Interstate Bridge Replacement Program

Amended Record of Decision

June 2026

OREGON

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WASHINGTON

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AMENDED RECORD OF DECISION SUMMARY

The Federal Highway Administration (FHWA) and Federal Transit Administration (FTA) are the joint federal lead agencies for the Interstate Bridge Replacement (IBR) Program and are responsible for ensuring that all environmental documents required under the federal environmental review process comply with the National Environmental Policy Act (NEPA, 42 U.S. Code §§ 4321 – 4347), FHWA and FTA environmental statute (23 U.S. Code §139) and regulation (23 Code of Federal Regulations [CFR] Part 771), and other applicable federal environmental laws and requirements. The IBR Program is proposed by the Oregon and Washington State Departments of Transportation, Southwest Washington Regional Transportation Council, Oregon Metro, Clark County Public Transportation Benefit Area (C-TRAN), and Tri-County Metropolitan Transportation District (TriMet).

This Amended Record of Decision (ROD) for the IBR Program amends the ROD for the Columbia River Crossing (CRC) project that was jointly issued by FHWA and FTA on December 7, 2011 (CRC ROD) (Appendix A). The CRC ROD followed a draft and final environmental impact statement (EIS) and included identification of the selected alternative for the CRC project (CRC Selected Alternative). Since its publication, FHWA and FTA completed two CRC NEPA re-evaluations (CRC 2012 and CRC 2013). A NEPA re-evaluation of the CRC Final EIS and CRC ROD was prepared for the IBR Program (IBR 2021a), followed by a draft and final supplemental environmental impact statement (SEIS) (IBR 2024, IBR 2026).

This Amended ROD describes the development of the Modified Locally Preferred Alternative (LPA) the different design options and components considered (defined in Section 2), including the components that remain the same as those selected in the CRC ROD, and the basis for the decision (i.e., selection of the Modified LPA with certain design options as the Amended Selected Alternative). This Amended ROD also documents the avoidance, minimization, and other mitigation measures that will be implemented to address the reasonably foreseeable effects of the Amended Selected Alternative. Although no formal comment period on the Final SEIS is required, all comments received from members of the public within 30 days of the notice of availability of the Final SEIS are catalogued in Appendix G. FHWA and FTA responded to any comments received during that time that raised new substantive issues that pertained to new information presented in the Final SEIS (i.e., information or analyses that were not previously made publicly available in the Draft SEIS), identified errors in the Final SEIS, would result in substantive changes to the Final SEIS or its underlying analyses, or would alter the final decision. Responses to those comments are provided in Appendix G.

This Amended ROD incorporates the project decisions and environmental findings and determinations found in the CRC ROD that remain valid or unchanged. This Amended ROD details new, updated, or revised findings in the IBR Program Final SEIS; and information in the CRC project Final EIS that was revised, modified, or withdrawn due to changed conditions and the associated decisions as part of this Amended ROD. It also includes a summary of reasonably foreseeable effects (Appendix C) and a list of mitigation commitments (Appendix D). Any findings from the CRC ROD not explicitly incorporated by reference or not revised in this Amended ROD are not part of the final decision for the IBR Program.

DECISION

In this Amended ROD, FHWA and FTA select the "Amended Selected Alternative" which is also referred to as the "Modified Locally Preferred Alternative (LPA) with Recommended Design Options," for the IBR Program. The basis for this decision is provided in the following sections and appendices, as well as the supporting NEPA documents, including the IBR Program Final SEIS.

The Interstate Bridge Replacement Program Amended Record of Decision is hereby approved.

YAMILEE P VOLCY
Digitally signed by YAMILEE P VOLCY
Date: 2026.07.01 10:01:08 -07'00'

Yamilee Volcy
FHWA Washington Division Acting Administrator

KEITH LYNCH
Digitally signed by KEITH LYNCH
Date: 2026.07.01 09:56:58 -07'00'

Keith Lynch
FHWA Oregon Division Administrator

SUSAN KAY FLETCHER
Digitally signed by SUSAN KAY FLETCHER
Date: 2026.07.01 09:51:20 -07'00'

Susan Fletcher
FTA Region 10 Administrator

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ACRONYMS AND ABBREVIATIONS

Acronym/Abbreviation	Definition
ABA	Architectural Barriers Act
ADA	Americans with Disabilities Act
BGEPA	Bald and Golden Eagle Protection Act
BO	Biological Opinion
CEQ	Council on Environmental Quality
CFR	Code of Federal Regulations
C-TRAN	Clark County Public Transportation Benefit Area
CRC	Columbia River Crossing
CWA	Clean Water Act
DAHP	Washington State Department of Archaeology and Historic Preservation
DEIS	Draft Environmental Impact Statement
Draft SEIS	IBR Program Draft Supplemental Environmental Impact Statement and Section 4(f) Evaluation
EFH	essential fish habitat
EIS	Environmental Impact Statement
Environmental Review Documents	Collectively, the IBR Program NEPA Re-Evaluation (December 29, 2021), IBR Program Draft SEIS (September 20, 2024), IBR Program Final SEIS (April 17, 2026), and the determinations and evaluations made therein, in addition to the CRC project Draft EIS (May 2, 2008), CRC project Final EIS (September 23, 2011), CRC ROD (2011), and two CRC project NEPA re-evaluations (2012, 2013)
EPA	U.S. Environmental Protection Agency
ESA	Endangered Species Act; *also* Environmental Site Assessment
FAA	Federal Aviation Administration
FEIS	Final Environmental Impact Statement
FHWA	Federal Highway Administration
Final SEIS	IBR Program Final Supplemental Environmental Impact Statement and Section 4(f) Evaluation

Acronym/Abbreviation	Definition
FLP	Federal Lands to Parks
FRA	Federal Railroad Administration
FTA	Federal Transit Administration
HNC	horizontal navigation clearance
I-5	Interstate 5
IAMR	Interstate Access Modification Request
IBR	Interstate Bridge Replacement
IFR	Interim Final Rule
LOA	letter of authorization
LOC	letter of concurrence
LOS	level of service
LPA	Locally Preferred Alternative
LRT	light-rail transit
LRV	light-rail vehicle
LWCF	Land and Water Conservation Fund
MAX	Metropolitan Area Express
MBTA	Migratory Bird Treaty Act
Metro	Oregon Metro
MMPA	Marine Mammal Protection Act
MOA	memorandum of agreement
MSAT	mobile source air toxic
MSFCMA	Magnuson-Stevens Fisheries Conservation Management Act
MTIP	Metropolitan Transportation Improvement Program
NAAQS	National Ambient Air Quality Standards
NEPA	National Environmental Policy Act
NHPA	National Historic Preservation Act

Acronym/Abbreviation	Definition
NMFS	National Marine Fisheries Service
NPDES	National Pollutant Discharge Elimination System
NRHP	National Register of Historic Places
ODOT	Oregon Department of Transportation
OMF	Operations and Maintenance Facility
PA	Programmatic Agreement
$PM_{2.5}$	particulate matter less than or equal to 2.5 microns in diameter
PNCD	Preliminary Navigation Clearance Determination
RCRA	Resource Conservation and Recovery Act
ROD	Record of Decision
RTC	Southwest Washington Regional Transportation Council
RTP	Regional Transportation Plan
SEIS	Supplemental Environmental Impact Statement
SHPO	State Historic Preservation Office
SR	State Route
SSA	Sole Source Aquifer
TPSS	traction power substation
TriMet	Tri-County Metropolitan Transportation District
USACE	U.S. Army Corps of Engineers
USDA	U.S. Department of Agriculture
U.S.C.	United States Code
USCG	U.S. Coast Guard
USDA	U.S. Department of Agriculture
USFWS	U.S. Fish and Wildlife Service
VNC	vertical navigation clearance
WOTUS	waters of the United States

Acronym/Abbreviation	Definition
WSDOT	Washington State Department of Transportation

1. INTRODUCTION

The Interstate Bridge Replacement (IBR) Program is a continuation of the previously suspended Columbia River Crossing (CRC) project and maintains the same purpose of replacing the aging Interstate Bridge with a modern, seismically resilient multimodal structure. The IBR Program improvements are located along a 5-mile stretch of the Interstate 5 (I-5) corridor that extends from approximately Victory Boulevard in Portland, Oregon, to State Route (SR) 500 in Vancouver, Washington.

The IBR Program is proposed by the Oregon and Washington State Departments of Transportation (ODOT and WSDOT), Southwest Washington Regional Transportation Council (RTC), Oregon Metro (Metro), Clark County Public Transportation Benefit Area (C-TRAN), and Tri-County Metropolitan Transportation District (TriMet). The Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA) are the joint federal lead agencies for the IBR Program and are responsible for preparing the environmental documentation and ensuring compliance with the National Environmental Policy Act (NEPA, 42 U.S. Code §§ 4321 – 4347).

The CRC project's NEPA process concluded with a Record of Decision (ROD) published in 2011 (herein, the CRC ROD). Subsequent NEPA re-evaluations were prepared in 2012 and 2013 (CRC 2012, CRC 2013). The CRC project was suspended in 2014 because it did not secure adequate state funding to advance to construction. In 2019, a bi-state legislative committee requested that ODOT and WSDOT restart the CRC project, renaming it the IBR Program. Because the CRC ROD remained in effect when the IBR Program restarted, the CRC Selected Alternative was identified as the starting point for the IBR Program. The IBR Program team evaluated whether past design assumptions still addressed today's changed conditions, including physical environment, community priorities, and regulations, or whether updates were needed. In 2021, FHWA and FTA issued a NEPA re-evaluation that assessed the extent of changes in conditions and determined a supplemental environmental impact statement (SEIS) should be prepared to identify and disclose new reasonably foreseeable effects and mitigation associated with changes in conditions affecting the CRC Selected Alternative that occurred since 2013 (IBR 2021a). FHWA and FTA published a notice to prepare an SEIS for the IBR Program in the Federal Register (Volume 88, Number 65) on April 5, 2023.

The Draft SEIS and Section 4(f) Evaluation (herein, the Draft SEIS) was published on September 20, 2024, for a 60-day public comment period. It evaluated a No-Build Alternative—serving as a baseline for assessing environmental impacts and a no-action option for decision-makers—and one Build Alternative, the Modified Locally Preferred Alternative (LPA), which consisted of the CRC Selected Alternative with modifications necessitated by changed conditions. The Draft SEIS also evaluated design options associated with the Modified LPA (described in Draft SEIS Section 2.2). Details on the alternatives and design options evaluated in the Draft and Final SEIS are provided in Section 4.

More than 3,600 public comment submissions that included over 9,000 individual comments[1] were received and were responded to in the Final SEIS and Section 4(f) Evaluation (herein, the Final SEIS), which was published on April 17, 2026. The Final SEIS identified the Recommended Design Options for the Modified LPA.

This Amended ROD is the final federal agency action that identifies the selected alternative and states the reasons for choosing that alternative. The "Amended Selected Alternative" refers to the IBR Program "Modified LPA with Recommended Design Options" evaluated in the Final SEIS. The Amended Selected Alternative is summarized in this Amended ROD.

[1] A "submission" is an entire email, web comment form submission, voicemail, oral testimony, or letter of submittal in its entirety provided as a public comment during the public comment period. A "comment" is a specific piece of feedback within a submission sorted by a Draft SEIS topic. A single submission may include multiple comments, each addressing an individual Draft SEIS topic.

The Amended ROD amends the CRC ROD, which is included as Appendix A. The Amended ROD incorporates the project decisions and environmental findings and determinations found in the CRC ROD that remain valid or unchanged. This Amended ROD details new, updated, or revised findings in the IBR Program Final SEIS; and information in the CRC project Final EIS that was revised, modified, or withdrawn due to changed conditions and the associated decisions as part of the Amended ROD. Any findings from the CRC ROD not explicitly incorporated by reference or not revised in this Amended ROD are not part of the final decision for the IBR Program.

2. AMENDED SELECTED ALTERNATIVE

2.1 Components of the Amended Selected Alternative

FHWA and FTA select the alternative referred to as the "Modified LPA with Recommended Design Options" in the Final SEIS as the Amended Selected Alternative. The main components of the Amended Selected Alternative are described as follows:

- A new pair of Columbia River bridges—one for northbound and one for southbound travel—built west of the existing bridge. The two new single-level fixed-span bridges will each provide 116 feet of vertical navigation clearance (VNC) over the primary navigation channel and will each include three through lanes, safety shoulders, and one auxiliary lane in each direction. When all highway, transit, and active transportation is moved to the new Columbia River bridges, both spans of the existing Interstate Bridge will be demolished. The centerline of the primary navigation channel will be relocated approximately 500 feet south of its existing location near the Vancouver shoreline and widened from 263 feet to 400 feet.
- A 1.9-mile light-rail transit (LRT) extension of the current Metropolitan Area Express (MAX) Yellow Line from the Expo Center MAX Station in North Portland, where it currently ends, to a terminus near Evergreen Boulevard in Vancouver. The LRT extension will include new stations at Hayden Island, in downtown Vancouver (Waterfront Station), and near Evergreen Boulevard (Evergreen Station), as well as reconstruction of the existing Expo Center MAX Station and acquisition of 19 new light-rail vehicles (LRV). TriMet, which operates the MAX system, will also operate the Yellow Line extension.
- Associated LRT infrastructure such as traction power substations (TPSSs),[2] an overhead catenary system, signal and communications support facilities, an overnight light-rail vehicle (LRV) facility at the Expo Center, and an expanded maintenance facility at TriMet's existing Ruby Junction Light-Rail Operations and Maintenance Facility (OMF).
- Parking capacity to accommodate 1,270 vehicles at designated park and rides near the Waterfront Station and Evergreen Station to serve LRT riders.
- Connections to local bus service, including bus rapid transit and express bus routes, in collaboration with C-TRAN, in addition to the proposed new LRT service.
- Shoulders on I-5 from Interstate Avenue/Victory Boulevard to SR 500/39th Street to accommodate express bus-on-shoulder service in each direction.
- Associated bus service improvements, including acquisition of new buses and construction of facility improvements to add three bus bays for the new buses at the existing C-TRAN OMF.
- One auxiliary lane in each direction across the Columbia River bridges between the Marine Drive interchange and the Mill Plain Boulevard interchange. Auxiliary lanes are ramp-to-ramp connections on the highway that improve interchange safety by providing drivers more space and time to merge, diverge, and weave at highway access points.
- Modifications to seven I-5 interchanges and the I-5 mainline between Interstate Avenue/Victory Boulevard in Portland and SR 500/39th Street in Vancouver. The alignment of the I-5 mainline will remain in its current location in downtown Vancouver between the SR 14 interchange and Mill Plain Boulevard interchange.

[2] Each TPSS will be approximately 75 by 50 feet, including parking and access areas.

- Reconfiguration of some adjacent local streets to complement the new interchange designs and improve local east–west connections.
- Reconfiguration of the existing C Street off-ramp from northbound I-5 and replacement of the existing on-ramp from Washington Street/5th Street with a new C Street on-ramp to southbound I-5 in downtown Vancouver.
- Six new adjacent bridges across North Portland Harbor: one on the east side of the existing I-5 North Portland Harbor bridge and five on the west side or overlapping with the existing bridge (which will be removed). The bridges will carry (from west to east) LRT tracks, the southbound I-5 off-ramp to Marine Drive, southbound I-5 mainline, northbound I-5 mainline, northbound I-5 on-ramp from Marine Drive, and an arterial bridge for local traffic to Hayden Island with a shared-use path for pedestrians and bicyclists.
- A system of shared-use paths, bicycle lanes, sidewalks, enhanced wayfinding, and facility modifications to comply with the Americans with Disabilities Act (ADA) for people who walk, bike, and roll throughout the construction footprint.[3] In this document, these components are referred to collectively as "active transportation improvements."
- Variable-rate tolling, including signage and equipment, for motorists using the river crossing, to serve as a demand-management and financing tool.

