and the CRC Co-Chair removed the alternative RC-14 Third Bridge Now with those words. We are going to do exactly what "I WANT" because I want it, and I always get me way by abusing my power as an elected official, and making totally false statements.

That Is How Third Bridge Now Freeway Corridor RC-14 Was Removed From The CRC EIS NEPA Process!

OR/WA Joint CRC Oversight Committee Hearing at the beginning of the process.
WA Senator Benton and OR Senator Larry asking questions about a third bridge, a third corridor and that they were expecting to see at least one new "third or fourth" bridge in different location. The represents of the Port of Vancouver and the Port of Portland which are CRC Regional Partners made false statements at the hearing. First that a new corridor would cost too much so that is why we are not studying it? Without a study alignment and design how do you know the cost verse removal of the I-5 bridges? A new corridor on mostly vacant land is cheaper than a highly urbane area of private property with historic properties. He also more than implied the bridges were old and had structure issues after the reports saying no restriction and 60 years of life left had been presented at port hearings. Both ports have been involved in meetings dealing with seismic upgrades of road and rail bridges in our region regularly. The date of this link is well before a Locally Preferred Alternative had been Adopted.
http://www.youtube.com/watch?v=7fI74enogME&feature=related

RC-14 BI-STATE INDUSTRIAL CORRIDOR WAS NOT STUDIED

Confirmed by official letters signed by elected officials, from both of the Washington CRC Signatory Agencies. Letters include members of Oregon and Washington Senate and House, City Of Vancouver Council, and the Board of Clark County Commissioners. There is NO DATA consistent with RC-14 BI-State Industrial Corridor Alternative it was not vetted or studied. (PPP) http://www.nobridgetolls.com/nasset/docs/PPP-(3)%20%20%20CTRAN%20letter%20about%20TBN.pdf

1. November 15, 2010 SW Washington Regional Transportation Council *Signatory Sponsor Agency for CRC (RC-14 was not studied or vetted in the CRC EIS Process) PPP-(2) http://www.nobridgetolls.com/nasset/docs/PPP-(2)%20%20%20RTC%20letter%20TBN%20not%20studied.pdf

2. October 28, 2010 CTRAN *Signatory Sponsor Agency for CRC (RC-14 was not studied or vetted in the CRC EIS Process) PPP-(3) http://www.nobridgetolls.com/nasset/docs/PPP-(3)%20%20%20CTRAN%20letter%20about%20TBN.pdf

3. February 11, 2009 WA Senator Benton and with 12 signatures from elected official from Oregon and Washington Senate and House of Representatives, City of Vancouver and Board of Clark County Commissioners and several are members of the CRC Signatory Agencies and or oversight committees. Letter for US Rep. Earl Blumenauer concerning CRC Process (RC-14 was not studied or vetted in the CRC EIS Process) PPP-(4) http://www.nobridgetolls.com/nasset/docs/PPP-(4)%20%20%20US%20Rep.pdf PPP-(5) http://www.nobridgetolls.com/nasset/docs/PPP-(5)%20%20%20Not%20studied%20Sen%20Benton%20%2012%20letter.%20pdf.pdf

4. July 23, 2010 and again August 29, 2012 Clark County Board of Commissioners sit on *Signatory Sponsor Agency for CRC (RC-14 was not studied or vetted in the CRC EIS Process) PPP-(6) http://www.nobridgetolls.com/nasset/docs/PPP-(6)%20%20BCCC%20formal%20letter%202010%20and%202012.pdf

5. July 22, 2010 Clark County Board of Commissioners sit on *Signatory Sponsor Agency for CRC. 4th Plain being reverted back into a "residential" Hazardous Materials Truck Route. RC-14 was not studied or vetted in the CRC EIS Process and would keep trucks out of the neighborhoods between I-5 and the Port of Vancouver and Fruit Valley Rd. Industrial Area PPP-(7) http://www.nobridgetolls.com/nasset/docs/PPP-(7)%20%20%204th%20Plain%20becoming%20major%20freight.pdf

6. December 12, 2009 Clark County Commissioner Steve Stuart description email "Third Bridge" not studied a good explanation (RC-14 was not studied or vetted in the CRC EIS Process) PPP-(8) http://www.nobridgetolls.com/nasset/docs/PPP-(8)%20%20%20%20Steve%20Stuart%20letter%20explaing%20not%20studiedpdf.pdf

Summary Of The RC-14 Treamtment In The CRC Process

1. Bi-State Industrial Corridor / Third Bridge Now River Crossing 14 (RC-14)

2. During the NEPA Scoping Process for the CRC the Third Bridge Now alternative which included the realignment of I-84, and upgrades on the I-5 freeway between I-405 and the I-5 bridges became an alternative in the CRC EIS as RC-14.

3. The RC-14 was not studied alignment, size, location and capacity were incorrect in Screening A process according the CRC Signatory Agencies, and legislative oversight committee members.

4. The data provided was inaccurate and did not match up with a new freeway corridor 7-miles in length and 4-lanes capacity /in each direction, multi-modal capacity, or with the finding of previous transportation study data of minor arterials in the same location.

5. RC-14 according to the Federal Register, EIS, Oregon and Washington Context Solutions which each requires a Thorough EIS study of ALL of the alternatives brought into the process during Scoping. At the beginning on the first day we were told and in writing ALL Concepts and MUST go through a Thorough EIS study showing benefits and impacts through construction and operations. Screening A and B. Removing alternatives before going through a Thorough Environmental Impact Statement and voiding the NEPA Process requirements disqualify the project from receiving federal funding.

6. RC-14 was removed from the process going against NEPA Process after making false statements about the location of the BIA and the I-5 Corridor. The CRC also did not follow the citizen handouts that stated all alternative must go through A and B Screening.

7. Small print on page 86 of Screening A states only alternatives that passed Screening A would move on to Screening B. HHHH
http://www.nobridgetolls.com/nasset/docs/HHHH%20%20%203B%20screening%20CRC%20process.pdf

8. Screening A was unfairly weight concerning the seismic being "U" unknown and passed and the projects that did not recommend that the current bridges needed to be upgraded "F" failed. NO Baseline if the bridges are kept certain issues will be dealt with in by doing the following fill in the blank. With no project baseline for comparison of the alternatives evaluation are all over the place with both the road and transit have data that does not match with previous studies.

9. After complaints about the BIA being the wrong boundaries continued coming in from elected officials, business, and community. The CRC staff created a "project area" map and removed all language of the BIA from the project purpose statement and maps. NO JOKE they really did that! I-6-(3)
http://www.nobridgetolls.com/nasset/docs/I-6-(3)%20%20%20not%20a%20match%20with%20P%20and%20N.pdf

10. We provided staff with information from the I-5 Transportation and Trade Partnership that the BIA was I-5 Corridor wide and our "port to port connection" #8 West Arterial Short Version was recommended for further from the BIA EIS according to maps and data. They ignore it and continued with the new "project area" map without BIA which was so important that 5 of the 6 questions in Screening A in the process. CRC staff provided documents to FHWA that they accepted even though they new the information to be false.

11. The new "project area" was focused on the I-5 freeway and did not include the two-deepwater ports and the transcontinental rail line. The CRC staff changed the location in the middle of the study. IT IS IN THE CRC PURPOSE AND NEEDS STATEMENT that the ports and rail line are the center.
12. The Vancouver Port Commissioner at the presentation of Screening A, Commissioner Miller stands up and TELLS the CRC Task Force that the Third Bridge (our project) would NOT BE STUDIED in this process. The Co-Chair Hal Dengerink enforces the removal. Listen to the video of the meeting where Third Bridge was removed. At the same time the CRC staff is trying to pass off the citizen advisory committee as "decision-makers" or the small a "approved" by statements accepted the FHWA FTA in the EIS documents.

    ArchMiller_ReplaceBridge.avi.MP4http://www.youtube.com/watch?v=jdnbvv6Rtgg

12. They just ignored us and the project moved on with, we were no longer in the new "project area" staff had created.

13. The support for Third Bridge Now and other alternatives that had all been removed by CRC Staff Screening A "six questions" joined forces as the Smarter Bridge Committee. Citizen advocacy and lobbying of elected officials at all levels government local, state, and federal. We were very successful in having elected officials and committee asking for alternatives to be returned to the process and complete the NEPA Process Thorough study of benefits and impact. Unfortunately even coming from the CRC Signatory Agencies in both Oregon and Washington, CRC Regional Partners, letters signed by elected officials, and in Oregon a Budget Note was attached to ODOT budget. Which is a big deal. Still CRC staff would not add back the alternatives that were removed. Local FHWA staff has backed up CRC staff and gone against several oversight bodies in both states.

    Smart Bridge Committee News Press Conference
    http://couv.com/crc-light-rail-project/smarter-bridge-news-event

    Several elected officials from Oregon and Washington give a news conference. This video is not meant to imply that speakers are members of the concerned citizen Smarter Bridge Committee. After the Record Of Decision on the CRC non of the elected officials or bodies where willing to provide any funding and the ROD died.

    Smarter Bridge Tour version A
    http://www.youtube.com/watch?feature=player_embedded&v=70m2cYXbN9E

    SHORT VIDEO is up on the Smarter Bridge Tour version B
    http://couv.com/crc-light-rail-project/smarter-bridge-tour-pt-1

2011 Oregon Department of Transportation Budget Note required an Independent Review Panel. IRP report detailed IRP videos links CVTV videos of the CRC Independent Review Panel 2010
http://old.cityofvancouver.us/cvtv/cvtvindex.asp?section=25437&folderID=2454
Columbia River Crossing Independent Review Panel - Community Comment Session (6-1-10)
Columbia River Crossing Independent Review Panel Meeting Part 2 (6-1-10)
Columbia River Crossing Independent Review Panel Meeting Part 2 (6-2-10)
Columbia River Crossing Independent Review Panel Meeting Part 1 (6-1-10)
Columbia River Crossing Independent Review Panel Meeting Part 1 (6-2-10)
Columbia River Crossing Independent Review Panel - Community Comment Session (6-17-10)
Columbia River Crossing Independent Review Panel Meeting Part 1 (6-17-10)
Columbia River Crossing Independent Review Panel Meeting Part 2 (6-17-10)
http://old.cityofvancouver.us/cvtv/cvtvarchive2/Community_Events/2010_Events/Columbia_River_Crossing_Independent_Review_Panel_7-7-10.wmv
http://old.cityofvancouver.us/cvtv/cvtvarchive2/Community_Events/2010_Events/CRC_Independent_Review_Panel_Part_1_6-1-10.wmv
PPP-(10) http://www.nobridgetolls.com/nasset/docs/PPP-(10)%20%20%20IRP_report.pdf

14. Oregon Governor Kitzhaber call the CRC task force committees "The Governor's Task Force" and directed the process and staff which was beyond their Roles and Responsibility. The Governor was "A" Signatory Agency, not "The" Signatory Agency excluding all agencies and oversight committee from their responsibility. This dominance was totally anti NEPA and FHWA FTA went with it because the focus was the removal of the bridges and a toll the FHWA publicly known agenda.. Kitzhaber had to

leave office in disgrace and legal issues concerning CRC. Unfortunately Governor Brown had exactly the same policy and dishonest practices.

15. With none of the CRC Signatory Agency able to affect the process, Regional Partner also had no power, and CRC Project Sponsor Council self disbanding unable work with CRC staff the process continued to limp along. There are several letters stating major concerns though the entire process. I have listed a few letters from elected officials identifying problems and concerns in the first part of the report.

16. The Third Bridge Now freeway corridor affects approximately 20 properties in the entire 7-miles and all upgrades to I-5 and I-84, and upgrades to I-5 freeway are inside the Right Of Way in Oregon. Verse CRC with hundreds of pieces of property, plus bridges, roads, infrastructure removed and direct on the I-5 freeway. We can avoided direct impacts on the I-5 freeway, downtown Vancouver and uptown Vancouver yet still accomplish goals of adding capacity in crossing the Columbia River.. What type of "government" REFUSES to at the very least study alternatives with such enormous community impacts on the "staff recommended" replacement bridge project. We are talking about studying alternatives so we can avoid these horrible impacts on residential areas, the removal of at least one school, several historically protected properties, all the disruptions to families, and the community. The economic damage to our trade and transportation with of 9 to 11 years of construction on the I-5 freeway and the only alternative crossing the over capacity I-205 bridge.

17. The importance of the Multnomah County Democratic Party 2020 Platform stating to keep and maintain infrastructure when possible. The Legislative Action Items: the need for additional port to port bridges between Oregon and Washington. The platform also identified having a third bridge constructed and open before any changes are made to the I-5 freeway bridges. The importance of this document in showing support for new infrastructure road, bridges, and rails in the Portland and Vancouver area must be pointed out. CRC staff has stated in meetings that Oregon is against more "bridges" in different locations and they can't build a bridge half-way cross the Columbia River. This laugh line is untrue. Unfortunately any elected officials that ask questions about a third bridge or make statements in favor of additional bridges are publicly attacked, until they step back in line.

Multnomah County Democratic Party 2020 Platform

Article XIII. Infrastructure — Platform of the Multnomah County Democratic Party

The Preamble states several time the importance of maintaining, preserving, upgrade, reuse and recycle infrastructure as often as possible.

LEGISLATIVE ACTION ITEMS

11.

We support continuing efforts to improve intra-city transportation to address inequities and ineffectiveness in current system.

12.

We support transportation infrastructure into and out of our ports, industrial areas and employment centers that is fast, efficient, multi-modal, and environment friendly.

13.

We support port-to-port bridge connections between Oregon and Washington — at Woodland, WA to St. Helens, OR; and at Camas, WA to Troutdale, OR – in order to strengthen the economy with efficient commercial connections, and the environment with less driving and congestion.

14.

We insist that a third freeway-bridge crossing between Oregon and Washington be open and usable before any major changes or closures are made to the I-5 and I-205 freeway bridges for other than maintenance.

15.
We call on the Oregon Legislature to require advance announcements of Estimated Time of Arrival (ETA) for all marine commercial vessels needing I-5 freeway bridge lifts. Com (1)
http://www.nobridgetolls.com/nasset/docs/com%201%202020%20%20Mutl%20County%20Dem%20PlateformArticle%20XIII.pdf

Steps we have taken

The local leaders, elected officials, and several committees from the very beginning stood up for our communities and common sense against the CRC dishonest process. The local FHWA people were contacted in writing and on a face to face level with the problems and every time went against citizens and elected officials when providing oversight and helped the process to continue limping along. The local FHWA saw over a hundred newspaper articles against CRC, forums in both states lead by elected officials and citizens groups with hundreds in attendance. The Mayor's of both Portland and Vancouver in a written letter with other signatories against CRC stating they wanted change in the process immediately, being ignored. The entire Clark County Board of Commissioner was against CRC and several actively very publicly working against it. The CRC process was a slog, the EIS started as 18-months and $20-million and 7 years and $240-millions later the local FHWA signed everything was fine with the CRC process and it received the ROD over the objection of the many "community" partners.

Transportation Sectary Buttigieg was sent as a Register package of over 400 pages booklet in the US Mail. It was forwarded back to the same office that the abuse took place, with a few of the same "employees" of the FHWA /FTA that signed the original Record of Decision in 2011 to provide oversight. Differently a problem with that the mail was not addressed to them, they are the one who created the problem we currently have. The local FHWA FTA offices had already received plenty of information on problems and illegalities of the CRC process and refused to provide oversight. After a few phone calls about the package and months having passed. I received an email from the local FHWA office that had received the letter and they repeat the same word salad excuse of previous letters. I provided you the letter. So they have reaffirmed that they liked the process and the outcome and see no problems or concerns. Not one word was said about the 400+ booklet of data of false and illegal activities. There was also no answer to the Freedom Of Information Act requests made in the letters in the booklet. Letter with over 450 booklet of date. Letter 1-(1), 1-(2), 1-(3)

Included in this report is some information on the support for Third Bridge Now freeway corridors and upgrades on the I-5 freeway from the communities the I-5 freeway is placed.
Celebrate North Portland 2011 award com (7)
http://www.nobridgetolls.com/nasset/docs/com%207%20%20Awards%20-%20three.pdf
Celebrate North Portland 2017 award com (2)
http://www.nobridgetolls.com/nasset/docs/com%202%20Celebrate%20North%20Portland%202017%20Award.pdf

St Johns' Review community newspaper Aug. 26, 2005
North Portland group expresses own ideas and solutions for improving I-5 traffic, by Gayla Patten Com (3)
http://www.nobridgetolls.com/nasset/docs/com%203%20%20%20St%20Johns'%20good%20review%20copy.pdf
The Columbian newspaper Vancouver WA March 1, 2002
Selling the "Northwest Passage" by Thomas Ryll Com (4)
http://www.nobridgetolls.com/nasset/docs/com%204%20SellingTheNWPassage.pdf
The Oregonian newspaper March 1, 2002
New Northwest Passage has traffic relief in mind by Fred Leeson com (5)
http://www.nobridgetolls.com/nasset/docs/com%205%20newspaper%20nw%20passage.pdf
The Oregonian newspaper
Solution to traffic in St. Johns hits road block by Bill Stewart com (6)
http://www.nobridgetolls.com/nasset/com%206%20%20All%20side%20agree%20an%20new%20Bridge.pdf

This picture shows the I-5 freeway has a Level Of Service rating of F since the 1980's with approximately 30,000 vehicles daily cutting through the neighborhoods to avoid congestion. com (10)
http://www.nobridgetolls.com/nasset/docs/com%2010%20I-5%20full%20ramps.pdf

Impact map shows direct impacts on 14- different neighborhoods com (8)
http://www.nobridgetolls.com/nasset/docs/COM%208%20%20Pg35_from_Neighborhoods_and_Population_TechnicalReport-1.pdf

New Bridge and Freeway Corridor Into the Ports Out of the Neighborhoods com (9)
http://www.nobridgetolls.com/nasset/docs/com%209%20I-305%20Map%20into%20ports%20of%20N%20streets-R.pdf

http://www.nobridgetolls.com/nasset/docs/com%2011%20cartoon%20Inslee.pdf
http://www.nobridgetolls.com/nasset/docs/com%2012%20toll%20graph%20fuel%20vs%20tolls.pdf
http://www.nobridgetolls.com/nasset/docs/com%2013%20I-305_flyer_4._20143_-c-1-4%20%20%20fornt.pdf
http://www.nobridgetolls.com/nasset/docs/com%2014%20I-305_flyer_4.2014..._back-JK-1.%20%20%20backpdf.pdf
http://www.nobridgetolls.com/nasset/docs/Letter%201-%20(1)%20%20May%2021,%202022.%20letterdoc.pdf
http://www.nobridgetolls.com/nasset/docs/Letter%201-%20(2)%20%20may13%20A%20short%20list%20of%20abuses%20and%20why%20outside%20intervention%20%E2%80%A6.pdf

Which is better than FHWA Inspector General Horowitz was sent as a Register package of 400+ page booklet and a letter asking for oversight. He received the package October 7, 2022 yet has not acknowledged receiving the package, and has not tried to contact us. Letter 2
http://www.nobridgetolls.com/nasset/docs/10.2.2022%20Inspector%20General%20Horowitz.pdf

Were is the current Bridge Replacement Project in the process

November 2020 was the project kick-off was three years ago

All meetings are still on-line with no sign-in sheets, unable to tell how many citizens are involved and citizens are unable to show that they have participated in the process. They are also not providing meeting minutes because they are "video"

All decision making meeting take place Monday-Friday between 9-5PM

We do not have a formally Adopted Purpose and Needs Statement or Evaluation Frame

We do not have a Locally Preferred Alternative

The US Coast Guard has stated if a new bridge is put in it will need to be a lift to met current shipping needs.

The project now that three years of deliberation and the majority of the major decisions concerning the project has been made will have citizen involvement. Staff is now starting the citizen involvement meeting to let us know what "they" plan on doing to us. When you check out their web site it is missing vital information and all of the former transportation studies that where on-line in 2010 have broken links now. Why? https://www.interstatebridge.org/

We are asking that US Representative Chavez-DeRemer a member of your office in DC make an appointment to hand the US Secretary of Transportation Pete Buttigieg a letter and this report that has been made for you. We are also asking that at the time of delivery of the letters and data links a phone appointment time is made were you and US Transportation Secretary can talk and hopefully take action.

1. All new contractors, vendors and staff, local, state and federal employee as recommended in CRC Independent Review Panel 2010 to reinstate trust and integrity into the process for Constructability.
2. Provide a team to putting the alternatives and components from community into presentable form. Stating the elements with maps, and clear data for entering in the EIS study.

Sharon Nasset
503.283.9585
Sharonnasset@aol.com



You're Invited
To
Come Ride The Rails Between Portland And Vancouver

The views show industrial sanctuaries, residential neighborhoods, rivers, mountains, bridges, and a large portion of the vacant public land we want to turn into a new multi-modal freeway corridor. Amtrack runs several times daily – pick a date and we will provide you with a delightful tour.

This will give you an idea of other tours.

Smarter Bridge Tour version A
http://www.youtube.com/watch?feature=player_embedded&v=70m2cYXbN9E

SHORT VIDEO is up on the Smarter Bridge Tour version B
http://couv.com/crc-light-rail-project/smarter-bridge-tour-pt-1

Smarter Bridge Committee press conference article and video! http://couv.com/crc-light-rail-project/smarter-bridge-news-event

Mr. Steven Fischer, Bridge Program Administrator June 18, 2023
13th Coast Guard District
Waterways Management
915 2nd Avenue, Room 3510
Seattle, WA 98174

Mr. Fischer,

Good Day Sir, I am asking for clarity and your opinion on statements and recommendations I have been making concerning the Truman-Hobbs Act and the addition of a second lift in the BNSF rail bridge across the Columbia River. I am copying elected official and interested parties so we will all have the benefit of knowledge on this subject.
Thank you kindly,
Peace,
Sharon Nasset

Truman-Hobbs Act process is nearing the final steps of the process.

Here is a summary of where we are in the process.

Attached as a reference is Title 33 - Navigational and Navigable Water Chapter 1 - Coast Guard, Department of Homeland Security Subchapter J. – Bridges
Part 116 - -Alternation of Unreasonable Obstructive Bridges

The Truman –Hobbs Act Hearing process concerning the Columbia River Crossing bridges and the Burlington Northern Sa Fe rail bridge crossing started over 2 decades ago. The findings of the extensive process has at this point is yes, there is an Unreasonable Obstructive Bridge issue do to the need for a lift in the BNSF rail line in line with the Columbia River Crossing's Barge Channel. *116.01 General E - (1)*

The process has found that the hazard must be mediated with an additional second lift on the BNSF rail bridge in line with the Columbia River Crossing's Barge Channel commonly known as "the Humps".

The 1958 addition of a second Columbia River Crossing was a "twin" bridge design because the first bridge was known to be an engineering marvel of it's time. The Federal Highway Department or the Oregon and Washington Departments of Transportation at the time of the second crossing construction choose to raised the bridge(s) height creating a barge channel. The barge channel was put into lessen the need to have bridge lifts and interrupting traffic on the bridges. The benefit was for the traffic on the land and bridge only. This narrow view did not take into account the marine traffic and their safety. The addition of a second lift on the BNSF rail would have had significant benefit at that time, as it will now with less bridge lifts helping the traffic on the bridges. The FHWA- OR-WA created the navigational hazards for their benefit.

The financial analysis determined that the majority of all the benefits from removal of the hazard that the FHWA-OR-WA created, with the addition of a second lift on BNSF rail bridge was to the highway, and 95% less lift of the historically protected bridges. The marine hazard although one of the top ten worse Navigable Water hazards in the United States must seek funding from the benefactor the FHWA and not Truman-Hobbs Act funds. 116.35 Order to Alter. C

The United State Coast Guard has 116.35 (d) has ability to force compliance to pay for and remove the obstruction.

Burlington Northern Santa Fe company has several reasonable grievances concerning this issue.

In 1908 when they built the rail bridge which was first in this local the lift span followed marine standards.

In 1958 the addition of barge channels on the Columbia River Crossing created a water hazard and made their rail bridge a target and more likely to be hit.
BNSF company has been drug into decades of hearings, "conversations", and meetings about adding an additional second lift on the BNSF rail bridge to remove the water hazard that FHWA-OR-WA created, annoys them.

The current lift that lines up with the Columbia River Crossing lift must remain and be maintained at the expense of BNSF company for marine traffic height taller that the barge channel.

The addition of a second lift on the BNSF rail bridge lessens the Columbia River Crossing bridges lifts by 95% . HOWEVER BNSF rail bridge will not have less lifts.
BNSF feels having to have two lifts to accommodate the freeway is going above what is normally required.

The FHWA-OR-WA caused the problem for their benefit and an additional lift is the answer to the hazard, also benefits the FHWA-OR-WA therefore they need to pay for it in full.
The BNSF company believes the expenses and loss of revenue associated with construction need to be reimbursed

The second lift will have operations and maintenance cost associated with it. The BNSF company feels that the FHWA-OR-WA should pay for maintenance of the second lift. They feel it is unreasonable to be financially responsible for two lifts to benefit the highway traffic.

Except that the rail bridge will no longer be a target for marine traffic the only real benefit is a slightly quicker lift for rail traffic.

Current Status

The need for an Order to Alter has been established
Non-navigational benefits will require contribution from interested parties

Next Steps

Timeline for US Coast Guard

The Coast Guard needs to send the rail bridge owner "The 60-Day Letter" notifying the owner of the rail bridge that an Order to Alter will be issued.
The Coast Guard needs to send the FHWA "The 60-Day Letter" notifying them that they will be financially responsible for the necessary costs associated with the Order to Alter.
When will this happen?

The Willamette River rail bridge had a lift upgrade in the 1980's it took 72 hours. As we enter our 3rd or 4th decade of discussions on this issue please look upon this as an opportune time to finally add a second lift. It is wonderful to be a part of something that benefits all parties associated with this venture. The marine safety, safer for all the bridges, helps freeway traffic, protects the historic bridges, less noise, and air pollution from idling cars.

The elected officials local and federal are excited to see this project move forward. They are interested in expediting this situation to a quick conclusion and are willing to give the US Coast Guard any support it needs to accomplish this goal immediately. The current Oregon Senator Lew Fredrick is the Transportation

Chair and this is his district and he would love to see it done. Our US Representative Lori Chavez-DeRemer is on the House transportation committee in congress and is also very willing to help. There is a long list of elected officials who have supported this and several others who are currently in office that are willing to give support. The FHWA **has money** at this time for infrastructure that helps the environment, economy, and is basically shovel ready.

My understand from earlier US Coast Guard Hearings that the additional lift had to be in place before any changes could be made to the current Columbia River Crossings. This is meant to lessen the bridge lift during any construction or changes to the bridges. Is that true? If so then either way the bridges must be upgraded and the sooner the better for all concerned.

The I-5 Portland / Vancouver Transportation and Trade Partnership EIS of 2002 recommended updating the BNSF rail bridge lift cross the Columbia River. *

Thank you so much for your time Mr. Fischer I greatly appreciate your knowledge and help in claritying the BNSF rail bridge and the to add a second lift.

I have two other questions of clarification;

Can the US Coast Guard please require proof from an independent bridge inspection stating the Columbia River Crossing bridges need to be removed for safety issues or not?

The CRC Independent Bridge Review Panel in 2010 stated that a full and independent inspection of the bridges was necessary before any conversation about removing or replacing the bridges should even have taken place. They were appalled that over 4 years into the process that the state of the structures was not fully known. *

The I-5 Portland / Vancouver Transportation and Trade Partnership EIS of 2002 stated a need to add capacity across the Columbia River. The EIS identified that we have fewer bridges than similar sized metropolitans in the US and if we added four bridges we would still be in last place for the number of crossings. The recommendation to add capacity with a supplemental or replacement bridge was made in 2002 before the 2005 Interstate Bridges Electrical Update Project findings ***"The two bridges have a full-time crew on deck to keep the aging structures in top operation condition. … This personalized care, combined with large maintenance projects, has kept the spans healthy and free of weight restrictions. With ongoing preservation, the bridges can serve the public for another 60 years." ****

Staff performing the Environmental Impact Statement has REFUSED multiple requests from the CRC Signatory Agencies, elected officials, business leaders, and community representatives to have a full and complete independent inspection of the Columbia River Crossing bridges by a bridge company specializing in historical properties. With the most resent 2005 reports on the bridges giving them decades of serviceable life. Maintaining and preserving available infrastructure like the current bridges and adding more crossings in different locations is very important. The I-5 Portland / Vancouver Transportation and Trade Partnership EIS of 2002 stated a need to add capacity across the Columbia River not that the Columbia River Crossing needed to be demolished. The I-5 Partnership EIS stated a supplemental or replacement bridge and update the BNSF rail bridge.

Previously and current CRC staff continually make the misleading statement repeating what the Governors' "hand picked" I-5 Partnership citizen advisory task force gave as a preference "A New Bridge with light rail" NOT what the I-5 Partnership EIS recommended. The age of the bridges is not the issue, we have several bridges in our area that are older. It is the condition of the bridges and the need to stick to the FHWA and

the states of Oregon and Washington maintain and preservation of our current infrastructure when ever possible.

A justification to remove the Columbia River Crossings bridges has not been provided.
The SW Washington Regional Transportation Director Don Wagner's presentation to the Washington Transportation Commission in 2005 he stated that the bridges where in "pristine condition" and thicker than the original specification called for with; the 1917 being in the best condition.

Can the US Coast Guard please require an independent bridge company specializing in seismic retro-fitting of bridges inspection the Columbia River Crossings bridges?

A company that specializes in seismic retro-fitting has NOT evaluated or made recommendations concerning the Columbia River Crossings. This finding in 2010 by the Independent Review Panel shocked them. They found it unacceptable that the previous transportation studies stated the bridges could be seismically retro-fit for approximately $50-million and now CRC staff was saying $650-million. Without a company that specializes in seismic retro-fitting of bridges providing the different levels how did staff go from $50-million to $650-million? The CRC Independent Bridge Review Panel stating not having an actual Request For Proposal concerning the seismic needs of the bridges was unprofessional. That having a "meeting" with engineers that deal with seismic on buildings not bridges did not come close to dealing with the issues of upgrading a bridge and the work they showed on the CRC web site was beyond misleading it is embarrassing.

The Independent Bridge Review Panel pointed out a major concern the Columbia River Crossings a solid steel bridge, a l-mile long, a massive amount of weight, might stay in one piece and become un-moored. The bridges loose smashing into levies, ports, downtown Vancouver, going up or down river reeking havoc and causing major damage to infrastructure. They recommended staff immediately have a seismic bridge company evaluated, to study alternative, and investigate the bridge self-detaching a decade has passed without any action.

Beware…. The same staff that started in 2005 with an 18-month $20-million EIS. Eight years later over $240-million with a Locally Preferred Alternative everyone hated. The project was so awful that the FEIS could not raise $1 in support federal, state, local, or private funding and died. Staff states that it will be **at least** 9-11 years of construction on I-5 and over the river disturbing marine traffic.

So again Sir, please help us understand what is happening with the BNSF rail bridge and the addition of a second lift. If the US Coast Guard or the US Army Corp of Engineers would please require a full independent inspection of the current Columbia River Crossing bridges showing if it needs to be replaced. Please complete seismic evaluation by a company specializing in bridges. Easy stuff.

Peace,
Sharon

Mr. Steven Fischer, Bridge Program Administrator June 18, 2023
13th Coast Guard District
Waterways Management

Attached as a reference

Title 33 - Navigational and Navigable Water Chapter 1 - Coast Guard, Department of Homeland Security Subchapter J. – Bridges
Part 116 - -Alternation of Unreasonable Obstructive Bridges
https://www.ecfr.gov/current/title-33/chapter-I/subchapter-J/part-116 (and link)

"If a proposed alteration to a bridge has desirable, non-navigational benefits, the Chief, Office of Bridge Programs may require an equitable contribution from any interested person, firm, association, corporation, municipality, county, or state benefiting from the alteration as a prerequisite to the making of an Order to Alter for that alteration".

2. I-5 Portland /Vancouver Transportation and Trade Partnership 2002 - Finding At A Glance "fix" the BNSF rail bridge lift issue and add more capacity.

3. Federal Register /Vol. 70, No. 186 /Tuesday, September 27, 2005 /Notices 56523 for the CRC Environmental Impact Statement

4. 2005 Interstate Bridges Electrical Update Project findings (Columbia River Crossings)
"The two bridges have a full-time crew on deck to keep the aging structures in top operation condition. … This personalized care, combined with large maintenance projects, has kept the spans healthy and free of weight restrictions. With ongoing preservation, the bridges can serve the public for another 60 years."

5. I-5 Partnership 2002 graph fewer bridges than similar sized metropolitan

6. CRC Independent Review Panel 2010 video links. Here are the links the first one has the statements.
CVTV videos of the CRC Independent Review Panel 2010
http://old.cityofvancouver.us/cvtv/cvtvindex.asp?section=25437&folderID=2454
Columbia River Crossing Independent Review Panel - Community Comment Session (6-1-10)
Columbia River Crossing Independent Review Panel Meeting Part 2 (6-1-10)
Columbia River Crossing Independent Review Panel Meeting Part 2 (6-2-10)
Columbia River Crossing Independent Review Panel Meeting Part 1 (6-1-10)
Columbia River Crossing Independent Review Panel Meeting Part 1 (6-2-10)
Columbia River Crossing Independent Review Panel - Community Comment Session (6-17-10)
Columbia River Crossing Independent Review Panel Meeting Part 1 (6-17-10)
Columbia River Crossing Independent Review Panel Meeting Part 2 (6-17-10)
http://old.cityofvancouver.us/cvtv/cvtvarchive2/Community_Events/2010_Events/Columbia_River_Crossing_Independent_Review_Panel_7-7-10.wmv
http://old.cityofvancouver.us/cvtv/cvtvarchive2/Community_Events/2010_Events/CRC_Independent_Review_Panel_Part_1_6-1-10.wmv
http://old.cityofvancouver.us/cvtv/cvtvarchive2/Community_Events/2010_Events/CRC_Independent_Review_Panel_Meeting_Part_2_6-1-10.wmv

Joint OR/WA Transportation Commissioners' Hearing presentation Original CRC EIS Scope
https://www.youtube.com/watch?v=EdoQGGjgHv0
Smarter Bridge Committee press conference article and video
http://couv.com/crc-light-rail-project/smarter-bridge-news-event

This content is from the eCFR and is authoritative but unofficial.

Displaying title 33, up to date as of 5/24/2023. Title 33 was last amended 5/23/2023.

Title 33 —Navigation and Navigable Waters
Chapter I —Coast Guard, Department of Homeland Security
Subchapter J —Bridges

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PART 116—ALTERATION OF UNREASONABLY OBSTRUCTIVE BRIDGES

Authority: 33 U.S.C. 401, 521.

Source: CGD 91–063, 60 FR 20902, Apr. 28, 1995, unless otherwise noted.

EDITORIAL NOTE

Editorial Note: Nomenclature changes to part 116 appear by USCG–2008–0179, 73 FR 35012, June 19, 2008 and USCG–2010–0351, 75 FR 49410, Aug. 13, 2010.

§ 116.01 General.

(a) All bridges are obstructions to navigation and are tolerated only as long as they serve the needs of land transportation while allowing for the reasonable needs of navigation.

(b) This part describes the general procedures by which the U.S. Coast Guard determines a bridge to be an unreasonable obstruction to navigation and issues an Order to Alter under the authority of

the following statutes, as appropriate: Section 18 of the Rivers and Harbors Appropriations Act of 1899, 33 U.S.C. 502; Section 4 of the Bridge Act of 1906, 33 U.S.C. 494; or the Truman-Hobbs Act of 1940, as amended, 33 U.S.C. 511–524.

(c) A bridge constructed across a navigable water of the United States shall not unreasonably obstruct the free navigation of the water over which it was constructed, either due to insufficient height or width of the navigation span, or because of difficulty in passing through the draw opening. If any bridge unreasonably obstructs navigation, the Commandant, U.S. Coast Guard, will order the alteration of that bridge. Alterations may include structural changes, replacement, or removal of the bridge.

(d) Whenever the Coast Guard has good reason to believe that a bridge across any of the navigable waters of the United States is an unreasonable obstruction to navigation, the Coast Guard will give notice to the owner of the bridge and other interested parties, and hold a public meeting at which the interested parties will have a full opportunity to be heard and to provide information on the question of whether alterations to the bridge are necessary and, if so, the extent of alterations needed.

(e) If the Coast Guard determines that alterations to a bridge are necessary, the Commandant, U.S. Coast Guard, will issue to the bridge owner an Order to Alter containing details of the alterations necessary to render navigation through or under the bridge reasonably free, easy, and unobstructed.

(1) In the case of a railroad or publicly owned highway bridge, an Order to Alter is issued to the bridge owner under the provisions of the Truman-Hobbs Act (33 U.S.C. 511 *et seq.*). In ordering these alterations, the Coast Guard will give due regard to the necessities of free and unobstructed navigation and of rail and highway traffic. For alterations to bridges governed by the Truman-Hobbs Act, the Coast Guard must approve general plans, specifications, and contracts for the alteration project, as well as approving the apportionment of the total cost of the alterations between the United States and the bridge owner.

(2) For all other bridges, the Order to Alter will contain the required alterations for the bridge and will prescribe a reasonable time in which to accomplish the required alterations. The bridge owner is responsible for the entire cost of the required alterations.

[CGD 91–063, 60 FR 20902, Apr. 28, 1995, as amended by USCG–2010–0351, 75 FR 49410, Aug. 13, 2010]

§ 116.05 Complaints.

Any person, company, or other entity may submit to the District Commander of the Coast Guard district in which a bridge over a navigable water of the United States is located, a complaint that a bridge unreasonably obstructs navigation. The complaint must be in writing and include specific details to support the allegation.

§ 116.10 Preliminary review.

(a) Upon receipt of a written complaint, the District Commander will review the complaint to determine if, in the District Commander's opinion, the complaint is justified and whether a Preliminary Investigation is warranted.

(1) The District Commander's opinion as to whether or not the complaint warrants a Preliminary Investigation will be formed through informal discussions with the complainant, users of the affected waterway, the owner of the bridge, and other interested

parties.

(2) In forming an opinion, the District Commander may also review the district files, records of accidents, and details of any additional written complaints associated with the bridge in question.

(b) In the absence of any written complaint, the District Commander may decide, based on a bridge's accident history or other criteria, to conduct a Preliminary Investigation.

(c) The District Commander will inform the complainant and the Chief, Office of Bridge Programs of the determination of any Preliminary Review. If the District Commander decides that the bridge in question is not an unreasonable obstruction to navigation, the complainant will be provided with a brief summary of the information on which the District Commander based the decision and will be informed of the appeal process described in § 116.55. There will be no further investigation, unless additional information warrants a continuance or reopening of the case.

[CGD 91–063, 60 FR 20902, Apr. 28, 1995, as amended by CGD 96–026, 61 FR 33663, June 28, 1996; USCG–2013–0397, 78 FR 39174, July 1, 2013]

§ 116.15 Preliminary investigation.

(a) During the Preliminary Investigation, the District Commander will prepare a written report containing all pertinent information and submit the report, together with a recommendation for or against the necessity of a Detailed Investigation, to the Chief, Office of Bridge Programs.

(b) The Preliminary Investigation Report will include a description of the nature and extent of the obstruction, the alterations to the bridge believed necessary to meet the reasonable needs of existing and future navigation, the type and volume of waterway traffic, and a calculation of the benefits to navigation which would result from the proposed bridge alterations.

(c) The Chief, Office of Bridge Programs will review the Preliminary Investigation Report and make a Preliminary Decision whether or not to undertake a Detailed Investigation and a Public Meeting.

(d) If after reviewing the Preliminary Investigation Report, the Chief, Office of Bridge Programs decides that further investigation is not warranted, the complainant will be notified of the decision. This notification will include a brief summary of information on which the decision was based and details of the appeal process described in § 116.55.

[CGD 91–063, 60 FR 20902, Apr. 28, 1995, as amended by CGD 96–026, 61 FR 33663, June 28, 1996; USCG–2012–0306, 77 FR 37314, June 21, 2012; USCG–2013–0397, 78 FR 39174, July 1, 2013; USCG–2014–0410, 79 FR 38433, July 7, 2014]

§ 116.20 Detailed investigation.

(a) When the Chief, Office of Bridge Programs determines that a Detailed Investigation should be conducted, the District Commander will initiate an investigation that addresses all of the pertinent data regarding the bridge, including information obtained at a public meeting held under § 116.25. As part of the investigation, the District Commander will develop a comprehensive report, termed the “Detailed Investigation Report”, which will discuss: the obstructive character of the bridge in question; the impact of that bridge upon navigation; navigational benefits derived; whether an alteration is needed to meet the needs of navigation; and, if alteration is recommended, what type.

(b) The District Commander will forward the completed Detailed Investigation Report to the Chief,

Office of Bridge Programs for review together with a recommendation of whether the bridge should be declared an unreasonable obstruction to navigation and, if so, whether an Order to Alter should be issued.

[CGD 91–063, 60 FR 20902, Apr. 28, 1995, as amended by CGD 96–026, 61 FR 33663, June 28, 1996; USCG–2013–0397, 78 FR 39174, July 1, 2013]

§ 116.25 Public meetings.

(a) Any time the Chief, Office of Bridge Programs determines that a Detailed Investigation is warranted, or when Congress declares a bridge unreasonably obstructive, the District Commander will hold a public meeting near the location of the bridge to provide the bridge owner, waterway users, and other interested parties the opportunity to offer evidence and be heard, orally or in writing, as to whether any alterations are necessary to provide reasonably free, safe, and unobstructed passage for waterborne traffic. The District Commander will issue a public notice announcing the public meeting stating the time, date, and place of the meeting.

(b) When a bridge is statutorily determined to be an unreasonable obstruction, the scope of the meeting will be to determine what navigation clearances are needed.

(c) In all other cases, the scope of the meeting will be to address issues bearing on the question of whether the bridge is an unreasonable obstruction to navigation and, if so, what alterations are needed.

(d) The meeting will be recorded. Copies of the public meeting transcript will be available for purchase from the recording service.

[CGD 91–063, 60 FR 20902, Apr. 28, 1995, as amended by CGD 96–026, 61 FR 33664, June 28, 1996; USCG–2013–0397, 78 FR 39174, July 1, 2013]

§ 116.30 Chief, Office of Bridge Programs Review and Evaluation.

(a) Upon receiving a Detailed Investigation Report from a District Commander, the Chief, Office of Bridge Programs will review all the information and make a final determination of whether or not the bridge is an unreasonable obstruction to navigation and, if so, whether to issue an Order to Alter. This determination will be accompanied by a supporting written Decision Analysis which will include a Benefit/Cost Analysis, including calculation of a Benefit/Cost Ratio.

(b) The Benefit/Cost ratio is calculated by dividing the annualized navigation benefit of the proposed bridge alteration by the annualized government share of the cost of the alteration.

(c) Except for a bridge which is statutorily determined to be an unreasonable obstruction, an Order to Alter will not be issued under the Truman-Hobbs Act unless the ratio is at least 1:1.

(d) If a bridge is statutorily determined to unreasonably obstruct navigation, the Chief, Office of Bridge Programs will prepare a Decision Analysis to document and provide details of the required vertical and horizontal clearances and the reasons alterations are necessary.

(e) If the Chief, Office of Bridge Programs decides to recommend that the Commandant issue an Order to Alter, or a bridge is statutorily determined to unreasonably obstruct navigation, the Chief, Office of Bridge Programs will issue a letter to the bridge owner (“The 60-Day Letter”) at least 60 days before the Commandant issues an Order to Alter. This letter will contain the reasons an alteration is necessary, the proposed alteration, and, in the case of a Truman-Hobbs bridge, an estimate of the total project cost and the bridge owner's share.

(f) If the bridge owner does not agree with the terms proposed in the 60-Day Letter, the owner may request a reevaluation of the terms. The request for a reevaluation must be in writing, and identify the terms for which reevaluation is requested. The request may provide additional information not previously presented.

(g) Upon receipt of the bridge owner's response, the Chief, Office of Bridge Programs will reevaluate the situation based on the additional information submitted by the bridge owner. If after the Chief, Office of Bridge Programs reviews the determination, there is no change, the Commandant may issue an Order to Alter as set out in § 116.35. The Administrator, Office of Bridge Programs determination based on the reevaluation will constitute final agency action.

[CGD 91–063, 60 FR 20902, Apr. 28, 1995, as amended by CGD 96–026, 61 FR 33664, June 28, 1996; USCG–2013–0397, 78 FR 39174, July 1, 2013]

§ 116.35 Order to Alter.

(a) If the bridge owner agrees with the contents of the 60-Day Letter, if no reply is received by 60 days after the issuance of the letter, or if after reevaluation a bridge is determined to be an unreasonable obstruction to navigation, the Commandant will issue an Order to Alter.

(1) If a bridge is eligible for funding under the Truman-Hobbs Act, the Order to Alter will specify the navigational clearances to be accomplished in order to meet the reasonable needs of navigation.

(2) An Order to Alter for a bridge that is not eligible for Truman-Hobbs funding will specify the navigational clearances that are required to meet the reasonable needs of navigation and will prescribe a reasonable time in which to accomplish them.

(b) If appropriate, the Order to Alter will be accompanied by a letter of special conditions setting forth safeguards needed to protect the environment or to provide for any special needs of navigation.

(c) If a proposed alteration to a bridge has desirable, non-navigational benefits, the Chief, Office of Bridge Programs may require an equitable contribution from any interested person, firm, association, corporation, municipality, county, or state benefiting from the alteration as a prerequisite to the making of an Order to Alter for that alteration.

(d) Failure to comply with any Order to Alter issued under the provisions of this part will subject the owner or controller of the bridge to the penalties prescribed in 33 U.S.C. 495, 502, 519, or any other applicable provision.

[CGD 91–063, 60 FR 20902, Apr. 28, 1995, as amended by CGD 96–026, 61 FR 33664, June 28, 1996; USCG–2013–0397, 78 FR 39174, July 1, 2013]

§ 116.40 Plans and specifications under the Truman-Hobbs Act.

(a) After an Order to Alter has been issued to a bridge owner under the Truman-Hobbs Act, the Chief, Office of Bridge Programs will issue a letter to the bridge owner outlining the owner's responsibilities to submit plans and specifications to the Chief, Office of Bridge Programs for the alteration of the bridge. The plans and specifications, at a minimum, must provide for the clearances identified in the Order to Alter. The plans and specifications may also include any other additional alteration to the bridge that the owner considers desirable to meet the requirements of railroad or highway traffic. During the alteration process, balanced consideration shall be given to the needs of rail, highway, and marine traffic.

(b) The Chief, Office of Bridge Programs will approve or reject the plans and specifications submitted by the bridge owner, in whole or in part, and may require the submission of new or additional plans and specifications.

(c) When Chief, Office of Bridge Programs has approved the submitted plans and specifications, they are final and binding upon all parties, unless later changes are approved by the Chief, Office of Bridge Programs. Any changes to the approved plans will be coordinated with the District Commander.

[CGD 91–063, 60 FR 20902, Apr. 28, 1995, as amended by CGD 96–026, 61 FR 33664, June 28, 1996; USCG–2013–0397, 78 FR 39174, July 1, 2013]

§ 116.45 Submission of bids, approval of award, guaranty of cost, and partial payments for bridges eligible for funding under the Truman-Hobbs Act.

(a) Once the plans and specifications for a bridge eligible for funding under the Truman-Hobbs Act have been approved, the bridge owner must take bids for the alteration of the bridge consistent with the approved plans and specifications. Those bids must then be submitted to the Chief, Office of Bridge Programs for approval.

(b) After the bridge owner submits the guaranty of cost required by 33 U.S.C. 515, the Chief, Office of Bridge Programs authorizes the owner to award the contract.

(c) Partial payments of the government's costs are authorized as the work progresses to the extent that funds have been appropriated.

[CGD 91–063, 60 FR 20902, Apr. 28, 1995, as amended by CGD 96–026, 61 FR 33664, June 28, 1996; USCG–2013–0397, 78 FR 39174, July 1, 2013; USCG–2014–0410, 79 FR 38433, July 7, 2014]

§ 116.50 Apportionment of costs under the Truman-Hobbs Act.

(a) In determining the apportionment of costs, the bridge owner must bear such part of the cost attributable to the direct and special benefits which will accrue to the bridge owner as a result of alteration to the bridge, including expected savings in repairs and maintenance, expected increased carrying capacity, costs attributable to the requirements of highway and railroad traffic, and actual capital costs of the used service life. The United States will bear the balance of the costs, including that part attributable to the necessities of navigation.

(b) “Direct and special benefits” ordinarily will include items desired by the owner but which have no counterpart or are of higher quality than similar items in the bridge prior to alteration. Examples include improved signal and fender systems, pro rata share of dismantling costs, and improvements included, but not required, in the interests of navigation.

(c) During the development of the Apportionment of Costs, the bridge owner will be provided with an opportunity to be heard. Proportionate shares of cost to be borne by the United States and the bridge owner are developed in substantially the following form:

> Total cost of project _____ $_____
> Less salvage ____ $____
> Less contribution by third party ____ $____
> Cost of alteration to be apportioned
> ____ $____
> Share to be borne by the bridge owner:

Direct and Special Benefits:
a. Removing old bridge ____ $____
b. Fixed charges ____ $____
c. Betterments ____ $____
Expected savings in repair or maintenance costs:
a. Repair ____ $____
b. Maintenance ____ $____
Costs attributable to requirements of railroad and/or highway traffic ____ $____
Expenditure for increased carrying capacity ____ $____
Expired service life of old bridge ____ $____
Subtotal ____ $____
Share to be borne by the bridge owner
____ $____
Contingencies ____ $____
Total ____ $____
Share to be borne by the United States
____ $____
Contingencies ____ $____
Total ____ $____

(d) The Order of Apportionment of Costs will include the guaranty of costs.

§ 116.55 Appeals.

(a) Except for the decision to issue an Order to Alter, if a complainant disagrees with a recommendation regarding obstruction or eligibility made by a District Commander, or the Chief, Office of Bridge Programs, the complainant may appeal that decision to the Deputy Commandant for Operations.

(b) The appeal must be submitted in writing to the Commandant (CG–DCO–D), Attn: Deputy for Operations Policy and Capabilities, U.S. Coast Guard Stop 7318, 2703 Martin Luther King Jr. Avenue SE., Washington, DC 20593–7318, within 60 days after the District Commander's or the Chief, Office of Bridge Programs decision. The Deputy Commandant for Operations will make a decision on the appeal within 90 days after receipt of the appeal. The Deputy Commandant of Operations' decision of this appeal shall constitute final agency action.

(c) Any Order of Apportionment made or issued under section 6 of the Truman-Hobbs Act, 33 U.S.C. 516, may be reviewed by the Court of Appeals for any judicial circuit in which the bridge in question is wholly or partly located, if a petition for review is filed within 90 days after the date of issuance of the order. The review is described in section 10 of the Truman-Hobbs Act, 33 U.S.C. 520. The review proceedings do not operate as a stay of any order issued under the Truman-Hobbs Act, other than an order of apportionment, nor relieve any bridge owner of any liability or penalty under other provisions of that act.

[CGD 91–063, 60 FR 20902, Apr. 28, 1995, as amended by CGD 96–026, 61 FR 33663, June 28, 1996; CGD 97–023, 62 FR 33363, June 19, 1997; USCG–2008–0179, 73 FR 35013, June 19, 2008; USCG–2010–0351, 75 FR 36283, June 25, 2010; USCG–2013–0397, 78 FR 39174, July 1, 2013; USCG–2014–0410, 79 FR 38433, July 7, 2014]

Index Attachments and Electronic Links

Mural Linnton Community Center Cover #1 attachment

Intro letter Opportunity Knocks #2 attachment

Martin Luther King JR's Quote #3 attachment

Summary

Columbia River Crossing(s) the I-5 Bridge condition from 2005 with Oregon State Seal
http://www.nobridgetolls.com/nasset/docs/H-(1)%20%20Bridge%20cond%20of%20I-5%20freeway%202005.JPG.pdf

Social Injustice and Lack of Process Report Summary (3-pgs) #4 attachment

Request For Action

Immediate Action is Requested (3-pgs) #5 attachment

Picture showing I-5 Freeway 1-mile south of the I-5 bridges is over-capacity
http://www.nobridgetolls.com/nasset/docs/com%2010%20I-5%20full%20ramps.pdf

Community Support

Location, Location, Location (2-pgs) #6 attachment

Into the Ports and Out of the Neighborhoods with a new freeway corridor
http://www.nobridgetolls.com/nasset/docs/com%209%20I-305%20Map%20into%20ports%20of%20N%20streets-R.pdf

Traffic Average Daily Total map showing inhuman freight traffic levels
http://www.nobridgetolls.com/nasset/docs/G-5%20%20%20R2011.0328_Third_Bridge_Now_Report_Final-smallerPix(2)%20pg11%20and%2022maps.pdf%20%20f.pdf

Third Bridge Now Multi-modal map link.
https://www.youtube.com/watch?v=nzaMpNR-Wj8&t=1006s

Celebrate North Portland 2011 and 2017 (3-pags)
http://www.nobridgetolls.com/nasset/docs/com%207%20%20Awards%20-%20three.pdf

Picture of one community of three meetings held by community members. #7 attachment

Vacant land Far Less Impacts In Primary Area Of Potential Impacts than I-5 construction #8 attachment

Solution to truck traffic in St. Johns hit roadblocks
http://www.nobridgetolls.com/nasset/docs/com%206%20%20All%20side%20agree%20an%20new%20Bridge-L.pdf

St Johns' Review http://www.nobridgetolls.com/nasset/docs/com%205%20newspaper%20nw%20passage.pdf

New Northwest Passage has traffic relief in mind
http://www.nobridgetolls.com/nasset/docs/com%205%20newspaper%20nw%20passage.pdf

Multnomah County Democrat Platform 2020 Infrastructure calling for additional bridges first (6pgs)
http://www.nobridgetolls.com/nasset/docs/com%201%202020%20%20Mutl%20County%20Dem%20PlateformArticle%20XIII.pdf

Third Bridge Now brochure (Pgs.2)
http://www.nobridgetolls.com/nasset/docs/com%2013%20I-305_flyer_4._20143_-c-1-4%20%20%20fornt.pdf
http://www.nobridgetolls.com/nasset/docs/com%2014%20I-305_flyer_4.2014... back-JK-1.%20%20%20backpdf.pdf

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U.S. Coast Guard and FHWA to move forward on the addition of a second lift on the BNSF rail bridge benefiting the environment and highway and marine safety. (pgs-5) Report #12 attachment

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Federal Register CRC
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http://www.nobridgetolls.com/nasset/docs/I%20-(2)%20%20%20fed%20reg%20with%20boxes%20and%20arrows-2.pdf

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Link web site for CRC data
http://www.nobridgetolls.com/nasset/

IBR Draft SEIS - RECORD #3681 DETAIL

First Name :	Thomas
Last Name :	Karwaki
Attachments :	DSEIS-3681_Karwaki_Original.pdf (3 kb)

IBR Draft SEIS - RECORD #3681 DETAIL

Submission Date :	11/19/2024
First Name :	Thomas
Last Name :	Karwaki
Business/Organization/Agency :	University Park Neighborhood Association Board

Submission Input :

The UPNA Board requests that additional analysis of the impacts on health of the cyclists and pedestrians (heat will exceed 100F) be done for summer conditions. Also the proximity of the cyclists and pedestrians for air pollution and noise should be studied as well.

Thomas KarwakiChair, University Park Neighborhood Association

[redacted]

IBR Draft SEIS - RECORD #3682 DETAIL

First Name :	Sharon
Last Name :	Nasset
Attachments :	DSEIS-3682_Nasset_Original.pdf (4 mb) Index Attachments and electronic links.pdf (21 kb) #1 -Never Doubt pic.pdf (1 mb) #2 Opportunity Knock. Intro doc.pdf (11 kb) #3 Dr.King quote.pdf (21 kb) #4 The I-5 Bridges are Pristinee Full April 2024 .pdf (25 kb) #5 Secretary Pete ButtigiegOct- request 2023 .pdf (3 mb) #6 Location, Location, Location.pdf (25 kb) #4 The I-5 Bridges are Pristinee Full April 2024 .pdf (25 kb)

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First Name :	Sharon
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Submission Input :

[----- Forwarded Message ----- From: Sharonnasset [redacted]>To: [redacted]Sent: Friday, November 15, 2024 at 07:20:13 AM PSTSubject: Fw: Electronic copy of Booklet of issues concerning the Columbia River I-5 Bridge project for Secretary Buttigieg 1 of 2 emails

----- Forwarded Message ----- From: Sharonnasset[redacted]To: [redacted]Sent: Wednesday, May 1, 2024 at 12:42:32 PM PDTSubject: Fw: Electronic copy of Booklet of issues concerning the Columbia River I-5 Bridge project for Secretary Buttigieg 1 of 2 emails

----- Forwarded Message ----- From: Sharonnasset[redacted]Sent: Wednesday, May 1, 2024, 12:22:11 PM PDTSubject: Electronic copy of Booklet of issues concerning the Columbia River I-5 Bridge project for Secretary Buttigieg 1 of 2 emails

Thank you very much for your help in delivering our information to Secretary Buttigieg personally. The layers between the Secretary and citizens is very thick. We have been trying for over two years to send this information to Secretary Buttigieg. We believe he will take action to provide a fair and honest process. Our community is excited to have a Transportation Secretary aware of Environmental Justice and committed to having community involvement. Since the 1980's the I-5 freeway that cuts through our community has had Level Of Service rating of "F", with thousands of vehicle daily overflowing into the adjacent residential neighborhood streets, We live here and want our ideas fully, equally, and thoroughly studied. With great appreciate thank you, for your help in reaching our Transportation Secretary we desperately need his help.
Peace,
Sharon Nasset
[redacted]

Index Attachments and Electronic Links

Mural Linnton Community Center Cover #1 attachment

Intro letter Opportunity Knocks #2 attachment

Martin Luther King JR's Quote #3 attachment

Summary

Columbia River Crossing(s) the I-5 Bridge condition from 2005 with Oregon State Seal
http://www.nobridgetolls.com/nasset/docs/H-(1)%20%20Bridge%20cond%20of%20I-5%20freeway%202005.JPG.pdf

Social Injustice and Lack of Process Report Summary (3-pgs) #4 attachment

Request For Action

Immediate Action is Requested (3-pgs) #5 attachment

Picture showing I-5 Freeway 1-mile south of the I-5 bridges is over-capacity
http://www.nobridgetolls.com/nasset/docs/com%2010%20I-5%20full%20ramps.pdf

Community Support

Location, Location, Location (2-pgs) #6 attachment

Into the Ports and Out of the Neighborhoods with a new freeway corridor
http://www.nobridgetolls.com/nasset/docs/com%209%20I-305%20Map%20into%20ports%20of%20N%20streets-R.pdf

Traffic Average Daily Total map showing inhuman freight traffic levels
http://www.nobridgetolls.com/nasset/docs/G-5%20%20%20R2011.0328_Third_Bridge_Now_Report_Final-smallerPix(2)%20pg11%20and%2022maps.pdf%20%20f.pdf

Third Bridge Now Multi-modal map link.
https://www.youtube.com/watch?v=nzaMpNR-Wj8&t=1006s

Celebrate North Portland 2011 and 2017 (3-pags)
http://www.nobridgetolls.com/nasset/docs/com%207%20%20Awards%20-%20three.pdf

Picture of one community of three meetings held by community members. #7 attachment

Vacant land Far Less Impacts In Primary Area Of Potential Impacts than I-5 construction #8 attachment

Solution to truck traffic in St. Johns hit roadblocks
http://www.nobridgetolls.com/nasset/docs/com%206%20%20All%20side%20agree%20an%20new%20Bridge-L.pdf

St Johns' Review http://www.nobridgetolls.com/nasset/docs/com%205%20newspaper%20nw%20passage.pdf

New Northwest Passage has traffic relief in mind
http://www.nobridgetolls.com/nasset/docs/com%205%20newspaper%20nw%20passage.pdf

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Link web site for CRC data
http://www.nobridgetolls.com/nasset/


Never doubt that a small group of concerned
citizens can change the world. indeed,
it's the only thing that ever has."

Opportunity Knocks!

Secretary Buttigieg

It's true.

A chance to clear-up transportation projects pass and current with social injustice issues is one of your specialties. Unfortunately we have a major challenge for you. Our community needs you to step-in and be our advocate to make sure we receive our Right to have a fair, open, honest, inclusive, and thorough process of alternatives. Your attention and help to place the community's alternatives back into the process **is necessary**.

The I-5 freeway ripped through our community and left several transportation issues decades old. A new freeway bi-pass of the I-5 freeway connecting our ports and industrial areas together and out of our neighborhoods while providing a third bridge between two very large metropolitans must at the very least be studied.

This is one of the very few times that a community is asking for a freeway to come to their area.

We promise you that once we have an honest process. We will work diligently with all the stakeholders to identify a Locally Preferred Alternative that is construct-able in record time!

This report has verifiable data showing a dishonest, incomplete process where the National Environmental Policy Act requirements were not met.

Thank you, in advance Secretary Buttigieg for your attention in this matter. We greatly appreciate your help getting a fair and honest process!

Dr. Martin Luther King Jr. said.
"Once you know the truth you can never go back to not knowing"

Secretary Buttigieg please use your oversight power concerning the current Bridge Replacement Project Environmental Impact Statement. The Bridge Replacement Project is still in the process of finding and evaluating a Locally Preferred Alternative to provide to the public for comment. This part of the process is known as a Draft Supplemental EIS and is meant to open up the process for alternatives that might not have been studied. This is the time to enter comparable alternatives that are supported by the community.

For the Bridge Replacement Project to go forward, or any bridge project to go forward concerning the I-5 bridges it must have the support of the stakeholders. The sticking point is that NO alternative of the same size or scope as the current Bridge Replacement Project has been studied. The CRC **"STAFF"** Not the Project Signatory Agencies, Not the CRC Project Sponsor Council, Not the CRC Citizen Advisory Taskforce, Not the Public. Staff, CRC STAFF removed the ONLY comparable freeway corridor alternative RC-14. Without any process watch staff remove RC-14 from CRC EIS http://www.youtube.com/watch?v=jdnbvv6Rtgg

Staff went against the direction of CRC Federal Register that ALL alternatives would be thoroughly studied through construction and operations, recommendation from previous studies, including a highway would be studied in the CRC EIS. Alternative RC-14 was brought into the CRC EIS during NEPA Scoping.

CRC Staff denied the community and the nation of a fair and honest process. This has left us stuck for almost 20 years. This is the time to place the award(s) winning alternative back into the Bridge Replacement Project process. The port to port alignment location was recommended for further I-5 Portland/Vancouver Trade and Transportation Partnership and Bridge Influence Area EIS 2002. The CRC Purpose and Needs Statement identifies BNSF rail bridge as the "Center of the project area". This link has 2 testimonies from citizen comment and Metro Councilor Brian Newman's comments on the CRC process
https://www.youtube.com/watch?v=hBfc4rifWcc&t=332s

The Third Bridge Now freeway corridor connects with Hayden Island, HWY-30, Swan Island, and includes upgrades to I-5 and I-84, using mostly public Right Of Way in Oregon. A multi-modal freeway corridor with new heavy rail tracks from Longview WA, vehicles, buses, bikes and pedestrian capacity known as RC-14.

Third Bridge Now
Freeway Speed 55 MPH
Lift No
High capacity on/off ramps 15 access points
Freeway 6-lanes 2000 per-hour lane
Managed 2-lanes 2000 per-hour lane
Heavy rail 2-track unknown
LOS Capacity 190,000-200,000 vehicles daily north
LOS Capacity 190,000-200,000 vehicles daily south
Fully multi-modal vehicle, heavy rail, bike, and pedestrian
Alignment length approximately 9-miles
Third Bridge Now freeway has the communities support
Celebrate North Portland 2011 and 2017 Award
http://www.nobridgetolls.com/nasset/docs/com%207%20%20Awards%20-%20three.pdf
Third Bridge Now moving map link
https://www.youtube.com/watch?v=nzaMpNR-Wj8&t=1006s
www.ThirdBridgeNow.org

Social Injustice and Lack of Process
Report Summary

"The I-5 Bridges are in Pristine Condition"

I was sitting at the Washington Transportation Commission Hearing in 2005 in Olympia when the SW WA Transportation Director Don Wagner made that statement. During his report he stated the bridges had no restrictions, met all requirements, and the steel was as thick as the original specification called with no rust was found. He provided a document with the Oregon State Seal on top reporting that the bridges have more than 60 years of life left. The inspection titled The Interstate Bridges Electrical Upgrade Project had several favorable remarks concerning the quality and value of the Columbia River Crossing. (1)

2002 data stated. We have fewer bridges than similar sized metropolitans if we built two more bridges across the Columbia River we would still be in last place. The bridges are rated at 88,000 vehicle and they carry 135,000 –145,000 daily The bridge is not the problem This picture shows the I-5 freeway has a Level Of Service rating of F since the 1980's with approximately 30,000 vehicles daily cutting through the neighborhoods to avoid congestion. (2)

Six bridges in the Portland area are older than the 1917 I-5 bridge. Twelve are older than the 1958 I-5 twin bridge. To remove available infrastructure because of age goes against current policy of preserve and maintain basic engineering practice the federal and state motto.(3)

The Federal Register /Vol. 70, No. 186 /Tuesday, September 27, 2005 /Notices for the CRC describes the project fully, Study Area, and that All alternatives Must be studied Thoroughly benefits and impacts though construction and operations. (4)

St Johns' Review community newspaper Aug. 26, 2005
North Portland group expresses own ideas and solutions for improving I-5 traffic, by Gayla Patten (5)

Third Bridge Now freeway has the communities support
Celebrate North Portland Awards 2011 and 2017 (5b)

The Columbian newspaper Vancouver WA March 1, 2002
Selling the "Northwest Passage" by Thomas Ryll (6)

The importance of the Multnomah County Democratic Party 2020 Platform keep and maintain infrastructure when possible. The platform also identified having a third bridge constructed and open before any changes are made to the I-5 freeway bridges. (7)

I-5 Partnership summary recommendation page (8)

1. A Supplemental Bridge or Replacement Bridge (dependent on the bridges condition)
2. Add a lift the BNSF bridge for marine safety and 95% less on the I-5 bridges
3. Light rail loop in Clark County and bus routes
4. Additional heavy rail freight and commuter service

Description Third Bridge Now
New freeway corridor is fully multi-modal alignment starting at I-5 and Mill Plain in Vancouver, crossing into Oregon and going south through Swan Island I-5, I-84, I-405, and west to HWY-30.
Freeway
Speed 55 MPH
Lift No
High capacity on/off ramps Yes
Freeway 6-lanes 2000 per hour per lane
Managed 2-lanes 2000 per hour per lane
Heavy rail 2-track unknown
Third Bridge Now moving map link https://www.youtube.com/watch?v=nzaMpNR-Wj8&t=1006s

CRC presentation to Joint Oregon/Washington Transportation Commission "Original Project Scope" adding capacity across the Columbia River https://www.youtube.com/watch?v=CzQwLDHJo_M

Joint Senate CRC oversight committee Senator George and Senator Benton's comments GeorgeBentonAsk.avi.MP4 http://www.youtube.com/watch?v=7fI74enogME

Watch CRC staff remove RC-14 a community supported third bridge alternative without any process. ArchMiller_ReplaceBridge.avi.MP4 (9) http://www.youtube.com/watch?v=jdnbvv6Rtgg
This video is former Vancouver Port Commissioner Arch Miller telling the CRC Task Force advisory citizen committee to remove and not study the Third Bridge Corridor (RC-14) brought in during NEPA Scoping violate the NEPA EIS. The fact that an elected official would brazenly stand up and tell the official CRC Task Force and community that "HE" Thinks and What "HE" wants and what "HE" believes we MUST do as we are told! Totally scrap having a fair and honest process or a comparable alternative. Keeping information from the citizens by the government is a First Amendment violation.

This link has two testimonies from citizen comment and Metro Councilor Brian Newman's comments on the horrible treatment during the CRC process https://www.youtube.com/watch?v=hBfc4rifWcc&t=332s

Formal letters from CRC Signatory Sponsor Agencies and elected officials RC-14 was not studied or vetted in the CRC EIS Process!

1. November 15, 2010 SW Washington Regional Transportation Council (10)

2. October 28, 2010 CTRAN (11)

3. February 11, 2009 WA Senator Benton and with 12 signatures from elected official from Oregon and Washington (12) (13)

4. July 23, 2010 and again August 29, 2012 Clark County Board of Commissioners (14)

5. December 12, 2009 Clark County Commissioner Steve Stuart description email "Third Bridge" not studied a good explanation (15)

www.ThirdBridgeNow.org
Third Bridge Now moving map link https://www.youtube.com/watch?v=nzaMpNR-Wj8&t=1006s

Page three document links for numbers 1-15 on pages one and two.

"The I-5 Bridges are in Pristine Condition"
Links

(1) Columbia River Crossings commonly known as I-5 bridges
http://www.nobridgetolls.com/nasset/docs/H-(1)%20%20Bridge%20cond%20of%20I-5%20freeway%202005.JPG.pdf

(2) http://www.nobridgetolls.com/nasset/docs/G-6%20Freight%20and%20Port%20info%20Question%203.pdf

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(5) http://www.nobridgetolls.com/nasset/docs/com%203%20%20%20St%20Johns'%20good%20review%20copy.pdf

(5b) http://www.nobridgetolls.com/nasset/docs/com%207%20%20Awards%20-%20three.pdf

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(11) http://www.nobridgetolls.com/nasset/docs/PPP-(3)%20%20%20CTRAN%20letter%20about%20TBN.pdf

(12) http://www.nobridgetolls.com/nasset/docs/PPP-(4)%20%20%20US%20Rep.pdf

(13) http://www.nobridgetolls.com/nasset/docs/PPP-(5)%20%20%20Not%20studied%20Sen%20Benton%20%2012%20letter.%20pdf.pdf

(14) http://www.nobridgetolls.com/nasset/docs/PPP-(6)%20%20BCCC%20formal%20letter%202010%20and%202012.pdf

(15) http://www.nobridgetolls.com/nasset/docs/PPP-(8)%20%20%20%20Steve%20Stuart%20letter%20explaing%20not%20studiedpdf.pdf

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www.ThirdBridgeNow.org
Third Bridge Now moving map link https://www.youtube.com/watch?v=nzaMpNR-Wj8&t=1006s

Immediate Action is Requested

Secretary Pete Buttigieg Thank you, Thank you, THANKYOU from the bottom of our hearts! For stating out loud that you acknowledged we have issues and concerns with the two transportation studies on going. This was the first sign of respect for our community we have had in decades from the FHWA. The last person to treat us with respect was Jeff Graham, Operations Engineer, Federal Highway Administration, Oregon Division during the I-5 Portland / Vancouver Transportation and Trade Partnership in 2002. It gave us such great hope!

We know that you will provide a fair, honest, equal, and thorough study process of alternatives equal in scope to the current replacement project. The community that the transportation projects are taking place in have alternatives that they support. These alternative components where brought in during the National Environmental Policy Act Scoping for the Columbia River Crossing Environmental Impact Statement. These award winning alternatives where removed from the CRC EIS NEPA Process violating the NEPA Process and federal funding requirements.

We Are Asking That You Take Immediate Action Thank You Sir.

1. Stop the two processes The Bridge Replacement Project and the Rose Quarter

2. The CRC Independent Review Panel 2010 recommended that those associated with the project contractors, vendors, transportation employees state, and federal need to be replaced.

3. Start a new Environmental Impact Statement as described in the CRC Federal Register /Vol. 70, No. 186 /Tuesday, September 27, 2005 /Notices 56523

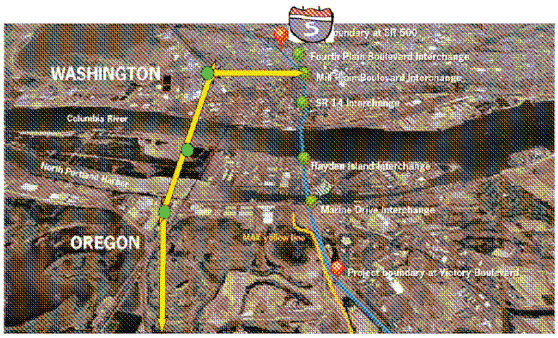
4. Provide an independent third party mediator to monitor and conduct annual surveys of the public through construction and operations.

5. Make a commitment that our community's alternative components are Thoroughly and equally studied benefits and impact through construction and operations as is stated in the CRC Federal Register and required for federal funding.

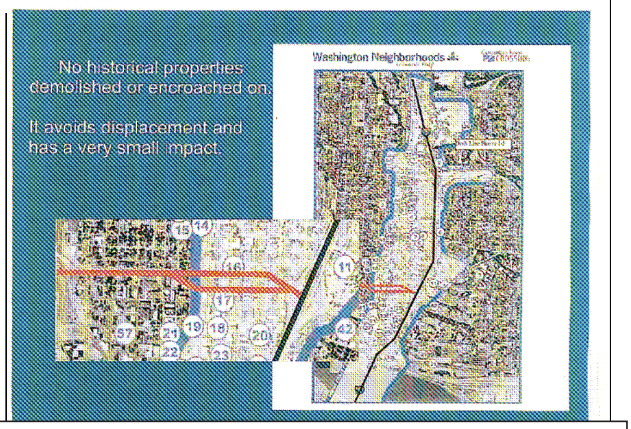
6. The data from the study must be fully publicized in a FREE paper format. In 2006 the CRC charged $50 for the results of the Environmental Impact Statement Draft "booklet" or you could get the information on-line or at the public library in a non-check-out book. I was given my booklet by an elected official who made me promise I would carry it to meetings so people could see it clearly. That if anyone asked me where I got my copy I was to tell them, Clark County Commissioner Marc Bolt gave me his copy and I did ask he asked.

7. US Coast Guard Truman Hobbs Act Hearings
   The BNSF rail bridge is one of the 10 most dangerous hazard in the United States waterways. The transportation departments in1958 created the problem of lift alignments. The correction, removal of the hazard will benefit the I-5 freeway the most and needs to be paid for by the FHWA. Since 1990's the upgrade to the BNSF rail Bridge has been identified as necessary. That it would reduce the lifts on the I-5 freeway bridge by 95%, relieves congestion, air, noise pollution, and car accidents. The project is shovel ready, this type of project is regularly done by BNSF, it is in line with the current infrastructure requirements funding of Build Back Better. Local FHWA are not seeking funding to correct this national water hazard while complaining about the number of lifts on the I-5 freeway being a major problem.

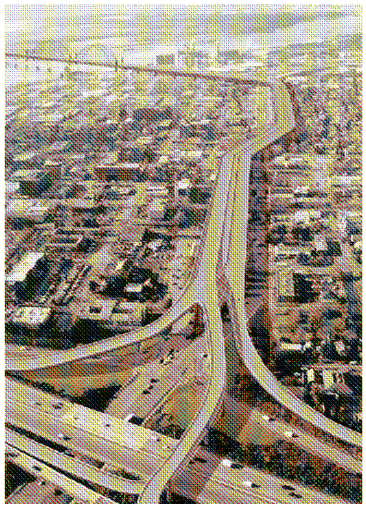
Strategically locating Third Bridge freeway corridor where the traffic is coming from and going to will UNCLOG the entire transportation system.



Third Bridge Now Freeway Corridor Alignment
New Interchanges



A replacement bridge on I-5 affects hundreds of properties residential, businesses, 4 (f) Historic Resource Properties and closing of schools in OR / WA. The new freeway corridor uses one vacate street and limited access



Freeway corridor viaduct from I-5 freeway into the Port of Vancouver over vacated surface level hazardous material and truck route removing traffic from several neighborhood streets



New freeway corridor on vacant publicly owned land, providing a second bridge to Hayden Island and connects the ports and industrial areas. The bridge replacement would take dozens of properties, bridges, infrastructure, exits that with 9 to11 years of construction on the I-5 freeway with I-205 as the only alternative to cross the Columbia River



Only 1 mile between the I-5 bridges and the BNSF bridge adjacent to new freeway corridor with the I-205 bridge being 6-miles east of the I-5 bridges.

Comparison of River Crossings in Selected U.S. Metropolitan Areas of Similar Size

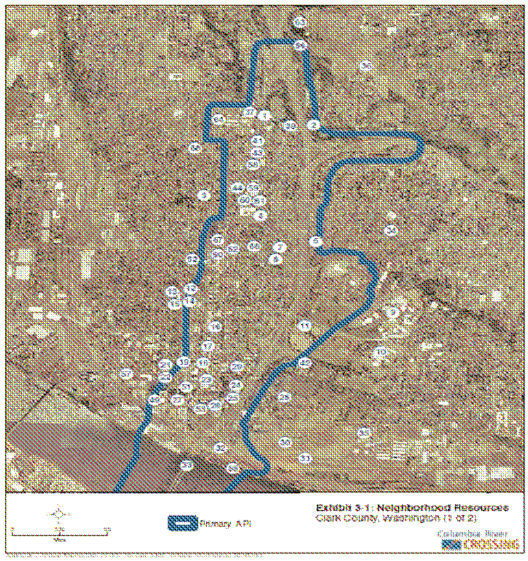
Metro Area	Population	Body of Water	Hwy Xings	Rail Xings
Norfolk	1.57 million	Hampton Roads/ Chesapeake Bay	4	0
Cincinnati	1.65 million	Ohio River	7	2
Kansas City	1.78 million	Missouri River	10	3
Portland-Vancouver	**1.92 million**	**Columbia River**	**2**	**1**
Pittsburgh	2.36 million	Three Rivers	>30	3
St. Louis	2.60 million	Mississippi River	8	2

1999 I-5 Corridor Study data. Our REALITY congestion hurts business and family events with continuous uncertain

We are asking for A STUDY not Construction just a fair, equal, and honest study.

Most People when they see this much devastation to communities and property will study anything else before affecting hundreds of properties including residential neighborhoods, businesses, protect Historic Resource Properties, and schools in both states. The sound of bull-dozers smashing buildings, valuable infrastructure I-5 freeway lanes, and recently redesigned exits and access to the I-5 freeway are removed. All of the actual construction on the I-5 freeway, removal of the bridges off of the interstate, bring in building supplies is all the more congestion to the current congestion problem. The extra pollution, land-fill, and money from construction in a highly urbanized area. The alternative freeway corridor effect less the 20 private properties total, not needing to waste time and money on demolishing vital infrastructure.

The area of direct impact and destruction Vancouver WA



The area of direct impact and destruction Hayden Island OR



Not so when it comes to the local FHWA FTA they have lied, cheated, hidden data, and falsified government documents to avoid any alternative studies. Trying at every turn to make us knuckle under and **accept our fate we are nothing but bull-dozer bate to them!**

Even if following the law and being a decent human being wasn't what you supported. The devastation of 9-11 years of added congestion from construction on the I-5 freeway system to the local and national economy is unacceptable. The current congestion effects the economy of 17 states, and cost Oregon billions of dollars annually right now. The 1999 I-5 Corridor Study stated the congestion problems needed immediate action on all types of infrastructure roads, bridges, transit, and heavy rail capacity. The good news is having a thorough honest studying the alternatives will either provide the replacement bridge as the best or save us from a horrific mistake that will be attached to all involved.

The FHWA has kept us stuck on a former David O. Cox Division Administrator FHWA – Oregon Division agenda of a "new" I-5 bridge as a feather in his cap for his retirement! Cox' has been gone for over a decade. He and the rest of the Oregon and Washington Division FHWA employees have knowingly accepted falsified official documents, data, and information and have not provided fair and honest dealings. The contractor and the departments of transportation singularly focused on giving the FHWA employee what he had decided for our states. Cox's without a study stated, that what he felt was the best way and only way forward for our region that he would allow.

The Columbia River Crossing Project Sponsor Council was the formal Decisions Maker designated as such by the CRC Signatory Agencies. When the CRC Project Sponsor Council refused to Adopt the CRC staff's proposed Purpose and Needs Statement. The reasons being staff had removed everything concerning community, history, noisy, air quality, etc from the sterile Purpose and Needs Statement being presented. Then the local FHWA removed from the Project Sponsor Council, and "fixed" the Purpose and Needs Statement and the Evaluation Framework all on their own with no citizen involvement. The projects documents have never been formerly Adopted by the Signatory Agencies or their representatives violating federal and state Open Meetings Laws, Sunshine Laws, and the NEPA Process. Thus making the project documents null-and-void. The current Purpose and Needs Statement is almost two decades old and was created by the FHWA. We are being forced to used for the current "Replacement" Bridge Project without any changes allowed the exact same Purpose and Needs Statement. The CRC, the Bridge Replacement Project, and the Rose Quarter Project do not have formally Adopted Purpose and Needs Statement(s) and other documents. The permission of the govern is not part of the FHWA process in our area. For years from the start of this project elected officials at all levels federal, state, and local in formal letters, including Signatory Agencies, and oversight committees have been unable to affect or stop the FHWA push for their agenda of a new bridge.

The Oregon Legislators required CRC Independent Review Panel in 2010. The IRP basically said two things all those responsible for the CRC needed to be replaced for any project to reestablish creditability. And that you can't have outreach if you don't have in-reach. The public, governing bodies, and elected officials had no way to affect the process.

You will find a summary report of some of the problems and concerns with the current transportation projects that I prepared. Thank you again!

Peace,
Sharon

Sharon Nasset
[redacted]



Location, Location, Location

Transportation is a deep important dive for our end of town. Our location because of the physical attributes and investments made makes us the economic engine of the State. With this opportunity we need to provide the infrastructure that protect the communities that surround our industrial sanctuaries, while supporting the businesses needs. The Mississippi and Columbia Rivers are the only rivers that goes from the ocean into the interior of the U.S. we have deepwater ports and services on the peninsula. The only transcontinental rail in the U.S. BNSF, continental rail to the east coast, Marine Dr Corridor, Columbia Corridor, Lombard HWY-30 By-pass, east-west roads, I-5 freeway, Greeley, Interstate Ave, Albina Ave, Vancouver Ave, MLK Blvd north-south roads. Rivergate, Port of Portland, Northgate, Marine Dr.-Hayden Meadows, and Swan Island employment centers are all in North Portland. This tells us to make sure we pay attention to adding enough infrastructures that is fully multi-modal with more benefits than negative impacts.

We have one bridge the St. Johns' Bridge that goes through the center of town. Only the Marine Dr Corridor is not using our residential streets to reach the land-locked industrial areas. During the 2001 St. Johns' Truck Strategy Hearing at Portland City Council Mayor Katz and the Council Members stated. That the truck problems in St. Johns' and North Portland were inhuman and the only place in State where trucks traffic was allowed to trump community livability. http://www.nobridgetolls.com/nasset/docs/G-5%20%20%20R2011.0328_Third_Bridge_Now_Report_Final-smallerPix(2)%20pg11%20and%2022maps.pdf%20%20f.pdf

Transportation meetings concerning adding capacity across the Columbia River are starting up again in the spring of 2024. When citizens have become fully involved in the process they have made the outcome much better. In 2001 the Portland City Council did not formally Adopt the St. Johns' Truck Strategy. Part of that plan not adopted was to raise the speed limit for trucks, turning Ivanhoe St. into a "truck corridor" with sound walls from the bridge to St. Louis and then west on Lombard St. That did not happen because people wrote letters, made calls, and showed up. With facts and data from original transportation studies, meetings, and letters from elected officials that can be used to clear up misinformation issues. We have to put the puzzle pieces together from former transportation studies it is part of the vigilance of being between two mighty rivers the Willamette and the Columbia.

Here is what has taken place:

> In the 1980's Oregon and Washington Legislators met and accepted the Federal Highway "F" rating Level Of Service (LOS) for the I-5 freeway in north Portland from I-84 to the I-5 bridges.
>
> In 2002 the I-5 Portland /Vancouver Transportation and Trade Partnership EIS recommended capacity across the Columbia River with a Supplemental **or** a Replacement bridge.
>
> In 2005 an independent I-5 bridge(s) inspection had a favorable report including the bridges having more than 60 years of life left.
>
> In 2002 the bridge alternative #8 adjacent to the BNSF rail line was recommended out of the I-5 Partnership EIS for further study not just a replacement bridge.
>
> The Columbia River Crossing EIS during NEPA Scoping identified *RC-14 Bi-State Industrial Corridor freeway adjacent to the BNSF rail line as an alternative. * Third Bridge Now

CRC staff stated in official documents and the video shows CRC staff removing RC-14 without process. CRC staff, not the Project Sponsor Council, CRC Signatory Agencies, legislative oversight committees, or the citizen's advisory CRC Task Force

Letters from the CRC Signatory Agencies and elected official that the NEPA Process was not followed, RC-14 was not studied or vetted.

It is a lie when ODOT – WADOT – and the Bridge Replacement Project say that Third Bridge Now freeway corridor was studied or vetted. It is also a lie to say EIS for the I-5 Partnership stated a Replacement Bridge only. The required NEPA Citizen Comment Period on the "Replacement Bridge Project" will be started soon. They need to hear from you that you want a thorough and honest study, that removing RC-14 was wrong, unfair, and won't be tolerated.

Transportation staff can't say theirs, "staff's idea is best" without comparing it to an alternative at lease as large and with comparable amenities as the only project they are studying. Comparing alternatives side by side to show how or why it works or not should not be "feared" by staff. It needs to be an enjoyable challenge that different alternatives being studied offer.

Metro a CRC Signatory Agency, President and Project Sponsor Council member David Bragdon letter date May 5, 2021 (B)
http://www.nobridgetolls.com/nasset/docs/B%20%20%20%20%209%20%20David%20Bragdon%20May%205.pdf
Metro a CRC Signatory Agency, President and Project Sponsor Council member David Bragdon letter date May 19, 2010 (A)
http://www.nobridgetolls.com/nasset/docs/A%2010%20DavidBragdonCRCReviewMay19.pdf

This link has 2 testimonies from citizen comment and Metro Councilor Brian Newman's comments on the CRC process https://www.youtube.com/watch?v=hBfc4rifWcc&t=332s

Third Bridge Now moving map link
https://www.youtube.com/watch?v=nzaMpNR-Wj8&t=1006s

RC-14 is www.ThirdBridgeNow.org

Index Attachments and Electronic Links

Mural Linnton Community Center Cover #1 attachment

Intro letter Opportunity Knocks #2 attachment

Martin Luther King JR's Quote #3 attachment

Summary

Columbia River Crossing(s) the I-5 Bridge condition from 2005 with Oregon State Seal
http://www.nobridgetolls.com/nasset/docs/H-(1)%20%20Bridge%20cond%20of%20I-5%20freeway%202005.JPG.pdf

Social Injustice and Lack of Process Report Summary (3-pgs) #4 attachment

Request For Action

Immediate Action is Requested (3-pgs) #5 attachment

Picture showing I-5 Freeway 1-mile south of the I-5 bridges is over-capacity
http://www.nobridgetolls.com/nasset/docs/com%2010%20I-5%20full%20ramps.pdf

Community Support

Location, Location, Location (2-pgs) #6 attachment

Into the Ports and Out of the Neighborhoods with a new freeway corridor
http://www.nobridgetolls.com/nasset/docs/com%209%20I-305%20Map%20into%20ports%20of%20N%20streets-R.pdf

Traffic Average Daily Total map showing inhuman freight traffic levels
http://www.nobridgetolls.com/nasset/docs/G-5%20%20%20R2011.0328_Third_Bridge_Now_Report_Final-smallerPix(2)%20pg11%20and%2022maps.pdf%20%20f.pdf

Third Bridge Now Multi-modal map link.
https://www.youtube.com/watch?v=nzaMpNR-Wj8&t=1006s

Celebrate North Portland 2011 and 2017 (3-pags)
http://www.nobridgetolls.com/nasset/docs/com%207%20%20Awards%20-%20three.pdf

Picture of one community of three meetings held by community members. #7 attachment

Vacant land Far Less Impacts In Primary Area Of Potential Impacts than I-5 construction #8 attachment

Solution to truck traffic in St. Johns hit roadblocks
http://www.nobridgetolls.com/nasset/docs/com%206%20%20All%20side%20agree%20an%20new%20Bridge-L.pdf

St Johns' Review http://www.nobridgetolls.com/nasset/docs/com%205%20newspaper%20nw%20passage.pdf

New Northwest Passage has traffic relief in mind
http://www.nobridgetolls.com/nasset/docs/com%205%20newspaper%20nw%20passage.pdf

Multnomah County Democrat Platform 2020 Infrastructure calling for additional bridges first (6pgs)
http://www.nobridgetolls.com/nasset/docs/com%201%202020%20%20Mutl%20County%20Dem%20PlateformArticle%20XIII.pdf

Third Bridge Now brochure (Pgs.2)
http://www.nobridgetolls.com/nasset/docs/com%2013%20I-305_flyer_4._20143_-c-1-4%20%20%20fornt.pdf
http://www.nobridgetolls.com/nasset/docs/com%2014%20I-305_flyer_4.2014... back-JK-1.%20%20%20backpdf.pdf

Report

Social Injustice and Lack of Process Report for Secretary Buttigieg (pgs-29) #9 attachment

Train Tour

Invitation to take a tour anytime you wants
Links showing previous tours using the train, buses, and light rail to see the entire project #10 attachment

Selling the "Northwest Passage" (pgs-2)
http://www.nobridgetolls.com/nasset/docs/com%204%20SellingTheNWPassage.pdf

Tour Route map
Third Bridge Corridor Conceptual Layout map showing residential and industrial sanctuaries
Tour Program
Tour Schedule #11 attachment

Third Bridge Corridor Preliminary Benefit Analysis 2011 (pgs-26)
http://www.nobridgetolls.com/nasset/docs/EEEE-(2)%20Third_Bridge_Now_Report_Final-smallerPix(2)(1).pdf

Celebrate North Portland Award 2017 –for Transportation Alternative Thank You All! (with me)
http://www.nobridgetolls.com/nasset/docs/com%202%20Celebrate%20North%20Portland%202017%20Award.pdf

BNSF Rail Bridge U.S. Coast Guard

Request For Action from:

U.S. Coast Guard and FHWA to move forward on the addition of a second lift on the BNSF rail bridge benefiting the environment and highway and marine safety. (pgs-5) Report #12 attachment

CFR :: 33 CFR Part 116 -- Alteration of Unreasonably Obstructive Bridges (pgs-7) #13 attachment

Federal Register CRC
http://www.nobridgetolls.com/nasset/docs/I%20%20%20%20%20Fed%20Reg%20CRC%20good.pdf
http://www.nobridgetolls.com/nasset/docs/I%20-(2)%20%20%20fed%20reg%20with%20boxes%20and%20arrows-2.pdf

I-5 Portland /Vancouver Transportation and Trade FEIS recommendations
http://www.nobridgetolls.com/nasset/docs/ZZ%20%20final_recc_at_glance.pdf

Link web site for CRC data
http://www.nobridgetolls.com/nasset/


Never doubt that a small group of concerned
citizens can change the world. indeed,
it's the only thing that ever has."

Opportunity Knocks!

Secretary Buttigieg

It's true.

A chance to clear-up transportation projects pass and current with social injustice issues is one of your specialties. Unfortunately we have a major challenge for you. Our community needs you to step-in and be our advocate to make sure we receive our Right to have a fair, open, honest, inclusive, and thorough process of alternatives. Your attention and help to place the community's alternatives back into the process **is necessary**.

The I-5 freeway ripped through our community and left several transportation issues decades old. A new freeway bi-pass of the I-5 freeway connecting our ports and industrial areas together and out of our neighborhoods while providing a third bridge between two very large metropolitans must at the very least be studied.

This is one of the very few times that a community is asking for a freeway to come to their area.

We promise you that once we have an honest process. We will work diligently with all the stakeholders to identify a Locally Preferred Alternative that is construct-able in record time!

This report has verifiable data showing a dishonest, incomplete process where the National Environmental Policy Act requirements were not met.

Thank you, in advance Secretary Buttigieg for your attention in this matter. We greatly appreciate your help getting a fair and honest process!

Dr. Martin Luther King Jr. said.
"Once you know the truth you can never go back to not knowing"

Secretary Buttigieg please use your oversight power concerning the current Bridge Replacement Project Environmental Impact Statement. The Bridge Replacement Project is still in the process of finding and evaluating a Locally Preferred Alternative to provide to the public for comment. This part of the process is known as a Draft Supplemental EIS and is meant to open up the process for alternatives that might not have been studied. This is the time to enter comparable alternatives that are supported by the community.

For the Bridge Replacement Project to go forward, or any bridge project to go forward concerning the I-5 bridges it must have the support of the stakeholders. The sticking point is that NO alternative of the same size or scope as the current Bridge Replacement Project has been studied. The CRC **"STAFF"** Not the Project Signatory Agencies, Not the CRC Project Sponsor Council, Not the CRC Citizen Advisory Taskforce, Not the Public. Staff, CRC STAFF removed the ONLY comparable freeway corridor alternative RC-14. Without any process watch staff remove RC-14 from CRC EIS http://www.youtube.com/watch?v=jdnbvv6Rtgg

Staff went against the direction of CRC Federal Register that ALL alternatives would be thoroughly studied through construction and operations, recommendation from previous studies, including a highway would be studied in the CRC EIS. Alternative RC-14 was brought into the CRC EIS during NEPA Scoping.

CRC Staff denied the community and the nation of a fair and honest process. This has left us stuck for almost 20 years. This is the time to place the award(s) winning alternative back into the Bridge Replacement Project process. The port to port alignment location was recommended for further I-5 Portland/Vancouver Trade and Transportation Partnership and Bridge Influence Area EIS 2002. The CRC Purpose and Needs Statement identifies BNSF rail bridge as the "Center of the project area". This link has 2 testimonies from citizen comment and Metro Councilor Brian Newman's comments on the CRC process
https://www.youtube.com/watch?v=hBfc4rifWcc&t=332s

The Third Bridge Now freeway corridor connects with Hayden Island, HWY-30, Swan Island, and includes upgrades to I-5 and I-84, using mostly public Right Of Way in Oregon. A multi-modal freeway corridor with new heavy rail tracks from Longview WA, vehicles, buses, bikes and pedestrian capacity known as RC-14.

Third Bridge Now
Freeway Speed 55 MPH
Lift No
High capacity on/off ramps 15 access points
Freeway 6-lanes 2000 per-hour lane
Managed 2-lanes 2000 per-hour lane
Heavy rail 2-track unknown
LOS Capacity 190,000-200,000 vehicles daily north
LOS Capacity 190,000-200,000 vehicles daily south
Fully multi-modal vehicle, heavy rail, bike, and pedestrian
Alignment length approximately 9-miles
Third Bridge Now freeway has the communities support
Celebrate North Portland 2011 and 2017 Award
http://www.nobridgetolls.com/nasset/docs/com%207%20%20Awards%20-%20three.pdf
Third Bridge Now moving map link
https://www.youtube.com/watch?v=nzaMpNR-Wj8&t=1006s
www.ThirdBridgeNow.org

Social Injustice and Lack of Process
Report Summary

"The I-5 Bridges are in Pristine Condition"

I was sitting at the Washington Transportation Commission Hearing in 2005 in Olympia when the SW WA Transportation Director Don Wagner made that statement. During his report he stated the bridges had no restrictions, met all requirements, and the steel was as thick as the original specification called with no rust was found. He provided a document with the Oregon State Seal on top reporting that the bridges have more than 60 years of life left. The inspection titled The Interstate Bridges Electrical Upgrade Project had several favorable remarks concerning the quality and value of the Columbia River Crossing. (1)

2002 data stated. We have fewer bridges than similar sized metropolitans if we built two more bridges across the Columbia River we would still be in last place. The bridges are rated at 88,000 vehicle and they carry 135,000 –145,000 daily The bridge is not the problem This picture shows the I-5 freeway has a Level Of Service rating of F since the 1980's with approximately 30,000 vehicles daily cutting through the neighborhoods to avoid congestion. (2)

Six bridges in the Portland area are older than the 1917 I-5 bridge. Twelve are older than the 1958 I-5 twin bridge. To remove available infrastructure because of age goes against current policy of preserve and maintain basic engineering practice the federal and state motto.(3)

The Federal Register /Vol. 70, No. 186 /Tuesday, September 27, 2005 /Notices for the CRC describes the project fully, Study Area, and that All alternatives Must be studied Thoroughly benefits and impacts though construction and operations. (4)

St Johns' Review community newspaper Aug. 26, 2005
North Portland group expresses own ideas and solutions for improving I-5 traffic, by Gayla Patten (5)

Third Bridge Now freeway has the communities support
Celebrate North Portland Awards 2011 and 2017 (5b)

The Columbian newspaper Vancouver WA March 1, 2002
Selling the "Northwest Passage" by Thomas Ryll (6)

The importance of the Multnomah County Democratic Party 2020 Platform keep and maintain infrastructure when possible. The platform also identified having a third bridge constructed and open before any changes are made to the I-5 freeway bridges. (7)

I-5 Partnership summary recommendation page (8)

1. A Supplemental Bridge or Replacement Bridge (dependent on the bridges condition)
2. Add a lift the BNSF bridge for marine safety and 95% less on the I-5 bridges
3. Light rail loop in Clark County and bus routes
4. Additional heavy rail freight and commuter service

Description Third Bridge Now
New freeway corridor is fully multi-modal alignment starting at I-5 and Mill Plain in Vancouver, crossing into Oregon and going south through Swan Island I-5, I-84, I-405, and west to HWY-30.
Freeway
Speed 55 MPH
Lift No
High capacity on/off ramps Yes
Freeway 6-lanes 2000 per hour per lane
Managed 2-lanes 2000 per hour per lane
Heavy rail 2-track unknown
Third Bridge Now moving map link https://www.youtube.com/watch?v=nzaMpNR-Wj8&t=1006s

CRC presentation to Joint Oregon/Washington Transportation Commission "Original Project Scope" adding capacity across the Columbia River https://www.youtube.com/watch?v=CzQwLDHJo_M

Joint Senate CRC oversight committee Senator George and Senator Benton's comments GeorgeBentonAsk.avi.MP4 http://www.youtube.com/watch?v=7fI74enogME

Watch CRC staff remove RC-14 a community supported third bridge alternative without any process. ArchMiller_ReplaceBridge.avi.MP4 (9) http://www.youtube.com/watch?v=jdnbvv6Rtgg
This video is former Vancouver Port Commissioner Arch Miller telling the CRC Task Force advisory citizen committee to remove and not study the Third Bridge Corridor (RC-14) brought in during NEPA Scoping violate the NEPA EIS. The fact that an elected official would brazenly stand up and tell the official CRC Task Force and community that "HE" Thinks and What "HE" wants and what "HE" believes we MUST do as we are told! Totally scrap having a fair and honest process or a comparable alternative. Keeping information from the citizens by the government is a First Amendment violation.

This link has two testimonies from citizen comment and Metro Councilor Brian Newman's comments on the horrible treatment during the CRC process https://www.youtube.com/watch?v=hBfc4rifWcc&t=332s

Formal letters from CRC Signatory Sponsor Agencies and elected officials RC-14 was not studied or vetted in the CRC EIS Process!

1. November 15, 2010 SW Washington Regional Transportation Council (10)

2. October 28, 2010 CTRAN (11)

3. February 11, 2009 WA Senator Benton and with 12 signatures from elected official from Oregon and Washington (12) (13)

4. July 23, 2010 and again August 29, 2012 Clark County Board of Commissioners (14)

5. December 12, 2009 Clark County Commissioner Steve Stuart description email "Third Bridge" not studied a good explanation (15)

www.ThirdBridgeNow.org
Third Bridge Now moving map link https://www.youtube.com/watch?v=nzaMpNR-Wj8&t=1006s

Page three document links for numbers 1-15 on pages one and two.

"The I-5 Bridges are in Pristine Condition"
Links

(1) Columbia River Crossings commonly known as I-5 bridges
http://www.nobridgetolls.com/nasset/docs/H-(1)%20%20Bridge%20cond%20of%20I-5%20freeway%202005.JPG.pdf

(2) http://www.nobridgetolls.com/nasset/docs/G-6%20Freight%20and%20Port%20info%20Question%203.pdf

3) http://www.nobridgetolls.com/nasset/docs/H-(2)%20%20%20%20bridge%20ok%20list%20age%20of%20local%20bridges.pdf

(4) http://www.nobridgetolls.com/nasset/docs/I%20%20%20%20%20Fed%20Reg%20CRC%20good.pdf

(5) http://www.nobridgetolls.com/nasset/docs/com%203%20%20%20St%20Johns'%20good%20review%20copy.pdf

(5b) http://www.nobridgetolls.com/nasset/docs/com%207%20%20Awards%20-%20three.pdf

(6) http://www.nobridgetolls.com/nasset/docs/com%204%20SellingTheNWPassage.pdf

(7) http://www.nobridgetolls.com/nasset/docs/com%201%202020%20%20Mutl%20County%20Dem%20PlateformArticle%20XIII.pdf

(8) http://www.nobridgetolls.com/nasset/docs/EEE%20%20%20final_recc_at_glance.pdf

(9) http://www.youtube.com/watch?v=jdnbvv6Rtgg

(10) http://www.nobridgetolls.com/nasset/docs/PPP-(2)%20%20%20RTC%20letter%20TBN%20not%20studied.pdf

(11) http://www.nobridgetolls.com/nasset/docs/PPP-(3)%20%20%20CTRAN%20letter%20about%20TBN.pdf

(12) http://www.nobridgetolls.com/nasset/docs/PPP-(4)%20%20%20US%20Rep.pdf

(13) http://www.nobridgetolls.com/nasset/docs/PPP-(5)%20%20%20Not%20studied%20Sen%20Benton%20%2012%20letter.%20pdf.pdf

(14) http://www.nobridgetolls.com/nasset/docs/PPP-(6)%20%20BCCC%20formal%20letter%202010%20and%202012.pdf

(15) http://www.nobridgetolls.com/nasset/docs/PPP-(8)%20%20%20%20Steve%20Stuart%20letter%20explaing%20not%20studiedpdf.pdf

This link has 2 testimonies from citizen comment and Metro Councilor Brian Newman's comments on the CRC process https://www.youtube.com/watch?v=hBfc4rifWcc&t=332s
www.ThirdBridgeNow.org
Third Bridge Now moving map link https://www.youtube.com/watch?v=nzaMpNR-Wj8&t=1006s

Immediate Action is Requested

Secretary Pete Buttigieg Thank you, Thank you, THANKYOU from the bottom of our hearts! For stating out loud that you acknowledged we have issues and concerns with the two transportation studies on going. This was the first sign of respect for our community we have had in decades from the FHWA. The last person to treat us with respect was Jeff Graham, Operations Engineer, Federal Highway Administration, Oregon Division during the I-5 Portland / Vancouver Transportation and Trade Partnership in 2002. It gave us such great hope!

We know that you will provide a fair, honest, equal, and thorough study process of alternatives equal in scope to the current replacement project. The community that the transportation projects are taking place in have alternatives that they support. These alternative components where brought in during the National Environmental Policy Act Scoping for the Columbia River Crossing Environmental Impact Statement. These award winning alternatives where removed from the CRC EIS NEPA Process violating the NEPA Process and federal funding requirements.

We Are Asking That You Take Immediate Action Thank You Sir.

1. Stop the two processes The Bridge Replacement Project and the Rose Quarter

2. The CRC Independent Review Panel 2010 recommended that those associated with the project contractors, vendors, transportation employees state, and federal need to be replaced.

3. Start a new Environmental Impact Statement as described in the CRC Federal Register /Vol. 70, No. 186 /Tuesday, September 27, 2005 /Notices 56523

4. Provide an independent third party mediator to monitor and conduct annual surveys of the public through construction and operations.

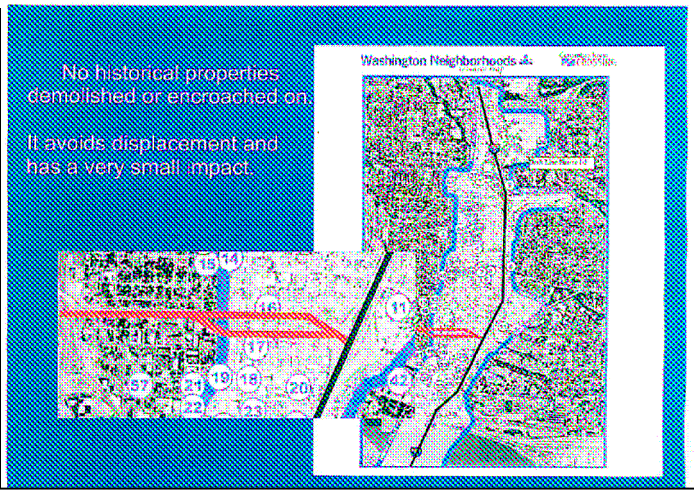
5. Make a commitment that our community's alternative components are Thoroughly and equally studied benefits and impact through construction and operations as is stated in the CRC Federal Register and required for federal funding.

6. The data from the study must be fully publicized in a FREE paper format. In 2006 the CRC charged $50 for the results of the Environmental Impact Statement Draft "booklet" or you could get the information on-line or at the public library in a non-check-out book. I was given my booklet by an elected official who made me promise I would carry it to meetings so people could see it clearly. That if anyone asked me where I got my copy I was to tell them, Clark County Commissioner Marc Bolt gave me his copy and I did ask he asked.

7. US Coast Guard Truman Hobbs Act Hearings
   The BNSF rail bridge is one of the 10 most dangerous hazard in the United States waterways. The transportation departments in1958 created the problem of lift alignments. The correction, removal of the hazard will benefit the I-5 freeway the most and needs to be paid for by the FHWA. Since 1990's the upgrade to the BNSF rail Bridge has been identified as necessary. That it would reduce the lifts on the I-5 freeway bridge by 95%, relieves congestion, air, noise pollution, and car accidents. The project is shovel ready, this type of project is regularly done by BNSF, it is in line with the current infrastructure requirements funding of Build Back Better. Local FHWA are not seeking funding to correct this national water hazard while complaining about the number of lifts on the I-5 freeway being a major problem.

Strategically locating Third Bridge freeway corridor where the traffic is coming from and going to will UNCLOG the entire transportation system.

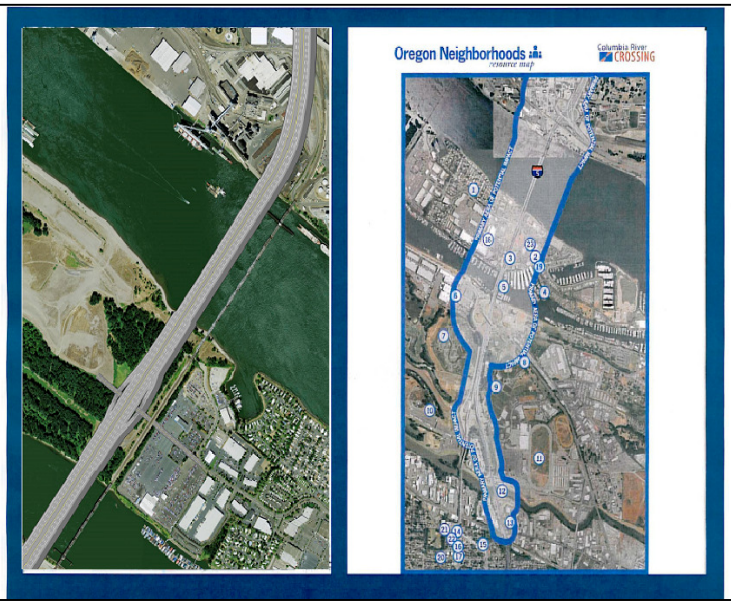




A replacement bridge on I-5 affects hundreds of properties residential, businesses, 4 (f) Historic Resource Properties and closing of schools in OR / WA. The new freeway corridor uses one vacate street and limited access



Freeway corridor viaduct from I-5 freeway into the Port of Vancouver over vacated surface level hazardous material and truck route removing traffic from several neighborhood streets



New freeway corridor on vacant publicly owned land, providing a second bridge to Hayden Island and connects the ports and industrial areas. The bridge replacement would take dozens of properties, bridges, infrastructure, exits that with 9 to11 years of construction on the I-5 freeway with I-205 as the only alternative to cross the Columbia River



Only 1 mile between the I-5 bridges and the BNSF bridge adjacent to new freeway corridor with the I-205 bridge being 6-miles east of the I-5 bridges.

Comparison of River Crossings in Selected U.S. Metropolitan Areas of Similar Size

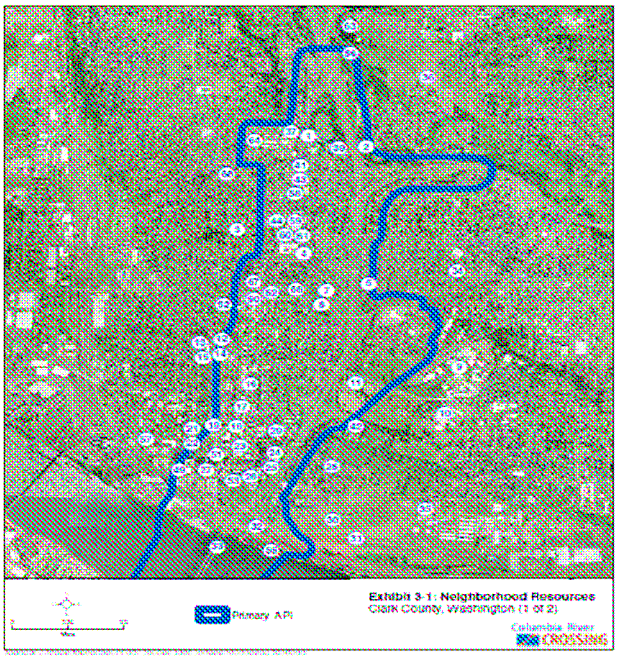
Metro Area	Population	Body of Water	Hwy Xings	Rail Xings
Norfolk	1.57 million	Hampton Roads/ Chesapeake Bay	4	0
Cincinnati	1.65 million	Ohio River	7	2
Kansas City	1.78 million	Missouri River	10	3
Portland-Vancouver	**1.92 million**	**Columbia River**	**2**	**1**
Pittsburgh	2.36 million	Three Rivers	>30	3
St. Louis	2.60 million	Mississippi River	8	2

1999 I-5 Corridor Study data. Our REALITY congestion hurts business and family events with continuous uncertain

We are asking for A STUDY not Construction just a fair, equal, and honest study.

Most People when they see this much devastation to communities and property will study anything else before affecting hundreds of properties including residential neighborhoods, businesses, protect Historic Resource Properties, and schools in both states. The sound of bull-dozers smashing buildings, valuable infrastructure I-5 freeway lanes, and recently redesigned exits and access to the I-5 freeway are removed. All of the actual construction on the I-5 freeway, removal of the bridges off of the interstate, bring in building supplies is all the more congestion to the current congestion problem. The extra pollution, land-fill, and money from construction in a highly urbanized area. The alternative freeway corridor effect less the 20 private properties total, not needing to waste time and money on demolishing vital infrastructure.

The area of direct impact and destruction Vancouver WA



The area of direct impact and destruction Hayden Island OR



Not so when it comes to the local FHWA FTA they have lied, cheated, hidden data, and falsified government documents to avoid any alternative studies. Trying at every turn to make us knuckle under and **accept our fate we are nothing but bull-dozer bate to them!**

Even if following the law and being a decent human being wasn't what you supported. The devastation of 9-11 years of added congestion from construction on the I-5 freeway system to the local and national economy is unacceptable. The current congestion effects the economy of 17 states, and cost Oregon billions of dollars annually right now. The 1999 I-5 Corridor Study stated the congestion problems needed immediate action on all types of infrastructure roads, bridges, transit, and heavy rail capacity. The good news is having a thorough honest studying the alternatives will either provide the replacement bridge as the best or save us from a horrific mistake that will be attached to all involved.

The FHWA has kept us stuck on a former David O. Cox Division Administrator FHWA – Oregon Division agenda of a "new" I-5 bridge as a feather in his cap for his retirement! Cox' has been gone for over a decade. He and the rest of the Oregon and Washington Division FHWA employees have knowingly accepted falsified official documents, data, and information and have not provided fair and honest dealings. The contractor and the departments of transportation singularly focused on giving the FHWA employee what he had decided for our states. Cox's without a study stated, that what he felt was the best way and only way forward for our region that he would allow.

The Columbia River Crossing Project Sponsor Council was the formal Decisions Maker designated as such by the CRC Signatory Agencies. When the CRC Project Sponsor Council refused to Adopt the CRC staff's proposed Purpose and Needs Statement. The reasons being staff had removed everything concerning community, history, noisy, air quality, etc from the sterile Purpose and Needs Statement being presented. Then the local FHWA removed from the Project Sponsor Council, and "fixed" the Purpose and Needs Statement and the Evaluation Framework all on their own with no citizen involvement. The projects documents have never been formerly Adopted by the Signatory Agencies or their representatives violating federal and state Open Meetings Laws, Sunshine Laws, and the NEPA Process. Thus making the project documents null-and-void. The current Purpose and Needs Statement is almost two decades old and was created by the FHWA. We are being forced to used for the current "Replacement" Bridge Project without any changes allowed the exact same Purpose and Needs Statement. The CRC, the Bridge Replacement Project, and the Rose Quarter Project do not have formally Adopted Purpose and Needs Statement(s) and other documents. The permission of the govern is not part of the FHWA process in our area. For years from the start of this project elected officials at all levels federal, state, and local in formal letters, including Signatory Agencies, and oversight committees have been unable to affect or stop the FHWA push for their agenda of a new bridge.

The Oregon Legislators required CRC Independent Review Panel in 2010. The IRP basically said two things all those responsible for the CRC needed to be replaced for any project to reestablish creditability. And that you can't have outreach if you don't have in-reach. The public, governing bodies, and elected officials had no way to affect the process.

You will find a summary report of some of the problems and concerns with the current transportation projects that I prepared. Thank you again!

Peace,
Sharon

Sharon Nasset
503.283.9585
sharonnasset@aol.com



Location, Location, Location

Transportation is a deep important dive for our end of town. Our location because of the physical attributes and investments made makes us the economic engine of the State. With this opportunity we need to provide the infrastructure that protect the communities that surround our industrial sanctuaries, while supporting the businesses needs. The Mississippi and Columbia Rivers are the only rivers that goes from the ocean into the interior of the U.S. we have deepwater ports and services on the peninsula. The only transcontinental rail in the U.S. BNSF, continental rail to the east coast, Marine Dr Corridor, Columbia Corridor, Lombard HWY-30 By-pass, east-west roads, I-5 freeway, Greeley, Interstate Ave, Albina Ave, Vancouver Ave, MLK Blvd north-south roads. Rivergate, Port of Portland, Northgate, Marine Dr.-Hayden Meadows, and Swan Island employment centers are all in North Portland. This tells us to make sure we pay attention to adding enough infrastructures that is fully multi-modal with more benefits than negative impacts.

We have one bridge the St. Johns' Bridge that goes through the center of town. Only the Marine Dr Corridor is not using our residential streets to reach the land-locked industrial areas. During the 2001 St. Johns' Truck Strategy Hearing at Portland City Council Mayor Katz and the Council Members stated. That the truck problems in St. Johns' and North Portland were inhuman and the only place in State where trucks traffic was allowed to trump community livability. http://www.nobridgetolls.com/nasset/docs/G-5%20%20%20R2011.0328_Third_Bridge_Now_Report_Final-smallerPix(2)%20pg11%20and%2022maps.pdf%20%20f.pdf

Transportation meetings concerning adding capacity across the Columbia River are starting up again in the spring of 2024. When citizens have become fully involved in the process they have made the outcome much better. In 2001 the Portland City Council did not formally Adopt the St. Johns' Truck Strategy. Part of that plan not adopted was to raise the speed limit for trucks, turning Ivanhoe St. into a "truck corridor" with sound walls from the bridge to St. Louis and then west on Lombard St. That did not happen because people wrote letters, made calls, and showed up. With facts and data from original transportation studies, meetings, and letters from elected officials that can be used to clear up misinformation issues. We have to put the puzzle pieces together from former transportation studies it is part of the vigilance of being between two mighty rivers the Willamette and the Columbia.

Here is what has taken place:

> In the 1980's Oregon and Washington Legislators met and accepted the Federal Highway "F" rating Level Of Service (LOS) for the I-5 freeway in north Portland from I-84 to the I-5 bridges.
>
> In 2002 the I-5 Portland /Vancouver Transportation and Trade Partnership EIS recommended capacity across the Columbia River with a Supplemental **or** a Replacement bridge.
>
> In 2005 an independent I-5 bridge(s) inspection had a favorable report including the bridges having more than 60 years of life left.
>
> In 2002 the bridge alternative #8 adjacent to the BNSF rail line was recommended out of the I-5 Partnership EIS for further study not just a replacement bridge.
>
> The Columbia River Crossing EIS during NEPA Scoping identified *RC-14 Bi-State Industrial Corridor freeway adjacent to the BNSF rail line as an alternative. * Third Bridge Now

CRC staff stated in official documents and the video shows CRC staff removing RC-14 without process. CRC staff, not the Project Sponsor Council, CRC Signatory Agencies, legislative oversight committees, or the citizen's advisory CRC Task Force

Letters from the CRC Signatory Agencies and elected official that the NEPA Process was not followed, RC-14 was not studied or vetted.

It is a lie when ODOT – WADOT – and the Bridge Replacement Project say that Third Bridge Now freeway corridor was studied or vetted. It is also a lie to say EIS for the I-5 Partnership stated a Replacement Bridge only. The required NEPA Citizen Comment Period on the "Replacement Bridge Project" will be started soon. They need to hear from you that you want a thorough and honest study, that removing RC-14 was wrong, unfair, and won't be tolerated.

Transportation staff can't say theirs, "staff's idea is best" without comparing it to an alternative at lease as large and with comparable amenities as the only project they are studying. Comparing alternatives side by side to show how or why it works or not should not be "feared" by staff. It needs to be an enjoyable challenge that different alternatives being studied offer.

Metro a CRC Signatory Agency, President and Project Sponsor Council member David Bragdon letter date May 5, 2021 (B)
http://www.nobridgetolls.com/nasset/docs/B%20%20%20%20%209%20%20David%20Bragdon%20May%205.pdf
Metro a CRC Signatory Agency, President and Project Sponsor Council member David Bragdon letter date May 19, 2010 (A)
http://www.nobridgetolls.com/nasset/docs/A%2010%20DavidBragdonCRCReviewMay19.pdf

This link has 2 testimonies from citizen comment and Metro Councilor Brian Newman's comments on the CRC process https://www.youtube.com/watch?v=hBfc4rifWcc&t=332s

Third Bridge Now moving map link
https://www.youtube.com/watch?v=nzaMpNR-Wj8&t=1006s

RC-14 is www.ThirdBridgeNow.org

Social Injustice and Lack of Process
Report Summary

"The I-5 Bridges are in Pristine Condition"

I was sitting at the Washington Transportation Commission Hearing in 2005 in Olympia when the SW WA Transportation Director Don Wagner made that statement. During his report he stated the bridges had no restrictions, met all requirements, and the steel was as thick as the original specification called with no rust was found. He provided a document with the Oregon State Seal on top reporting that the bridges have more than 60 years of life left. The inspection titled The Interstate Bridges Electrical Upgrade Project had several favorable remarks concerning the quality and value of the Columbia River Crossing. (1)

2002 data stated. We have fewer bridges than similar sized metropolitans if we built two more bridges across the Columbia River we would still be in last place. The bridges are rated at 88,000 vehicle and they carry 135,000 –145,000 daily The bridge is not the problem This picture shows the I-5 freeway has a Level Of Service rating of F since the 1980's with approximately 30,000 vehicles daily cutting through the neighborhoods to avoid congestion. (2)

Six bridges in the Portland area are older than the 1917 I-5 bridge. Twelve are older than the 1958 I-5 twin bridge. To remove available infrastructure because of age goes against current policy of preserve and maintain basic engineering practice the federal and state motto.(3)

The Federal Register /Vol. 70, No. 186 /Tuesday, September 27, 2005 /Notices for the CRC describes the project fully, Study Area, and that All alternatives Must be studied Thoroughly benefits and impacts though construction and operations. (4)

St Johns' Review community newspaper Aug. 26, 2005
North Portland group expresses own ideas and solutions for improving I-5 traffic, by Gayla Patten (5)

Third Bridge Now freeway has the communities support
Celebrate North Portland Awards 2011 and 2017 (5b)

The Columbian newspaper Vancouver WA March 1, 2002
Selling the "Northwest Passage" by Thomas Ryll (6)

The importance of the Multnomah County Democratic Party 2020 Platform keep and maintain infrastructure when possible. The platform also identified having a third bridge constructed and open before any changes are made to the I-5 freeway bridges. (7)

I-5 Partnership summary recommendation page (8)

1. A Supplemental Bridge or Replacement Bridge (dependent on the bridges condition)
2. Add a lift the BNSF bridge for marine safety and 95% less on the I-5 bridges
3. Light rail loop in Clark County and bus routes
4. Additional heavy rail freight and commuter service

Description Third Bridge Now
New freeway corridor is fully multi-modal alignment starting at I-5 and Mill Plain in Vancouver, crossing into Oregon and going south through Swan Island I-5, I-84, I-405, and west to HWY-30.
Freeway
Speed 55 MPH
Lift No
High capacity on/off ramps Yes
Freeway 6-lanes 2000 per hour per lane
Managed 2-lanes 2000 per hour per lane
Heavy rail 2-track unknown
Third Bridge Now moving map link https://www.youtube.com/watch?v=nzaMpNR-Wj8&t=1006s

CRC presentation to Joint Oregon/Washington Transportation Commission "Original Project Scope" adding capacity across the Columbia River https://www.youtube.com/watch?v=CzQwLDHJo_M

Joint Senate CRC oversight committee Senator George and Senator Benton's comments GeorgeBentonAsk.avi.MP4 http://www.youtube.com/watch?v=7fI74enogME

Watch CRC staff remove RC-14 a community supported third bridge alternative without any process. ArchMiller_ReplaceBridge.avi.MP4 (9) http://www.youtube.com/watch?v=jdnbvv6Rtgg
This video is former Vancouver Port Commissioner Arch Miller telling the CRC Task Force advisory citizen committee to remove and not study the Third Bridge Corridor (RC-14) brought in during NEPA Scoping violate the NEPA EIS. The fact that an elected official would brazenly stand up and tell the official CRC Task Force and community that "HE" Thinks and What "HE" wants and what "HE" believes we MUST do as we are told! Totally scrap having a fair and honest process or a comparable alternative. Keeping information from the citizens by the government is a First Amendment violation.

This link has two testimonies from citizen comment and Metro Councilor Brian Newman's comments on the horrible treatment during the CRC process https://www.youtube.com/watch?v=hBfc4rifWcc&t=332s

Formal letters from CRC Signatory Sponsor Agencies and elected officials RC-14 was not studied or vetted in the CRC EIS Process!

1. November 15, 2010 SW Washington Regional Transportation Council (10)

2. October 28, 2010 CTRAN (11)

3. February 11, 2009 WA Senator Benton and with 12 signatures from elected official from Oregon and Washington (12) (13)

4. July 23, 2010 and again August 29, 2012 Clark County Board of Commissioners (14)

5. December 12, 2009 Clark County Commissioner Steve Stuart description email "Third Bridge" not studied a good explanation (15)

www.ThirdBridgeNow.org
Third Bridge Now moving map link https://www.youtube.com/watch?v=nzaMpNR-Wj8&t=1006s

Page three document links for numbers 1-15 on pages one and two.

"The I-5 Bridges are in Pristine Condition"
Links

(1) Columbia River Crossings commonly known as I-5 bridges
http://www.nobridgetolls.com/nasset/docs/H-(1)%20%20Bridge%20cond%20of%20I-5%20freeway%202005.JPG.pdf

(2) http://www.nobridgetolls.com/nasset/docs/G-6%20Freight%20and%20Port%20info%20Question%203.pdf

3) http://www.nobridgetolls.com/nasset/docs/H-(2)%20%20%20%20bridge%20ok%20list%20age%20of%20local%20bridges.pdf

(4) http://www.nobridgetolls.com/nasset/docs/I%20%20%20%20%20Fed%20Reg%20CRC%20good.pdf

(5) http://www.nobridgetolls.com/nasset/docs/com%203%20%20%20St%20Johns'%20good%20review%20copy.pdf

(5b) http://www.nobridgetolls.com/nasset/docs/com%207%20%20Awards%20-%20three.pdf

(6) http://www.nobridgetolls.com/nasset/docs/com%204%20SellingTheNWPassage.pdf

(7) http://www.nobridgetolls.com/nasset/docs/com%201%202020%20%20Mutl%20County%20Dem%20PlateformArticle%20XIII.pdf

(8) http://www.nobridgetolls.com/nasset/docs/EEE%20%20%20final_recc_at_glance.pdf

(9) http://www.youtube.com/watch?v=jdnbvv6Rtgg

(10) http://www.nobridgetolls.com/nasset/docs/PPP-(2)%20%20%20RTC%20letter%20TBN%20not%20studied.pdf

(11) http://www.nobridgetolls.com/nasset/docs/PPP-(3)%20%20%20CTRAN%20letter%20about%20TBN.pdf

(12) http://www.nobridgetolls.com/nasset/docs/PPP-(4)%20%20%20US%20Rep.pdf

(13) http://www.nobridgetolls.com/nasset/docs/PPP-(5)%20%20%20Not%20studied%20Sen%20Benton%20%2012%20letter.%20pdf.pdf

(14) http://www.nobridgetolls.com/nasset/docs/PPP-(6)%20%20BCCC%20formal%20letter%202010%20and%202012.pdf

(15) http://www.nobridgetolls.com/nasset/docs/PPP-(8)%20%20%20%20Steve%20Stuart%20letter%20explaing%20not%20studiedpdf.pdf

This link has 2 testimonies from citizen comment and Metro Councilor Brian Newman's comments on the CRC process https://www.youtube.com/watch?v=hBfc4rifWcc&t=332s
www.ThirdBridgeNow.org
Third Bridge Now moving map link https://www.youtube.com/watch?v=nzaMpNR-Wj8&t=1006s

IBR Draft SEIS - RECORD #3684 DETAIL

First Name :	Jordan
Last Name :	Lewis
Attachments :	DSEIS-3684_Lewis_Original.pdf (4 kb)

IBR Draft SEIS - RECORD #3684 DETAIL

Submission Date : 11/18/2024
First Name : Jordan
Last Name : Lewis
Business/Organization/Agency :

Submission Input :

First Name:
Jordan

Last Name:
Lewis

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Noise and Vibration

Comment:
I cannot find a past example of a freeway bridge with a parallel pedestrian path for this length, at this height, anywhere in the world. How can we be so sure this will be a pleasant experience for those who walk and roll? Will they be subject to intense wind and cold at that height? How loud will road noise be from above in the dual-layer truss bridge alternative? How many people walk across the pedestrian facilities of the Glenn Jackson Bridge (i-205) every day? How can we ask the public to comment on a pedestrian experience they have no reference for? Will the pedestrian path be sufficiently lighted and visible as to be safe for all users? And, will there be protections included day one to prevent jump attempts off of the bridge and its approaches?

To be clear, I think bike/ped facilities across the river are a necessary inclusion for any new river crossing; my concerns are with the placement and design of the path.

JCA comment #: 1024

IBR Draft SEIS - RECORD #3686 DETAIL

First Name :	Andrew
Last Name :	Schamber
Attachments :	DSEIS-3686_Schamber_Original.pdf (5 kb)

IBR Draft SEIS - RECORD #3686 DETAIL

Submission Date : 11/18/2024
First Name : Andrew
Last Name : Schamber
Business/Organization/Agency :

Submission Input :

First Name:
Andrew

Last Name:
Schamber

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Navigation

Comment:
The current state of the interstate bridge is, as a non-vehicular commuter/user, is completely unusable (for multiple different reasons) and I appreciate the efforts to consider users outside of vehicular modes of transport. However, there are some design flaws that, in my opinion, do not make this a viable replacement and should be reconsidered. The spiral path on the Washington side can easily be seen as a deterrent for cyclists as well as folks that require additional mobility assistance (wheelchair, push scooter, walker, etc). The terrain/elevation change coming from the north side of Vancouver to the bridge and then up to cross the bridge is not a sustainable design and should be reconsidered. This project is being completed in order to accommodate both vehicular and non-vehicular traffic and should reflect that in the final design. Additionally, there is an incredibly large missed opportunity with the connection from the IBR to the Vancouver/Williams district on the Oregon side. This area is gaining increasing traction and popularity and the connection, in its current state, 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 in order to bring revenue and business to this thriving area of NE Portland.

JCA comment #: 1023

IBR Draft SEIS - RECORD #3688 DETAIL

First Name :	Benjamin
Last Name :	Pedigo
Attachments :	DSEIS-3688_Pedigo_Original.pdf (4 kb)

IBR Draft SEIS - RECORD #3688 DETAIL

Submission Date : 11/18/2024
First Name : Benjamin
Last Name : Pedigo
Business/Organization/Agency :

Submission Input :

First Name:
Benjamin

Last Name:
Pedigo

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
Adding lanes will not solve traffic as has been shown many times. Please use these taxpayer dollars to fund projects that will get us closer to our climate goals instead of wasting them on more lanes that will get clogged up with cars as soon as they are completed.

JCA comment #: 1022

IBR Draft SEIS - RECORD #3690 DETAIL

First Name :	James
Last Name :	Shelstad
Attachments :	DSEIS-3690_Shelstad_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #3690 DETAIL

Submission Date : 11/18/2024
First Name : James
Last Name : Shelstad
Business/Organization/Agency :

Submission Input :

First Name:
James

Last Name:
Shelstad

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
This bridge is a project that's going to last us far into the future - it needs to be designed and built with realistic concerns for the future in mind, not ideas about expanding highways for private vehicles from last century. This means integrating transit, active transportation, and multimodal infrastructure that's well-done, connected, and realistically invites everyday use - not forcing people to go far out of their way unless they're in a car; not building transit facilities for today's ridership but freeways to meet presumed skyrocketing driving demand. We have the chance to design for the future we want to see, the future that meets city- and state-wide climate and sustainable development goals, and if we don't do that, so much of the money going to this project will be a waste if not an active contribution to failing the future of the region. Just Crossing Alliance provides a valuable selection of specific, actionable constructive criticisms of the current project that fit what we know through

research about the impact of transportation policy decision: please incorporate them.

JCA comment #: 1021

IBR Draft SEIS - RECORD #3692 DETAIL

First Name :	Daniel
Last Name :	Reimer
Attachments :	DSEIS-3692_Reimer_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #3692 DETAIL

Submission Date : 11/18/2024
First Name : Daniel
Last Name : Reimer
Business/Organization/Agency :

Submission Input :

First Name:
Daniel

Last Name:
Reimer

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
The IBR should not be adding extra auxiliary lanes especially without justification and especially without any consideration of induced demand.
The bike path should be conveniently accessible to the MAX stop.
There needs to be plans for heavy rail or more robust bus transit between Vancouver and Portland.

JCA comment #: 1020

IBR Draft SEIS - RECORD #3694 DETAIL

First Name :	James
Last Name :	Shelstad
Attachments :	DSEIS-3694_Shelstad_Original.pdf (3 kb)

IBR Draft SEIS - RECORD #3694 DETAIL

Submission Date : 11/18/2024
First Name : James
Last Name : Shelstad
Business/Organization/Agency :

Submission Input :

First Name:
James

Last Name:
Shelstad

Email:
[redacted]

Topic Area:
Hayden Island Issues

Comment:
The lack of consideration this project has given to the stated needs of Hayden Island residents - the people whose homes and businesses the project will be building on and directly affecting for upwards of a decade - is frankly shameful. Imposing daily quality-of-life issues, a loss of property value, and then mandatory tolls for using the main method of leaving the island, without any significant mitigation efforts, isn't how we should be treating neighbors, especially those with low and fixed incomes.. Hayden Islanders have been trying to get the people in charge of successive bridge update projects to listen to and address their needs for over 10 years now: it's time to actually do that, not blithely ignore the human cost of such an expansive undertaking.

JCA comment #: 1029

IBR Draft SEIS - RECORD #3695 DETAIL

First Name :	Vinayaka
Last Name :	Thompson
Attachments :	DSEIS-3695_Thompson_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #3695 DETAIL

Submission Date : 11/18/2024
First Name : Vinayaka
Last Name : Thompson
Business/Organization/Agency :

Submission Input :

First Name:
Vinayaka

Last Name:
Thompson

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
Hi I have been watching this plan unfold since the beginning and see ibr folks posing this imposing megastructure as a win for the community and the environment just cause it has a walking path and a train line. I however have seen no efforts in how they will make it usable or tie it in practically with existing destinations. The spirals on both ends make it look like it will be a hostile no mans land. No clear indicator was given regarding connection to transit not does it seem any thought was given to how pleasant it would be to use. It

seems to me that light rail and pedestrian paths were tacked on as an afterthought to green wash this road widening project. A bridge that high and practically 5 lanes in each direction (when counting the full lane wide shoulders) is impractically large and in of its self a wasteful use of our limited budget. Not only that, there are excessive widening projects tacked on that totally have nothing to do with creating a earthquake resistant crossing. The traffic model it's based on was flawed and the alternatives investigated were rigged. It seems to me this project is determined to be forced on Oregonians without looking for a more just and actually climate sensitive alternative. I know we need to replace the aging bridges however this bridge is not the solution. It's too big, it's too ugly, it is too car centric and it's hiding too much freeway expansion. Please actually look at alternatives that make pedestrians bikers and transit users first class citizens on this infrastructure project.

JCA comment #: 1028

IBR Draft SEIS - RECORD #3697 DETAIL

First Name :	Hanna
Last Name :	Osman
Attachments :	DSEIS-3697_Osman_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #3697 DETAIL

Submission Date : 11/18/2024
First Name : Hanna
Last Name : Osman
Business/Organization/Agency :

Submission Input :

First Name:
Hanna

Last Name:
Osman

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
I am against the IBR because it feels like a plan that wasn't genuine and did not stick to its promise from the beginning. I do not think we should have this and put a pause on it because it's not giving what it was suppose to be.

JCA comment #: 1027

IBR Draft SEIS - RECORD #3699 DETAIL

First Name :	Zachary
Last Name :	Lauritzen
Attachments :	DSEIS-3699_Lauritzen_Original.pdf (169 kb) OregonWalksIBRcommentNov2024.docx.pdf (160 kb)

IBR Draft SEIS - RECORD #3699 DETAIL

Submission Date :	11/18/2024
First Name :	Zachary
Last Name :	Lauritzen
Business/Organization/Agency :	Oregon Walks
Attachments :	OregonWalksIBRcommentNov2024.docx.pdf (160 kb)

Submission Input :

First Name:
Zachary

Last Name:
Lauritzen

Business or Organization:
Oregon Walks

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
Please see the attached letter.

Attachment (maximum one):
Oregon-Walks-IBR-comment-Nov-2024.docx.pdf

JCA comment #: 1026

PROTECTING YOUR RIGHT TO ROAM

November 18th, 2024

To: Interstate Bridge Replacement

Re: NEPA Comment

Dear Interstate Bridge Replacement Team,

My name is Zachary Lauritzen and I am the executive director Oregon Walks. Founded in 1991, Oregon Walks is a pedestrian advocacy organization that advocates for safer, more accessible, and human-centered streets. We believe communities are healthier and our environmental outcomes are better when we make investments so that kids can walk to school and the park, where our older adults can age in place as they can no longer drive, where people with mobility challenges can still get around their community with dignity and access, and where everyone can meet their daily needs on foot. Please accept and record the following comments about the interstate bridge replacement environmental impact statement.

To meet our climate goals, it is critical that the new bridge exceeds non-vehicular travel goals. For that to happen, the project must be designed to meet the needs of everyone, from eight to eighty years old, regardless of their ability level, and for active transportation route design to prioritize non-car users. **The current design does not meet these thresholds.** The following comments outline various barriers embedded in the current design that prioritize walking and transit.

Elevation and Out-of-Direction Travel

The elevation of the multi-use path crossing the Columbia River is of significant concern. It is unreasonable to consider walking and rolling a project priority when accessing the path requires a ½ mile, 4.5% grade ramp on the Vancouver waterfront. This is a significant barrier and is ableist in design. If the multi-use path cannot be lowered, then robust, well-maintained elevators with an operations, maintenance, and funding plan must be in place.

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Sincerely,



Zachary Lauritzen
Executive Director
Oregon Walks

PROTECTING YOUR RIGHT TO ROAM

November 18th, 2024

To: Interstate Bridge Replacement

Re: NEPA Comment

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Thank you for your consideration.

Sincerely,



Zachary Lauritzen
Executive Director
Oregon Walks

IBR Draft SEIS - RECORD #3701 DETAIL

First Name :	Catherine
Last Name :	Sireno
Attachments :	DSEIS-3701_Sireno_Original.pdf (87 kb)

IBR Draft SEIS - RECORD #3701 DETAIL

Submission Date : 11/18/2024
First Name : Catherine
Last Name : Sireno
Business/Organization/Agency :

Submission Input :

First Name:
Catherine

Last Name:
Sireno

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
Hello, . As you know Climate change is an existential threat. Every government action should keep this in mind. That being said, The new I-5 bridge can be a shining star and an example of multimodal travel. It needs to have a welcoming and user-friendly bike/walking path. Commuters their own car should not be prioritized over other means of travel. In order for this to happen I am in agreement with the suggestions of Oregon walks and the Street Trust. I agree that the multimodal path should be accessible to the light rail. I think that the current plan to have a 100 foot path down to the ground from the bike path is obscene.Travel by foot/bike or transit should be prioritized not punished with a grueling climb.

Additionally I humbly request that along the multimodal lane that there are rest points. It would be so amazing to have multiple bump outs large enough for 5 people to stand out of the way of travel and to rest and take in the views. This bridge can be an asset and attraction. Having areas for benches and informative plaques would be an educational tool and allow for travelers to have a unique view. I encourage you to think about 50 years from now traveling on the bridge and noting what you are so thankful the planners included. The sellwood

bridge and tilikum bridge both have these and they could be even better.

I think there should be a toll system so that the users have to cover some of the costs. There should be excemptions for low income individuals and residents of Hayden island to get from the island to oregon. This would be a better solution than having a separate bridge for Hayden island.

Thankyou for all your hard work. I am excited to see the best version we can have.

JCA comment #: 1025

IBR Draft SEIS - RECORD #3703 DETAIL

First Name :	Zachary
Last Name :	Lauritzen
Attachments :	DSEIS-3703_Lauritzen_Original.pdf (168 kb) Oregon_Walks_IBR_comment_Nov_2024.docx.pdf (160 kb)

IBR Draft SEIS - RECORD #3703 DETAIL

Submission Date :	11/19/2024
First Name :	Zachary
Last Name :	Lauritzen
Business/Organization/Agency :	
Attachments :	Oregon_Walks_IBR_comment_Nov_2024.docx.pdf (160 kb)

Submission Input :

Please see the attached letter.

Warm regards,
Zachary

[redacted]
Executive Director
Oregon Walks
www.oregonwalks.org

PROTECTING YOUR RIGHT TO ROAM

November 18th, 2024

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Re: NEPA Comment

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Executive Director
Oregon Walks

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Zachary Lauritzen
Executive Director
Oregon Walks

IBR Draft SEIS - RECORD #3704 DETAIL

First Name :	Andrew
Last Name :	Schamber
Attachments :	DSEIS-3704_Schamber_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #3704 DETAIL

Submission Date : 11/18/2024
First Name : Andrew
Last Name : Schamber
Business/Organization/Agency :

Submission Input :

First Name:
Andrew

Last Name:
Schamber

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Environmental Justice

Comment:
On the Oregon side, while the connection to the Kenton neighborhood appears reasonably robust (which leads into an affluent area of North Portland), the connections to the MLK corridor area leave less to be desired. While I understand that both the Kenton neighborhood and the businesses/residences in the MLK corridor share the same zip code the socioeconomic status of the residents in both of those areas are drastically different. When considering the Environmental Justice tool from EPA, the EJ40, it will spit out the same results

for both areas. While I understand that this is a common tool when seeking equality, it's just a tool. The demographics of the Kenton area is far different than the MLK corridor when considering socioeconomic factors such as people of color, low-income, limited english speaking population, under age 5 and over age 64. The current design alienates those that either work or reside in the MLK corridor and surrounding areas and appears to lean towards accommodating those that live and or work in the more affluent areas of NE/N Portland. The area on the East side of I-5 has been and currently still is a lower income area and predominately non-white presenting. Further alienation of that community will further perpetuate a divide and place unnecessary sideboards on those that need to commute in and out of the area.

JCA comment #: 1033

IBR Draft SEIS - RECORD #3706 DETAIL

First Name :	Bradley
Last Name :	Bondy
Attachments :	DSEIS-3706_Bondy_Original.pdf (4 kb)

IBR Draft SEIS - RECORD #3706 DETAIL

Submission Date : 11/18/2024
First Name : Bradley
Last Name : Bondy
Business/Organization/Agency :

Submission Input :

First Name:
Bradley

Last Name:
Bondy

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Other

Comment:
This is a massive project, and that inherently means there's risk of unforscene obstacles and cost escalation. If this project goes forward it must be a phased project; with the only critical component, the bridge replacement itself, being built first before the rest of the freeway expansion and junction changes. The region will be just fine without rebuilt interchanges, but the bridges do need replacing.

JCA comment #: 1032

IBR Draft SEIS - RECORD #3708 DETAIL

First Name :	Rj
Last Name :	Sheperd
Attachments :	DSEIS-3708_Sheperd_Original.pdf (56 kb) IBR_Public_Comment__Richard_Sheperd.pdf (49 kb)

IBR Draft SEIS - RECORD #3708 DETAIL

Submission Date :	11/19/2024
First Name :	Rj
Last Name :	Sheperd
Business/Organization/Agency :	
Attachments :	IBR_Public_Comment__Richard_Sheperd.pdf (49 kb)

Submission Input :

Please see my comments attached.

Richard Sheperd
[redacted]

To Whom It May Concern:

The Interstate Bridge Replacement (IBR) project is anything but a simple bridge replacement. The project scope has expanded well beyond a bridge replacement to include building seven new interchanges, in an attempt to address "congestion" through the project area.

What further analysis of the project has shown is that the IBR with its seven new interchanges will not, in fact, address the congestion. That congestion will simply move upstream and downstream of the project[1]. The IBR project team has also way overestimated the amount of truck traffic by 70%, which is declining year-over-year[2]. Put simply: these numbers are made up, and the EIS should be immediately scrapped on those false claims. Furthermore, it ignores any induced demand effects.

The other reason provided by the IBR team to rebuild the interchanges, particularly on Hayden Island, is in order to accommodate a bridge height to meet requirements for the US Coast Guard. However, this new height still does not suit the Coast Guard's needs. To attempt to meet this requirement, the IBR proposes a 4% grade, which will make this bridge one of the steepest in the nation. When there is freezing rain and trucks and cars attempt to exit the cloverleaf exit into Vancouver off a 4% grade, they will skid off the off-ramp into the neighborhoods adjacent to them. Trucks are not even being given a runaway ramp or other device in case they cannot control themselves down the grade. This is a deadly hazard that cannot be addressed with this design.