See Appendix B for maps of the Amended Selected Alternative. A detailed description of the Amended Selected Alternative (referred to in the Final SEIS as the Modified LPA with Recommended Design Options) is presented in Chapter 2 of the Final SEIS.

2.2 Amended Selected Alternative Construction

As described in Section 2.3 of the Final SEIS, construction of the Amended Selected Alternative will be sequenced and could last more than 10 years to complete all Program components. Specific construction packages will be sequenced based on a variety of factors, including the scale of improvements, different types of infrastructure and associated construction specialties required, timing of funding received, maintenance of traffic on I-5, navigation on the Columbia River, seasonal and weather constraints, or permit conditions. As construction progresses, interim connections may be in place while subsequent components are built and final connections and finishes are completed.

2.2.1 First Construction Phase

The first construction package is anticipated to be for the new Columbia River bridges, with demolition of the existing Interstate Bridge occurring after the new Columbia River bridges are open to traffic. During construction of the first package, the connection to and from I-5 via the C Street ramps may be temporarily disconnected but will be reconnected as part of subsequent phases of construction(see Section 2.3.1 of the Final SEIS).

During the period between the publication of the Final SEIS and this Amended ROD, bridge permitting discussions identified that the temporary vertical navigation clearance for the primary (north) navigation channel will be reduced to 100 feet above zero Columbia River Datum (CRD) for approximately 3 years during construction of the Columbia River bridges. Vertical navigation clearances of the barge (center) and alternate

[3] The construction footprint runs along a 5-mile segment of I-5, approximately between the SR 500 interchange in Washington and the I-5/Columbia Boulevard interchange in Oregon, as well as the construction footprint for the expansion of the TriMet-owned Ruby Junction Light-Rail OMF in Gresham, Oregon. See the introduction to Chapter 3 of the Final SEIS for details.

barge (south) navigation channels will be reduced to 46 feet and 72 feet CRD, respectively, for several years; these reductions will be staggered with some overlap throughout construction. Each of the three navigation channels will be closed for approximately 10 to 24 months during construction of the new bridges and closed a second time for up to 6 months while the existing Interstate Bridge is being removed. Closures of navigation channels will be staggered so that at least one channel remains open at all times. FHWA and FTA anticipate 6 to 16 known river users may be temporarily impacted from the reduced vertical navigation clearance of the primary navigation channel depending on weather conditions and water elevation of the Columbia River. Although navigation impacts during construction were disclosed in Section 3.2, Navigation, of the Final SEIS, the duration and the possibility that certain river users may be restricted or unable to navigate up or downstream of the Columbia River bridges during that time is new information. FHWA and FTA evaluated this new information to determine if it would result in new significant impacts that were not disclosed in the Final SEIS.FHWA and FTA determined the new information would not result in new significant impacts, the Final SEIS remained valid, and no supplemental environmental study was necessary. These potential impacts may be lessened or avoided during the post-NEPA design process and any affected river users will be informed of possible impacts. The public, including affected river users, will have an opportunity to comment during the U.S. Coast Guard general bridge permit process.

2.2.2 Future Construction Phases

Construction of other components of the Amended Selected Alternative will be sequenced during and after the construction of the new Columbia River bridges begins. As design progresses, an Interstate Access Modification Request (IAMR)[4] will be completed to evaluate interstate interchange performance for each phase of the IBR Program.

[4] The IAMR will be prepared in compliance with FHWA procedures for approving changes to interstate access and operations (23 CFR Part 624). Preserving and enhancing safety and operations on the interstate system are central policy considerations in FHWA's access modification approval procedures. Following the conclusion of the NEPA process, the IBR Program is required to provide FHWA with technical documentation justifying the proposed changes, and FHWA approval of the IAMR is required before construction can begin.

3. PURPOSE AND NEED

The Purpose and Need statement for the IBR Program was originally developed during the CRC project. The IBR Program is a continuation of the previously suspended CRC project and maintains the same Purpose and Need because the underlying problems the CRC project sought to address remain unresolved. The text of the original Purpose and Need (provided in Chapter 1 of the IBR Program Final SEIS) has been edited to update references to the CRC project with the IBR Program and to reflect current terminology. More recent data and supplemental information regarding the Purpose and Need were provided in sidebars and footnotes in the Final SEIS.

The purpose of the proposed action is to improve I-5 corridor mobility by addressing present and future travel demand and mobility needs in the IBR Program area. The Program area extends from approximately Columbia Boulevard in the south to SR 500 in the north. Relative to the No-Build Alternative, the proposed action is intended to achieve the following objectives: (a) improve travel safety and traffic operations on the I-5 river crossing and associated interchanges; (b) improve connectivity, reliability, travel times, and operations of public transportation modal alternatives in the Program area; (c) improve highway freight mobility and address interstate travel and commerce needs in the Program area; and (d) improve the I-5 bridge river crossing's structural integrity (seismic stability).

The specific needs to be addressed by the IBR Program are listed below and detailed in Chapter 1 of the Final SEIS.

- 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

4. ALTERNATIVES AND DESIGN OPTIONS CONSIDERED

Substantial technical analyses were completed to support the development of the CRC project, including an alternatives screening process under NEPA. As part of the development of alternatives for the CRC project, multiple river crossing and transit components were screened against the Purpose and Need. Components that met the Purpose and Need became part of the build alternatives that were evaluated in the CRC project EIS.

NEPA compliance for the CRC project was completed with publication of the signed CRC ROD, which included identification of the CRC Selected Alternative. Two subsequent NEPA re-evaluations (2012 and 2013) addressed revisions to the CRC Selected Alternative. Together, the CRC Selected Alternative with the revisions analyzed in the re-evaluations is referred to in the Final SEIS and this document as the "CRC Selected Alternative." This ROD amends the CRC ROD. **The updated version of the CRC Selected Alternative is referred to as the "Modified LPA" in the IBR Program Draft and Final SEIS**.

4.1 Alternatives Dismissed from Further Study

During the initial screening effort for the CRC project's NEPA alternatives analysis, the CRC team conducted a two-step screening process that narrowed the number of alternatives to be evaluated in the CRC Draft EIS. The CRC team evaluated 23 river crossing and 14 transit components using a pass/fail test designed to eliminate components beyond the scope of the project or ideas that could not address the project's Purpose and Need. Additional information on the CRC project screening of river crossing and transit components is available in documents prepared for the CRC project, at https://wsdot.wa.gov/accountability/ssb5806/alternative-development.htm.

While most aspects of the main components have not changed since selection of the CRC Selected Alternative, some details were revised due to changed conditions, as described in Section 2.5 of the Final SEIS. In addition, early public input on the IBR Program identified changes to four of the previously screened and dismissed river crossing and transit components. These four components were rescreened to determine whether the component changes would now meet the Purpose and Need; the IBR Program team confirmed these components still did not meet the Purpose and Need.[5] Otherwise, the sections of the CRC ROD identifying the alternatives considered but dismissed and the other components considered but dismissed remain valid or unchanged as appropriate (see Appendix A).

4.2 Alternatives Evaluated in the SEIS

As described in the CRC ROD (Appendix A), a wide range of transportation alternatives were considered during screening and subsequent evaluation for the CRC project.

As described in Chapter 2 of the Final SEIS, the CRC Selected Alternative was identified as the starting point for the IBR Program and two alternatives were evaluated in the Draft and Final SEIS: 1) the Modified LPA with several different design options (described in the following section of this Amended ROD and detailed in Section 2.2 of the Final SEIS), and 2) the No-Build Alternative, which serves as a baseline for evaluating

[5] The four previously screened river crossing and transit components were a new tunnel technology (immersed tube) (IBR 2021b), an amended "common sense alternative" (IBR 2021c), a "third/supplemental bridge" (IBR 2021d) and high-speed rail on a new bridge about 1 mile west of I-5, parallel to the BNSF Railway bridge (IBR 2021e). See Chapter 2 of the Final SEIS for details.

reasonably foreseeable environmental effects and a no-action option for decision-makers (described in Section 2.4 of the Final SEIS).

The five main components of the CRC Selected Alternative were: a pair of replacement bridges across the Columbia River, extension of light-rail transit into Vancouver, modifications to seven interchanges, active transportation improvements, and variable-rate tolling. The IBR Program team evaluated whether previous CRC design assumptions address today's changed conditions, including the physical environment, community priorities, and governmental regulations.

In concept, most aspects of the five main components remain largely unchanged since the CRC ROD, but some details were revised due to changed conditions, as reflected in the Final SEIS. Table 1 lists the main components of both the CRC Selected Alternative and the Modified LPA and indicates how, if applicable, the component details changed between the CRC Selected Alternative and the Modified LPA. Section 2.5.2 and Table 2-6 in Chapter 2 of the Final SEIS detailed the changed conditions that have occurred since 2013 and why those changed conditions resulted in the modifications to the CRC Selected Alternative shown in Table 1.

In this Amended ROD, the selection of design options is detailed in Section 5.1 and the basis of decision for the Amended Selected Alternative is detailed in Section 5.2.

Table 1. Components of the CRC Selected Alternative and Modified LPA

CRC Selected Alternative Components	IBR Program Modified LPA Components	Changed	Unchanged
Columbia River Bridges			
• **Pair of replacement bridges across the Columbia River with at least 116 feet VNC**			
– Double-deck fixed-span bridge on a curved alignment	– Single-level fixed-span bridge on a straight alignment	X	
I-5 Highway			
• **Modifications to seven interchanges (from south to north)**			
– Victory Boulevard: On-ramp to northbound I-5 and southbound off-ramp from I-5 would merge and diverge directly	– Victory Boulevard: On-ramp to northbound I-5 and southbound off-ramp from I-5 will merge and diverge directly		X
– Marine Drive: single-point interchange with flyover ramp and southbound braided on-ramp with Victory Boulevard Southbound off-ramp	– Marine Drive: Single-point interchange without flyover ramp (changed) and with southbound braided on-ramp with Victory Boulevard Southbound off-ramp (unchanged)	X	X
– Hayden Island: Full Interchange	– Hayden Island: Partial Interchange	X	
– SR 14: Direct connections between I-5 and SR 14 would be rebuilt	– SR 14: Direct connections between I-5 and SR 14 will be rebuilt		X
– City Center: Partial interchange ramps to and from the south	– City Center: Partial interchange ramps to and from the south		X
– Mill Plain Boulevard: Tight-diamond interchange	– Mill Plain Boulevard: Tight-diamond interchange		X
– Fourth Plain Boulevard: Modifications to better accommodate freight mobility with braided southbound off-ramp with SR 500	– Fourth Plain Boulevard: Modifications to better accommodate freight mobility with braided southbound off-ramp with SR 500		X
– SR 500: Partial interchange to and from the south to I-5, ramps to and from the north to I-5	– SR 500: Partial interchange to and from the south to I-5 (unchanged); no ramps to and from the north to I-5 (changed)	X	X
• Two auxiliary lanes on I-5 added between Interstate Avenue/ Victory Boulevard and SR 500	• One auxiliary lane on I-5 between Marine Drive and SR 500	X	
• Related enhancements to the local street network	• Related enhancements to the local street network		X

CRC Selected Alternative Components	IBR Program Modified LPA Components	Changed	Unchanged
North Portland Harbor Bridge			
• From west to east: – One new multimodal bridge for LRT, local traffic, and bike lanes – One new bridge for the southbound I-5 off-ramp to Marine Drive – One new bridge for the southbound I-5 on-ramp from Hayden Island – Modifications to stabilize the existing I-5 mainline bridge – One new bridge for the I-5 northbound on-ramp from Marine Drive with a multiuse path on the lower level	• From west to east: – One new bridge for LRT tracks – One new bridge for the southbound I-5 off-ramp to Marine Drive – One new bridge for the southbound I-5 mainline – One new bridge for the northbound I-5 mainline – One new bridge for the northbound I-5 on-ramp from Marine Drive – One new arterial bridge for local traffic between the Portland mainland and Hayden Island; this bridge will also include a standard use path (SUP) for pedestrians and bicyclists	X	
Active Transportation			
• Active transportation improvements throughout the corridor, including an SUP connecting to the existing active transportation system, and the Community Connector over I-5, just south of Evergreen Boulevard	• Active transportation improvements throughout the corridor, including an SUP connecting to the existing active transportation system and the Community Connector over I-5, just south of Evergreen Boulevard		X
• Portland – SUP would connect Delta Park to N Vancouver Way and extend east under the I-5 bridges to N Marine Drive, and would also make a connection under the ramp bridge to Hayden Island	• Portland – SUP located adjacent to I-5 mainline and will connect Delta Park to N Marine Drive (unchanged) – Active transportation improvements extended to additional streets (changed) – Addition of SUPs on Expo Center Road and Victory Boulevard (changed)	X	X
• Hayden Island – SUP would hang below the proposed northbound on-ramp bridge over North Portland Harbor and connect to the island	• Hayden Island – SUP aligns with the new North Portland Harbor arterial bridge and lands north of the Marine Drive interchange	X	
• Over the Columbia River – SUP would be located under the northbound bridge highway deck	• Over the Columbia River – SUP is located on the northbound bridge adjacent to vehicle lanes	X	

CRC Selected Alternative Components	IBR Program Modified LPA Components	Changed	Unchanged
• Vancouver – SUP would pass under the I-5 bridges and then would land at-grade at the waterfront	• Vancouver – SUP will be above the ground, but located under replacement bridge approaches, then go over the BNSF Railway and under the new elevated LRT Waterfront Station – SUP will connect E McLoughlin Boulevard to E Fourth Plain Boulevard adjacent to the highway ramp	X	
Transit • **Extension of LRT from the Expo Center MAX Station in Portland to Vancouver and associated transit infrastructure**			
– LRT stations: ▪ One new LRT station on Hayden Island	– LRT stations: ▪ One new LRT station on Hayden Island		X
▪ Five new LRT stations in downtown Vancouver (on the Broadway-Washington couplet) • One LRT station on Washington Street between 5th and 6th streets, • A pair of LRT stations between 9th Street and Evergreen Boulevard • A pair of LRT stations between 15th and 16th Streets	▪ Two new LRT stations in downtown Vancouver (adjacent to I-5) • One LRT station near the waterfront • One terminus station near Evergreen Boulevard	X	
▪ New LRT terminus station near Clark College	▪ Terminus station near Evergreen Boulevard	X	
▪ Keep existing station at Expo Center in Portland	▪ Existing station at Expo Center in Portland will be reconstructed	X	
– At-grade LRT tracks in Downtown Vancouver	– Elevated LRT tracks adjacent to I-5 in Downtown Vancouver	X	
– Park and rides: 2,900 parking spaces at three sites—Columbia with 570 spaces (near the SR 14 interchange), Mill Plain Boulevard with 420 spaces (in uptown Vancouver), and Clark with 1,910 spaces (on McLoughlin Boulevard near Clark College)	– Park and rides: 1,270 parking spaces dispersed among five sites including three sites at Waterfront Station (Columbia Way, Columbia Street/SR 14, Columbia Street/Phil Arnold Way) and two at Evergreen Station (Library Square, Columbia Credit Union)	X	
– Acquisition of 19 light-rail vehicles	– Acquisition of 19 light-rail vehicles		X