In an attempt to green-wash this 10-lane highway expansion mislabeled as a "bridge replacement" project, Oregon DOT is proposing to expand the Light-Rail across the river to Vancouver, Washington, and to provide a wider fully-separated multi-use path for people walking and biking. What the current design requires is for people walking or biking to climb a spiral ramp longer than a half-mile, which is absurd. The current bridge maintains direct access to the Vancouver waterfront and Hayden Island, by comparison. When it rains and iced over, the proposed bridge would become hazardous for people cycling, as they would need to feather their brakes for over a half-mile just to avoid hitting the wall and falling into the Columbia river. People who drive across the I-205 bridge already deal with extreme winds whipping at them, and that bridge is only at 144 ft. This highway expansion project will lead to worse conditions for people taking transit, walking and rolling.

The current design proposes stations that are over a hundred feet in the air, with the only means of accessing the stations by elevators. I can tell you, personally, that there are many instances in our region when elevators used to access MAX stops go out. If the current design stands where the MAX stations are being placed on the opposite side of the bridge, you will be trapped on the station platform with nowhere to go. This is a dangerous situation for the public. At the

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[1] https://www.wweek.com/news/2024/11/11/expert-says-traffic-modeling-for-interstate-bridge-replacement-is-wrong/

[2] https://cityobservatory.org/inventing-millions-of-phantom-trucks-to-sell-a-wider-bridge/

very least, the multi-use path should be on the same side of the MAX to provide redundancy when the elevators break down.

The Pacific Northwest already has issues with people camping underneath highways and ramps. This spiral ramp will become filled with people camping and using the ramp to escape the elements. The EIS does not mention that the large spiral ramps will lead to massive encampments, which will make this ramp unusable. This makes this design incompatible with one of the major goals of this project.

Additionally, the project team seems unaware that this project is incompatible with the current proposal for Ultra High Speed Rail (HSR) in the median of I-5. The Cascades Ultra-HSR is a federally funded project, and has been on the books for decades. This design would prevent the High-Speed Rail project from being realized.

Finally, large bridge spans are not appropriate when dealing with the Cascadia subduction zone. The immense pylons that will need to be driven in the river will severely damage the ecosystem, and it will not result in a truly earthquake proof structure.

What the project needs is to be completely scrapped. The project barely stands up to scrutiny, which is why the IBR team has had to spend tens of millions of dollars feeding lies to the public. We are going to end up with a bridge that is dangerous to people walking, biking, taking transit, and driving. It will not only not address congestion, but it will also severely damage the connectivity of the folks living on Hayden Island, an already neglected community in North Portland made up of longtime residents on fixed incomes.

If this project were to move forward, it must stop trying to ram a 10-lane highway through North Portland, and should respect Hayden Island and the billions of dollars that the City of Vancouver has invested into its waterfront

Rather than build a new bridge, we must take seriously the proposal to build an immersed tube tunnel (ITT) for automobile traffic, while preserving the lift bridge as a historical bridge for use by Light Rail, High-Speed Rail, and people walking and biking. This option was not adequately evaluated, and continues to be sidelined by WSP. An ITT is not only able to address the issues related to the Coast Guard's height issue, it is actually a much safer option for earthquakes. Japan is well known for earthquakes, and Tokyo alone features seven ITTs. To find an example very close to home, Vancouver, BC is currently building the Frasier ITT[3], which is virtually identical to the tunnel that we could build in Portland.

The advantage of using an ITT for automobile traffic, while keeping the old bridge is to preserve it as a historical artifact, and to provide a water-level connection between Hayden Island and Vancouver, WA. This would increase the tourism and beauty of the Columbia River, rather than deliver a constant din of traffic noise and emissions to the nearby residents and those enjoying

[3] https://engage.gov.bc.ca/fraserrivertunnel/about-the-project/

the waterfront. No estimate has been made on the increased deaths that will be caused by noise pollution of these nearby residents waking them and shaking their homes at odd hours.

The new approach with the ITT should also realize a vision for the MAX that relies on longer 4-car trains, as there is currently work being done to realize a light-rail tunnel through the Downtown to offer increased speed and reliability. These stations will finally allow us to offer longer cars, since the maximum length of trains is limited due to the size of our downtown stations.

The reason the project team ignored the ITT is due to WSP's negligence and nonsense claims. They continue to ignore the evidence that the ITT while preserving the current bridge for transit and active transportation because they are fixated on addressing congestion, even though there is ample evidence already shown that highway widening never fixes congestion The icing on this awful-tasting cake is the fact that dozens of homes and businesses will need to be demolished. This region put an end to bulldozing homes for highway expansion back in the 1970's, and it is inhumane to sacrifice more homes when we have the technology to provide safer and more efficient transportation methods compared to automobiles. We should not displace the 33 "high-priority low-income" residents in Esther Short, nor the 33 businesses identified as high-priority in the project area.

Please deny the EIS, and work with the community to establish a path forward using an Immersed Tube Tunnel and preserving the existing historical bridge, rather than leveling a neighborhood to ram a 10-lane highway through it.

Sincerely,
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[2] https://cityobservatory.org/inventing-millions-of-phantom-trucks-to-sell-a-wider-bridge/

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Sincerely,
Richard Sheperd

IBR Draft SEIS - RECORD #3709 DETAIL

First Name :	Walter
Last Name :	Lersch
Attachments :	DSEIS-3709_Lersch_Original.pdf (4 kb)

IBR Draft SEIS - RECORD #3709 DETAIL

Submission Date : 11/18/2024
First Name : Walter
Last Name : Lersch
Business/Organization/Agency :

Submission Input :

First Name:
Walter

Last Name:
Lersch

Business or Organization:
[redacted]

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
The plan needs to include safe, efficient, convenient, transport mode appropriate bicycle (and pedestrian) features. Success here will encourage active transportation mode commuting, local resident sightseeing and exercise activities and business travelers exploring the areas renowned bicycling infrastructure. Yes, business travelers and tourists rent bicycles and go exploring. To many, a forty-mile ride is the beginning of a good day.

JCA comment #: 1031

IBR Draft SEIS - RECORD #3711 DETAIL

First Name :	Edward
Last Name :	Conlow
Attachments :	DSEIS-3711_Conlow_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #3711 DETAIL

Submission Date : 11/18/2024
First Name : Edward
Last Name : Conlow
Business/Organization/Agency :

Submission Input :

First Name:
Edward

Last Name:
Conlow

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
The Interstate Bridge Replacement DEIS is insufficient and needs to be reworked to provide more realistic traffic modeling, provide greater analysis regarding possible benefits of enhanced transit options, and deeper analysis on pricing policy, tolling equity, and the health effects of projected increased traffic. Also, the DEIS does not provide credible rationale for a second auxiliary lane.

JCA comment #: 1030

IBR Draft SEIS - RECORD #3714 DETAIL

First Name :	Bart
Last Name :	Jackson
Attachments :	DSEIS-3714_Jackson_Original.pdf (3 kb)

IBR Draft SEIS - RECORD #3714 DETAIL

Submission Date : 11/18/2024
First Name : Bart
Last Name : Jackson
Business/Organization/Agency :

Submission Input :

First Name:
Bart

Last Name:
Jackson

Email:
[redacted]

Topic Area:
Transportation

Comment:
I find the current plan insufficient in support for bicycles and walking. Those modes need to be well connected to both ends of the bridge on both east and west sides of the bridge. This would make the bridge much more accessible to these modes and connect them to the users of these modes. In addition, this would allow easy access to the MAX train station, which is on only one side of the bridge. The stated goal for the new bridge is reducing congestion and earthquake resilience. The current design achieves only one of those goals, earthquake resilience. The only way to reduce congestion is to reduce car and truck traffic by making other modes more attractive. See studies of induced demand.

JCA comment #: 1038

IBR Draft SEIS - RECORD #3715 DETAIL

First Name :	Emily
Last Name :	Kemper
Attachments :	DSEIS-3715_Kemper_Original.pdf (5 kb)

IBR Draft SEIS - RECORD #3715 DETAIL

Submission Date : 11/18/2024
First Name : Emily
Last Name : Kemper
Business/Organization/Agency :

Submission Input :

First Name:
Emily

Last Name:
Kemper

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
I am writing to encourage those who are working on the IBR project - a massive undertaking, to be sure, and upon which the economic future of the Pacific Northwest weighs heavily - to please remember that we are talking about an incredibly long-lasting piece of infrastructure. I wonder about the people who built the original bridge - did they think it would be in use for over 100 years? How could they have known that car use would explode the way that it did, or that people would willingly give up hours of every day going back and forth over

that bridge? Entire months, perhaps even years of people's lives, spent going back and forth over a bridge that likely wasn't designed for a fraction of the traffic it sees now...

I encourage you to think far into the future, another 100 years from now, and to think about how our great grandchildren might use this structure. Think about how, in their lifetimes, they have probably experienced more climate calamities than we could have imagined and yet couldn't be bothered to prevent. Think back to how, in our own parents' childhoods, as cars began choking up every new lane of road that was built, leaded gasoline poisoned the air that people who lived next to highways breathed. And yet, somehow they were still the lucky ones since they were not forced out of homes that were demolished to build highway on-ramps. Finally, think about how, in the late 1940's to early 1950's, Robert Moses, considered a hero by many city planners even still today, made sure that highways connecting Long Island, New York, with the mainland had no room for public transit lines, and that overpasses were too low for buses, thus sentencing residents of Long Island to decades in a pastoral prison.

In other words, please plan as if you live in a society in the year 2024, and that improving people's lives and building infrastructure with climate resilience in mind are not mutually exclusive concepts. Please plan for every imaginable form of transit, please consider impacts to nearby residents, and please prioritize health, safety, and environmental benefits. Thank you.

JCA comment #: 1037

IBR Draft SEIS - RECORD #3717 DETAIL

First Name :	Aron
Last Name :	Wagner
Attachments :	DSEIS-3717_Wagner_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #3717 DETAIL

Submission Date : 11/18/2024
First Name : Aron
Last Name : Wagner
Business/Organization/Agency :

Submission Input :

First Name:
Aron

Last Name:
Wagner

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
I bike from my home in Portland to Vancouver to see friends frequently. Biking, walking, and MAX transit should all be on the same side of the bridge. I like to be able to move fluidly between riding my bike and hauling it onto the MAX. Non-vehicle traffic (pedestrian, cycling, and public transit) should get priority and preference. Highways and bridges that cater to cars first with everything else as a distant afterthought just amount to more cars on the road and more traffic in the longrun.

JCA comment #: 1036

IBR Draft SEIS - RECORD #3719 DETAIL

First Name :	Micah
Last Name :	Meskel
Attachments :	DSEIS-3719_Meskel_Original.pdf (180 kb) BAODSEISCommentLetter111824.docx1.pdf (171 kb)

IBR Draft SEIS - RECORD #3719 DETAIL

Submission Date :	11/18/2024
First Name :	Micah
Last Name :	Meskel
Business/Organization/Agency :	Bird Alliance of Oregon
Attachments :	BAODSEISCommentLetter111824.docx1.pdf (171 kb)

Submission Input :

First Name:
Micah

Last Name:
Meskel

Business or Organization:
Bird Alliance of Oregon

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Ecosystems

Comment:
Please accept the attached comments from the Bird Alliance of Oregon.

Attachment (maximum one):
BAO-DSEIS-Comment-Letter-11-18-24.docx-1.pdf

JCA comment #: 1035

To: Interstate Bridge Replacement Program
From: Bird Alliance of Oregon
Date: November 18, 2024
Re: Bird Alliance of Oregon's Comment on Draft Supplemental EIS

Bird Alliance of Oregon is a 501(c)(3) nonprofit conservation organization. We were founded in 1902. Our mission is to inspire all people to love and protect nature. Today we are one of the largest chapters of the National Audubon Society in the United States with over 45 staff, 600 active volunteers and 12,000 members. We work across the State of Oregon to protect native wildlife and the habitats on which they depend and to engage communities in conservation. Our activities include conservation policy, environmental education, running Oregon's busiest wildlife hospital and managing wildlife sanctuaries in Portland, at the Oregon Coast and on Mt. Hood.

Bird Alliance of Oregon focuses its conservation efforts in three primary areas:

- creating the greenest metropolitan area in the United States
- protecting birds across the landscape, and
- climate change mitigation and adaptation.

Bird Alliance of Oregon has long been recognized as a national and international leader in that arena of urban conservation. We work at multiple scales in the Portland Metropolitan Region to achieve our objectives including restoring and certifying urban and suburban habitat the backyard and neighborhood scale (over 13,000 properties currently enrolled in the program), green infrastructure and sustainable stormwater management, building the region's system of parks, trails and natural areas, and landscape scale, long-range land use planning.

While we appreciate the need for seismic resilience in this important interstate connection and are enthusiastic about the opportunity for transit and active transportation connections, we find that this project is not, as advertised, a bridge replacement but rather a five mile freeway widening that has significant impacts on destroying wildlife habitat, increasing emissions, and wasting valuable taxpayer resources.

Many of our allies in the Just Crossing Alliance have submitted detailed comments about various aspects of this project. This letter is intended as an overview summary to tie all of these together in five main themes:

- The need for more credible traffic modeling

- Maximizing the potential of active transportation and transit
- A need for stronger pricing policy and tolling equity
- Health impacts
- Right Sizing the project

The need for more credible traffic modeling

In our view the traffic modeling for this project fails on two major points: the no-build traffic is grossly overestimated and the Modified Locally Preferred Alternative (MLPA) traffic is likely underestimated.

The DSEIS essentially asserts the same demand for person trips in both alternatives and simply reassigns them to different modal and lane configurations.

Maximizing the potential of transit and active transportation

We are happy to see active transportation and high-capacity transit connections established across the Columbia River but believe the connections fall far short of what could or should be achieved. We are submitting a separate vision document with detailed recommendations, but in summary:

- The Light Rail configuration is sufficient for opening day of the bridge, but should be designed to accommodate the volume and frequency of service that will be required when the bottleneck at the Steel Bridge is eventually addressed with a transit tunnel under the Willamette River and downtown Portland, something we hope will occur before the 2045 horizon year of the DSEIS. Specifically, stations in the IBR project area should be dimensioned to support four-car trains.

- Beyond the horizon year we anticipate the need for higher capacity modes of transit (e.g., multi-lane BRT or heavy rail) to accommodate passenger movement demand. We should be considering now as we design the physical structure of the bridge how these might be put in place later in the service life of the structure.

- 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.

- Active transportation connections must be extended deeper into the community on both sides of the river, at least as far as Evergreen in downtown Vancouver and connecting to the popular Vancouver/Williams corridor in Portland.

Need for stronger pricing policy and tolling equity

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.

Health and Equity impacts

We have been told to anticipate that disappointingly the Health Analysis for the project will not be published until the final week of the comment period. From what we have read in the executive summary it seems clear that most of the results are based on what we view as faulty VMT analysis as discussed above, meaning they are not reliable or useful.

Nonetheless it is apparent that the increase in traffic in either alternative will have negative health consequences for all populations.

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.

Right-sizing the project

We believe the SDEIS analysis does not provide justification for a second auxiliary lane.

We also continue to believe that this project would be much more appropriate if it were simply a bridge replacement with transit and active transportation connections, rather than a five mile freeway expansion.

Micah Meskel
Assistant Director of Urban Conservation
Bird Alliance of Oregon

To: Interstate Bridge Replacement Program
From: Bird Alliance of Oregon
Date: November 18, 2024
Re: Bird Alliance of Oregon's Comment on Draft Supplemental EIS

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Micah Meskel
Assistant Director of Urban Conservation
Bird Alliance of Oregon

IBR Draft SEIS - RECORD #3721 DETAIL

First Name :	Andrew
Last Name :	Schamber
Attachments :	DSEIS-3721_Schamber_Original.pdf (4 kb)

IBR Draft SEIS - RECORD #3721 DETAIL

Submission Date : 11/18/2024
First Name : Andrew
Last Name : Schamber
Business/Organization/Agency :

Submission Input :

First Name:
Andrew

Last Name:
Schamber

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Climate Change

Comment:
As we can see that climate change is an omni present issue that affects the entire globe, the Climate section of the DSEIS does not adequately address this important issue. It 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.

JCA comment #: 1034

IBR Draft SEIS - RECORD #3723 DETAIL

First Name :	Sharon
Last Name :	Nasset
Attachments :	DSEIS-3723_Nasset_Original.pdf (36 kb) 4 The I-5 Bridges are Pristinee Full April 2024 .pdf (25 kb)

IBR Draft SEIS - RECORD #3723 DETAIL

Submission Date :	11/19/2024
First Name :	Sharon
Last Name :	Nasset
Business/Organization/Agency :	
Attachments :	4 The I-5 Bridges are Pristinee Full April 2024 .pdf (25 kb)

Social Injustice and Lack of Process
Report Summary

"The I-5 Bridges are in Pristine Condition"

I was sitting at the Washington Transportation Commission Hearing in 2005 in Olympia when the SW WA Transportation Director Don Wagner made that statement. During his report he stated the bridges had no restrictions, met all requirements, and the steel was as thick as the original specification called with no rust was found. He provided a document with the Oregon State Seal on top reporting that the bridges have more than 60 years of life left. The inspection titled The Interstate Bridges Electrical Upgrade Project had several favorable remarks concerning the quality and value of the Columbia River Crossing. (1)

2002 data stated. We have fewer bridges than similar sized metropolitans if we built two more bridges across the Columbia River we would still be in last place. The bridges are rated at 88,000 vehicle and they carry 135,000 –145,000 daily The bridge is not the problem This picture shows the I-5 freeway has a Level Of Service rating of F since the 1980's with approximately 30,000 vehicles daily cutting through the neighborhoods to avoid congestion. (2)

Six bridges in the Portland area are older than the 1917 I-5 bridge. Twelve are older than the 1958 I-5 twin bridge. To remove available infrastructure because of age goes against current policy of preserve and maintain basic engineering practice the federal and state motto.(3)

The Federal Register /Vol. 70, No. 186 /Tuesday, September 27, 2005 /Notices for the CRC describes the project fully, Study Area, and that All alternatives Must be studied Thoroughly benefits and impacts though construction and operations. (4)

St Johns' Review community newspaper Aug. 26, 2005
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The importance of the Multnomah County Democratic Party 2020 Platform keep and maintain infrastructure when possible. The platform also identified having a third bridge constructed and open before any changes are made to the I-5 freeway bridges. (7)

I-5 Partnership summary recommendation page (8)

1. A Supplemental Bridge or Replacement Bridge (dependent on the bridges condition)
2. Add a lift the BNSF bridge for marine safety and 95% less on the I-5 bridges
3. Light rail loop in Clark County and bus routes
4. Additional heavy rail freight and commuter service

Description Third Bridge Now
New freeway corridor is fully multi-modal alignment starting at I-5 and Mill Plain in Vancouver, crossing into Oregon and going south through Swan Island I-5, I-84, I-405, and west to HWY-30.
Freeway
Speed 55 MPH
Lift No
High capacity on/off ramps Yes
Freeway 6-lanes 2000 per hour per lane
Managed 2-lanes 2000 per hour per lane
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2. October 28, 2010 CTRAN (11)

3. February 11, 2009 WA Senator Benton and with 12 signatures from elected official from Oregon and Washington (12) (13)

4. July 23, 2010 and again August 29, 2012 Clark County Board of Commissioners (14)

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www.ThirdBridgeNow.org
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Page three document links for numbers 1-15 on pages one and two.

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(7) http://www.nobridgetolls.com/nasset/docs/com%201%202020%20%20Mutl%20County%20Dem%20PlateformArticle%20XIII.pdf

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IBR Draft SEIS - RECORD #3724 DETAIL

First Name :	Indi
Last Name :	Namkoong
Attachments :	DSEIS-3724_Namkoong_Original.pdf (324 kb) VerdeIBRDSEISCommentFullText.pdf (319 kb)

IBR Draft SEIS - RECORD #3724 DETAIL

Submission Date :	11/18/2024
First Name :	Indi
Last Name :	Namkoong
Business/Organization/Agency :	Verde
Attachments :	VerdeIBRDSEISCommentFullText.pdf (319 kb)

Submission Input :

First Name:
Indi

Last Name:
Namkoong

Business or Organization:
Verde

Email:
[redacted]

Phone:
[redacted]

City:
Portland

US States:
OR

Zip:
97218

Topic Area:
Transportation

Comment:
The inclusion of robust public and active transportation infrastructure will be critical to ensuring that this project does not leave communities on both sides of the river behind. As our partners in the Just Crossing Alliance have put it, the DSEIS indicates that this project's "[mobility] 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". Public and active transportation are some of the best tools we have to begin to correct that imbalance. Equity priority communities, including the low-income Oregonians of color that Verde serves, often rely more heavily on non-auto modes of transportation and often face barriers to access. Without robust, future-proofed investments in public and active transportation options, the project risks perpetuating existing disparities and providing a lackluster return on investment in the coming decades. We urge that these components be fully integrated and prioritized in the final design, in line with the Just Crossing Alliance's Active Transportation and Transit Vision document as well as the work of the Active Transportation Working Group.

Attachment (maximum one):
Verde-IBR-DSEIS-Comment-Full-Text.pdf

JCA comment #: 1043

4145 NE Cully Blvd, Building B, Portland, OR 97218
(503) 290-8570 | www.verdenw.org

November 18, 2024

IBR Program Draft SEIS
c/o Chris Regan
500 Broadway Street, Suite 200
Vancouver, WA 98660

Dear Mr. Regan and IBR Program Staff,

My name is Indi Namkoong; I am the Transportation Justice Coordinator for Verde. Verde's mission is to serve communities by building environmental wealth through social enterprise, outreach, and advocacy. We were born in 2005 in NE Portland's Cully neighborhood, a neighborhood with more than its share of poverty and less than its share of environmental assets. Cully is called home by many Black, Indigenous, and other people of color, with a highly visible Latinx population. It includes the most racially/ethnically diverse Census tract in Oregon. This is both where we do our place-based work and a symbol of the environmental justice communities we advocate for and with statewide.

The Interstate Bridge Replacement is a once-in-a-generation investment for our region. It could be an opportunity to make a downpayment on a thriving region and a more equitable transportation system, but our communities know this is far from a guarantee. A legacy of car-centric and overbuilt transportation infrastructure investments in our region has left polluted air, heat islands, unsafe streets, and scarce transit connections for neighborhoods like Cully and other communities of color, low-income communities, rural communities, and more across the state who share these challenges. Projects like this one have promised more good jobs, safer travel, and connected communities in the past, but we're not seeing them in our neighborhoods.

Oregon needs a seismically resilient I-5 bridge. We also need to ensure the largest infrastructure investment in Oregon's history does not repeat the mistakes of the past. To this end, we offer our comments on the Interstate Bridge Replacement DSEIS. These will be submitted in multiple parts, organized by topic, and in full as an attachment to the first submission.

Public and Active Transportation

The inclusion of robust public and active transportation infrastructure will be critical to ensure that this project does not leave communities on both sides of the river behind. As our partners in the Just Crossing Alliance have put it, the DSEIS indicates that this project's "[mobility] 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". Public and active transportation are some of the best tools we have to begin to correct that imbalance. Equity priority communities, including the low-income Oregonians of color that Verde serves,

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Equity in Tolling Policy

We are deeply concerned that the proposed tolling policies provide no assurance that equitable pricing for low-income individuals will be in place when tolling goes into effect. Any tolling system must include discounts or other pricing policies that provide relief for low-income travelers as a baseline, not an afterthought. These policies must take effect when tolling begins, not after construction is completed. Exempting pre-construction tolling from these equity considerations would disproportionately burden communities that can least afford to pay. These policies should be guaranteed to be in place from the outset.

Traffic Modeling and the Marshall Report

The findings of the Marshall Report on traffic modeling, which raises important questions about the accuracy of traffic forecasts and the assumptions driving this project, deserve a thorough review and response as part of this process. The report highlights faulty modeling in the DSEIS that overestimates traffic growth and underestimates alternative transportation options. We found it particularly concerning that the original DSEIS analysis does not account for the effects of induced demand. We believe it is essential that these concerns are fully addressed, particularly before committing to the construction of a second auxiliary lane. We urge the Program and its local and federal partners to carefully review and respond to these findings, as they may have significant implications for the proposed level of capacity and the GHG and air quality analyses "downstream" of the traffic modeling.

Displacement of Homes and Businesses

We are alarmed by the potential displacement of up to 76 homes and 33 businesses within the project footprint. The displacement of residents, particularly in historically marginalized communities, could exacerbate existing inequities and disrupt lives. The project must include clear plans for minimizing displacement, providing adequate compensation, and offering relocation assistance where necessary. Special care should be taken to protect communities that have already been burdened by past infrastructure projects.

Absence of Health Analysis

The delay of the Health Analysis that we've anticipated during this comment period has left us unable to review or respond to some of the project impacts of greatest concern to the communities Verde serves, including air and noise pollution. This analysis is essential to understanding the environmental justice implications of the project and how it contributes to cumulative public health impacts for populations living in proximity to the project area. Without

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this information, we are unable to fully assess the health risks and make informed comments. We ask that the Health Analysis be made available as soon as possible and that time is allowed for additional public comment once it is available.

In conclusion, while we believe a seismically sound, multimodal bridge replacement is needed, the Interstate Bridge Replacement project must proceed in a way that also prioritizes equity, protects vulnerable communities, and provides a comprehensive, transparent analysis of the project's impacts. We hope that these concerns are weighed seriously as the planning process moves forward.

Thank you for your consideration.

Sincerely,

Indi Namkoong
Transportation Justice Coordinator, Verde
[redacted]

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Thank you for your consideration.

Sincerely,

Indi Namkoong
Transportation Justice Coordinator, Verde
(503) 442-8130
indinamkoong@verdenw.org

IBR Draft SEIS - RECORD #3725 DETAIL

First Name :	Taylor
Last Name :	Villucci
Attachments :	DSEIS-3725_Villucci_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #3725 DETAIL

Submission Date : 11/18/2024
First Name : Taylor
Last Name : Villucci
Business/Organization/Agency :

Submission Input :

First Name:
Taylor

Last Name:
Villucci

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Climate Change

Comment:
I moved to the Portland Metro area because I believed in the Metro's six desired outcomes, one being " The region is a leader on climate change, on minimizing contributions to global warming."

This expansion will not make us a leader on climate change, in fact it will be playing into the mistakes of our past and repeating them.

I'm not even thirty years old, yet it seems everywhere I look, government and corporate entities are acting like we are living in a world without climate change. Please, I beg you, for myself and my future children, for my neighbors, for our world… do not continue this. It is a misstep and it will not solve any problems— only create

new ones.

JCA comment #: 1042

IBR Draft SEIS - RECORD #3727 DETAIL

First Name :	ALLAN
Last Name :	RUDWICK
Attachments :	DSEIS-3727_Rudwick_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #3727 DETAIL

Submission Date : 11/18/2024
First Name : ALLAN
Last Name : RUDWICK
Business/Organization/Agency :

Submission Input :

First Name:
ALLAN

Last Name:
RUDWICK

Business or Organization:
Strong towns pdx

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
I heard that you guys are spending $5 million to destroy over $500,000 per year in tax revenue. With deals like

this we're going to go broke in no time. This is on top of spending way too much money on this project. We shouldn't be putting all of our financial eggs in one basket, and we shouldn't be widening freeways. The return on investment is negative on these kind of projects and you know it. The data has been out there for years. Please stop this thing and go back to the drawing board.

JCA comment #: 1041

IBR Draft SEIS - RECORD #3729 DETAIL

First Name :	Andrew
Last Name :	Butz
Attachments :	DSEIS-3729_Butz_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #3729 DETAIL

Submission Date : 11/18/2024
First Name : Andrew
Last Name : Butz
Business/Organization/Agency :

Submission Input :

First Name:
Andrew

Last Name:
Butz

Business or Organization:
Andrew

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
RE: IBR /Interstate Bridge Replacement
It is essential that the proposed IBR (Interstate 5, Portland-Vancouver crossing), at perhaps the most significant confluence of commercial, cultural, & ecological resources in the region, proceed promptly and with broad public input. I have been an area commuter & resident for more than 50 years, and I ask that the project...
* Prioritize a streamlined crossing, focusing on bridge replacement, transit enhancements, and multi-modal

active transportation (such as pedestrian access) -- without extensive freeway expansion.

* Locate transit and a multi-use path next to each other, for safety & ease of access.

Thank you for considering my comment.

Sincerely,

Andrew Butz

[redacted]

JCA comment #: 1040

IBR Draft SEIS - RECORD #3731 DETAIL

First Name :	Clifford
Last Name :	Eiffler-Rodriguez
Attachments :	DSEIS-3731_EifflerRodriguez_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #3731 DETAIL

Submission Date : 11/18/2024
First Name : Clifford
Last Name : Eiffler-Rodriguez
Business/Organization/Agency :

Submission Input :

First Name:
Clifford

Last Name:
Eiffler-Rodriguez

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Cumulative Effects

Comment:
It's time to understand we're approaching a crossing in the wrong manner.

No new bridges.

Because of the impact during any construction, including salmon migration, seismic resiliency, and bloat it's

time to right size our future.

Build a tunnel for continued vehicular traffic. It spares Vancouver from a razing by transportation planners who rather destroy a city the think of economic options for accommodating a need for multimodal crossings.

As presented the bridge will mean more extreme dangers to vehicles with it's focus on addressing congestion with more lanes.

When has that worked?

Build a tunnel to constrain the need to thrust humanity's blight over Hayden Island and give us the opportunity to develop the land we save in further commercial, housing, and tourism attractions.

Route transit and pedestrian options over the existing bridge to extend the life and connection of the local community to the crossing between our two states.

No more freeway expansion, it literally is mortgaging our future.

Sensible and safe crossings, community focused development, planning for high capacity multi modal transportation are essential to lead our region into the next century.

JCA comment #: 1039

IBR Draft SEIS - RECORD #3734 DETAIL

First Name :	Indi
Last Name :	Namkoong
Attachments :	DSEIS-3734_Namkoong_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #3734 DETAIL

Submission Date : 11/18/2024
First Name : Indi
Last Name : Namkoong
Business/Organization/Agency :

Submission Input :

First Name:
Indi

Last Name:
Namkoong

Business or Organization:
Verde

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Environmental Justice

Comment:
The delay of the Health Analysis that we've anticipated during this comment period has left us unable to review

or respond to some of the project impacts of greatest concern to the communities Verde serves, including air and noise pollution. This analysis is essential to understanding the environmental justice implications of the project and how it contributes to cumulative public health impacts for populations living in proximity to the project area. Without this information, we are unable to fully assess the health risks and make informed comments. We ask that the Health Analysis be made available as soon as possible and that sufficient time is allowed for additional public comment once it is available.

JCA comment #: 1048

IBR Draft SEIS - RECORD #3735 DETAIL

First Name :	Indi
Last Name :	Namkoong
Attachments :	DSEIS-3735_Namkoong_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #3735 DETAIL

Submission Date : 11/18/2024
First Name : Indi
Last Name : Namkoong
Business/Organization/Agency :

Submission Input :

First Name:
Indi

Last Name:
Namkoong

Business or Organization:
Verde

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Acquisitions and Displacement

Comment:
We are alarmed by the potential displacement of up to 76 homes and 33 businesses within the project footprint.

The displacement of residents, particularly in historically marginalized communities, could exacerbate existing inequities and disrupt lives. The project must include clear plans for minimizing displacement, providing adequate compensation, and offering relocation assistance where necessary. Special care should be taken to protect communities that have already been burdened by past infrastructure projects.

JCA comment #: 1047

IBR Draft SEIS - RECORD #3737 DETAIL

First Name :	Indi
Last Name :	Namkoong
Attachments :	DSEIS-3737_Namkoong_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #3737 DETAIL

Submission Date : 11/18/2024
First Name : Indi
Last Name : Namkoong
Business/Organization/Agency :

Submission Input :

First Name:
Indi

Last Name:
Namkoong

Business or Organization:
Verde

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Induced Demand

Comment:
The findings of the Marshall Report on traffic modeling, which raises important questions about the accuracy of

traffic forecasts and the assumptions driving this project, deserve a thorough review and response as part of this process. The report highlights faulty modeling in the DSEIS that overestimates traffic growth and underestimates alternative transportation options. We found it particularly concerning that the original DSEIS analysis does not account for the effects of induced demand. We believe it is essential that these concerns are fully addressed, particularly before committing to the construction of a second auxiliary lane. We urge the Program and its local and federal partners to carefully review and respond to these findings, as they may have significant implications for the proposed level of capacity and the GHG and air quality analyses “downstream” of the traffic modeling.

JCA comment #: 1046

IBR Draft SEIS - RECORD #3739 DETAIL

First Name :	Indi
Last Name :	Namkoong
Attachments :	DSEIS-3739_Namkoong_Original.pdf (4 kb)

IBR Draft SEIS - RECORD #3739 DETAIL

Submission Date :	11/18/2024
First Name :	Indi
Last Name :	Namkoong
Business/Organization/Agency :	Verde

Submission Input :

First Name:
Indi

Last Name:
Namkoong

Business or Organization:
[redacted]

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Neighborhoods and Equity

Comment:
We are concerned that the proposed tolling policies do not assure that equitable pricing for low-income individuals will be in place when tolling goes into effect. Any tolling system must include discounts or other pricing policies that provide relief for low-income travelers as a baseline, not an afterthought. These policies must take effect when tolling begins, not after construction is completed. Exempting pre-construction tolling from these equity considerations would disproportionately burden communities that can least afford to pay. These policies should be guaranteed to be in place from the outset.

JCA comment #: 1045

IBR Draft SEIS - RECORD #3741 DETAIL

First Name :	Jordan
Last Name :	Lewis
Attachments :	DSEIS-3741_Lewis_Original.pdf (9 kb)

IBR Draft SEIS - RECORD #3741 DETAIL

Submission Date : 11/18/2024
First Name : Jordan
Last Name : Lewis
Business/Organization/Agency :

Submission Input :

First Name:
Jordan

Last Name:
Lewis

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Climate Change

Comment:
The repeated claim that a reduction in idling is the only way to reduce greenhouse gas emissions is grossly incorrect and climate malfeasance. Driving an actual modal shift away from single-occupancy vehicles, by providing time-competitive and convenient alternatives, and by pricing unnecessary SOV trips out of peak hours (with wealth transfers to make equity focus groups whole) is the actual way. The insistence on reducing idling ignores the reality that drivers continue to drive once they have left the project corridor, before/after which

they are very likely stuck in traffic anyways! If expanded capacity reduced traffic, we would see no traffic in the parts of Portland that have already seen lane expansions.

There is no planet B, and our planet is larger than the project area. A project that induces more SOV travel throughout the region is admitting defeat during the final decades of control over our warming future.

See Just Crossing Alliance's analysis with Traffic Engineer Norman Marshall, where he argues that free-flowing traffic throughput could be achieved with better demand management and an audit of the metered on-ramp system. As a regular i5 commuter, I have seen how the HOV lane is NOT respected! It is constantly used by single-occupancy vehicles throughout the day, especially in rush hour!!!

I want to echo The Street Trust's comments that robust demand management should be implemented BEFORE the project is started, as the additional capacity promised by the new project may be proven objectively unnecessary afterwards.

An $8 Billion megaproject cannot rely on the wholly unrelated decarbonization of the country's auto fleet to excuse its own carbon-positive infrastructure. This project cannot assume that EV adoption will meet these extraordinary projections (in fact, I am confident it will not; new car sales continuously slump and EV adoption in particular has been slow). This is doubly true with the recent election of Donald Trump as president with a trifecta in congress. We need to REDUCE vehicle-miles-traveled under the assumption that new cars continue to be massive gas-guzzlers. If we are proven wrong and EV adoption truly does rocket, then we will have saved thousands of lives in particulate emissions from tires+brake pads, and further climate change caused by the increased road infrastructure (which is an oil product mind you, EV fleet or not.) A project of this size, with so many stakeholders on the local, state and federal level, has to hold itself to a higher standard. We don't have time for performative, marginal steps in the right direction. We need bold, transformative change. Don't let us down.

JCA comment #: 1044

IBR Draft SEIS - RECORD #3744 DETAIL

First Name :	Alexander
Last Name :	MENZIES
Attachments :	DSEIS-3744_Menzies_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #3744 DETAIL

Submission Date : 11/18/2024
First Name : Alexander
Last Name : MENZIES
Business/Organization/Agency :

Submission Input :

First Name:
Alexander

Last Name:
MENZIES

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
At a time when our climate future is in peril, and we must do everything we can to reduce our emissions before doing permanent harm to our world, we should not be committing to a future of increased car dependency while neglecting better multi modal and transit options. I do not own a car and I primarily travel by bike and transit. At the very least, the pedestrian and bike path should be adjacent to the Max rail to allow people to get on and off the train and to create a buffer between the path and car traffic. In addition, the multi use path should extent

farther into Vancouver to avoid such a steep incline.

My sincere hope is that the bridge could be replaced without so much highway expansion, saving funding that could be used to reach our climate goals while future-proofing our transit system, e.g. by widening the transit way to support upgrades to heavier rail, to include dedicated bus rapid transit, or to build a tunnel under downtown Portland to increase Max capacity – options that will carry people across the river more safely than cars, with much less impact to the environment and climate, and much less time and money wasted to traffic.

Beyond the environmental implications of the current plans, we should take note of the many cities that are tearing down old highways that once defaced and tarnished the natural beauty of their waterfronts, and we should not now repeat the mistakes of the past. The current IBR plan will cast a shadow over Vancouver's increasingly bustling waterfront and create a eye and ear sore. We aught to build a smaller bridge or tunnel, avoiding induced demand, displacing fewer homes and subjecting fewer people to vehicle pollution.

JCA comment #: 1053

IBR Draft SEIS - RECORD #3745 DETAIL

First Name :	Stone
Last Name :	Doggett
Attachments :	DSEIS-3745_Doggett_Original.pdf (4 kb)

IBR Draft SEIS - RECORD #3745 DETAIL

Submission Date : 11/18/2024
First Name : Stone
Last Name : Doggett
Business/Organization/Agency :

Submission Input :

First Name:
Stone

Last Name:
Doggett

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Induced Demand

Comment:
The traffic projections for the current IBR plan have been shown to be inaccurate. The tremendous expense and negative impact of a massively overbuilt highway will harm Oregon and Washington residents for generations. Every effort should be made to build the minimum required infrastructure that is justified is by a rigorous assessment of the regions needs. Failure to align the project with the best data is a failure of ODOT, WSDOT, Metro, and the Oregon and Washington legislature. In particular, the sitting members of the transportation committees and the governors. This massive allocation of state resources and harm to the region should not be taken lightly.

JCA comment #: 1052

IBR Draft SEIS - RECORD #3747 DETAIL

First Name :	Kevan
Last Name :	DuPont
Attachments :	D1_3747_DuPont_20241118_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #3747 DETAIL

Submission Date :	11/18/2024
First Name :	Kevan
Last Name :	DuPont
Business/Organization/Agency :	

Submission Input :

First Name:
Kevan

Last Name:
DuPont

Email:
kevandupont@gmail.com

City:
Portland

US States:
OR

Zip:
97211

Topic Area:
Induced Demand

Comment:
Expanding the highway by adding lanes will not reduce traffic. It will only increase pollution and noise. We should be focused on supporting alternative modes of transportation. The public transit and active transportation lanes on the bridge should be next to each other to maximize their convenience and safety.

JCA comment #: 1051

IBR Draft SEIS - RECORD #3749 DETAIL

First Name :	Andrew
Last Name :	Schamber
Attachments :	D1_3749_Schamber_20241118_Original.pdf (9 kb)

IBR Draft SEIS - RECORD #3749 DETAIL

Submission Date : 11/18/2024
First Name : Andrew
Last Name : Schamber
Business/Organization/Agency :

Submission Input :

First Name:
Andrew

Last Name:
Schamber

Email:
aschambe4@gmail.com

Phone:
13174502565

City:
Portland

US States:
OR

Zip:
97217

Topic Area:
Navigation

Comment:
The main credo of adopting an active transportation mentality is allowing folks that decide (or have no choice) to commute utilizing non-vehicular methods of transport. By having the multi-use path completely separate from the LRT line (separated by lanes of traffic mind you), again, alienates folks that would otherwise rely on these modes to get to and from either work or social gatherings. By adding barriers like this it will ultimately deter folks from utilizing this new infrastructure. Many users of one are users of the other. Consider adding

connection points to allow easy access for both thus reducing physical barriers.

JCA comment #: 1050

IBR Draft SEIS - RECORD #3751 DETAIL

First Name :	Joshua
Last Name :	Landry
Attachments :	D1_3751_Landry_20241118_Original.pdf (11 kb) PXL_20240110_231643192.MP_.jpg (6 mb)

IBR Draft SEIS - RECORD #3751 DETAIL

Submission Date : 11/18/2024
First Name : Joshua
Last Name : Landry
Business/Organization/Agency :

Submission Input :

First Name:
Joshua

Last Name:
Landry

Business or Organization:
Bristol Marine Services

Email:
mifune44@gmail.com

Phone:
19712125680

City:
portland

US States:
OR

Zip:
97217

Topic Area:
Acquisitions and Displacement

Comment:
The Shape of Things to Come

I bought my dream house on Friday January 5th. I was able to scrimp and save enough to pay cash for my house. I don't have a lot of money, in fact, I qualify as low income. However, I was able to manage what little I had, and with a little sacrifice (avocado toast) managed to pull it off. It was one of the more stressful things I've ever done but I miraculously made it happen. I also did it without any money from my parents or family or any sort of inheritance. I had earned every penny. I'm the first person in my family to own a house, to actually OWN a house. I am beholden to no bank. Perhaps we shouldn't call it a house, really I bought a view with the added benefit of a house attached to it. It's the kind of boot strap/american dream politicians drool and dream over but rarely see in reality.

Three days later, that classic American dream turned into a nightmare.

My honeymoon period came to an abrupt halt when, seemingly overnight, a colossal barge showed up, completely obscuring anything other than its ugly rusty steel topsides. Making contact with my house was a Tug boat from Mark Marine based in Camas, Washington belching its toxins into my house, setting off the carbon monoxide alarms. I was absolutely mortified and immediately rushed to our moorage office to hopefully receive some clarity if not answers. They had received no notice. It took weeks of them making phone calls to get to the bottom of it. Meanwhile, my new house remained completely untenable.I was losing my mind. I bought a gun. I hate guns. I couldn't afford an attorney, I had put every single dime into the purchase of my house and suddenly I was presented with this terrible reality.

I finally got to the bottom of it. I was on my way to the island when I saw their tender motoring to the dock at jantzen bay. I managed to kindly ask them what they were doing.

They were geologists under the employ of the IBR.

Later that day, the moorage office arrived at the same conclusion having been on the phone for days trying to get to the bottom of it. Every phone call was met with hostility and the ole nuremberg defense. Already, for a project barely off the ground, accountability was hardly a consideration. One would think in a situation which isn't covered by your typical social protocols, that common sense and the golden rule would easily prevail. In January, we'll get cold dry spells, typically from the east which is a departure from the prevailing wet sou'westerlies. And every once in a great while that cold front will bring ice and snow. If you use your tugboats diesel engines as your powerplant, and you know your river, it might be to your better judgment not to point it into someone's home to your leeward. You could very easily kill someone. Finally those easterlies did bring ice and snow and because I wasn't there, because I could not actually live in my house, that ice storm created ice dams, flooding the bedroom, destroying the floor. I spent months and thousands of dollars fixing it.

They were there for 20 days.

I was unfortunately under such incredible duress during those hellish 20 days I couldn't defend myself against what is clearly a litany of offenses, rights violations, and illegal acts. I did not know my rights at the time, but I sure as hell do now.

So, for all the IBR's talk of community involvement, this is the reality. A callous indifference to the communities it purports to benefit. Be warned my neighbors, because next time it might be you.

Attachment (maximum one):
PXL_20240110_231643192.MP_.jpg

JCA comment #: 1049

IBR Draft SEIS - RECORD #3754 DETAIL

First Name :	Kasandra
Last Name :	Griffin
Attachments :	D1_3754_Griffin_20241118_Original.pdf (10 kb)

IBR Draft SEIS - RECORD #3754 DETAIL

Submission Date : 11/18/2024
First Name : Kasandra
Last Name : Griffin
Business/Organization/Agency :

Submission Input :

First Name:
Kasandra

Last Name:
Griffin

Email:
kasandra.griffin@gmail.com

Phone:
15032381799

City:
Portland

US States:
OR

Zip:
97214

Topic Area:
Induced Demand

Comment:
I have lived in Portland, Oregon for 30 years. I am a multi-modal transportation user - I walk, ride bicycles, ride transit, and drive a car. I am also the parent of two small children and so I think about how transportation choices affect both people traveling with small children, and also how our current transportation choices affect our/their future. Vehicle emissions from transportation are one of the biggest causes of carbon emissions, and everyone who studies traffic knows that a bigger bridge will increase travel and therefore increase carbon

emissions.

I have traveled across the Interstate Bridge by bike and car numerous times, for work and pleasure trips to both Vancouver and points further north, so I am very familiar with the current bridge and access routes.

In designing a replacement facility, I believe that the priority issues should be equity, the environment and public health, and I do not see those items prioritized in this plan.
* Please prioritize accessibility and seamless integration of the active transportation and transit facilities. The multi-use path should be easy to access from all directions for all non-motorized users. As someone who recently walked across a bridge with a four-year-old, I can say with certainty that long ramps have an immediate negative impact on what pedestrian travel is possible. If the elevation makes a long approach ramp necessary for the sake if maintaining a tolerable grade, elevators are also necessary.
* People walking and rolling should have easy access to transit modes.
* People walking and rolling should be safe and protected from traffic at all points in their journey.
* The new bridge must integrate with existing and planned infrastructure for walking and rolling.

Thank you for the consideration.

JCA comment #: 1058

IBR Draft SEIS - RECORD #3755 DETAIL

First Name :	Tuyet-Hoa
Last Name :	Le
Attachments :	D1_3755_Le_20241118_Original.pdf (10 kb)

IBR Draft SEIS - RECORD #3755 DETAIL

Submission Date : 11/18/2024
First Name : Tuyet-Hoa
Last Name : Le
Business/Organization/Agency :

Submission Input :

First Name:
Tuyet-Hoa

Last Name:
Le

Email:
tuyethoa.le@icloud.com

Phone:
9712809076

City:
Hillsboro

US States:
OR

Zip:
97123

Topic Area:
Transportation

Comment:
The current design of the bridge, especially that of the single-level alternatives, seems to prioritize autos over active transportation, and creates unnecessary burden to marginalized communities.

I have biked and walked on similar freeway bridges with a parallel multi-use path and they are in no way a pleasant experience, aside from the view. The noise is always unbearable and during the summer months

there is also the issue of direct sunlight and heat. Therefore, to ensure that those crossing the bridge on foot or on saddle are well served, there needs to be some sort of noise (and debris) shielding from the roadway, and shading to prevent non-vehicular bridge users from facing heat exhaustion in the summer. Otherwise, those that might cross the bridge via active transportation could instead be inclined to drive across the bridge and thus increase VMT. For the single level alternatives, one suggestion to create a buffer for cyclists and pedestrians from road noise is to locate transit lanes between the multi-use path and the roadway. This also allows people riding popular bus routes like the C-TRAN 105 and 190 to traverse the river crossing more quickly. Adding the optional 2nd auxiliary lane on each side of the highway would go against this priority by attracting more vehicle traffic and thus creating more noise.

There should also be better direct access for users of the multi-use trail to their destinations. The path's abrupt transition at the north end of the bridge down to ground level via a 100-ft spiral creates out-of-direction travel for many, which could actually be negated by extending the path paralleling the LRT tracks all the way to Evergreen. The multi-use trail also abruptly ends at Marine Dr at the south end, making it difficult for those on active transportation to travel further south. The trail should really extended at least to southern extents of the project, if not further across the Columbia Slough to North Portland. Conversely, vehicular traffic gets direct access from North Portland to downtown Portland, without any out of direction travel.

Finally, many marginally communities are affected by this project, directly and in-directly. Rising housing costs have made it so that many that are not well-off are forced to live far away and commute far distances. The proposed toll would create additional burden for these especially low-income commuters. As such, a low-income toll discount is necessary from day one of the tolls starting. Building more lanes than necessary (ie the optional 2nd auxiliary lane pair) induces vehicular traffic over the bridge and drives greater congestion and health impacts to the marginalized communities that often exist next to high traffic arterials down the line from the highway project, not to mention introducing additional chemical runoff to our delicate water systems.

JCA comment #: 1057

IBR Draft SEIS - RECORD #3757 DETAIL

First Name :	Tanner
Last Name :	Wardrip
Attachments :	D1_3757_Wardrip_20241118_Original.pdf (9 kb)

IBR Draft SEIS - RECORD #3757 DETAIL

Submission Date : 11/18/2024
First Name : Tanner
Last Name : Wardrip
Business/Organization/Agency :

Submission Input :

First Name:
Tanner

Last Name:
Wardrip

Email:
tdwardrip@gmail.com

Phone:
5413215841

City:
Portland

US States:
OR

Zip:
97266

Topic Area:
Transportation

Comment:
I do not support the IBR project. I believe it’s a waste of tax dollars that will increase traffic, waste funds that could be used for transit, and remove homes displacing hundreds of people. With climate change getting worse, projects like the IBR will increase emissions and increase costs to the environment and those near by.

An tunnel/light rail would be a better investment over the IBR bridge.

JCA comment #: 1056

IBR Draft SEIS - RECORD #3759 DETAIL

First Name :	Andrew
Last Name :	Schamber
Attachments :	D1_3759_20241118_Original.pdf (9 kb)

IBR Draft SEIS - RECORD #3759 DETAIL

Submission Date : 11/18/2024
First Name : Andrew
Last Name : Schamber
Business/Organization/Agency :

Submission Input :

First Name:
Andrew

Last Name:
Schamber

Email:
aschambe4@gmail.com

Phone:
13174502565

City:
Portland

US States:
OR

Zip:
97217

Topic Area:
Induced Demand

Comment:
Multi-use path size is too small for modern day use. With the addition of e-bikes, e-scooters, and cargo bikes, a 14-foot path is very narrow to share with multiple speeds of transportation. In it's current design, there's no reason a wider multi-use path can not be considered. Or combined with the LRT route to eliminate additional constructed structures. By combining these routes it will allow easier access and eliminate confusion for folks that are utilizing both methods of transportation.

JCA comment #: 1055

IBR Draft SEIS - RECORD #3761 DETAIL

First Name :	Gary
Last Name :	Clark
Attachments :	D1_3761_Clark_20241118_Original.pdf (10 kb) Immersed-Tunnel-Concept.jpg (1 mb)

IBR Draft SEIS - RECORD #3761 DETAIL

Submission Date :	11/18/2024
First Name :	Gary
Last Name :	Clark
Business/Organization/Agency :	Hayden Island Community Safety Initiative

Submission Input :

First Name:
Gary

Last Name:
Clark

Business or Organization:
Hayden Island Community Safety Initiative

Email:
garyc@haydenisland-csi.org

Phone:
5037039749

City:
Portland

US States:
OR

Zip:
97217

Topic Area:
Transportation

Comment:
Our organization is wondering why the IBRP did not fully consider the "Immersed Tunnel" option (see

attached), when it was first presented it. The Immersed Tunnel option was selected British Columbia, Canada for a river crossing very similar to our Columbia River crossing. Such an option would take less than 5 years to build at 1/3rd the cost of the bridge designs the IBRP is currently considering, and there would be no need for tolls. There would also be far less impact on the environment and to our Island, while providing far easier access to I-5 for island residents, businesses, & visitors.

We know that the Hayden Island Neighborhood Network (HI-NooN) asked the same question of the IRBP when it first learned that those at the IRBP that evaluated the tunnel option appeared to have ties to a bridge building company. If true, then that would be reason enough for the IRBP to reconsider the Immersed Tunnel option by setting up an independent engineering commission that would be tasked to reexamine that option. On behalf of our organization, I strongly urge you to do just that, so as to avoid potential claims of impropriety by the IBRP in making its original decision to discount the Immersed Tunnel option. It would also be wise to have community representatives included on that commission.

.

Attachment (maximum one):
Immersed-Tunnel-Concept.jpg

JCA comment #: 1054

IBR Draft SEIS - RECORD #3764 DETAIL

First Name :	Theodore
Last Name :	Buehler
Attachments :	D1_3764_Buehler_20241118_Original.pdf (11 kb)

IBR Draft SEIS - RECORD #3764 DETAIL

Submission Date : 11/18/2024
First Name : Theodore
Last Name : Buehler
Business/Organization/Agency :

Submission Input :

First Name:
Theodore

Last Name:
Buehler

Email:
ted101@gmail.com

Phone:
503-890-0510

City:
Portland

US States:
OR

Zip:
97212

Topic Area:
Transportation

Comment:
Hi IBR Staff,

I attended the CRC Bike/Ped committee meetings in 2008 - 2010. I made a presentation to the group about my concerns about the bridge multiuse path connection in Vancouver. The CRC's connection, like the IBR's connection, loops down to water level.

A good connection should offer two options for arriving in Vancouver -- a loop (with elevator option) down to the waterfront, and also a river bridge-level route to Anderson St at Fort Vancouver (or anywhere near Evergreen Boulevard, in the 100' elevation above sea level area of Vancouver). The ideal spot would be the Anderson St., the frontage road along I-5 at the historic hospital building that is easily seen from I-5. Just south of the Evergreen Blvd overpass.

The lack of a direct level connection from Fort Vancouver or Midtown Vancouver to the main river bridge is a serious oversight.

People make their commute mode choice for various reasons, but the travel time and (for bicycles) travel energy are very important! You are adding, per my 2009 calculations, about 5 minutes travel time between residential areas of Vancouver and anywhere in Portland by the vertical and horizonal detours required to go from Uptown into Downtown, stop at traffic lights and stop signs, then climb the loop ramp back up to your original elevation.

This puts people riding bicycles at a geographic and topographic disadvantage relative to people driving cars.

Your design should not penalize people with a less direct, more energy intensive route by choosing to bicycle.

I no longer have my diagrams and calculations, but they are part of the public record for the CRC Bicycle and Pedestrian Committee, 2009. Which I assume you have reviewed for your current bridge project.

The findings were that by delaying bicycle traffic by 5 or 10 minutes through the circuitous route between residential areas of Vancouver and the main span of the bridge (compared to, say, getting on the freeway at Mill Plain Blvd and heading south) the travel time from much of inner Vancouver was longer by bicycle than by car when going to downtown Portland at peak morning commute hours. By contrast, with an efficiently designed bike route that launched horizontally out from Anderson St. the travel time for the average bicyclist would be *faster* than driving.

One major change has happened since 2009 in the bicycling world -- the advent of the E-assist bicycle as a commuting vehicle. Having a direct route from Evergreen Blvd onto the main Columbia River Bridge Span would enable many people in Vancouver to commute faster by bicycle than by car. And this is something we should encourage!

If, by chance, you have *not* reviewed the CRC Bike/Ped Committee's minutes and findings, I would like to request that you review them and add them into the current decisionmaking process.

Back in the Aughts there was a lot of public input on this. The CRC Staff had about a dozen serious professionals volunteer a lot of personal time to developing protocols for the bridge, etc. In particular there is one very nice document produced by this group called "World Class Bridge Design Parameters" where they looked at many large, successful bicycle and pedestrian components to bridges around the world, and identified what made facilities "world class". They measured distance across, widths, bike and pedestrian traffic, and possibly noise and air pollution.

I would encourage you to ensure that whatever facilities you have in your final design for the IBR meet the 2009 committee's qualifications for a "World Class Facility".

Thank you,
Ted Buehler

JCA comment #: 1062

IBR Draft SEIS - RECORD #3767 DETAIL

First Name :	L
Last Name :	Dong
Attachments :	DS1_3767_Dong_20241118_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #3767 DETAIL

Submission Date : 11/18/2024
First Name : L
Last Name : Dong
Business/Organization/Agency :

Submission Input :

First Name:
L

Last Name:
Dong

Email:
ledong91@gmail.com

US States:
WA

Zip:
98072

Topic Area:
Transportation

Comment:
I am strongly opposed to lane expansion in the Interstate Bridge Replacement project.
It has been shown that highway expansion does not solve congestion and contributes to pollution. More lanes result in induced demand which invites more vehicles on the road. More drivers mean increased greenhouse gas emissions and noise pollution.
Given increased travel demand and limited space, we should instead focus on maximizing throughput. We should invest in making public transit and active transportation more attractive options than driving low-occupancy vehicles.

JCA comment #: 1060

IBR Draft SEIS - RECORD #3769 DETAIL

First Name :	Debrorah
Last Name :	Smith
Attachments :	D1_3769_Smith_20241119_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #3769 DETAIL

Submission Date : 11/19/2024
First Name : Debrorah
Last Name : Smith
Business/Organization/Agency :

Submission Input :

Darn. I now see typos in what I sent! I meant to say that mass transit IS NOT viable here for most citizens! Oh well!
Debbie Smith

> On Nov 18, 2024, at 8:53?PM, Draft SEIS <draftseis@interstatebridge.org> wrote:
>
> ?Thank you for sharing your comments on the Interstate Bridge Replacement (IBR) Program Draft Supplemental Environmental Impact Statement (SEIS).?The public comment period is taking place from September 20th through November 18th.
>
> Sincerely,
> IBR Team
>
> -----Original Message-----
> From: deb67245@gmail.com <deb67245@gmail.com>
> Sent: Monday, November 18, 2024 7:54 PM
> To: Draft SEIS <draftseis@interstatebridge.org>
> Subject: Draft SEIS public comment
>
> [You don't often get email from deb67245@gmail.com. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]
>
> Do not shove this down our throats! The public needs input. Do the homework with actual costs and impacts on commuters, surrounding neighborhoods, with a realist ending date to collect the funds needed. Plan for the future!
> This isn’t New York City. Mass transit is viable here! We need our cars and to be able to afford to get to work!
Deborah H. Smith

IBR Draft SEIS - RECORD #3772 DETAIL

First Name :	Margaret
Last Name :	Tweet
Attachments :	3772_Original.pdf (12 kb)

IBR Draft SEIS - RECORD #3772 DETAIL

Submission Date :	11/18/2024
First Name :	Margaret
Last Name :	Tweet
Business/Organization/Agency :	
Attachments :	3772_Original.pdf (7 kb)

Submission Input :

IBR program shared that there were 370 active transportation trips a day over the bridge versus 184,400 with all other modes in a graph dated Nov 23, 2021.

The DSEIS states “an estimated 410 bicyclists and pedestrians, on average, make trips across the bridge daily.”

Where is the data to support this? Is it based on video of Bridge activity? Why the increase in estimate? I have never seen that kind of foot and bicycle traffic, on average. So many rainy,strong windy days over the Columbia River deter bicyclists and pedestrians.

As described in Chapter 2, there are three site options for a new park and ride facility near the proposed Waterfront Station. Two of these sites (Sites 2 and 3) would require the acquisition of additional property beyond that needed for the highway and transit facilities. Site 2 would require full acquisition of one commercial parcel and no displacements. Site 3 would require full acquisition of four commercial parcels and displacement of one business. Site 1 would not require any acquisitions or displacements. Property impacts associated with the Waterfront Station park-and-ride options are shown in Table 3.3-4 and are in addition to the impacts identified in Table 3.3-3.

My comment: With the height of the Waterfront Station~ 80-90 ft in the air, seems unlikely residents will use it, so a Park and Ride is likely not needed. Going up and down a long spiral staircase can be done by a limited group of people willing to risk meeting a hostile stranger. Is there an elevator? physically possible, still risky. Parents and caregivers with children unlikely to take the risk. Older residents familiar with the news reports of assaults on and near MAX stations seem unlikely to use light rail, even at ground level.

At a recent RTC meeting in Vancouver, an IBR presentation was made, and it was suggested that public comments about crime on and around MAX Lightrail stations and trains would not be considered by IBR. Why limit public input ? This is a primary reason that many women, children, teens, older residents, physically challenged residents do not consider lightrail a safe transit option.
Following is not a complete list of public safety issues on and around TriMet MAX Lightrail stations and trains.

MAX station shooting victim identified as 43-year-old Portland man

https://www.kptv.com/2022/07/06/max-station-shooting-victim-identified-43-year-old-portland-man/

Published: Jul. 6, 2022

Police say 43-year-old Lucian Thibodeaux, of Portland, was shot at a TriMet station in the 16100 block of East Burnside Street around 5 a.m.

Thibodeaux was taken to a local hospital but died from the same day.

Victim killed in shooting near MAX platform identified, injured victim released from hospital

Published: Jul. 9, 2022

https://www.kptv.com/2022/07/09/victim-killed-shooting-near-max-platform-identified-injured-victim-released-hospital/

Just before 11:30 p.m. Wednesday, East Precinct officers responded to a shooting near the MAX platform at East Burnside Street and Northeast 148th Avenue. Officers arrived and found Mendoza-Hernandez dead.

Woman attacked, robbed at Parkrose Transit Station:

https://www.kptv.com/2018/03/30/woman-attacked-robbed-parkrose-transit-station-he-says-hes-going-kill-me/

Portland police said officers responded to the Parkrose Transit Station on Monday at 2:37 p.m. after it was reported a woman was attacked and robbed.

The woman was punched and kicked several times by the suspect and she was knocked to the ground, according to police.

father says 2-year-old daughter was poked by needle on MAX train

Updated: Jan. 10, 2018 at 11:20 AM PST

https://www.kptv.com/2018/01/10/gresham-father-says-2-year-old-daughter-was-poked-by-needle-max-train/

TriMet officials say they see this problem on their trains and buses too, and it’s not uncommon to find hypodermic needles when they clean their vehicles every night.

They encourage everyone to check before taking a seat, and urge that if anyone see’s something, tell a TriMet employee right away.

MAX train rapist sentenced to prison for 2021 assault

(KPTV) – A man accused of sexually assaulting a woman at a Beaverton MAX stop pleaded guilty to all charges Monday, according to the Washington County District Attorney's Office.

The charges stem from an incident in June 2021. According to the D.A.'s Office, a 31-year-old woman was getting off the MAX train at the Beaverton Creek station just after midnight when William Wesley Gilchrist, 40, began following her. Gilchrist reportedly began attacking her from behind, and sexually assaulting her.

https://www.kptv.com/2022/12/06/max-train-rapist-sentenced-prison-2021-assault/

MAX train passenger with knife arrested after becoming verbally aggressive

Published: Aug. 11, 2022

https://www.kptv.com/2022/08/11/max-train-passenger-with-knife-arrested-after-becoming-verbally-aggressive-police/

MAX deadly shooting likely self defense

https://www.kgw.com/article/news/max-deadly-shooting-likely-self-defense/283-71630580

Man shot during fight on MAX Green Line train in SE Portland

https://www.kgw.com/article/news/crime/one-person-shot-max-green-line/283-6e2d5b3c-4257-4072-893e-f9b662552760

Updated: 10:10 PM PST March 3, 2022

A man was shot https://www.kgw.com/crime during a fight on a MAX Green Line train in Southeast Portland Thursday evening.

Police investigate two incidents, 48 hours apart, of MAX trains hitting people

Published: May. 16, 2022

https://www.kptv.com/2022/05/16/police-investigate-two-incidents-48-hours-apart-max-trains-hitting-people/

MAX train hits pedestrian in Northeast Portland

The incident marked the second crash involving a MAX train and a pedestrian in Portland the past week. On May 13, a MAX train hit and killed a pedestrian around 10:30 p.m. near Northeast 160th and Burnside Street. PPB later identified the pedestrian as 43-year-old Phillip Allen. https://www.kgw.com/article/news/local/max-train-hits-pedestrian-northeast-portland/283-2ac06b7b-3f92-4020-9db5-db842a22d942 https://www.kgw.com/article/news/local/max-train-hits-pedestrian-northeast-portland/283-2ac06b7b-3f92-4020-9db5-db842a22d942

2 teens stabbed on MAX train; Updated: Sep. 3, 2023

(KPTV) - Two teenagers were stabbed and injured on a TriMet MAX train, and the suspect was arrested in southeast Portland Saturday evening, according to Portland police. https://www.kptv.com/2023/09/04/2-teens-stabbed-max-train-man-charged-with-hate-crime-is-wanted-by-florida-court-docs/ https://www.kptv.com/2023/09/04/2-teens-stabbed-max-train-man-charged-with-hate-crime-is-wanted-by-florida-court-docs/

Published: Apr. 1, 2024 at 1:40 PM PDT

PORTLAND Ore. (KPTV) - A 51-year-old man has been charged with second-degree murder in connection with an unprovoked deadly stabbing on a Portland MAX train on Friday, March 29, according to a probable cause affidavit from Portland Police. Shondel L. Larkin was charged with the attack, which took place on an eastbound MAX train Friday evening. He was arrested at the scene after police found him inside the train with a knife and what appeared to be blood on his clothes. https://www.kptv.com/2024/04/01/court-docs-suspect-killed-man-unprovoked-attack-max-train/

Woman found guilty of pushing toddler onto train tracks in Portland

(KPTV) - A mother and child were waiting for a MAX train when Workman shoved the child, who was three at the time, off of the platform and face-first onto the train tracks without warning or provocation. Full story https://www.kptv.com/2024/02/01/woman-found-guilty-after-pushing-toddler-onto-train-tracks/

Man smashes MAX train passenger in the face with rock Mar. 8, 2023

Newly released court documents reveal that a man smashed one passenger in the face with a rock on a MAX train… He was riding on the MAX when he noticed Moan yelling at a female passenger while holding a rock, according to the document. The woman appeared “terrified,” so the victim pulled out his phone and got up to assist her. Full story https://www.kptv.com/2023/03/08/man-smashes-max-passenger-face-with-rock-court-docs/

Man gets prison for threatening MAX train driver with knife, yelling Asian slurs

Jun. 21, 2024 (KPTV) - A man was sentenced to 15 months in prison this week for threatening a MAX train driver with a knife and using derogatory comments against the employee.https://www.kptv.com/2024/06/21/man-gets-prison-threatening-max-train-driver-with-knife-yelling-asian-slurs/

Family of man killed on MAX train files wrongful death lawsuit against TriMet

In the six-page wrongful death lawsuit, the family of Michael Brady claims TriMet officials knew about the ongoing violence on the trains and knew about it long before Brady was killed, but they didn’t do enough to prevent it. In March, 51-year-old Brady was stabbed to death on a MAX train while riding home from work to have dinner with his wife and children. Full story https://www.kptv.com/2024/10/23/family-man-killed-max-train-files-wrongful-death-lawsuit-against-trimet/

IBR Draft SEIS - RECORD #3774 DETAIL

First Name :	John
Last Name :	Williams
Attachments :	DS1_3774_Williams_20241118_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #3774 DETAIL

Submission Date :	11/18/2024
First Name :	John
Last Name :	Williams
Business/Organization/Agency :	

Submission Input :

First Name:
John

Last Name:
Williams

Email:
williamswestcoast@gmail.com

Topic Area:
Transportation

Comment:
For cars and trucks, the bridge project should be nothing more than a basic replacement. Do not add extra lanes or any other enhancements to increase vehicle capacity! This will only make traffic worse in other areas. Instead, use this project to make the bridge as easy to use for bikes as it is for cars. Build wide paths for bikes and pedestrians buffered from vehicles by light rail. Provide smooth and fast connections to paths and bike routes on both sides of the bridge without using disruptive spirals. Make sure there is a good connection to the Vancouver/Williams corridor! The biking experience should be comparable to that on the Tilikum bridge.

JCA comment #: 1066

IBR Draft SEIS - RECORD #3776 DETAIL

First Name :	Shannon
Last Name :	Robalino
Attachments :	D1_3776_Robalino_20241118_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #3776 DETAIL

Submission Date : 11/18/2024
First Name : Shannon
Last Name : Robalino
Business/Organization/Agency :

Submission Input :

First Name:
Shannon

Last Name:
Robalino

Email:
shannon.robalino@gmail.com

City:
Portland

US States:
OR

Zip:
97212

Topic Area:
Transportation

Comment:
If we are going to get serious about reducing emissions and tackling climate change, we need to look more closely at projects like the interstate bridge replacement. The current proposal is excessive and will only increase traffic.

JCA comment #: 1065

IBR Draft SEIS - RECORD #3778 DETAIL

First Name :	Max
Last Name :	Weisenbloom
Attachments :	DSEIS-3778_Weisenbloom_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #3778 DETAIL

Submission Date : 11/18/2024
First Name : Max
Last Name : Weisenbloom
Business/Organization/Agency :

Submission Input :

First Name:
Max

Last Name:
Weisenbloom

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
A bridge replacement such as the IBR comes along only once in a while, and this project must accommodate the future needs of Portland, Vancouver and the PNW - not just in the next 5 or 10 years, but for the next 50 or 100. The long term goals of the region involve much more investment in public transit and more efficient ways of travel, and this project has the opportunity to either embrace those goals or to squander them. It's much cheaper to build in the capacity for mass transit like larger busses and rail today then years down the road

when the Columbia river crossing is the expensive missing link in a connected PNW.

JCA comment #: 1064

IBR Draft SEIS - RECORD #3780 DETAIL

First Name :	Tanner
Last Name :	Wardrip
Attachments :	DSEIS-3780_Wardrip_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #3780 DETAIL

Submission Date : 11/18/2024
First Name : Tanner
Last Name : Wardrip
Business/Organization/Agency :

Submission Input :

First Name:
Tanner

Last Name:
Wardrip

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
Portland shouldn't be investing in the IBR. An immersed tunnel will be a better investment. A downtown tunnel for the max lines would be a better investment.

JCA comment #: 1063

IBR Draft SEIS - RECORD #3782 DETAIL

First Name :	Angela
Last Name :	Cochran
Attachments :	DSEIS-3782_Cochran_Original.pdf (4 kb)

IBR Draft SEIS - RECORD #3782 DETAIL

Submission Date : 11/19/2024
First Name : Angela
Last Name : Cochran
Business/Organization/Agency :

Submission Input :

Dear Draft SEIS committee,

There is a lot of information out there on the Interstate Bridge project, but it was difficult gathering the info I needed to properly comment as I've come into the process late. I spent over 5 hours yesterday looking through 8 or 9 videos that I could find online, and reading through the Draft SEIS, but I did not find one video that described the basics of each of the 5 options – nor a comparison between the options. So, I apologize if some of my comments are due to a lack of knowledge of the subject. Mainly I have a lot of questions. I will comment based on what I think I am seeing in the proposals, but mostly on what is important to me and I think should be the most important to people that live in Vancouver.

Bridge option

Three of the four options for a new bridge appear to be very tall - taller than the current bridge, and either wider or double-decker. I do not want a big bridge, tall bridge. I would like to keep the profile of the bridge as close to the current footprint - height and width – as possible so that we do not have to tear up the downtown area. All the new interchanges will be very expensive and that money would be better spent on an addition, separate structure - one that doesn't go right over the top or our downtown and waterfront area.

I have watched the birds-eye view animated videos of the bridge options. What I care most about, though, is not what the bridge looks like from above, it is what these massive, elevated freeway onramps will look like from down below from the river from the new waterfront, when I am walking near the park and WhoSongs or driving toward downtown along Columbia. I walk along the river at least once a week. I do not want freeways over my head. If you do that, you will be ruining this beautiful waterfront area that is so nice, and is the jewel of our city. Same thing for our newly improved downtown, which is now really something to be proud of. We don't need freeways overhead – like a ghetto, like the trashy areas near the raised freeway in Seattle and on the eastside of the Willamette along the Esplanade – where the homeless hang out.