CRC Selected Alternative Components	IBR Program Modified LPA Components	Changed	Unchanged
– Expansion of the Ruby Junction LRT maintenance facility	– Expansion of the Ruby Junction LRT maintenance facility (unchanged) – A new LRT overnight facility near Expo Center (changed)	X	X
• Local bus service – Four lines providing service between Clark County and Delta Park truncated in downtown Vancouver instead of crossing the Columbia River.	• Local bus service – TriMet Line 6 will terminate at the Expo Center MAX Station	X	
• Express bus service – Express bus route 105 from Salmon Creek Park-and-Ride truncated in downtown Vancouver	• Express bus service – Express bus route changes, including added frequency, service to downtown Portland and bus on the I-5 shoulders – Acquisition of eight double-decker or articulated buses – Additional bus bays for new double-decker buses at the C-TRAN operations and maintenance facility	X	
• Retrofits to the existing rails and electrical system on the Steel Bridge in Portland to allow trains to travel at a higher speed	• Overtaken by events (this element was completed in August 2020 by TriMet as part of its capital improvements program; this action was separate from the IBR Program)	X	
Transportation Demand and System Management Measures			
• Transportation demand and system management measures	• Transportation demand and system management measures		X
• Variable-rate tolling for motorists using the river crossing as a demand-management and financing tool	• Variable-rate tolling for motorists using the river crossing as a demand-management and financing tool		X
• Other TDM and TSM measures, including variable message signage, traveling information systems, ramp metering, signal prioritization, and other traffic management tools	• Other TDM and TSM measures, including variable message signage, traveling information systems, ramp metering, signal prioritization, and other traffic management tools		X

Notes: All dimensions and quantities are approximate.
Components indicated as both changed and unchanged include identification in the text as to which elements or design options changed or not.
CRC = Columbia River Crossing; C-TRAN = Clark County Public Transit Benefit Area Authority; I-5 = Interstate 5; IBR = Interstate Bridge Replacement; LPA = Locally Preferred Alternative; LRT = light-rail transit; MAX = Metropolitan Area Express; SR = State Route; SUP = shared-use path; TDM = transportation demand management; TSM = transportation system management; VNC = vertical navigation clearance

4.3 Design Options Evaluated in the SEIS

For the Modified LPA, the Draft and Final SEIS evaluated five sets of design options: (1) the number of auxiliary lanes, (2) the Columbia River bridge configuration, (3) the presence of ramps at C Street, (4) the I-5 alignment in downtown Vancouver, and (5) the park and rides. These design options were identified because existing environmental conditions changed since the issuance of the CRC ROD; these changes included physical changes in the environment within the Program area, regulatory changes, and changes in community priorities and interests. These changed conditions necessitated design modifications, which resulted in the IBR Program advancing the Modified LPA (with five sets of design options) for further analysis and public input to help inform the decision-making process. A detailed description of the design options and their development can be found in Section 2.5.3, IBR Program Design Option Development and Screening, in Chapter 2 of the Final SEIS. Details on their reasonably foreseeable effects can be found in Chapters 3 and 4 of the Final SEIS.

The design options considered in the Draft and Final SEIS are listed in Table 2, which also includes an explanation in italics as to why design options were needed.

Table 2. Modified LPA Components and Design Options Studied in the Draft and Final SEIS

Modified LPA Component	Design Options
Auxiliary Lanes *The CRC Selected Alternative included two auxiliary lanes.* *The one auxiliary lane design option was developed to evaluate the reasonably foreseeable effects of a smaller footprint on the environment while balancing the regional transportation needs and priorities, including safe, efficient, and reliable travel using a multimodal transportation solution for cross-river trips.*	• One auxiliary lane in each direction on the new Columbia River bridges and nearby sections of I-5 • Two auxiliary lanes in each direction of I-5 would extend across the Columbia River bridges, in addition to, and in combination with, existing auxiliary lanes from approximately Interstate Avenue/Victory Boulevard to SR 500/39th Street
Bridge Configuration *The CRC Selected Alterative included a double-deck fixed-span bridge configuration.* *The single-level fixed-span configuration was developed for the Modified LPA in response to physical and contextual changes (i.e., design and operational considerations) that necessitated examination of LRT ingress and egress from the lower level of the double-deck fixed-span configuration on the north end of the southbound bridge.* *The single-level movable-span configuration was developed to provide up to 178 feet VNC as recommended by the USCG in the 2022 Preliminary Navigation Clearance Determination.*	• Double-deck fixed-span bridge configuration • Single-level fixed-span bridge configuration • Single-level movable-span bridge configuration

Modified LPA Component	Design Options
C Street Ramps *The CRC Selected Alterative included C Street ramps in Downtown Vancouver that would have provided I-5 access to and from the south at C Street rather than the current access from Washington Street.* *Design options were included in the Modified LPA in response to federal and state coordination that required analysis of options to reduce or shift the footprint and associated reasonably foreseeable effects to cultural resources in Vancouver.*	• With C Street ramps • Without C Street ramps
I-5 Alignment in Downtown Vancouver *The CRC Selected Alterative would have maintained the I-5 mainline at its current location.* *Design options were included in the Modified LPA in response to federal and state coordination that required analysis of options to reduce or shift the footprint and associated reasonably foreseeable effects to historic properties in Vancouver.*	• Centered I-5 alignment • Westward shift of I-5 alignment
Park and Rides *The CRC Selected Alterative included three park and rides: Columbia (near the SR 14 interchange), Mill Plain (in uptown Vancouver), and Clark (on McLoughlin Boulevard near Clark College).* *The park-and-ride options changed from the CRC Selected Alternative due to the new end point (terminus) for the LRT in Vancouver, and new development in downtown Vancouver.*	• Provide parking capacity to accommodate 1,270 vehicles distributed across two park and rides: one park and ride with 570 parking spaces near the Waterfront Station and another park and ride with 700 parking spaces near the Evergreen Station. • Provide parking capacity to accommodate 1,270 vehicles dispersed among five park and ride locations: three near Waterfront Station, and two near Evergreen Station. [a]

Notes:

a Depending on final design considerations, the decision may be made to use fewer than the five sites. The SEIS analysis assumed use of all five sites as it encompasses all physical impacts.

Section 5 provides more information regarding the design options above and identifies the basis for selecting certain design options over others for inclusion within the Amended Selected Alternative. A detailed analysis of the design options is provided in Chapter 3, Existing Conditions and Environmental Consequences, and Appendix K, IBR Program Recommended Design Options Report, of the Final SEIS.

5. BASIS FOR DECISION

The basis of decision in the CRC ROD for selection of the CRC Selected Alternative over other alternatives considered in the CRC project EIS remains valid in this Amended ROD. The IBR Program updates the CRC ROD basis of decision with the following information specifically related to the selection of design options within the Amended Selected Alternative through this Amended ROD. These updates reflect the analyses in the Draft and Final SEIS. The full analysis of the reasonably foreseeable effects and benefits is provided in Chapter 3 of the Final SEIS.

Section 5.1 summarizes the noteworthy advantages and disadvantages of the design options selected for the Amended Selected Alternative compared to other design options that were evaluated in the Draft and Final SEIS. Due to the different types of design options, the categories of noteworthy advantages and disadvantages differ but represent meaningful considerations unique to each design option. While all options considered would have provided important transportation benefits and met the Purpose and Need of the IBR Program, the design options captured in the Amended Selected Alternative will either better meet certain transportation needs or will have greater environmental benefits or fewer reasonably foreseeable negative effects when compared to the No-Build.

Section 5.2 summarizes the justifications for choosing the Amended Selected Alternative relative to the No-Build Alternative evaluated in the Draft and Final SEIS and the extent to which it satisfies IBR Program's Purpose and Need.

5.1 Selection of Design Options

The following sections summarize the advantages and disadvantages of the selected design options relative to the other design options evaluated in the Draft and Final SEIS, and provide the basis for selecting the particular design option included in the Amended Selected Alternative. A detailed analysis of the design options is provided in Chapter 3, Existing Conditions and Environmental Consequences, Chapter 4, Section 4(f) Evaluation, and Appendix K, IBR Program Recommended Design Options Report, of the Final SEIS.

5.1.1 Auxiliary Lanes

Auxiliary lanes are ramp-to-ramp connections on the highway that improve interchange safety by providing drivers with more space and time to merge, diverge, and weave at highway access points. As summarized in Section 4.3 and detailed in Chapter 2 of the Final SEIS, two design options for auxiliary lanes were considered. This section summarizes the reasons why the **one auxiliary lane design option is included in the Amended Selected Alternative** rather than the two auxiliary lane design option. A summary of reasonably foreseeable effects and benefits is provided in Section 2.1 of Appendix K of the Final SEIS.

The Amended Selected Alternative and the non-selected two auxiliary lane design option will similarly outperform the No-Build Alternative in terms of traffic operations, including congestion, travel time, and traffic safety. Compared to the No-Build Alternative, the Amended Selected Alternative will decrease southbound congestion by 70% (to 4.75 hours/day) and northbound congestion by 36% (to 9 hours/day). The two auxiliary lane design option would have decreased southbound congestion by 72% (to 4.5 hours/day) and northbound congestion by 57% (to 6 hours/day). With the Amended Selected Alternative, travel times will be reduced by 7% (to 54 minutes) in the AM weekday peak period (southbound) and 38% (to 26 minutes) in the PM weekday peak period (northbound) compared to the No-Build Alternative. With the two auxiliary lane design option, travel times would have reduced by 14% (to 50 minutes) in the AM weekday peak period (southbound) and 67% (to 14 minutes) in the PM weekday peak period (northbound) compared to the No-

Build Alternative. Although the two auxiliary lane design option would have provided greater improvements to traffic operations (e.g., fewer hours of congestion per day, lower travel times for vehicles and buses) than the selected one auxiliary lane design option, the one auxiliary lane design option has the following advantages over the two auxiliary lane design option:

- **Transportation Mode and Trip Choice** – The one auxiliary lane design option aligns more closely with local planning goals and policies aimed at transitioning priorities from vehicular traffic to multimodal transportation.[6] In combination with transit and active transportation improvements and variable rate tolling, the one auxiliary lane design option will increase the likelihood that cross-river travelers will consider options to avoid peak period travel by single occupant automobile, such as other transportation modes or times of travel. See Section 3.1, Transportation, of the Final SEIS for details.
- **Footprint-Based Reasonably Foreseeable Environmental Effects** – The scale of physical impacts (footprint, or the limits of permanent improvements) of the one auxiliary lane design option will be similar to the physical impacts of the two auxiliary lane option. However, the one auxiliary lane design option will have a slightly narrower construction footprint over the Columbia River and in downtown Vancouver (see Figure 2-5 in Chapter 2 of the Final SEIS), thereby slightly reducing some footprint-based reasonably foreseeable environmental effects. The narrower construction footprint will reduce the amount of impervious area and stormwater treatment needs (see Section 3.14 and Section 3.16 of the Final SEIS) compared to the two auxiliary lane design option.
- **Cost** –The Amended Selected Alternative with the one auxiliary lane design option will cost less than the option with the two auxiliary lanes. Compared to the one auxiliary lane design option, incorporating the two auxiliary lane design option into the Amended Selected Alternative would increase the total cost by at least $500 million.[7] This is due to the addition of a second 4-mile auxiliary lane in each direction on I-5 as well as the need to widen the decks of the North Portland Harbor and Columbia River bridges.

In addition, the reasonably foreseeable effects of the Amended Selected Alternative will have minor or no differences from the reasonably foreseeable effects of the two auxiliary lane design option with regard to: navigation, property acquisitions; economics; neighborhoods; public services; utilities; parks and recreation; cultural resources; visual quality; noise; air quality; energy consumption; wetlands; terrestrial resources; geology and groundwater; hazardous materials; and aviation. See Chapter 3 of the Final SEIS for details.

In summary, the one auxiliary lane design option will have fewer footprint-based reasonably foreseeable effects; increased traveler choice regarding time of travel and transportation mode based on variable toll rates and improvements to transit and active transportation facilities; and, will cost less over the life of the project. This outweighs the one auxiliary lane design option's lower performance in traffic operations as compared to the non-selected two auxiliary lane design option. Therefore, the one auxiliary lane design option is included in the Amended Selected Alternative.

5.1.2 Bridge Configuration

As summarized in Section 4.3 and detailed in Chapter 2 of the Final SEIS, three bridge configuration design options were considered. This section summarizes the reasons why the **single-level fixed-span bridge**

[6] Vancouver 2011-2030 Comprehensive Plan– Policy PFS-5 (Vancouver 2011); Vancouver 2026-2045 Comprehensive Plan– Goal TM-1 (Vancouver 2026a); Portland 2035 Comprehensive Plan – Policy 9.6 (Portland 2023); Oregon Transportation Plan – Policy MO.3.2 (OTC 2023).

[7] This is a preliminary estimate of capital cost differences for general comparison purposes only. It does not account for potential increases in costs related to right-of-way, utilities, environmental mitigation, or other impacts, that require more advanced design to fully assess. Future operations and maintenance costs are also not included.

configuration design option is included in the Amended Selected Alternative rather than the single-level movable-span or double-deck fixed-span bridge configuration design options. A summary of reasonably foreseeable effects and benefits is provided in Section 2.2 of Appendix K of the Final SEIS.

The single-level fixed-span bridge configuration design option will have the same reasonably foreseeable effects as the non-selected design options in terms of outperforming the No-Build Alternative on seismic resiliency; reliability and mobility of highway traffic operations, public transit, and active transportation; and ability to meet the needs of freight movement by truck. Like the single-level fixed-span bridge configuration included in the Amended Selected Alternative, the non-selected bridge configuration options would also have provided wider horizontal navigation clearances, improved navigation safety for river users, and provided at least the minimum vertical navigation clearance of 116 feet as established by the U.S. Coast Guard (USCG) in the 2026 Preliminary Navigation Clearance Determination.[8] The single-level fixed-span configuration will provide 116 feet of vertical navigation clearance. The double-deck fixed-span would have provided 116 feet, as well, while a single-level movable-span would have provided 178 feet of vertical navigation clearance through use of bridge lift spans similar to the existing bridge configuration.

The reasonably foreseeable effects of the Amended Selected Alternative will be the same or similar to the reasonably foreseeable effects of the non-selected double-deck fixed-span or single-level movable-span design options with regard to: noise, water quality, and hydrology.

The single-level fixed-span bridge configuration design option has the following additional advantages over the two bridge configuration design options that were not selected.

- **Transportation** – The single-level fixed-span bridge configuration will eliminate bridge lifts, which would have continued under the No-Build Alternative and the single-level movable-span bridge configuration design option. The double-deck fixed span bridge would have had similar benefits to the selected bridge design option in this respect. Bridge lifts associated with the single-level movable-span bridge configuration would have interrupted highway travel for vehicles and trucks, transit service, and active transportation across the Columbia River, with the associated potential for increased crash rates.

  The single-level fixed-span bridge configuration will improve the perceived personal safety for active transportation users due to the increased visibility of passing vehicles, compared to the double-deck fixed-span bridge configuration. The lower bridge height and reduced grade of the single-level fixed-span bridge configuration, compared to a double-deck bridge configuration, will also benefit freight vehicle speed. The single-level movable-span bridge configuration would have had similar benefits in these respects. See Section 3.1, Transportation, of the Final SEIS for details.

- **Public Services** – With the single-level fixed-span bridge configuration, emergency vehicles will have better access to transit and active transportation facilities than with the double-deck fixed-span bridge configuration because transit and active transportation will be located at the same level as the roadway; this will improve emergency response times to transit and shared-use path incidents. When there is not an active bridge lift, the single-level movable-span bridge configuration would have had similar benefits in this respect. With the single-level fixed-span bridge configuration, emergency response time will not be delayed or disrupted due to bridge openings associated with the single-level movable-span bridge configuration. The double-deck fixed -span bridge configuration would have had similar benefits in this respect. See Section 3.6, Public Services and Utilities, of the Final SEIS for details.

- **Air Quality and Energy** – The single-level fixed-span bridge configuration will result in fewer air pollutant emissions than the single-level movable-span bridge configuration, which would have required vehicles

[8] The USCG's 2026 Preliminary Navigation Clearance Determination established a required vertical navigation clearance of greater than or equal to 116 feet above zero Columbia River Datum (CRD) for the new Columbia River bridges.

to idle while waiting for a bridge lift. The single-level fixed-span bridge configuration will also avoid the energy consumption that would have been required to operate a bridge lift. The double deck fixed-span bridge configuration would have had similar benefits in these respects. The single-level fixed-span bridge configuration will also result in fewer air pollutant emissions because of the lower profile grade of the bridge, which will reduce acceleration and braking of vehicles crossing the bridge when compared to the higher double-deck fixed-span bridge configuration. The single-level movable-span bridge configuration would have had similar benefits in this respect. See Section 3.10, Air Quality, and Section 3.12, Energy, of the Final SEIS for details.

- **Aviation** – The single-level fixed-span bridge configuration will have no encroachment into Pearson Field protected airspace, compared to the double-deck fixed-span bridge configuration design option that would have penetrated the airspace by up to 12.5 vertical feet through signs and lighting, or compared to the single-level movable-span bridge configuration design option that would have penetrated the airspace by approximately 64 feet through the lift towers. The single-level fixed-span bridge configuration will also be designed to discourage bird nesting and roosting and will incorporate deterrence measures to reduce potential for aircraft-wildlife strikes. The double-deck fixed-span and single-level movable span bridge configurations would have had similar benefits in this respect. See Section 3.22, Aviation, of the Final SEIS for details.
- **Constructability** – Compared to the double-deck bridge configuration design option, the single-level fixed-span bridge configuration will have fewer challenges associated with maintenance of traffic during construction. In particular, the transition of traffic from the existing spans and approaches to the new spans and approaches will be more efficient due to less change in grades and geometry. The single-level movable-span bridge configuration would have had similar benefits in this respect. The single-level fixed-span bridge configuration will also have a shorter construction duration than the movable-span bridge configuration, which would have included a complex lift span construction. The double deck fixed-span bridge configuration would have had similar benefits without having to construct a lift span; however, construction of a double-deck fixed span bridge configuration would have had construction complexities related to constructing a second bridge level.
- **Cost** – The single-level fixed-span bridge configuration design option is estimated to cost approximately $1.7 billion less than a single-level movable-span because it will have fewer structural and mechanical elements associated with the lift towers and bridge opening/closing mechanisms, thus reducing material quantities, design complexity, and construction labor, as well as long-term maintenance costs (IBR 2026). The single-level fixed-span bridge configuration design option is also likely to cost less than the double-deck fixed-span bridge configuration design option, which would require additional structural-related material and construction costs to stack two decks on each bridge.

Although the single-level fixed-span bridge will have a slightly wider footprint than the double-deck fixed-span bridge, resulting in additional overwater shading, the difference in effects to aquatic species or aquatic ecosystem function is minimal, as documented in Section 3.16, Ecosystems, of the Final SEIS, and in the Biological Opinion (BO) from NOAA Fisheries (Appendix O of the Final SEIS). Additionally, the single-level fixed-span will require a smaller in-water footprint than the single-level movable-span bridge configuration because it will have smaller bridge piers and pier foundations at Piers 5 and 6.

In summary, the single-level fixed-span bridge configuration design option will have fewer reasonably foreseeable effects to transportation, public services, air quality, energy, and aviation, and a lower cost than the non-selected bridge configuration options. Although the single-level fixed-span bridge configuration design option will have slightly greater effects to aquatic ecosystems compared to the non-selected double-deck bridge configuration, the single-level fixed-span bridge configuration will have fewer overall reasonably foreseeable effects. Therefore, the single-level fixed-span bridge configuration is included in the Amended Selected Alternative.

5.1.3 C Street Ramps

As summarized in Section 4.3 and detailed in Chapter 2 of the Final SEIS, two design options for the C Street ramps in Downtown Vancouver were considered: Amended Selected Alternative with or without the C Street ramps. This section summarizes the reasons why the **Amended Selected Alternative includes C Street ramps** rather than not including the C Street ramps. A summary of reasonably foreseeable effects and benefits is provided in Section 2.3 of Appendix K of the Final SEIS.

Including the C Street ramps in the Amended Selected Alternative will have the same reasonably foreseeable effects as the design option of not including the C Street ramps in terms of outperforming the No-Build Alternative in highway traffic operations, including congestion, travel time, and traffic safety. In addition, the two design options will have minor or no differences in reasonably foreseeable effects regarding: acreage of property to be acquired, benefits to the local economy, response times for emergency responders, noise, water quality, aviation, and reduction in air pollutants.

Including the C Street ramps has the following advantages over not including the C Street ramps in the Amended Selected Alternative.

- **Transportation** – The "with C Street ramps" design option will meet level of service (LOS) operating standards for seven local intersections that would not have been met if the "without C Street ramps" design option had been selected. These intersections are in downtown Vancouver and along Mill Plain Boulevard.

  Compared to not including the C Street ramps in the design, including the C Street ramps will also have fewer traffic impacts to the local street network, ramps, and collector or distributor operations near the Mill Plain Boulevard interchange; shorten traffic delay and decrease travel times on local streets, including the Mill Plain Boulevard interchange, thus benefiting local businesses in downtown Vancouver; and reduce congestion on local streets. See Section 3.1, Transportation, of the Final SEIS for details.

- **Land Use and Economics** – Including the C Street ramps will avoid impacts to local businesses related to traffic delay and increased travel times near the Mill Plain Boulevard interchange and in downtown Vancouver that would have resulted from not including the C Street ramps. See Section 3.4, Land Use and Economic Activity, of the Final SEIS for details.

- **Energy** – Including the C Street ramps will reduce congestion more than not including the C Street ramps, which leads to reduced idling on local streets. This, in turn, will result in increased vehicle fuel efficiency, fewer vehicle emissions, and lower energy consumption. See Section 3.12, Energy, of the Final SEIS for details.

Although the "with C Street ramps" design option will result in greater visibility of the highway infrastructure from Fort Vancouver than not including the C Street ramps design, and therefore have greater reasonably foreseeable visual effects on recreational viewers at the Fort, the difference is minimal. In addition, including the C Street ramps will realign approximately 170 linear feet more of the Discovery Historic Loop Trail than not including the C Street ramps, causing minor additional impacts to the trail. See Section 3.8, Parks and Recreation, and Section 3.9, Visual Quality, of the Final SEIS for details. Not including the C Street Ramps in the design would have likely cost less than including the ramps due to lower construction costs.

In summary, including the C Street ramps in the Amended Selected Alternative will result in fewer reasonably foreseeable effects on traffic, land use and economics, and energy consumption when compared to not including the C Street ramps. These effects outweigh not including the C Street ramps and their relatively lower anticipated effects related to visual quality, recreation, and cost. Therefore, the "with C Street" design option is included in the Amended Selected Alternative.

5.1.4 I-5 Mainline Alignment Through Downtown Vancouver

As summarized in Section 4.3 and detailed in Chapter 2 of the Final SEIS, two design options for the I-5 mainline alignment through Downtown Vancouver were considered. This section summarizes the reasons why the **centered I-5 design option is included in the Amended Selected Alternative** rather than the non-selected I-5 westward shift design option. A summary of reasonably foreseeable effects and benefits is provided in Section 2.4 of Appendix K of the Final SEIS.

The centered I-5 design option will have the same reasonably foreseeable effects as those anticipated under the non-selected I-5 westward shift design option in terms of outperforming the No-Build Alternative in highway traffic operations, including congestion, travel time, and traffic safety.

The Amended Selected Alternative with the centered I-5 design option has the following advantages over the I-5 westward shift design option:

- **Acquisitions, Displacements, and Neighborhoods** – The centered I-5 design option will acquire 1.9 acres less than anticipated under the I-5 westward shift design option. It will also displace 33 fewer residential units in the Esther Short neighborhood and displace three fewer businesses that collectively employ 135 people. See Section 3.3, Property Acquisitions and Displacements, and Section 3.5, Neighborhoods and Communities, of the Final SEIS for details.
- **Historic Resources** – Under the National Historic Preservation Act, the centered I-5 design option will contribute to a Section 106 adverse effect to the Normandy Apartments (a historic residential building and Section 4(f) property) through changes to the property's setting. However, the centered I-5 design will not result in physical destruction of the property, which would have occurred under the I-5 westward shift design.

  The centered I-5 design option will reconstruct and widen the I-5 corridor to the east of the House of Providence (a historic resource and Section 4(f) property). The widened roadway will remain within the existing boundary of the I-5 right of way but will require removal of the sloped embankment along the western edge of I-5 and construction of a new retaining wall parallel to the eastern boundary. Conversely, the I-5 westward shift design option would have expanded I-5 into the eastern portion of the House of Providence property boundary, requiring the permanent acquisition of approximately 9,800 square feet of the property; this effect will be avoided with the centered I-5 design option. See Section 3.8, Cultural Resources, of the Final SEIS for details.
- **Design and Construction Challenges** – The centered I-5 design option will have fewer design and construction challenges than the I-5 westward shift design option. The westward shift option would have required realigning the centerline of I- 5, which would have increased design and constructability challenges (e.g., shifting the centerline, grading and banking the roadway, tying into the local street overcrossings) and challenges related to maintenance of traffic during construction.

The centered I-5 design option will result in greater visibility of the highway infrastructure by recreational viewers at Kanaka Village[9] and Fort Vancouver; therefore, this design option will have greater reasonably foreseeable effects for visual quality than would have occurred for the I-5 westward shift design option. In addition, the centered I-5 design option will require permanent acquisition of 29,100 square feet of the Vancouver National Historic Reserve District, whereas the I-5 westward shift design option would have acquired 20,400 square feet. The centered I-5 design option will also result in physical destruction or damage

[9] Kanaka Village refers to the former site of an extensive multicultural settlement, located along the southwest side of Fort Vancouver National Historic Site.

to part of the Vancouver National Historic Reserve District by demolishing a portion of the Army Road System that the I-5 westward shift design option would have avoided.

In summary, the centered I-5 design option will have fewer reasonably foreseeable effects related to acquisitions, displacements, neighborhoods, and some historic resources, and will have fewer design and construction challenges than anticipated under the I-5 westward shift design option. These advantages outweigh the centered I-5 design option's relatively greater effects to visual quality and other historic resources. Therefore, the centered I-5 design option is included in the Amended Selected Alternative.

5.1.5 Park and Rides

As summarized in Section 4.3 and detailed in Chapter 2 of the Final SEIS, two design options for park and rides were considered. This section summarizes the reasons why the **dispersed parking design option is included in the Amended Selected Alternative** rather than the non-selected design option of two park and ride sites. A summary of reasonably foreseeable effects is provided in Section 2.5 of Appendix K of the Final SEIS.

The dispersed parking design option will have the same reasonably foreseeable effects as the non-selected two-site design option in terms of outperforming the No-Build Alternative by providing station access to support LRT ridership and providing 1,270 total parking spaces to serve the Waterfront LRT Station (570 parking spaces) and Evergreen LRT Station (700 parking spaces).

The dispersed parking design option has the following advantages over the two park and ride sites design option.

- **Land Use Plan Consistency** – The dispersed parking design option will be more compatible with local planning goals, policies, and plans for multiuse development, multimodal access, and attractive public spaces. [10] Dispersing the parking spaces rather than concentrating all parking spaces in two larger park and rides will help meet the projected demand for park and rides in downtown areas. See Section 3.4, Land Use and Economic Activity, of the Final SEIS for details.
- **Transportation** – The dispersed parking design option will distribute traffic across multiple access points, and contribute to improved intersection performance compared to the two park and ride site option. Intersection analysis that included both the two park and ride site option and dispersed parking design option are shown in Appendix E to the Transportation Technical Report in the Draft and Final SEIS, respectively. See Section 3.1, Transportation, of the Final SEIS for details.
- **Visual Quality and Ground Disturbance** – Dispersing parking capacity across more sites correlates to smaller sites in terms of area and structure height above ground or depth below ground, reducing the potential visual mass of single structures and the potential depth of ground disturbance when compared to what would have been needed with only two larger multilevel park and rides. Near the Waterfront LRT Station, site 1a will consist of a one-level aboveground parking structure, site 1b will consist of a six-level aboveground parking structure, and site 1c will consist of a surface lot. Without this dispersal, site 1b would have needed to be 10 to 12 levels high and site 1c would have needed to be four levels high. Near the Evergreen LRT Station, site 2a will consist of a three- to four-level underground structure and site 2b will use an existing parking structure. Without this dispersal, site 2a would have needed to be seven or more levels below ground. See Section 3.9, Visual Quality, of the Final SEIS for details.

The dispersed parking design option will result in more property acquisition and business displacement than the two park and ride sites design option would have needed.

[10] Vancouver 2011-2030 Comprehensive Plan– Policy CD-6 (Vancouver 2011); Vancouver 2026-2045 Comprehensive Plan – Policy 133 (Vancouver 2026a); Downtown Access, Mobility And Parking Plan (Vancouver 2026b).

In summary, the dispersed parking design option will have fewer reasonably foreseeable effects on land use plan consistency, transportation, visual quality and ground disturbance than the two-site option. This outweighs the dispersed parking design option's relatively greater effects related to acquisitions and business displacements. Therefore, the dispersed park and rides design option is included in the Amended Selected Alternative.

5.2 Ability of the Amended Selected Alternative to Meet the Purpose and Need

As described below, the Amended Selected Alternative will meet all six transportation needs described in the IBR Program's Purpose and Need statement (Chapter 1 of the Final SEIS), while the No-Build Alternative would not have met any of these transportation needs. The following subsections summarize the primary advantages of the Amended Selected Alternative over the No-Build Alternative in meeting the Purpose and Need statement for the IBR Program, which is summarized in Section 3 of this Amended ROD.

The six headings below reflect the six transportation needs identified in the Purpose and Need statement.

5.2.1 Growing Travel Demand and Congestion

The Amended Selected Alternative will address the Growing Travel Demand and Congestion Need by increasing access to transit and active transportation options (e.g., walking, biking), thereby increasing the use of alternative modes of transportation to vehicle use. Along with these other modes, variable-rate tolling on the new Columbia River bridges will contribute to shifts from personal vehicles to transit or active transportation opportunities and reduce overall vehicle volumes across the Columbia River on I-5. Daily measures of travel demand (vehicle miles traveled, vehicle hours traveled, and vehicle hours daily) in the year 2045 will be lower under the Amended Selected Alternative when compared to the No-Build Alternative.

As identified in the Final SEIS, the estimated number of people crossing the existing Interstate Bridge in 2045 would have been 241,900 per day under the No-Build Alternative. Under the Amended Selected Alternative, 251,100 people will cross the new Columbia River daily. High-capacity transit, improved active transportation facilities, and variable-rate tolling under the Amended Selected Alternative will increase the number of people crossing the new Columbia River bridges using transit or active transportation while reducing the daily number of vehicles.

The Amended Selected Alternative will outperform the No-Build Alternative in terms of traffic operations, including congestion, travel time, and traffic safety. As estimated in the Final SEIS, congestion in 2045 would have increased to 16 hours southbound and 14 hours northbound each day under the No-Build Alternative.[11] Compared to the No-Build Alternative, the Amended Selected Alternative will decrease southbound congestion by 70% (to 4.75 hours/day) and northbound congestion by 36% (to 9 hours/day). Travel times will

[11] The hours of congestion refers to the total number of hours that the corridor experiences congestion. ODOT and WSDOT measure congestion as speeds below a certain threshold. ODOT and WSDOT have historically measured congestion as when travel speeds drop below 75% of the posted speed limit due to constrained conditions. In the CRC EIS analysis, congestion was measured as occurring when travel speeds were below 35 miles per hour. To develop a consistent threshold across the region, ODOT and WSDOT measure congestion at 45 miles per hour as most of the posted speed limits in the greater Portland Metro Region are 60 miles per hour (75% of 60 miles per hour is 45 miles per hour). This applies to all freeway locations even if the posted speed limits are lower than 60 miles per hour. This is current ODOT and WSDOT standard practice and is being completed for all projects across the Portland Metro Region. Therefore, the IBR Program measured congestion as speeds below 45 miles per hour. See the IBR Final SEIS Transportation Technical Report (Section 3.3.4) for additional information on measuring congestion.

be reduced by 7% (to 54 minutes) in the AM weekday peak period (southbound) and 38% (to 26 minutes) in the PM weekday peak period (northbound) compared to the No-Build Alternative.