After many years of waiting, and much construction, our community now has a beautiful waterfront. We have really improved our waterfront. I didn't see any images, but when I imagine these huge superstructures and especially the elevated onramps all over the place, I think my beautiful new city will be ruined. I do not want freeways over our heads when we are walking along the waterfront or downtown.

Raised entry ramp

I do not like the idea of raised ramps for other reasons. In the winter, the raised ramp to get from I-5 to SR-14 can be very hazardous when the temperatures get below pricing, because it's above ground and so close to the moisture from the river.

Also, one of the main reasons for building the new bridge is because it may not be safe in an earthquake. Are all these elevated entrance ramps seismically safe? I would worry more about them than the current bridge in an earthquake.

Bypass Option and 3rd Bridge

This is not 1957. Vancouver is not longer a tiny community and I-5 traffic is not what it was way back when we connected the freeway through the middle of our city. We should not build a superstructure that that goes overhead and is a canopy for our downtown and waterfront. We should design a bypass, like Bend and Redmond when they grew and the traffic going through their towns got to be too much. We need a third bridge. That discussion and its location should be part of this plan.

Bike and Pedestrian Access

I have questions about the various proposed plans and what their options are for Bike and Pedestrian access to get onto the bridge from the Vancouver downtown area. And also, how do bikes gets get onto and off of Hayden Island? My husband and I often ride our bikes in the downtown area and along the waterfront, and enjoy riding across the bridge, as you get a nice view of the river and we like to visit the restaurants and some of the shops at Jantzen beach. In my viewing of the animated aerial views the bike and pedestrian access on and off the bridge is unclear. From what I see three of the 4 bridge plans have the structure very elevated. The current bridge already has a very noticeable hill to climb when you're riding a bike. I would hate to see a hill that is a lot steeper. I also would not want to have to backtrack several miles north of the bridge from downtown, to get onto the bridge. With the new bridge, I want easy access to ride my bike or walk across the bridge from downtown to Hayden Island – like I can do now.

IBR Draft SEIS - RECORD #3785 DETAIL

First Name :	Kristopher
Last Name :	Fortin Grijalva
Attachments :	OEC_Original.pdf (194 kb)

Oregon Environmental Council

PO Box 14822
Portland, OR 97239
503.222.1963
OEConline.org | @OEConline

November 18, 2024

Interstate Bridge Replacement Program
Attention: Draft SEIS Public Comment
500 Broadway, Suite 200, Vancouver, WA 98660

Director Johnson and the IBR Project Team:

Thank you for the years of engagement with Oregon Environmental Council (OEC) and its partners around the wide variety of issues including active transportation, public transit, and the need to meet our greenhouse gas reduction goals. It is in this spirit of collaboration that we submit this comment letter for the DSEIS.

Oregon Environmental Council is a nonprofit, nonpartisan, membership-based, state-wide organization that advances innovative, collaborative and equitable solutions to Oregon's environmental challenges for today and future generations. Oregon Environmental Council has closely tracked the Interstate Bridge Replacement Program (IBRP) for years and we understand the potential long term impacts this project will have on transportation and land use patterns for the region for half a century to come. **With that in mind, we find the current IBRP, as proposed in the DSEIS, fails to meet the minimum standards for minimizing negative impacts, providing adequate alternatives, and effectively mitigating community harm.** The following include our main concerns

Priority Concern #1: User Access and Experience for People Walking, Biking, Rolling

It is critical that the new bridge meets or exceeds active transportation usership goals. For that to happen, the system must be designed to meet the needs of everyone, from eight to eighty years old, and regardless of their ability level. The current design does not meet this threshold, specifically: connectivity, level of stress/comfort, safety, and operations and maintenance.

- The elevation of the multi-use path crossing the Columbia River is of high concern. 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 challenge is especially made clear on the Vancouver access point. Under current design, active transportation users must descend (lose elevation) as they approach the waterfront, then

Oregon Environmental Council

PO Box 14822
Portland, OR 97239
503.222.1963
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use a ½ mile long, 4.5% grade circular facility to climb up to the bridge before crossing the Columbia River. We are calling this the "Vancouver Dip." This is a significant barrier and is ableist in design. The program needs to include a multi-use path at the bridge's grade from Evergreen (the Vancouver library) to the riverfront so that walkers/rollers/riders have direct access to the bridge. This is an extreme example of out of direction travel that is exacerbated by out of elevation travel.

- There is additional out of direction travel for people making trips that combine transit and walking/rolling/biking. Current design places active transportation and transit facilities on opposite sides of the bridge, meaning users using more than one mode have additional out of direction travel getting from one side to the other. These additional distances are especially challenging for people with mobility challenges. If you are a multimodal commuter (walks, bikes, rolls AND uses transit in the same trip or commute) then the IBR project team really needs to hear how this would affect you. Share your stories of multimodal trips and how locating the multi-use trail and transit on the same side of the bridge is critical. By ensuring accessibility features, we protect the rights and needs of a broad user base, including non-drivers, low-income residents, and individuals with disabilities. Additional benefits of placing active transportation and transit on the same side of the bridge include:
    a. Seamless Transition: Users should easily switch between transit and active transportation at any station, with no grade changes or distance barriers.
    b. 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.
    c. 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.
    d. Emergency Egress: The multi-use path should double as an emergency exit route for the transit way, supporting user safety during unexpected events.
    e. Inclusive Design Principles: These principles ensure the accessibility and usability of both transit and active transportation facilities for individuals of all abilities.
- Walking/Biking/Rolling Connectivity to the Main Bridge Multi-use Path from Oregon Mainland 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

Oregon Environmental Council

PO Box 14822
Portland, OR 97239
503.222.1963
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is key to creating safer, more attractive, and therefore more heavily used walking, rolling, and biking routes.

- Separating Vulnerable Road Users from Freight is Critical - A distinct separation of walk/bike/roll corridors from freight routes reduces conflicts between these two user groups. For example, the current design for the ramp from Vancouver Way to MLK North poses significant conflict with freight, as the proposed route travels down, across, and back up a freight-heavy on-ramp. Given the Marine Drive interchange is usually described as the most heavily used freight corridor in Oregon, we believe additional alternatives need to be studied that entirely separate walk/bike/roll travel around rather than through this important freight interchange.
- Connection to the Interstate Avenue/Expo Way Walk/Bike/Roll Corridor The Supplemental Environmental Impact Statement (SEIS) 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 walk/bike/roll corridors to ensure safety and connectivity.
- The Marine Drive Single Point Interchange The proposed design for the Marine Drive Single Point Interchange presents a potential conflict between bike lanes and freight traffic. We request that additional alternatives be studied, including options that completely remove bike lanes from this interchange and investment of saved funds into further enhancing other connections. These studies should also explore how the project can meet the requirements of the Oregon Bike Bill without relying on the shoulders of MLK and Marine Drive for bike travel. Our research suggests that the Oregon Bike Bill allows for more flexibility in design than the IBR project has acknowledged. We want to make sure that all allowable uses of the required 1% for bike/ped are studied with a focus on promoting vulnerable road user safety.
- The Vancouver/Williams Walk/Bike/Roll Corridor is a major north-south bike route in Portland, but its 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. Additional alternatives should be explored in the SEIS to improve this connection. One potential solution is to extend the proposed Union Court separated bike lane further, creating a parallel cycle track or entirely separate path alongside MLK. This path could be located at the toe of the MLK embankment, providing a safe, barrier-separated corridor for both northbound and southbound travel. This would eliminate the need for bike lanes on the

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shoulders of MLK, significantly separating pedestrian, bike, and roller traffic from freight movements.

These alternatives were previously proposed to the IBR project and have been studied by the City of Portland. We urge the SEIS to consider them further and to adopt separated facilities, especially in these most dangerous areas of heavy freight movement.

- 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 together. Having excellent connections with the 40-Mile Loop is important for ease of use and wayfinding. The IBR is improving an important segment of the 40 Mile Loop and we like that! IBR's addition to the 40 Mile Loop Trail connects to the west to the already built separated trail along west bound Marine Drive. This connection is well-designed, offering a safe and direct route for cyclists and pedestrians separated from other traffic. We fully support this.
- However, the proposed eastbound connection to the Bridgeton Trail portion of the 40-Mile Loop is not ideal. 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 not a convenient or efficient connection. We request that alternative designs 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.

Priority Concern #2: Safety, Comfort and Equitable Multimodal Access

The Interstate Bridge Replacement project must prioritize safety, accessibility, and comfort for all users, particularly those using active transportation modes. Our comments must emphasize the need to integrate active transportation and transit facilities closely, ensuring they serve as a cohesive and accessible network. Missteps in this design could lead to significant safety and accessibility issues, which NEPA requires us to address to protect the interests of all impacted populations. If a single-level bridge is chosen, the multi-use path should be positioned on the outer side, adjacent to the transit lanes. This placement would act as a buffer against noise, vibration, and vehicle debris from motor traffic, enhancing user comfort and safety.

- **Noise and Debris***:* With tens of thousands of high speed car and truck vehicles passing over the bridge daily, active transportation users need protection from road noise and vehicle debris. To meet active transportation user goals, we need a design that protects users from these roadway hazards. Without adequate noise and debris shielding, the

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bridge environment will be too uncomfortable and even hazardous. Such conditions could discourage walking, biking, and other modes, pushing people towards single-occupancy vehicle use, thereby increasing environmental impacts and reducing the project's alignment with climate resilience goals.

- **Temperature and Shading:** We know that ambient temperatures on/around the bridge will exceed 100°F in summer months. It is critical that active transportation users have natural and/or human-made shading to mitigate heat and weather impacts on users. Failure to do so could leave the bridge infrastructure unable to serve users effectively and, therefore, miss our active transportation user goals.
- **Unsheltered homelessness,** which is pervasive across Oregon, can be concentrated in the vicinity of covered projects. A safety and maintenance plan is essential to consider a compassionate, long-term approach that integrates both personal safety measures and supportive services for people experiencing homelessness. This way, the IBR can serve not just as an infrastructure project but also as a supportive space that balances public safety and social responsibility, while keeping our shared multi-use paths clear for use as transportation corridors.
- **Lighting and Isolation:** People will only use active transportation and transit if they feel safe. As such, lighting throughout the multi-use path project area is critical. Furthermore, placing active transportation and transit facilities together increases the number of people sharing the space and reduces the feelings of vulnerability and isolation, especially at night or during low-traffic periods.
- **Emergency Access:** We have concerns that medical and police vehicles cannot directly access the multi-use path. Additionally, lack of embedded rail ties prevents ambulances and emergency responders from directly getting to those using the transit system. Furthermore, if emergency responders are expected to access multi-use path and transit users by parking on highway shoulder and scaling a divider, we are concerned that this indicates there is not sufficient separation between automobiles traveling at highway speeds and active transportation modes (see “noise and debris” above).
- **Grade and Distance:** As mentioned previously, current designs require significant out of direction travel both in terms of distance and grade. It is worth noting that single occupancy vehicle travel experiences little to no out of direction travel while active transportation users in and out of Vancouver experience an additional one mile of out of direction travel each time they navigate the Vancouver Dip. This is an inequitable design.

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503.222.1963
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Priority Concern #3: Environmental and Climate Impacts
Transportation contributes ~40 percent of Oregon's greenhouse gas emissions and the majority of those emissions come from single-occupancy vehicles. One of the cornerstone strategies OEC sees in reducing greenhouse gas emissions is through the reduction of vehicle miles traveled. By building excellent active transportation and transit facilities–and tolling appropriately–this infrastructure project could give world-class options to travelers that are healthier, more affordable and good for our environment.

- **Global impacts:** Unfortunately, the proposed design does little to reduce auto travel, estimating a 62% increase in study-area miles we drive (aka vehicle miles traveled or 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 carbon reduction goals

- **Local impacts:** If this project fails to reduce VMT, local impacts include:
    - Additional air pollution (greenhouse gas and particulate matter) from internal combustion emissions generated by vehicles
    - Negative impacts to water quality from chemical, oil, tire particulate, and brake particulate runoff
    - Additional noise pollution to surrounding communities

Priority Concern #4: Fiscal Responsibility and Economic Benefits
Active and Public Transportation infrastructure can provide a very high return on investment if well designed.

- **Economies of Combined Systems:** By separating active transportation from light rail, the current project design expends dollars on separate access facilities to both systems. The most significant expenditure is on the spiral ramp connecting active transportation to the Vancouver waterfront and current design does not offer an elevator option to users of the multi-use path.
- **Demand Management:** Managing demand first, will help us shape a more efficient, right-sized, and thus cost-effective project for the future generations. Variable tolling is a powerful tool when equitably deployed.
- **Mode Equity:** Avoid subsidizing private auto travel at expense of walkers/rollers/cyclists
- **Long term funding plan for operations and maintenance (O&M) of active transportation facilities***:* Variable Pricing (aka tolling) generates a revenue stream which can be used to fund operations and maintenance for the active transportation facilities,

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Portland, OR 97239
503.222.1963
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including but not limited to clearing the right of way of debris, glass, trash, snow and ice, and generally keeping the routes/pathways on the bridge and approaches free of barriers.

- **Equity and tolling in the I-5 Corridor is not a matter of if, but when. For this reason, we insist that regardless which state manages the IBR toll program, that implementation is in accordance with ODOT Equity and Mobility Advisory Committee's Low Income Toll Program,** and so that the project enhances rather harms access and mobility for low-income and BIPOC communities.

The work to shape the future of Oregon and Washington through the Interstate Bridge Replacement Program is critical. At the root of this project, climate and equity benefits should be centered, and it must not perpetuate a status quo of steadily increasing driving and sprawl.

Our organization has a deep history in environmental policy advocacy. Oregon and Washington have both made big environmental policy steps over the decades, making bold decisions to break with the status quo when it no longer serves the present and threatens the health and stability of our communities in the future. In Oregon, we have a proud history of reimagining uses of federal transportation investments, for example with the Mt. Hood Freeway, choosing to invest in cutting edge light rail instead of expanding highways to the detriment of the region. Every one of those decisions was difficult, and it took courage and insight for the policy makers involved to imagine a different future. We are asking you to do that again with this project.

Thank you for your time and consideration.

Sincerely,

Kristopher Fortin Grijalva
Transportation Program Director

IBR Draft SEIS - RECORD #3789 DETAIL

First Name :	Debbie
Last Name :	Smith
Attachments :	DSEIS-3789_Smith_Original.pdf (6 kb)

IBR Draft SEIS - RECORD #3789 DETAIL

Submission Date : 11/19/2024
First Name : Debbie
Last Name : Smith
Business/Organization/Agency :

Submission Input :

Darn. I now see typos in what I sent! I meant to say that mass transit IS NOT viable here for most citizens! Oh well!
Debbie Smith

> On Nov 18, 2024, at 8:53?PM, Draft SEIS <draftseis@interstatebridge.org> wrote:
>
> ?Thank you for sharing your comments on the Interstate Bridge Replacement (IBR) Program Draft Supplemental Environmental Impact Statement (SEIS).?The public comment period is taking place from September 20th through November 18th.
>
> Sincerely,
> IBR Team
>
> -----Original Message-----
> From: deb67245@gmail.com <deb67245@gmail.com>
> Sent: Monday, November 18, 2024 7:54 PM
> To: Draft SEIS <draftseis@interstatebridge.org>
> Subject: Draft SEIS public comment
>
> [You don't often get email from deb67245@gmail.com. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]
>
> Do not shove this down our throats! The public needs input. Do the homework with actual costs and impacts on commuters, surrounding neighborhoods, with a realist ending date to collect the funds needed. Plan for the future!
> This isn’t New York City. Mass transit is viable here! We need our cars and to be able to afford to get to work!
Deborah H. Smith

IBR Draft SEIS - RECORD #3790 DETAIL

First Name :	Stephen
Last Name :	Bernal
Attachments :	DSEIS-3790_Bernal_Original.pdf (6 kb)

IBR Draft SEIS - RECORD #3790 DETAIL

Submission Date : 11/18/2024
First Name : Stephen
Last Name : Bernal
Business/Organization/Agency :

Submission Input :

First Name:
Stephen

Last Name:
Bernal

Email:
stephenbernal@tutanota.com

City:
Portland

US States:
OR

Zip:
97211

Topic Area:
Transportation

Comment:
As a resident who primarily bikes for commuting and recreation (yet also drives/owns a car), it is imperative that any revised interstate bridge crossing and accompanying projects prioritizes and encourages multimodal, low-carbon access and ease of use. Walking,, biking, and accessing public transit are key—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.

JCA comment #: 1059

IBR Draft SEIS - RECORD #3792 DETAIL

First Name :	Margaret
Last Name :	Tweet
Attachments :	DSEIS-3792_Unknown_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #3792 DETAIL

Submission Date : 11/19/2024
First Name : Unknown
Last Name : Unknown
Business/Organization/Agency :

Submission Input :

IBR program shared that there were 370 active transportation trips a day over the bridge versus 184,400 with all other modes in a graph dated Nov 23, 2021.

The DSEIS states “an estimated 410 bicyclists and pedestrians, on average, make trips across the bridge daily.”

Where is the data to support this? Is it based on video of Bridge activity? Why the increase in estimate? I have never seen that kind of foot and bicycle traffic, on average. So many rainy,strong windy days over the Columbia River deter bicyclists and pedestrians.

As described in Chapter 2, there are three site options for a new park and ride facility near the proposed Waterfront Station. Two of these sites (Sites 2 and 3) would require the acquisition of additional property beyond that needed for the highway and transit facilities. Site 2 would require full acquisition of one commercial parcel and no displacements. Site 3 would require full acquisition of four commercial parcels and displacement of one business. Site 1 would not require any acquisitions or displacements. Property impacts associated with the Waterfront Station park-and-ride options are shown in Table 3.3-4 and are in addition to the impacts identified in Table 3.3-3.

My comment: With the height of the Waterfront Station~ 80-90 ft in the air, seems unlikely residents will use it, so a Park and Ride is likely not needed. Going up and down a long spiral staircase can be done by a limited group of people willing to risk meeting a hostile stranger. Is there an elevator? physically possible, still risky. Parents and caregivers with children unlikely to take the risk. Older residents familiar with the news reports of assaults on and near MAX stations seem unlikely to use light rail, even at ground level.

At a recent RTC meeting in Vancouver, an IBR presentation was made, and it was suggested that public comments about crime on and around MAX Lightrail stations and trains would not be considered by IBR. Why limit public input ? This is a primary reason that many women, children, teens, older residents, physically challenged residents do not consider lightrail a safe transit option.
Following is not a complete list of public safety issues on and around TriMet MAX Lightrail stations and trains.

MAX station shooting victim identified as 43-year-old Portland man

https://www.kptv.com/2022/07/06/max-station-shooting-victim-identified-43-year-old-portland-man/

Published: Jul. 6, 2022

Police say 43-year-old Lucian Thibodeaux, of Portland, was shot at a TriMet station in the 16100 block of East Burnside Street around 5 a.m.

Thibodeaux was taken to a local hospital but died from the same day.

Victim killed in shooting near MAX platform identified, injured victim released from hospital

Published: Jul. 9, 2022

https://www.kptv.com/2022/07/09/victim-killed-shooting-near-max-platform-identified-injured-victim-released-hospital/

Just before 11:30 p.m. Wednesday, East Precinct officers responded to a shooting near the MAX platform at East Burnside Street and Northeast 148th Avenue. Officers arrived and found Mendoza-Hernandez dead.

Woman attacked, robbed at Parkrose Transit Station:

https://www.kptv.com/2018/03/30/woman-attacked-robbed-parkrose-transit-station-he-says-hes-going-kill-me/

Portland police said officers responded to the Parkrose Transit Station on Monday at 2:37 p.m. after it was reported a woman was attacked and robbed.

The woman was punched and kicked several times by the suspect and she was knocked to the ground, according to police.

father says 2-year-old daughter was poked by needle on MAX train

Updated: Jan. 10, 2018 at 11:20 AM PST

https://www.kptv.com/2018/01/10/gresham-father-says-2-year-old-daughter-was-poked-by-needle-max-train/

TriMet officials say they see this problem on their trains and buses too, and it’s not uncommon to find hypodermic needles when they clean their vehicles every night.

They encourage everyone to check before taking a seat, and urge that if anyone see’s something, tell a TriMet employee right away.

MAX train rapist sentenced to prison for 2021 assault

(KPTV) – A man accused of sexually assaulting a woman at a Beaverton MAX stop pleaded guilty to all

charges Monday, according to the Washington County District Attorney's Office.

The charges stem from an incident in June 2021. According to the D.A.'s Office, a 31-year-old woman was getting off the MAX train at the Beaverton Creek station just after midnight when William Wesley Gilchrist, 40, began following her. Gilchrist reportedly began attacking her from behind, and sexually assaulting her.

https://www.kptv.com/2022/12/06/max-train-rapist-sentenced-prison-2021-assault/

MAX train passenger with knife arrested after becoming verbally aggressive

Published: Aug. 11, 2022

https://www.kptv.com/2022/08/11/max-train-passenger-with-knife-arrested-after-becoming-verbally-aggressive-police/

MAX deadly shooting likely self defense

https://www.kgw.com/article/news/max-deadly-shooting-likely-self-defense/283-71630580

Man shot during fight on MAX Green Line train in SE Portland

https://www.kgw.com/article/news/crime/one-person-shot-max-green-line/283-6e2d5b3c-4257-4072-893e-f9b662552760

Updated: 10:10 PM PST March 3, 2022

A man was shot https://www.kgw.com/crime during a fight on a MAX Green Line train in Southeast Portland Thursday evening.

Police investigate two incidents, 48 hours apart, of MAX trains hitting people

Published: May. 16, 2022

https://www.kptv.com/2022/05/16/police-investigate-two-incidents-48-hours-apart-max-trains-hitting-people/

MAX train hits pedestrian in Northeast Portland

The incident marked the second crash involving a MAX train and a pedestrian in Portland the past week. On May 13, a MAX train hit and killed a pedestrian around 10:30 p.m. near Northeast 160th and Burnside Street. PPB later identified the pedestrian as 43-year-old Phillip Allen. https://www.kgw.com/article/news/local/max-train-hits-pedestrian-northeast-portland/283-2ac06b7b-3f92-4020-9db5-db842a22d942 https://www.kgw.com/article/news/local/max-train-hits-pedestrian-northeast-portland/283-2ac06b7b-3f92-4020-9db5-db842a22d942

2 teens stabbed on MAX train; Updated: Sep. 3, 2023

(KPTV) - Two teenagers were stabbed and injured on a TriMet MAX train, and the suspect was arrested in southeast Portland Saturday evening, according to Portland police. https://www.kptv.com/2023/09/04/2-teens-stabbed-max-train-man-charged-with-hate-crime-is-wanted-by-florida-court-docs/ https://www.kptv.com/2023/09/04/2-teens-stabbed-max-train-man-charged-with-hate-crime-is-wanted-by-florida-court-docs/

Published: Apr. 1, 2024 at 1:40 PM PDT

PORTLAND Ore. (KPTV) - A 51-year-old man has been charged with second-degree murder in connection with an unprovoked deadly stabbing on a Portland MAX train on Friday, March 29, according to a probable cause affidavit from Portland Police. Shondel L. Larkin was charged with the attack, which took place on an eastbound MAX train Friday evening. He was arrested at the scene after police found him inside the train with a knife and what appeared to be blood on his clothes. https://www.kptv.com/2024/04/01/court-docs-suspect-killed-man-unprovoked-attack-max-train/

Woman found guilty of pushing toddler onto train tracks in Portland

(KPTV) - A mother and child were waiting for a MAX train when Workman shoved the child, who was three at the time, off of the platform and face-first onto the train tracks without warning or provocation. Full story https://www.kptv.com/2024/02/01/woman-found-guilty-after-pushing-toddler-onto-train-tracks/

Man smashes MAX train passenger in the face with rock Mar. 8, 2023

Newly released court documents reveal that a man smashed one passenger in the face with a rock on a MAX train… He was riding on the MAX when he noticed Moan yelling at a female passenger while holding a rock, according to the document. The woman appeared “terrified,” so the victim pulled out his phone and got up to assist her. Full story https://www.kptv.com/2023/03/08/man-smashes-max-passenger-face-with-rock-court-docs/

Man gets prison for threatening MAX train driver with knife, yelling Asian slurs

Jun. 21, 2024 (KPTV) - A man was sentenced to 15 months in prison this week for threatening a MAX train driver with a knife and using derogatory comments against the employee.https://www.kptv.com/2024/06/21/man-gets-prison-threatening-max-train-driver-with-knife-yelling-asian-slurs/

Family of man killed on MAX train files wrongful death lawsuit against TriMet

In the six-page wrongful death lawsuit, the family of Michael Brady claims TriMet officials knew about the ongoing violence on the trains and knew about it long before Brady was killed, but they didn’t do enough to prevent it. In March, 51-year-old Brady was stabbed to death on a MAX train while riding home from work to have dinner with his wife and children. Full story https://www.kptv.com/2024/10/23/family-man-killed-max-train-files-wrongful-death-lawsuit-against-trimet/

IBR Draft SEIS - RECORD #3795 DETAIL

First Name :	Tarn
Last Name :	Ohana
Attachments :	DSEIS-3795_Ohana_Original.pdf (9 kb)

IBR Draft SEIS - RECORD #3795 DETAIL

Submission Date : 11/18/2024
First Name : Tarn
Last Name : Ohana
Business/Organization/Agency :

Submission Input :

First Name:
Tarn

Last Name:
Ohana

Email:
tarn.ohana@gmail.com

City:
Anacortes

US States:
WA

Zip:
98221

Topic Area:
Transportation

Comment:
1. The Draft Supplemental Environmental Impact Statement (DSEIS) purpose and need statement:

a) I am not accustomed to reading high fantasy in draft supplemental impact statements. However, the antique purpose and need statement, which is old enough to purchase alcoholic beverages in Canada, insists upon a 1.5% increase in vehicles using the crossing each year. This assumption undergirds a host of flaws that percolate throughout this and other documents relating to the IBR project. Rather than continue with this delusional work of fiction, the DSEIS analyses and other models that are part of the planning for this project must – yes, must – reflect a much more realistic rate of change in the number of vehicles crossing each year at this location. Holding onto this assumption could seriously jeopardize any continuing work, as the assumption is

verifiably no-where near reality, and incredibly important to how environmental impacts are modeled in the DSEIS. If a challenge is filed under a violation of NEPA, everything will have to be thrown up in the air and all this work performed again anyway.

b) Safety and crash rates for motor vehicle crashes are not normalized for severity. As any road engineer might know, a feature of a road may contribute to crash rates. Not all crashes are equal. The FHWA encourages jurisdictions to evaluate risk based on severe crash rates, i.e., crashes that result in a fatality or a serious injury. Sometimes, we can add features to a roadway that can modestly increase crash rates while eliminating or significantly reducing severe crashes. For example, installing a modified two-lane roundabout at an intersection can modestly increase overall crashes while reducing congestion, but also reduce severe crashes by 80% to 100%. Both the section in the purpose and need statement and the comparison of crash experience in

2. DSEIS 2.02 – Components of the Modified Locally-Preferred Alternative:

a) I have noted over time that the IBR program neatly elides evaluating any tunnel or immersed tube options for the route under the Columbia River. I feel that this is deeply problematic and needs to be evaluated as one of the options for comparison to elevated bridge options. Analysis of the tunnel/immersed tube options should be included in the DSEIS because of the significant environmental benefits that should be considered and compared to other elevated options, specifically, but not exclusively: improvements in air quality; reduction of noise pollution from the deafening and ceaseless roar from an elevated freeway; improvements to safety for migratory birds; improvements in safety for river navigation; etc. Furthermore, the IBR rejected a buried or immersed tube option based on extremely flawed and inaccurate – or dare I say downright fraudulent – assumption on cost.

b) The existing LPA as presented in the DSEIS happens to include ‘shoulder-running’ bus transit facilities. However, buses are very heavy and running them on the edge of a bridge can create significant engineering problems, as we have seen in the Jeanette Williams Memorial (West Seattle) Bridge in Seattle. Creating a pavement-level running light-rail zone on the bridge, as the Tillikum Crossing was designed and currently operates, would allow buses and light rail trains separate and dedicated, heavy infrastructure.

c) The insistence on including all existing interchanges with the LPA bridge options all result in massive, disastrous impacts on the local health and well-being of the area’s residents, workers, visitors, travelers, and environment. I cannot believe the tenacity with which, for reasons unknown and unfathomable, the IBR project insists on maintaining all existing interchanges with the increased height of the bridge. These interchanges *already intersect with an existing freeway.* This existing freeway can be used, without major changes, to bring travelers and freight from the extremities near the Columbia River in reverse and transfer them to the new crossing. For example, people using the crossing – whether a bridge, tunnel, or teleportation portal – in vehicles or freight on Hayden Island would connect with the existing freeway under the new bridge and proceed in a southwesterly direction to a SINGLE new interchange south of OR-120, or at OR-120, before heading back northeast into the crossing. Similarly, people using the crossing in Vancouver at WA-14 or even Mill Plain Blvd, hoping to cross to the Oregon side, would use the existing freeway to head northeast before using a single interchange to connect to the crossing and head southwest. The lack of these types of alternatives is a serious deficiency in the DSEIS and shows a sort of inflexibility that is a discredit to the IBR and the engineering and planning professions.

3. The DSEIS 3.10 – Air Quality:

This section fails to reasonably anticipate increased transit service and transit service capacity in Clark County and south-western Washington State. Hundreds of millions of dollars each year in funds from the Climate Commitment Act of 2021 are transferred to transit projects and expansion of service. The assumption of 1% increase in capacity revenue hours each year for transit is a poor choice. Increasing this rate of change in transit service to 3% or more would be a better choice. Any sections of the DSEIS including assumptions about transit ridership should also include this higher rate. Combined with dedicated transit space on any crossing (bridge, tunnel, teleportation), this higher rate would lead to more significant improvements in air quality compared to the no-build alternative.

JCA comment #: 1070

IBR Draft SEIS - RECORD #3800 DETAIL

First Name :	Sarah
Last Name :	Wright
Attachments :	DSEIS-3800_Wright_Original.pdf (6 kb)

IBR Draft SEIS - RECORD #3800 DETAIL

Submission Date : 11/18/2024
First Name : Sarah
Last Name : Wright
Business/Organization/Agency :

Submission Input :

First Name:
Sarah

Last Name:
Wright

Email:
sarah78wright@gmail.com

US States:
OR

Zip:
97212

Topic Area:
Induced Demand

Comment:
I am opposed to the addition of any new capacity for cars and trucks. The replacement bridge should have the same number of lanes as the old bridge and nothing more for vehicles. This is a bridge replacement; not a freeway expansion! Don't expand freeway capacity; it only creates more traffic problems.

JCA comment #: 1068

IBR Draft SEIS - RECORD #3802 DETAIL

First Name :	Lisa
Last Name :	Maddocks
Attachments :	DSEIS-3802_Maddocks_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #3802 DETAIL

Submission Date : 11/18/2024
First Name : Lisa
Last Name : Maddocks
Business/Organization/Agency :

Submission Input :

First Name:
Lisa

Last Name:
Maddocks

Email:
lisamaddocks5@gmail.com

Phone:
15032677934

City:
Portland

US States:
OR

Zip:
97215

Topic Area:
Transportation

Comment:
The IBR project is no better than the CRC project, which wasted millions from 2005 to 2013. This is the only reason the committee was formed: A revived Project, the Interstate Bridge Replacement Program, was launched in 2017.[31] The Joint Oregon-Washington Legislative Action Committee was formed by the Washington legislature in 2017 to study a bridge replacement, but initially had no Oregon representation for a year.[32][33] The new committee was formed to prevent $140 million in federal funding allocated for the CRC

from being recalled after a deadline, which was extended to 2025.[34] In April 2019, the Washington legislature approved $17.5 million to establish a project office to conduct pre-design and planning work, which was followed by a matching contribution from the Oregon Transportation Commission in August.[31][35}
A new timeline for the project, with the start of environmental review in 2020 and construction by 2025, was approved by the joint committee in late 2019.[36]
If you are unfamiliar with the CRC project you can read all about it here:
https://en.wikipedia.org/wiki/Columbia_River_Crossing
They just love to waste our tax $$$ to accomplish absolutely nothing!!!
Face it folks, people will NEVER stop driving, and Portland's infrastructure was not built to support the amount of people/cars it has now, and no amount of bicycling, walking, or bus riding is going to change that. We (City Council) have allowed the total destruction of what was once a livable city, and tried to turn it into some sort of futuristic city where there are a billion people and no cars. PBOT has already screwed up our city enough, and the IBR project is no different!!!
CRC Project Summary July, 2011
https://leg.wa.gov/JTC/Documents/Studies/P3/August2_3Workshop/CRCProjectSummary.pdf

JCA comment #: 1067

IBR Draft SEIS - RECORD #3804 DETAIL

First Name :	Sarah
Last Name :	Wright
Attachments :	DSEIS-3804_Wright_Original.pdf (6 kb)

IBR Draft SEIS - RECORD #3804 DETAIL

Submission Date : 11/18/2024
First Name : Sarah
Last Name : Wright
Business/Organization/Agency :

Submission Input :

First Name:
Sarah

Last Name:
Wright

Email:
sarah78wright@gmail.com

US States:
OR

Zip:
97212

Topic Area:
Transportation

Comment:
This project should not extend beyond replacing the bridge and upgrading bike and walking paths to current standards that will finally make them inviting to use. Don't build tight spirals for the paths if you can avoid it! And don't put the path and light rail on opposite sides of the bridge! They need to be on the same side to be attractive for users.

JCA comment #: 1071

IBR Draft SEIS - RECORD #3807 DETAIL

First Name :	Robert
Last Name :	Butler
Attachments :	DSEIS-3807_Butler_Original.pdf (5 kb)

IBR Draft SEIS - RECORD #3807 DETAIL

Submission Date : 11/19/2024
First Name : Robert
Last Name : Butler
Business/Organization/Agency :

Submission Input :

I am an 81 year old resident in Clark County, Washington State, who believes the current I-5 Bridge with Light Rail proposal requiring unlimited tolling and unreasonable tax demands by TriMet, ignores the will of the people and burdens us with regressive and unreasonable taxation without representation—clearly an unconstitutional over-reach by its proposers.

Respectfully,

Robert M Butler
6110 NE 56th Street
Vancouver, WA 98661
360-931-0204

IBR Draft SEIS - RECORD #3808 DETAIL

First Name :	Daniel
Last Name :	Fuller
Attachments :	DSEIS-3808_Fuller_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #3808 DETAIL

Submission Date : 11/18/2024
First Name : Daniel
Last Name : Fuller
Business/Organization/Agency :

Submission Input :

First Name:
Daniel

Last Name:
Fuller

Email:
danielpfuller@gmail.com

Phone:
15038208692

City:
Portland

US States:
OR

Zip:
97209

Topic Area:
Induced Demand

Comment:
The flawed traffic forecasts used by the IBR project are based on misguided assumptions about future travel demand. By exaggerating present traffic volumes, the forecasts hide the *induced* traffic that this project will create through additional travel lanes. A "right-sized" bridge replacement would is congestion by providing alternatives to private automobile use, namely transit and bicycling connections between Oregon and washington.

JCA comment #: 1069

IBR Draft SEIS - RECORD #3814 DETAIL

First Name :	Colin
Last Name :	Cortes
Attachments :	DSEIS-3814_Cortes_Original.pdf (42 kb) Outlook-Logo WSP.png (899 bytes) image001.png (1 kb) image002.png (1 kb) image003.png (1 kb) image004.png (1 kb) image005.png (856 bytes) image006.png (821 bytes) Colin Cortes Comment.docx (22 kb)

First Name

Colin

Last Name

Cortes

Business or Organization

Email (enter N/A if none)

colincortes@fastmail.com

Phone Number

5037466503

Address

9452 SW Maplewood Dr Apt F60

City

Tigard

State

OR

Zip Code

97223-6160

Comment

November 18, 2024 Re: ODOT & WSDOT Interstate Bridge Replacement (IBR) Project Draft Supplemental Environmental Impact Statement (EIS) I oppose the project for reasons include that: A. Traffic modeling exaggerates future traffic growth. The Oregonian on June 19, 2024 reported 15,000 fewer vehicles travel on the I-5 bridge between Portland and Vancouver now than before the COVID-19 pandemic. Economist Joe Cortright in his editorial, "Inventing millions of phantom trucks to sell a wider bridge" (City Commentary blog, October 28, 2024, <https://cityobservatory.org/inventing-millions-of-phantom-trucks-to-sell-a-wider-bridge/>) reports that modeling overstates current I-5 truck traffic by almost 70 percent -- more than 2 million "phantom" trucks per year. The model that Metro deployed modeled that more than 17,000 trucks crossed the I-5 bridges each day in 2019; but, Oregon Dept. of Transportation (ODOT) traffic data showed fewer than 10,000 truck

crossings. Previous truck growth predictions for the project when it was termed the Columbia River Crossing (CRC) proved to be wildly incorrect. The project EIS predicted truck traffic would grow more than 2% per year between 2005 and 2030; but, it has declined at an annual rate of nearly 5%. The decline isn't an anomaly. Statewide, Oregon truck freight volumes have declined 22% in the past 13 years, according to federal statistics reported Cortright. B. Cost: In December 2022, the IBR projected the project—once estimated at roughly $4 billion—would cost between $5 and $7.5 billion. C. Height: The proposed bridge height of 116 feet is too low to accommodate tall ships, the U.S. Coast Guard reported. D. Displacement: At least 36 businesses will be displaced to make room for construction, affecting more than 600 workers, as well as residents of at least 43 houses, reported The Oregonian. E. A less costly and sensible alternative to the IBR project is available. See the video "A Common Sense Alternative to the CRC" from April 2011 remains applicable to the Interstate Bridge Replacement (IBR) project and is found on both Vimeo at http://www.youtube.com/watch?v=sPB1jtmHVkk and YouTube at http://www.youtube.com/watch?v=sPB1jtmHVkk. The creators are George M. Crandall and Jim Howell. The alternative consists of five phases to: 1. Fix the BNSF rail bridge so it's lift span is more centered on the river. This would eliminate ships needed to travel along a broad "S" curve and eliminate 95% of necessary lifts on the existing I-5 Bridge. 2. Build a local bridge between Hayden Island and Portland proper. 3. Build a new bridge that includes passenger rail tracks and is closer to the existing rail bridge than the I-5 bridge. 4. Upgrade the I-5 bridge against earthquakes. 5. Build a local bridge between Hayden Island and Vancouver. In short, the draft EIS is faulty because the assumptions of the project on which it is based are faulty. Sincerely, Colin Cortes 9452 SW Maplewood Dr, Apt. F60 [redacted]

IBR Draft SEIS - RECORD #3816 DETAIL

First Name :	Matchu
Last Name :	Williams
Attachments :	DSEIS-3816_Williams_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #3816 DETAIL

Submission Date :	11/18/2024
First Name :	Matchu
Last Name :	Williams
Business/Organization/Agency :	Southeast Uplift Neighborhood Program

Submission Input :

First Name:
Matchu

Last Name:
Williams

Business or Organization:
Southeast Uplift Neighborhood Program

Email:
matchu@seuplift.org

City:
Portland

US States:
OR

Zip:
97214

Topic Area:
Transportation

Comment:
The Interstate Bridge Replacement (IBR) study area is approximately a 5-mile section of I-5 between the SR 500/39th Street interchange in Vancouver and the Interstate Avenue/Victory Boulevard interchange in Portland. Section 3.1.2 “Existing Conditions” of the IBR Draft Supplemental Environmental Impact Statement (Draft SEIS) states that “ODOT and WSDOT define congestion as below a certain threshold” and elects to utilize the definition provided by ODOT. This definition is contrary to the criteria provided by Washington State

Department of Transportation in Chapter 1410 of the High-Occupancy Vehicle Facilities design manual (Design Manual M 22-01.23) regarding High Occupancy Vehicle (HOV) lane design criteria, which state that the facility design “responds to demonstrated congestion or near-term anticipated congestion.” Congestion is further defined within the document as “average speeds less than 30 mph during peak periods over an extended distance.”

The Interstate Bridge Program spans nearly five miles, with a majority occurring within Washington state. As a bi-state program, the IBR should adhere to a definition applicable within both states, not just Oregon. Calculate the congestion in the Final SEIS using the WSDOT criteria cited.

Chapter 1410 further emphasizes the benefits of separation of HOV facilities, including transit, from other transportation modes. It discourages utilization of existing shoulders for transit citing elevated maintenance costs and decreased transit service reliability as well as traffic enforcement considerations.

Section 705 “Roadway and Intersection Design for Transit” within the ODOT Roadway Engineering Section’s Highway Design Manual encourages that Bus Rapid Transit occur in “a dedicated pathway” and “located in the center of the roadway” as opposed to along the shoulder of freeways. The Manual on Uniform Traffic Control Devices further recommends barrier-separated HOV lanes to ensure reliable, consistent flow of traffic particularly during peak travel times.

Pair active transportation facilities and the bridge multi-use path with transit and adjacent to light-rail service. The grading requirements and limitations required of light rail and active transportation can work in tandem rather than separate. Keeping transit and active transportation adjacent provides safety through regular visual connection between transit operations and people walking, biking, and rolling across the bridge with recourse options during emergency situations and should include adequate lighting to minimize lighting gap deficits. Likewise the active transportation pathway should include an extension into the heart of downtown Vancouver, Washington at Evergreen Boulevard next to the Fort Vancouver Regional Library. This would expand the travel options beyond the spiral required otherwise.

Placing transit between active transportation and regular traffic lanes ensures a buffer and noise reductions for people walking, biking, and rolling that must be enhanced with barrier separation from regular travel lanes.

Finally, the enormous costs associated with the project and the scale of it need to be right-sized. The second auxiliary lanes being examined are an expense that we cannot afford for the minimal benefits articulated within the Draft SEIS. Instead, the recommendations on tolling from the ODOT Equity and Mobility Advisory Committee should be followed to ensure the replacement bridge would better serve the users of the bridge while remaining financially accessible.

Thank you for your consideration of these comments.

JCA comment #: 1072

IBR Draft SEIS - RECORD #3818 DETAIL

First Name :	Benjamin
Last Name :	Page
Attachments :	DSEIS-3818_Wenzel_Original.pdf (5 kb) Screenshot_20241118-215054.png (296 kb)

IBR Draft SEIS - RECORD #3818 DETAIL

Submission Date :	11/19/2024
First Name :	Peter
Last Name :	Wenzel
Business/Organization/Agency :	Studio Functions Properties LP

Submission Input :

Your web server crashes when comments are submitted on the site, as shown in the attached screenshot. So I am copying the text below to email instead.

Benjamin Page
Studio Functions Properties LP
1625 N Jantzen Ave, Portland OR 97217
626-390-1806
bpage-ibr@ziiz.us

We own one of the floating homes and slips at Jantzen Beach Moorage. Our exact home is identified on diagrams as being on the furthest east row (nearest the freeway bridge) labeled as being "temporarily impacted". Please explain exactly how the temporary impact will manifest. Will the home need to be moved to clear an over-water construction easement? If so, where and by whom? If left in place, will it be impacted by construction noise, pollution, and danger?

After the row of homes immediately to our east are removed (as indicated by the "residential impacted" shading), what will be the hydrologic impact on our dock, which would no longer be protected by an upstream dock and row of homes?

Land surrounding and including the JBMI East gate and first ramp are indicated as being taken. How will the remaining residents reach their homes, from both a driving standpoint and walking from on-shore parking to the homes?

The proposal diagrams, including video "fly-over" depict a smaller auxiliary bridge being built only a few feet from our home. This would seem to imply a permanent impact that must be mitigated, and would likely render the homes in the immediate area unusable. The impacts and mitigations are inadequately accounted for.

IBR Draft SEIS - RECORD #3819 DETAIL

First Name :	Margaret
Last Name :	Tweet
Attachments :	DSEIS-3819_Tweet_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #3819 DETAIL

Submission Date : 11/19/2024
First Name : Margaret
Last Name : Tweet
Business/Organization/Agency :

Submission Input :

“Here in the Portland metro area, TriMet data mirrors the national trend of reduced transit ridership. In March 2024, ridership remained 34 percent below pre pandemic levels and about half its 2012 peak https://www.oregonlive.com/environment/2024/04/earth-day-can-portland-recover-its-bike-and-transit-prime.html.

At C-TRAN, ridership was down nearly 37 percent at the end of 2022 compared to pre pandemic ridership. Furthermore, C-TRAN ridership peaked in 1999 at 7.75 million boardings. They had just 3.97 million boardings on their fixed route system in 2022; 49 percent below the peak almost a quarter century ago.

This issue is vitally important to Clark County and Portland metro citizens because the Interstate Bridge Replacement Program (IBR) team members are telling the community that there will be between 26,000 and 33,000 daily transit boardings on the I-5 corridor in 2045. This is likely designed to justify their proposal that $2 billion be spent on a 3-mile MAX light rail extension into Vancouver as part of their $7.5 billion proposal.

C-TRAN offers the only transit service over the Columbia River. The agency experienced a 61 percent drop in passenger boardings on its express bus system over the two years of pandemic lockdowns. The agency shared numbers for nine separate routes traveling over the river for the 2019 to 2021 years. In 2019, it had 1.4 million boardings which then declined to 555,000 in 2021..

Express Routes crossing the I-5 Bridge saw an average of just 523 daily boardings in 2022, C-TRAN shared https://www.clarkcountytoday.com/news/c-tran-2022-financial-results-show-improvement/ with Clark County Today. Express Routes crossing the I-205 bridge saw an average of 273 daily boardings. Overall, C-TRAN carried 14.5 people per hour of service across their entire bus network in 2022, according to its annual report https://www.c-tran.com/images/CAFR/c-tran_2022_acfr.pdf.

For the IBR transit projections to be accurate, daily ridership on the I-5 corridor would have to increase fifty-fold to reach their 26,000 number. It would have to increase 63 times to reach the 33,000 number.”

“With over one quarter of the $7.5 billion project being the 3-mile light rail extension, and the price tag of the project scheduled to increase according to Johnson, one might wonder why they don’t consider the cheaper and more flexible alternative of buses. C-TRAN has built two Bus Rapid Transit lines for $50 million each, a small fraction of the $2 billion cost of extending light rail. Furthermore, it would eliminate the “new revenues” (aka taxes) TriMet is demanding from both states for the operations and maintenance of the light rail into Clark County.

Nationally and locally, transit ridership remains significantly depressed. As more people work from home, others seek to work in suburbs instead of downtown.”

“The Cascade Policy Institute has documented multiple broken promises by TriMet https://www.clarkcountytoday.com/news/trimets-broken-promises-on-getting-people-to-use-transit/, when it comes to the MAX light rail service. Every time they have failed to meet those promised levels of service or passengers being carried.

TriMet officials promised the Federal Transit Administration (FTA) in their Full-Funding Grant Agreement that Yellow Line peak-hour trains would arrive every 10 minutes and off-peak trains every 15 minutes. The promised service according to the Environmental Impact Statement (EIS) was supposed to reach eight trains during peak hours in 2020, or one train every 7.5 minutes.

The EIS forecasted ridership in the corridor would dramatically increase with the building of the Yellow Line. By 2020, the line’s ridership was expected to have 18,100 average weekday riders. It was 5,290, with a shortfall of 12,810 riders. In March 2024, ridership recovered to 10,880 boardings or 5,440 riders. MAX light rail costs https://trimet.org/about/pdf/trimetridership.pdf have increased 27.5 percent from a year earlier to $9.73 per boarding. “

‘With one out of eight people working from home, is there a need for any “high capacity” mass transit over the Columbia River? National and local ridership trends indicate the answer is no.”

Source: Report at Clark County Today on CTRAN and TriMet ridership data

https://www.clarkcountytoday.com/news/national-and-local-transit-ridership-down-significantly-feds-report/

CRC forecasts on ridership have not materialized. These forecasts seem inaccurate and unrealistic, like CRC was.

Margaret Tweet, Camas 98607

IBR Draft SEIS - RECORD #3820 DETAIL

First Name :	Matthew
Last Name :	Alexander
Attachments :	D1-3820_Alexander_20241118_Original.pdf (6 kb)

IBR Draft SEIS - RECORD #3820 DETAIL

Submission Date : 11/18/2024
First Name : Matthew
Last Name : Alexander
Business/Organization/Agency :

Submission Input :

First Name:
Matthew

Last Name:
Alexander

Email:
mdalexand1@gmail.com

City:
Hillsboro

US States:
OR

Zip:
97123

Topic Area:
Climate Change

Comment:
It is incumbent on us, that we reduce greenhouse gas emissions dramatically in the next decade. This is not on track to happen, and will certainly not happen if we take the way things currently are to be the way things continue to be.

Reducing VMT is necessary in this fight. Unfortunately, the proposed design does little to reduce auto travel, estimating a 62% increase in study-area miles we drive 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 carbon reduction goals.

The entire Environmental Impact Statement hinges on the assumption that IBR's traffic modeling projections were accurate for the past, present and future; however, they clearly have been inflated in order to justify priors and rubber stamp a project which is stuck in a 20th century mindset. The Columbia River Crossing predicted traffic would grow from 130k trips/weekday to 180k in 2025, which clearly did not happen; in fact, traffic growth stayed flat entirely! And now IBR wants us to believe that growth will resume and hit 180k by 2045, despite the total lack of growth even since that prediction was made.

We must factor the impact of induced demand into our transportation infrastructure projects, to save the climate.

JCA comment #: 1073

IBR Draft SEIS - RECORD #3823 DETAIL

First Name :	KATHRYN
Last Name :	GAVULA
Attachments :	DSEIS-3823_GAVULA_Original.pdf (9 kb)

IBR Draft SEIS - RECORD #3823 DETAIL

Submission Date :	11/18/2024
First Name :	KATHRYN
Last Name :	GAVULA
Business/Organization/Agency :	
Attachments :	D1-3823_Gavula_20241118_Original.pdf (5 kb)

Submission Input :

First Name:
KATHRYN

Last Name:
GAVULA

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Air Quality

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.

JCA comment #: 809

IBR Draft SEIS - RECORD #3823 DETAIL

Submission Date : 11/18/2024
First Name : KATHRYN
Last Name : GAVULA
Business/Organization/Agency :

Submission Input :

First Name:
KATHRYN

Last Name:
GAVULA

Email:
katiegavula@hotmail.com

City:
Portland

US States:
OR

Zip:
97215

Topic Area:
Air Quality

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.

JCA comment #: 809

IBR Draft SEIS - RECORD #3825 DETAIL

First Name :	KATHRYN
Last Name :	GAVULA
Attachments :	DSEIS_03825_GAVULA_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #3825 DETAIL

Submission Date : 11/18/2024
First Name : KATHRYN
Last Name : GAVULA
Business/Organization/Agency :

Submission Input :

First Name:
KATHRYN

Last Name:
GAVULA

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Public Services and Utilities

Comment:
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.

JCA comment #: 807

IBR Draft SEIS - RECORD #3827 DETAIL

First Name :	KATHRYN
Last Name :	GAVULA
Attachments :	DSEIS-3827_GAVULA_Original.pdf (10 kb)

IBR Draft SEIS - RECORD #3827 DETAIL

Submission Date :	11/18/2024
First Name :	KATHRYN
Last Name :	GAVULA
Business/Organization/Agency :	
Attachments :	D1-3827_Gavula_20241118_Original.pdf (5 kb)

Submission Input :

First Name:
KATHRYN

Last Name:
GAVULA

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
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.

JCA comment #: 805

IBR Draft SEIS - RECORD #3827 DETAIL

Submission Date : 11/18/2024
First Name : KATHRYN
Last Name : GAVULA
Business/Organization/Agency :

Submission Input :

First Name:
KATHRYN

Last Name:
GAVULA

Email:
katiegavula@hotmail.com

City:
Portland

US States:
OR

Zip:
97215

Topic Area:
Transportation

Comment:
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.

JCA comment #: 805

IBR Draft SEIS - RECORD #3829 DETAIL

First Name :	Wendy
Last Name :	Wagner
Attachments :	DSEIS-3829_Wagner_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #3829 DETAIL

Submission Date : 11/18/2024
First Name : Wendy
Last Name : Wagner
Business/Organization/Agency :

Submission Input :

First Name:
Wendy

Last Name:
Wagner

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
As a pedestrian and runner, I don't feel this design feels safe enough. Please add lighting ALL THROUGHOUT the multi-use path, and separate pedestrians from freeway traffic by placing the transit line between the multi-use path and the roadway. Also, it is miserable to use a path without any kind of shade, so please build or plant natural and human-made shade.

JCA comment #: 803

IBR Draft SEIS - RECORD #3831 DETAIL

First Name :	Bob
Last Name :	Ortblad
Attachments :	DSEIS-3831_Ortblad_Original.pdf (238 kb) IBRdeadlybribe.pdf (220 kb)

IBR Draft SEIS - RECORD #3831 DETAIL

Submission Date :	11/18/2024
First Name :	Bob
Last Name :	Ortblad
Business/Organization/Agency :	
Attachments :	IBRdeadlybribe.pdf (220 kb)

Submission Input :

First Name:
Bob

Last Name:
Ortblad

Business or Organization:
None

Email:
[redacted]

Phone:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
see attachment
IBR's deadly bribe

Attachment (maximum one):
IBR-deadly-bribe.pdf

JCA comment #: 819

CLARK COUNTY TODAY.com
Your News Source with Integrity
Sept. 10, 2024

Letter: The IBR's deadly bribe

Retired engineer Bob Ortblad raises safety concerns about the I-5 Bridge replacement project

Editor's note: *Opinions expressed in this letter to the editor are those of the author alone and do not reflect the editorial position of ClarkCountyToday.com*



Bob Ortblad

The Interstate Bridge Replacement Program (IBR) is bribing C-TRAN with a promise of eight double-decker electric buses in exchange for C-TRAN's support of IBR's freeway expansion and

dangerous bridge.

These double-decker buses will travel in a bus-on-shoulder lane only three feet from the guardrail The IBR's bridge will have a steep 4 percent downgrade as well as a curve

plus a frequently wet or icy bridge deck.

Additlonally, a 60 mph crosswind (occurring 175 hours/year) could potentlally blow a double-decker bus sideways and up and over the guardrail. A loaded bus of 80 riders could plunge 150 feet into the Columbia River or drop 100 feet onto downtown Vancouver.

The same deadly wind and road conditions will cause recreational vehicles, trailers, and empty semi-trucks to be blown out of their lane or completely over.

This is the latest example of IBR's incompetent leadership. Previously, the IBR has fraudulently disqualified a safer Immersed tunnel alternative that would protect traffic from wind, rain, and ice.

Bob Ortblad MSCE, MBA
Retired Professional Engineer
[redacted]

CLARK COUNTY TODAY.com
Your News Source with Integrity
Sept. 10, 2024

Letter: The IBR's deadly bribe

Retired engineer Bob Ortblad raises safety concerns about the I-5 Bridge replacement project

Editor's note: *Opinions expressed in this letter to the editor are those of the author alone and do not reflect the editorial position of ClarkCountyToday.com*



Bob Ortblad

The Interstate Bridge Replacement Program (IBR) is bribing C-TRAN with a promise of eight double-decker electric buses in exchange for C-TRAN's support of IBR's freeway expansion and

dangerous bridge.

These double-decker buses will travel in a bus-on-shoulder lane only three feet from the guardrail The IBR's bridge will have a steep 4 percent downgrade as well as a curve

plus a frequently wet or icy bridge deck.

Additlonally, a 60 mph crosswind (occurring 175 hours/year) could potentlally blow a double-decker bus sideways and up and over the guardrail. A loaded bus of 80 riders could plunge 150 feet into the Columbia River or drop 100 feet onto downtown Vancouver.

The same deadly wind and road conditions will cause recreational vehicles, trailers, and empty semi-trucks to be blown out of their lane or completely over.

This is the latest example of IBR's incompetent leadership. Previously, the IBR has fraudulently disqualified a safer Immersed tunnel alternative that would protect traffic from wind, rain, and ice.

Bob Ortblad MSCE, MBA
Retired Professional Engineer
Seattle

IBR Draft SEIS - RECORD #3833 DETAIL

First Name :	Jason
Last Name :	Cromer
Attachments :	DSEIS-3833_Cromer_Original.pdf (11 kb)

IBR Draft SEIS - RECORD #3833 DETAIL

Submission Date :	11/18/2024
First Name :	Jason
Last Name :	Cromer
Business/Organization/Agency :	
Attachments :	D1-3833_Cromer_20241118_Original.pdf (5 kb)

Submission Input :

First Name:
Jason

Last Name:
Cromer

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
The option of the C-Street off-ramp would induce further demand to introduce more vehicles in downtown Vancouver. The city's Transportation System Plan, Parking Plan, Comprehensive Plan, and Climate Action Plan all signify a strong removal of surface parking, a reduction in road capacity downtown, as well as a stronger emphasis on walking, bicycling, and transit usage. Even though this is true for all of Vancouver, downtown is especially constrained given the small area to work with. Have these City Plans been taken into account for the C-Street off-ramp option, and have the negative effects of the increase of traffic, congestion, air pollution, and safety risks to pedestrians and bicyclists been included in the Draft SEIS for inducing more

vehicle traffic into downtown Vancouver via the C-Street off-ramp?

JCA comment #: 817

IBR Draft SEIS - RECORD #3833 DETAIL

Submission Date : 11/18/2024
First Name : Jason
Last Name : Cromer
Business/Organization/Agency :

Submission Input :

First Name:
Jason

Last Name:
Cromer

Email:
jasonmcromer@gmail.com

City:
Vancouver

US States:
WA

Zip:
98660

Topic Area:
Transportation

Comment:
The option of the C-Street off-ramp would induce further demand to introduce more vehicles in downtown Vancouver. The city's Transportation System Plan, Parking Plan, Comprehensive Plan, and Climate Action Plan all signify a strong removal of surface parking, a reduction in road capacity downtown, as well as a stronger emphasis on walking, bicycling, and transit usage. Even though this is true for all of Vancouver, downtown is especially constrained given the small area to work with. Have these City Plans been taken into account for the C-Street off-ramp option, and have the negative effects of the increase of traffic, congestion, air pollution, and safety risks to pedestrians and bicyclists been included in the Draft SEIS for inducing more vehicle traffic into downtown Vancouver via the C-Street off-ramp?

JCA comment #: 817

IBR Draft SEIS - RECORD #3835 DETAIL

First Name :	Jason
Last Name :	Cromer
Attachments :	DSEIS-3835_Cromer_Original.pdf (10 kb)

IBR Draft SEIS - RECORD #3835 DETAIL

Submission Date :	11/18/2024
First Name :	Jason
Last Name :	Cromer
Business/Organization/Agency :	Cycle Vancouver
Attachments :	D1-3835_Cromer_20241118_Original.pdf (5 kb)

Submission Input :

First Name:
Jason

Last Name:
Cromer

Business or Organization:
Cycle Vancouver

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Land Use and Economy

Comment:
Specifically regarding the Vancouver side of the project, several buildings will be demolished and more land will be utilized to expand the overall surface area dedicated to I5 in the project area. Would it be possible to mitigate these by not implementing the collector/distributors in the current design, as to not expand the width of

the project area?
It would be beneficial to reduce the overall size of the freeway, as we have historically already seen the drastically negative impact of freeways in cities, the I5 splitting Vancouver being no exception.

JCA comment #: 815

IBR Draft SEIS - RECORD #3835 DETAIL

Submission Date :	11/18/2024
First Name :	Jason
Last Name :	Cromer
Business/Organization/Agency :	Cycle Vancouver

Submission Input :

First Name:
Jason

Last Name:
Cromer

Business or Organization:
Cycle Vancouver

Email:
jasonmcromer@gmail.com

City:
Vancouver

US States:
WA

Zip:
98660

Topic Area:
Land Use and Economy

Comment:
Specifically regarding the Vancouver side of the project, several buildings will be demolished and more land will be utilized to expand the overall surface area dedicated to I5 in the project area. Would it be possible to mitigate these by not implementing the collector/distributors in the current design, as to not expand the width of the project area?
It would be beneficial to reduce the overall size of the freeway, as we have historically already seen the

drastically negative impact of freeways in cities, the I5 splitting Vancouver being no exception.

JCA comment #: 815

IBR Draft SEIS - RECORD #3837 DETAIL

First Name :	Kate
Last Name :	Walker
Attachments :	3837_Walker_Original.pdf (13 kb)

IBR Draft SEIS - RECORD #3837 DETAIL

Submission Date :	11/18/2024
First Name :	Kate
Last Name :	Walker
Business/Organization/Agency :	
Attachments :	D1-3837_JCA_20241118_Original.pdf (9 kb)

Submission Input :

First Name:
Kate

Last Name:
Walker

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
I've been driving my own automobile since 1994 - I was sixteen and my father was tired of driving me back and forth to college, so he gave me his old car. In 30 years of car ownership I have lived in two of the most congested cities in the country: Washington D.C., and Austin Texas. I've driven a car in many car-infested places including Houston, Dallas/Fort Worth, San Antonio, Atlanta, San Francisco, Orlando, Miami, and Tampa. I have seen so much car traffic - I don't even want to think about how much time I've spent sitting in traffic during my life.

I've spent many hours in stop-and-go on I-270 (the Dwight D. Eisenhower highway - 16 lanes) waiting to get to the Beltway. I lived less than a mile from I-95 (10 lanes) and my preferred route to work took twice as long so that I didn't have to sit on the highway. Occasionally I would have to take I-495 (10 lanes) around the east side of DC to do a presentation on the other side of the city, and I dreaded getting stuck at the Route 50 (10 lanes) highway interchange, where there was congestion from 5am to 10pm during a "normal" weekday.

When I moved to Austin the MoPac expressway (8 lanes) was under construction to add a tolled express lane in either direction, but congestion didn't improve after the lanes were added. Everyone in Austin knows to avoid I-35 (the Purple Heart Trail, 6 travel lanes and 4 frontage lanes), especially since it's going to be a decade of construction before they're done widening it to 20 total travel lanes. The frontage lanes are also some of the deadliest places in the entire city to be a pedestrian or cyclist.

In every city and state that I've lived in for the last decade, there's been a "comprehensive plan" or similar - a policy document that describes our goals. Those goals are always to promote walking, cycling, public transportation, and to discourage extra VMT (vehicle miles traveled).

We publish these policies over and over and over again - when are we going to start engineering like they're true?

I understand that for the most part, our elected officials don't understand induced demand. I understand that our entire transportation system, from the elected officials to the newest intern in the planning office, is motivated by a cadre of suburban homeowners who love to scream about traffic congestion. And I understand that when you combine those two facts, it's much easier to just agree to add some more lanes and hope that it'll work this time.

We need to stop pretending that more lanes solves traffic problems.

I'm looking at the Purpose and Need statement, because every engineering project should proceed from the purpose and needs. For section 1.3.1 - I agree with several points: we should improve traffic safety, public transportation, and structural integrity. The parts that concern me relate to improving highway freight operations and traffic operations.

Maybe you don't agree with the concept of induced demand, but we don't even need to go there yet. Improving highway operations means moving more vehicles through this area. Why is this a desired outcome? The north side of the bridge lands in the middle of downtown Vancouver - why does highway freight need to go through the middle of the downtown? Why does high speed motor traffic need to go through the downtown? Highway operations generate significant pollution - air pollution from microparticles and exhaust, audio pollution from tire road noise, and light pollution from headlights. This highway drowns the local neighborhood in pollution. Why is this a desired outcome?

Why are we not crafting policy that would remove or reduce this pollution?

What would happen if the LPA reduced the number of travel lanes and reduced the speed limit on the bridge? Wouldn't it divert that truck traffic onto the I-205, away from the valuable downtown area? Induced demand

says that it would reduce the number of trips taken by private vehicles, potentially moving those trips to a different travel mode. Even without induced demand, it would make a huge difference to the quality of life for people living in downtown Vancouver.

On the south side of the river, all that long-distance traffic gets routed through Portland, including where I live in the Buckman neighborhood. I would personally love it if y'all could reduce the amount of pollution flowing through my neighborhood. I would love to have the river back. I would love to see development reoccur in those blighted blocks near I-5 - blocks that are undesirable because they're right next to a major interstate highway. There are many city blocks that are effectively worthless because of the car traffic flowing nearby. Induced demand says that increasing the lanes on the bridge will actually increase traffic in my neighborhood, so not only am I in the "exhaust zone" but adding lanes to the bridge will increase congestion on my local streets too.

Why are you not centering the policies that we know would help resolve those problems?

When we get to section 1.3.2 - the first paragraph centers travel demand and congestion. Why aren't we going back to those high-level goals of reducing car traffic and co2 emissions? Why don't we build a bridge that really prioritizes public transit and active transportation - a bridge that would actually *help* us reach our climate goals?

Paragraph 2 - Why does the "most important freight highway on the West Coast" go right through the center of two cities, and more importantly why are you not making changes to move that route further away from the cities? Why are you not crafting policies to shift freight operations back onto railroads, which generate significantly less pollution?

Paragraph 3 is a good goal, but this plan doesn't significantly improve bus schedules because it doesn't actually prioritize bus traffic. Why not put a dedicated BRT lane on the bridge? BRT would help us achieve our climate and equity goals. Even if BRT isn't an option, surely there must be some technical solution to prioritizing bus traffic that would be far more effective than more general-purpose travel lanes.

Paragraph 4 is fine, but slowing traffic would certainly help achieve safety goals, and would be significantly cheaper than the proposed huge, speedy intersections. Why not just slow the traffic?

Paragraph 5 is fine, but bike/ped facilities are on the wrong side of the bridge. Putting it on the same side as the transit makes so much more sense, to allow for flexible multimodal connections and infrastructure sharing. Also on the list of things that would make more sense: not being a hundred feet in the air. Being ADA compliant is important to me (a disabled veteran), but the enormous spiraling ramps will make this an uncomfortable and rarely-used route. The Tillicum is a great example - it's very comfortable to cross. Contrast the I-205 bridge which was described to me by an avid cyclist: "I scream the entire time I'm on the 205, but nobody can hear me over the traffic noise."

I understand the need for a new bridge to meet seismic goals, but we should be building a bridge that reduces car and truck traffic through our cities, with comfortable active transportation, and that prioritizes public transportation.

I moved here because after 30 years of car ownership, I never want to own a car again. I want to see us reach our climate goals. I want to see cities where everyone can move around, no matter if they own an expensive car or not. I want to be able to easily ride my bike to Vancouver.

Please choose climate and equity. Please remove the extra vehicular lanes. Please lower the speed limit and narrow the travel lanes. Please choose the movable span option to lower the height of the bridge and provide comfortable active transportation. Please move the active transportation to the same side as the public transportation. Please add tolling to reduce the incentive for private vehicles to use this bridge, and provide equitable solutions to gently move citizens away from expensive motor vehicles.

JCA comment #: 813

IBR Draft SEIS - RECORD #3839 DETAIL

First Name :	KATHRYN
Last Name :	GAVULA
Attachments :	DSEIS-3839_Gavula_Original.pdf (7 kb)

IBR Draft SEIS - RECORD #3839 DETAIL

Submission Date : 11/18/2024
First Name : KATHRYN
Last Name : GAVULA
Business/Organization/Agency :

Submission Input :

First Name:
KATHRYN

Last Name:
[redacted]

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Induced Demand

Comment:
Right-Sizing the Project:
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 #: 811

IBR Draft SEIS - RECORD #3843 DETAIL

First Name :	Abel
Last Name :	Quintero
Attachments :	DSEIS-3843_Quintero_Original.pdf (8 kb)

IBR Draft SEIS - RECORD #3843 DETAIL

Submission Date : 11/18/2024
First Name : Abel
Last Name : Quintero
Business/Organization/Agency :

Submission Input :

First Name:
Abel

Last Name:
Quintero

Email:
[redacted]

City:
[redacted]

US States:
[redacted]

Zip:
[redacted]

Topic Area:
Transportation

Comment:
Hello,
As a Portland citizen who utilizes the Interstate Bridge on a frequent basis, I would urge you to consider the following areas in your planning process.

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.
Public 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.

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.

Thank you for your consideration!
Abel Q

JCA comment #: 730

IBR Draft SEIS - RECORD #3844 DETAIL

First Name :	Linda and Brian
Last Name :	Burright
Attachments :	DSEIS-3844_Burright_Original.pdf (2 mb) BNA_Comment_Water_Access_Point.pdf (2 mb)

IBR Draft SEIS - RECORD #3844 DETAIL

Submission Date :	11/21/2024
First Name :	Linda and Brian
Last Name :	Burright
Business/Organization/Agency :	
Attachments :	BNA_Comment_Water_Access_Point.pdf (2 mb)

Submission Input :

[You don't often get email from [redacted] Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

Comment submitted to the Interstate Bridge Replacement Draft SEIS

By Linda and Brian Burright

[redacted]
[redacted]

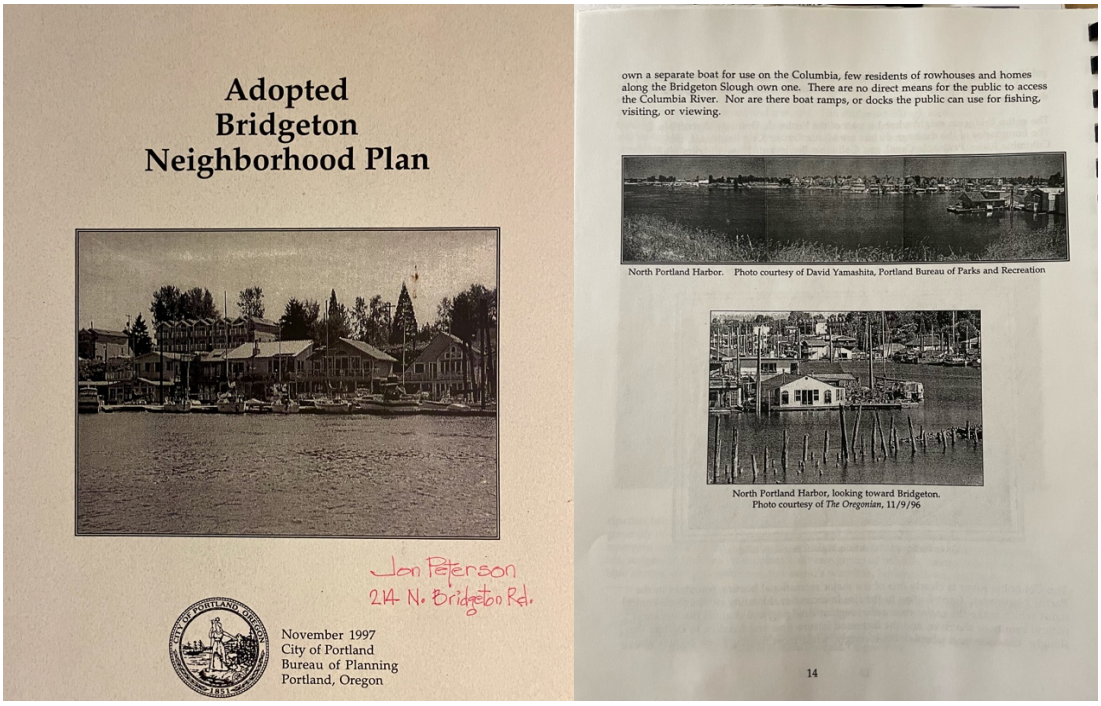
12 November 2024

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

IBR To Include Water Access for Non-Motorized Boats on North Portland Harbor

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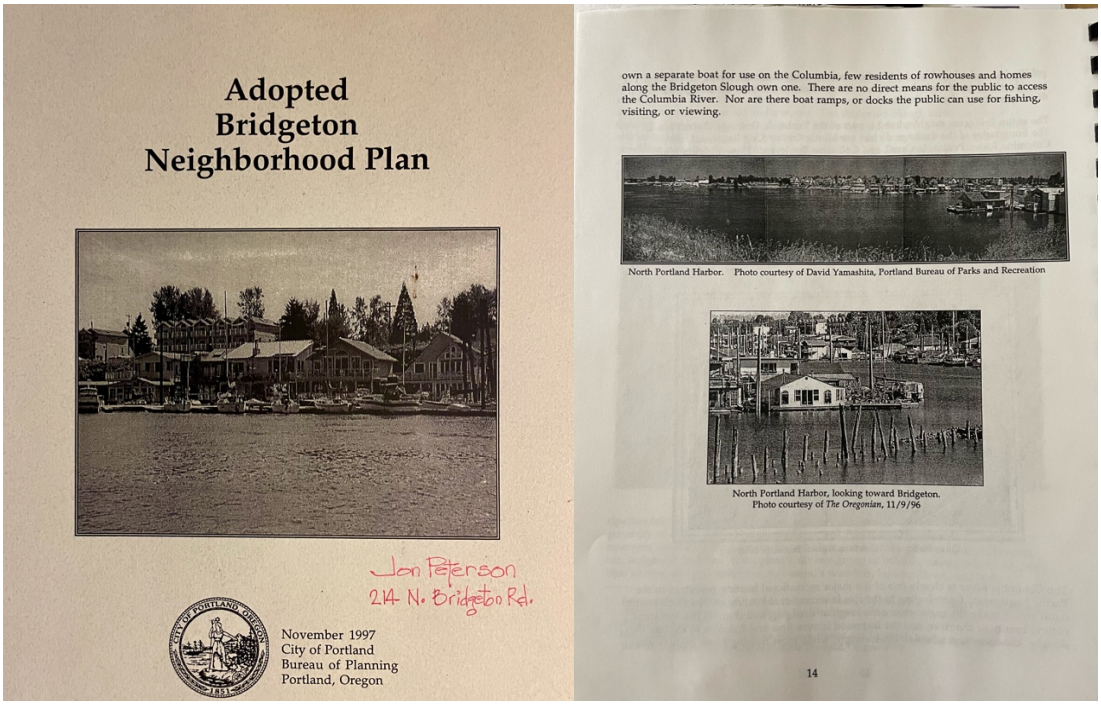

Adopted
Bridgeton
Neighborhood Plan

Jan Peterson
214 N. Bridgeton Rd.