The Amended Selected Alternative will eliminate the lift spans on the Columbia River bridges, and the recovery times associated with bridge openings and gate closures will no longer contribute to the number and duration of congestion events.

In 2045, 10 intersections under the No-Build Alternative would not have met agency performance standards for LOS during either the AM or PM peak hours, compared to six intersections under the Amended Selected Alternative.

5.2.2 Impaired Freight Movement

The Amended Selected Alternative will address the Impaired Freight Movement Need by improving access, mobility, and safety for freight transportation.

The I-5 crossing is critical to national and international freight flow. I-5 provides direct international land connections to Mexico and Canada and is the primary truck route for local, regional, national, and international movement of goods through the Portland-Vancouver region. Trucks carry 55% of all freight in Clark County and 74% of all freight in the Portland-Vancouver region. Approximately $133 million in commodity value was transported daily across the Interstate Bridge in 2019. Forecasts from the Metro/RTC 2018 Regional Transportation Plan Regional Travel Demand Model show that by 2045, trucks will account for almost 15% of total trips across the new Columbia River bridges, which is an increase of 50% in truck traffic compared to 2019.

Overall, the Amended Selected Alternative will improve access, mobility, and safety for truck freight throughout the primary study area.[12] The Amended Selected Alternative will benefit truck freight by addressing growing travel demand and congestion, described above in Section 5.2.1, and by addressing safety and seismic vulnerability, described in Sections 5.2.4 and 5.2.6.

Under the Amended Selected Alternative, I-5 will be designed to current design standards as much as practicable, which specifically consider freight vehicles. While the elevation of the freeway lanes above the river will be higher than the existing Interstate Bridge, the grades will meet design standards for freight vehicles. Lane and shoulder widths will be increased, and highway ramps and interchanges will be rebuilt to meet current design standards for freight vehicles, improving safety. Compared to the No-Build Alternative, the Amended Selected Alternative will better accommodate freight movements to and from I-5, especially at the interchanges serving the ports and industrial areas near the bridge. In these major freight route locations, upgrades to collector-distributor lanes and the interchanges and ramps will improve freight movements by reducing the merging, weaving and queueing conditions that can have greater operational impacts on trucks. Collector-distributor lanes will separate local and through traffic, and revised interchanges and ramps will provide longer distances for trucks to safely merge and accelerate. All of these design considerations will improve travel time reliability and overall efficiency and safety for freight movement through the corridor.

5.2.3 Limited Public Transportation Operation, Connectivity, and Reliability

The Amended Selected Alternative will address the Limited Public Transportation Operation, Connectivity, and Reliability Need by expanding and improving access to public transportation. The Amended Selected

[12] The “primary study area” is the construction footprint. The primary study area runs along a 5-mile segment of I-5, approximately between the SR 500 interchange in Washington and the I 5/Columbia Boulevard interchange in Oregon, as well as the construction footprint for the expansion of the TriMet-owned Ruby Junction Light-Rail OMF in Gresham, Oregon. See the introduction to Chapter 3 of the Final SEIS for details.

Alternative will include extending LRT into Vancouver, adding three new LRT stations, providing more frequent and higher capacity express bus service on I-5, expanding new express bus service facilities, and modifying local transit service to integrate existing bus service with the new LRT service and stations. In addition, the transportation benefits identified under Section 5.2.1 (Growing Travel Demand and Congestion) will help improve transit reliability and operations for express bus service by reducing congestion, which would have adversely impacted public transportation service reliability and travel speed under existing conditions and the No-Build Alternative.

The Amended Selected Alternative will reduce travel times and improve travel-time reliability compared to the No-Build Alternative in most circumstances. The Amended Selected Alternative will reduce total travel times by transit via LRT and northbound express bus service between Vancouver and Portland. However, southbound am peak two hour period express bus transit travel times will be slightly longer than they would have been under the No-Build Alternative due to some of the bottlenecks farther south of the Program area. This longer travel time is due to more vehicle volumes crossing the Columbia River Bridges in the AM peak period. Several features of the Amended Selected Alternative will help reduce those bottlenecks by providing other modes for travel, including the extension of the MAX Yellow Line LRT to Vancouver and express bus on shoulder operations through the primary study area.

For purposes of the IBR Program environmental review, measures of transit reliability include miles of exclusive or reserved right of way,[13] the number of passenger miles that would occur in exclusive or reserved right of way, and the percentage of passenger miles that would occur in exclusive right of way. Under the Amended Selected Alternative, the extension of the Yellow Line from the Expo Center north to the new terminus at the Evergreen Station will be completely in its own right of way, and new shoulders will provide express bus-on-shoulder operations that are reserved exclusively for express buses. These improvements will both increase average weekday passenger miles in exclusive right of way for the Amended Selected Alternative compared to the No-Build Alternative.

5.2.4 Safety and Vulnerability to Incidents

The Amended Selected Alternative will address the Safety and Vulnerability to Incidents Need by reducing the risk of crashes compared to the No-Build Alternative. Under the No-Build Alternative, crash patterns along the I-5 mainline, on ramps, and at ramp terminals within the primary study area were anticipated to be similar to existing conditions, while crash frequencies were predicted to increase due to higher traffic volumes and additional hours when I-5 operated at or above capacity. Compared to existing conditions, the total number of crashes in the primary study area was predicted to increase by up to 28% by 2045 under the No-Build Alternative.

The Amended Selected Alternative is predicted to reduce total crashes by 13% compared to the No-Build Alternative. The Amended Selected Alternative will include modifications to I-5 access and the configuration of the interstate facility within the primary study area, including new or removed ramps, reconfigured interchanges, and access point changes. These modifications will make I-5 more consistent with modern design standards and will reduce weaving, thereby improving safety. Some of the interchange reconfigurations will also decrease the number of ramps or the lane mileage of those ramps; improve merging, diverging, and weaving distances; and separate movements via braided ramps and collector-distributor systems, which will further contribute to improved safety conditions and fewer predicted crashes.

[13] Exclusive right-of-way refers to segments of a project alignment that are dedicated to transit use and physically separated from general-purpose traffic, with access limited to transit vehicles.

5.2.5 Substandard Bicycle and Pedestrian Facilities

To meet the Substandard Bicycle and Pedestrian Facilities Need, the Amended Selected Alternative will provide a variety of active transportation improvements, thereby improving capacity, access, connectivity, safety, and user experience for trips across the bridge.

Under the No-Build Alternative, existing bicycle/pedestrian lanes on the current Interstate Bridge would have remained. These existing lanes are narrower than the current 10-foot design standard and are located extremely close to traffic lanes, which expose users to vehicular traffic, noise, and emission pollutants. Under the No-Build Alternative, substandard pedestrian and bicycle connectivity would continue to affect active transportation users' ability to travel within the Program area as increased population growth and continued development would place more pressure on existing active transportation facilities for walking, rolling, and riding in and between Portland and Vancouver.

The Amended Selected Alternative includes a new shared-use path over North Portland Harbor and the Columbia River, as well as various other active transportation facilities within the primary study area. The Amended Selected Alternative will include bicycle and pedestrian facilities for all ages and abilities on the new Columbia River bridges, as well as facilities to access these bridge connections. A two-way shared-use path on the new Columbia River bridges, approximately 24 feet wide in total, will be designed to meet ADA standards and will include other features to optimize user experience, safety, comfort, and connectivity. The shared-use path will be fully separated from vehicle lanes by a traffic barrier. To prevent conflicts between path users traveling at varying speeds, the shared-use path will provide separate spaces for people walking and biking. The alignment of the shared-use path in the Amended Selected Alternative will tie into planned active transportation projects in Portland and Vancouver.

The Amended Selected Alternative will include a system of shared-use paths, bicycle lanes, sidewalks, enhanced wayfinding, and other facility improvements for active transportation, improving capacity, access, safety, and user experience for trips across the bridge. The Amended Selected Alternative will also improve existing active transportation facilities and provide connections to the transit facilities to further extend regional mobility for active transportation users.

5.2.6 Seismic Vulnerability

To address the IBR Program's Seismic Vulnerability Need, the Amended Selected Alternative will improve seismic resiliency in the corridor by replacing the Interstate Bridge and I-5 bridge (North Portland Harbor) with modern, seismically resilient structures. The primary study area and region are located within the Cascadia Subduction Zone, which makes the region subject to geologic and seismic hazards such as earthquakes, tsunamis, and volcanic eruptions that can put people and infrastructure at risk.

The No-Build Alternative would have maintained the existing I-5 infrastructure in the primary study area and would not provide seismic upgrades to the Interstate Bridge or other I-5 structures. The existing structures were built before modern seismic codes were developed and could be substantially damaged in an earthquake. The existing structures are also nearing the end of their designed lifespans. The No-Build Alternative would also not have addressed the risks of increased scour from potential flooding and sediment load due to upstream, seismic-induced landslides, or lahars resulting from regional volcanic activity.

With the Amended Selected Alternative, all bridge structures, including the new Columbia River bridges, will be designed to current industry standards, including the American Association of State Highway and Transportation Officials (AASHTO) Load and Resistance Factor Design Bridge Design Specifications; ODOT and WSDOT Bridge and Geotechnical Design Manuals; and project-specific parameters agreed to by ODOT and WSDOT.

The Amended Selected Alternative will address the risks of increased scour that could result from potential landslides upstream caused by a major Cascadia Subduction Zone event. The new bridge pier design for the new Columbia River bridges and bridges over the North Portland Harbor will decrease the risk of bridge damage in the event of changes in river flow or sediment loads due to upstream landslides in the river.

6. MITIGATION COMMITMENTS, MONITORING AND ENFORCEMENT

Changes in federal, state, and local regulations, standards, and best practices since the CRC ROD have led to changes in the mitigation commitments made by the IBR Program team. This section and Appendix D replace the mitigation information from the CRC ROD. As detailed in Appendix D of this Amended ROD, the mitigation commitments will address the reasonably foreseeable effects associated with the Amended Selected Alternative, and may be relied upon for other federal permits or approvals issued by agencies (see Appendix E for a list of anticipated permits and approvals). Implementation of the mitigation measures in Appendix D is a material condition of this Amended ROD and will be incorporated in any funding agreement or approval that FHWA or FTA may provide for the construction of the Amended Selected Alternative. FHWA and FTA find that with the accomplishment of these mitigation commitments, the Joint Lead Agencies[14] will have taken all reasonable, prudent, and feasible means to avoid, minimize, and mitigate reasonably foreseeable effects from the Amended Selected Alternative.

A mitigation monitoring program will be established and implemented by the responsible parties for each construction package, which will apply to activities during final design, construction, and maintenance and operations. The goals of the mitigation monitoring program are: (1) ensuring the IBR Program fulfills the mitigation commitments set forth in this Amended ROD (Appendix D), in existing or future Program-level approvals (e.g., the BO), and in future federal/state/local permits and approvals for specific projects (i.e., projects listed in Section 2.3 of the Final SEIS); and (2) providing an oversight tool for FHWA and FTA to track mitigation requirement compliance and effectiveness. The mitigation monitoring program will consist of the following:

- Maintaining a current list or database of mitigation commitments.
- Tracking the status of implementation of the mitigation measures.
- Tracking the status of, and coordinating resolution of, any non-compliance events.

The mitigation commitments will be entered into a mitigation commitment tracking database with the following information: the source of the mitigation commitment (e.g., the BO), a description of the mitigation measure, when the measure will be implemented, and the party responsible for the mitigation implementation. Mitigation commitments that are the responsibility of contractors or design-builders will be written in the contract specifications in language that is biddable by contractors, buildable in practice, and enforceable.

During the construction phase, ODOT, WSDOT, TriMet, C-TRAN, and any other responsible party (as assigned) will use a proactive approach for monitoring and inspecting field work to ensure compliance with and successful implementation of the mitigation commitments. Requirements and procedures for monitoring, inspection, and reporting will be developed during final design and described in contract provisions.

Refer to Appendix D for the IBR Program's mitigation commitments.

[14] The Joint Lead Agencies include FHWA, FTA, ODOT, WSDOT, Metro, RTC, TriMet, and C-TRAN.

7. DETERMINATIONS AND FINDINGS

The following sections summarize legal compliance with relevant environmental laws. The CRC ROD contains specifics on the prior findings. This Amended ROD reiterates the prior findings from the CRC ROD in *italics*. While the general findings of compliance in the CRC ROD remain valid, the findings summarized below reflect new environmental information and updated compliance efforts. Additional information about the purpose, intent, and legislative history of each law below is provided in Chapters 3 and 4 of the Final SEIS.

National Environmental Policy Act (NEPA):

The CRC ROD determined that the requirements of NEPA found at 42 United States Code (U.S.C.) §§ 4371 et seq., were met; specifically, that:

- *"The environmental documents include a record of the environmental impact of the proposal; adverse environmental effects that cannot be avoided; alternatives to the proposal; and irreversible and irretrievable impacts on the environment.*
- *FTA and FHWA have cooperated and consulted with the Secretary of the Interior and the Administrator of the Environmental Protection Agency on the Project;*
- *The Project has undertaken extensive outreach efforts and many opportunities for public and agency comment have been provided."* (CRC ROD, p. 26) (Appendix A)

These findings remain valid but are updated with the following information. In addition, on February 25, 2025, the Council on Environmental Quality (CEQ) published an Interim Final Rule (IFR) removing the CEQ NEPA implementing regulations (90 Federal Register 10610). Consistent with this guidance and case law, the Final SEIS evaluated the reasonably foreseeable long-term and temporary effects of the No-Build Alternative and the Modified LPA. On July 3, 2025, FHWA, FTA, and the Federal Railroad Administration (FRA) issued a joint IFR updating 23 CFR Part 771. The IFR modified the joint regulations implementing NEPA in 23 CFR Part 771 to be consistent with the removal of regulations previously issued by CEQ, the amendments to NEPA included in the section of the Fiscal Responsibility Act of 2023 known as the Building United States Infrastructure through Limited Delays and Efficient Reviews (BUILDER) Act of 2023 (H.R. 1577, 118th Cong.(2023)), and amendments to NEPA regarding efficient environmental reviews included in the Infrastructure Investment and Jobs Act of 2021 (Public Law No. 117-58,135 Stat. 429 (2021)). The Final SEIS was consistent with the changes to NEPA described in 23 CFR Part 771. The introduction to Chapter 3 of the Final SEIS details changes in the legal landscape that occurred between publication of the Draft SEIS and publication of the Final SEIS.

Clean Air Act:

The CRC ROD determined that "*the Project is a part of the conforming regional transportation plans (RTP and MTIP) for the Portland metropolitan area, and because the Project will not create new localized violations of NAAQS, worsen an existing violation, or delay timely attainment of NAAQS, the FHWA and FTA find that the Project conforms with the Portland and Vancouver Maintenance Plans in accordance with EPA regulations governing such determinations"* (CRC ROD, p. 27) (Appendix A).

As of October 2017, the 20-year carbon monoxide maintenance planning period ended, and the area is designated by the U.S. Environmental Protection Agency (EPA) as in attainment for all criteria pollutants. Based on this attainment designation, conformity requirements do not currently apply. In addition, since the CRC ROD, EPA lowered the ozone National Ambient Air Quality Standards (NAAQS) in 2015 to 70 parts per billion and lowered the annual fine particulate matter ($PM_{2.5}$) standard in 2024 to 9 micrograms per cubic meter. The area was designated by EPA as in attainment for the revised NAAQS, and no new conformity requirements were triggered. EPA has also implemented progressively more stringent mobile source

regulations, including Tier 3 vehicle and fuel standards and updated heavy-duty vehicle rules. The analysis in Section 3.10 of the Final SEIS demonstrated that the Program meets current NAAQS and other recent federal guidance, such as FHWA's Updated Interim Guidance on Mobile Source Air Toxic Analysis in NEPA Documents and FHWA's Frequently Asked Questions for Conducting Quantitative Mobile Source Air Toxics (MSAT) Analysis for FHWA NEPA Documents (FHWA 2023, n.d.).

Because the Program is not subject to the Clean Air Act conformity requirements, and because the Amended Selected Alternative fulfilled MSAT guidance, FHWA and FTA find that the Program complies with applicable air quality regulations.

Clean Water Act (CWA):

The CRC ROD concluded that, "*with the use of state and local regulations and standards, and conformance with the WSDOT, ODOT, City of Vancouver, and City of Portland NPDES permits, FHWA and FTA find that the Clean Water Act requirements have been addressed by the Project to the level necessary to complete the NEPA analysis"* (CRC ROD, p. 28) (Appendix A).

These findings remain valid but are updated with the following information. Since the CRC ROD, the Clean Water Act (CWA) itself has not been substantially amended, but its implementation has changed through new regulations, court decisions, and Executive Branch actions that affect how waters are regulated and how federal projects are permitted.

The definition of "waters of the United States" (WOTUS), which determines the scope of CWA jurisdiction, has changed. EPA and the U.S. Army Corps of Engineers (USACE) issued a revised WOTUS rule in 2015 that expanded federal jurisdiction, followed by repeal and replacement efforts between 2019 and 2020. In 2023, the Supreme Court's decision in *Sackett v. EPA* narrowed CWA jurisdiction by limiting regulated waters to those with a relatively permanent surface connection to traditional navigable waters. EPA and USACE subsequently revised their regulations to conform to this decision.

Changes in the permitting processes and methodology, most notably for the Section 401 Water Quality Certification and Section 402 National Pollutant Discharge Elimination System (NPDES), have been incorporated into the IBR Program. For example, the analysis in the Final SEIS included updates to the list of Section 303(d)-listed impaired waters and reflects the updated WOTUS definition and conforming rule issued by EPA and USACE (40 CFR Part 120; 33 CFR Part 328). The Final SEIS also used current methodology for wetland evaluations and updated plant species lists developed by EPA and USACE.

The Program prepared a conceptual stormwater management design that meets the requirements of ODOT and WSDOT for the portions of the Amended Selected Alternative that are along I-5. The Program will comply with relevant ODOT and WSDOT stormwater management requirements. The Cities of Portland's and Vancouver's regulations, found in Portland's 2025 Stormwater Management Manual and Vancouver's Surface Water Management Program, govern the portions of the Amended Selected Alternative along City-managed roads. With the use of state and local regulations and standards, and conformance with the WSDOT, ODOT, City of Vancouver, and City of Portland NPDES permits, FHWA and FTA finds that the Amended Selected Alternative complies with the CWA requirements to the level necessary to complete the NEPA analysis.

Navigation and Navigable Waters, the General Bridge Act of 1946:

The CRC ROD determined that "*[p]rior to engaging in bridge construction or demolition activities, the Project will submit the necessary plans, specifications, drawings, and maps to the Secretary of Transportation for the Secretary's approval. The Project will apply for a Section 9 permit and will ensure that the Project complies with all permit conditions. Accordingly, FHWA and FTA find that Title 33 Navigation and Navigable Waters, the General Bridge Act of 1946 and Sections 9 and 11 of the U.S. Rivers and Harbors Act have been addressed to the level necessary to complete the Project NEPA analysis"* (CRC ROD p. 29) (Appendix A).

These findings remain valid but are updated with the following information. Since the CRC ROD, there have been several changes to USCG regulations and policies. A Memorandum of Agreement between USCG and FHWA and a Memorandum of Understanding among the USCG, FHWA, FTA, and FRA were executed that state that environmental documentation must include a discussion of potential reasonably foreseeable project effects to navigation and a summary of ongoing coordination with USCG. In addition, the USCG issued new bridge permit application guidance in July 2016 and updated it in March 2025 (COMDTPUB P16591.3E).

As summarized in Section 4.2 and 5.1.2 of this Amended ROD and detailed in Chapter 2 of the Final SEIS, modifications to the CRC Selected Alternative were made related to the configuration of the proposed replacement bridges over the Columbia River and North Portland Harbor. The updated analysis of navigation was provided in Section 3.2, Navigation, of the Final SEIS and the Navigation Impact Report (October 2025) (IBR 2025).

In January 2026, the USCG issued a Preliminary Navigation Clearance Determination (PNCD) that requires the new Columbia River bridges to have a vertical navigation clearance of greater than or equal to 116 feet. The IBR Program team will apply for general bridge permits from the USCG for the bridges proposed over the Columbia River and North Portland Harbor in accordance with the 2016 Bridge Permit Application Guidance (as amended in 2025) and will comply with all permit requirements. Section 3.2, Navigation, of the Final SEIS identified temporary reasonably foreseeable effects and a 6 to 8 year construction duration. The extent of the temporary restrictions to river vessels was not known at the time of Final SEIS publication but it was anticipated that accommodations could be made during construction to allow for passage of vessels up to the 116 feet PNCD navigational clearances through advanced coordination. Upon further design and bridge permit coordination with USCG, the IBR Program expects reduced VNC (100 feet) and horizontal navigation clearance (HNC) (150 feet) of the primary navigation channel for approximately 32 months to feasibly construct the replacement bridges over the Columbia River. FHWA and FTA have evaluated the new information on the duration of temporary closures to navigation channels; no new reasonably foreseeable effects were found to result, the Final SEIS remained valid, and no supplemental environmental study was determined to be necessary (see Section 2.2.1). In addition, the IBR Program team will comply with the USCG-FHWA-FTA-FRA Memorandum of Understanding (2014) and the USCG-FHWA (2014) Memorandum of Agreement. For these reasons, FHWA and FTA find that Title 33 Navigation and Navigable Waters, the General Bridge Act of 1946 has been addressed to the level necessary to complete the NEPA analysis.

Section 14 of the Rivers and Harbors Act and 33 U.S.C. § 408 Civil Works Alteration Permit:

The CRC ROD determined that "*the Project has initiated discussions with USACE, and has indicated that it will apply for a Section 408 Civil Works Alteration Permit and will comply with all permit requirements. Accordingly, FHWA and FTA find that Section 14 of the Rivers and Harbors Act as codified in 33 U.S.C. 408 has been addressed to the level necessary to complete the NEPA analysis"* (CRC ROD, p. 29) (Appendix A).

These findings remain valid, but are updated with the following information. Per 33 U.S.C. § 408, it is prohibited to impair "the usefulness of any sea wall, bulkhead, jetty, dike, levee, wharf, pier, or other work built by the United States," and approval of USACE is required for any "alteration or permanent occupation or use" of such facilities. Like the CRC Selected Alternative, the Amended Selected Alternative includes new and modified structures on existing flood control levees and ground alteration within established levee zones. In 2021, the IBR Program team reinitiated discussions with USACE and will apply for Section 408 Civil Works Alteration authorizations for proposed alterations to the federally authorized navigation channels and turning basin in the Columbia River, levees along North Portland Harbor, and other aids to navigation, and will comply with approval requirements. For these reasons, FHWA and FTA find that Section 14 of the Rivers and Harbors Act as codified in 33 U.S.C. § 408 has been addressed to the level necessary to complete the NEPA analysis.

Clean Water Act, Executive Order 11990 Protection of Wetlands and the role of NEPA:

The CRC ROD stated that the "*Project footprint would not encroach upon any delineated wetlands and would not discharge untreated stormwater runoff into any wetlands* and that as *required under Section 404, mitigation is required for the net 3,100 cubic yards of water in the Columbia River that the Project will displace, as well as the potential impacts to jurisdictional ditches that may occur"* (CRC ROD, p. 29) (Appendix A).

These findings are updated with the following information. Since the CRC ROD, the IBR Program team has updated the analysis of reasonably foreseeable effects to wetlands to reflect current conditions, updated regulations and guidance, and design modifications. This includes using the updated WOTUS definition and conforming rule issued by EPA and USACE. The Amended Selected Alternative will affect approximately 0.25 acres of wetland and 5.69 acres of wetland buffer.

ODOT and WSDOT will apply for necessary permits. The Program will include mitigation plans and actions to identify and implement habitat protection, restoration, and enhancement as appropriate. These actions are intended to provide a net conservation benefit for the unavoidable reasonably foreseeable effects that bridge construction and demolition have on species, habitats, and resource sites. For these reasons, FHWA and FTA find that NEPA and the CWA, as they relate to reasonably foreseeable effects to jurisdictional waters, have been addressed to the level necessary to complete the NEPA analysis.

Rivers and Harbors Act (Section 10 Waterway Structures Permit):

The CRC ROD determined that "*the bridge structures in navigable United States waters are under the jurisdiction of USCG and the General Bridge Act of 1946. The Project will apply for a Section 10 authorization using the Joint Aquatic Resources Permit Application (JARPA) and USACE Joint Permit Application (JPA) forms. The Project will ensure that the Project complies with all permit conditions. Accordingly, FHWA and FTA find that Section 10 of the Rivers and Harbors Act has been addressed to the level necessary to complete the NEPA analysis"* (CRC ROD, p. 30) (Appendix A).

These findings remain valid but are updated with the following information. The IBR Program team will apply for Section 404/Section 10 permits from USACE for reasonably foreseeable effects to designated WOTUS. Program activities underway to support the permit applications include wetland delineation, coordination with USACE to provide jurisdictional determination, and evaluation of potential reasonably foreseeable effects to wetlands and other waters, as well as evaluating reasonably foreseeable effects associated with excavation, filling, and other potential modifications to the navigation channels. The IBR Program team will ensure that all permit conditions are met. For these reasons, FHWA and FTA find that Section 10 of the Rivers and Harbors Act has been addressed to the level necessary to complete the NEPA analysis.

The Safe Drinking Water Act of 1974 (Sole Source Aquifer):

The CRC ROD determined that "[t]*he EPA reviewed the* [sole source aquifer report] *SSA report, and in July of 2010 provided conditional approval to the Project. The conditions included a determination that the Project needs additional monitoring and reporting to ensure the Project does not pose a risk for contaminating the aquifer and may require additional mitigation measures. The project sponsors will comply with the additional monitoring, reporting and mitigation requirements required by EPA, as well as implement the mitigation listed in the SSA report. WSDOT would be responsible for any monitoring that is required beyond the duration of the Project construction. Accordingly, FHWA and FTA find that the Safe Drinking Water Act has been addressed to the level necessary to complete the NEPA analysis"* (CRC ROD, p. 31) (Appendix A).

These findings remain valid but are updated with the following information. Since the CRC ROD, the IBR Program team has conducted updated analysis of groundwater and drinking water in the Program area, as detailed in Section 3.14, Water Quality and Hydrology, of the Final SEIS. In addition, the IBR Program team submitted an updated draft sole source aquifer report (SSA) report to EPA for review and comment. The IBR Program team incorporated EPA's comments and submitted a final version in February 2025. The IBR Program

team will comply with any additional monitoring, reporting and mitigation required by EPA, as well as implement the mitigation listed in the SSA report. For these reasons, FHWA and FTA find that the Safe Drinking Water Act has been addressed to the level necessary to complete the NEPA analysis.

Endangered Species Act (ESA):

The CRC ROD documented completion of ESA consultation and ESA approval through the National Oceanic and Atmospheric Administration Marine Fisheries Service's (NMFS's) issuance of a BO issued on January 19, 2011, and the U.S. Fish and Wildlife Services (USFWS's) issuance of a letter of concurrence (LOC) for threatened and endangered species and their habitats that could have been affected by the CRC project.

The implementation of ESA consultation has evolved since 2011; accordingly this finding is updated with this Amended ROD. ESA regulations finalized in 2019 altered standards for species listing, critical habitat designation, and interagency consultation under Section 7. Executive Order 13990 (2021) directed federal agencies to review and revise actions that weakened environmental protections, including ESA regulations, and Executive Order 14008 (2021) emphasized conservation, ecosystem resilience, and biodiversity as national priorities. Recent proposed rules would revise regulations to clarify statutory interpretation of species protections and critical habitat designations and align implementation of Section 7 consultation with recent Supreme Court guidance.

FHWA and FTA initiated formal consultation for the IBR Program with NMFS and informal consultation with USFWS through submittal of the Program's Biological Assessment on September 21, 2023. ESA-related approval of the IBR Program has been obtained through NMFS's issuance of a BO and USFWS's issuance of an LOC for threatened and endangered species and their habitats that may be affected by the Program (see Appendix O of the Final SEIS). The NMFS BO requires that certain terms and conditions be met as a condition of clearance of the IBR Program, and, as required by Section 7 of the ESA, NMFS also provided an incidental "take" statement with the BO that is dependent on implementing the identified reasonable and prudent measures. The BO was issued on September 5, 2025. USFWS's LOC concluding informal consultation on the IBR Program was issued on December 11, 2023.

The NMFS BO concluded that the Amended Selected Alternative is not likely to jeopardize the continued existence of any ESA-listed species. The NMFS BO also concluded that the Amended Selected Alternative will not destroy or adversely modify designated critical habitats for any ESA-listed species.

The USFWS LOC concluded that the Amended Selected Alternative may affect, but is not likely to adversely affect, bull trout (*Salvelinus confluentus*), streaked horned lark (*Eremophila alpestris strigata*), and designated critical habitat for these species.

The Final SEIS analysis, as well as the issued IBR Program BO and USWFS LOC (Appendix O of the Final SEIS), demonstrates that the IBR Program is compliant with the ESA. Because this finding is based on a new BO, it is consistent with (but amends) the finding in the CRC ROD.

Magnuson-Stevens Fisheries Conservation Management Act (MSFCMA):

The CRC ROD determined that "[u]*nder MSFCMA, NMFS is required to provide EFH conservation and enhancement recommendations to federal and state agencies for actions that adversely affect EFH. Of the fish species present in the project area, EFH applies only to Chinook and coho. Consultation with NMFS on effects to EFH has been completed in conjunction with the Section 7 ESA consultation. NMFS determined that adverse effects to EFH from the Project would occur. Their findings are addressed in conjunction with the BO issued on January 19, 2011. Conservation recommendations were included in the NMFS findings. Accordingly, FHWA and FTA find that the MSFCMA has been satisfactorily addressed"* (CRC ROD, p. 32) (Appendix A).

The 2025 BO replaces the 2011 BO with new consultation pursuant to the essential fish habitat (EFH) provisions in Section 305(b) of the MSFCMA [16 U.S.C. § 1855(b)]. NMFS found that the proposed action[1] has the potential to affect EFH for Pacific salmon species and provided conservation recommendations necessary to avoid, minimize, mitigate, or otherwise offset the reasonably foreseeable effects of the proposed action on EFH. NMFS originally published their BO on June 27, 2025. On August 28, 2025, FHWA and FTA responded to NMFS, accepting the EFH conservation recommendations and correcting one inconsistency in the BO text. NMFS responded by issuing a corrected version of the BO on September 5, 2025.

The Final SEIS analysis, as well as the issued BO and USWFS LOC (Appendix O of the Final SEIS), demonstrated that the Amended Selected Alternative meets current MSFCMA requirements and other recent federal guidance. For these reasons, FHWA and FTA find that the MSFCMA has been satisfactorily addressed.