November 1997
City of Portland
Bureau of Planning
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 #3845 DETAIL

First Name :	Caitlin
Last Name :	Reff
Attachments :	DSEIS_3845_City of Portland IBR DSEIS Attachments and cover letter.pdf (1 mb) image001.jpg (23 kb) message24630_1.eml (2 mb)

November 18, 2024

To: Interstate Bridge Replacement Program
draftSEIS@interstatebridge.com
500 Broadway, Suite 200
Vancouver, WA 98660

RE: Interstate Bridge Replacement Program (IBRP) Draft Supplemental Environmental Impact Statement (DSEIS) Public Comment Period

Dear IBRP Administrator Greg Johnson:

Thank you for the opportunity to participate in the Interstate Bridge Replacement Program (IBRP) Draft Supplemental Environmental Impact Statement (DSEIS) public comment period as a participating agency. The city worked within its many bureaus to involve the technical experts necessary to review the analysis compiled in the DSEIS. Our city is committed to making sure climate, equity, safety, and access remain foremost among the goals and needs of the IBRP. This is essential if we are to create an earthquake-resilient bridge that will serve generations to come, improve the movement of goods and services into our region, and better connect people and communities, including those walking, biking, and taking transit.

We recognize and appreciate the work of the IBR program to reach this milestone. We also see significant opportunity for increased partnership, collaboration, and accountability. We must work together to ensure actions align with stated goals and outcomes for people experiencing low incomes, suffering impacts of living adjacent to a freeway, or experiencing racial inequities within our transportation system. We must work together to leverage the opportunities of new connections and new spaces that will be created, ensuring they are designed in a way that centers the quality of experience, communities, and neighborhoods through which I-5 passes. And we must work together to develop and confirm a regional approach to climate impact reduction in support of state-wide Greenhouse Gas (GHG) emissions and vehicle miles traveled (VMT) goals. To do this impactful and necessary work, deep partnership will be needed between public and private sectors and with community organizers and community members. We request that the city's partnership with IBRP and associated work program is defined and agreed upon as the program advances.

Portland City Council adopted the Modified Locally Preferred Alternative (MLPA) in 2022 with a set of Conditions for Approval. Per the adoption of the MLPA, Portland set forth 55 conditions for the program. After review of the DSEIS, the city has identified the need for clarification or additional technical analysis in some areas as we move toward the Final Supplemental Environmental Impact Statement (FSEIS). The topics below highlight general areas of concern and additional asks of IBRP, further elaborated through our detailed comments attached to this letter:

- **Climate.** IBR's commitment to center climate and align with regional policies around reduction of GHG emissions and VMT that meaningfully contribute to the region's climate targets should be explicitly mentioned in the DSEIS. The climate commitment made as part of the MLPA goes further than the climate change impact analysis within the DSEIS and is a critical element of bi-state collaboration going forward. Metro, City of Portland, City of Vancouver, ODOT, WSDOT, and the IBR program have been working to address these climate commitments and we look forward to continuing that parallel process with greater involvement from all relevant parties in earnest as the project progresses.

- **Safety on local streets.** Data provided within the DSEIS indicate there are several segments on Portland's High Crash Network that will experience peak-hour vehicle increases of more than 10%, indicating the potential for significant diversion of traffic to local streets and community impacts to vulnerable neighborhoods, resulting in increases in crash risk. Additional traffic analysis and crash data is needed to sufficiently capture the anticipated traffic changes, particularly at major High Crash Corridor intersections in N/NE Portland, including N/NE Martin Luther King Jr. Blvd, Columbia Blvd, Lombard Street, Union Court, Vancouver Way, and N Victory Blvd. These must be further studied to see if daily volumes also significantly increase, indicating a need for safety mitigation.

- **Tolling.** The MLPA included a commitment to use variable rate tolling for funding, construction, managing congestion, and improving multimodal mobility within the program area. Additional analysis is needed to understand the impact of different rate amounts on demand and potential diversion to the I-205 bridge and East Portland communities. The city expects that changes to toll rates on I-5 would result in meaningful changes to traffic on I-205 and surrounding local streets and this should be analyzed further by the program. This additional analysis and understanding should be used to inform an equitable variable rate tolling approach that supports attractive multimodal transportation options and helps reduce identified traffic impacts in the DSEIS.

- **Active transportation.** Connections to multi-use trails and active transportation connections in the project area need refinement or further analysis to ensure improvements made by the program connect to Portland's existing all-ages and abilities biking and pedestrian networks. For example, the NE Martin Luther King Blvd/Union Court path should connect to the city's network at the intersection of N Vancouver Ave & Schmeer Road. Additionally, noise impacts, air quality impacts, weather impacts, and connections to existing and future facilities should be further analyzed in the FSEIS to inform facility design solutions. Finally, the city requests additional analysis be completed that includes an active transportation connection along the light rail transit bridge between Expo Center and Hayden Island, to create better connections between public transportation and those walking, biking, or rolling along the bridge and adjacent paths or destinations.

1120 SW 5th Avenue, Suite 544
Portland, OR 97204
503-823-1154
Michael.Jordan @portlandoregon.gov
Portland.gov

- **Transit optimization**. We support the expanded and improved public transit options studied within the DSEIS that focus on improving access and making walking, biking, and taking transit more attractive choices. As new services are proposed and public transportation modes optimized (bus, express bus, and light rail), consideration of impacts to changes in existing transit service is needed. This includes a need to conduct robust community engagement to understand the needs of those traveling to/from Hayden Island. If current transit service is changed or eliminated within the study area, those changes need to be studied and documented to better understand commute behavior, origin and destination data, and community impacts, particularly to vulnerable communities.

- **Equity**. Continuing to work toward the commitments adopted as part of the MLPA, further analysis should be conducted to better understand the impacts to vulnerable communities through the Environmental Justice lens in the DSEIS. Analysis on impacts to EJ communities is lacking in the DSEIS, limiting the understanding of potential impacts and the program's ability to adequately develop necessary mitigations that can help protect these communities. As noted within the DEIS, conducting meaningful and robust analysis on Environmental Justice populations is difficult to capture; this barrier underscores the importance of ongoing and intentional community involvement to accurately represent the communities' voices and experiences. Working closely with these communities can also help advance the work of the Community Benefit Agreements Group and the program's Equity Framework.

- **Delta Park.** The proposed reconfiguration of NE Martin Luther King Blvd access ramps listed in the DSEIS would result in indirect routing of freight to destinations around Delta Park and surrounding neighborhoods. A revised option with improved routing for freight away from the park should be advanced, as well as an evaluation of whether anticipated noise impacts, tree impacts, and traffic impacts would constitute a 4(f) constructive use.

- **Public spaces.** As the program advances, the city again requests IBRP develop a public involvement plan to identify the appropriate stakeholder groups and methods of engagement around urban design elements with the design community on both sides of the Columbia River. This process and engagement are needed to establish shared understanding around how the principles, goals, and objectives established by the previous Urban Design Advisory Group will be updated and integrated into IBRP, and how both Portland and Vancouver policy goals around promoting healthy lifestyles and creating active, great places will be achieved. This information may be provided in the anticipated Conceptual Design Report, however that has not yet been provided to project partners for review.

In pursuit of supporting the next phase of the program, we again acknowledge the significance of the regional compromise achieved as part of the MLPA adoption. The endorsed MLPA demonstrates a shared commitment to ensure this program reflects our community's values and stipulates that no more than one auxiliary lane be provided in each direction on I-5 over the Columbia River, and as further reflected in the adopted 2023 Regional Transportation Plan. Any option that proposes additional added vehicular

capacity would threaten bi-state agreements and should not be carried forward into a Preferred Alternative.

Additionally, the bridge configuration options studied have an impact on our ability to meet shared goals. Data provided within the DSEIS indicate the single-level fixed span may provide the greatest benefits with fewer environmental or technical impacts and associated challenges. Should the single-level fixed span configuration be advanced, additional exploration and design process should include, but not be limited to, bridge design type options and urban design opportunities, optimizing ramp geometry and reducing impacts of the bridge's increased vertical grade for all users, innovative design solutions to create safe and comfortable spaces for people walking and biking, and demonstration that the selected bridge configuration option has the least significant detrimental impact to the city's environmental resources.

Letters from advisory committees, including the Bicycle Advisory Committee (BAC), Pedestrian Advisory Committee (PAC), Portland Freight Committee (PFC), and the Design Commission are attached to this letter. While these comments do not represent city policy, they are representative of shared concerns related to pedestrian and bicycle safety and comfort, traffic analysis, urban design, and greenhouse gases.

Our ongoing commitment to address climate reduction targets, improve active transportation facilities on and around the bridge, and promote safe travel through the I-5 corridor for all users is reflected in the City's DSEIS comments. We know that there is still a lot of work ahead to make sure that the program addresses the local needs and impacts within the City of Portland, and that there are still many decisions that need to be worked out through the identification of a Preferred Alternative, publication of the FSEIS, and start of the design phase. We expect that extensive ongoing engagement with the IBR program and project committees, as well as with Metro, TriMet, key stakeholders, and the public, will only continue to strengthen the vision we all see for the IBR program. Engagement from all involved will be required to ensure community commitments are upheld and stakeholder voices are heard, while achieving the technical analysis required to move the project forward.

Sincerely,

Michael Jordan
City Administrator
City of Portland

1120 SW 5th Avenue, Suite 544
Portland, OR 97204
503-823-1154
Michael.Jordan @portlandoregon.gov
Portland.gov

Cc: Priya Dhanapal, Deputy City Administrator, Public Works
Donnie Oliveira, Deputy City Administrator, Community and Economic Development
Sonia Schmanski, Deputy City Administrator, Vibrant Communities
Millicent Williams, Director Bureau of Transportation
Eric Engstrom, Director Bureau of Planning & Sustainability
Adena Long, Director Portland Parks & Recreation
Dawn Uchiyama, Director Bureau of Environmental Services
Edward Campbell, Acting Director Water Bureau
Art Pearce, Deputy Director, PBOT
Caitlin Reff, Major Projects and Transit Division Manager, PBOT
Brenda Martin, IBR Capital Project Manager, PBOT

Attachments: City of Portland staff, technical DSEIS Comment Log
Letter from City of Portland Bicycle Advisory Committee
Letter from City of Portland Pedestrian Advisory Committee
Letter from Portland Freight Committee
Letter from Portland Design Commission

1120 SW 5th Avenue, Suite 544
Portland, OR 97204
503-823-1154
Michael.Jordan @portlandoregon.gov
Portland.gov

CITY OF PORTLAND IBR DRAFT SEIS REVIEW COMMENT TRACKING FORM

Deliverable Name:		**Draft SEIS**	
Comments Due:		**11/18/2024**	

City of Portland Subject Matter Expert Reviewer Comments

City of Portland SME review comments on the DSEIS have been organized around topics within the Portland City Council MLPA endorsement Conditions of Approval dated July 13, 2022 (https://www.portland.gov/council/documents/resolution/adopted/37581), and IBR committments and responses associated (https://www.interstatebridge.org/library).

City of Portland MLPA Conditions of Approval	Comment ID#	Draft SEIS Section	Page #	Figure/ Table	Reviewer Comment
1. Climate and Environment **a) Greehhouse Gas Emissions (target, evaluation, montioring & mitigation)** **b) Sustainable Design** **c) Construction management**	1	3.16	13	Figure 3.16-3	Please update Figure 3.16-3 to show Wetlands Q, R, and V. Specifically, Wetland Q, Wetland R, and Wetland V from map Figure 3.15-2 Field-Identified Wetlands and Other Waters - Oregon are missing from map Figure 3.16-3 Habitat Classifications showing Wetland and Riparian Habitats. Please note, acreage calculations for permanent impacts to wetlands (0.58-acres) and wetland buffer (7.39-acres) match between document 3.15 Wetlands and Other Waters and document 3.16 Ecosystems; therefore, the error appears limited to just the map Figure 3.16-3.
	2	3.15	2	Table 3.15-1	Recommend adding an asterisk to Wetland Fill Acreage 0.58-acres in Table 3.15-1 to highlight that acreage may change based on the wetland and other waters delineation report identified as being developed in 2024 within Section 3.15.2 Existing Conditions paragraph 1.
	3	3.8	6		The smelt species found in the project area is Pacific eulachon. Please delete "smelt."
	4	3.16		3.16-2	Upper Columbia River chinook salmon are federally listed as Endangered, not Threatened.
	5	3.16	21		Add "riverbank" to list of habitat types impacted by the project's physical alteration of landscape.
	6	3.16	22		Add juvenile life stage to both sturgeon species listed as impacted benthically.
	7	3.19	2		" Portland's Climate Emergency Workplan (City of Portland 2022) establishes emission reductions targets with benchmarks at 2030 (50% below 1990 levels) and 2050 (reach net zero)." should be changed to, "Portland's Climate Emergency Declaration (City of Portland 2020) establishes emission reductions targets with benchmarks at 2030 (50% below 1990 levels) and 2050 (reach net zero)."
	8	Climate TR			The City made the prior comment on the 2 Aux Lanes draft TR: "*Acknowledging that the climate analysis has focused mostly on GHG, the growing impervious surface footprint/increases in vmt of the Mod-LPA 2-lane option, especially closer to sensitive land uses, may have urban heat island impacts. If there are no resources to investigate this further, it should be at least mentioned as an outcome for consideration.*" IBR's response was: "*Added broad note to text in this report and SEIS section.*" However, the Draft SEIS doesn't seem to include any acknowledgement of potential urban heat island impacts from the Modified LPA or any of the bridge design or aux lane options. This could be added to the "Two Auxiliary Lanes" section on page 5-10 and in Table 5-4. This could also be added to section 8.2 Partnerships to Address Climate Crisis and Table 8-2.
	9	Environment Justice			The chapter needs additional insight to meet Conditions of Approval 1. Climate and environment. There are no specifics on the mitigation strategies to benefit EJ communities, or a measurable plan to monitor the impacts of GHG and VMT. There is also limited information on the reduction targets. There should additionally, note the plan to monitor the GHGs and VMT through 2050. Additional clarity on accountability measures when mitigation targets aren't met or how they would be offset through other funding/support/etc. are not clearly demonstrated in the chapter. The table on page 24 has that for the Environmental Resource: Air Quality, there is no disproportionately high and adverse effects to EJ populations have been identified, and that there is improved air quality as a benefit for all people. There seems to be a need for the metric that supports this claim included in the table or content.
	10	CH. 2			Chapter 2 of the Draft SEIS should also include the climate commitments that the IBR program made to set and report on a long-term target to reduce greenhouse gas emissions during the adoption of the Modified Locally Preferred Alternative. Chapter 2 should contain language that acknowledges that the MLPA climate commitments deal with a broader scope of emissions than is considered in the Draft SEIS, that the climate analysis in the NEPA document is not directly responsive to these commitments, and that these commitments will be addressed outside of the NEPA
	11	CH. 3			In Chapter 3, the transportation mitigation section should prioritize transit- and tolling-related mitigation before considering additional capacity such as additional auxiliary lanes, per policy MO2.1 of the Oregon Transportation Plan and the 2023 Regional Transportation Plan's Motor Vehicle Policy 5. It should further acknowledge the MLPA commitment to use an adaptive management framework, including tolling, to improve performance relative to the
	12	CH. 3 Environmental Justice			The report outlines several strategies aimed at reducing GHG emissions and VMT, particularly through transportation management measures and active transportation improvements. However, it lacks a detailed plan for monitoring and evaluating progress toward these specific targets. To enhance the effectiveness of these strategies, it would be beneficial to establish clear metrics and timelines for evaluation, ensuring that stakeholders can track progress and make necessary adjustments over time. This gap highlights the need for structured framework that can ensure accountability and transparency in achieving these environmental goals. Moreover, while the report indicates a general trend towards reduced VMT and improved air quality, it lacks specific modeled projections for GHG emissions, VMT, VMT per capita, and model splits for years 2035, 2040, and 2050.
	13	Neighborhoods & Equity 3.5			Recommendations ** 1. Community Engagement: Actively involve community members in decision-making by organizing open meetings and establishing partnerships with local organizations. This approach will help identify and address the community's specific concerns and needs, ensuring that their input shapes the analysis. 2. Diverse Data Sources: Foster a holistic understanding of vulnerabilities by integrating qualitative feedback from community members—such as personal narratives and concerns—with quantitative data derived from scientific studies. This combination will provide a richer, more nuanced perspective on the issues at hand. 3. Intersectional Analysis: Conduct an in-depth examination of how various social factors, including race, income, and other identity markers, intersect to create unique challenges for different groups. This analysis will illuminate the complexities of their experiences and inform targeted interventions. 4. Longitudinal Studies: Implement comprehensive longitudinal studies designed to monitor environmental changes and their long-term impacts. By tracking these developments, researchers can better understand trends and the effectiveness of ongoing efforts to address environmental injustices. 5. Collaboration with Local Organizations: Build strong, collaborative relationships with organizations actively engaged in the communities most affected by environmental issues. These partnerships will provide essential insights and empower community members to take an active role in the EJ analysis and decision-making processes. 6. Regular Updates: Establish a dynamic system for continuous updates to reports and analyses, ensuring they remain relevant and reflective of new data, community feedback, and evolving circumstances. This commitment to regular revisions will help maintain transparency and accountability, fostering trust between researchers and the communities they serve.
	14	Neighborhoods & Equity 3.5			The chapter does an in-depth analysis of equity priority communities, but there is a lack of the specific commitment to toll exemptions specified in Conditions of Approval 2. Equity, Additionally, there are no specifics about measures for meeting outcomes or community benefits. There also could be improvement for showing a summary of the impacts to all the neighborhoods, breaking down the impacts by neighborhood rather than by the technical considerations would help community members better understand the impact to their community rather than the impacts from the overall project. For example, table 3.5-1 could be broken down that way, and then keeps as a summary in the appendix. There seems to be a need of neighborhood based maps to highlight impacts.

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City of Portland MLPA Conditions of Approval	Comment ID#	Draft SEIS Section	Page #	Figure/ Table	Reviewer Comment
2. Equity **a) Low-income toll exemption** **b) Mitigation** **c) Equity Desired Outcomes** **d) Community Benefit Agreement**	15	Ch. 2 Desc of Alternatives			Chapter 2, Description of Alternatives, contains no meaningful comparison of noise impacts to shared use path users between the bridge configuration options (e.g., single-deck, double-deck, etc.). The public should be able to distinguish the audible differences between the bridge options since they are physically different environments. This comment also applies to the Environmental Justice TR. Section 4.2 of the Equity TR (pages 4-6 thru 4-8) does offer a comparison in bridge options on active transportation user experiences and concludes that "*these differences...could adversely affect equity priority communities more than the general population*," but no mitigation is proposed. See Portland Conditions of Approval #2c and #3e. Noise for AT users should be further evaluated to inform design and potential mitigation needs.
	16	Air Quality TR 4.1.2.2	4-7		City's prior comment on Bridge Options Rev B: "*Table 3.1-Air Quality description for shared use path experience was revised for the single level options compared to the MLPA. But the MLPA does not include any description of the shared use path experience compared to the no-build. Please revise Table 3.1 Air Quality to include shared use path experience comparison of MLPA to no-build and shared use path experience comparison of single level options to MLPA.*" This comment is only partial addressed in the Draft SEIS. There is still no comparison to no build for shared use path users. There is only a general comparison between single and double deck for shared use path users. See Portland Conditions of Approval #2c.
	17	Equity TR 4.2; Environmental Justice TR 4.2	4-7		The Equity and Environmental Justice TRs are missing any meaningful comparison of air quality impacts to shared use path users between the bridge types under consideration (e.g., single-deck, double-deck). This section of the Equity TR even concludes with stating equity priority communication could be more affected than the general population, although this is inconsistent with Table 4-2 of the EJ tech report that says "no disproportionately high and adverse effects to EJ populations have been identified." These reports don't include the general comparison from the Air Quality TR. See Portland Conditions of Approval #2c.
	18	Environmental Justice TR 3.20.1.	8	3.20-6	Low income populations were concluded based on regional poverty thresholds. Noting that TriMet and Metro accept the threshold to be 200% of the federal poverty level to reflect regional living costs and standards and that a four-person household was selected as the basis for determining the low-income poverty threshold. Instead of using the regional thresholds to set EJ standards for neighborhoods along the project corridor with substantial disparities, there should be additional study based on Conditions of Approval #2C. There are different levels of impact for different EJ populations along the project area, there also seems to be assessment needed with people living with disabilities. Hayden Island for example has a significant population of people living with disabilities in comparison to the City of Portland. Additionally, there should be additional analysis to identify low-income populations with smaller household sizes as well to identify adverse impacts.
	19	Environmental Justice TR 3.20.		3.20-10	The table does offer meaningful specifics on the relationship between the potential impact to EJ populations and the environmental resource topic. It should be clear where the EJ populations are related to the Environmental Resource topics impacting them, and the identify the groups related to those impacts (minority/low-income, etc.) that would support Conditions of Approval 2B. To identify mitigation for adverse project impacts, that must be proximate to where and in which communities those impacts occur.
	20	Environmental Justice TR 3.20.		3.20-12	The table should be supplemented by a map showing the location of impacts. A more granular assessment that identifies and quantifies specific health or EJ risks, would clarify the adverse effects, to inform more localized mitigation strategies. The analysis lacks details on potential mitigation related to EJ risks and impacts. There is a lack of neighborhood specific assessment related to high impact areas. IBR could also offer some additional transparency on how EJ areas will be prioritized and how the program will respond to to needs of affected communities.
	21	Environmental Justice TR 3.20.			The Environmental Justice TR needs additional clarity on impacts to the IBR study area in comparison to the EJ secondary study area. Most of the maps showing in 3.20.2 Affected Environment have both labels on them, yet none of the demographic tables separate the two. Based on Conditions of Approval 2c. Additionally, improvement is needed in there overall summary of EJ outcomes, there should be additional maps showing which EJ areas see specific EJ impacts and the relationship to the demographics of the community. There should also be clarity on the areas with greater burdens. The content about the EJ impacts and conditions are difficult to digest, there seems to be an overwhelming amount of detail related to the methodology of the evaluation/analysis, processes, and regulations. Some additional headings in each section might help the public digest areas of interest.
	22	Environmental Justice TR 3.20.3.	13		Under the Engagement Activities section there should be details related to the discussion, perception, and how EJ populations have been involved with issues related to EJ. There should also be information related to the degree of involvement of EJ communities.
	23	Environmental Justice TR 3.20.3.			The chapter should include details related to Conditions of Approval 2d Community Benefits Agreement. There is limited information related to the funding or scoping of these agreements or potential goals, to support outcomes for EJ Communities. In addition, there should be some goals clearly defined to address and improve EJ community impacts.
	24	Neighborhoods & Equity 3.5			The mitigation strategies should be specific based on equity priority communities, neighborhood, and construction impacts that are temporary/long-term, there existing strategies are vague. They lack context to areas that would benefit from community benefit agreements, where those benefits are anticipated, the type of commitments that IBR would make. Those details are required to fully meet the condition of approval 2.d. Equity, Community Benefits Agreement.
	25	Equity TR			Section 7 of the Equity TR is still quite vague and non-committal in describing mitigation measures, despite the fact this report concludes there will be long term and temporary impacts to equity priority communities. Of note is the lack of commitment to toll exemptions or variable rate tolls for low-income drivers; instead statements that this will be studied and may be implemented. Although Section 8 does at least acknowledge that these areas are still being analyzed and more details will be known in next steps.
	26				The city requests study of a shared-use path on the west side of I-5 integrated with the light rail transit bridge between the Hayden Island and Expo Center MAX stations to better meet regional and city connectivity standards and provide a convenient active transportation connection between Hayden Island, the Expo Center, and destinations in North Portland. Walking/rolling/riding from Expo to the eastside path and back to west Hayden Island is considerably longer and out of direction. If TriMet truncates bus line 6 at Expo, then a westside shared-use path to Hayden Island will be important for direct and convenient access to bus line 6 between Expo and west Hayden Island during times when light rail service is less frequent, and transfers are less convenient or missed. Active transportation facilities on both the eastside and westside of I-5 connecting Hayden Island/Tomahawk Island Drive to Expo and Delta Park support project goals of climate and equity by providing equitable and robust active transportation options. IBR's Draft SEIS documents do not incorporate a secondary shared use path.
	27	Ch. 2 Desc of Alternatives			In table 3.1, please revise and explain how the bridge options will comply with ORS 814.410. If IBR does not have to comply with ORS 814.410, please explain reasons why. It is understood that active transportation users are not considered noise-sensitive land uses. However, that does not provide justification for not analyzing highway noise impacts on active transportation users. This comment also applies to the Equity and Environmental Justice TRs.

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City of Portland MLPA Conditions of Approval	Comment ID#	Draft SEIS Section	Page #	Figure/ Table	Reviewer Comment
3. Active Transportation **a) Use Local Guidance** **b) Provide Resting Zones** **c) Interchange design** **d) Wayfinding** **e) Limiting Noise** **f) Connections to the Bridge**	28	Environmental Justice TR 4.4.3	4-29 thru 4-31	Table 4-11	The BLTS analysis does not include the existing and proposed shared use paths along I-5 itself, including the existing Interstate Bridge and Portland Harbor bridge crossings or any of the proposed bridges, nor any of the bridge design options. As mentioned in other comments, there is also no meaningful comparison of noise impacts between the bridge design options (single-deck vs double-deck). Such an analysis would be helpful for the City and the public to have a more informed opinion, and in turn give public comments, on preferences for a bridge type (e.g., single vs double-deck).
	29	Transportation TR 7.1.8	7-5		At Marine/MLK/I-5 interchange, no ped crossings of MLK are provided. Resulting increase in crossing gap is an impact that should be mitigated. An alternative design at the interchange that also addresses V/C deficiency could avoid this impact.
	30	Transportation TR 1.1.2	1-13	Fig 1-8	PBOT has concerns with requiring that pedestrians and bicyclists on the east side of MLK cross at Vancouver Way instead of providing a continuous facility along MLK. Vancouver Way has a history of serious injury crashes. Between 2015-2019, Vancouver Way between the northern Reddaway driveway (north of Harney) and Walker Rd experienced (3) serious injury crashes. All (3) were TURN crashes.
	31	Transportation TR 3.8.3.1		Fig 3-44	Figure inaccurately illustrates existing sidewalk facilities on Hayden Island. Many sections of streets within the Jantzen Beach Shopping area have either sidewalk on both sides or at least one side of a street. Please update the figure to accurately illustrate the existing pedestrian network.
	32	Transportation TR 3.8.3.1		Fig 3-47	There does not appear to be an existing MUP on N Jantzen St under the existing I-5 bridge as illustrated. Please update the figure to accurately illustrate the existing active transportation network.
	33	Transportation TR 3.8.4	3-111		"The impedances were derived from Table 3 of the report but adjusted based on project goals, existing behavior change literature, and the IBR team's experience on other projects." Please expand on how they were adjusted and what justifications were used, whether from research (include that research in an appendix), personal experience (elaborate on this personal experience), or project goals (elaborate on these goals).
	34	4.8.2.4	4-53		Active transportation improvements along Expo Rd will affect Victory Blvd by attracting additional active transportation trips traveling to/from destinations east of I-5. As illustrated in Fig 3-44 and 3-48, Victory Blvd does not have a complete ped or bike network. Victory Blvd also has a history of pedestrian crashes. IBR should infill the sidewalk network on Victory Blvd and consider a bike facility connection on Victory Blvd.
	35	Transportation TR 4.9.2.2	4-160		What data supports the conclusion that active transportation safety conditions are improved via the double-deck configuration?
	36	3.1.2	3.1-3	3.1-1	Identify existing conditions not just by the presence of "Bicycle Facilities" and "Pedestrian Facilities" but by whether existing facilities meet current guidance. Neither the bicycle facilities on MLK Jr. Boulevard nor those on the Interstate Bridge meet any involved agency's guidance. Fine to list that they exist, but acknowledge that they are sub-standard by current guidance. This is especially needed given that the next section describing traffic operations on the bridge discusses design and operational deficiencies with the auto system. See especially Tables 3.1-5 and 3.1-6 about I-5 performance. Comparable mention for the sufficiency of the active transportation facilities seems merited.
	37	3.1.2	3.1-16		Under Active Transportation more fully discuss the sufficiency of the facilities relative to agency guidance. This would be similar to the treatment for intersections discussed with Table 3.1-7 where it was noted that "four intersections in the study area do not meet the applicable agency performance standards". Identify <u>all</u> active transportation facilities in the study area that do not meet agency design guidance. In particular, the bike lanes on MLK meet neither ODOT's nor PBOT's current guidance.
	38	3.11.2	3.11-11		Existing traffic noise levels did not seem to be modeled at the path. FHWA considers trails to be in Activity Category C in regard to noise; abatement measures are triggered in this category at dBA of 67. Cannot determine what to do if not measured / modeled.
	39	3.11.3	3.11-13-14		<u>No consideration of noise impacts on trail on bridge. Isn't trail considered for noise under FHWA guidance?</u>
	40	Environmental Justice			On page 27, the table combines all transportation related Environment Resources together, the impact summary should be tailored specifically on EJ populations. Information in that row should be potentially broken down by transportation mode. The table overall also has several inconsistencies in how it is filled out for example, the Air Quality row comments for Impact Specific to Minority and Low-Income Populations has a full sentence response, while other rows (Noise and Vibration/Visual Resources) put "none" under the Benefit Specific to Minority and Low-Income Population". In addition, there should be a greater connect to how the "benefits" are coordinated with related agency efforts on transit/active transportation network/improvements. Even though disproportionately/adverse impacts are called out, the content does not include if there are any mitigation strategies, or how they measured those outcomes, it does not include any details on opportunities for how EJ community would be integrated in the process. An overview of specific impacts that are neighborhood based would help identify those most burdened.
	41	Neighborhoods & Equity 3.5			The chapter does not call out of the improvements that improve the quality of the existing connections, the information is extremely vague and not specific to any neighborhood context. There also seems to be a lack of the details for different equity considerations for active transportation users, or any major changes like the new interchange designs (Marine Drive/MLK, and the neighborhoods/equity implications. The content on page 22 related to active transportation is centered on the bridge configurations. There should be specific neighborhood/equity details related to noise reduction, rest zones, and connections.
	42	3.1	47		Active Transportation facilities temporarily rerouted during construction need to include accessibility improvements and accessible wayfinding that is appropriately placed and maintained.
	43	4.2.2.5	4-27		The visual quality analysis of the single-level bridge configurations in Section 4.2.2.5 Design Options is lacking a consideration for walking, bicycling, rolling, and other viewers on the shared use path as was done for the two aux lane option. It is expected that views (among other impacts) will be considerably different for shared use path viewers between double-level and single-level bridge options.
	44	Noise and Vibration TR 4.1.2 and 4.6.2.2			The City's prior comment on Rev B of the Noise and Vibration TR; "*The Hayden Island transit station will be adjacent to MLPA I-5 and will be a noisy environment for transit users waiting on the platform for the train. City will be looking for mitigation for the noise impacts from immediately adjacent I-5 road noise consistent with objectives of the 2009 Hayden Island Plan and in collaboration with City of Portland staff. Please provide information on how transit users will be impacted by road noise and how the noise impacts will be mitigated.*" Section 4.1.2, Modified LPA Traffic Noise, and Section 4.6.2.2, Portland Transit Station Noise, still do not consider noise impacts from highway noise on transit users and no mitigations are proposed. The analysis is limited to noise-sensitive existing land uses near the I-5 infrastructure and light rail stations.
	45	Chapter 3, Section 3.1, sub-section "Transit in 2045"	page 3.1 – 35		Please list the proposed bus line 6 route and terminus change, and any other proposed route change for TriMet or C-TRAN in Chapter 3. They should be stated in the Chapter 3, Section 3.1, sub-section "Transit in 2045," starting on page 3.1 – 35. As it reads now, one could read this and think no bus route changes are proposed. It is otherwise buried in the appendix. It is not referenced in the Chapter 3, the document more people may review IBR Draft SEIS Chapter 3.1 – Transportation It is referenced on Page 1-50 of the September 2024 IBR Draft SEIS Transportation Technical Report and listed in Table 1-3. Proposed TriMet and C-TRAN Bus Route Changes. This is page 70 of the 1121 page report.

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4. Transit **a) Future Extension** **b) Funding** **c) Station Location and Design** **d) No Transit Rider Left Behind** **e) System Capacity Analysis and Improvements**	46	Chapter 3, Section 3.1, sub-section "Transit in 2045." And Chapter 7, Section 7.1.7 Transit, on page 7-5	page 3.1 – 35 and page 7-5		The current language on Chapter 3 page 3.1 – 35 appears to imply that there are not route changes to Bus line 6 assumed in the regional model or analyzed. This text: "For the purposes of this analysis, it is assumed the transit networks and service assumptions—except for those that are components of the IBR Program, including new LRT service and more frequent higher capacity express bus service on I-5—are the same for both the No-Build Alternative and Modified LPA." Is that the case? If it was analyzed, please provide more detail about the bus line 6 routing, terminus and frequency are coded into the regional model TNET. If it was not analyzed, how can it be concluded that there is no impact from this change in Chapter 7 Section 7.1.7 Transit, on page 7-5 (also page 408 of the PDF)? Particularly so for people traveling to and from Hayden Island and the MLK corridor. This change would introduce a new transfer between MAX Yellow Line and Bus line 6 to reach the MLK corridor. This likely adds travel time and reduces transit access for EJ communities, including residents of the manufactured homes on Hayden Island. We recommend additional analysis of the proposed TriMet bus line 6 route and terminus change to understand the impact on transit travel times and transit access. We would be happy to discuss what type and level of analysis would be
	47	Chapter 3, Section 3.6.1, sub-section "Temporary Effects" and Chapter 7, Section 7.2.5 Transit, on page 7-6	page 3.1 – 54 and page 7-6		Transit Operations: To further minimize temporary impacts on transit delay and reliability during construction, include implementing temporary transit priority treatments in the options for mitigation. These could also have TDM benefit during construction by encouraging people to ride transit instead of driving. Temporary transit priority treatments could range from NexGen Transit Signal Priority, to bus queue jumps at ramp terminals, bus on shoulder, peak-hour/pro-time BAT lanes on arterials and local streets, and more.
	48	Chapter 7, Section 7.2.5 Transit, on page 7-6	page 7-6		Transit Operations: Add reference to the need for some temporary bus stops when bus routes are detoured during construction. Temporary bus stops may require improvements to make them ADA accessible.
	49	Transportation TR 1.1.2.2	1-20		This section is missing discussion about impacts to the bus network.
	50	Transportation TR 3.7.4	3-89	Tbl 3-28	This table does not account for Line 6. Though it does not cross the entire Columbia River, it crosses the southern half.
	51	Transportation TR 4.7.1.3	4-108		Please quantify the impact of truncating Route 6 at the Expo Center, requiring Route 6 riders destined for Jantzen Beach to transfer to the Yellow Line.
5. Local Street Connections **a) New Connections** **b) Interchange Area Management Plan streets**	52	Neighborhoods & Equity 3.5			The chapter does not specify any equity or neighborhood impacts related to Local Street Connections. There should be specific information about new connections on Tomahawk Island Drive and Hayden Island Drive the impact that has for community cohesion. There is really no mention about other new connections in the Marine Drive Interchange area, such as N Pier 99th St, Expo Road, or Vancouver Way. Or mitigation strategies to support equitable design of new connections. There is also a lack of context related to existing conditions related to local streets.
6. Local Street Impacts **a) Traffic Impact Study** **b) Avoiding Impact and Mitigation**	53	Transportation TR 3.9.1.1	3-119		N Columbia & MLK has a serious crash history and appears to see increased traffic volumes and crashes associated with the Build scenarios. Project should note impact and potential mitigations.
	54	Transportation TR 3.9.1.1	3-119		Safety analysis should look at full project area, not just traffic analysis intersections. For example, two fatal crashes occurring on MLK within the project area are not captured by the analysis. Other Serious crashes are also not captured.
	55	Transportation TR 4.2.3, AppB	4-8, AppB	4-4, AppB	Seven segments on City of Portland High Crash Network see peak-hour increases of more than 10%, indicating potential for significant increase in crash risk. These must be further studied to see if daily volumes also significantly increase, indicating a need for safety mitigation. These segments are Lombard west of Interstate, Columbia east of I-5, Columbia east of 99E/MLK, 99E/MLK (all three screenlines), and Sandy north of Prescott.
	56	Transportation TR 7.1.9	7-5		City of Portland needs additional information regarding potential impacts to roadway segments with significant increases to determine whether safety or other mitigations are needed on those corridors (see comment on section 4.2.3). Based on the peak-hour diversion analysis, it appears that a number of local roadways experience impacts of significant increases in traffic.
	57	EIS 3.1.6	3.1-52		Section notes potential mitigation measures for traffic operations on local streets but not safety impacts. Safety should also be noted.
	58	Transportation TR 1.1	1-4		PBOT has concerns with truck traffic adjacent to Delta Park, crash risk on MLK, and directness of freight routing challenges associated with the MLK on-off concept in the current Modified LPA. PBOT believes there's a workable solution similar to concepts 3 & 4, as previously noted.
	59	Transportation TR 1.1.2.3	1-20		MAX tracks are described as crossing the proposed Expo Road local street extension and the 40-Mile Loop Trail at grade, however, subsequent anticipated delays to these at grade connections is not described later in the report. Provide anticipated delays and queues for these facilities impacted by the at-grade crossings.
	60	Transportation TR 3.6.4.4	3-73	Tbl 3-24	Fig 3-20 appears to indicate that both intersections 69 & 71 will be impacted by freeway congestion in the PM peak period. Please add an "a" footnote as appropriate.
	61	Transportation TR 3.8	3-92		PBOT has concerns with IBR's impact to MLK and subsequent need for mitigation via improved active transportation connections. COP disagrees with the exclusion of Union Ct btwn Hayden Meadows Dr and MLK, MLK btwn the proposed active transportation connection north of Union Ct to Vancouver Ave, and Vancouver Ave from MLK to Schmeer Rd, from the travel shed. Between 2013-2022, there were (4) fatality and (4) serious injury crashes on MLK between Union Ct and Vancouver Way. (2) fatality crashes occurred at MLK/Union Ct and (2) occurred at MLK/Vancouver Way Ramp. (1) serious injury crash occurred at MLK/Vancouver Way Ramp and (3) occurred at MLK/Gertz. There were (4) crashes associated with active transportation: (1) pedestrian fatality, (1) bicyclist fatality, (1) pedestrian serious injury, and (1) bicyclist minor injury. Table 4-7 anticipates that 2045 Modified LPA and Options conditions will quadruple active transportation users across the I-5 Columbia River Bridges, subsequently increasing crash risk on MLK. Mitigation could include one of two options: (1)Extend the proposed shared use path on Union Ct to the south via a protected shared use path on the west side of Union Ct to MLK to Gertz to Vancouver Ave, connecting at Schmeer. (2)Provide a shared used path on N Denver Ave to the west through Portland Parks ROW to N Whitaker (shared use path or sidewalk) to Schmeer (infill – some existing shared use path on south side), connecting to Vancouver Ave.
	62	Transportation TR App G		Tbl 3-37	ID 63/ Marine Dr/MLK Blvd and I-5 NB/SB on-/off-ramps: COP crash data btwn 2015-2019 indicates that a Serious Injury crash is missing from this table. This crash occurred on 8/20/2015, was a FIX OBJ crash, and listed causes were RECKLESS, TOO-FAST. Please adjust table to include this crash data.
	63	Transportation TR App G		Tbl 3-37	ID 63/ Marine Dr/MLK Blvd and I-5 NB/SB on-/off-ramps: COP crash data btwn 2015-2019 indicates (2) Pedestrian crashes - one is missing from the table. One crash occurred on 01/30/2016, was a Minor Injury crash, and listed cause was IN RDWY, NT VISBL. Another crash occurred on 11/4/2016, was a Possible Injury crash, and listed cause was NO-YIELD, NT VISBL. Please adjust table to include which of these two crashes is missing.
	64	Transportation TR App G		Tbl 3-37	ID 69/ Victory Blvd and I-5 NB off-ramp/Whitaker Rd: COP crash data btwn 2015-2019 indicates that (1) Pedestrian crash is missing from the table. This crash occurred on 12/12/2019, was a Minor Injury crash, and listed cause was NT VISBL, IN RDWY. Please adjust table to include this crash data.
	65	Transportation TR App G		Tbl 3-37	ID 73/ Columbia Blvd and MLK Blvd: COP crash data btwn 2015-2019 indicates (2) Pedestrian crashes - one is missing from the table. One crash occurred on 02/02/2017, was a Possible Injury crash, and listed cause was NO-YIELD. Another crash occurred on 11/2/2018, was a Minor Injury crash, and listed cause was IMP-OVER, F AVOID. Please adjust table to include which of these two crashes is missing.

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City of Portland MLPA Conditions of Approval	Comment ID#	Draft SEIS Section	Page #	Figure/ Table	Reviewer Comment
7. Freight Movement **a) Freight Priority** **b) Demand Management**	66	Economics TR 4.3.1.4	4-4		Section 4.3.1.4, Changes in Travel Patterns, states: "*Under the Modified LPA, intersection operations at the I-5 interchange with Marine Drive would be worse compared to the No-Build Alternative for both the AM and PM peak periods. This would indicate a reduction in mobility and access to this freight and employment corridor.*" Readers are then referred to the Transportation TR for more detailed info. Worsened operations at the I-5/Marine Drive intersection would seem to significantly undercut IBR's other statements and conclusions in this report and other reports about IBR benefitting freight mobility (such as page 4-13 "*The project would support this growth by reducing the roadway congestion experienced by freight and other vehicles going to and from the two cities.*"; page 4-14 "*The Modified LPA would benefit the trucking industry by reducing travel times and increasing reliability, which in turn would reduce costs and improve efficiency for truck freight operators.*"; and on page 7-1 "*The Modified LPA would provide positive economic impacts in the study area by reducing congestion on I-5 and facilitating the movement of traffic, particularly freight truck traffic between the Marine Drive corridor and I-5.*"). No mitigations are proposed for the impact of worsened intersection operations at I-5/Marine Drive."
	67	Transportation TR 4.6.4.4	4-95		Page 4-95 states "*Intersection #68 [*Marine Drive/Martin Luther King Jr. Boulevard and I-5 northbound/southbound on-/off-ramps*] would fail to meet the AM and PM peak performance standards under the Modified LPA and would also not operate satisfactorily under the No-Build Alternative. The Modified LPA would introduce a SPUI for the Marine Drive intersection which would combine the previous Marine Drive and Union Court northbound off-ramps into a single off-ramp. A high increase in the number of trips for the southbound off-ramp would also contribute to higher delays.*" Section 7.1.4 says freight mitigation would not be required beyond what is identified in other sections, but the other sections don't definitively state any mitigation will be implemented. However, the report does state this is still being studied and mitigations will be proposed later.
8. Highway and Bridge Facility size, height and footprint **a) One Auxiliary Lane** **b) Minimize Shoulders** **c) No Restriping or Lane Reallocation for Capacity Expansion** **d) Minimize Fixed-span Bridge Height** **e) Study a Lower Bridge** **f) Hayden Island Interchange** **g) Disruptions and Displacements**	68	Transportation TR 4.3.3.1	4-13		EIS Table 3.1-11 and TTR Table 4-5 show I-205 volumes going down with the Build scenario. This is described in the TTR 4.11 and EIS chapter 3.1.3 but is counter-intuitive and warrants more investigation. We need more information including travel demand model outputs to fully understand this finding.
	69	Transportation TR 4.6.4.4	4-32&33		MLK/Marine/I-5 ramp terminals are now 1.07/0.96 (AM/PM) while in last version of TTR they were ICU 0.83/0.76. This appears to be unrealistically high.
	70	Transportation TR 7.1.3	7-2		PBOT disagrees with the project defining operation that is improved from No Build but still exceeds the HDM V/C ratio as an impact. We believe this is an inconsistent use of the term impact under NEPA.
	71	Transportation TR 4.3	4-11 to 4-5		Assumption that Two Auxiliary Lanes do not attract additional traffic does not appear to be plausible and is not sufficiently explained. The use of lower volumes would result in artificially optimistic conclusions for the Two Auxiliary Lane option. If this option is to be advanced then it should have a full analysis as a standalone option with real volumes developed through modeling. Findings for the Two Auxiliary Lane appear to be unrealistically optimistic as a result.
	72	Appendix D & Chapter 2, Design Alternatives			As part of the City of Portland land use process, an application for an Environmental Review must include an alternatives analysis. This analysis is required by the approval criteria and should consider alternative bridge layouts and designs and construction methods and evaluate each alternative on the basis of its impact(s) on City-identified resources and functional values—especially aquatic and terrestrial ecosystems. It must be demonstrated that the selected alternative is the least detrimental to City-identified resources and functional values out of all other significantly different and practicable alternatives. Per Title 33, practicable is defined as “capable of being done after taking into consideration cost, existing technology, and logistics in light of overall project purpose.” It appears from the analysis provided that the double-decked fixed-span alternative has the least impacts to City-identified resources, but it is understood this may not be the preferred alternative for other reasons. If this is the case, your Environmental Review application will need to explain why alternatives with less impacts are not practicable and therefore were not chosen as the preferred alternative.
	73	Neighborhoods and Populations TR	6-1		Appreciate that Chapter 6, Indirect Effects, of the Neighborhoods and Populations TR addresses the impacts of I-5 infrastructure itself on Hayden Island neighborhood cohesion. Chapter 6 discusses potential indirect effects of the Modified LPA resulting from land uses, redevelopment projects, and transit oriented development that could happen. However, some of the impacts described from the expansion of I-5 (e.g. increased congestion, noise, air pollution, larger [taller, wider] physical size of I-5) that would negatively impact neighborhood cohesion are direct effects, not indirect. The proposed expansion of I-5 (vertically and horizontally) would have direct effects on the Oregon neighborhoods, especially Hayden Island, both during construction and long-term. Suggest moving this discussion to Chapter 4, Long-Term Benefits and Effects, and 5, Temporary Effects -- which would help balance out the descriptions of aspects of the Modified LPA that would help offset these impacts and benefit the neighborhoods.
	74	Neighborhoods and Populations TR	7-1 thru 7-2		Despite the long-term, temporary, and indirect impacts identified in Chapters 4, 5, and 6, the discussion of Mitigations for Adverse Effects in Chapter 7 provides no tangible or definitive program-specific mitigations. This technical report does a better job of acknowledging the long-term impacts and the temporary (10-15 years) construction impacts than some of the other technical reports--such as Air Quality, Equity, and Environmental Justice--yet no meaningful or substantive program-specific mitigations are offered, especially for long-term effects. Section 7.1.2 says "The Modified LPA is anticipated to have an overall neutral effect on visual quality in study area neighborhoods," which contradicts the long-term and temporary construction impacts identified in Chapters 4, 5, and 6 (e.g., in Section 4.3.3 "Hayden Island would have high-level visual impacts...".
	75	Neighborhoods and Populations TR 2.4.2	2-6 thru 2-7		Section 2.4.2 Local [Relevant Laws and Regulations] should include a reference to the City of Portland's 2035 Comprehensive Plan as amended through May 2023, which contains many goals and policies relevant to neighborhood livability and cohesion. https://efiles.portlandoregon.gov/record/16339697

CITY OF PORTLAND IBR DRAFT SEIS REVIEW COMMENT TRACKING FORM

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9. Process and Community Engagement **a) Conditions of Approval** **b) Portland Future Involvement** **c) Committee Engagement** **d) Public Engagement** **e) Urban Design Advisory Group** **f) Program Accountability**	76	Community Engagement Report			Recommendations for Community Engagement •Enhance Youth Involvement: Develop targeted outreach strategies to engage younger community members. This could include partnerships with schools and youth organizations to ensure their voices are represented in the planning process, addressing the current shortfall in youth participation. •Facilitate In-Depth Design Discussions: Organize focused workshops that allow community members to explore specific design options in depth. This would help address concerns about design details and ensure that participants have the opportunity to discuss and understand the implications of various choices. •Provide Comprehensive Data: Ensure all relevant traffic and environmental data are readily available and presented in an understandable format. This will empower community members to provide informed feedback and address requests for more detailed information. •Language Accessibility: Increase efforts to provide materials in multiple languages and consider hosting bilingual sessions. This will help overcome language barriers and ensure that non-English speakers can fully engage in the process. •Balance Diverse Priorities: Create forums for dialogue between stakeholders from Oregon and Washington to discuss differing priorities regarding environmental impacts and travel times. This could help reconcile these views and foster a more collaborative approach to decision-making. •Structured Feedback Sessions: Implement structured feedback sessions that focus on specific topics or concerns raised by the community. This will allow for more meaningful discussions and ensure that participants feel their input is valued and considered. •Sustained Engagement Efforts: Develop a long-term engagement strategy that includes regular updates and opportunities for community input throughout the project lifecycle. This will help maintain stakeholders' interest and participation over time.
	77	Equity TR; Environmental Justice TR			City Condition of Approval #9f states: "Program Accountability: Implement an accountability tracking tool that will include regular staff reports to the program and the EAG regarding how the Equity Framework (and equity more broadly) has shaped decisions and activities." It would be helpful to mention any accountability tracking tool or effort in the Equity or Environmental Justice technical reports.
	78	Neighborhood and Equity			The chapter lacks depth or details related to process of community engagement tied to equity considerations. The public engagement activities does not provide insight on priority communities involved in the process, the equity considerations for engaging those stakeholders, there is also a lack of clarity related to the types of decisions or collaboration required with community. There is also details needed related to the equity framework or implementation of accountability tracking.
10. Urban Design of Infrastructure and landside Improvements **a) Urban Design Guidelines** **b) Engage the Community** **c) Under-bridge Activation**	79	global	global	global	Please provide detail on how past efforts and work from the Urban Design Advisory Group (CRC) will be updated for IBR and how urban design professionals will be engaged going forward.
	80	Visual Quality TR 4.2.1.3	4-7	Fig. 4-1	Figure 4-1 KVP 2 simulation at Marine Drive Looking Northwest at Pedestrian Trails shows solid fill under I-5 where it should show elevated structure – this needs to be revised. [On page 4-6 under Cultural Environment, the report says "*The new ramp from I-5 to Martin Luther King Jr. Boulevard would be several feet higher than the existing ramp, which would make it more visible from a few locations in Delta Park. A retaining wall would be required in the corner of Delta Park, introducing a new visual feature. Sensitive recreational viewers would be exposed to new retaining walls, but retaining walls and other similar elements are common in the existing visual context.*" Note that the IBR visualizations (see videos at interstatebridge.org/next steps) also show solid fill/structure under the roadways and interchanges at I-5 and Marine Drive. Is the City opposed to fill walls at this location? We may want to edit this comment with a stronger statement of what we want IBR to revise.]
	81	Visual Quality TR 2.2.4	2-6		Appreciate the Hayden Island Plan being included in Table 3-1 as part of the relevant laws and regulations. However, the reference to the Hayden Island Plan is still missing from Section 2.2.4 that lists the local regulatory context for the visual quality analysis.
	82	Visual Quality TR 3.1.3.2	3-6	Figure 3-2	Figure 3-2, the map of Key Viewpoints Used in the Visual Quality Analysis, shows the existing I-5 configuration. It would be helpful to also see a version of this map with the Modified LPA configuration and its design options shown, to get a better sense of where the KVPs are in relation to the future conditions.
	83	Visual Quality TR 4.2.2.3	4-19 thru 4-21	Figures 4-5 and 4-6	Figures 4-5 and 4-6 for KVP 9 and 10 appears to show I-5 on structure with no fill or fill walls between N Hayden Island Drive and N Tomahawk Island Drive. However, other IBR materials such as the online visualizations (see videos at interstatebridge.org/next steps) appear to show solid fill/fill wall structures under I-5 between these same streets on Hayden Island. Which is the correct structure?
	84	Visual Quality TR 7	7-1 thru 7-4		The program-specific mitigations for long-term effects lack specificity. The mitigations also lack clarity as to whether they will incorporate any City conditions of approval of the Modified LPA related to urban design and light rail station design, or Hayden Island Plan preferences for highway or transit station design. "Bridgehead character" is mentioned here, but not anywhere else in this report, and is not explained further. No mitigations are proposed for the adverse impacts to viewers in KVP 1 at East Delta Park. Conducting public design charrettes should be expanded beyond just transit stations and park and rides, and include all physical IBR Program elements to constructed in the built environment.
	85	Neighborhood and Equity			The chapter notes details related to community cohesion but, there area limited details related on how design and aesthetics will effect equity priority communities related to urban design/landside improvements. Details on mitigation strategies that would benefit communities and the anticipated improvements for the project area that are important equity considerations such as under-bridge activation should be included in the chapter.

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City of Portland MLPA Conditions of Approval	Comment ID#	Draft SEIS Section	Page #	Figure/ Table	Reviewer Comment
12. Equitably designed variable-priced tolling **a) Use of Revenue** **b) Pricing Options for Equitable Mobility** **c) Regional Mobility Pricing Project**	86				Tolling is likely to impose significant financial challenges on low-income households, necessitating targeted mitigation efforts to alleviate these burdens and promote equitable access to transportation. Increased Transportation Costs: Tolling is expected to increase household transportation costs for low-income households significantly. Under the Modified LPA, these households could see their transportation costs rise from 29% to 35% of their total household income, which is a substantial increase. Disproportionate Effects: The tolling program will most adversely affect households at or below the federal poverty level. This demographic is projected to experience a disproportionately high impact compared to the general population, as they already allocate a larger portion of their income to transportation expenses. Comparative Cost Analysis: The analysis indicates that the proportion of income spent on tolls for low-income households will be higher than for median-income households. For instance, while median-income households may see a modest increase in transportation costs (2% to 3%), low-income families will face a more severe financial burden. Overall Impact on Quality of Life: The increased costs associated with tolling could lead to broader implications for low-income households, potentially affecting their mobility, access to jobs, and overall quality of life. The report emphasizes the need for careful consideration of these impacts to ensure equitable transportation solutions. Recommendations: Provide Multiple Payment Options: Offering various payment methods, including electronic toll collection, mobile apps, and cash options, can enhance convenience for communities. This flexibility allows users to choose the payment method that best suits their needs, making the tolling process smoother and more accessible. Invest in Public Transportation Alternatives: To reduce reliance on toll roads, it is essential to invest in and promote public transportation options. Communities benefit from improved transit services that provide reliable alternatives to driving, especially for those who may be financially impacted by tolls. This aligns with the community's desire for integrated transportation solutions.
	87				Additional Recommendations: Implementing Fair and Inclusive Tolling Policies: There is a growing demand among consumers for tolling policies that consider the financial realities faced by different income groups. Advocates suggest the introduction of tiered toll rates that adjust according to income levels, allowing those with lower incomes to pay less while ensuring that higher earners contribute more. In addition, providing discounts to low-income commuters could alleviate some of the financial strain associated with tolls. The Equity Advisory Group strongly underscores the necessity of executing these policies in an equitable manner, as it is crucial to prevent tolling practices from disproportionately impacting vulnerable populations. This approach not only fosters fairness but also promotes access and mobility for all community members. Enhance Communication and Transparency: Clear communication about toll rates is essential. This information should be provided in multiple languages and through culturally relevant channels and include details on payment methods and the reasons behind tolling decisions. It's important for communities to understand how and when tolling will be implemented and how revenues will be used. Being transparent about these matters can help build trust and acceptance among users. Conduct Regular Impact Assessments: Regular assessments of the tolling system's impact on traffic patterns, congestion, and community well-being can help identify areas for improvement. Consumers should be involved in these assessments to ensure their concerns and experiences are considered in future tolling decisions. Create Feedback Channels: Establishing channels for consumer feedback on tolling experiences can help agencies understand public sentiment and make necessary adjustments. This could include public forums and collaboration with community partners to conduct targeted outreach where users can share their thoughts and suggestions regarding tolling policies and practices.
	88				Please reference City of Portland Pricing Options for Equitable Mobility (POEM) Task Force recommendations and ODOT's Equity and Mobility Advisory Committee (EMAC) recommendations for policy and strategy considerations to advance equity and environmental outcomes through pricing.
	89	Neighborhood & Equity			The chapter falls shorts on meeting Portland's conditions of approval and IBR commitments on equity. The content on tolling on page 26 note that there is a burden for low-income travelers. But, there is no detail on anticipated amount of impact. Or mitigation strategies, there should be specifics on pricing options for equitable mobility, goals, and potential off-set strategies. There should also be a note on mobility and climate outcomes, potential exceptions, and the impact of design to achieve the most equitable outcomes. There should also be details related on reducing barriers.
	90	global			All references to City of Portland 2035 Comprehensive Plan should be updated to refer to the "as amended through May 2023" version. https://efiles.portlandoregon.gov/record/16339697
	91	Land Use TR 2.3.7	2-7 thru 2-8	Figure 3-12	The list of comprehensive plan and zoning designations still does not state that it only includes the primary study area. The text refers to Figure 3-12, which shows both the primary and secondary study areas. If the list is supposed to include the secondary study area, then there are many comprehensive plan designations, zones, overlays, plan districts, and other areas missing from the list. Please clarify if the list includes the primary or secondary study area, or both, and update the list as needed.
	92	Land Use TR; Hazardous Materials TR	3-4; 3-2	Figure 3-3; Figure 3-1	This comment applies to the existing land use maps in the Land Use Technical Report on page 3-4 in Figure 3-3 and the Hazardous Materials Technical Report on page 3-2 in Figure 3-1. It appears that the symbols for two or more land uses overlap in some places, creating a color that doesn't appear in the legend. This happens mainly around Hayden Island where water uses are indicated and overlap with vacant land, single-family residential uses, or the river. The overlaps make it difficult to tell which existing land uses are indicated on the map. Please revise to avoid the overlapping colors.
	93	Land Use TR	9-2 thru 9-3		The last text at the bottom of page 9-2 appears to be the end of a paragraph. The beginning text on page 9-3 appears to be either an incomplete sentence or isn't capitalized. As such, it's unclear if any text is missing or this is just a type. Please check and correct.
	94	Aviation TR; Cumulative Effects TR	global	global	For awareness coordination purposes, the Port of Portland has begun the process of updating the PDX Airport Master Plan. The project is called PDX 2045. The project began in 2023 and will take about 3 years to complete, well within the timespan of the IBR Program. More info at pdx2045.org. Suggest, at minimum, adding a reference to this in the Aviation and Cumulative Effects TRs and summary findings sections of the SEIS.
	95	global			Staff for the Historic Landmarks Commission: The HLC has no comments at this time, and looking forward to the future required Type 4 Land Use Demolition Review for Demolition of the 1917 Bridge [Type 4 Demolition Review is reviewed by the Historic Landmarks Commission and Portland City Council is the approval body].

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OTHER / GENERAL	96	Chapter 3.07 - Parks and Recreation and Chapter 4 - Section 4(f) Evaluation	general		A Non-Parks Use Permit (NPUP) will be required for all work on PP&R-managed property. The NPUP will specify dates of work and other conditions necessary for park occupancy, including mitigation for any impacts. A Tree Removal Permit issued by PP&R's Urban Forestry division will be required for any trees proposed to be removed. If any work is proposed near trees, Urban Forestry will require tree protection pursuant to City Title 11.
	97	Chapter 3.07 - Parks and Recreation	3.7-14		The proposed impacts at East Delta Park would result in the closure of the existing off-leash dog area (DOLA). Although this DOLA is currently closed for maintenance, the impacts of its closure should be noted in the report. PP&R's level of service for DOLAs is 2 miles. It appears removing this DOLA from service would reduce the number of households adequately served by DOLAs in the City of Portland - this impact to service levels in the City should be noted here.
	98	Chapter 3.11 - Noise and Vibration		Figure 3.11-14	Page 3.11-23 notes that ODOT NAAC impacts are expected at East Delta Park. The figure shows that a noise wall was not considered at this location. Please describe the analysis that was used to determine that mitigation of the projected noise impact to East Delta Park should not be included in the project. Please include an evaluation of whether this proposed noise impact constitutes a 4(f) constructive use in Chapter 4 - Section 4(f) Evaluation. Dozens of PP&R staff report daily to East Delta Park as their primary workplace - please evaluate whether these workers would be negatively affected by the proposed noise impacts.
	99	Chapter 4 - Section 4(f) Evaluation	general		IBR will need to provide precise information about impacts to any PP&R-managed trees – any removals, replacements, or relocations. Of particular concern are the mature Sequoias at the southwestern corner of the park, some of which are in ODOT ROW. PP&R will also need information about how trees proposed for preservation will be protected during construction.
	100	Chapter 4 - Section 4(f) Evaluation		Table 4-3	PP&R would like to know more about the design quality and height of the retaining wall proposed near the northwest corner of Delta Park. This wall is now proposed on PP&R-managed property within Delta Park. Page 4-35 states this area serves no recreational purpose - PP&R does not agree with this assessment, as this area provides a buffer between the features in this area of the park and the freeway. If this is a high wall, which we expect it will be, the wall will impact the park. This wall will be a visual and shadow-creating structure that could be imposing to park users nearby. This area of the park in particular is an area used by indigenous community groups. The Delta Park Powwow and Encampment is held here each June, drawing indigenous community members from all over the Northwest. These park users should be notified and brought into the planning and design process for this wall. Mitigation for the impacts of this proposed wall should be incorporated into the project. Maintenance responsibility for the proposed wall should also be clearly identified through this process - PP&R assumes ODOT will have maintenance responsibility for the wall.
	101	Chapter 4 - Section 4(f) Evaluation	4-32	Table 4-1 and 4-3	Table 4-1 states that only "recreational" sections of the Marine Drive Trail area protected by Section 4(f). Table 4-3 states that only 122 feet of recreational sections of the trail will be impacted, and the impacts will be temporary. Page 4-32 provides an explanation of the methodology used to determine which sections of the trail are recreational. No drawing or figure is provided. The Marine Drive Trail is part of the 40-mile Loop, a trail focused on providing access to nature and recreation, and is identified in City Title 33 as a Public Recreational Trail. PP&R does not necessarily agree with the language in this report stating that only certain portions of the trail are recreational assets protected by Section 4(f) - please provide a figure or drawing showing the analysis performed to determine which sections of the trail have a primarily recreational purpose to allow PP&R to fully understand how the conclusions in the report were reached.
	102	Chapter 4 - Section 4(f) Evaluation		Table 4-3	PP&R would like to know more about the need for the PP&R-managed property on the northeast side of N Union Court for a multi-use path. Can the project fit the desired improvements within the existing ROW without taking the PP&R-managed land? Will a property appraisal be completed to determine the value of this land and any other PP&R-managed property?
	103	Chapter 4 - Section 4(f) Evaluation	general		PP&R does not support an MLK SB off-ramp that is aligned with the entrance to Delta Park from Union Court. MLK SB off-ramp should be reconsidered with design refinement options also addressing concerns from PBOT, with a preference for the off-ramp to be located or reconfigured further south away from the park entrance on Union Court closer to N. Hayden Meadows Drive in order to avoid impacts to the park. If the ramp remains in the proposed location in alignment with the entrance to Delta Park, the additional noise and traffic generated by the ramp should be considered as a 4(f) impact to the park. If the ramp is relocated closer to N. Hayden Meadows Drive, the increase in traffic along the north end of the park should be evaluated - increased truck traffic adjacent to the park could also result in a 4(f) impact to the park.
	104	general			PP&R was unable to locate information about impacts to private property trees in the report. Impacts to private property trees should be evaluated through this process. In Portland, PP&R's Urban Forestry division regulates removal of private property trees as well as requiring protection during construction per City Title 11. Information about impacts to private property trees will be required to satisfy Urban Forestry permitting requirements.
	105	Noise and Vibration TR			The noise analysis does not consider people standing near or walking / biking / rolling under the I-5 bridges at Hayden Island or Marine Drive interchanges. Highway traffic and light rail vehicles moving overhead will generate noise for people under or near the bridge underpasses. What considerations is the Program making to reduce noise levels for people near or under the bridges? The analysis also excludes future planned land uses that weren't existing or permitted, so potential future residential uses near the highway and light rail were not factored into the noise impacts. For example, commercial mixed use zones that allow residential uses, but don't currently have residential uses, were intentionally excluded from the noise impact analysis. The 2009 Hayden Island Plan anticipates future transit-oriented mixed-use development near the future Hayden Island MAX station, where residential uses don't currently exist, but the noise analysis shows no impacts because there aren't nearby residential uses currently.
	106	Transportation TR 1.1.3.1	1-39	Tbl 1-2	Consider adding rows to this table discussing the following: - Emergency response access differences - Crash analysis differences - Property acquisition differences - Rough total costs of each option
	107	Appendix B, Public Involvement	14	Advisory Groups	All members are listed from September 2023. It seems like this could and should be updated through release of the FSEIS. PBOT member on Equity Advisory Group has changed, for example.
	108	Appendix B, Public Involvement	2	Primary Audiences	The list of community members in the first point should recognize that those identifications aren't necessarily exclusive of others in the same list. There are people experiencing homelessness who are also living with a disability, as an example. The overlapping identifications make these community members even more vulnerable to the impacts of this project requiring more thoughtful and directed mitigations.

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	109	global			As the City previously commented (such as in the Acquisitions, Public Services, and Visual Quality technical reports), it would be very helpful to know where, if at all, the ODOT permit office would be relocated. If it were moved elsewhere on Hayden Island, it would have many direct and indirect impacts to the neighborhood, especially concerning traffic on local street, potential of transit-oriented development, and community cohesion. If the permit office is moved off island or the functions replaced in a non-physical way (such as online or through another office), there would be different impacts or no impact. Page 4-18 of the Visual Quality technical report says "*The existing ODOT permitting facility lies directly adjacent to the I-5 mainline. This facility would be removed and relocated within the new I-5 right of way. Visual impacts associated with the new permit facility would likely be similar to existing conditions....The final location, building, and site design will be determined in future phases but will likely be relocated within ODOT right of way.*" No further detail is given about where within the new I-5 right-of-way the ODOT permit facility would be relocated. Without more information, it is unclear how the conclusion was reached that visual impacts would likely be similar to existing conditions.
	110	Ch. 4 Draft Section 4(f) Evaluation	4-1		The Chapter Contents insert on page 4-1 doesn't match the headings in the main body for the sections listed. In addition to correcting this, consider replacing it with a table of contents with page numbers.
	111	Parks and Recreation Section 3.4.1	3-10		The summary of East Delta Park should mention the trees at the park, along with the list of other amenities.

Portland Bicycle Advisory Committee

Working to Make Bicycling a Part of Daily Life in Portland

1001 SW 5th Avenue, Room 1300
Portland OR 97204



November 13, 2024

To: Millicent Williams, Director, Portland Bureau of Transportation
Priya Dhanapal, City of Portland Deputy City Administrator
Public Works Service Area

Cc: Caitlin Reff, Brenda Martin, Roger Geller; PBOT staff

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. We have greatly appreciated both the Interstate Bridge Replacement Program (IBR) Team and City staff attending Portland Bicycle Advisory Committee (BAC) meetings to present on project milestones, discuss questions and concerns and invite comments, including most recently for publication of the Draft Supplemental Environmental Impact Statement (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.

As detailed within this letter the BAC has 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.

The BAC advises City Council and City bureaus on all bicycling-related matters and thus has a role in bicycle planning, design, and implementation activities, as well as supporting efforts to improve safety and comfort for all people riding bicycles throughout Portland. It is in this capacity that we are writing to you to express our disappointment 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.

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 during the BAC presentation. 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

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).

We 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. We 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, we 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. We 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 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. 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.

We appreciate that this project will provide much needed safety and comfort improvements compared to the current conditions on the I-5 bridge. We are very grateful to City staff for their continued engagement with us to try and shape this project. We look forward to continuing this engagement as the project moves into design.

However, this major regional project can and should do much more. We are hopeful that the IBR Team is receptive to our advice so that we will see our City and regional visions reflected in the final DSEIS concept.

Thank you for your time, consideration, and all that you do for Portland.

Jim Middaugh, Chairperson
Portland Bicycle Advisory Committee

Joseph Perez, Vice Chairperson
Portland Bicycle Advisory Committee

Portland Pedestrian Advisory Committee:
Comments on Interstate Bridge Replacement (IBR) Project DSEIS

Date: November 18, 2024

To: Millicent Williams, Director, Portland Bureau of Transportation
Priya Dhanapal, City of Portland Deputy City Administrator, Public Works

From: Portland Pedestrian Advisory Committee (PAC)

Re: Comments on Interstate Bridge Replacement (IBR) Project Draft Supplemental Environmental Impact Statement (DSEIS)

In a joint letter with the Bicycle Advisory Committee (BAC) on the Modified Locally Preferred Alternative (MLPA) in 2022, the Pedestrian Advisory Committee highlighted a series of thematic concerns with the project. These concerns included Transparency; Neighborhood Access and Design; Equity and Climate Justice; Bridge Design; and Performance Metrics.

The PAC would like to re-emphasize the concerns stated in 2022 as many are still relevant and highlight more recent observations found in the DSEIS materials. To remain consistent with the 2022 letter, these are nested under a selection of the previously identified thematic areas. In addition, the PAC would like to underscore the importance of ensuring that pedestrians will be able to conveniently access the bridge. Increasing active transit supports climate goals.

Neighborhood Access and Design

Consideration should be given to improvements for walkers, rollers and riders that are needed on both ends of the bridge. N. Victory Blvd. between the southern terminus of the shared use path and access to Delta Park via N. Whitaker. Improvements to this segment of Victory Blvd. – roughly ¼ mile in length – would help strengthen connections across the significant footprint of the freeway between the shared use path terminus, the existing MAX light rail station and Delta Park. This would be consistent with the "ladder" concept that links parallel north-south paths on both sides of the freeway at regular intervals. Ensuring paths leading to the bridge are at grade will ensure active transit users don't lose elevation that they will have to regain to access the bridge, making travel more difficult.

Equity and Climate Justice

More information is needed on the benefits (or not) of the shared use path's position on the single-level vs. double deck fixed span options that are described in the DSEIS documents. The double-deck fixed span option locates the shared use path beneath the northbound traffic lanes of the freeway, reducing noise levels for blind or low-visibility users who may rely more on auditory signals. However, those equity priority communities more affected by

discrimination and/or violence may prefer the single-level fixed span option as it offers more visibility to the shared use path from passing vehicles using the traffic lanes.

Bridge Design

To best achieve state, regional and local carbon reduction goals, special attention needs to be given to the walking, rolling or riding experiences on the new shared use path. The main crossing of the Columbia is roughly 3,300 feet long, or over a ½ mile. Pedestrian amenities including seating, interpretive displays, enhanced viewpoints (among others) will help to make the long crossing distances more attractive to an inter-generational community. Access to and from the shared use path on both sides of the river needs to offer both resiliency and redundancy. Consideration needs to be given to the slopes of the grades to achieve the desired height(s) above the shipping channel in the river, and how the access facilities on both sides of the river are integrated within bridge land spaces in ways that feel safe, comfortable and convenient for the targeted 8 – 80-year-old potential user groups.

The PAC looks forward to continuing to work with IBR and PBOT project staff to develop a bridge project that walkers, roller, and riders from two states and two cities can be proud of. The IBR project represents a high-visibility gateway location to announce the region's commitments to reducing carbon emissions and achieving healthier outcomes for generations to come.

To: Millicent Williams, PBOT Director

From: Portland Freight Committee

Date: 11/7/2024

Re: Interstate Bridge Replacement (IBR) Draft SEIS Comments

The Interstate Bridge Replacement brings significant benefits to our region, creating modern, seismically resilient, and multimodal bridges that will provide safe and accessible options for those driving, walking, biking, rolling, and taking transit. More than 143,000 vehicles and over $132 million in goods cross the bridges each weekday. The program will create more reliable travel times, improved safety, and improved access to goods and services, while working towards meeting state, regional, and local climate goals of reduction in greenhouse gas emissions and air quality improvements.

As the Chair of Portland's Freight Advisory Committee (PFC), I would like to take this opportunity to summarize the PFC's comments on the Draft Supplemental Environmental Impact Statement (SEIS) for the Interstate Bridge Replacement (IBR) project. The PFC supports the aim of the IBR project to improve mobility along the I-5 corridor and to make the movement of goods across the Portland region more efficient and reliable.

One remaining concern the PFC has is the need to enhance the separation of key freight routes from Delta Park. This improvement is essential not only for facilitating better freight access but also for safeguarding Delta Park from potential transportation impacts. We believe that addressing these issues will support both our freight operations and Delta Park's natural environment.

Additionally, we ask that IBR develop, and advance design concepts aimed at improving traffic flow and safety on and off MLK in support of PBOT's requests to date. We would support a concept that provides direct connections to and from MLK to the Vancouver Way and Jubitz area, effectively enhancing access to key freight destinations and the Bridgton Neighborhood.

In addition, the group Freight Committee requests your help in ensuring that the project works to minimize congestion during and after the project, and that the project thoughtfully analyzes the impact of diversion from tolling.

As representatives of the Portland freight community, we deeply appreciate PBOT's leadership in developing this plan with the IBR team. We look forward to collaborating further to ensure that the needs of the freight sector are effectively integrated into the planning process.

Thank you for considering our insights as you move forward with this important work.

Sincerely,



Jana Jarvis – Chair Portland Freight Advisory Committee

City of Portland
Design Commission

1900 SW Fourth Ave., Suite 5000
Portland, Oregon 97201
Phone: (503) 823-7300
TTY: 711
www.portland.gov/ppd/design-commission

Date: **October 24, 2024**

To: **Portland Bureau of Transportation (PBOT)**
Caitlin Reff, Manager Major Projects & Transit
503-823-8758. caitlin.reff@portlandoregon.gov
Shawnea Posey, Capitol Project Manager Major Projects & Transit
503-823-5179, shawnea.posey@portlandoregon.gov

From: **Portland Design Commission**

Re: **Portland Design Commission comments for Interstate Bridge Replacement Draft Supplemental Environmental Impact Statement (IBR - DSEIS)**

Hi Caitlin and Shawnea,

The Design Commission has been briefed by the Interstate Bridge Replacement Team (IBR) on the Draft Supplemental Environmental Impact Statement (DSEIS) by Shilpa Mallem, Design Manager, Interstate Bridge Replacement program at our October 17, 2024, Design Commission hearing.

Please incorporate the following comments into PBOT's IBR DSEIS response.

- The Portland Design Commission supports the PBOT 9/16/2024 letter to City Council and Interim DCAs, and as discussed in the October 17, 2024 Design Commission Briefing, noted the remaining Conditions of Approval not yet met per the Portland City Council approval of the Modified Locally Preferred Alternative. Specifically, that an Urban Design Advisory Group, focused on urban design elements, has not yet been created.

- While the IBR Team explained there were two groups created that Design Commissioners "could apply" to be on [Community Advisory Group (CAG), and the Equity Advisory Group (EAG)], the Design Commission disagrees that these groups are the right forum for our engagement with urban design elements. These two community groups were not created as Urban Design Stakeholder groups, rather they were created as affinity groups for the communities at large. A group of design professionals should not be at the table with a group of community members to talk about design if those community members are also not design professionals. An obvious unintended consequence is that community members are not comfortable voicing opinions that contradict those of design professionals. Our participation in such a group would weaken the power of the community's voice and undermines the authenticity of community engagement groups.

- Therefore, the Design Commission requests that PBOT continue to bring information back to Design Commission before critical "design decision" stages and before critical design decisions have been made, thereby honoring IBR's stated agreement to **develop a public involvement plan to identify the appropriate stakeholder groups and methods of engagement around urban design elements**.

- Lastly, as noted in the fall of 2023, Design Commission communicated to IBRP (through City staff) their continued interest in collaborating with the City of Vancouver's design counterparts to provide coordinated design input; we ask that this collaboration also be incorporated into your process.

Thank you for your consideration, the Portland Design Commission

Brian McCarter, Chair



Chandra Robinson, Vice-Chair



Sam Rodriguez, Past-Chair



Joe Swank



Zari Santner



Sara Vaz



Tina Bue



IBR Draft SEIS - RECORD #3846 DETAIL

First Name :	Peter
Last Name :	Wenzel
Attachments :	DSEIS-3846_Wenzel_Original.pdf (7 kb) Screenshot_20241118-215054.png (296 kb)

IBR Draft SEIS - RECORD #3846 DETAIL

Submission Date : 11/21/2024
First Name : Peter
Last Name : Wenzel
Business/Organization/Agency :

Submission Input :

Your web server crashes when comments are submitted on the site, as shown in the attached screenshot. So I am copying the text below to email instead.

Benjamin Page
Studio Functions Properties LP
[redacted]

We own one of the floating homes and slips at Jantzen Beach Moorage. Our exact home is identified on diagrams as being on the furthest east row (nearest the freeway bridge) labeled as being "temporarily impacted". Please explain exactly how the temporary impact will manifest. Will the home need to be moved to clear an over-water construction easement? If so, where and by whom? If left in place, will it be impacted by construction noise, pollution, and danger?

After the row of homes immediately to our east are removed (as indicated by the "residential impacted" shading), what will be the hydrologic impact on our dock, which would no longer be protected by an upstream dock and row of homes?

Land surrounding and including the JBMI East gate and first ramp are indicated as being taken. How will the remaining residents reach their homes, from both a driving standpoint and walking from on-shore parking to the homes?

The proposal diagrams, including video "fly-over" depict a smaller auxiliary bridge being built only a few feet from our home. This would seem to imply a permanent impact that must be mitigated, and would likely render the homes in the immediate area unusable. The impacts and mitigations are inadequately accounted for.

IBR Draft SEIS - RECORD #3847 DETAIL

First Name :	Taylor
Last Name :	Tremain
Attachments :	DSEIS_Tremain_Original.pdf (17 kb)

TAYLOR TREMAIN: Thank you for putting this together. I just wanted to express my support. I was very glad to see that a light rail extension of the yellow line from Expo Center to Vancouver is included in the plans.

I live in North Portland, and I live very close to the I-5 Bridge as it goes over the river, and I'm very excited to see that there is that extension because I think that would really help clear some of the passenger -- single occupancy vehicles going across the bridge and help to reduce traffic congestion that way, so I just fully support that component of the plan and that's all I have to say. Thank you.

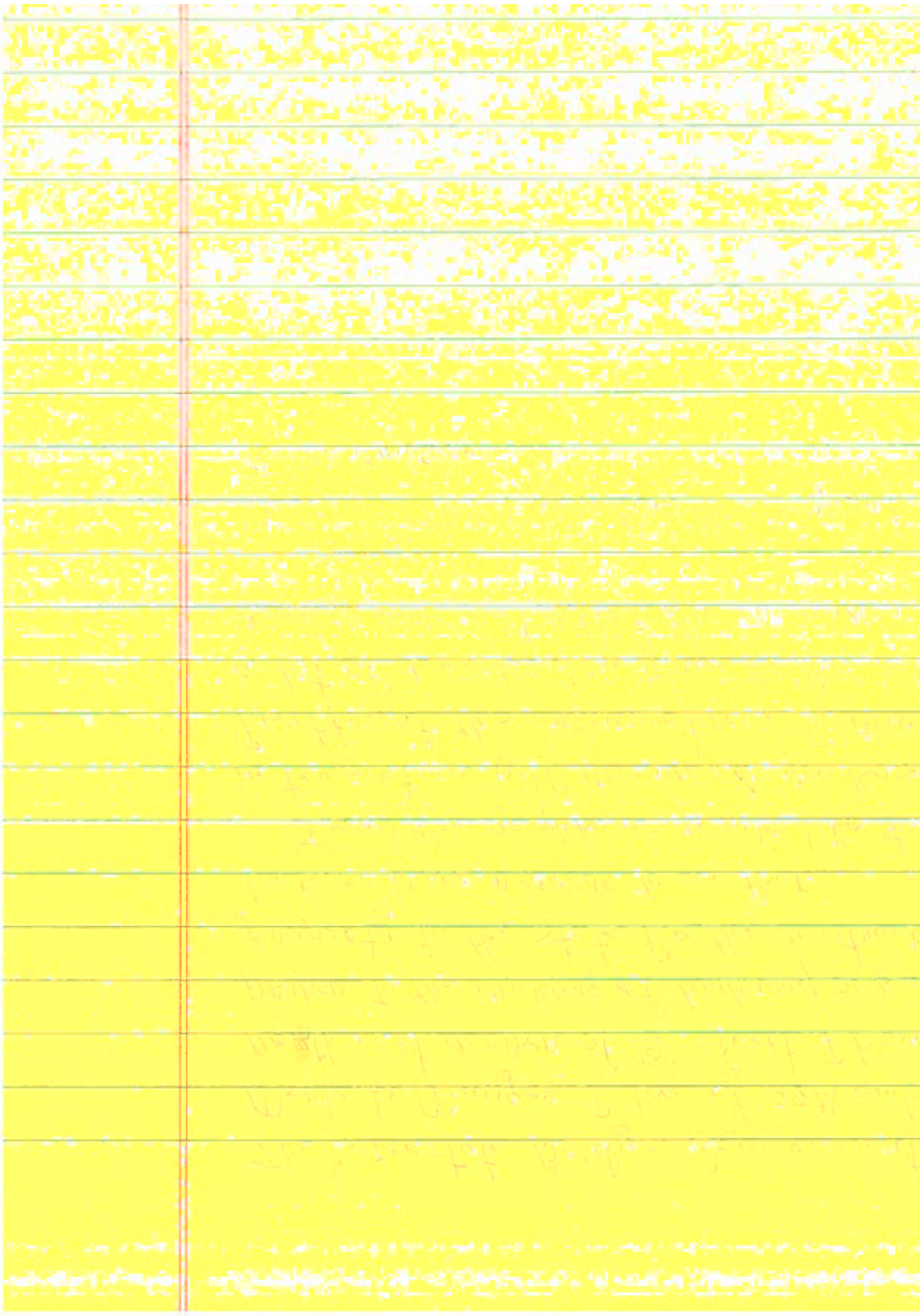
IBR Draft SEIS - RECORD #3849 DETAIL

First Name :	Merle
Last Name :	Munger
Attachments :	DSEIS-3849_Munger_Original.pdf (3 mb)

The interstate Bridge Replacement
Merle L. Munger I live at [redacted] I have owned this property
prior to the Building of high way 502. In fact I sold some
property to the state for the construction of 502. You can
look on your Records to see that.

I and the neighbores would like to Know how this
intersection will change. As you Know there is a lot
Traffic at this intersection. I think there should be
a lot of consideration given to this intersection. And of
Coarse how will afect the neighbor hood.

Thank you for the opportunity to contribute
to the cause.



IBR Draft SEIS - RECORD #3850 DETAIL

First Name :	Walinda
Last Name :	Weekly
Attachments :	DSEIS-3850_Weekly_Original.pdf (127 kb) WALINDA_WEEKLY_SEIS_COMMENTS.pdf (216 kb)

November 5, 2024

Interstate Bridge Replacement Program
Attn: Draft SEIS Public Comment
500 Broadway, Suite 200
Vancouver, WA 98660

RE: Public Comment

Dear Sirs/Madam,

I am an independent homeowner that is extremely excited about the new bridge project. I grew up in the San Francisco Bay area and get extremely excited every time I cross the new Bay Bridge. I was also in the 1989 Earthquake and saw first-hand how a bridge can fall. I also visited the Cypress Freeway that collapsed.

I hope everything with the new Interstate Bridge stays on budget so you can begin this next exciting chapter of my home and life. Safety and mobility are a priority on my list because I live close enough to be impacted. I am currently upgrading my home to sustain this project.

Questions:

A. What type of housing structures or proposals to be implemented for the influx of bridge workers?

B. Will there continue to be a Martin Luther King Jr. Boulevard in the new bridge area, or will there be a name change?

C. Is my residence in a displacement area considering I live about 5 blocks off the Rosa Parks Exit?

D. What number of jobs provided during construction?

Sincerely,

Walinda Weekly

Walinda Weekly
[redacted]

November 5, 2024

Interstate Bridge Replacement Program
Attn: Draft SEIS Public Comment
500 Broadway, Suite 200
Vancouver, WA 98660

RE: Public Comment

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D. What number of jobs provided during construction?

Sincerely,

Walinda Weekly

Walinda Weekly
Independent Homeowner
(971) 804-9770
311 North Dekum Street
Portland, OR 97217

IBR Draft SEIS - RECORD #3851 DETAIL

First Name :	Richard
Last Name :	Rylander
Attachments :	DSEIS-3851_Rylander_Original.pdf (1 kb)

IBR Draft SEIS - RECORD #3851 DETAIL

Submission Date :	11/16/2024
First Name :	Richard
Last Name :	Rylander
Business/Organization/Agency :	

Submission Input :

The impact on local historical (know and unknown-yet to be discovered) along with the lack of correction of the traffic issues and the exorbitant cost makes this proposal illogical.

IBR Draft SEIS - RECORD #3852 DETAIL

First Name :	Margaret
Last Name :	Tweet
Attachments :	DSEIS-3852_Tweet_Original.pdf (27 kb)

IBR Draft SEIS - RECORD #3852 DETAIL

Submission Date : 12/6/2024
First Name : Margaret
Last Name : Tweet
Business/Organization/Agency :

Submission Input :

In case this did not go thru, resubmitting again. Cannot find it in sent file.hyperlinks removed now. If left a couple, just ignore them, and please accept this revision. Sincerely, Margaret Tweet

CRC forecasts on ridership have not materialized. These (IBR) forecasts seem inaccurate and unrealistic, like CRC was.

Margaret Tweet, Camas 98607

Source: Report at Clark County Today on CTRAN and TriMet ridership data

“National and local transit ridership down significantly feds report” May 7, 2024

https://www.clarkcountytoday.com/news/national-and-local-transit-ridership-down-significantly-feds-report/

(Excerpts from above article submitted as public comment)

“Here in the Portland metro area, TriMet data mirrors the national trend of reduced transit ridership. In March 2024, ridership remained 34 percent below pre pandemic levels and about half its 2012 peak.

At C-TRAN, ridership was down nearly 37 percent at the end of 2022 compared to pre pandemic ridership. Furthermore, C-TRAN ridership peaked in 1999 at 7.75 million boardings. They had just 3.97 million boardings on their fixed route system in 2022; 49 percent below the peak almost a quarter century ago.

This issue is vitally important to Clark County and Portland metro citizens because the Interstate Bridge Replacement Program (IBR) team members are telling the community that there will be between 26,000 and 33,000 daily transit boardings on the I-5 corridor in 2045. This is likely designed to justify their proposal that $2 billion be spent on a 3-mile MAX light rail extension into Vancouver as part of their $7.5 billion proposal.

C-TRAN offers the only transit service over the Columbia River. The agency experienced a 61 percent drop in passenger boardings on its express bus system over the two years of pandemic lockdowns. The agency shared numbers for nine separate routes traveling over the river for the 2019 to 2021 years. In 2019, it had 1.4 million boardings which then declined to 555,000 in 2021..

Express Routes crossing the I-5 Bridge saw an average of just 523 daily boardings in 2022, C-TRAN shared with Clark County Today.* Express Routes crossing the I-205 bridge saw an average of 273 daily boardings. Overall, C-TRAN carried 14.5 people per hour of service across their entire bus network in 2022, according to its annual report.**

For the IBR transit projections to be accurate, daily ridership on the I-5 corridor would have to increase fifty-fold to reach their 26,000 number. It would have to increase 63 times to reach the 33,000 number."

"With over one quarter of the $7.5 billion project being the 3-mile light rail extension, and the price tag of the project scheduled to increase according to Johnson, one might wonder why they don't consider the cheaper and more flexible alternative of buses. C-TRAN has built two Bus Rapid Transit lines for $50 million each, a small fraction of the $2 billion cost of extending light rail. Furthermore, it would eliminate the "new revenues" (aka taxes) TriMet is demanding from both states for the operations and maintenance of the light rail into Clark County.

Nationally and locally, transit ridership remains significantly depressed. As more people work from home, others seek to work in suburbs instead of downtown."

"The Cascade Policy Institute has documented multiple broken promises by TriMet https://www.clarkcountytoday.com/news/trimets-broken-promises-on-getting-people-to-use-transit/,*** when it comes to the MAX light rail service. Every time they have failed to meet those promised levels of service or passengers being carried.

TriMet officials promised the Federal Transit Administration (FTA) in their Full-Funding Grant Agreement that Yellow Line peak-hour trains would arrive every 10 minutes and off-peak trains every 15 minutes. The promised service according to the Environmental Impact Statement (EIS) was supposed to reach eight trains during peak hours in 2020, or one train every 7.5 minutes.

The EIS forecasted ridership in the corridor would dramatically increase with the building of the Yellow Line. By 2020, the line's ridership was expected to have 18,100 average weekday riders. It was 5,290, with a shortfall of 12,810 riders. In March 2024, ridership recovered to 10,880 boardings or 5,440 riders. MAX light rail costs https://trimet.org/about/pdf/trimetridership.pdf**** have increased 27.5 percent from a year earlier to $9.73 per boarding. "

'With one out of eight people working from home, is there a need for any "high capacity" mass transit over the Columbia River? National and local ridership trends indicate the answer is no."

*"C-TRAN 2022 financial results show decline in operating revenue per passenger", August 9, 2023

https://www.clarkcountytoday.com/news/c-tran-2022-financial-results-show-improvement/

Last section of the article:

"Express Routes crossing the I-5 bridge saw an average of 523 daily boardings in 2022.

Express Routes crossing the I-205 bridge saw an average of 273 daily boardings.

Note that these numbers include Express only, as requested, and does not include Regional routes that also cross the Columbia River.”

**Source 2022 Annual Comprehensive Financial Report For the Fiscal Year Ending December 31, 2022

https://www.c-tran.com/images/CAFR/c-tran_2022_acfr.pdf

***TriMet’s broken promises on getting people to use transit April 12, 2022

Where are the missing 50,000 light rail passengers?

In the past two decades, TriMet has opened four new MAX light rail lines. The Red Line connecting the airport to downtown opened in 2001. The Yellow Line opened in 2004; the Green Line in 2009, and the Orange Line in 2015.

Total MAX ridership peaked a decade ago in 2012 at 35 million originating rides, declining 12 percent to just below 31 million in 2019 before the pandemic. The addition of two new light rail lines failed to stimulate ridership. TriMet officials appear to be on track to be short of their optimistic projections by over 50,000 passengers for just two of those lines.

Travel times are nearly 50 percent longer than TriMet promised citizens. The $350 million Yellow Line, with its multiple stops in north Portland, travels an average of 14 miles per hour (mph).

As the Portland metro area prepares to learn important details regarding the Interstate Bridge Replacement (IBR) program, critical facts should be key to the choices offered to the decision makers on the Executive Steering Group (ESG) and the Bi-state Bridge Committee of 16 legislators. Those include the number of total lanes across the bridge; the Hayden Island interchanges, and the height of the bridge to accommodate marine traffic.

Due to the highly contested Columbia River Crossing (CRC) debate, the critical issues of tolling and the type of mass transit will be front and center for Clark County residents. Decision makers should be presented with all the details and options, and then be allowed to decide each of these components.

Clark County residents strongly opposed bringing TriMet’s MAX Yellow Line light rail into Vancouver not only a decade ago, but from the beginning. A 1988 plan was scrapped after Clark County voters defeated a proposal to raise $236.5 million in 1995 and Oregon voters turned down a $475 million regional ballot measure in 1998.

In fact a report to the Federal Transit Administration (FTA) highlights planning actually began 40 years ago for light rail to Vancouver. What has changed since then regarding mass transit and light rail?

Six of the IBR team's "options" for high capacity transit on the proposed bridge include light rail; five of which run along I-5 real estate instead of connecting with the downtown Vancouver Turtle Place transit hub. Why wouldn't they connect two forms of transit service?

Broken light rail promises

The Yellow Line MAX light rail line opened to great fanfare in May 2004. The Yellow Line's final Environmental Impact Statement (EIS) made a myriad of predictions for the year 2020, including high ridership, frequent service, and quick travel times. None of these promises were ever delivered by TriMet.

The Cascade Policy Institute's Rachel Dawson laid out the details in a September 2019 point paper https://cascadepolicy.org/transportation/the-max-yellow-line-a-look-back-after-15-years/. This highlights pre-pandemic levels of failed service. Additional details were provided

TriMet officials promised the FTA in their Full-Funding Grant Agreement (FFGA) that peak-hour trains would arrive every 10 minutes and off-peak trains every 15 minutes. The promised service according to the EIS was supposed to reach eight trains during peak hours in 2020, or one train every 7.5 minutes.

Instead of having 10-15-minute headways between trains, the Yellow Line currently runs every 15 minutes during peak-periods and every 30 minutes during other parts of the day.

TriMet predicted travel times to be 24 minutes from downtown Portland to the Expo Center and 19 minutes from downtown Portland to N Lombard. Light rail speeds were projected to reach 15.3 mph, and bus speeds were projected to be 13.2 mph in 2005, making light rail faster.

TriMet has opened four new light rail lines this century. Ridership on MAX trains peaked two years after opening the Green Line and has been in decline ever since. TriMet reports it will be six years before total ridership returns to pre pandemic levels. Graphic by John Ley from FTA

Actual light rail travel times are longer and speeds are slower than predicted.

It takes 35 minutes to take light rail from downtown Portland to the Expo Center and 28 minutes from downtown Portland to N. Lombard St., even though light rail has its own exclusive right of way. Actual travel times are 46 percent longer to the Expo Center and 47 percent longer to N. Lombard St. than promised. Actual light rail speeds in the corridor only hit 14 mph in 2005, whereas bus speeds averaged 16 mph — significantly faster than predicted.

Who wants to travel 14 mph going to and from work?

The EIS forecasted ridership in the corridor would dramatically increase with the building of the Yellow Line. By 2020, the line's ridership was expected to have 18,100 average weekday riders. It was 5,290, with a shortfall of 12,810 riders.

At no point since the Yellow Line opened has ridership met projected levels. In April 2019 ridership only

reached 13,270, over 26 percent less than projected. This number did not meet 2020 projected levels. From March 2016 to March 2019 ridership levels decreased by 3.6 percent. The pandemic lockdown caused transit ridership to decline roughly 70 percent.

Lower than promised ridership isn't unique to the Yellow Line. Every TriMet light rail forecast has been wrong, and always wrong on the high side, Dawson reported.

The Yellow Line was expected to provide superior service compared to the no-build bus alternative. This forecast hasn't panned out. The $350 million Yellow Line replaced bus service (Line #5), which if it were still operating, would have seven-minute headways between Vancouver and downtown Portland. C-TRAN express service was forecasted to have three-minute headways according to Carson.

Light rail does not reach any more people or businesses than Line #5 did. In fact, Line #5 had more stops along Interstate Avenue, meaning some riders now have a longer walk to get to the MAX stations.

TriMet bus service from Vancouver to downtown Portland continues to be an option even after the Yellow Line's construction. Line #6 was changed to pick up the link between Jantzen Beach and the Yellow Line's Delta Park stop that Line #5 had previously served. It then continues down MLK Boulevard to the Portland city center.

A 2011 Household Survey shows that 70 percent of people commuting to work used their cars. TriMet ridership peaked in 2012 and has been in decline ever since. Metro included this in their 2018 Regional Transportation Plan (RTP), the year a PEMCO survey reported 94 percent of people preferred their cars. Graphic courtesy Metro

A 2011 Household Survey shows that 70 percent of people commuting to work used their cars. TriMet ridership peaked in 2012 and has been in decline ever since. Metro included this in their 2018 Regional Transportation Plan (RTP), the year a PEMCO survey reported 94 percent of people preferred their cars. Graphic courtesy Metro

In Spring 2019, Line #6 saw 665 average weekday on/offs at Jantzen Beach and only 190 total on/offs at Delta Park. The vast majority of Vancouver commuters on Line #6 opt to stay on the bus to Portland instead of transferring to the Yellow Line light rail, according to Dawson.

The 2019 data showed the Yellow Line had 120 rides per every hour the vehicle was in operation. The average trip length was 3.2 miles, clearly not taking many vehicles off the freeways for trips that short.

TriMet reports in 2021 the cost per boarding rider on their MAX light rail was $9.08. The cost per vehicle hour is $449, whereas the operating cost per hour of a TriMet bus is $116.

C-TRAN recently slashed their express bus service across the Columbia River as their ridership on seven separate express lines declined to less than 1,000 people daily due to the pandemic. TriMet has reported it will

take six years for ridership to return to pre pandemic

The Green line problems

The TriMet Green MAX Line under-performs as well. “Some trips that actually use the Green Line were shifted in the ridership predictions to the artificially fast bus services,” was the excuse TriMet officials used in their report to the FTA.

Green Line service was promised at 10 minutes between trains during weekday peak periods and 15 minutes during other times. The project opened with 15-minute intervals throughout the day and 35-minute intervals in the evenings. Service remains at 15-minute headways during much of the day.

When the FTA completed its 2015 “Before and After Study” on the line, there was an average 24,000 daily weekday boarding rides. This was 19 percent below the 30,400 riders that TriMet predicted in their preliminary engineering for the line’s opening year.

That number has continued to decrease to just over 16,000 average daily riders in August 2019, making up only 34 percent of the FEIS’s predicted ridership levels for 2025. With just over three years to go until 2025, it seems unlikely that the Green Line will attract the additional 30,500 riders needed to hit TriMet’s promised level of 46,500 boarding rides.

In 2020, it carried just 7,980. That’s a shortage of over 38,000 riders on the Green Line. When added to the 12,000 shortfall on the Yellow Line, TriMet is missing over 50,000 boarding riders.

Unsurprisingly, the line’s cost was higher than TriMet originally anticipated. The final price tag of $576 million was 14 percent greater than the anticipated cost in preliminary engineering, a difference of about $70 million.

A Feb. 2020 news report indicated TriMet downgraded its estimate of the number of daily passengers the newest Orange line would serve to 37,500, down from 43,000. The lowered number illustrates what a moving target ridership can be. TriMet has struggled to meet projections for the Orange Line, which since 2015 has run between downtown and Milwaukie. They did not meet TriMet’s first-year projections by nearly 6,000 riders a day.

The 2020 report shows Orange line ridership at 3,350 weekday riders. That is down over 70 percent from 2019 numbers of 12,160 riders. This would add nearly 40,000 missing riders from when the project was initially sold to the community.

Crime increased

Instead of the promised passengers, light rail brought increased crime to the Clackamas Town Center area. Clackamas County experienced heightened crime in the corridor from 2009-2012 after the Green Line opened and an increase in graffiti around MAX stops, according to a survey by the Oregon High Intensity Drug Trafficking Areas Program sent to the Clackamas County Sheriff.

Last month a man was shot on the green line https://www.kgw.com/article/news/crime/one-person-shot-max-green-line/283-6e2d5b3c-4257-4072-893e-f9b662552760. Last November a Green Line MAX driver prevented an attempted stabbing https://www.kgw.com/article/news/crime/max-train-stabbing-clackamas-town-center/283-a36579f6-63a0-483c-a776-45faf80f74a8 at the Clackamas Town Center stop. The MAX system still saw more violent acts and other major security incidents in 2017 than any year since TriMet began reporting to the FTA in 2008.

TriMet's own crime statistics for 2017, showed 63 reports of aggravated assault against customers, an increase of 43 percent. Reports of simple assault, resulting in minor or no injuries, climbed 81 percent, to 168. Half of those crimes occurred on the MAX system, while about a quarter occurred on buses.

Things have gotten so bad that in January TriMet confirmed that police won't be checking passengers for fares, but instead will be seeking to protect drivers and passengers.

Citizens on both sides of the Columbia River have concerns about MAX light rail. In 2020, metro area residents in Oregon rejected a $5.2 billion bond measure that would have allocated roughly $2.9 billion on a new light rail line to Tigard/Tualatin. The measure was defeated in all three counties, 58 percent voting no.

Eight months prior to the vote, TriMet lowered passenger estimates. The planned $2.9 billion light rail line between downtown Portland and Bridgeport Village in Tigard would serve 12 percent fewer passengers than previously forecasted.

The 2018 PEMCO survey reported 94 percent of people in the Portland area prefer to use their cars. Their private vehicles were faster and more convenient than riding transit. Over half respondents said they wouldn't make any changes and another 15 percent they would drive more often if they could. That was before the pandemic where mass transit experienced 70-80 percent declines in ridership nationally.

Oregon Transportation Commissioner (OTC) Robert Van Brocklin recently said only 4 percent of people in Portland use transit. Other data indicates while some Portland neighborhoods use transit at a much higher rate, the broader metro area transit ridership remains low. Since the IBR is a regional issue, how likely is it that the region will embrace greater transit ridership across the Columbia River?

The Oregon Transportation Commission 2019 survey results indicate 51 percent of respondents want to expand and improve interstates and interstate bridges to fix traffic congestion. Another 14 percent want to expand and improve arterials. Only 11 percent wanted to expand multi-modal options and 6 percent wanted to change driving times. Graphic courtesy Oregon Transportation Commission

An April 2019 OTC survey asked "what would you like transportation officials to do about traffic congestion?" The responses indicated 51 percent want to "expand and improve interstates and interstate bridges." Another 14 percent want to "expand and improve arterials." That makes 65 percent of Oregon respondents want to expand vehicle capacity and improve roads to reduce traffic congestion.

The IBR team members appear to be favoring extending the Yellow Line into Vancouver, in spite of data showing few people will ride it. They have said there is “substantial demand” for high capacity transit, but haven’t provided that data.

****Audited* TRIMET SERVICE AND RIDERSHIP INFORMATION as of 10/30/2024

https://trimet.org/about/pdf/trimetridership.pdf

Operating Costs/Boarding Ride

	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024
Bus	$2.92	$2.86	$2.90	$3.06	$2.92	$2.83	$3.07	$3.43	$3.80	$4.11	$4.95	$9.60	$7.81	$7.28	$7.18
Rail	$1.73	$1.61	$1.71	$1.87	$1.99	$2.14	$2.36	$2.61	$2.95	$3.28	$4.38	$9.04	$6.87	$7.13	$8.34

System Costs/Boarding Ride

Bus	$3.71	$3.72	$3.81	$4.02	$4.03	$3.83	$4.21	$4.61	$5.10	$5.46	$6.69	$13.20	$10.19	$10.55	$9.81
Rail	$2.39	$2.23	$2.35	$2.58	$2.81	$2.92	$3.23	$3.51	$3.95	$4.32	$5.77	$12.07	$8.87	$9.87	$10.60

Notes and Definition of Terms: * All financial information are based on audited statement.

1 WES - Service begins in February 2009, operating weekday during AM and PM peaks hours between Beaverton and Wilsonville.

2 LIFT/Cab/TNC - Cab revenue Hours and Miles are based on the meter on and off times and billed mileages. TNC Service begins in May 2023.

3 System Costs - Operations cost plus general administrative costs shared across modes and OPEB (i.e. finance, planning, scheduling, etc.). Waivered Non-Medical program, Streetcar, and intergovernmental pass-throughs are excluded.

4 WES - Total actual costs incurred prior to February 2009.

5 Operations Costs - Transportation costs & maintenance costs (all related staff & materials). For bus & rail also includes facilities, field ops, fare inspection, field ops admin, security and store costs. Excluded Ride Connection costs, Unfunded Actuarial Accrued Liability and OPEB.

6 Subsidy per Boarding Ride - The difference between the passenger revenue per ride and the operating cost per ride. This represents the portion of the cost of each ride that must be subsidized (primarily by taxes).

7 COVID-19 began in March 2020.

By Rachel Dawson

TriMet's MAX Yellow Line first opened 15 years ago in May 2004. The Yellow Line's Final Environmental Impact Statement (FEIS) made a myriad of predictions for the year 2020, which makes now the perfect time to reflect on what officials promised and what taxpayers and transit riders have since received.

Yellow Line History

The Yellow Line originated in 1988 as a 21-mile project connecting Vancouver, Washington with Downtown Portland and Clackamas Town Center. This plan was scrapped after Clark County voters defeated a proposal to raise $236.5 million in 1995 and Oregon voters turned down a $475 million regional ballot measure in 1998.

Not to be deterred by a lack of voter support, officials developed a shorter alternative in 1999 that would run from the Expo Center to Downtown Portland along Interstate Avenue. This alternative cost $350 million, 74% of which came from the Federal Transit Administration (FTA).

The construction of the new alternative was not put to a public vote. Portland officials instead expanded an urban renewal district to include the Interstate Avenue Corridor. Doing so allowed them to appropriate $30 million in tax increment funds to finance the rail that otherwise would have gone to other tax-collecting jurisdictions, including Multnomah County. The county commissioners opposed expansion of the urban renewal district, but the Portland City Council approved it anyway.

Looking back after fifteen years, we find that key promises made in the FEIS were never kept:

1. Frequency of Service

What We Were Promised: TriMet promised FTA in their Full-Funding Grant Agreement (FFGA) that peak-hour trains would arrive every ten minutes and off-peak trains every 15 minutes. The promised service according to the FEIS was supposed to reach eight trains during peak hours in 2020.

What We Received: Instead of having 10-15-minute headways between trains, the Yellow Line runs every 15 minutes during peak-periods and every 30 minutes during other parts of the day.

1. Travel Times

What We Were Promised: TriMet predicted travel times to be 24 minutes from Downtown Portland to the Expo Center and 19 minutes from Downtown Portland to N Lombard.[1] https://cascadepolicy.org/transportation/the-max-yellow-line-a-look-back-after-15-years/#_ftn1 Light rail speeds were projected to reach 15.3 miles per hour (mph), and bus speeds were projected to be 13.2 mph in 2005.[2] https://cascadepolicy.org/transportation/the-max-yellow-line-a-look-back-after-15-years/#_ftn2

What We Received: Actual travel times are slower than predicted. It takes 35 minutes to take light rail from Downtown Portland to the Expo Center and 28 minutes from Downtown Portland to N Lombard, even though light rail has its own exclusive right of way. Actual travel times are 45.8% greater to the Expo Center and 47.4% greater to N Lombard. Actual light rail speeds in the corridor only hit 14.1 mph in 2005 while bus speeds averaged 16.1 mph—significantly faster than predicted.

1. High ridership

What We Were Promised: The FEIS forecasted ridership in the corridor to dramatically increase with the building of the Yellow Line. By 2020 the line's ridership was expected to have 18,100 average weekday riders.

What We Received: At no point since the Yellow Line opened has ridership met projected levels. In April 2019 ridership only reached 13,270, 26.7% less than projected. This number will not meet 2020 projected levels based upon the negative trend observed over the past three years. From March 2016 to March 2019 ridership levels decreased by 3.6%.

Lower than promised ridership isn't unique to the Yellow Line; every TriMet rail forecast has been wrong, and always wrong on the high side.

Light Rail Is Not Superior to Bus Transit

The Yellow Line was expected to provide superior service compared to the no-build bus alternative. This forecast hasn't panned out. The Yellow Line replaced Line #5, which if it were still operating, would have seven-minute headways between Vancouver and Downtown Portland. C-Tran express service was forecasted to have three-minute headways.[3] https://cascadepolicy.org/transportation/the-max-yellow-line-a-look-back-after-15-years/#_ftn3

Light rail does not reach any more people or businesses than Line #5 did. In fact, Line #5 had more stops along Interstate Avenue, meaning some riders now have a longer walking commute to the MAX stations.

TriMet bus service from Vancouver to Downtown Portland continues to be an option even after the Yellow Line's construction. Line #6 was changed to pick up the link between Jantzen Beach and the Yellow Line's Delta Park stop that Line #5 had previously serviced. It then continues down MLK Boulevard to the Portland City Center.

In Spring 2019, Line #6 saw 665 average weekday on/offs at Jantzen Beach and only 190 total on/offs at Delta Park. This means that the vast majority of Vancouver commuters on Line #6 opt to stay on the bus to Portland instead of transferring to the Yellow Line.

Given the Yellow Line's history, we can expect the prospective SW Corridor light rail project to increase traffic, have fewer trains than promised, and have lower ridership than predicted. If ridership levels are 26.7% below forecast 15 years into service, why should the SW Corridor ridership estimate of 43,000 daily boardings be taken seriously? The FTA should not offer TriMet additional light rail funding in the future if TriMet is unable to honor its past promises.

TriMet may argue that service levels are below EIS forecasted levels due to a lack of funds. However, TriMet's revenue increase in recent years tells otherwise. Between 1998 and 2018, passenger fares increased by 116% and tax revenue increased by 64%. TriMet's payroll tax has been increasing since 2005 and will continue to go up every year until 2024. There is no issue with revenue; rather, the issue lies with light rail.

Moving forward, Metro and TriMet should focus on creating a more reliable bus network that runs on an already built road system. Doing so will benefit riders and taxpayers alike.

_____

[1] https://cascadepolicy.org/transportation/the-max-yellow-line-a-look-back-after-15-years/#_ftnref1 Federal Transportation Authority, Interstate MAX Before and After Study, 2005, 2-5.

[2] https://cascadepolicy.org/transportation/the-max-yellow-line-a-look-back-after-15-years/#_ftnref2 Id, 2-10.

[3] https://cascadepolicy.org/transportation/the-max-yellow-line-a-look-back-after-15-years/#_ftnref3 North Corridor Instate MAX Light Rail Project, Final Environmental Impact Statement Executive Summary, October 1999, S-17.

Rachel Dawson is a Policy Analyst at Cascade Policy Institute, Oregon's free market public policy research organization.

Click here for PDF version:

19-19-The MAX Yellow Line-A_Look_Back_After_15_YearsPDF

Hello,

We noticed that your submission contains at least one hyperlink. As stated on the Draft SEIS webpage https://www.interstatebridge.org/updates-folder/supplemental-environmental-impact-statement/#comment:~:text=as%20formal%20comments.-,To%20ensure%20the,-administrative%20record%20accurately (see excerpt below), we cannot accept hyperlinked information as part of the comment submission. If you would like to include the hyperlinked information in your comment, please

resubmit it with the information attached or included as part of the text by the end of November 28. Otherwise, we will respond to the text as written and will not review the hyperlinked information. This policy ensures that our records accurately reflect the information you intend to include, as hyperlinks can often change, be incorrectly linked, or be broken. We appreciate your understanding.

Comments submitted through social media and informal conversations will not be recorded as formal comments. To ensure the administrative record accurately and completely reflects the documentation received during the public comment period, written comments should not include any hyperlinks to outside materials or information. Any materials or information the commenter wishes to have considered should be included within the submitted comment. Attachments to e-mails must be specifically referenced in the comment text, including specific citations to page number and passage from the attachments. All audio/video attachments must be transcribed or submitted via the Draft SEIS voicemail line.

To help us understand your interests and concerns, we recommend being specific and including details where possible. For example: “The analysis should consider potential effects from XYZ” or “I would like to see additional mitigation for XYZ.”

Sincerely,

Interstate Bridge Replacement Program

From: tweetfamily@comcast.net <tweetfamily@comcast.net>
Sent: Monday, November 18, 2024 11:58 PM
To: Draft SEIS <draftseis@interstatebridge.org>
Subject: Draft SEIS public comment

“Here in the Portland metro area, TriMet data mirrors the national trend of reduced transit ridership. In March 2024, ridership remained 34 percent below pre pandemic levels and about half its 2012 peak https://www.oregonlive.com/environment/2024/04/earth-day-can-portland-recover-its-bike-and-transit-prime.html.

At C-TRAN, ridership was down nearly 37 percent at the end of 2022 compared to pre pandemic ridership. Furthermore, C-TRAN ridership peaked in 1999 at 7.75 million boardings. They had just 3.97 million boardings on their fixed route system in 2022; 49 percent below the peak almost a quarter century ago.

This issue is vitally important to Clark County and Portland metro citizens because the Interstate Bridge Replacement Program (IBR) team members are telling the community that there will be between 26,000 and 33,000 daily transit boardings on the I-5 corridor in 2045. This is likely designed to justify their proposal that $2 billion be spent on a 3-mile MAX light rail extension into Vancouver as part of their $7.5 billion proposal.

C-TRAN offers the only transit service over the Columbia River. The agency experienced a 61 percent drop in passenger boardings on its express bus system over the two years of pandemic lockdowns. The agency shared numbers for nine separate routes traveling over the river for the 2019 to 2021 years. In 2019, it had 1.4 million boardings which then declined to 555,000 in 2021..

Express Routes crossing the I-5 Bridge saw an average of just 523 daily boardings in 2022, C-TRAN shared https://www.clarkcountytoday.com/news/c-tran-2022-financial-results-show-improvement/ with Clark County Today. Express Routes crossing the I-205 bridge saw an average of 273 daily boardings. Overall, C-TRAN carried 14.5 people per hour of service across their entire bus network in 2022, according to its annual report https://www.c-tran.com/images/CAFR/c-tran_2022_acfr.pdf.

For the IBR transit projections to be accurate, daily ridership on the I-5 corridor would have to increase fifty-fold to reach their 26,000 number. It would have to increase 63 times to reach the 33,000 number.”

“With over one quarter of the $7.5 billion project being the 3-mile light rail extension, and the price tag of the project scheduled to increase according to Johnson, one might wonder why they don’t consider the cheaper and more flexible alternative of buses. C-TRAN has built two Bus Rapid Transit lines for $50 million each, a small fraction of the $2 billion cost of extending light rail. Furthermore, it would eliminate the “new revenues” (aka taxes) TriMet is demanding from both states for the operations and maintenance of the light rail into Clark County.

Nationally and locally, transit ridership remains significantly depressed. As more people work from home, others seek to work in suburbs instead of downtown.”

“The Cascade Policy Institute has documented multiple broken promises by TriMet https://www.clarkcountytoday.com/news/trimets-broken-promises-on-getting-people-to-use-transit/, when it comes to the MAX light rail service. Every time they have failed to meet those promised levels of service or passengers being carried.

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‘With one out of eight people working from home, is there a need for any “high capacity” mass transit over the Columbia River? National and local ridership trends indicate the answer is no.”

Source: Report at Clark County Today on CTRAN and TriMet ridership data

https://www.clarkcountytoday.com/news/national-and-local-transit-ridership-down-significantly-feds-report/

CRC forecasts on ridership have not materialized. These forecasts seem inaccurate and unrealistic, like CRC was.

Margaret Tweet, Camas 98607

IBR Draft SEIS - RECORD #3853 DETAIL

First Name :	Margaret
Last Name :	Tweet
Attachments :	DSEIS-3583_Tweet_Original.pdf (34 kb)

IBR Draft SEIS - RECORD #3853 DETAIL

Submission Date : 12/6/2024
First Name : Margaret
Last Name : Tweet
Business/Organization/Agency :

Submission Input :

Resubmitted by Margaret Tweet, Camas, 98607, hyperlinks removed,(web address retained without hyperlink) added a safety article related to long flights of stairs

IBR program shared that there were 370 active transportation trips a day over the bridge versus 184,400 with all other modes in a graph dated Nov 23, 2021.

The DSEIS states “an estimated 410 bicyclists and pedestrians, on average, make trips across the bridge daily.”

Why the increase in estimate? Where is the data to support this? Is it based on video of Bridge activity?

I have never seen that kind of foot and bicycle traffic, on average across the I-5 bridge. So many rainy,strong windy days over the Columbia River deter bicyclists and pedestrians.

As described in Chapter 2, there are three site options for a new park and ride facility near the proposed Waterfront Station. Two of these sites (Sites 2 and 3) would require the acquisition of additional property beyond that needed for the highway and transit facilities. Site 2 would require full acquisition of one commercial parcel and no displacements. Site 3 would require full acquisition of four commercial parcels and displacement of one business. Site 1 would not require any acquisitions or displacements. Property impacts associated with the Waterfront Station park-and-ride options are shown in Table 3.3-4 and are in addition to the impacts identified in Table 3.3-3.

My comment: Minimize impacts to residential and businesses, use buses instead of light rail. Also minimize park and ride space since few transit riders, especially during pandemics.

With the height of the Waterfront Station~ 70-90 ft in the air, it seems unlikely residents will use it, so a Park and Ride near a tall station is likely not needed. Going up and down a long spiral staircase can be done by a limited group with physical capacity. How many people are willing to risk meeting a hostile stranger 60-90 feet in the air who could push them down the stairs such as has happened in Seattle light rail station. Is there an elevator? physically possible, still risky. Parents and caregivers with children could be unlikely to take the risk. Older residents, seniors, familiar with the news reports of assaults on and near MAX stations seem unlikely to use light rail, even at ground level.

GRAPHIC: Brutal attack at Seattle transit station caught on camera, suspect arrested

Published: Mar. 15, 2022

https://www.fox19.com/2022/03/15/graphic-brutal-attack-seattle-transit-station-caught-camera-suspect-arrested/

SEATTLE (KING) - A brutal attack was caught on camera at a Seattle transit station earlier this month.

The incident happened on March 2 at the International District light rail station near downtown.

Video shows a man, later identified by police as Alexander Jay, coming up an escalator with a woman in a red jacket taking the stairs while exiting the station.

However, when the two arrive at the top, Jay is seen holding the woman on the ground by her coat shortly after disappearing from the camera's view. He then throws her down the first flight of stairs.

The attack continues with Jay following the woman to the first landing on the stairs. Video shows him grabbing her again and throwing her down the next section of stairs.

Jay turns around but then follows the woman as she tries to get away, and a struggle ensues on the second landing.

The woman can be seen holding onto the railing before finally escaping Jay and walking back down to the train platform.

The entire attack lasted under a minute, but the woman had surgery after suffering three broken ribs and a broken clavicle.

Officers with the Seattle Police Department were able to catch Jay a day after the attack. He is facing charges of second-degree assault, and prosecutors have requested $150,000 bail.

Jay is scheduled for an initial court appearance on March 24.

At a recent RTC meeting in Vancouver fall of 2024, an IBR presentation was made by Mr. Johnson, and it was suggested that public comments about crime on and around MAX Lightrail stations and trains would not be considered by IBR. Why limit public input? This is a primary reason that many women, children, teens, older residents, physically challenged residents do not consider lightrail a safe transit option.

Following is not a complete list of public safety issues on and around TriMet MAX Lightrail stations and trains. There are many more reports, including murder in a MAX train. I did not find this kind of information in DSEIS documents.

MAX station shooting victim identified as 43-year-old Portland man

https://www.kptv.com/2022/07/06/max-station-shooting-victim-identified-43-year-old-portland-man/

Published: Jul. 6, 2022 by KPTV.com News article

Police say 43-year-old Lucian Thibodeaux, of Portland, was shot at a TriMet station in the 16100 block of East Burnside Street around 5 a.m.

Thibodeaux was taken to a local hospital but died the same day.

The suspect fled the scene and has not yet been located. Gresham P.D. says the investigation is still ongoing and has not released any suspect descriptions.

Victim killed in shooting near MAX platform identified, injured victim released from hospital

Published: Jul. 9, 2022 by KPTV.com News report

https://www.kptv.com/2022/07/09/victim-killed-shooting-near-max-platform-identified-injured-victim-released-hospital/

PORTLAND, Ore. (KPTV) - The victim in a deadly shooting in northeast Portland on Wednesday night has been identified and another injured victim has been released from the hospital.

The Portland Police Bureau said the victim who was shot and killed is 42-year-old Gladis Mendoza-Hernandez. The medical examiner conducted an autopsy and determined she died from a gunshot wound and ruled her death a homicide.

Just before 11:30 p.m. Wednesday, East Precinct officers responded to a shooting near the MAX platform at East Burnside Street and Northeast 148th Avenue. Officers arrived and found Mendoza-Hernandez dead.

Police said a man who had also been shot was located nearby. He has now been released from the hospital.

No arrests have been made and the investigation is ongoing.

Woman attacked, robbed at Parkrose Transit Station:

Updated: Mar. 30, 2018 KPTV.com News report

https://www.kptv.com/2018/03/30/woman-attacked-robbed-parkrose-transit-station-he-says-hes-going-kill-me/

PORTLAND, Ore. (KPTV) - A woman who was attacked and robbed in the middle of the afternoon at a MAX station in northeast Portland said the suspect threatened to kill her.

Police are searching for the suspect and TriMet is offering a reward in the case.

Portland police said officers responded to the Parkrose Transit Station on Monday at 2:37 p.m. after it was reported a woman was attacked and robbed.

Police said a suspect attacked a woman for several minutes while she tried to defend herself.

The woman was punched and kicked several times by the suspect and she was knocked to the ground, according to police.

The suspect then demanded money and the woman's ID.

The woman ultimately handed over $15 worth of $1 coins to the suspect.

During the attack, police said the suspect continually threatened the victim. Fortunately, she was not seriously injured.

"I was thinking this is not happening, this really is not happening," the victim told FOX 12 on Friday. "So, I was fending him off as far as I can. He was shouting, he says he's going to kill me, beat me."

Police described the suspect as a middle-aged white man who is 5 feet 6 inches tall and weighs 180 pounds. He is said to have scruffy brown hair and a white mustache.

During the robbery, police said the suspect was wearing a black and orange colored jacket with the San Francisco Giants baseball team monogram printed on it. The suspect had been riding the MAX Red Line prior to the attack and may be homeless. Police said he may frequent east or north Portland.

TriMet is offering a reward up to $1,000 for information that leads to the identity and arrest of the suspect.

Police are asking anyone with information on the suspect to contact transit officers at 503-962-7566

father says 2-year-old daughter was poked by needle on MAX train

Updated: Jan. 10, 2018 at 11:20 AM PST KPTV.com news report

https://www.kptv.com/2018/01/10/gresham-father-says-2-year-old-daughter-was-poked-by-needle-max-train/

PORTLAND, Ore. (KPTV) - A Gresham father says his 2-year-old daughter was poked by a hypodermic needle while riding a MAX train.

Brian Higby told FOX 12 that on Tuesday his family was taking the MAX Green Line from Clackamas Town Center to Gateway Transit Center when he heard his daughter say “owie.”

Higby says he looked down at his daughter, who was in his wife’s arms, and saw she was holding a syringe in her hand. He says he believed the needle poked her and immediately got the needle out of her reach.

At the next stop, they got out to seek medical help at Providence Immediate Care, who then transferred them to Randall Children’s Hospital. At Randall Children’s Hospital, tests were done on the syringe and on the 2-year-old girl.

Luckily, the little girl is fine but they still waiting on some long-term tests results and hope those come back clear too.

Looking back, Higby says it was a moment of total fear.

“Total hopelessness, you know, helpless. There was no control of it.”

Right now, Transit Police are investigating and reviewing video of the incident. But finding needles everywhere is becoming a scary trend.

Clean & Safe found more than 16,000 needles in downtown Portland in 2016.

TriMet officials say they see this problem on their trains and buses too, and it’s not uncommon to find hypodermic needles when they clean their vehicles every night.

They encourage everyone to check before taking a seat, and urge that if anyone see’s something, tell a TriMet employee right away.

MAX train rapist sentenced to prison for 2021 assault Dec. 5, 2022

Published: Dec. 5, 2022 KPTV.com news article

https://www.kptv.com/2022/12/06/max-train-rapist-sentenced-prison-2021-assault/

HILLSBORO Ore. (KPTV) – A man accused of sexually assaulting a woman at a Beaverton MAX stop pleaded guilty to all charges Monday, according to the Washington County District Attorney’s Office.

The charges stem from an incident in June 2021. According to the D.A.'s Office, a 31-year-old woman was getting off the MAX train at the Beaverton Creek station just after midnight when William Wesley Gilchrist, 40, began following her. Gilchrist reportedly began attacking her from behind, and sexually assaulting her.

Two good Samaritans saw the attack and pulled Gilchrist off. He then threatened both men with a knife before running off into the woods near the Nike campus. Arriving police soon found Gilchrist and took him into custody.

According to the D.A.'s Office, Gilchrist was under the influence of methamphetamine.

Gilchrist pleaded guilty Monday to first-degree unlawful sexual penetration and two counts of unlawful use of a weapon. Gilchrist was sentenced to 100 months in prison and will be required to register as a sex offender and serve a term of post-prison supervision after his release, officials said.

MAX train passenger with knife arrested after becoming verbally aggressive

Published: Aug. 11, 2022 kptv.com news article

https://www.kptv.com/2022/08/11/max-train-passenger-with-knife-arrested-after-becoming-verbally-aggressive-police/

PORTLAND Ore. (KPTV) - A MAX train passenger was cited for disorderly conduct on Thursday after police say they became verbally aggressive on the train.

Communications Coordinator for the Multnomah County Sheriff's Office told FOX 12 in a statement that a knife was seen on the passenger but it was not used in a threatening way.

The incident happened around 1 p.m. near the 600 block of South Porter Street.

MAX deadly shooting likely self defense

Published: 5:49 AM PST December 5, 2013 KPTV.com news article

https://www.kgw.com/article/news/max-deadly-shooting-likely-self-defense/283-71630580

PORTLAND New video and testimony shows the suspect charged with murder for an October Southeast Portland MAX station shooting was likely acting in self defense.

Court documents show a grand jury declined to indict 18-year-old in the Oct. 11 shooting that killed a teen and injured another man at the Holgate station.

Velasquez was originally arrested in late October on murder, attempted murder, unlawful use of a weapon and first-degree assault charges.

According to a grand jury indictment obtained by KGW's newspartner the Oregonian, Velasquez was seen in surveillance video smoking a cigarette near the top of the stairs with his girlfriend around 11:45 p.m. on the night of the shooting.

A man wearing a mask then came up the stairs and passed them. Then, two other men, later identified as 15-year-old Abukar Madey and 23-year-old Alejandro Ramirez-Navarro (also known as Alex Ramirez), joined the masked man and approached Velasquez from behind, the documents show.

Velasquez told Multnomah County Deputy District Attorney Kirsten Snowden that Ramirez tried to start a fight and asked about his gang affiliations. Velasquez said he felt threatened, so he adjusted a gun hidden in his waistband in order to get the men to leave them alone…

The video then reportedly shows Ramirez pointing the rifle directly at Velasquez as Madey is seen pulling out a sawed-off pistol grip shotgun from his front pocket and pointing it at Velasquez and Grimm.

Velasquez told Snowden that Ramirez jabbed him in the chest with the rifle, and after a while, he put it back in the guitar case and Madey put his sawed-off shotgun in his pocket, documents show.

Video shows the three men surround Velasquez and Grimm while Ramirez hands his jacket to Madey and assumes an aggressive posture, the indictment says. That's when the masked man is seen coming from the left and punching Velasquez twice in the face.

Velasquez said he feared for his life and thought he and his girlfriend were going to be killed or seriously injured, so he pulled out his gun and fired at the three men until he was out of ammunition, documents show.

That evening, police swarmed to the MAX station at Southeast 92nd and Southeast Holgate and found Madey dead on the stairs with a gunshot wound to the head.

Ramirez was also found shot several times and taken to the hospital and survived.

Police told KGWin October that Ramirez was a member of a Hispanic street gang in Portland.

Man shot during fight on MAX Green Line train in SE Portland

Updated: 10:10 PM PST March 3, 2022 kgw.com news article

https://www.kgw.com/article/news/crime/one-person-shot-max-green-line/283-6e2d5b3c-4257-4072-893e-f9b662552760

PORTLAND, Ore. — A man was shot https://www.kgw.com/crime during a fight on a MAX Green Line train in Southeast Portland Thursday evening.

In a news release, Portland police said officers were dispatched at 6:52 p.m. to a report of a fight on a MAX train at the Main Street Transit station on Southeast 96th Avenue. As officers were responding, they learned someone fired a gun. Arriving officers found a man with a gunshot wound. He was taken to a hospital with non-life threatening injuries.

Police said the suspect reportedly had a gun and left the scene and was not immediately located. They have not released a suspect description.

A witness told KGW the shooting happened during a confrontation over a dog. A person reportedly punched the dog in the snout then pulled a knife. That's when the witness said the dog's owner pulled out a gun and shot the other person.

In an email, a TriMet spokesperson said, "Our thoughts go out to the individual who was shot, and we sincerely hope they make a full recovery."

TriMet said shuttle buses were being used to serve MAX Green Line stations between Gateway/NE 99th Ave Transit Center and Clackamas Town Center Transit Center.

The Portland Police Bureau is handling the investigation.

Anyone with information about the incident is asked to contact crimetips@portlandoregon.gov and reference case number 22-58707. Anonymous tips can also be sent to Crime Stoppers of Oregon, which offers cash rewards of up to $2,500 for information that leads to an arrest in any unsolved felony crimes.

Police investigate two incidents, 48 hours apart, of MAX trains hitting people

Published: May. 16, 2022 kptv.com news article

https://www.kptv.com/2022/05/16/police-investigate-two-incidents-48-hours-apart-max-trains-hitting-people/

PORTLAND Ore. (KPTV) - The Portland Police Major Crash Team is investigating two incidents happening two days apart involving max trains hitting people. One incident was deadly, the other is critical.

The latest accident happened just after 9 p.m. Sunday at Northeast 82nd Avenue and Jonesmore Street. Police got a call about a person with life-threatening injuries. The injured person was taken to the hospital but there is still no word on their condition.

The station where the incident happened was closed overnight while police investigated. It has since been opened. About 48 hours earlier, another person died after being hit by a MAX train at East Burnside and 160th Avenue.

Trimet officials said they believe the victim was on the tracks, and not one of the nearby platforms, when it happened at around 10:30 p.m. on Friday. Trimet says these accidents are difficult for everyone involved, including the train’s operator. “Our thoughts are with our operator who has been removed from the scene here and is getting the help they need from TriMet to work through this.

Police have not released much more information on the person who was hit or why they were on the tracks. The Portland police major crash team is investigating these accidents, and are asking if you know anything about what happened either at NE 82nd and Jonesmore Sunday or the one Friday night on NE 160th and Burnside, to call police.

MAX train hits pedestrian in Northeast Portland

Kgw.com Updated: 8:57 AM PDT May 16, 2022

https://www.kgw.com/article/news/local/max-train-hits-pedestrian-northeast-portland/283-2ac06b7b-3f92-4020-9db5-db842a22d942

PORTLAND, Ore. — Police are investigating a crash involving a pedestrian and a MAX train in Northeast Portland Sunday evening.

Officers responded to the incident around 9:02 p.m. near Northeast Jonesmore Street and Northeast 82nd Avenue. The Portland Police Bureau (PPB) said the pedestrian was taken to the hospital with life-threatening injuries.

The incident marked the second crash involving a MAX train and a pedestrian in Portland the past week. On May 13, a MAX train hit and killed a pedestrian around 10:30 p.m. near Northeast 160th and Burnside Street. PPB later identified the pedestrian as 43-year-old Phillip Allen. Anyone with information about the crash on May 15 is asked to contact the Traffic Investigations Unit at crimetips@portlandoregon.gov and reference case number 22-128626, or call (503)823-2103.

2 teens stabbed on MAX train; Man charged with hate crime is wanted by Florida: Court docs Updated: Sep. 3, 2023

https://www.kptv.com/2023/09/04/2-teens-stabbed-max-train-man-charged-with-hate-crime-is-wanted-by-florida-court-docs/

(KPTV) - Two teenagers were stabbed and injured on a TriMet MAX train, and the suspect was arrested in southeast Portland Saturday evening, according to Portland police.

According to court documents accessed by FOX 12 on Sunday, the suspect, identified as 25-year-old Adrian Cummins, is facing charges for a previous altercation on TriMet property in April. He is also wanted by the state of Florida for probation violation.

Just before 6 p.m. Saturday, police responded to a report of a stabbing on the TriMet platform at 9598

Southeast Flavel Street. When they arrived, they found two 17-year-old boys suffering from injuries.

One teen was taken to the hospital by ambulance, the other turned down an ambulance ride and was given medical treatment at the scene. Both are expected to recover from their injuries.

After an initial investigation, police said they believe the assault began on the MAX train, and then the victims and suspect left the train at the Flavel Street station.

According to court documents, the two victims were riding the MAX when Cummins, dressed in all-black and a sweatshirt that read ‘Villain’ in white letters, jumped up and shouted ********

Cummins then proceeded to stab one of the victims in the left arm and the other in the upper left chest, nicking his heart according to the hospital.

Police began to search for the suspect, later identified as Cummins, and about six minutes later, officers found a man matching his description at Southeast 92nd Avenue and Southeast Flavel Street. Cummins then ran from police on foot, but officers caught up and arrested him.

Police said they believe Cummins stabbed the boys because of his “perception of their race.”

Cummins was also identified as the suspect in an armed robbery with a knife at a convenience store in the 9100 block of Southeast Flavel Street. There were no injuries in the robbery.

According to court documents, investigators allege that in April, Cummins was involved in a fight on a MAX train which ended on TriMet property near Southwest Second Avenue and Yamhill Street. During the fight a gun fell out, leading to charges of for felon in possession of a firearm, as investigators say Cummins is a convicted felon from Florida.

Cummins was booked at the Multnomah County jail on the following charges:

- First-degree assault

- Second-degree assault

· Two counts of first-degree bias crime

· First-degree robbery

Court docs: Suspect killed man in unprovoked attack on MAX train

Published: Apr. 1, 2024 at 1:40 PM PDT KPTV news report

https://www.kptv.com/2024/04/01/court-docs-suspect-killed-man-unprovoked-attack-max-train/

PORTLAND Ore. (KPTV) - A 51-year-old man has been charged with second-degree murder in connection with an unprovoked deadly stabbing on a Portland MAX train on Friday, March 29, according to a probable cause affidavit from Portland Police.

Shondel L. Larkin was charged with the attack, which took place on an eastbound MAX train Friday evening. He was arrested at the scene after police found him inside the train with a knife and what appeared to be blood on his clothes.

Police arrived at the 82nd Avenue Transit Center around 6:00 p.m. Friday to find the victim suffering from multiple stab wounds. He died at the scene. The attack appeared to be unprovoked, based on security footage from inside the train viewed by police.

Victim in Gresham MAX station shooting has died, Gresham P.D. says Jul. 1, 2022

https://www.kptv.com/2022/07/01/1-person-injured-shooting-near-gresham-max-station-trimet-blue-line-service-disrupted/

(KPTV) - The Gresham Police Department has confirmed a man shot early Friday morning has died.

Just after 5 a.m., officers responded to a reported shooting at a TriMet station in the 16100 block of East Burnside Street. Police said two men were on the westbound MAX platform when one shot the other. The victim was taken to an area hospital for treatment.

The suspect fled the scene and has not yet been located. Police have not yet released a description of the suspect. The case is now being treated as a homicide investigation.

Woman found guilty of pushing toddler onto train tracks in Portland

Published: Jan. 31, 2024 kptv.com news report

https://www.kptv.com/2024/02/01/woman-found-guilty-after-pushing-toddler-onto-train-tracks/

PORTLAND Ore. (KPTV) - Brianna L. Workman, 33, has been found guilty of pushing a three-year-old onto train tracks in 2022.

On Wednesday, Workman was found guilty on all five previously indicted charges and has been placed under the jurisdiction of the Psychiatric Security Review Board (PSRB) for care, custody, and treatment for a maximum of ten years.

A mother and child were waiting for a MAX train when Workman shoved the child, who was three at the time, off of the platform and face-first onto the train tracks without warning or provocation. The child landed face-first onto the metal rail and rocks before she was quickly rescued. The toddler reported a severe headache and had a small red mark on their forehead. The incident was captured on Tri-Met surveillance.

The charges are one count of Attempted Assault in the First Degree, one count of Assault in the Third Degree, one count of Interfering with Public Transportation, one count of Disorderly Conduct in the Second Degree, and one count of Recklessly Endangering Another Person.

She will be taken to the Oregon State Hospital under PSRB jurisdiction.

Man smashes MAX train passenger in the face with rock

Mar. 8, 2023 kptv.com news report

https://www.kptv.com/2023/03/08/man-smashes-max-passenger-face-with-rock-court-docs/

Newly released court documents reveal that a man smashed one passenger in the face with a rock on a MAX train. Johnny Moan is named as the suspect in the assault in the affidavit, which was filed on March 7.

Moan was spotted throwing rocks at trains near Northeast Sandy and 33rd, according to the documents. When police arrived in the area they tried to find Moan, while receiving additional calls over the course of 90 minutes as he moved around and allegedly damaged more TriMet property.

Law enforcement then received a report around 3:30 p.m. that Moan had just assaulted someone on a MAX train in the Lloyd Center Transit Station. A deputy found and spoke with the male victim, who was dizzy and had multiple injuries on his face, including “redness, swelling, and blood.”

He was riding on the MAX when he noticed Moan yelling at a female passenger while holding a rock, according to the document. The woman appeared “terrified,” so the victim pulled out his phone and got up to assist her. When Moan saw this he approached him and allegedly punched him in the face. When the victim attempted to exit the MAX train, Moan allegedly pursued him and smacked him in the face with a rock. Moan then exited the train and hurled the rock at a train window, causing the glass to crack.

These events were confirmed by a witness on the train and police were able to locate Moan using CTV footage. When When they found Moan at Northeast 6th and Hassalo Street, Moan reportedly told police “You know I did that s--- on camera.”

Police arrested Moan and the witness allegedly told them he was “100%” the attacker on the MAX.

Man gets prison for threatening MAX train driver with knife, yelling Asian slurs

Jun. 21, 2024 (KPTV) - A man was sentenced to 15 months in prison this week for threatening a MAX train driver with a knife and using derogatory comments against the employee.

https://www.kptv.com/2024/06/21/man-gets-prison-threatening-max-train-driver-with-knife-yelling-asian-slurs/

Family of man killed on MAX train files wrongful death lawsuit against TriMet

Published: Oct. 23, 2024 kptv.com news report

https://www.kptv.com/2024/10/23/family-man-killed-max-train-files-wrongful-death-lawsuit-against-trimet/

PORTLAND, Ore. (KPTV) - A family is now suing TriMet after a father of two was killed on a MAX train, saying his death could've been prevented.

In the six-page wrongful death lawsuit, the family of Michael Brady claims TriMet officials knew about the ongoing violence on the trains and knew about it long before Brady was killed, but they didn't do enough to prevent it. In March, 51-year-old Brady was stabbed to death on a MAX train while riding home from work to have dinner with his wife and children. Portland police say Brady didn't know the man who killed him and it was a random attack.

The suspect, Shondel Larkin, was arrested at the scene and is facing second-degree and unlawful use of a weapon charges.

Now, Brady's family is suing TriMet, saying his death could have been prevented if there were adequate security measures and personnel in place.

The lawsuit states TriMet fails to warn passengers about the risk of violence on its trains and that "TriMet failed to provide adequate security or mobile crisis teams to deter violence and safeguard its passengers from the foreseeable danger posed by violence individuals that TriMet knew and should have known were frequently on its MAX trains."

The suit also claims TriMet encourages locals to ride the trains even though "a Portland commissioner recently announced that he too will no longer ride TriMet's MAX trains, citing unaddressed safety concerns."

That's in reference to Commissioner Rene Gonzalez who said he would temporarily stop riding public transportation in Portland after he claims he was confronted on a MAX train in January.

The family claims if there was proper warning to passengers, like Brady, he would've taken a different way home and would've made it home to dinner with his family.