Marine Mammal Protection Act (MMPA):

The CRC ROD determined that "*the Project may include a "take" of sea lions and seals, in the form of incidental harassment during construction activity, including pile driving and pile removal. A Letter of Authorization (LOA) for long-term, incidental harassment of sea lions and seals* [was] *sought from NMFS under the Marine Mammal Protection Act.* […] *Therefore, FHWA and FTA find that the Project has addressed the Marine Mammal Protection Act to the level necessary to complete the NEPA analysis"* (CRC ROD, p. 33) (Appendix A).

These findings remain valid but are updated with the following information. The IBR Program team submitted an application for a letter of authorization (LOA) to NMFS on January 14, 2025. The LOA was issued on May 14, 2026. The Final SEIS analysis, as well as the issued LOA, demonstrate that the Amended Selected Alternative meets current MMPA requirements. Because the findings are based on a new LOA, they are consistent with (but update) the findings in the CRC ROD. FHWA and FTA find that the IBR Program has addressed the MMPA to the level necessary to complete the NEPA analysis.

Fish and Wildlife Coordination Act:

The CRC ROD determined that "[t]*hrough the Section 404 permit process, USACE will coordinate with USFWS and other state and federal fish and wildlife agencies regarding impacts to fish and wildlife resources. The Project will apply for a Section 404 permit, and as such, FHWA and FTA find that the Fish and Wildlife Coordination Act has been addressed to the level necessary to complete the NEPA analysis"* (CRC ROD, p. 33) (Appendix A).

These findings remain valid but are updated with the following information. The IBR Program team will coordinate with USACE and USFWS, consider recommendations, and meet permit requirements to minimize reasonably foreseeable effects to fish and wildlife. For these reasons, FHWA and FTA find that the Fish and Wildlife Coordination Act has been addressed to the level necessary to complete the NEPA analysis.

Migratory Bird Treaty Act (MBTA) and Bald and Golden Eagle Protection Act (BGEPA):

The CRC ROD determined that "*construction activities would impact migratory birds, including peregrine falcons, through noise impacts and removal or degradation of habitat. Mitigation measures to address these impacts include impact avoidance and impact minimization. Impact avoidance would be addressed by timing vegetation removal to occur outside of nesting seasons for migratory birds. Demolition of existing structures would likely be scheduled outside of nesting seasons for native migratory birds to avoid direct impacts to active nests. If demolition activity is to occur during nesting season, and migratory bird nesting is deemed likely, exclusionary measures or other methods to prevent active nesting will be implemented. In very rare cases,*

[1] The term "proposed action" is used in the Biological Opinion (BO) and is retained in this determination and finding for consistency with the BO. The BO analyzed a footprint large enough to address the potential reasonably foreseeable effects of all the design options considered, so the term "proposed action" is inclusive of the Amended Selected Alternative.

removal of active nests may occur through permits held by USDA/Wildlife Services. Accordingly, with the mitigation described in the FEIS, FHWA and FTA find that the Migratory Bird Treaty Act and Bald and Golden Eagle Protection Acts have been addressed to the level necessary to complete the NEPA analysis" (CRC ROD, p. 33) (Appendix A).

These findings remain valid but are updated with the following information. Since the CRC ROD, an important MBTA change affecting the Program is the federal interpretation of incidental take. In 2017, the U.S. Department of the Interior interpreted the MBTA to exclude incidental take from otherwise lawful activities such as construction, but this interpretation was revoked in 2021. A subsequent 2023 final rule reaffirmed that incidental take of migratory birds is prohibited under the MBTA, while clarifying that enforcement will focus on activities where bird mortality is reasonably foreseeable and avoidable.

For the IBR Program, this means that construction and operation of the Amended Selected Alternative either 1) must be conducted in a manner that avoids incidental take of migratory birds (for example, by timing these activities such that any bird nest removal is conducted at a time when nests are inactive), or 2) that such activities be covered under an approved MBTA take permit. ODOT and WSDOT both maintain existing MBTA permits that may be applicable to certain construction and operation/ maintenance activities. If these permits are not applicable to a given activity that result in take of migratory birds, a separate MBTA take permit will be required.

Since the publication of the CRC ROD, USFWS issued updates to eagle take permitting regulations and guidance under the BGEPA. These updates primarily clarify permitting procedures and emphasize avoidance and do not affect the conclusions reached in the prior NEPA analysis.

No project-specific mitigation measures are required or proposed to comply with the BGEPA. There are no known bald eagle nests or communal roosts within the primary study area, and no documented bald eagle nests within 0.5 miles of the replacement bridge site, which is the distance within which disturbance could reasonably trigger BGEPA permitting considerations. Golden eagles are not known or expected to occur within the primary study area. Accordingly, a BGEPA permit is not anticipated to be required for construction or operation of the Amended Selected Alternative.

With the mitigation measures described in Appendix D, FHWA and FTA find that the MBTA and BGEPA have been addressed to the level necessary to complete the NEPA analysis.

Resource Conservation and Recovery Act (RCRA):

The CRC ROD determined that "[e]*xtensive mitigation procedures are described in Section 3.18.5 to ensure the safe handling of all hazardous materials encountered by, and/or used by, the Project. Accordingly, FHWA and FTA find that upon completion of all listed mitigation, the Resource Conservation and Recovery Act has been addressed to the level necessary to complete the NEPA analysis"* (CRC ROD, p. 34) (Appendix A).

These findings remain valid but are updated with the following information. Since the CRC ROD, the IBR Program team has conducted new analysis to reflect changed conditions and regulatory changes. Several changes to RCRA have guided how construction wastes are characterized, managed, and mitigated. The Hazardous Waste Generator Improvements Rule (2016) clarifies generator categories and emergency preparedness requirements applicable to typical bridge-construction waste streams such as spent solvents, coatings, blasting residues, used oils, and absorbents. In addition, revisions and court decisions related to the Definition of Solid Waste and recycling exclusions (2015–2019) influences reuse or recycling of construction materials (e.g., steel, concrete, spent abrasives).

As detailed in Section 3.18, Hazardous Materials, of the Final SEIS, an environmental database search and supporting site investigations of the primary study area identified 579 sites that could potentially contain hazardous materials. Updated mitigation commitments, as detailed in Appendix D, include commitments to minimize the production and generation of hazardous materials, as well as commitments to handle and

dispose of any hazardous materials. For these reasons, FHWA and FTA find that upon completion of all listed mitigation, the RCRA has been addressed to the level necessary to complete the NEPA analysis.

Section 106 of the National Historic Preservation Act (NHPA):

The CRC ROD documented compliance with Section 106 for the CRC project and resolution of adverse effects to historic and archaeological resources through the Section 106 Memorandum of Agreement (MOA) dated September 8, 2011. The MOA was developed in consultation with the Oregon State Historic Preservation Office (SHPO), Washington State Department of Archaeology and Historic Preservation (DAHP), tribes, and consulting parties. The CRC ROD required compliance with the MOA stipulations. This Amended ROD updates the CRC ROD finding regarding the NHPA.

Because additional properties will become 50 or more years of age at the time of the IBR Program's anticipated completion date, and because the Amended Selected Alternative will have a different construction footprint, the IBR Program terminated the CRC Section 106 MOA and initiated a new undertaking under Section 106. As detailed in Appendix A of the Final SEIS, the IBR Program team initiated consultation and invited 38 tribes and Native Hawaiian Organizations and 43 other agencies and organizations to participate. Ten federally recognized tribes, nine agencies, and 18 other organizations accepted invitations to consult. Twelve historic built environment resources that are either listed or eligible for listing on the National Register of Historic Places (NRHP) will be adversely affected, and 11 known NRHP-eligible archaeological sites may be affected by the Amended Selected Alternative. The 12 built environment resources are:

- Jantzen Beach Moorage (OR 111)
- Jantzen Beach Water Tank (OR 109)
- Harbor Shops (OR 107)
- Interstate Bridge northbound (OR 50; WA 381a)
- Interstate Bridge southbound (OR 51; WA381b)
- Bridge Substation (WA 1192)
- Normandy Apartments (WA 149)
- Vancouver National Historic Reserve Historic District (WA 1357)
- Officers Row Historic District (WA 918)
- Pearson Field Historic District (WA 369)
- Vancouver Barracks Historic District (WA 1358)
- Fort Vancouver National Historic Site (WA 1359)

Adverse effects to the above historic and archaeological resources are resolved through the new IBR Program Section 106 Programmatic Agreement (PA) executed April 20, 2026. The PA was developed in consultation with the SHPOs, tribes, and consulting parties. This Amended ROD requires compliance with the following PA stipulations by the effective date and duration of the agreement:

- Roles and responsibilities for all parties
- Consultation and public engagement procedures
- Standards and guidelines applicable to the process
- Process and requirements for historic built environment resources
- Requirements for archaeological investigations, identification, evaluations, assessments of effects, and resolution of adverse effects

- Process and schedule for consideration of historic properties of religious and cultural significance to Indian Tribes
- Process for consultation regarding program changes
- Process and requirements for post-review discoveries, treatment of human remains, and training
- Requirements for confidentiality of information
- Procedures for the monitoring of agreement performance, dispute resolution, amendments, and termination

Appendix F of this Amended ROD includes a fully executed copy the PA detailing the stipulations committed to in this Amended ROD. Based on the foregoing, FHWA and FTA find that the requirements under the NHPA (16 U.S.C. § 470) and, in particular, Section 106 consultation, for the IBR Program have been fulfilled.

Section 4(f) of the Department of Transportation Act:

The CRC ROD determined that the requirements of Section 4(f) (49 U.S.C. § 303 and 23 U.S.C. § 138) were met. Specifically, it determined that: "*there is no feasible and prudent alternative to the use of the Section 4(f) resources under the SA* [CRC Selected Alternative]*; the project includes all possible planning to minimize harm to the Section 4(f) resources; the Project includes all reasonable and prudent measures to minimize or mitigate for unavoidable adverse effects to the Section 4(f) resources; and the least overall harm alternative is the SA [*CRC Selected Alternative*] and that all of the provisions of Section 4(f) have been satisfactorily addressed"* (CRC ROD, p. 35) (Appendix A).

These findings are updated with this Amended ROD. Chapter 4 of the Final SEIS, the Section 4(f) Evaluation, documented that the Modified LPA meets the requirements of Section 4(f), including concurrence of the officials with jurisdiction over Section 4(f) protected properties with *de minimis* impact and temporary occupancy exception determinations; therefore, FHWA and FTA determine the following:

- The Amended Selected Alternative will have:
  - Use, with greater than *de minimis* impact, of seven Section 4(f) protected historic sites and one public park (Table 4-8 of the Final SEIS),
  - Use, with *de minimis* impact, of two public parks and four historic sites (Table 4-3 and Table 4-5 of the Final SEIS), and
  - The temporary occupancy exception will apply to five historic sites (Table 4-5 of the Final SEIS).
- There is no feasible and prudent alternative that completely avoids all Section 4(f) properties.
- The Modified LPA includes all possible planning to minimize harm.
- The Modified LPA with single-level fixed-span bridge configuration, one auxiliary lane, and centered I-5 design options (the Amended Selected Alternative) is the alternative that causes the least overall harm.

Section 6(f) of the Land and Water Conservation Fund (LWCF) Act and Federal Lands to Parks (FLP):

The CRC ROD determined that *"the requirements of the LWCF Act have been met to the level necessary to complete the NEPA analysis"* (CRC ROD, p. 39) (Appendix A). These findings remain valid but are updated with the following information.

Section 3.21 of the Final SEIS evaluated the Section 6(f) and FLP requirements as they apply to the Amended Selected Alternative. A temporary construction easement at East Delta Park of approximately 0.1 acres and lasting less than 180 days will be required to construct a retaining wall in ODOT right of way. Consultation with the Oregon Parks and Recreation Department and the City of Portland indicates this will be a temporary

non-conforming use. FHWA and FTA find that no parks protected by Section 6(f) of the LWCF Act will be converted to permanent non-park use.

The Amended Selected Alternative includes construction of a new shared-use path that will link Main Street and downtown Vancouver on approximately 0.08 acres within Old Apple Tree Park and require an inspection and maintenance easement within the park. In consultation with the National Park Service and City of Vancouver, FHWA and FTA determined that this activity will be consistent with the deed and program of utilization for conveyance under the FLP for Old Apple Tree Park.

Approximately 5,100 square feet of land conveyed to the City of Vancouver through the FLP Program will be required for I-5 right of way. The IBR Program team will coordinate with the National Park Service and General Services Administration to transfer the property to a federal public-benefit conveyance process through FHWA, as allowed by the FLP Program.

For these reasons, FHWA and FTA find that the right-of-way requirements of Section 6(f) and the FLP Program are met to a level sufficient to complete the NEPA analysis.

Federal Aviation Administration (**FAA) Notice of Proposed Construction or Alteration:**

The CRC ROD determined that "[t]*here are two airports that could be impacted by the Project: Portland International Airport and Pearson Field. Impacts to these airports and their respective airspace were described in the FEIS. FTA and FHWA find that the Project will not impact Portland International Airport and will have a beneficial impact to Pearson Field by removing the lift towers, on the existing bridges, which intrude on its protected airspace. Additionally, the* [FAA] *will perform an airspace review of the proposed development when the Project submits the Notice of Construction, Alteration, Activation and Deactivation of Airports application pursuant to 14 CFR Parts 77 and 157. The FAA will determine the effects of the proposed project upon the safe and efficient utilization of navigable airspace. Once FAA has determined that the* [CRC Selected Alternative] *is consistent with existing airspace utilization and procedures, the Project will meet the appropriate requirement. Accordingly, FTA and FHWA find that the standards and requirements of 14 CFR Parts 77 and 157 have been addressed to the level necessary to complete the NEPA analysis"* (CRC ROD, p. 39) (Appendix A).

These findings remain valid but are updated with the following information. The Amended Selected Alternative will have no reasonably foreseeable long-term effects on aviation activities at Portland International Airport and will avoid intrusions to protected airspace at Pearson Field. Obstacle departure procedures will be required to avoid the bridges under the Amended Selected Alternative, and the climb gradient will be reduced to 474 feet per nautical mile (down from 650 feet per nautical mile under existing conditions and the No-Build Alternative). In addition, bridge features under the Amended Selected Alternative will be designed to reduce potential for aircraft wildlife strikes, compared to the No-Build Alternative. The Final SEIS also evaluated reasonably foreseeable effects to Scappoose Airport associated with the wetland and habitat restoration at the Columbia Bottomlands mitigation site and concluded that there will be no change in the risk of wildlife hazards to aviation.

The FAA will perform an airspace review of the Amended Selected Alternative when the IBR Program team submits the Notice of Construction, Alteration, Activation and Deactivation of Airports application. The FAA will determine the reasonably foreseeable effects of the Amended Selected Alternative on the safe and efficient utilization of navigable airspace. Once the FAA has determined that the Amended Selected Alternative is consistent with existing airspace utilization and procedures, the Program will satisfy the appropriate requirement. For these reasons, FHWA and FTA find that the standards and requirements of 14 CFR Parts 77 and 157 have been addressed to the level necessary to complete the NEPA analysis.

Americans with Disabilities Act (ADA) / Architectural Barriers Act (ABA):

The CRC ROD determined that the *Project, "as illustrated in the preliminary designs has been designed to meet all ADA requirements and the final design will produce further construction details. In addition, the light rail*

vehicles to be purchased as part of the project will all be low-floor vehicles that provide accessibility for disabled individuals. Accordingly, FTA and FHWA find that the standards and requirements of the ADA and ABA have been met" (CRC ROD, p. 40) (Appendix A).

These findings remain valid, but are updated with the following information. Since the CRC ROD, the 2010 ADA Standards for Accessible Design became mandatory (March 2012) for new construction and alterations, including transportation facilities. Under the Amended Selected Alternative, the IBR Program team will design and construct facilities to meet ADA and ABA standards. For these reasons, FHWA and FTA find that the standards and requirements of the ADA and ABA have been met.