> On 11/26/2024 4:06 PM PST Draft SEIS <draftseis@interstatebridge.org> wrote:
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> Hello,
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> We noticed that your submission contains at least one hyperlink. As stated on the Draft SEIS webpage https://www.interstatebridge.org/updates-folder/supplemental-environmental-impact-statement/#comment:~:text=as%20formal%20comments.-,To%20ensure%20the,-administrative%20record%20accurately (see excerpt below), we cannot accept hyperlinked information as part of the comment submission. If you would like to include the hyperlinked information in your comment, please resubmit it with the information attached or included as part of the text by the end of November 28. Otherwise, we will respond to the text as written and will not review the hyperlinked information. This policy ensures that our records accurately reflect the information you intend to include, as hyperlinks can often change, be incorrectly linked, or be broken. We appreciate your understanding.
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> Comments submitted through social media and informal conversations will not be recorded as formal comments. To ensure the administrative record accurately and completely reflects the documentation received during the public comment period, written comments should not include any hyperlinks to outside materials or information. Any materials or information the commenter wishes to have considered should be included within the submitted comment. Attachments to e-mails must be specifically referenced in the comment text, including specific citations to page number and passage from the attachments. All audio/video attachments must be transcribed or submitted via the Draft SEIS voicemail line.
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> To help us understand your interests and concerns, we recommend being specific and including details where possible. For example: “The analysis should consider potential effects from XYZ” or “I would like to see additional mitigation for XYZ.”
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> Sincerely,
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> Interstate Bridge Replacement Program
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> From: [redacted]
> Sent: Tuesday, November 19, 2024 12:00 AM
> To: Draft SEIS <draftseis@interstatebridge.org>
> Subject: Fwd: Draft SEIS public comment
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> Margaret Tweet Camas 98607
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> >
> > ---------- Original Message ----------
> >
> > From: [redacted]
> >
> > To: "draftseis@interstatebridge.org mailto:draftseis@interstatebridge.org" <draftseis@interstatebridge.org mailto:draftseis@interstatebridge.org>
> >
> > Date: 11/18/2024 11:24 PM PST
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> > Subject: Draft SEIS public comment
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> > > IBR program shared that there were 370 active transportation trips a day over the bridge versus 184,400 with all other modes in a graph dated Nov 23, 2021.
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> > The DSEIS states “an estimated 410 bicyclists and pedestrians, on average, make trips across the bridge daily.”
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> > Where is the data to support this? Is it based on video of Bridge activity? Why the increase in estimate? I have never seen that kind of foot and bicycle traffic, on average. So many rainy,strong windy days over the Columbia River deter bicyclists and pedestrians.
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> > As described in Chapter 2, there are three site options for a new park and ride facility near the proposed Waterfront Station. Two of these sites (Sites 2 and 3) would require the acquisition of additional property beyond that needed for the highway and transit facilities. Site 2 would require full acquisition of one commercial parcel and no displacements. Site 3 would require full acquisition of four commercial parcels and displacement of one business. Site 1 would not require any acquisitions or displacements. Property impacts associated with the Waterfront Station park-and-ride options are shown in Table 3.3-4 and are in addition to the impacts identified in Table 3.3-3.
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> > My comment: With the height of the Waterfront Station~ 80-90 ft in the air, seems unlikely residents will use it, so a Park and Ride is likely not needed. Going up and down a long spiral staircase can be done by a limited group of people willing to risk meeting a hostile stranger. Is there an elevator? physically possible, still risky. Parents and caregivers with children unlikely to take the risk. Older residents familiar with the news reports of assaults on and near MAX stations seem unlikely to use light rail, even at ground level.
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> > At a recent RTC meeting in Vancouver, an IBR presentation was made, and it was suggested that public comments about crime on and around MAX Lightrail stations and trains would not be considered by IBR. Why limit public input ? This is a primary reason that many women, children, teens, older residents, physically challenged residents do not consider lightrail a safe transit option.
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> > Following is not a complete list of public safety issues on and around TriMet MAX Lightrail stations and trains.
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> > https://www.kptv.com/2022/07/06/max-station-shooting-victim-identified-43-year-old-portland-man/
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> > Published: Jul. 6, 2022
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> > Police say 43-year-old Lucian Thibodeaux, of Portland, was shot at a TriMet station in the 16100 block of East Burnside Street around 5 a.m.
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> > Thibodeaux was taken to a local hospital but died from the same day.
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> > Victim killed in shooting near MAX platform identified, injured victim released from hospital
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> > Published: Jul. 9, 2022
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> > https://www.kptv.com/2022/07/09/victim-killed-shooting-near-max-platform-identified-injured-victim-released-hospital/
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> > Just before 11:30 p.m. Wednesday, East Precinct officers responded to a shooting near the MAX platform at East Burnside Street and Northeast 148th Avenue. Officers arrived and found Mendoza-Hernandez dead.
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> > Woman attacked, robbed at Parkrose Transit Station:
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> > https://www.kptv.com/2018/03/30/woman-attacked-robbed-parkrose-transit-station-he-says-hes-going-kill-me/
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> > Portland police said officers responded to the Parkrose Transit Station on Monday at 2:37 p.m. after it was reported a woman was attacked and robbed.
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> > The woman was punched and kicked several times by the suspect and she was knocked to the ground, according to police.
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> > father says 2-year-old daughter was poked by needle on MAX train
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> > Updated: Jan. 10, 2018 at 11:20 AM PST
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> >
> > https://www.kptv.com/2018/01/10/gresham-father-says-2-year-old-daughter-was-poked-by-needle-max-train/
> >
> >
> >
> > TriMet officials say they see this problem on their trains and buses too, and it’s not uncommon to find hypodermic needles when they clean their vehicles every night.
> >
> >
> >
> > They encourage everyone to check before taking a seat, and urge that if anyone see’s something, tell a TriMet employee right away.
> >
> >
> >
> > MAX train rapist sentenced to prison for 2021 assault
> >
> >
> >
> > (KPTV) – A man accused of sexually assaulting a woman at a Beaverton MAX stop pleaded guilty to all charges Monday, according to the Washington County District Attorney’s Office.
> >
> >
> >
> > The charges stem from an incident in June 2021. According to the D.A.’s Office, a 31-year-old woman was getting off the MAX train at the Beaverton Creek station just after midnight when William Wesley Gilchrist, 40, began following her. Gilchrist reportedly began attacking her from behind, and sexually assaulting her.
> >
> >
> >
> > https://www.kptv.com/2022/12/06/max-train-rapist-sentenced-prison-2021-assault/
> >
> >
> >
> > MAX train passenger with knife arrested after becoming verbally aggressive
> >
> > Published: Aug. 11, 2022
> >
> >

> >
> > https://www.kptv.com/2022/08/11/max-train-passenger-with-knife-arrested-after-becoming-verbally-aggressive-police/
> >
> >
> >
> >
> >
> >
> > MAX deadly shooting likely self defense
> >
> >
> > https://www.kgw.com/article/news/max-deadly-shooting-likely-self-defense/283-71630580
> >
> >
> > Man shot during fight on MAX Green Line train in SE Portland
> >
> >
> > https://www.kgw.com/article/news/crime/one-person-shot-max-green-line/283-6e2d5b3c-4257-4072-893e-f9b662552760
> >
> > Updated: 10:10 PM PST March 3, 2022
> >
> >
> >
> > A man was shot https://www.kgw.com/crime during a fight on a MAX Green Line train in Southeast Portland Thursday evening.
> >
> >
> >
> >
> >
> >
> > Police investigate two incidents, 48 hours apart, of MAX trains hitting people
> >
> >
> > Published: May. 16, 2022
> >
> >
> > https://www.kptv.com/2022/05/16/police-investigate-two-incidents-48-hours-apart-max-trains-hitting-people/
> >
> >
> > MAX train hits pedestrian in Northeast Portland
> >

> >
> > The incident marked the second crash involving a MAX train and a pedestrian in Portland the past week. On May 13, a MAX train hit and killed a pedestrian around 10:30 p.m. near Northeast 160th and Burnside Street. PPB later identified the pedestrian as 43-year-old Phillip Allen. https://www.kgw.com/article/news/local/max-train-hits-pedestrian-northeast-portland/283-2ac06b7b-3f92-4020-9db5-db842a22d942 https://www.kgw.com/article/news/local/max-train-hits-pedestrian-northeast-portland/283-2ac06b7b-3f92-4020-9db5-db842a22d942
> >
> >
> > 2 teens stabbed on MAX train; Updated: Sep. 3, 2023
> >
> >
> > (KPTV) - Two teenagers were stabbed and injured on a TriMet MAX train, and the suspect was arrested in southeast Portland Saturday evening, according to Portland police. https://www.kptv.com/2023/09/04/2-teens-stabbed-max-train-man-charged-with-hate-crime-is-wanted-by-florida-court-docs/ https://www.kptv.com/2023/09/04/2-teens-stabbed-max-train-man-charged-with-hate-crime-is-wanted-by-florida-court-docs/
> >
> > Published: Apr. 1, 2024 at 1:40 PM PDT
> >
> >
> >
> > PORTLAND Ore. (KPTV) - A 51-year-old man has been charged with second-degree murder in connection with an unprovoked deadly stabbing on a Portland MAX train on Friday, March 29, according to a probable cause affidavit from Portland Police. Shondel L. Larkin was charged with the attack, which took place on an eastbound MAX train Friday evening. He was arrested at the scene after police found him inside the train with a knife and what appeared to be blood on his clothes. https://www.kptv.com/2024/04/01/court-docs-suspect-killed-man-unprovoked-attack-max-train/ https://www.kptv.com/2024/04/01/court-docs-suspect-killed-man-unprovoked-attack-max-train/
> >
> >
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> >
> > Woman found guilty of pushing toddler onto train tracks in Portland
> >
> >
> > (KPTV) - A mother and child were waiting for a MAX train when Workman shoved the child, who was three at the time, off of the platform and face-first onto the train tracks without warning or provocation. Full story https://www.kptv.com/2024/02/01/woman-found-guilty-after-pushing-toddler-onto-train-tracks/ https://www.kptv.com/2024/02/01/woman-found-guilty-after-pushing-toddler-onto-train-tracks/
> >
> >
> > Man smashes MAX train passenger in the face with rock Mar. 8, 2023
> >

> >
> > Newly released court documents reveal that a man smashed one passenger in the face with a rock on a MAX train… He was riding on the MAX when he noticed Moan yelling at a female passenger while holding a rock, according to the document. The woman appeared “terrified,” so the victim pulled out his phone and got up to assist her. Full story https://www.kptv.com/2023/03/08/man-smashes-max-passenger-face-with-rock-court-docs/ https://www.kptv.com/2023/03/08/man-smashes-max-passenger-face-with-rock-court-docs/
> >
> >
> > Man gets prison for threatening MAX train driver with knife, yelling Asian slurs
> >
> > Jun. 21, 2024 (KPTV) - A man was sentenced to 15 months in prison this week for threatening a MAX train driver with a knife and using derogatory comments against the employee.https://www.kptv.com/2024/06/21/man-gets-prison-threatening-max-train-driver-with-knife-yelling-asian-slurs/
> >
> >
> >
> >
> > Family of man killed on MAX train files wrongful death lawsuit against TriMet
> >
> >
> > In the six-page wrongful death lawsuit, the family of Michael Brady claims TriMet officials knew about the ongoing violence on the trains and knew about it long before Brady was killed, but they didn’t do enough to prevent it. In March, 51-year-old Brady was stabbed to death on a MAX train while riding home from work to have dinner with his wife and children. Full story https://www.kptv.com/2024/10/23/family-man-killed-max-train-files-wrongful-death-lawsuit-against-trimet/ https://www.kptv.com/2024/10/23/family-man-killed-max-train-files-wrongful-death-lawsuit-against-trimet/
> >
> >
>

IBR Draft SEIS - RECORD #3857 DETAIL

First Name :	Mary
Last Name :	Lewis
Attachments :	DSEIS-3857_Lewis_Original.pdf (2 kb)

IBR Draft SEIS - RECORD #3857 DETAIL

Submission Date : 12/6/2024
First Name : Mary
Last Name : Lewis
Business/Organization/Agency :

Submission Input :

In my opinion, an article from Cascade Policy Institute, entitled Replacing The I-5 bridge is Not a Solution For Anything, states the best option for the crossing(s) of the Columbia River.

An excerpt from the article succinctly states a solution for this contested crossing:

"The Interstate Bridge should be left alone for now, and ODOT should be directed to start planning for two new bridges – one upstream from the Glenn Jackson I-205 Bridge, and one downstream from the I-5 Interstate Bridge. The new crossings would eliminate most congestion on the existing bridges, while providing essential redundancy in the event of a catastrophic earthquake.

We especially need a new Columbia River bridge with a direct connection to Highway 26 near Hillsboro. Not only would this reduce the total amount of driving for thousands of Westside motorists – who now have to drive to Portland just to get to Vancouver – it would provide much-needed congestion relief at three current bottlenecks: the Sylvan hills tunnels on HW 26, the Fremont Bridge, and I-5 in North Portland.

Planners and their political allies seem to be missing a central truth about river-based cities: they need lots of bridge crossings. In downtown Portland, we have two interstate highway bridges over the Willamette River, plus many local crossings including the Burnside, Steel, Morrison and Hawthorne bridges.

Each crossing serves a market and is necessary for the proper functioning of the city. If we applied ODOT’s logic for the IBRP, we’d tear down all the local Willamette River bridges and just keep the Marquam and Fremont Bridges.

Of course, we’re not going to do that because it would be insane. But it’s considered brilliant planning for the Columbia River."

IBR Draft SEIS - RECORD #3859 DETAIL

First Name :	Maria (Dolly)
Last Name :	Horlton
Attachments :	DSEIS-3859_Horlton_Original.pdf (617 kb)

Interstate Bridge Replacement Program
500 Broadway, Suite 200
Vancouver WA 98660

DRAFT SEIS PUBLIC COMMENT FORM

Public Comment must be submitted by 11:59 p.m. PST Monday, Nov. 18, 2024. Comments can be provided in your native language. Language interpretation and ASL services can also be made available upon request.

How to submit public comment:

- Online: https://www.interstatebridge.org/DraftSEIS
- Email: draftseis@interstatebridge.org. Please include "Draft SEIS public comment" in the subject line.
- Phone: 866-IBR-SEIS (427-7347)
- Mail: Interstate Bridge Replacement Program, *Attn*: Draft SEIS Public Comment
  500 Broadway, Suite 200, Vancouver WA 98660
- Public Hearings: Both in-person and virtual public hearing opportunities will be held. Visit our online calendar at https://www.interstatebridge.org/get-involved-folder/calendar/ to learn more.

*REQUIRED

Date* 11/8/24 (Dolly)

First Name* MARIA [redacted] **Last Name*** HORTON

Business or Organization

Email [redacted]

Phone Number

Address

City* [redacted] **State*** [redacted] **Zip Code*** [redacted]

Comment*

Yes, I would like a new bridge built because we need it and the one we have is old. It's practical to build a new one instead of maintaining or repairing at all time.

Continue next page

Comment

The type of bridge I would like would be the double level span. Because it would save time compare to the single level span or the removal style bridge. I like the idea of the double level span not only how it looks but it has a double purpose (car & LRT)

If more space is needed for public comment, please add additional pages.

IBR Draft SEIS - RECORD #3860 DETAIL

First Name :	Bernice
Last Name :	Bevard
Attachments :	DSEIS-3860_Bevard_Original.pdf (1 mb)

Interstate BRIDGE Replacement Program

Interstate Bridge Replacement Program
500 Broadway, Suite 200
Vancouver WA 98660

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*REQUIRED

Date* 11/8/24

First Name* BERNICE **Last Name*** BENAN

Business or Organization FILIPINO-AMERICAN ASSOC. OF VANCOUVER, WA

Email [redacted]

Phone Number

Address

City* [redacted] **State*** [redacted] **Zip Code*** [redacted]

Comment*

YES, I BELIEVE A NEW BRIDGE SHOULD BE BUILT. SINCE THE BRIDGE IS OVER 100 YEARS OLD, IT NEEDS TO BE REPLACED WITH ONE THAT IS DESIGNED WITH MODERN ENGINEERING TO WITHSTAND ENVIRONMENTAL IMPACT & POTENTIAL EARTHQUAKE PROOFING. ALSO, DUE TO THE INCREASE

Comment

IN THE POPULATION ON BOTH SIDES OF THE BRIDGE, IT IS NECESSARY TO INCREASE THE NUMBER OF LANES TO REDUCE THE CONGESTION ON THE BRIDGE. THIS IS SPECIELLY IMPORTANT FOR THOSE THAT COMMUTE M-F. IN TERMS OF THE DESIGN, MY PREFERENCE IS THE SINGLE LEVEL FIXED-SPAN, WHICH I LIKE IT BECAUSE A DRAW BRIDGE WILL NOT BE NECESSARY. THE DRAW BRIDGE DEFINITELY BACKS UP TRAFFIC WHEN IT NEEDS TO BE RAISED TO ACCOMMODATE RIVER TRAFFIC. ALSO, IN TERMS OF COST, I WOULD PREFER A BRIDGE THAT IS COST EFFICIENT. WE DON'T NEED A BRIDGE THAT IS AT THE TOP OF THE BUDGET. WE NEED ONE THAT IS FUNCTIONAL, BUT AT A COST THAT WILL NOT OVERBURDEN THE PEOPLE THAT WILL HAVE TO PAY THE TOLL IN ORDER TO USE IT.

If more space is needed for public comment, please add additional pages.

IBR Draft SEIS - RECORD #3861 DETAIL

First Name :	Enrico
Last Name :	Tadeo
Attachments :	DSEIS-3861_Tadeo_Original.pdf (438 kb) Enrico_Tadeo.pdf (371 kb)

Interstate BRIDGE Replacement Program

Interstate Bridge Replacement Program
500 Broadway, Suite 200
Vancouver WA 98660

DRAFT SEIS PUBLIC COMMENT FORM

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*REQUIRED

Date* 11/8/24

First Name* Enrico **Last Name*** TADEO

Business or Organization _____

Email [redacted]

Phone Number _____

Address _____

City* [redacted] **State*** [redacted] **Zip Code*** [redacted]

Comment*

- Yes to bridge
- more mass transit options, the better
- built ~~for~~ ~~plan~~ for future bullet train
- Plan for expected population 20 years from now.
- Build to be a tourist destination
- Double level is good for greater expanse

Interstate Bridge Replacement Program
500 Broadway, Suite 200
Vancouver WA 98660

DRAFT SEIS PUBLIC COMMENT FORM

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*REQUIRED

Date* 11/8/24

First Name* Enrico **Last Name*** TADEO

Business or Organization

Email enricotadeo0774@msn.com

Phone Number

Address

City* Vancouver **State*** WA **Zip Code*** 98665

Comment*

- Yes to bridge
- more mass transit options, the better
- built for future bullet train
- Plan for expected population 20 years from now.
- Build to be a tourist destination
- Double level is good for greater expanse

IBR Draft SEIS - RECORD #3862 DETAIL

First Name :	Bernie
Last Name :	Gerhardt
Attachments :	DSEIS-3862_Gerhardt_Original.pdf (655 kb) Bernie_Gerhardt.pdf (789 kb)

Interstate Bridge Replacement Program
500 Broadway, Suite 200
Vancouver WA 98660

DRAFT SEIS PUBLIC COMMENT FORM

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How to submit public comment:

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- Phone: 866-IBR-SEIS (427-7347)
- Mail: Interstate Bridge Replacement Program, *Attn*: Draft SEIS Public Comment
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*REQUIRED

Date* 11/8/24

First Name* Bernie **Last Name*** Gerhardt

Business or Organization Filipino American Association of Vancouver

Email [redacted]

Phone Number

Address

City* [redacted] **State*** [redacted] **Zip Code*** [redacted]

Comment*

I just found out that the bridge was built in 1917. That is very old!! Definitely the bridge needs to be replaced!! Safety should be the priority!!! Also, I am sure the bridge could not pass muster for today's requirements—

Comment

or seismic rules. I would like the double decker bridge. So the mode of transportation can be carried on even if one deck is blocked. I also like the river traffic can go under the bridge unimpeded and not disrupt traffic.

If more space is needed for public comment, please add additional pages.

Interstate Bridge Replacement Program
500 Broadway, Suite 200
Vancouver WA 98660

DRAFT SEIS PUBLIC COMMENT FORM

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  500 Broadway, Suite 200, Vancouver WA 98660
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*REQUIRED

Date* 11/8/24

First Name* Bernie **Last Name*** Gerhardt

Business or Organization Filipino American Association of Vancouver

Email ~~bmgerhardt~~ gerhardtbm@gmail.com

Phone Number _____

Address _____

City* Vancouver **State*** WA **Zip Code*** 98685

Comment*

I just found out that the bridge was built in 1917. That is very old!! Definitely the bridge needs to be replaced!! Safety should be the priority!!! Also, I am sure the bridge could not pass muster for today's requirements—

Comment

or seismic rules. I would like the double decker bridge. So the mode of transportation can be carried on even if one deck is blocked. I also like the river traffic can go under the bridge unimpeded and not disrupt traffic.

If more space is needed for public comment, please add additional pages.

IBR Draft SEIS - RECORD #3863 DETAIL

First Name :	Gretel
Last Name :	Ness
Attachments :	DSEIS_3863_Ness_LetterSize_Original.pdf (887 kb)

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500 Broadway, Suite 200
Vancouver WA 98660

DRAFT SEIS PUBLIC COMMENT FORM

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*REQUIRED

Date* 11/8/2024

First Name* GRETEL **Last Name*** NEIS

Business or Organization _____

Email [redacted]

Phone Number _____

Address _____

City* [redacted] **State*** [redacted] **Zip Code*** [redacted]

Comment*

I WOULD SUPPORT THE CONSTRUCTION OF A NEW I-5 BRIDGE BECAUSE IT IS NO LONGER SUSTAINABLE TO CONTINUE TO USE AND RELY ON THE OLD ONE. IT IS NOT SAFE. IT IS NOT LIKELY UP TO NEW SEISMIC AND EARTHQUAKE CODE REQUIREMENTS. GIVEN THE INCREASED POPULATION IN BOTH OREGON AND

WASHINGTON AND THE CORRESPONDING USAGE INCREASE, THE BRIDGE NEEDS TO BE ABLE TO ACCOMODATE INCREASED TRAFFIC AND THE USAGE TOLL IMPACTING THE BRIDGE. THIS AFFORDS EXTRA BACKUP TO I-205 BRIDGE AS W

I WOULD OPT FOR THE DOUBLE LEVEL SPAN. THIS IS SO THAT THE UPPER LEVEL COULD ACCOMMODATE CARS WHILE STILL HAVING A DEDICATED LOWER LEVEL FOR THE LRT. IT WOULD BE GOOD TO HAVE THE SEPARATION. THE FLOW OF TRAFFIC WOULD BE BETTER WITH MORE LANES THAN THE CURRENT ONE. IT WILL BE HIGH ENOUGH SO THAT WE DONT HAVE TO WORRY ABOUT HAVING THE MIDDLE PART ELEVATED, AVOIDING POTENTIAL MECHANICAL AND TECHNICAL ISSUES. THIS MAY ALSO BE LESS COSTLY THAN THE OTHER OPTIONS.

IMPOSING A TOLL MAY HELP LOWER THE NUMBER OF USERS AS WELL. IT MAY EVEN INCREASE USE OF PUBLIC TRANSPORTATION AS AN ALTERNATIVE.

IBR Draft SEIS - RECORD #3864 DETAIL

First Name :	Francis
Last Name :	Guevara
Attachments :	DSEIS-3864_Guevara_Original.pdf (617 kb)

Interstate BRIDGE Replacement Program

Interstate Bridge Replacement Program
500 Broadway, Suite 200
Vancouver WA 98660

DRAFT SEIS PUBLIC COMMENT FORM

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*REQUIRED

Date* 11/8/2024

First Name* FRANCIS **Last Name*** GUEVARA

Business or Organization Fillpino American Association Vancouver WA

Email [redacted]

Phone Number [redacted]

Address

City* [redacted] **State*** [redacted] **Zip Code*** [redacted]

Comment*

Yes I would like to see a new bridge ~~is also~~ It will help with traffic and increase of population in both Oregon & Washington. Double level span is the one I prefer. Looks more effiecient. Current I205 & I5 bridge are most of the time, congested. I drive everyday from Vancouver WA to Portland OR &

vice versa going to & from home & work.
I also like the idea of the toll to help make our roads better. For example, I like the roads in Florida As example of having tolls & good road conditions.
I think adding a new interstate bridge will help both OR. & WA States including all that drive through here. will help increase businesses & economy as a whole.

If more space is needed for public comment, please add additional pages.

IBR Draft SEIS - RECORD #3865 DETAIL

First Name :	Joan
Last Name :	Roberts
Attachments :	DSEIS-3865_Roberts_Original.pdf (607 kb) Joan_Roberts.pdf (764 kb)

Interstate BRIDGE Replacement Program

Interstate Bridge Replacement Program
500 Broadway, Suite 200
Vancouver WA 98660

DRAFT SEIS PUBLIC COMMENT FORM

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*REQUIRED

Date* 11/8/24

First Name* Joan **Last Name*** Robert

Business or Organization _____

Email _____

Phone Number _____

Address _____

City* [redacted] **State*** [redacted] **Zip Code*** _____

Comment*

See comments on the back

Comment

Yes to new bridge – for safety & traffic ~~effi~~ flow efficiency
No - because this will have a big impact on my commute time to work from Battle Ground to PDX downtown during the construction
~~fee~~
No to toll because my paycheck won't be able to sustain the ~~fee~~ on a daily basis. This might will cause me to quit my job because money wise it won't make sense anymore to ~~keep my favorite job~~ if when my paycheck ~~is ge~~ gets smaller & smaller.

I like the one with double design, ~~not only~~ w/ no draw bridge. Not only saves time for commute + having a dedicated lane for transit will help lessen traffic on the main bridge.

If more space is needed for public comment, please add additional pages.

Interstate Bridge Replacement Program
500 Broadway, Suite 200
Vancouver WA 98660

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*REQUIRED

Date* 11/8/24

First Name* Joan **Last Name*** Roberts

Business or Organization _____

Email _____

Phone Number _____

Address _____

City* Battle Ground **State*** WA **Zip Code*** _____

Comment*

See comments on the back

Comment **Page 2**

Yes to new bridge - for safety + traffic ~~effi~~ flow efficiency
No - because this will have a big impact on my commute time to work from Battle Ground to Pdx downtown during the construction

No to toll fee because my paycheck won't be able to sustain the fee on a daily basis. This might/will cause me to quit my job because money wise it won't make sense anyone to ~~keep my favorite job~~ if when my paycheck ~~is ge~~ gets smaller + smaller.

I like the one with double design, ~~not only~~ w/ no draw bridge. Not only saves time for commuter + having a dedicated lane for transit will help lessen traffic on the main bridge.

If more space is needed for public comment, please add additional pages.

IBR Draft SEIS - RECORD #3866 DETAIL

First Name :	Evelyn
Last Name :	Manalo
Attachments :	DSEIS-3866_Manalo_Original.pdf (870 kb) Evelyn_Manalo.pdf (643 kb)

Interstate BRIDGE Replacement Program

Interstate Bridge Replacement Program
500 Broadway, Suite 200
Vancouver WA 98660

DRAFT SEIS PUBLIC COMMENT FORM

Public Comment must be submitted by 11:59 p.m. PST Monday, Nov. 18, 2024. Comments can be provided in your native language. Language interpretation and ASL services can also be made available upon request.

How to submit public comment:

- Online: https://www.interstatebridge.org/DraftSEIS
- Email: draftseis@interstatebridge.org. Please include "Draft SEIS public comment" in the subject line.
- Phone: 866-IBR-SEIS (427-7347)
- Mail: Interstate Bridge Replacement Program, *Attn*: Draft SEIS Public Comment
  500 Broadway, Suite 200, Vancouver WA 98660
- Public Hearings: Both in-person and virtual public hearing opportunities will be held. Visit our online calendar at https://www.interstatebridge.org/get-involved-folder/calendar/ to learn more.

*REQUIRED

Date* 11/8/2024

First Name* EVELYN **Last Name*** MANALO

Business or Organization _____

Email _____

Phone Number _____

Address _____

City* [redacted] **State*** [redacted] **Zip Code*** [redacted]

Comment*

YES, I'D LIKE A NEW BRIDGE BUILT. THE EXISTING BRIDGE IS OLD, OUT-DATED AND POSSIBLY NEEDS MORE REPAIRS THAN NOT. THE EXISTING BRIDGE LOOKS SMALL, LESS # OF LANES.

I'D LIKE TO SEE A NEW BRIDGE BUILT THAT IS MODERN,

→

Comment

BIGGER, WIDER, WITH MORE LANES. I CHOSE THE DOUBLE LEVEL SPAN THAT HAS LRT IN THE BOTTOM LEVEL AND THERE WILL BE NO NEED TO DRAW OR OPEN UP TO ACCOMMODATE RIVER TRAFFIC, TO SAVE TIME AND POSSIBLY LESS EXPENSE ON MECHANICAL FEATURES. I AM EXCITED TO SEE A BRAND NEW, AM "UPGRADED" KIND OF BRIDGE ☺ TO SERVE BOTH OR + WA STATES.

If more space is needed for public comment, please add additional pages.

Interstate Bridge Replacement Program
500 Broadway, Suite 200
Vancouver WA 98660

DRAFT SEIS PUBLIC COMMENT FORM

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*REQUIRED

Date* 11/8/2024

First Name* EVELYN **Last Name*** MANALO

Business or Organization _____

Email _____

Phone Number _____

Address _____

City* PORTLAND **State*** OR **Zip Code*** 97230

Comment*

YES, I'D LIKE A NEW BRIDGE BUILT. THE EXISTING BRIDGE IS OLD, OUT-DATED AND POSSIBLY NEEDS MORE REPAIRS THAN NOT. THE EXISTING BRIDGE LOOKS SMALL, LESS # OF LANES.

I'D LIKE TO SEE A NEW BRIDGE BUILT THAT IS MODERN,

→

Comment

BIGGER, WIDER, WITH MORE LANES. I CHOSE THE DOUBLE LEVEL SPAN THAT HAS LRT IN THE BOTTOM LEVEL AND THERE WILL BE NO NEED TO DRAW OR OPEN UP TO ACCOMMODATE RIVER TRAFFIC, TO SAVE TIME AND POSSIBLY LESS EXPENSE ON MECHANICAL FEATURES. I AM EXCITED TO SEE A BRAND NEW, AM "UPGRADED" KIND OF BRIDGE ☺ TO SERVE BOTH OR + WA STATES.

If more space is needed for public comment, please add additional pages.

IBR Draft SEIS - RECORD #3867 DETAIL

First Name :	Amalia
Last Name :	Aguinaldo
Attachments :	DSEIS-3867_Aguinaldo_Original.pdf (613 kb)

Interstate BRIDGE Replacement Program

Interstate Bridge Replacement Program
500 Broadway, Suite 200
Vancouver WA 98660

DRAFT SEIS PUBLIC COMMENT FORM

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*REQUIRED

Date* 11-8-24

First Name* Amalia **Last Name*** Aguinaldo

Business or Organization _____

Email [redacted]

Phone Number _____

Address _____

City* [redacted] **State*** [redacted] **Zip Code*** [redacted]

Comment*

Building a new bridge will be helpful for our future. Considering the climate changing, we don't know what catastrophy we will be expecting. There's a big treat for earthquake & this one is the one that concern me more. The present bridge right now

Comment

is too old + needs replacements of course for the safety of the people. I prefer to have the double level span because i believe that this is less expensive + the LRT (at the) below it make it easy to get through traffic faster. It can also save the water traffic underneath. Demolishing the old bridge + building a new one will benefits the future commuter to have a more strong, durable + dependable road to drive with.

If more space is needed for public comment, please add additional pages.

IBR Draft SEIS - RECORD #3868 DETAIL

First Name :	Noelle
Last Name :	Tadeo
Attachments :	DSEIS-3868_Tadeo_Original.pdf (578 kb)

Interstate Bridge Replacement Program
500 Broadway, Suite 200
Vancouver WA 98660

DRAFT SEIS PUBLIC COMMENT FORM

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*REQUIRED

Date* 11/08/2024

First Name* Noelle **Last Name*** Tadeo

Business or Organization _____

Email [redacted]

Phone Number _____

Address _____

City* [redacted] **State*** [redacted] **Zip Code*** [redacted]

Comment*

My preference is the Double-Deck Fixed Span Configuration. As a commuter I would prefer the clear view to the edges of the bridge, not a train blocking the view. As an LRT user or pedestrian, I would not want vehicles and their potential exhaust that close to me, on the same level.

Comment **Page 2**

The double-deck accomplishes this. With the Double-Deck I appreciate that there is no drawbridge, and the separation of vehicle commuters, and rail / bicycle / pedestrian commuters.

If more space is needed for public comment, please add additional pages.

IBR Draft SEIS - RECORD #3869 DETAIL

First Name :	Ivy
Last Name :	Verzosa
Attachments :	DSEIS-3869_Verzosa_Original.pdf (296 kb)

Interstate Bridge Replacement Program
500 Broadway, Suite 200
Vancouver WA 98660

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*REQUIRED

Date* 11-8-24

First Name* Ivy **Last Name*** Verzosa

Business or Organization _____

Email [redacted]

Phone Number _____

Address _____

City* [redacted] **State*** [redacted] **Zip Code*** [redacted]

Comment*

- I would say yes to IBR.
- I like the idea of Double-Deck fixed span config. It's very futuristic and it's very convenient for all of us having a four lane bridge. ~~It's also nice to have~~ For 100 years, I think it's time to change it. because it's too old. :)

IBR Draft SEIS - RECORD #3870 DETAIL

First Name :	Felda
Last Name :	Saunders
Attachments :	DSEIS-3870_Saunders_Original.pdf (650 kb)

Programa sa Pagpapalit ng Tulay sa Intersta
500 Broadway, Suite 200
Vancouver WA 98660

DRAFT SEIS PUBLIC COMMENT FORM

Ang Pampublikong Komento ay dapat isumite bago ang 11:59 pm PST Lunes, Nob. 18, 2024. Maaaring magbigay ng mga komento sa iyong sariling wika. Ang interpretasyon ng wika at mga serbisyo ng ASL ay maaari ding maging available kapag hiniling.

Paano magsumite ng pampublikong komento:

- Online: https://www.interstatebridge.org/DraftSEIS
- Email: draftseis@interstatebridge.org . Pakisama ang "Draft SEIS pampublikong komento" sa linya ng paksa.
- Telepono: 866-IBR-SEIS (427-7347)
- Mail: Interstate Bridge Replacement Program, *Attn* : Draft SEIS Public Comment
  500 Broadway, Suite 200, Vancouver WA 98660
- Mga Pampublikong Pagdinig: Ang parehong mga pagkakataon sa personal at virtual na pampublikong pagdinig ay gaganapin. Bisitahin ang aming online na kalendaryo sa https://www.interstatebridge.org/get-involved-folder/calendar/ para matuto pa.

* KINAKAILANGAN

Petsa * Nov. 8, 2024

Unang Pangalan * Felica **Apelyido** * Saunders

Negosyo o Organisasyon FAAV

Email _____

Numero ng Telepono _____

Address _____

Lungsod * [redacted] **Estado** * [redacted] **Zip Code** * [redacted]

Komento *

Yes - to the bridge with Double (Decker) level
Span with the Light Rail.
This will definitely lessen the traffic
from both ends, on the Washington and

Komento Page 2

Oregon Side.

This will also help with River traffic where they won't have to wait for the bridge to come and down. And then the traffic on the freeway.

Also having more lanes that are wider will also help with lessen traffic.

Kung kailangan ng karagdagang espasyo para sa pampublikong komento, mangyaring magdagdag ng mga karagdagang pahina.

IBR Draft SEIS - RECORD #3871 DETAIL

First Name :	Vivian
Last Name :	Tadeo
Attachments :	DSEIS-3871_Tadeo_Original.pdf (391 kb)

Interstate Bridge Replacement Program
500 Broadway, Suite 200
Vancouver WA 98660

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***REQUIRED**

Date* 11-8-24

First Name* VIVIAN **Last Name*** TADEO

Business or Organization

Email

Phone Number [redacted]

Address

City* [redacted] **State*** [redacted] **Zip Code*** [redacted]

Comment*

PREFER THE DOUBLE LEVEL SPAN
-no confusion, the current is too old
and ~~might~~ n always congested.
I don't like to have to wait when bridge
is drawn. It sounds rickity like it is
ready to fall apart.

IBR Draft SEIS - RECORD #3872 DETAIL

First Name :	Mila
Last Name :	Nelson
Attachments :	136251_DSEIS3872_Nelson_Original.pdf (546 kb)

DRAFT SEIS PUBLIC COMMENT FORM

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Date* 11/5/24 ***REQUIRED**

First Name* Mila **Last Name*** Nelson

Business or Organization N/A

Email [redacted]

Phone Number [redacted]

Address [redacted]

City* [redacted] **State*** [redacted] **Zip Code*** [redacted]

Comment*

I like the SINGLE LEVEL FIXED-SPAN * - I think * provides a faster flow of traffic & may cost less to build.

IBR Draft SEIS - RECORD #3873 DETAIL

First Name :	Marty
Last Name :	Valencia
Attachments :	DSEIS-3873_Valencia_Original.pdf (443 kb)

Interstate Bridge Replacement Program
500 Broadway, Suite 200
Vancouver WA 98660

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Date* 11/6/24 ***REQUIRED**

First Name* Marty **Last Name*** Valencia

Business or Organization N/A

Email no email

Phone Number [redacted]

Address

City* [redacted] **State*** [redacted] **Zip Code*** [redacted]

Comment*

I prefer the single level fixed-span because it provide a more continuous flow. Also, the budget may be more fair.

IBR Draft SEIS - RECORD #3874 DETAIL

First Name :	Zenaida
Last Name :	Hughes
Attachments :	DSEIS-3874_Hughes_Original.pdf (283 kb)

Interstate Bridge Replacement Program
500 Broadway, Suite 200
Vancouver WA 98660

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Date* 11-5-24 ***REQUIRED**

First Name* Zenaida **Last Name*** Hughes

Business or Organization N/A

Email no email

Phone Number [redacted]

Address

City* [redacted] **State*** [redacted] **Zip Code*** [redacted]

Comment*

Double Deck Span Peaks Span
more car can go more and trafic go faster

IBR Draft SEIS - RECORD #3875 DETAIL

First Name :	Grace
Last Name :	Tabiolo
Attachments :	DSEIS-3875_Tabiolo_Original.pdf (300 kb)

Interstate Bridge Replacement Program
500 Broadway, Suite 200
Vancouver WA 98660

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Date* 11-6-24 ***REQUIRED**

First Name* GRACE **Last Name*** TABIOLO

Business or Organization N/A

Email NO EMAIL

Phone Number [redacted]

Address

City* [redacted] **State*** [redacted] **Zip Code*** [redacted]

Comment*

I like - DOUBLE-DECK FIXED - SPAN because TRAFFIC
MOVE FASTER AND provide MULTI PUBLIC TRANSPORTATION

IBR Draft SEIS - RECORD #3876 DETAIL

First Name :	Ginalyn
Last Name :	Brown
Attachments :	DSEIS-3876_Brown_Original.pdf (259 kb)

Interstate BRIDGE Replacement Program

Interstate Bridge Replacement Program
500 Broadway, Suite 200
Vancouver WA 98660

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Date* 11-5-24 ***REQUIRED**

First Name* GINALYN **Last Name*** BROWN

Business or Organization N/A

Email [redacted]

Phone Number [redacted]

Address

City* [redacted] **State*** [redacted] **Zip Code*** [redacted]

Comment*

Double Deck Fixed SPAN

* Traffic moves faster
* Provides more option for vehicles and people

IBR Draft SEIS - RECORD #3877 DETAIL

First Name :	Carlina
Last Name :	Damo
Attachments :	DSEIS-3877_Damo_Original.pdf (279 kb)

Interstate Bridge Replacement Program
500 Broadway, Suite 200
Vancouver WA 98660

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Date* 11-5-24 ***REQUIRED**

First Name* CARLINA DA **Last Name*** DAMO

Business or Organization N/A

Email NO EMAIL

Phone Number [redacted]

Address

City* [redacted] **State*** [redacted] **Zip Code*** [redacted]

Comment*

SINGLE LEVEL FIXED SPAN
CAN BUILD FASTER AND COST LESS
SIMPLE AND STRAIGHT FORWARD

IBR Draft SEIS - RECORD #3878 DETAIL

First Name :	Andres
Last Name :	Damo
Attachments :	DSEIS-3878_Damo_Original.pdf (342 kb)

Interstate Bridge Replacement Program
500 Broadway, Suite 200
Vancouver WA 98660

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***REQUIRED**

Date* 11-5-24

First Name* Andres **Last Name*** Damo

Business or Organization n/a

Email n/a

Phone Number [redacted]

Address [redacted]

City* [redacted] **State*** [redacted] **Zip Code*** [redacted]

Comment*

Doubled Deck Fixed-Span → make traffic go faster.
Multi mode transportation plus pedestrian access.

IBR Draft SEIS - RECORD #3879 DETAIL

First Name :	Juliet
Last Name :	Brooks
Attachments :	DSEIS-3879_Brooks_Original.pdf (368 kb)

Interstate Bridge Replacement Program
500 Broadway, Suite 200
Vancouver WA 98660

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Date* 11-5-24 ***REQUIRED**

First Name* JULIET **Last Name*** BROOKS

Business or Organization n/a

Email [redacted]

Phone Number [redacted]

Address

City* [redacted] **State*** [redacted] **Zip Code*** [redacted]

Comment*

Double Deck Fixed-Span. - Traffic move faster.
Provide multi public transportation.

IBR Draft SEIS - RECORD #3880 DETAIL

First Name :	Vaneza
Last Name :	Damo
Attachments :	DSEIS-3880_Damo_Original.pdf (370 kb)

Interstate Bridge Replacement Program
500 Broadway, Suite 200
Vancouver WA 98660

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***REQUIRED**

Date* _____

First Name* VANEZA ~~DAMOVM~~ error **Last Name*** DAMO

Business or Organization N/A

Email [redacted]

Phone Number [redacted]

Address _____

City* [redacted] **State*** [redacted] **Zip Code*** [redacted]

Comment*

I like the single level movable span. This will be good because ships travel the columbia River and they can go through easily.

IBR Draft SEIS - RECORD #3881 DETAIL

First Name :	Milagros
Last Name :	Damo
Attachments :	DSEIS-3881_Damo_Original.pdf (333 kb)

Interstate Bridge Replacement Program
500 Broadway, Suite 200
Vancouver WA 98660

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***REQUIRED**

Date* 11-5-24

First Name* Milagros **Last Name*** Dano

Business or Organization NA

Email _____

Phone Number _____

Address _____

City* [redacted] **State*** [redacted] **Zip Code*** [redacted]

Comment*

Double Deck Fixed-Span - I like it because multi transportation use.

IBR Draft SEIS - RECORD #3882 DETAIL

First Name :	Anne Margarett
Last Name :	Aguinaldo
Attachments :	DSEIS-3882_Aguinaldo_Original.pdf (265 kb)

Interstate BRIDGE Replacement Program

Interstate Bridge Replacement Program
500 Broadway, Suite 200
Vancouver WA 98660

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Date* 11-5-24 ***REQUIRED**

First Name* Anne Margarett **Last Name*** Aguinaldo

Business or Organization n/a

Email [redacted]

Phone Number [redacted]

Address [redacted]

City* [redacted] **State*** [redacted] **Zip Code*** [redacted]

Comment*

Single level fixed span cost less. This can make it build faster.

IBR Draft SEIS - RECORD #3883 DETAIL

First Name :	My
Last Name :	Le
Attachments :	DSEIS-3883_Le_Original.pdf (461 kb)

Interstate BRIDGE Replacement Program

Chương trình thay thế cầu liên bang
500 Broadway, Phòng 200
Vancouver, WA 98660

BẢN DỰ THẢO BIỂU MẪU Ý KIẾN CÔNG CHÚNG SEIS

Bình luận của công chúng phải được gửi trước 11:59 tối PST Thứ Hai, ngày 18 tháng 11 năm 2024. Bạn có thể cung cấp bình luận bằng ngôn ngữ mẹ đẻ của mình. Dịch vụ phiên dịch ngôn ngữ và ASL cũng có thể được cung cấp theo yêu cầu.

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- Điện thoại: 866-IBR-SEIS (427-7347)
- Thư: Chương trình thay thế cầu liên bang, *Attn* : Bản thảo ý kiến công chúng của SEIS
  500 Broadway, Phòng 200, Vancouver WA 98660
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* YÊU CẦU

Ngày * 10/17/2024

Tên * MY [redacted] **Họ** * LE

Doanh nghiệp hoặc Tổ chức

CELS / CELS

Thư điện tử [redacted]

Số điện thoại [redacted]

Địa chỉ [redacted]

Thành phố * [redacted] **Tiểu bang** * [redacted] **Mã bưu chính** * [redacted]

Bình luận *

This is a very great idea.

IBR Draft SEIS - RECORD #3884 DETAIL

First Name :	Ngoc Oanh
Last Name :	Huynh
Attachments :	DSEIS-3884_Huynh_Original.pdf (490 kb)

Chương trình thay thế cầu liên bang
500 Broadway, Phòng 200
Vancouver, WA 98660

BẢN DỰ THẢO BIỂU MẪU Ý KIẾN CÔNG CHÚNG SEIS

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* YÊU CẦU

Ngày * 10/17/24

Tên * NGỌC OANH **Họ** * HUỲNH

Doanh nghiệp hoặc Tổ chức

_____

Thư điện tử _[redacted]

Số điện thoại [redacted]

Địa chỉ _[redacted]

Thành phố [redacted] **Tiểu bang** * [redacted] **Mã bưu chính** * [redacted]

Bình luận *

I like and support this project. I rather pay tolls, save traveling time before and after work.

IBR Draft SEIS - RECORD #3885 DETAIL

First Name :	Tuong
Last Name :	Kha
Attachments :	DSEIS-3885_Kha_Original.pdf (456 kb)

Chương trình thay thế cầu liên bang
500 Broadway, Phòng 200
Vancouver, WA 98660

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* YÊU CẦU

Ngày * 10/17/2024

Tên * Thương **Họ** * Khu

Doanh nghiệp hoặc Tổ chức

_____

Thư điện tử _____

Số điện thoại [redacted]

Địa chỉ [redacted] _____

Thành phố * [redacted] **Tiểu bang** * [redacted] **Mã bưu chính** * [redacted]

_____

Bình luận *

I agree with this project, but don't like the idea of tolls.

IBR Draft SEIS - RECORD #3886 DETAIL

First Name :	Thai
Last Name :	Nguyen
Attachments :	DSEIS-3886_Nguyen_Original.pdf (506 kb)

Chương trình thay thế cầu liên bang
500 Broadway, Phòng 200
Vancouver, WA 98660

BẢN DỰ THẢO BIỂU MẪU Ý KIẾN CÔNG CHÚNG SEIS

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* YÊU CẦU

Ngày * 12/10/2024

Tên * THAI **Họ** * NGUYEN

Doanh nghiệp hoặc Tổ chức

CEAS

Thư điện tử _[redacted]_

Số điện thoại _[redacted]_

Địa chỉ _[redacted]_

Thành phố * _[redacted]_ **Tiểu bang** * _[redacted]_ **Mã bưu chính** * _[redacted]_

Bình luận *

The traffic will be much better and improved when the bridge is replaced. I hope the traffic will not be an issue anymore during peak time everyday.

IBR Draft SEIS - RECORD #3887 DETAIL

First Name :	Tram
Last Name :	Nguyen
Attachments :	DSEIS_3887_Nguyen_LetterSize_Original.pdf (588 kb)

Chương trình thay thế cầu liên bang
500 Broadway, Phòng 200
Vancouver, WA 98660

BẢN DỰ THẢO BIỂU MẪU Ý KIẾN CÔNG CHÚNG SEIS

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*** YÊU CẦU**

Ngày * 10-17-2024

Tên * TRAM **Họ** * NGUYEN

Doanh nghiệp hoặc Tổ chức

CELS

Thư điện tử [redacted]

Số điện thoại [redacted]

Địa chỉ [redacted]

Thành phố * [redacted] **Tiểu bang** * [redacted] **Mã bưu chính** * [redacted]

Bình luận *

I like and support the idea of the IBR project. I also agree to pay tolls while the bridge is being built and after it finishes.

IBR Draft SEIS - RECORD #3888 DETAIL

First Name :	Tam
Last Name :	Nguyen
Attachments :	DSEIS-3888_Nguyen_Original.pdf (481 kb)

Chương trình thay thế cầu liên bang
500 Broadway, Phòng 200
Vancouver, WA 98660

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* YÊU CẦU

Ngày * 10/17/24

Tên * Tam (Nguyen) **Họ** * Nguyen

Doanh nghiệp hoặc Tổ chức

_____

Thư điện tử [redacted]

Số điện thoại [redacted]

Địa chỉ [redacted]

Thành phố * [redacted] **Tiểu bang** * [redacted] **Mã bưu chính** * [redacted]

Bình luận *

I am excited for a safe environment and secure bridge will be built soon.

IBR Draft SEIS - RECORD #3889 DETAIL

First Name :	Myleen
Last Name :	Fiti
Attachments :	DSEIS-3889_Fiti_Original.pdf (822 kb)

ENTERED

Interstate BRIDGE Replacement Program

Interstate Bridge Replacement Program
500 Broadway, Suite 200
Vancouver WA 98660

DRAFT SEIS PUBLIC COMMENT FORM

Public Comment must be submitted by 11:59 p.m. PST Monday, Nov. 18, 2024. Comments can be provided in your native language. Language interpretation and ASL services can also be made available upon request.

How to submit public comment:

- Online: https://www.interstatebridge.org/DraftSEIS
- Email: draftseis@interstatebridge.org. Please include "Draft SEIS public comment" in the subject line.
- Phone: 866-IBR-SEIS (427-7347)
- Mail: Interstate Bridge Replacement Program, *Attn*: Draft SEIS Public Comment
  500 Broadway, Suite 200, Vancouver WA 98660
- Public Hearings: Both in-person and virtual public hearing opportunities will be held. Visit our online calendar at https://www.interstatebridge.org/get-involved-folder/calendar/ to learn more.

*REQUIRED

Date* 10/17/24

First Name* Mylen **Last Name*** Fiti

Business or Organization IRCO

Email [redacted]

Phone Number [redacted]

Address [redacted]

City* [redacted] **State*** [redacted] **Zip Code*** [redacted]

Comment*

Expanding transit options would be a huge benefit for those who don't drive, making it easier for them to access jobs, services, and ~~leisure~~ leisure activities on both sides of the river. It could also encourage more people to use public transit, reducing traffic

Comment

congestion and emissions. Increased accessibility for everyone is a key step towards a more sustainable and connected region.

If more space is needed for public comment, please add additional pages.

IBR Draft SEIS - RECORD #3890 DETAIL

First Name :	Tri
Last Name :	To
Attachments :	DSEIS-3890_To_Original.pdf (479 kb)

Chương trình thay thế cầu liên bang
500 Broadway, Phòng 200
Vancouver, WA 98660

BẢN DỰ THẢO BIỂU MẪU Ý KIẾN CÔNG CHÚNG SEIS

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* YÊU CẦU

Ngày * 10/17/2024

Tên * Tri **Họ** * To

Doanh nghiệp hoặc Tổ chức

CELS

Thư điện tử [redacted]

Số điện thoại [redacted]

Địa chỉ _____

Thành phố * [redacted] **Tiểu bang** * [redacted] **Mã bưu chính** * [redacted]

Bình luận *

The new bridge would resolve the daily traffic on the interstate bridge to connect 2 states.

IBR Draft SEIS - RECORD #3891 DETAIL

First Name :	Tu
Last Name :	Nguyen
Attachments :	DSEIS-3891_Nguyen_Original.pdf (553 kb)

Interstate BRIDGE Replacement Program

Chương trình thay thế cầu liên bang
500 Broadway, Phòng 200
Vancouver, WA 98660

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* YÊU CẦU

Ngày * 10/17/2024

Tên * TU **Họ** * NGUYEN

Doanh nghiệp hoặc Tổ chức

CELS

Thư điện tử [redacted]

Số điện thoại [redacted]

Địa chỉ [redacted]

Thành phố [redacted] **Tiểu bang** * [redacted] **Mã bưu chính** * [redacted]

Bình luận *

I support the IBR project, and wish it starts asap. I don't care about the tolls.

I am excited to drive on the Interstate bridge with no headache of traffic everyday before and after work.

IBR Draft SEIS - RECORD #3892 DETAIL

First Name :	Tuan
Last Name :	Nguyen
Attachments :	DSEIS-3892_Nguyen_Original.pdf (522 kb)

Chương trình thay thế cầu liên bang
500 Broadway, Phòng 200
Vancouver, WA 98660

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* YÊU CẦU

Ngày * 10/17/2024

Tên * TUAN **Họ** * NGUYEN

Doanh nghiệp hoặc Tổ chức

CELS chau

Thư điện tử [redacted]

Số điện thoại [redacted]

Địa chỉ [redacted]

Thành phố * [redacted] **Tiểu bang** * [redacted] **Mã bưu chính** * [redacted]

Bình luận *

The IBR project would meet the commuters' needs. I can envision people won't be frustrated and anxious/worried while driving on the interstate bridge anymore.

IBR Draft SEIS - RECORD #3893 DETAIL

First Name :	Minh Tri
Last Name :	Huynh
Attachments :	DSEIS-3893_Huynh_Original.pdf (517 kb)

Chương trình thay thế cầu liên bang
500 Broadway, Phòng 200
Vancouver, WA 98660

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- Thư: Chương trình thay thế cầu liên bang, *Attn* : Bản thảo ý kiến công chúng của SEIS
  500 Broadway, Phòng 200, Vancouver WA 98660
- Phiên điều trần công khai: Sẽ tổ chức cả phiên điều trần công khai trực tiếp và trực tuyến. Truy cập lịch trực tuyến của chúng tôi tại https://www.interstatebridge.org/get-involved-folder/calendar/ để tìm hiểu thêm.

* YÊU CẦU

Ngày * 10/17/2024

Tên * MINH TRI **Họ** * HUỲNH

Doanh nghiệp hoặc Tổ chức

CELS

Thư điện tử _____

Số điện thoại [redacted]

Địa chỉ [redacted]

Thành phố * [redacted] **Tiểu bang** * [redacted] **Mã bưu chính** * [redacted]

Bình luận *

That is a great idea to replace the Interstate Bridge.

I would like to support the idea of paying tolls after the project is complete.

IBR Draft SEIS - RECORD #3894 DETAIL

First Name :	Minh Tam
Last Name :	Huynh
Attachments :	DSEIS-3894_Huynh_Original.pdf (517 kb)

Chương trình thay thế cầu liên bang
500 Broadway, Phòng 200
Vancouver, WA 98660

BẢN DỰ THẢO BIỂU MẪU Ý KIẾN CÔNG CHÚNG SEIS

Bình luận của công chúng phải được gửi trước 11:59 tối PST Thứ Hai, ngày 18 tháng 11 năm 2024. Bạn có thể cung cấp bình luận bằng ngôn ngữ mẹ đẻ của mình. Dịch vụ phiên dịch ngôn ngữ và ASL cũng có thể được cung cấp theo yêu cầu.

Cách gửi bình luận công khai:

- Trực tuyến: https://www.interstatebridge.org/DraftSEIS
- Email: draftseis@interstatebridge.org . Vui lòng ghi "Dự thảo ý kiến công chúng về SEIS" vào dòng tiêu đề.
- Điện thoại: 866-IBR-SEIS (427-7347)
- Thư: Chương trình thay thế cầu liên bang, *Attn* : Bản thảo ý kiến công chúng của SEIS
  500 Broadway, Phòng 200, Vancouver WA 98660
- Phiên điều trần công khai: Sẽ tổ chức cả phiên điều trần công khai trực tiếp và trực tuyến. Truy cập lịch trực tuyến của chúng tôi tại https://www.interstatebridge.org/get-involved-folder/calendar/ để tìm hiểu thêm.

* YÊU CẦU

Ngày * 10/17/24

Tên * MINH THAM **Họ** * HUYNH

Doanh nghiệp hoặc Tổ chức

CELS

Thư điện tử [redacted]

Số điện thoại [redacted]

Địa chỉ [redacted]

Thành phố * [redacted] **Tiểu bang** * [redacted] **Mã bưu chính** * [redacted]

Bình luận *

I totally support the IBR project.

However, I wish there are no tolls collected during the replacement bridge and future.

IBR Draft SEIS - RECORD #3895 DETAIL

First Name :	Lan Thu
Last Name :	Pham
Attachments :	DSEIS-3895_Pham_Original.pdf (495 kb)

Chương trình thay thế cầu liên bang
500 Broadway, Phòng 200
Vancouver, WA 98660

BẢN DỰ THẢO BIỂU MẪU Ý KIẾN CÔNG CHÚNG SEIS

Bình luận của công chúng phải được gửi trước 11:59 tối PST Thứ Hai, ngày 18 tháng 11 năm 2024. Bạn có thể cung cấp bình luận bằng ngôn ngữ mẹ đẻ của mình. Dịch vụ phiên dịch ngôn ngữ và ASL cũng có thể được cung cấp theo yêu cầu.

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* YÊU CẦU

Ngày * 10/17/24

Tên * Lan Thu **Họ** * Pham

Doanh nghiệp hoặc Tổ chức

CELS

Thư điện tử [redacted]

Số điện thoại [redacted]

Địa chỉ [redacted]

Thành phố * [redacted] **Tiểu bang** * [redacted] **Mã bưu chính** * [redacted]

Bình luận *

I support the IBR project and would love to drive on the new bridge everyday.

IBR Draft SEIS - RECORD #3896 DETAIL

First Name :	Zinah
Last Name :	Mudhafar
Attachments :	DSEIS-3896_Mudhafar_Original.pdf (314 kb)

Interstate Bridge Replacement Program
500 Broadway, Suite 200
Vancouver WA 98660

DRAFT SEIS PUBLIC COMMENT FORM

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How to submit public comment:

- Online: https://www.interstatebridge.org/DraftSEIS
- Email: draftseis@interstatebridge.org. Please include "Draft SEIS public comment" in the subject line.
- Phone: 866-IBR-SEIS (427-7347)
- Mail: Interstate Bridge Replacement Program, *Attn*: Draft SEIS Public Comment
  500 Broadway, Suite 200, Vancouver WA 98660
- Public Hearings: Both in-person and virtual public hearing opportunities will be held. Visit our online calendar at https://www.interstatebridge.org/get-involved-folder/calendar/ to learn more.

*REQUIRED

Date* 11/18/2024

First Name* Zinah **Last Name*** Mudhafar

Business or Organization Iraqi Society of Oregon

Email [redacted]

Phone Number [redacted]

Address [redacted]

City* [redacted] **State*** [redacted] **Zip Code*** [redacted]

Comment* I have chosen design number three as it appears the most modern, with well-designed lanes and appropriate shoulder widths. However, I do have a concern regarding tolling. Given the already high taxes we pay introducing tolls could place an additional financial burden on commuters, which should be carefully reconsidered. Once the old bridge is demolished and construction begins on the new one. will there be a temporary bridge or alternative arrangements to minimize disruptions for daily commuters? Addressing these considerations will be essential to ensuring public support and project success.

IBR Draft SEIS - RECORD #3897 DETAIL

First Name :	Mohammad
Last Name :	Khalid
Attachments :	DSEIS-3897_Khalid_Original.pdf (347 kb)

Interstate Bridge Replacement Program
500 Broadway, Suite 200
Vancouver WA 98660

DRAFT SEIS PUBLIC COMMENT FORM

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*REQUIRED

Date* 11/16/2024

First Name* Mohammad **Last Name*** Khalid

Business or Organization

Email

Phone Number

Address

City* [redacted] **State*** [redacted] **Zip Code*** [redacted]

Comment*

I think the project is important however, it will create a lot of traffic for the next 15 years It's important to figure out a way to make traffic run smoothly. I am also against the tolls As it's important to keep the roads free of charge to make it accessible to everyone in the community. I think tolling will effect low-income commuters who rely on the bridge daily for work. There is also the issue of displacement of local businesses and residents during construction.

IBR Draft SEIS - RECORD #3899 DETAIL

First Name :	Mayyadah
Last Name :	Al Shaheen
Attachments :	DSEIS-3899_Al Shaheen_Original.pdf (335 kb)

Interstate Bridge Replacement Program
500 Broadway, Suite 200
Vancouver WA 98660

DRAFT SEIS PUBLIC COMMENT FORM

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*REQUIRED

Date* 11/16/2024

First Name* Mayyadah **Last Name*** Al Shaheen

Business or Organization

Email [redacted]

Phone Number [redacted]

Address

City* [redacted] **State*** [redacted] **Zip Code*** [redacted]

Comment*

The funding plan is comprehensive, combining federal, state, and toll revenues, but transparency and careful cost management are vital to address affordability concerns and maintain public trust.

In my opinion, the Double-Deck Fixed-Span option is the best choice, likely offering efficiency, durability, and capacity for the long term.

IBR Draft SEIS - RECORD #3900 DETAIL

First Name :	Aley
Last Name :	Ghabra
Attachments :	DSEIS-3900_Ghabra_Original.pdf (320 kb)

Interstate Bridge Replacement Program
500 Broadway, Suite 200
Vancouver WA 98660

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11/17/2024

*REQUIRED

Date* _____

First Name* Aley **Last Name*** Ghabra

Business or Organization _____

Email [redacted]

Phone Number [redacted]

Address _____

City* [redacted] **State*** [redacted] **Zip Code*** [redacted]

Comment*

Suggestion to Improve the Bridge:
Incorporate sustainable and resilient design elements, such as seismic upgrades and eco-friendly construction materials, while ensuring efficient multimodal transportation options like dedicated lanes for public transit, bikes, and pedestrians.

IBR Draft SEIS - RECORD #3901 DETAIL

First Name :	Yuliia
Last Name :	Fuha
Attachments :	DSEIS-3901_Fuha_Original.pdf (1 mb)

Interstate BRIDGE Replacement Program

Interstate Bridge Replacement Program
500 Broadway, Suite 200
Vancouver WA 98660

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*REQUIRED

Date* 11/13/24

First Name* Yulia **Last Name*** Fuha

Business or Organization Modus Vivendi

Email [redacted]

Phone Number [redacted]

Address [redacted]

City* [redacted] **State*** [redacted] **Zip Code*** [redacted]

Comment*

I living in Vancouver but using this bridge daily, because I Worcing in Downtown and I love this bridge and view from it but design what I saw - awesom I love ride my bike and using this

Comment

ways. I'm glade this bridge will be not only beautiful, but also will more safe when can be happened some earth shake. That will be great when there we can use a lot of lines for public transportatio walkside, but I hope there will ~~be~~ not so high tools, because we pay so high taxes I hope that will be allalwable for everyone and I think there will be solfe some problems with traffics. I like that will be good for ecology, environent and people.

If more space is needed for public comment, please add additional pages.

IBR Draft SEIS - RECORD #3902 DETAIL

First Name :	Svetlana
Last Name :	Litvinenko
Attachments :	DSEIS-3902_Litvinenko_Original.pdf (598 kb)

Interstate Bridge Replacement Program
500 Broadway, Suite 200
Vancouver WA 98660

DRAFT SEIS PUBLIC COMMENT FORM

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- Phone: 866-IBR-SEIS (427-7347)
- Mail: Interstate Bridge Replacement Program, *Attn*: Draft SEIS Public Comment
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*REQUIRED

Date* 11/13/2024

First Name* Svetlana **Last Name*** Litvinenko

Business or Organization Self Employeed

Email [redacted]

Phone Number [redacted]

Address [redacted]

City* [redacted] **State*** [redacted] **Zip Code*** [redacted]

Comment*

I am Svetlana Litvinenko, exciting about replacement of New Interstate Bridge. My comments are it sh must be stable and safe for communities, cars and buisnisses, since many people will use

it every day. The infrastructure of our state matters for economic growth. My concern for this that every step of this work is carefully monitored for the exellent quality of this amazing bridge At the meeting, we talked about the importance of the quality of the bridge, about the beautiful design, and how the bridge would look from the north side, and from the highway. We have choosen Y-shaped cabel state. Also we wondered who would pay for it. And we learneed a lot more interesting things at this meeting

Thank you for coorporations!

IBR Draft SEIS - RECORD #3903 DETAIL

First Name :	Yana
Last Name :	Ponomarova
Attachments :	DSEIS-3903_Ponomarova_Original.pdf (792 kb)

Interstate BRIDGE Replacement Program

Interstate Bridge Replacement Program
500 Broadway, Suite 200
Vancouver WA 98660

DRAFT SEIS PUBLIC COMMENT FORM

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  500 Broadway, Suite 200, Vancouver WA 98660
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*REQUIRED

Date* 11/13/24

First Name* Yana **Last Name*** Ponomarova

Business or Organization self employed

Email [redacted]

Phone Number [redacted]

Address [redacted]

City* [redacted] **State*** [redacted] **Zip Code*** [redacted]

Comment*

This is great project. As we remember from the previous session people prefer 3 Y-shaped cable-stayed bridges. If we were to choose now, it could be a single-level drawbridge. Since a two-level bridge is not suitable for everyone, this is my

opinion. Often people suffer from them. I am not afraid of confined spaces, but I would not want to be in such a passage. As for the choise of most people, it is a cable-stayed bridge. Since it looks advantageous, it is modern. Then this is the best bridge in my opinion. This is beneficial for safety, since it does not create the appearance of sun bunnies when moving. Which cannot be said about heavy concrete structures. Our Portland is a modern city that attracts tourists. And we all want our city to stand out. This is good not only for tourists, but also for the residents themselves. Since our younger generation needs to see modern architecture. Safety and quality are very important to our community. And I think that the timing of the construction of the bridge is correct, because we all understand that any construction means traffic on the rodds in the future.

IBR Draft SEIS - RECORD #3904 DETAIL

First Name :	Lilya
Last Name :	Yevseyeva
Attachments :	DSEIS-3904_Yerseyeva_Original.pdf (798 kb)

Interstate BRIDGE Replacement Program

Interstate Bridge Replacement Program
500 Broadway, Suite 200
Vancouver WA 98660

DRAFT SEIS PUBLIC COMMENT FORM

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*REQUIRED

Date* 11/13/2024

First Name* Lilya **Last Name*** Yerseyeva

Business or Organization PGE

Email [redacted]

Phone Number [redacted]

Address [redacted]

City* [redacted] **State*** [redacted] **Zip Code*** [redacted]

Comment*

This is my second time participating in Interstate Bridge Replacement program engagement activity. I am so exited about this opportunity. You invited people from different communities to participate in this discussion. As we discuss in our previous

Comment

gathering. I am so exiting that this bridge is going to have lines for bikes, walk, vehicles public transportation. Only I am not happy about tolls. I hope it is going to be for a short period of time just to pay for the bridge cost then it will be free to cross. Also for people why cross this bridge every day have to be discount.
This bridge is very important not just to oregonian and people who lives in Washington State, but for all from Mexico to Canada.

If more space is needed for public comment, please add additional pages.

IBR Draft SEIS - RECORD #3905 DETAIL

First Name :	Anatolio
Last Name :	Gvozdicov
Attachments :	DSEIS-3905_Gvozdizov_Original.pdf (600 kb)

Interstate BRIDGE Replacement Program

Interstate Bridge Replacement Program
500 Broadway, Suite 200
Vancouver WA 98660

DRAFT SEIS PUBLIC COMMENT FORM

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*REQUIRED

Date* 11/15/24

First Name* Anatolie **Last Name*** Gvozdicov

Business or Organization

Email

Phone Number

Address

City* [redacted] **State*** [redacted] **Zip Code*** [redacted]

Comment*

From what I read in draft SEIS In my opinion anything old that is being replaced is great. Having tolls will make drivers find a different route. From the designs I like how the finback design looks, looks creative and modern

Comment

Any improvements or additions that will make less traffic will be great for the roads. Drivers would want to use bridge where there is less traffic. Wanted also to know what the speed limit will be on the bridge?

If more space is needed for public comment, please add additional pages.

IBR Draft SEIS - RECORD #3906 DETAIL

First Name :	Victoria
Last Name :	Prodan
Attachments :	DSEIS-3906_Prodan_Original.pdf (636 kb)

Interstate BRIDGE Replacement Program

Interstate Bridge Replacement Program
500 Broadway, Suite 200
Vancouver WA 98660

DRAFT SEIS PUBLIC COMMENT FORM

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*REQUIRED

Date* [redacted] 11-15-24

First Name* Victoria **Last Name*** Prodan

Business or Organization

Email [redacted]

Phone Number [redacted]

Address [redacted]

City* [redacted] **State*** [redacted] **Zip Code*** [redacted]

Comment*

Adding a toll to a bridge could unfairly impact people who don't have a lot of money. Many rely on the bridge to get to work, school, or important places, and paying extra everytime they cross could make it harder for them to

afford these daily trips. It might even limit their ability to access essential services, like doctors or grocery stores, creating more stress and financial strain. The finback design of the new Interstate Bridge would be a visually striking and modern addition to the city, creating a unique land mark that reflects the areas innovation and growth.

IBR Draft SEIS - RECORD #3907 DETAIL

First Name :	Olesya
Last Name :	Prodan
Attachments :	DSEIS-3907_Prodan_Original.pdf (647 kb)

Interstate BRIDGE Replacement Program

Interstate Bridge Replacement Program
500 Broadway, Suite 200
Vancouver WA 98660

DRAFT SEIS PUBLIC COMMENT FORM

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*REQUIRED

Date* 11-15-24

First Name* Olesya **Last Name*** Predan

Business or Organization

Email [redacted]

Phone Number [redacted]

Address [redacted]

City* [redacted] **State*** [redacted] **Zip Code*** [redacted]

Comment*

Adding a toll to the bridge could hurt nearby businesses because fewer people might want to cross and shop there. If people try to avoid the toll by taking other routes, businesses near the bridge could lose

customers, leading less money coming in. This could make it harder for these businesses to stay open or support the local economy. The extra lanes would help ease traffic congestion, allowing for smoother commutes and better transportation flow, which would benefit both residents and businesses by saving time and improving accessibility.

IBR Draft SEIS - RECORD #3908 DETAIL

First Name :	Lana
Last Name :	Cucereavii
Attachments :	DSEIS-3908_Cucereavii_Original.pdf (509 kb)

Interstate Bridge Replacement Program
500 Broadway, Suite 200
Vancouver WA 98660

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*REQUIRED

Date* 11/15/24

First Name* Lana **Last Name*** Lucchesi

Business or Organization

Email [redacted]

Phone Number [redacted]

Address [redacted]

City* [redacted] **State*** [redacted] **Zip Code*** [redacted]

Comment*

Adding a toll to the bridge could cause traffic to back up a drivers stop to pay or wait in longer lines. This would mean more cars sitting idle for longer periods, releasing more pollution into the air. The increased emissions will

Comment

harm air quality in surrounding areas, making it unhealthy for people who live and work nearby and contributing to the environmental problems. On the up side the movable single level span is a great design with a tooth of modern Engineering. This innovative approch would be fantastic addition to the city.

If more space is needed for public comment, please add additional pages.

IBR Draft SEIS - RECORD #3909 DETAIL

First Name :	Evelina
Last Name :	Avdeev
Attachments :	DSEIS-3909_Avdeev_Original.pdf (527 kb)

Interstate BRIDGE Replacement Program

Interstate Bridge Replacement Program
500 Broadway, Suite 200
Vancouver WA 98660

DRAFT SEIS PUBLIC COMMENT FORM

Public Comment must be submitted by 11:59 p.m. PST Monday, Nov. 18, 2024. Comments can be provided in your native language. Language interpretation and ASL services can also be made available upon request.

How to submit public comment:

- Online: https://www.interstatebridge.org/DraftSEIS
- Email: draftseis@interstatebridge.org. Please include "Draft SEIS public comment" in the subject line.
- Phone: 866-IBR-SEIS (427-7347)
- Mail: Interstate Bridge Replacement Program, *Attn:* Draft SEIS Public Comment
  500 Broadway, Suite 200, Vancouver WA 98660
- Public Hearings: Both in-person and virtual public hearing opportunities will be held. Visit our online calendar at https://www.interstatebridge.org/get-involved-folder/calendar/ to learn more.

*REQUIRED

Date* 11/15

First Name* Evelina **Last Name*** Avdeev

Business or Organization

Email [redacted]

Phone Number [redacted]

Address [redacted]

City* [redacted] **State*** [redacted] **Zip Code*** [redacted]

Comment*

A toll on the Interstate Bridge would make daily life harder by slowing down traffic and causing delays for people who use it regularly. It would also cost commuters extra money every day, which could be a BIG burden for those who rely on the Bridge to

Comment

Get to work, school, or other important places. This added expense and inconvenience would made daily routines more stressful and difficult. The double deck fixed design is an impressive solution to maximize space. This design is great to allow for better organization of vehicles and reducing traffic flow.

If more space is needed for public comment, please add additional pages.

IBR Draft SEIS - RECORD #3910 DETAIL

First Name :	Van-Anh
Last Name :	Le
Attachments :	DSEIS-3910_Le_Original.pdf (607 kb)

Interstate Bridge Replacement Program
500 Broadway, Suite 200
Vancouver WA 98660

DRAFT SEIS PUBLIC COMMENT FORM

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*REQUIRED

Date* 10/23/24

First Name* Van-Anh **Last Name*** Le

Business or Organization _____

Email [redacted]

Phone Number [redacted]

Address _____

City* [redacted] **State*** [redacted] **Zip Code*** [redacted]

Comment*

I prefer the double-level fixed-span, which has more level and space for more cars to travel between WA and OR. It can help to reduce overall traffic congestion, especially during morning and afternoon. I ako like the morderm design

Comment

with future expanding needs as demands increase Please consider to improve to toll-fee system and lower cost for low-income families travelling frequently for work.

If more space is needed for public comment, please add additional pages.

IBR Draft SEIS - RECORD #3911 DETAIL

First Name :	Diem
Last Name :	Nguyen
Attachments :	DSEIS-3911_Nguyen_Original.pdf (892 kb)

Interstate BRIDGE Replacement Program

Interstate Bridge Replacement Program
500 Broadway, Suite 200
Vancouver WA 98660

DRAFT SEIS PUBLIC COMMENT FORM

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*REQUIRED

Date* 10/23/2024

First Name* Diem **Last Name*** Nguyen

Business or Organization _____

Email [redacted]

Phone Number _____

Address _____

City* [redacted] **State*** [redacted] **Zip Code*** [redacted]

Comment*

- I prefer working on double-deck fixed span structures due to their numerous advantages. These designs incorporate emergency lanes and dedicated lanes for public transportation, which significantly enhance both safety and operational efficiency. Additionally, by optimizing traffic flow and

reducing congestion, they contribute to more sustainable urban infrastructure solutions. The integration of multiple transpat modes within a single structure offers convenience for both everyday commuters and emergency services, making these structures a more robust and future proof choice

I suggest that bridge tolls should base on individual 's income levels to promote equity, particularly for low-income people. This approach would ensure that tolls are more fairly distributed, reducing the financial burden on those with lower incomes while still maintaining the necessary funding for infrastructure maintenance and improvements. By implementing a system that accounts for personal earings, it could help create a more inclusive and socially responsible toll policy.

You should consider minimizing lane closures during peak working hours to reduce traffic congestion and accidents. By scheduling construction and maintenance activities during off-peak time, such as late at night or early morning.

And I think you should sending maintenance planning by mail to residents. Therefore, we can enhance safety and reduce the risk of accidents in the construction zones.

IBR Draft SEIS - RECORD #3912 DETAIL

First Name :	Tram
Last Name :	Nguyen
Attachments :	DSEIS-3912_Nguyen_Original.pdf (329 kb)

Interstate BRIDGE Replacement Program

Interstate Bridge Replacement Program
500 Broadway, Suite 200
Vancouver WA 98660

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***REQUIRED**

Date* 10/24/24

First Name* Tram **Last Name*** Nguyen

Business or Organization IRCO

Email [redacted]

Phone Number [redacted]

Address [redacted]

City* [redacted] **State*** [redacted] **Zip Code*** [redacted]

Comment*

Building a bridge connecting Washington and Portland could have a lot of benefits! It might improve transportation boost local economies, and strengthen community ties. However, it's also important to consider potential environmental impacts and costs.

IBR Draft SEIS - RECORD #3913 DETAIL

First Name :	Orchid
Last Name :	Vo
Attachments :	DSEIS-3913_Vo_Original.pdf (319 kb)

Interstate Bridge Replacement Program
500 Broadway, Suite 200
Vancouver WA 98660

DRAFT SEIS PUBLIC COMMENT FORM

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- Phone: 866-IBR-SEIS (427-7347)
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***REQUIRED**

Date* 10/24/24

First Name* ORCHID **Last Name*** VO

Business or Organization None

Email [redacted]

Phone Number [redacted]

Address [redacted]

City* [redacted] **State*** [redacted] **Zip Code*** [redacted]

Comment*

Reduced travel time: a new bridge can shorten the distance and travel time between two areas.
Increased Accessibility: It can enhance access to services, jobs and recreational areas
Economic growth, Community Connectivity and Cultural exchange.

IBR Draft SEIS - RECORD #3914 DETAIL

First Name :	Christopher
Last Name :	Nguyen
Attachments :	DSEIS-3914_Nguyen_Original.pdf (399 kb)

Interstate Bridge Replacement Program
500 Broadway, Suite 200
Vancouver WA 98660

DRAFT SEIS PUBLIC COMMENT FORM

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*REQUIRED

Date* 10/24/24

First Name* Christopher **Last Name*** Nguyen

Business or Organization None

Email [redacted]

Phone Number [redacted]

Address [redacted]

City* [redacted] **State*** [redacted] **Zip Code*** [redacted]

Comment*

Building a bridge is a significant undertaking that can transform connectivity between states. It's vital to consider both the benefits and challenges, ensuring a holistic approach involves the community, stakeholders and experts

IBR Draft SEIS - RECORD #3915 DETAIL

First Name :	Maven
Last Name :	Nguyen
Attachments :	DSEIS-3915_Nguyen_Original.pdf (484 kb)

Interstate BRIDGE Replacement Program

Interstate Bridge Replacement Program
500 Broadway, Suite 200
Vancouver WA 98660

DRAFT SEIS PUBLIC COMMENT FORM

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*REQUIRED

Date* 10/24/[redacted]24

First Name* Maven **Last Name*** Nguyen

Business or Organization _____

Email [redacted]

Phone Number _____

Address _____

City* [redacted] **State*** [redacted] **Zip Code*** [redacted]

Comment*

I'm support with this project. This help both State be more earthquake safe. I do have concern about how it will effect traffict for the people who use them for their daily commute

IBR Draft SEIS - RECORD #3916 DETAIL

First Name :	Myle
Last Name :	Cao
Attachments :	DSEIS-3916_Cao_Original.pdf (851 kb)

Interstate Bridge Replacement Program
500 Broadway, Suite 200
Vancouver WA 98660

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*REQUIRED

Date* 10/25/2024

First Name* Myle **Last Name*** Cao

Business or Organization _____

Email [redacted]

Phone Number _____

Address _____

City* [redacted] **State*** [redacted] **Zip Code*** [redacted]

Comment*

We should work on double deck fixed span structure because we will have many lanes include emergency lanes also public transportation lanes to reduce traffic flows.

Comment

While you are working on this project, I think you should avoid closing the bridge during working hours and should inform the dates and times that you planned for this maintenance by sending mails to residents to help minimize traffic and accidents.

About the bridge tolls, it should depend based on individual's income for the equity.

If more space is needed for public comment, please add additional pages.

IBR Draft SEIS - RECORD #3917 DETAIL

First Name :	Kim Phuong
Last Name :	Newman
Attachments :	DSEIS-3917_Newman_Original.pdf (426 kb)

Interstate BRIDGE Replacement Program

Interstate Bridge Replacement Program
500 Broadway, Suite 200
Vancouver WA 98660

DRAFT SEIS PUBLIC COMMENT FORM

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  500 Broadway, Suite 200, Vancouver WA 98660
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*REQUIRED

Date* 10-30-24

First Name* KIM PHUONG **Last Name*** NEWMAN

Business or Organization HOUSEWIFE, VOLUNTEER TEACHING ASST

Email _____

Phone Number [redacted]

Address [redacted]

City* [redacted] **State*** [redacted] **Zip Code*** [redacted]

Comment*

IT SEEMS TO ME THAT TO BUILD A NEW BRIDGE MAY BE A GOOD IDEA. PROVIDING A WAY TO BUILD THE BRIDGE WITHOUT MAKING THE 3 COMUNITIES ADD TO TAXES ALREADY BEING PAID.

IBR Draft SEIS - RECORD #3918 DETAIL

First Name :	Robert
Last Name :	Newman
Attachments :	DSEIS-39178_Newman_Original.pdf (418 kb)

Interstate Bridge Replacement Program
500 Broadway, Suite 200
Vancouver WA 98660

DRAFT SEIS PUBLIC COMMENT FORM

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- Phone: 866-IBR-SEIS (427-7347)
- Mail: Interstate Bridge Replacement Program, *Attn*: Draft SEIS Public Comment
  500 Broadway, Suite 200, Vancouver WA 98660
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***REQUIRED**

Date* 10-30-2024

First Name* ROBERT **Last Name*** NEWMAN

Business or Organization RETIRED HYDRO ELECTRIC POWER OPERATOR

Email [redacted]

Phone Number [redacted]

Address [redacted]

City* [redacted] **State*** [redacted] **Zip Code*** [redacted]

Comment*

I THINK A NEW BRIDGE IS NEEDED. HOWEVER TO BUILD A NEW TOLL BRIDGE WILL CREATE A NEW TRAFFIC JAM PROBLEM, AS WELL AS THE TRAFFIC PROBLEM THAT WILL BE CREATED WHILE THE NEW BRIDGE IS BEING BUILT.

IBR Draft SEIS - RECORD #3919 DETAIL

First Name :	An
Last Name :	Huynh
Attachments :	DSEIS-3919_Huynh_Original.pdf (495 kb)

Chương trình thay thế cầu liên bang
500 Broadway, Phòng 200
Vancouver, WA 98560

BẢN DỰ THẢO BIỂU MẪU Ý KIẾN CÔNG CHÚNG SEIS

Bình luận của công chúng phải được gửi trước 11:59 tối PST Thứ Hai, ngày 18 tháng 11 năm 2024. Bạn có thể cung cấp bình luận bằng ngôn ngữ mẹ đẻ của mình. Dịch vụ phiên dịch ngôn ngữ và ASL cũng có thể được cung cấp theo yêu cầu.

Cách gửi bình luận công khai:

- Trực tuyến: https://www.interstatebridge.org/DraftSEIS
- Email: draftseis@interstatebridge.org . Vui lòng ghi "Dự thảo ý kiến công chúng về SEIS" vào dòng tiêu đề.
- Điện thoại: 866-IBR-SEIS (427-7347)
- Thư: Chương trình thay thế cầu liên bang, *Attn* : Bản thảo ý kiến công chúng của SEIS
  500 Broadway, Phòng 200, Vancouver WA 98660
- Phiên điều trần công khai: Sẽ tổ chức cả phiên điều trần công khai trực tiếp và trực tuyến. Truy cập lịch trực tuyến của chúng tôi tại https://www.interstatebridge.org/get-involved-folder/calendar/ để tìm hiểu thêm.

* YÊU CẦU

Ngày * 10/20/2024

Tên * [redacted] **Họ** * HUYNH

Doanh nghiệp hoặc Tổ chức

SEIS

Thư điện tử [redacted]

Số điện thoại [redacted]

Địa chỉ [redacted]

Thành phố * [redacted] **Tiểu bang** * [redacted] **Mã bưu chính** * [redacted]

Bình luận *

~~I THINK THIS IS A GOOD PLAN TO INCREASING~~
TÔI NGHĨ RẰNG VIỆC XÂY CẦU NÀY RẤT TỐT! HY VỌNG VỚI DỰ ÁN NÀY, CHÚNG TA CÓ THỂ GIẢM TÌNH TRẠNG ÙN TẮC GIAO THÔNG, HẠN CHẾ CÁC TAI NẠN LIÊN QUAN VỀ CƠ SỞ HẠ TẦNG.

"I think this project is very great. I hope with the new bridge, we may decrease traffic, and eliminate accidents related to infastructure."

Gửi bình luận *Yêu cầu*

Tên * ÂN Họ * HUỲNH

Doanh nghiệp hoặc Tổ chức SEIS

Email (nhập N/A nếu không có) * [redacted]

Số điện thoại [redacted]

Địa chỉ [redacted]

Thành phố * [redacted]

Tình trạng * [redacted]

Mã bưu chính * [redacted]

Bình luận *

HY VỌNG VỚI DỰ ÁN NÀY, CHÚNG TA SẼ:
- GIẢM ÙN TẮC GIAO THÔNG
- GIẢM TAI NẠN TỪ CƠ SỞ HẠ TẦNG
- TĂNG BĂNG THÔNG KHI LÁI XE.

Hope this project will help:
- Reduction of traffic
- Accidents because of the infrastructure
- Increase the smooth of traffic

IBR Draft SEIS - RECORD #3920 DETAIL

First Name :	An
Last Name :	Huynh
Attachments :	DSEIS-3920_Huynh_Original.pdf (167 kb)

Gửi bình luận *Yêu cầu*

Tên * ÂN Họ * HUỲNH

Doanh nghiệp hoặc Tổ chức SEIS

Email (nhập N/A nếu không có) * [redacted]

Số điện thoại [redacted]

Địa chỉ [redacted]

Thành phố * [redacted]

Tình trạng * [redacted]

Mã bưu chính * [redacted]

Bình luận *

HY VỌNG VỚI DỰ ÁN NÀY, CHÚNG TA SẼ:

- GIẢM ÙN TẮC GIAO THÔNG
- GIẢM TAI NẠN TỪ CƠ SỞ HẠ TẦNG
- TĂNG BĂNG THÔNG KHI LÁI XE.

Hope this project will help:

- Reduction of traffic
- Accidents because of the infrastructure
- Increase the smooth of traffic

IBR Draft SEIS - RECORD #3921 DETAIL

First Name :	Thy
Last Name :	Le
Attachments :	DSEIS-3921_Le_Original.pdf (464 kb)

Chương trình thay thế cầu liên bang
500 Broadway, Phòng 200
Vancouver, WA 98660

BẢN DỰ THẢO BIỂU MẪU Ý KIẾN CÔNG CHÚNG SEIS

Bình luận của công chúng phải được gửi trước 11:59 tối PST Thứ Hai, ngày 18 tháng 11 năm 2024. Bạn có thể cung cấp bình luận bằng ngôn ngữ mẹ đẻ của mình. Dịch vụ phiên dịch ngôn ngữ và ASL cũng có thể được cung cấp theo yêu cầu.

Cách gửi bình luận công khai:

- Trực tuyến: https://www.interstatebridge.org/DraftSEIS
- Email: draftseis@interstatebridge.org . Vui lòng ghi "Dự thảo ý kiến công chúng về SEIS" vào dòng tiêu đề.
- Điện thoại: 866-IBR-SEIS (427-7347)
- Thư: Chương trình thay thế cầu liên bang, *Attn* : Bản thảo ý kiến công chúng của SEIS
  500 Broadway, Phòng 200, Vancouver WA 98660
- Phiên điều trần công khai: Sẽ tổ chức cả phiên điều trần công khai trực tiếp và trực tuyến. Truy cập lịch trực tuyến của chúng tôi tại https://www.interstatebridge.org/get-involved-folder/calendar/ để tìm hiểu thêm.

*** YÊU CẦU**

Ngày * 10/20/24

Tên * Thy Ha **Họ** * Le

Doanh nghiệp hoặc Tổ chức

Self CELS

Thư điện tử [redacted]

Số điện thoại [redacted]

Địa chỉ [redacted]

Thành phố * [redacted] **Tiểu bang** * [redacted] **Mã bưu chính** * [redacted]

Bình luận *

1) lệ phí qua cầu mỗi lần ? How much/ What is the toll each time?
2) Thời gian thu lệ phí ? How long does it take?
3) Có tăng thêm thuế không? Is the tax going to be increased.

IBR Draft SEIS - RECORD #3922 DETAIL

First Name :	Thuy
Last Name :	Nguyen
Attachments :	DSEIS-3922_Nguyen_Original.pdf (2 mb)

Chương trình thay thế cầu liên bang
500 Broadway, Phòng 200
Vancouver, WA 98660

BẢN DỰ THẢO BIỂU MẪU Ý KIẾN CÔNG CHÚNG SEIS

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- Điện thoại: 866-IBR-SEIS (427-7347)
- Thư: Chương trình thay thế cầu liên bang, *Attn* : Bản thảo ý kiến công chúng của SEIS
  500 Broadway, Phòng 200, Vancouver WA 98660
- Phiên điều trần công khai: Sẽ tổ chức cả phiên điều trần công khai trực tiếp và trực tuyến. Truy cập lịch trực tuyến của chúng tôi tại https://www.interstatebridge.org/get-involved-folder/calendar/ để tìm hiểu thêm.

*** YÊU CẦU**

Ngày * 10/20/24

Tên * THUY **Họ** * NGUYEN

Doanh nghiệp hoặc Tổ chức

Bels

Thư điện tử [redacted]

Số điện thoại [redacted]

Địa chỉ [redacted]

Thành phố * [redacted] **Tiểu bang** * [redacted] **Mã bưu chính** * [redacted]

Bình luận *

Good information to know

AS AN OREGONIAN, I DRIVE ACROSS THIS BRIDGE EVERY MORNING FOR WORK AND TRAFFIC FROM NORTH PORTLAND RESIDENTIAL AREAS JOIN I-5 SOUTHBOUND MAKING THE TRAFFIC VOLUME MORE HIGHER. SPENDING MILLIONS OF DOLLARS FOR A BRIDGE IS NOT EASY AT ALL, BUT IF POSSIBLE, I THINK IT WOULD BE GREAT TO BUILD A NEW BRIDGE TO REDUCE TRAFFIC CONGESTION TIME AS WELL AS AMOUNTS OF ACCIDENTS AND CRASHES. HOPEFULLY, THIS PROJECT WILL BE IMPLEMENTED IN THE NEAR FUTURE.

IBR Draft SEIS - RECORD #3923 DETAIL

First Name :	Dung
Last Name :	Nguyen
Attachments :	DSEIS-3923_Nguyen_Original.pdf (567 kb)

Interstate Bridge Replacement Program
500 Broadway, Suite 200
Vancouver WA 98660

DRAFT SEIS PUBLIC COMMENT FORM

Public Comment must be submitted by 11:59 p.m. PST Monday, Nov. 18, 2024. Comments can be provided in your native language. Language interpretation and ASL services can also be made available upon request.

How to submit public comment:

- Online: https://www.interstatebridge.org/DraftSEIS
- Email: draftseis@interstatebridge.org. Please include "Draft SEIS public comment" in the subject line.
- Phone: 866-IBR-SEIS (427-7347)
- Mail: Interstate Bridge Replacement Program, *Attn*: Draft SEIS Public Comment
  500 Broadway, Suite 200, Vancouver WA 98660
- Public Hearings: Both in-person and virtual public hearing opportunities will be held. Visit our online calendar at https://www.interstatebridge.org/get-involved-folder/calendar/ to learn more.

*REQUIRED

Date* 10/20/2024

First Name* Dung ~~Nguyen~~ **Last Name*** Nguyen

Business or Organization CELS.

Email [redacted]

Phone Number [redacted]

Address [redacted]

City* [redacted] **State*** [redacted] **Zip Code*** [redacted]

Comment*

Comment **Page 2**

- Thu phí trong bao lâu và giá phí là bao nhiêu?
- ~~Bao~~ có thu phí làng đường cho người đi bộ và xe đạp không?

- How much is the toll & it takes for how long?
- Is there toll for walkers & bikers?

If more space is needed for public comment, please add additional pages.

IBR Draft SEIS - RECORD #3924 DETAIL

First Name :	Richard
Last Name :	Daesen
Attachments :	DSEIS-3924_Daesen_Original.pdf (515 kb)

Chương trình thay thế cầu liên bang
500 Broadway, Phòng 200
Vancouver, WA 98660

BẢN DỰ THẢO BIỂU MẪU Ý KIẾN CÔNG CHÚNG SEIS

Bình luận của công chúng phải được gửi trước 11:59 tối PST Thứ Hai, ngày 18 tháng 11 năm 2024. Bạn có thể cung cấp bình luận bằng ngôn ngữ mẹ đẻ của mình. Dịch vụ phiên dịch ngôn ngữ và ASL cũng có thể được cung cấp theo yêu cầu.

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- Điện thoại: 866-IBR-SEIS (427-7347)
- Thư: Chương trình thay thế cầu liên bang, *Attn* : Bản thảo ý kiến công chúng của SEIS
  500 Broadway, Phòng 200, Vancouver WA 98660
- Phiên điều trần công khai: Sẽ tổ chức cả phiên điều trần công khai trực tiếp và trực tuyến. Truy cập lịch trực tuyến của chúng tôi tại https://www.interstatebridge.org/get-involved-folder/calendar/ để tìm hiểu thêm.

* YÊU CẦU

Ngày * 10/20/2024

Tên * Richard **Họ** * Daesen

Doanh nghiệp hoặc Tổ chức

_____

Thư điện tử _____

Số điện thoại _____

Địa chỉ _____

Thành phố * _____ **Tiểu bang** * _____ **Mã bưu chính** * _____

_____

Gửi bình luận *Yêu cầu*

Tên * Richard Họ * Dalsen

Doanh nghiệp hoặc Tổ chức [redacted]

Email (nhập N/A nếu không có) * [redacted]

Số điện thoại [redacted]

Địa chỉ [redacted]

Thành phố * [redacted]

Tỉnh trạng [redacted]

Mã bưu chính * [redacted]

Bình luận *

Các bình luận được gửi qua mạng xã hội và các cuộc trò chuyện không chính thức sẽ không được ghi nhận là bình luận chính thức. Để đảm bảo hồ sơ hành chính phản ánh chính xác và đầy đủ các tài liệu nhận được trong thời gian lấy ý kiến công chúng, các ý kiến bằng văn bản không được bao gồm bất kỳ siêu liên kết nào đến tài liệu hoặc thông tin bên ngoài. Bất kỳ tài liệu hoặc thông tin nào mà người bình luận muốn xem xét đều phải được đưa vào bình luận đã gửi. Tệp đính kèm trong email phải được trích dẫn cụ thể trong phần bình luận, bao gồm trích dẫn cụ thể đến số trang và đoạn trích trong tệp đính kèm. Tất cả các tệp đính kèm âm thanh/video phải được ghi lại hoặc gửi qua đường dây thư thoại Dự thảo SEIS.
Để giúp chúng tôi hiểu được sở thích và mối quan tâm của bạn, chúng tôi khuyên bạn nên nêu cụ thể và bao gồm thông tin chi tiết nếu có thể. Ví dụ: "Phân tích nên xem xét các tác động tiềm tàng từ XYZ" hoặc "Tôi muốn thấy biện pháp giảm thiểu bổ sung cho XYZ".

Đăng ký để nhận thông tin cập nhật

Need To replace The old bridge, Want To Know about how They will replace iT (who iT impacTs)

IBR Draft SEIS - RECORD #3925 DETAIL

First Name :	Long
Last Name :	Pham
Attachments :	DSEIS-3925_Pham_Original.pdf (611 kb)

Interstate BRIDGE Replacement Program

Chương trình thay thế cầu liên bang
500 Broadway, Phòng 200
Vancouver, WA 98660

BẢN DỰ THẢO BIỂU MẪU Ý KIẾN CÔNG CHÚNG SEIS

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* YÊU CẦU

Ngày * 10/20/28

Tên * LONG **Họ** * PHAM

Doanh nghiệp hoặc Tổ chức

CELS

Thư điện tử [redacted]

Số điện thoại [redacted]

Địa chỉ

Thành phố * [redacted] **Tiểu bang** * [redacted] **Mã bưu chính** * [redacted]

Bình luận *

① impact of traffic to the busuness around the area,

② where the money comes from? Tax?.

I have seen a lot of projects done by the States, city of Portland. mismanaged. waste of money, did not work. fyi, look at the projects on the Division / or Powell Blvd. It looks unbelievable. more traffic & problems

If this project takes more than than expected, more cost to pay. I understand more people, more streets, & bridges needed. But I am asking the State to invest more time to plan before execution

IBR Draft SEIS - RECORD #3926 DETAIL

First Name :	Nguyet
Last Name :	Le
Attachments :	DSEIS-3926_Le_Original.pdf (496 kb)

Interstate BRIDGE Replacement Program

Chương trình thay thế cầu liên bang
500 Broadway, Phòng 200
Vancouver, WA 98660

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* YÊU CẦU

Ngày * 10/20/2024

Tên * NGUYET **Họ** * LE

Doanh nghiệp hoặc Tổ chức

CELS

Thư điện tử [redacted]

Số điện thoại _____

Địa chỉ _____

Thành phố * [redacted] **Tiểu bang** * [redacted] **Mã bưu chính** * [redacted]

Bình luận *

1. When will residents start paying to cross the bridge?
2. How long will we pay the fee. any estimated time frame?
3. Will bikes cross free?
4. Do you plan for monthly pass per car/per family?
5. The total cost is about 4.5mil. Federal grants 600mil oregon contributes 1.[illegible] + Washington contributes 1B. Who will cover the different?

IBR Draft SEIS - RECORD #3927 DETAIL

First Name :	Hieu
Last Name :	Nguyen
Attachments :	DSEIS-3927_Nguyen_Original.pdf (783 kb)

Chương trình thay thế cầu liên bang
500 Broadway, Phòng 200
Vancouver, WA 98660

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* YÊU CẦU

Ngày * 10/20/2024

Tên * Hieu **Họ** * Nguyen

Doanh nghiệp hoặc Tổ chức

CELS

Thư điện tử [redacted]

Số điện thoại [redacted]

Địa chỉ _____

Thành phố * [redacted] **Tiểu bang** * [redacted] **Mã bưu chính** * [redacted]

Bình luận *

1) The plan for this project is about 7.5 bill. WA support 1 billion, Oregon support 1 billion and federal support 600 million, so who is a sponter the cost remaining?

2) whe the project start, the POT will be start until when? and how much for the price.

IBR Draft SEIS - RECORD #3928 DETAIL

First Name :	Quoc Tuan
Last Name :	Hoang
Attachments :	DSEIS-3928_Hoang_Original.pdf (425 kb)

Chương trình thay thế cầu liên bang
500 Broadway, Phòng 200
Vancouver, WA 98660

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* YÊU CẦU

Ngày * 10/20/24

Tên * Quoc Tuan **Họ** * Hoang

Doanh nghiệp hoặc Tổ chức

CELS

Thư điện tử [redacted]

Số điện thoại [redacted]

Địa chỉ [redacted]

Thành phố * [redacted] **Tiểu bang** * [redacted] **Mã bưu chính** * [redacted]

Bình luận *

Will tax ~~be proposed~~ increasing?
~~will~~ Pedestrian be charged?
what will the fee be?
~~How~~ will the fee ~~be~~ processed?

IBR Draft SEIS - RECORD #3929 DETAIL

First Name :	Tan
Last Name :	Le
Attachments :	DSEIS-3929_Le_Original.pdf (732 kb)

Chương trình thay thế cầu liên bang
500 Broadway, Phòng 200
Vancouver, WA 98660

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* YÊU CẦU

Ngày * 10/20/24

Tên * Tam Le **Họ** * Le

Doanh nghiệp hoặc Tổ chức

CELS

Thư điện tử [redacted]

Số điện thoại [redacted]

Địa chỉ [redacted]

Thành phố * [redacted] **Tiểu bang** * [redacted] **Mã bưu chính** * [redacted]

Bình luận *

Will be charged Toll Fee for all kinds of Vehicles?
How long will be done?
Will be charged for tax to employees.

Gửi bình luận *Yêu cầu*

Tên * Tan Họ * Le

Doanh nghiệp hoặc Tổ chức CELS

Email (nhập N/A nếu không có) * [redacted]

Số điện thoại [redacted]

Địa chỉ [redacted]

Thành phố * [redacted]

Tình trạng * [redacted]

Mã bưu chính * [redacted]

Bình luận *

Will Charge tollFee for car, or kinds of Vehicles?
How long will be done?
will charg Stansportation tax Fee.

IBR Draft SEIS - RECORD #3930 DETAIL

First Name :	Khiet
Last Name :	Le
Attachments :	DSEIS-3930_Le_Original.pdf (335 kb)

Gửi bình luận *Yêu cầu*

Tên * Khiet Họ * Le

Doanh nghiệp hoặc Tổ chức

Email (nhập N/A nếu không có) *

Số điện thoại [redacted]

Địa chỉ [redacted]

Thành phố * [redacted]

Tình trạng * [redacted]

Mã bưu chính *

Bình luận *

- Rất mong chính phủ thực hiện nhanh chóng dự án này vì rất nhiều lợi ích sau:
  - Tạo công ăn việc làm cho người dân
  - Giảm được chi phí cho người sản xuất, người phân phối và người tiêu dùng khi có cây cầu mới tiện nghi như kế hoạch
  - Do sự biến đổi khí hậu hiện tại, việc xây dựng nên lưu ý vào việc chống động đất, chịu được những lực đặc biệt tạo ra từ các cơn gió mạnh, bão bất ngờ.

Wish the government quickly gets this project done because of lots of benefits:

- Create jobs for people in the community
- Decrease expenses of production, producers, & the users when the new bridge built as planned.
- Because of weather change recently, the building process need to be more aware / pay more attention in earthquake prevention, strong enough to survive during tornado, whirlpool storms.

IBR Draft SEIS - RECORD #3931 DETAIL

First Name :	Tony
Last Name :	Huynh
Attachments :	DSEIS-3931_Huynh_Original.pdf (333 kb)

Gửi bình luận *Yêu cầu*

Tên * Tony Họ * Huynh

Doanh nghiệp hoặc Tổ chức

Email (nhập N/A nếu không có) * [redacted]

Số điện thoại [redacted]

Địa chỉ [redacted]

Thành phố * [redacted]

Tình trạng * [redacted]

Mã bưu chính * [redacted]

Bình luận * Rude - dere bridge

Các bình luận được gửi qua mạng xã hội và các cuộc trò chuyện không chính thức sẽ không được ghi nhận là bình luận chính thức. Để đảm bảo hồ sơ hành chính phản ánh chính xác và đầy đủ các tài liệu nhận được trong thời gian lấy ý kiến công chúng, các ý kiến bằng văn bản không được bao gồm bất kỳ siêu liên kết nào đến tài liệu hoặc thông tin bên ngoài. Bất kỳ tài liệu hoặc thông tin nào mà người bình luận muốn xem xét đều phải được đưa vào bình luận đã gửi. Tệp đính kèm trong email phải được trích dẫn cụ thể trong phần bình luận, bao gồm trích dẫn cụ thể đến số trang và đoạn trích trong tệp đính kèm. Tất cả các tệp đính kèm âm thanh/video phải được ghi lại hoặc gửi qua đường dây thư thoại Dự thảo SEIS.
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Đăng ký để nhận thông tin cập nhật

I think that the I-5 bridge desperately needs an upgrade and fast. While it's important and beneficial to have a single-level movable bridge, I think to properly address the congestion, safety, and limited public transportation issues, a double-deck bridge would be the best option for the I-5 bridge model.

IBR Draft SEIS - RECORD #3932 DETAIL

First Name :	Thao
Last Name :	Nguyen
Attachments :	DSEIS-3932_Nguyen_Original.pdf (436 kb)

Interstate BRIDGE Replacement Program

Interstate Bridge Replacement Program
500 Broadway, Suite 200
Vancouver WA 98660

DRAFT SEIS PUBLIC COMMENT FORM

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*REQUIRED

Date* 10/19/24

First Name* Thao **Last Name*** Nguyen

Business or Organization individual / CCS

Email [redacted]

Phone Number [redacted]

Address [redacted]

City* [redacted] **State*** [redacted] **Zip Code*** [redacted]

Comment*

I am curious about how the project is funded & how our community can support the project. I totally support the project to if the bridge can solve the traffic problems and create more jobs for the community

IBR Draft SEIS - RECORD #3933 DETAIL

First Name :	Trevor
Last Name :	McManis
Attachments :	DSEIS-3933_McManis_Original.pdf (326 kb)

Interstate BRIDGE Replacement Program

Interstate Bridge Replacement Program
500 Broadway, Suite 200
Vancouver WA 98660

DRAFT SEIS PUBLIC COMMENT FORM

Public Comment must be submitted by 11:59 p.m. PST Monday, Nov. 18, 2024. Comments can be provided in your native language. Language interpretation and ASL services can also be made available upon request.

How to submit public comment:

- Online: https://www.interstatebridge.org/DraftSEIS
- Email: draftseis@interstatebridge.org. Please include "Draft SEIS public comment" in the subject line.
- Phone: 866-IBR-SEIS (427-7347)
- Mail: Interstate Bridge Replacement Program, *Attn*: Draft SEIS Public Comment
  500 Broadway, Suite 200, Vancouver WA 98660
- Public Hearings: Both in-person and virtual public hearing opportunities will be held. Visit our online calendar at https://www.interstatebridge.org/get-involved-folder/calendar/ to learn more.

*REQUIRED

Date* 10/19/2024

First Name* Trevor **Last Name*** McManis

Business or Organization individual

Email [redacted]

Phone Number [redacted]

Address [redacted]

City* [redacted] **State*** [redacted] **Zip Code*** [redacted]

Comment*

This was an informative session. I will research more about the proposed toll and construction styles of bridges. I would be curious about how the bridge will be paid for and if the authorization of the project will take place via vote

IBR Draft SEIS - RECORD #3934 DETAIL

First Name :	Cuong
Last Name :	Le
Attachments :	DSEIS-3934_Le_Original.pdf (3 mb)

Interstate BRIDGE Replacement Program

Interstate Bridge Replacement Program
500 Broadway, Suite 200
Vancouver WA 98660

DRAFT SEIS PUBLIC COMMENT FORM

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- Phone: 866-IBR-SEIS (427-7347)
- Mail: Interstate Bridge Replacement Program, *Attn*: Draft SEIS Public Comment
  500 Broadway, Suite 200, Vancouver WA 98660
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***REQUIRED**

Date* 10/22/2024

First Name* CUONG **Last Name*** LE

Business or Organization _____

Email [redacted]

Phone Number _____

Address _____

City* [redacted] **State*** [redacted] **Zip Code*** [redacted]

Comment*

Thank you for sharing Interstate Bridge Replacement Project and I agree With that.
But the most thing I concern is about the traffic when you are working on the bridge. Could you please do not close the bridge at working hours.

Comment

to avoid traffic jams.

And please inform us your construction time you planned not only on the LED signs, but also send mail to let us know because last time, you close the street near my house, you put the LED signs on the street that we don't go every day, then, my son need to use GPS to find another street and he got accident. If we know the heads up about the street close information we could change our appointment or search the new road at home before we drive.

I suggest you work on double deck fixed span to have more lanes to reduce traffic.

And about tolling I think you should collect fees depend on the percentage of salary to ensure equity

If more space is needed for public comment, please add additional pages.

IBR Draft SEIS - RECORD #3935 DETAIL

First Name :	Phuc
Last Name :	Nguyen
Attachments :	DSEIS-3935_Nguyen_Original.pdf (2 mb)

Interstate Bridge Replacement Program
500 Broadway, Suite 200
Vancouver WA 98660

DRAFT SEIS PUBLIC COMMENT FORM

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  500 Broadway, Suite 200, Vancouver WA 98660
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***REQUIRED**

Date* 10/21/2024

First Name* Phuc **Last Name*** Nguyen

Business or Organization _____

Email [redacted]

Phone Number _____

Address _____

City* [redacted] **State*** [redacted] **Zip Code*** [redacted]

Comment*

I agree about Interstate Bridge Replacement project because if an earthquake occurs, it will be very dangerous for the old bridge.

When the bridge is closed, we must be informed

Comment

not only by signs on the road but also by letters sent to the house.
I think double deck fixed span with auxiliary lanes is good because we could have 2 levels. We can have a seperate level for only light rail transit, bus rapid transit and express bus routes.
I also hope we can have methods to reduce air pollution while working on this project, especially avoiding heavy traffic or accidents.

If more space is needed for public comment, please add additional pages.

IBR Draft SEIS - RECORD #3936 DETAIL

First Name :	Ngoc Bao Thi
Last Name :	Nguyen
Attachments :	DSEIS-3936_Nguyen_Original.pdf (624 kb)

Interstate BRIDGE Replacement Program

Interstate Bridge Replacement Program
500 Broadway, Suite 200
Vancouver WA 98660

DRAFT SEIS PUBLIC COMMENT FORM

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- Phone: 866-IBR-SEIS (427-7347)
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  500 Broadway, Suite 200, Vancouver WA 98660
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*REQUIRED

Date* 10/21/2024

First Name* Ngoc Bao Thi **Last Name*** Nguyen

Business or Organization _____

Email [redacted]

Phone Number _____

Address _____

City* [redacted] **State*** [redacted] **Zip Code*** [redacted]

Comment*

I believe the Interstate Bridge Replacement Program (IBRP) is good, in general. It aims to modernize a critical transportation corridor, with positive impacts for both states.

First of all, regarding transportation & structure, I like the new bridge double-level design with more & wider lanes & improving interchanges. It really helps to

Comment

reduce congestion & improving overall transportation safety. But from my viewpoint, I don't think widening the lane for pedestrians & bicyclist is crucial due to the demand. I also really worry about the temporary disruptions to traffic flow during the construction & the time to finish the project, over 10 years.

* I am also concerned about the variable-rate tolling project. I think we should carefully plan to ensure equity in toll implementation.

* About the environment, I know that the new bridge will meet modern seismic standards, reducing the risk of collapse during earthquakes. It's amazing. But when we demolish the old bridge & erect the new one, I hope we can find the way that it wouldn't affect aquatic ecosystem & wildlife during the construction.

If more space is needed for public comment, please add additional pages.

IBR Draft SEIS - RECORD #3937 DETAIL

First Name :	Khanh
Last Name :	Le
Attachments :	DSEIS-3937_Le_Original.pdf (847 kb)

Interstate BRIDGE Replacement Program

Interstate Bridge Replacement Program
500 Broadway, Suite 200
Vancouver WA 98660

DRAFT SEIS PUBLIC COMMENT FORM

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- Email: draftseis@interstatebridge.org. Please include "Draft SEIS public comment" in the subject line.
- Phone: 866-IBR-SEIS (427-7347)
- Mail: Interstate Bridge Replacement Program, *Attn*: Draft SEIS Public Comment
  500 Broadway, Suite 200, Vancouver WA 98660
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***REQUIRED**

Date* 10/18/2024

First Name* Khanh **Last Name*** Le

Business or Organization _____

Email [redacted]

Phone Number _____

Address _____

City* [redacted] **State*** [redacted] **Zip Code*** [redacted]

Comment*

I support the renovation of I5 that ~~ha~~ adds two auxiliary lanes, it is safer for people on the bridge to get on and off in high-speed lanes. Make clear notes of which lanes lead to where in order to create less confusion. I do NOT like the idea of tolling. Why would we

Comment

have to pay to ~~use~~ travel on public bridge/road? If someone were need to use the bridge everyday, this isn't helpful.

Do Double-Deck Fix-span. This option is optimal and easy ~~for~~ and safer for pedestrians and automotive drivers.

If more space is needed for public comment, please add additional pages.

IBR Draft SEIS - RECORD #3938 DETAIL

First Name :	Minh
Last Name :	Le
Attachments :	DSEIS-3938_Le_Original.pdf (561 kb)

Interstate Bridge Replacement Program
500 Broadway, Suite 200
Vancouver WA 98660

DRAFT SEIS PUBLIC COMMENT FORM

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- Phone: 866-IBR-SEIS (427-7347)
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  500 Broadway, Suite 200, Vancouver WA 98660
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***REQUIRED**

Date* 10/18/24

First Name* MINH **Last Name*** LE

Business or Organization _____

Email _____

Phone Number _____

Address _____

City* [redacted] **State*** [redacted] **Zip Code*** [redacted]

Comment*

I vote for Double Deck Fix Span. The existing one is not friendly anymore for everyone using the bridge whether drivers of cars or public transit.
Please consider the project timeline. If too long, it's gonna create traffic jam for many years.

Comment

I hope there won't be toll on the bridge. If there is, please make alternative ways for people. Be mindful of the water & environment under the bridge. Have display about wild life down there for educational ~~purposes~~ purposes.

If more space is needed for public comment, please add additional pages.

IBR Draft SEIS - RECORD #3939 DETAIL

First Name :	Linda
Last Name :	Ricardo
Attachments :	DSEIS-3939_Ricardo_Original.pdf (286 kb)

Interstate Bridge Replacement Program
500 Broadway, Suite 200
Vancouver WA 98660

DRAFT SEIS PUBLIC COMMENT FORM

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- Mail: Interstate Bridge Replacement Program, *Attn*: Draft SEIS Public Comment
  500 Broadway, Suite 200, Vancouver WA 98660
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*REQUIRED

Date* 10/18/24

First Name* Linda **Last Name*** Ricardo

Business or Organization _____

Email [redacted]

Phone Number [redacted]

Address _____

City [redacted] **State*** [redacted] **Zip Code*** [redacted]

Comment*

Need to rebuild strengthens earthquake.

IBR Draft SEIS - RECORD #3940 DETAIL

First Name :	Maikel
Last Name :	Ricardo
Attachments :	DSEIS-3940_Ricardo_Original.pdf (296 kb)

Interstate BRIDGE Replacement Program

Interstate Bridge Replacement Program
500 Broadway, Suite 200
Vancouver WA 98660

DRAFT SEIS PUBLIC COMMENT FORM

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  500 Broadway, Suite 200, Vancouver WA 98660
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*REQUIRED

Date* 10/18/24

First Name* Maikel **Last Name*** Ricardo

Business or Organization

Email [redacted]

Phone Number [redacted]

Address

City* [redacted] **State*** [redacted] **Zip Code*** [redacted]

Comment*

~~agree~~ agree to rebuild to strengthens to hold earthquake.

IBR Draft SEIS - RECORD #3941 DETAIL

First Name :	Hai
Last Name :	Ton
Attachments :	DSEIS-3941_Ton_Original.pdf (2 mb)

Interstate BRIDGE Replacement Program

Interstate Bridge Replacement Program
500 Broadway, Suite 200
Vancouver WA 98660

DRAFT SEIS PUBLIC COMMENT FORM

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*REQUIRED

Date* 10/22/2024

First Name* Hai **Last Name*** Ton

Business or Organization _____

Email [redacted]

Phone Number _____

Address _____

City* [redacted] **State*** [redacted] **Zip Code*** [redacted]

Comment*

I prefer the double-level fixed-span, which can reduce the travel time & congestion. Because of it, we also can reduce noise and air pollution. It is great. But when we dismantle the old bridge & build the new one, please be careful with aquatic ecosyste & environment.

Comment

I have another worry about the traffic flows during the construction. The traffic in ~~pea~~ crush hours are bad now, and obviously, it will be worse during construction period, especially when the construction process expected to last over 10 years. It's really hard for commuters ~~identify~~ local economies there in the short-terms. we need to find ways to minimize negative impacts.

If more space is needed for public comment, please add additional pages.

IBR Draft SEIS - RECORD #3942 DETAIL

First Name :	Thang
Last Name :	Le
Attachments :	DSEIS-3942_Le_Original.pdf (396 kb)

Interstate BRIDGE Replacement Program

Interstate Bridge Replacement Pro
500 Broadway, Suite 200
Vancouver WA 98660

DRAFT SEIS PUBLIC COMMENT FORM

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- Email: draftseis@interstatebridge.org. Please include "Draft SEIS public comment" in the subject line.
- Phone: 866-IBR-SEIS (427-7347)
- Mail: Interstate Bridge Replacement Program, *Attn*: Draft SEIS Public Comment
  500 Broadway, Suite 200, Vancouver WA 98660
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*REQUIRED

Date* 10/23/24

First Name* Thang **Last Name*** Le

Business or Organization _____

Email [redacted]

Phone Number [redacted]

Address [redacted]

City* [redacted] **State*** [redacted] **Zip Code*** [redacted]

Comment*

I liked the double-decke, fixed-span because its design has more space and solve the traffic issues

IBR Draft SEIS - RECORD #3943 DETAIL

First Name :	Vu
Last Name :	Hong
Attachments :	DSEIS-3943_Hong_Original.pdf (2 mb)

Interstate BRIDGE Replacement Program

Interstate Bridge Replacement Program
500 Broadway, Suite 200
Vancouver WA 98660

DRAFT SEIS PUBLIC COMMENT FORM

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- Email: draftseis@interstatebridge.org. Please include "Draft SEIS public comment" in the subject line.
- Phone: 866-IBR-SEIS (427-7347)
- Mail: Interstate Bridge Replacement Program, *Attn*: Draft SEIS Public Comment
  500 Broadway, Suite 200, Vancouver WA 98660
- Public Hearings: Both in-person and virtual public hearing opportunities will be held. Visit our online calendar at https://www.interstatebridge.org/get-involved-folder/calendar/ to learn more.

***REQUIRED**

Date* 10/23/2024

First Name* VU **Last Name*** HONG

Business or Organization _____

Email [redacted]

Phone Number _____

Address _____

City* [redacted] **State*** [redacted] **Zip Code*** [redacted]

Comment*

The most I concern about this project is on traffic and air pollution. I think if you close the lane for this project, you should close only 1 lane at out of working hours to minimize traffic congestion

Comment

I Suggest we Should Working on double deck fixed Span with auxiliary lanes to have more lanes for avoiding trayfic. We Should have a Seperate lane for public transportation. and opening emergency lanes is important to reduce accidents and increase Sazety.

Because this is a big project and take long time to finish, you Should Send mail and inyorm the dates and time that you are planning to work on this project to all residents.

If more space is needed for public comment, please add additional pages.

IBR Draft SEIS - RECORD #3944 DETAIL

First Name :	Nhu
Last Name :	Hoang
Attachments :	DSEIS-3944_Hoang_Original.pdf (1 mb)

Interstate BRIDGE Replacement Program

Interstate Bridge Replacement Program
500 Broadway, Suite 200
Vancouver WA 98660

DRAFT SEIS PUBLIC COMMENT FORM

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- Mail: Interstate Bridge Replacement Program, *Attn*: Draft SEIS Public Comment
  500 Broadway, Suite 200, Vancouver WA 98660
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***REQUIRED**

Date* 10/22/24

First Name* Nhu **Last Name*** Hoang

Business or Organization _____

Email [redacted]

Phone Number [redacted]

Address [redacted]

City* [redacted] **State*** [redacted] **Zip Code*** [redacted]

Comment*

I' like the single-level fixed span extradosed design because it looks nice and safe with the lines along the bridge

IBR Draft SEIS - RECORD #3945 DETAIL

First Name :	Nhu
Last Name :	Nguyen
Attachments :	DSEIS-3945_Nguyen_Original.pdf (863 kb)

Interstate BRIDGE Replacement Program

Interstate Bridge Replacement Program
500 Broadway, Suite 200
Vancouver WA 98660

DRAFT SEIS PUBLIC COMMENT FORM

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  500 Broadway, Suite 200, Vancouver WA 98660
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***REQUIRED**

Date* 10/22/24

First Name* NHU **Last Name*** NGUYEN

Business or Organization _____

Email [redacted]

Phone Number _____

Address _____

City* [redacted] **State*** [redacted] **Zip Code*** [redacted]

Comment*

I think this project is crucial and major impacts for OR & WA This help creating employments, more transportation efficiency once the project complete As for concern, I think the #1 on my mind will definetly how traffic will effect the

Comment

communities from both OR ; WA state. The tolling will also going ~~be~~ to be a big learning curve for a lot of residents since they are not familiar with the process and there are challenges with low-income individual that can use some assistance, or ~~have~~ a discount. In conclusion, ~~this is perfect~~ I'm looking forward to see this break ground and hoping the overseeing team will have a good strategies and community involvement.

Thank you.

If more space is needed for public comment, please add additional pages.

IBR Draft SEIS - RECORD #3946 DETAIL

First Name :	Ha Lam
Last Name :	Hoang
Attachments :	DSEIS_3946_Hoang_Original.pdf (440 kb)

Chương trình thay thế cầu liên bang
500 Broadway, Phòng 200
Vancouver, WA 98660

BẢN DỰ THẢO BIỂU MẪU Ý KIẾN CÔNG CHÚNG SEIS

Bình luận của công chúng phải được gửi trước 11:59 tối PST Thứ Hai, ngày 18 tháng 11 năm 2024. Bạn có thể cung cấp bình luận bằng ngôn ngữ mẹ đẻ của mình. Dịch vụ phiên dịch ngôn ngữ và ASL cũng có thể được cung cấp theo yêu cầu.

Cách gửi bình luận công khai:

- Trực tuyến: https://www.interstatebridge.org/DraftSEIS
- Email: draftseis@interstatebridge.org . Vui lòng ghi "Dự thảo ý kiến công chúng về SEIS" vào dòng tiêu đề.
- Điện thoại: 866-IBR-SEIS (427-7347)
- Thư: Chương trình thay thế cầu liên bang, *Attn* : Bản thảo ý kiến công chúng của SEIS
  500 Broadway, Phòng 200, Vancouver WA 98660
- Phiên điều trần công khai: Sẽ tổ chức cả phiên điều trần công khai trực tiếp và trực tuyến. Truy cập lịch trực tuyến của chúng tôi tại https://www.interstatebridge.org/get-involved-folder/calendar/ để tìm hiểu thêm.

* YÊU CẦU

Ngày * 10/17/24

Tên * (HOÀNG) HÀ LAM **Họ** * HOÀNG

Doanh nghiệp hoặc Tổ chức

CELS

Thư điện tử [redacted]

Số điện thoại [redacted]

Địa chỉ [redacted]

Thành phố * [redacted] **Tiểu bang** * [redacted] **Mã bưu chính** * [redacted]

Bình luận *

good informations

IBR Draft SEIS - RECORD #3947 DETAIL

First Name :	Hong
Last Name :	Huynh
Attachments :	DSEIS_3947_Huynh_Original.pdf (507 kb)

Chương trình thay thế cầu liên bang
500 Broadway, Phòng 200
Vancouver, WA 98660

BẢN DỰ THẢO BIỂU MẪU Ý KIẾN CÔNG CHÚNG SEIS

Bình luận của công chúng phải được gửi trước 11:59 tối PST Thứ Hai, ngày 18 tháng 11 năm 2024. Bạn có thể cung cấp bình luận bằng ngôn ngữ mẹ đẻ của mình. Dịch vụ phiên dịch ngôn ngữ và ASL cũng có thể được cung cấp theo yêu cầu.

Cách gửi bình luận công khai:

- Trực tuyến: https://www.interstatebridge.org/DraftSEIS
- Email: draftseis@interstatebridge.org . Vui lòng ghi "Dự thảo ý kiến công chúng về SEIS" vào dòng tiêu đề.
- Điện thoại: 866-IBR-SEIS (427-7347)
- Thư: Chương trình thay thế cầu liên bang, *Attn* : Bản thảo ý kiến công chúng của SEIS
  500 Broadway, Phòng 200, Vancouver WA 98660
- Phiên điều trần công khai: Sẽ tổ chức cả phiên điều trần công khai trực tiếp và trực tuyến. Truy cập lịch trực tuyến của chúng tôi tại https://www.interstatebridge.org/get-involved-folder/calendar/ để tìm hiểu thêm.

*** YÊU CẦU**

Ngày * 10-17-2024

Tên * Hong **Họ** * Huynh

Doanh nghiệp hoặc Tổ chức

CELS

Thư điện tử _____

Số điện thoại [redacted]

Địa chỉ [redacted]

Thành phố * [redacted] **Tiểu bang** * [redacted] **Mã bưu chính** * [redacted]

Bình luận *

Biết được thêm thông tin hay

Knowing very great information

IBR Draft SEIS - RECORD #3948 DETAIL

First Name :	Thong
Last Name :	Le
Attachments :	DSEIS_3948_Le_Original.pdf (474 kb)

Chương trình thay thế cầu liên bang
500 Broadway, Phòng 200
Vancouver, WA 98660

BẢN DỰ THẢO BIỂU MẪU Ý KIẾN CÔNG CHÚNG SEIS

Bình luận của công chúng phải được gửi trước 11:59 tối PST Thứ Hai, ngày 18 tháng 11 năm 2024. Bạn có thể cung cấp bình luận bằng ngôn ngữ mẹ đẻ của mình. Dịch vụ phiên dịch ngôn ngữ và ASL cũng có thể được cung cấp theo yêu cầu.

Cách gửi bình luận công khai:

- Trực tuyến: https://www.interstatebridge.org/DraftSEIS
- Email: draftseis@interstatebridge.org . Vui lòng ghi "Dự thảo ý kiến công chúng về SEIS" vào dòng tiêu đề.
- Điện thoại: 866-IBR-SEIS (427-7347)
- Thư: Chương trình thay thế cầu liên bang, *Attn* : Bản thảo ý kiến công chúng của SEIS
  500 Broadway, Phòng 200, Vancouver WA 98660
- Phiên điều trần công khai: Sẽ tổ chức cả phiên điều trần công khai trực tiếp và trực tuyến. Truy cập lịch trực tuyến của chúng tôi tại https://www.interstatebridge.org/get-involved-folder/calendar/ để tìm hiểu thêm.

*** YÊU CẦU**

Ngày * 10/11/2024

Tên * Thuong **Họ** * Le

Doanh nghiệp hoặc Tổ chức

CELS

Thư điện tử _____

Số điện thoại [redacted]

Địa chỉ [redacted]

Thành phố * [redacted] **Tiểu bang** * [redacted] **Mã bưu chính** * [redacted]

Bình luận *

- Cung cấp thông tin chi tiết
Provide detailed information

IBR Draft SEIS - RECORD #3949 DETAIL

First Name :	Shannon
Last Name :	Limmett
Attachments :	DSEIS_3949_Limmett_Original.pdf (186 kb)

Interstate BRIDGE Replacement Program

Interstate Bridge Replacement Program
500 Broadway, Suite 200
Vancouver WA 98660

DRAFT SEIS PUBLIC COMMENT FORM

Public Comment must be submitted by 11:59 p.m. PST Monday, Nov. 18, 2024. Comments can be provided in your native language. Language interpretation and ASL services can also be made available upon request.

How to submit public comment:

- Online: https://www.interstatebridge.org/DraftSEIS
- Email: draftseis@interstatebridge.org. Please include "Draft SEIS public comment" in the subject line.
- Phone: 866-IBR-SEIS (427-7347)
- Mail: Interstate Bridge Replacement Program, *Attn*: Draft SEIS Public Comment
  500 Broadway, Suite 200, Vancouver WA 98660
- Public Hearings: Both in-person and virtual public hearing opportunities will be held. Visit our online calendar at https://www.interstatebridge.org/get-involved-folder/calendar/ to learn more.

***REQUIRED**

Date* 10-17-2024

First Name* Shannon **Last Name*** Slimmett

Business or Organization Portland State University Student

Email [redacted]

Phone Number [redacted]

Address [redacted]

City* [redacted] **State*** [redacted] **Zip Code*** [redacted]

Comment*

I Belive Public Transit and Bike acces should be an important part of the new Bridge. Please do not make a new lift Bridge.

IBR Draft SEIS - RECORD #3950 DETAIL

First Name :	Karen
Last Name :	Madsen
Attachments :	DSEIS_3950_Madsen_Original.pdf (1 mb)

Interstate Bridge Replacement Program
500 Broadway, Suite 200
Vancouver WA 98660

DRAFT SEIS PUBLIC COMMENT FORM

Public Comment must be submitted by 11:59 p.m. PST Monday, Nov. 18, 2024. Comments can be provided in your native language. Language interpretation and ASL services can also be made available upon request.

How to submit public comment:

- Online: https://www.interstatebridge.org/DraftSEIS
- Email: draftseis@interstatebridge.org. Please include "Draft SEIS public comment" in the subject line.
- Phone: 866-IBR-SEIS (427-7347)
- Mail: Interstate Bridge Replacement Program, *Attn*: Draft SEIS Public Comment
  500 Broadway, Suite 200, Vancouver WA 98660
- Public Hearings: Both in-person and virtual public hearing opportunities will be held. Visit our online calendar at https://www.interstatebridge.org/get-involved-folder/calendar/ to learn more.

*REQUIRED

Date* Oct 17 2024

First Name* Karen **Last Name*** Madsen

Business or Organization _____

Email [redacted]

Phone Number [redacted]

Address [redacted]

City* [redacted] **State*** [redacted] **Zip Code*** [redacted]

Comment*

MAX LIGHT RAIL STATIONS NEED TO REQUIRE PURCHASED TICKET TO ENTER OR LEAVE - TRIMET NEED NO CANS/NO BOTTLES ON TRAINS - LIKE CTRAN - LIBRARY NEED PARKING LIKE PROMISED IN ORIGINAL PLAN. TOLLS THAT START DURING CONSTRUCTION NEED →

Comment

TO OFFER DOWNTOWN UPTOWN & WEST NEIGHBOOD RESIDENCE DISCOUNTS FOR PUTTING UP WITH CONSTRUCTION — WEST SIDE BUSINESS & RESIDENTS WILL BE IMPACTED THE MOST.

SAFETY OF LIGHT RAIL IS IMPORTANT ESPAILY WITH THE CAN DEPOSIT ISSUES AND THE DEPOSIT RECYCLE LOCATION NEED TO MOVE TO A CENTRAL LOCATION LIKE THE CONVENTION CENTER.

FOURTH PLAIN & SR 500 SOUTH NEED MORE ROOM TO MERGE.

If more space is needed for public comment, please add additional pages.

IBR Draft SEIS - RECORD #3951 DETAIL

First Name :	Ngoc
Last Name :	Nguyen
Attachments :	DSEIS_3951_Nguyen_Original.pdf (421 kb)

Interstate Bridge Replacement Program
500 Broadway, Suite 200
Vancouver WA 98660

DRAFT SEIS PUBLIC COMMENT FORM

Public Comment must be submitted by 11:59 p.m. PST Monday, Nov. 18, 2024. Comments can be provided in your native language. Language interpretation and ASL services can also be made available upon request.

How to submit public comment:

- Online: https://www.interstatebridge.org/DraftSEIS
- Email: draftseis@interstatebridge.org. Please include "Draft SEIS public comment" in the subject line.
- Phone: 866-IBR-SEIS (427-7347)
- Mail: Interstate Bridge Replacement Program, *Attn*: Draft SEIS Public Comment
  500 Broadway, Suite 200, Vancouver WA 98660
- Public Hearings: Both in-person and virtual public hearing opportunities will be held. Visit our online calendar at https://www.interstatebridge.org/get-involved-folder/calendar/ to learn more.

***REQUIRED**

Date* 10/17/2024

First Name* Ngoc **Last Name*** Nguyen

Business or Organization cels

Email [redacted]

Phone Number [redacted]

Address [redacted]

City* [redacted] **State*** [redacted] **Zip Code*** [redacted]

Comment*

The event regarding Interstate Bridge Replacement Program provides helpful information to the public. This program will have great impact to the community in both Vancouver and Portland area. Hopefully, this will bring positivity and improvement to the public.

IBR Draft SEIS - RECORD #3952 DETAIL

First Name :	Jurell
Last Name :	Scott
Attachments :	DSEIS_3952_Scott_Original.pdf (119 kb)

Submit a comment *Required*

First Name * Jarell Last Name * Scott

Business or Organization Photoshoot Joy LLC

Email (enter N/A if none) * [redacted]

Phone Number [redacted]

Address

City * [redacted]

State * [redacted]

Zip Code * [redacted]

Comment *

Excited for the bridge to be completed it's very much needed + long overdue.

A key thing is the economic effect it will have on Portland/Vancouver. I hope there is a strong intention on outreach to small/local businesses to work on the bridge.

So glad public transportation will be better at getting across the bridge! Very much needed

Noise is a big concern, I hope residents can sleep and not be drastically affected by noise. Some noise blockers are key

IBR Draft SEIS - RECORD #3953 DETAIL

First Name :	Marty
Last Name :	Slapikas
Attachments :	DSEIS_3953_Slapikas_Original.pdf (373 kb)

Submit a comment *Required*

First Name * Marty Last Name * Slapikas

Business or Organization

Email (enter N/A if none) *

Phone Number

Address

City * [redacted]

State * [redacted]

Zip Code * [redacted]

Comment *

Does anyone know of a bridge that would withstand the cascade Subduction Zone repurpose the I-5 Interstate Bridge program funds to design, build & complete one of 2 alternative Columbia River Crossings by either bridge, tunnel or both to provide additional seismically resilit crossings that create lifelines for the populace & freight caught in the expected CSZ earthquake, magnitude 8-9

IBR Draft SEIS - RECORD #3954 DETAIL

First Name :	Bruce
Last Name :	Cahn
Attachments :	Greenberry_Industrial_LLC_Original.pdf (171 kb)

LANE POWELL

BRUCE H. CAHN
[redacted]

November 14, 2024

VIA REGULAR MAIL

IBR Program Draft SEIS
c/o Chris Regan
500 Broadway Street, Suite 200
Vancouver, WA 98660

Re: Comments of Greenberry Industrial LLC to Interstate Bridge Replacement Program Draft Supplemental Environmental Impact Statement

Dear Mr. Regan:

We provide the following comments of Greenberry Industrial LLC (a wholly owned subsidiary of NAES) ("Greenberry") to the Draft Supplemental Environmental Impact Statement ("SEIS") of the Interstate Bridge Replacement Program ("IBR Program") issued on September 20, 2024. These comments are provided pursuant to 40 CFR §1503.1.

As you may be aware, Greenberry is identified in the SEIS as one of "three industrial fabricators with large freight shipments [that] have vertical clearance requirements greater than the clearance provided by the Modified LPA with either fixed-span configuration." SEIS, Section 3.2 (Navigation), page 3.2-11. Section 3.1 of the SEIS specifically acknowledges that "bridge openings are needed for some government vessels, tall ships and sailboats, floating construction equipment, larger ocean-going tugs or vessels, **and specialty shipments from area fabricators** that require more than 72 feet of vertical navigation clearance." SEIS, Section 3.1 (Transportation), page 3.1-12 (emphasis added).[1]

[1] Despite this, the IBR Program further asserts in the SEIS that "Overall, the Modified LPA is expected to result in little to no indirect impact to upstream marine-dependent land uses." SEIS, Section 3.2 (Navigation), page 3.2-17. For the reasons Greenberry has provided separately to the IBR Program previously, Greenberry strongly disagrees with this statement and will in fact be severely impacted by the reduced height fixed span design in the Modified Locally Preferred Alternative ("Modified LPA").

These impacts are addressed elsewhere in the SEIS. Specifically, Section 3.4 (Land Use and Economics) provides:

- "Vessels or cargo shipments unable to pass beneath a fixed-span configuration *could result in economic impacts including increased production costs, reduced potential for future work, and reduced employment opportunities in the region.* Affected fabricators could continue to seek contracts for products that exceed the bridges' vertical clearance but would require securing a downriver satellite site to complete final assembly and could incur higher costs."[2] Section 3.4 (Land Use and Economics), page 3.4-34 (emphasis added).

- "Nevertheless, a fixed-span configuration with 116 feet of vertical clearance *would permanently deny access under the bridges to mariners who require vertical clearances of greater than 116 feet for the 100+ year service life span of the bridges.*" Section 3.4 (Land Use and Economics), page 3.4-35 (emphasis added).

As a result of this acknowledged impact, the SEIS provides further that "[t]he Modified LPA with a fixed-span configuration would have long-term effects to marine-based operations currently operating on the Columbia River, including five vessels and three upstream fabricators when shipping large cargo requiring VNC over 116 feet. Under the double-deck and single-level fixed-span configurations, these vessels and cargo shipments would be unable to transit beneath the new Columbia River bridges in either some conditions when river levels approach or exceed ordinary high water levels or be permanently precluded from transiting the bridge." SEIS, Section 3.2 (Navigation), page 3.2-18.

Further, the SEIS specifically addresses the need to mitigate the impact of the proposed new reduced height fixed span bridge: "Environmental analyses for this Draft SEIS have been conducted to evaluate benefits and impacts to environmental and community resources (e.g., air quality, climate, land use, transportation, etc.) and *to identify potential mitigation for adverse impacts*. Agencies, tribes, advisory groups, and the public will have additional opportunities to provide input and feedback on the Modified LPA, environmental analyses, and *proposed mitigation.*" Section 2.5.4 (Description of Alternatives), page 2-77 (emphasis added).

Despite the foregoing, the SEIS is facially devoid of any detailed plan to mitigate the financial and local employment impact of the new proposed reduced height-fixed span bridge. At best, the SEIS provides that "[t]he IBR Program would continue to coordinate with the affected

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[2] Greenberry strongly disagrees that it can offset the economic impacts of the reduced height fixed span design by "securing a downriver satellite site to complete final assembly." This is contrary to what Greenberry has previously advised the IBR Program in terms of both the ability to fabricate large pieces elsewhere and with respect to the unique physical attributes of its current facility. Further, based on projections, such a "satellite site" would cost well over $100 million (and likely significantly more) in replacement and relocation costs.

vessel owners and river users to reach *mutually acceptable decisions* and agreements to *avoid impacts* through *adjustments to vessels or business operations prior to publication* of the Final SEIS." SEIS, Section 3.2 (Navigation), page 3.2-18 (emphasis added). This is patently insufficient, and it relies on the assumption that Greenberry—along with the other fabricators—will agree to whatever the IBR Program proposes to pay for the mitigation of the severe consequences the new bridge will have on Greenberry's operations. This is the textbook definition of arbitrary and capricious action, and the SEIS fails to meet the analytical requirements of an Environmental Impact Statement.

As a result of the inadequate financial analysis in the SEIS, and the failure to adequately consider the impacts (or truly consider the weight of the impacts reviewed) caused by the new proposed reduced-height fixed span bridge—including the provision of a clearly articulated plan to mitigate the harm to Greenberry caused by the proposed bridge—the IBR Program's actions, including the SEIS, are arbitrary, capricious, an abuse of discretion, or otherwise not in accordance with law because of the failure to meet the requirements of the National Environmental Policy Act, 42 U.S.C. § 4321 *et seq*.

We trust that the foregoing adequately sets forth the serious deficiencies with the SEIS that must be immediately addressed and rectified by the IBR Program. Please feel free to contact the undersigned with any questions that the IBR Program may have with respect to these comments.

Best regards,

LANE POWELL PC



Bruce H. Cahn

IBR Draft SEIS - RECORD #3955 DETAIL

First Name :	Bruce
Last Name :	Cahn
Attachments :	Vigor Industrial LLC_Original.pdf (312 kb)

LANE POWELL

BRUCE H. CAHN
[redacted]

DANIEL A. KITTLE
[redacted]

November 13, 2024

VIA REGULAR MAIL

IBR Program Draft SEIS
c/o Chris Regan
500 Broadway Street, Suite 200
Vancouver, WA 98660

Re: Comments of Vigor Industrial LLC to Interstate Bridge Replacement Program Draft Supplemental Environmental Impact Statement

Dear Mr. Regan:

We provide the following comments of Vigor Industrial LLC and its wholly owned subsidiary, Vigor Works LLC (formerly Oregon Iron Works) (together "Vigor") to the Draft Supplemental Environmental Impact Statement ("SEIS") of the Interstate Bridge Replacement Program ("IBR Program") issued on September 20, 2024. These comments are provided pursuant to 40 CFR §1503.1.

As you may be aware, Vigor is identified in the SEIS as one of "three industrial fabricators with large freight shipments [that] have vertical clearance requirements greater than the clearance provided by the Modified LPA with either fixed-span configuration." SEIS, Section 3.2 (Navigation), page 3.2-11. Section 3.1 of the SEIS specifically acknowledges that "bridge openings are needed for some government vessels, tall ships and sailboats, floating construction equipment, larger ocean-going tugs or vessels, **and specialty shipments from area fabricators** that require more than 72 feet of vertical navigation clearance." SEIS, Section 3.1 (Transportation), page 3.1-12 (emphasis added).[1]

[1] Despite this, the IBR Program further asserts in the SEIS that "Overall, the Modified LPA is expected to result in little to no indirect impact to upstream marine-dependent land uses." SEIS, Section 3.2 (Navigation), page 3.2-17. For the reasons Vigor has provided separately to the IBR Program previously, Vigor strongly disagrees with this statement and will in fact be severely impacted by the reduced height fixed span design in the Modified Locally Preferred Alternative ("Modified LPA").

These impacts are addressed elsewhere in the SEIS. Specifically, Section 3.4 (Land Use and Economics) provides:

- "Vessels or cargo shipments unable to pass beneath a fixed-span configuration could result in economic impacts including increased production costs, reduced potential for future work, and reduced employment opportunities in the region. Affected fabricators could continue to seek contracts for products that exceed the bridges' vertical clearance but would require securing a downriver satellite site to complete final assembly and could incur higher costs."[2] Section 3.4 (Land Use and Economics), page 3.4-34 (emphasis added).

- "Nevertheless, a fixed-span configuration with 116 feet of vertical clearance would permanently deny access under the bridges to mariners who require vertical clearances of greater than 116 feet for the 100+ year service life span of the bridges." Section 3.4 (Land Use and Economics), page 3.4-35 (emphasis added).

As a result of this acknowledged impact, the SEIS provides further that "[t]he Modified LPA with a fixed-span configuration would have long-term effects to marine-based operations currently operating on the Columbia River, including five vessels and three upstream fabricators when shipping large cargo requiring VNC over 116 feet. Under the double-deck and single-level fixed-span configurations, these vessels and cargo shipments would be unable to transit beneath the new Columbia River bridges in either some conditions when river levels approach or exceed ordinary high-water levels or be permanently precluded from transiting the bridge." SEIS, Section 3.2 (Navigation), page 3.2-18.

Further, the SEIS specifically addresses the need to mitigate the impact of the proposed new reduced height fixed span bridge: "Environmental analyses for this Draft SEIS have been conducted to evaluate benefits and impacts to environmental and community resources (e.g., air quality, climate, land use, transportation, etc.) and *to identify potential mitigation for adverse impacts*. Agencies, tribes, advisory groups, and the public will have additional opportunities to provide input and feedback on the Modified LPA, environmental analyses, and *proposed mitigation*." Section 2.5.4 (Description of Alternatives), page 2-77 (emphasis added).

Despite the foregoing, the SEIS is facially devoid of any detailed plan to mitigate the financial and local employment impact of the new proposed reduced height-fixed span bridge. At best,

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[2] Vigor strongly disagrees that it can offset the economic impacts of the reduced height fixed span design by "securing a downriver satellite site to complete final assembly." This is contrary to what Vigor has previously advised the IBR Program in terms of both the ability to fabricate large pieces elsewhere and with respect to the unique physical attributes of its current facility. Further, based on projections, such a "satellite site" would cost well over $100 million (and likely significantly more) in replacement and relocation costs.

the SEIS provides that "[t]he IBR Program would continue to coordinate with the affected vessel owners and river users to reach *mutually acceptable decisions* and agreements to *avoid impacts* through *adjustments to vessels or business operations prior to publication* of the Final SEIS." SEIS, Section 3.2 (Navigation), page 3.2-18 (emphasis added). This is patently insufficient, and it relies on the assumption that Vigor—along with the other fabricators—will agree to whatever the IBR Program proposes to pay for the mitigation of the severe consequences the new bridge will have on Vigor's operations. This is the textbook definition of arbitrary and capricious action, and the SEIS fails to meet the analytical requirements of an Environmental Impact Statement.

As a result of the inadequate financial analysis in the SEIS, and the failure to adequately consider the impacts (or truly consider the weight of the impacts reviewed) caused by the new proposed reduced-height fixed span bridge—including the provision of a clearly articulated plan to mitigate the harm to Vigor caused by the proposed bridge—the IBR Program's actions, including the SEIS, are arbitrary, capricious, an abuse of discretion, or otherwise not in accordance with law because of the failure to meet the requirements of the National Environmental Policy Act, 42 U.S.C. § 4321 *et seq.*

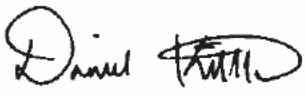
We trust that the foregoing adequately sets forth the serious deficiencies with the SEIS that must be immediately addressed and rectified by the IBR Program. Please feel free to contact the undersigned with any questions that the IBR Program may have with respect to these comments.

Sincerely,

LANE POWELL PC



Bruce H. Cahn



Daniel A. Kittle