Farmland Protection Policy Act of 1981:

The CRC ROD determined that the "*Project is unlikely to induce sprawl, and will likely promote compact urban development. Metro, as the responsible agency for the urban growth boundary around the Metro area, has a long history of effective growth management, and the City of Portland has a sophisticated zoning code with provisions for focusing growth where desired and encouraging compact mixed-use development around transit facilities. The land use regulations in the City of Vancouver and Clark County also have robust growth management policies and regulations. Accordingly, FHWA and FTA find that the Project does not substantially increase the potential for loss of farmland in the Portland-Vancouver region and that the Project is compatible with state and local programs to protect farmland, and that no further action by Project is needed concerning this Act"* (CRC ROD, p. 40) (Appendix A).

These findings remain valid, but are updated with the following information. As described in Section 3.4, Land Use and Economic Activity, of the Final SEIS, the Amended Selected Alternative is expected to facilitate planned growth and development. However, this growth and development will be focused such that its magnitude and location will be constrained by and consistent with local and regional land use and transportation plans. For these reasons, FHWA and FTA find that the Amended Selected Alternative does not substantially increase the potential for loss of farmland in the Portland-Vancouver region and that the IBR Program is compatible with state and local programs to protect farmland, and that no further action by the IBR Program is needed concerning this act.

Noise Control Act of 1972 / Quiet Communities Act:

The CRC ROD determined that [w]*ith the completion of the mitigation measures cited in this document, FTA and FHWA find that the noise and vibration requirements of these Acts will be met* (CRC ROD, p. 41) (Appendix A).

These findings remain valid, but are updated with the following information. Since the CRC ROD, FHWA, WSDOT, and ODOT have published updated traffic noise assessment guidance and FTA has published updated noise and vibration guidance. Section 3.11, Noise and Vibration, of the Final SEIS detailed the noise and vibration analysis methods, including all relevant guidance updates since the CRC ROD, reasonably foreseeable effects and mitigation, and compliance with local noise regulations. Noise abatement by noise walls is the only abatement measure that was found to meet abatement criteria while maintaining normal traffic operations and IBR Program objectives for each affected area. In Washington, 16 noise wall locations were assessed; 14 met feasibility criteria, and 10 were both feasible and reasonable, with some replacing existing structures. In Oregon, one of three evaluated sites met both feasibility and reasonableness standards. ODOT and WSDOT will further review these 11 recommended noise wall locations during final design. Based on the findings of this analysis, ODOT and WSDOT will further evaluate traffic noise abatement measures in the form of noise walls during the final design of the proposed Modified LPA. The 11 noise wall locations (10 in Washington and one in Oregon) determined to be feasible and reasonable will be re-assessed in detail during final design.

Accordingly, and with the completion of the mitigation measures cited in this document, FHWA and FTA find that the noise and vibration requirements of the Noise Control Act of 1972 and Quiet Communities Act will be met.

Executive Order 13175 Consultation and Coordination with Indian Tribe Governments:

The CRC ROD determined that the requirements of Executive Order 13175 were satisfactorily addressed by the CRC project. Specifically, it determined that:

- *WSDOT, ODOT, FHWA, and FTA are committed to government-to-government consultation with tribes on projects that may affect tribal rights and resources. The CRC tribal consultation process is designed to encourage early and continued feedback from, and involvement by, tribes potentially affected by the Project, and to ensure that their input will be incorporated into the decision-making process.*
- *Although tribal consultation and government-to-government tribal consultation is being undertaken as a distinct outreach effort, tribal involvement is also occurring during agency coordination and public involvement.*
- *During the NEPA process, consultation and coordination was conducted with the following Indian Tribe Governments: the Chinook Tribe, Confederated Tribes and Bands of the Yakama Nation, Confederated Tribes of the Colville Reservation, Confederated Tribes of the Grand Ronde Community of Oregon, Confederated Tribes of the Siletz Reservation, Confederated Tribes of the Umatilla Reservation, Confederated Tribes of Warm Springs Reservation of Oregon, Cowlitz Indian Tribe, Nez Perce Tribe of Idaho, Spokane Tribe of the Spokane Reservation, and Nisqually Indian Tribe.*
- *Meetings with the Washington State Department of Archaeology and Historic Preservation (DAHP) and the Oregon State Historic Preservation Office and tribes were held. Comments received were responded to and incorporated into the FEIS.* (CRC ROD, p. 42) (Appendix A)

These findings remain valid, but are updated with the following information. The IBR Program team reinitiated consultation in 2020 with the tribes identified above, as well as DAHP and the Oregon SHPO. Comments on the Draft SEIS were received from the Confederated Tribes of Grand Ronde and the Cowlitz Indian Tribe; these letters were responded to and feedback was incorporated in the Final SEIS. Tribal consultation is detailed in Appendix A, Agency and Tribal Coordination, of the Final SEIS.

Executive Order 12372 Intergovernmental Review of Federal Programs:

The CRC ROD determined that "[d]*uring the course of the alternatives analysis, the DEIS, selection of the locally preferred alternative, completion of preliminary design, and the FEIS, state and local agencies were directly involved in the project. Technical, executive and steering committees comprised of state and local staff, executives and elected/appointed officials were coordinated with during each Project phase. Documentation of these efforts is included in Chapter 2 and Appendix A of the FEIS. Accordingly, FTA and FHWA find that the requirements of Executive Order 12372 have been met by the Project"* (CRC ROD, p. 42) (Appendix A).

These findings remain valid, and the IBR Program team has continued to consult with and solicit comments from state and local governments whose jurisdictions will be affected by the Program. Agency coordination is detailed in Appendix A, Agency and Tribal Coordination, of the Final SEIS. For these reasons, FHWA and FTA find that the requirements of Executive Order 12372 have been met by the Program.

Executive Order 11988 Floodplains:

The CRC ROD determined that the "[p]*ortions of the I-5 highway and supporting infrastructure currently exist within the Columbia River's floodplain and within the river itself, including portions of the highway system that will experience an increased footprint as a result of the Project. A flood-rise analysis will be conducted during final project design, when the bridge design is further advanced, to precisely calculate the impact that the Project, including the Project's piers in the water, would have on flood elevation, in accordance with local and state regulations and Executive Order 11988"* (CRC ROD, p. 43) (Appendix A).

These findings remain valid, but are updated with the following information. Since the CRC ROD, the IBR Program team has conducted additional analysis of the floodplains and to avoid, minimize, and mitigate reasonably foreseeable effects associated with the occupancy and modification of floodplains. As summarized in Section 3.14, Water Quality and Hydrology, of the Final SEIS, the IBR Program team, in compliance with Executive Order 11988, calculated the water surface elevations in the main channel of the Columbia River and North Portland Harbor in the primary study area. Based on the current Columbia River Bridge design details and the assumptions for the proposed future designs for bridges in North Portland Harbor, there are no calculated increases in water surface elevation that meet or exceed the established threshold. Section 6 (titled Executive Order 11988 Compliance Summary) of the Final Location Hydraulic Study, demonstrates that the requirements of 23 CFR § 650.111 are met and that the IBR Program will not result in significant encroachment, therefore obviating the requirements of 23 CFR § 650.113.

For these reasons, FWHA and FTA find that the Program has satisfactorily avoided, to the extent possible, the reasonably foreseeable effects associated with the occupancy and modification of floodplains and avoided floodplain development wherever there is a practicable alternative. FWHA and FTA find that the Program has satisfactorily addressed, and the Amended Selected Alternative will comply with, Executive Order 11988.

8. PUBLIC INVOLVEMENT

The description of public involvement in the CRC ROD is unchanged, as it describes the record of activities conducted prior to the CRC ROD. That public involvement process is supplemented with the public involvement conducted for the IBR Program. The IBR Program team has been engaging with local agencies, tribal governments, local communities and organizations, and the public since late 2020; and has conducted formal, targeted community engagement since February 2021. Targeted engagement has included outreach to the following groups: residents, commuters, transit users, business and freight industry representatives, neighborhood associations and community groups, tribal governments, elected officials, and maritime industry representatives. The IBR Program team considered all comments received, including those obtained through these engagement efforts, and incorporated recommendations as appropriate. In effect, this engagement has helped shape the communications strategy and implementation, the environmental review process, and the design options that were considered as part of the Modified LPA. More information about the IBR Program team's public involvement efforts can be found in Final SEIS Appendix B, Public Involvement.

The Draft SEIS was published on September 20, 2024, and a 60-day public comment period was held from publication to November 18, 2024. The Program received more than 3,600 public comment submissions that included over 9,000 individual comments.[16] While feedback covered a range of topics, the four topic areas with the most comments were transportation, design, tolling, and alternatives. The IBR Program team considered all comments and incorporated feedback into the Final SEIS. Responses to comments on the Draft SEIS are provided in Final SEIS Appendix S, Draft SEIS Comments and Responses. The IBR Program team will continue working with partners and the community during final design.

[16] A submission refers to the entire document submitted, such as an email, letter, or comment form. Each submission was reviewed and separated into comments based on topic. A single submission can contain multiple comments.

9. RESPONSES TO COMMENTS RECEIVED ON THE FINAL SEIS

The notice of availability for the Final SEIS was published on April 17, 2026. To the extent feasible, the Final SEIS was transmitted on the same day the notice of availability was published to any persons, organizations, or agencies that submitted comments on the Draft SEIS or requested a copy. Public notification of availability of the Final SEIS included the following:

- Program website
- Program newsletter
- Program social media channels on LinkedIn, Facebook, X, and Instagram
- Mailed notice to residents and businesses within the study area
- Email notice to all commenters on the Draft SEIS who provided an email address
- Email notice to other stakeholder groups, including elected officials, jurisdictions, neighborhood associations, community-based organizations, and tribes
- Email notice to all individuals, agencies, and organizations identified in Appendix G (List of Recipients) of the Final SEIS

Per 23 CFR § 771.127(a), FHWA and FTA are required to wait at least 30 days after publication of the Final SEIS before completing and signing a Record of Decision (ROD). Within that 30-day period (between April 17, 2026, and May 16, 2026), the IBR Program received a total of 36 submissions commenting on the Final SEIS, which were submitted by voicemail[1] and email (collectively referred to as "submissions" in this document). Each of these submissions were considered by FHWA and FTA.

The issuance of a final EIS (or SEIS) does not require a formal comment period under NEPA implementing regulations. FTA's *Standard Operating Procedure No. 14* and FHWA's *Technical Advisory T 6640.8A* provide direction to respond to any new substantive comments received, as appropriate, and to provide a summary of other, non-substantive comments.

A comment on the Final SEIS was considered to raise new substantive issues if it pertained to new information presented in the Final SEIS (i.e., information or analyses that were not previously made publicly available in the Draft SEIS), identified errors in the Final SEIS, would result in substantive changes to the Final SEIS or its underlying analyses, or would alter the final decision. Of the 36 submissions received, 15 include new substantive comments, 14 include only non-substantive comments, and seven include only comments on properties that would potentially be acquired.

- For the 15 submissions that include new substantive comments, responses to each of the new substantive comments are included in Appendix G.1. Non-substantive comments in these submissions are not responded to but are summarized in the list below.
- In 14 submissions, none of the comments met the threshold of new substantive (included in Appendix G.2). Non-substantive comments are similar to those that were previously received on the Draft SEIS and that were addressed in Appendix S of the Final SEIS, or were comments on topics unrelated to NEPA or the Final SEIS. The following is a list of the topics raised in the comments that did not meet the threshold of

[1] Voicemails were received from the voicemail service as an audio file and an automatically generated transcript. The transcript was revised as needed to correct typographical errors and included as a submission.

new substantive comments and the number of submissions in which the theme occurred (these counts do not account for the same submission submitted multiple times by the same commenter).

  - Opposition to light-rail transit (included in 10 submissions)
  - General opposition to the IBR Program (included in three submissions)
  - Tolling sentiment (included in three submissions)
  - Dismissed alternatives (included in two submissions)
  - Opposition to emphasis on active transportation (included in two submissions)
  - Bridge aesthetics (included in two submissions)
  - Fiscal responsibility (included in two submissions)
  - Acquisitions (included in one submission)
  - Traffic congestion (included in one submission)
  - Transit ridership (included in one submission)
  - Past voting on light-rail (included in two submission)
  - Bridge height (included in one submission)
  - General support for light-rail transit (included in one submission)
  - Bridge safety (included in one submission)
  - FTA Capital Investment Grants (included in two submissions) [1]

- For the seven submissions with only specific questions from potentially affected property and business owners (included in Appendix G.3 of this Amended ROD), the IBR Program's Right-of-Way Team responded to these inquiries directly.

The IBR Program also received 11 general comments through the Program's voicemail and info@interstatebridge.org inbox. These were general inquiries to the IBR Program that were unrelated to NEPA and the Final SEIS; therefore, they are not included in this Amended ROD. The IBR Program's Communications Team responded to these commenters directly.

[1] The IBR Program Final SEIS was prepared to satisfy NEPA requirements related to environmental review and decision-making. The FTA Capital Investment Grants (CIG) program is a separate federal funding process that uses different evaluation methods and criteria for a different purpose. Comments focused specifically on CIG program requirements or analyses fall outside the scope of the NEPA review.

10. AGENCY AND TRIBAL COORDINATION

The description of agency and tribal coordination in the CRC ROD is unchanged, as it describes the record of coordination conducted prior to the CRC ROD. Since the IBR Program was restarted, the Program has engaged in extensive coordination with federal, state, and local agencies, as well as with federally recognized tribes, building on the substantial collaborative foundation established during the earlier CRC project. Agency coordination has continued since the initiation of the IBR Program in 2021 through a structured framework that includes lead, cooperating, and participating agencies, each providing expertise and fulfilling responsibilities aligned with their legal authorities. FHWA and FTA have served as federal co-leads, overseeing NEPA compliance, permitting integration, and consultation under the ESA and the NHPA. State and local lead agencies, including ODOT, WSDOT, TriMet, C-TRAN, Metro, and RTC, have participated in ongoing review of methodologies, design development, and public involvement. Cooperating agencies, which include NMFS, USACE, USCG, the National Park Service, EPA, and DAHP, have contributed technical expertise necessary to support permitting decisions. Participating agencies and tribes, including (but not limited to) FAA, the Cities and Ports of Portland and Vancouver, Oregon Department of Environmental Quality, and Washington State Department of Ecology, have been engaged to identify issues early, review technical approaches, and support environmental compliance.

This coordination has included regular technical working groups, interdisciplinary review of methodologies, and iterative development of the Draft and Final SEIS. Agencies participate throughout milestones and within their jurisdictional expertise, including review of Draft and Final SEIS materials, development of mitigation measures, preparation of the BO, finalization of the PA under Section 106, and completion of the Final SEIS. Continuing coordination will also support permitting and design refinements.

The IBR Program team also has conducted robust and ongoing government-to-government consultation with tribes. Initial outreach began during the CRC project and was restarted in 2020 for the IBR Program, with consultation extended to a broad set of tribes based on geographic, historical, and cultural ties to the Program area. Ten federally recognized tribes have actively participated in consultation to date. Engagement has included regular meetings, field reviews, and technical discussions involving tribal natural and cultural resource staff; review of methodologies, design screening reports, EIS sections, and Section 106 documentation; and integration of tribal perspectives into cultural resource evaluations and environmental analyses. Tribal consultation is carried out through designated tribal liaisons and adheres to federal and state consultation requirements, trust responsibilities, and principles of early and meaningful engagement.

Consultation with tribes will continue through project permitting, design development, construction, and mitigation-related activities. Future coordination activities will include continued government-to-government engagement to ensure that tribal input informs project decisions, resource protection mitigation commitments, and implementation actions.

Agency and tribal coordination is detailed in Appendix A, Agency and Tribal Coordination, of the Final SEIS.