Dear City of Portland,

The Interstate Bridge Replacement Program is excited to be nearing the release of the Draft Supplemental Environmental Impact Statement (SEIS). This will afford the public the opportunity to review and comment on the analysis of potential impacts and mitigations of the Modified Locally Preferred Alternative (LPA).

The city's resolution adopting the Modified LPA in July 2022 reflected the hard work of regional elected officials, as well as local jurisdictional leadership. Not everyone got exactly what they wanted in the Modified LPA, but all got what is needed: a path forward to a new bridge that will keep our region connected for a century to come. Between the eight jurisdictions endorsing the Modified LPA we received 175 conditions in total. In addition to your endorsement, the city attached 55 conditions. We provided a response to 45 of your conditions in prior correspondence. We have been coordinating with others in the region to address your ten remaining conditions related to greenhouse gas (GHG)/vehicle miles traveled (VMT)/transportation demand management (TDM) and highway shoulder design.

Attachment A outlines how the program is addressing your remaining conditions.

We will continue to work with City of Portland staff, as the program progresses, to ensure the implementation of the commitments made by the program in response to your conditions.

Thank you for participation in the Modified LPA endorsement and conditions process. I'd like to also thank you for your ongoing commitment to this regional effort to replace the bridge and keep the economy of the region strong.

Sincerely,

Greg Johnson

IBR Program Administrator

ATTACHMENT A

Agency Name	#	Condition	Response
City of Portland	1	The Program shall set Greenhouse gas (GHG) and Vehicle Miles Traveled (VMT) reduction targets to be achieved by the program's elements. These targets shall be proportionate to the current bridge's regional share of total trips taken - and VMT driven and GHGs emitted on those trips. The reduction factors for these targets will be derived from existing state, regional, and local targets for GHG and VMT reductions.	The program expects to achieve reductions in VMT per capita and GHG by providing high-quality multimodal options for drivers and implementation of demand management tools such as tolling. These anticipated reductions are documented in the NEPA EIS. These reductions support existing state, regional and local targets for GHG and VMT reductions.
City of Portland	2	The Program shall present a plan to reduce, consistent with state targets for the Portland Metropolitan Area, the vehicle miles traveled (VMT) and greenhouse gas (GHG) emissions produced by all components of the Program, including construction, operations, and forecasted increases in traffic, with demand reduction, local and regional mitigation, and carbon offsets on a year-by-year basis through 2050.	The IBR program anticipates contributing to the reduction of VMT and GHG compared to a No Build alternative. GHG reductions associated with the program are anticipated from: a mode shift to transit, an increase in active transportation, demand management resulting in a reduction in driving trips, and travel efficiencies from system management programs. The program will calculate the GHG and VMT differences from the program compared to the No Build condition in 2045 in the NEPA impact analysis. The program will also develop an estimate of GHG associated with construction. The program estimates reflect decreased VMT and GHG in 2045 with the program in place compared to the No Build. As land use planning, TOD, and other local programs promote pathways to further reduce vehicular use of the interstate for local travel, the program will, in cooperation with project partners, promote adaptive management approaches to further reduce GHG from transportation sources.

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City of Portland	3	The Program shall work to meet the targets through highway design, transportation demand management strategies (including equitably designed variable rate tolling), and the provision and expansion of high-quality alternatives to drive-alone trips.	The IBR program is designed to meet traffic performance and efficiency by providing a multi-modal program that includes variable rate tolling, high capacity transit, and improved active transportation facilities. The NEPA document provides an evaluation of the anticipated reduction in VMT and GHG associated with the program and outlines Transportation Demand Management strategies planned by the program. The OTC and WSTC will lead policy decisions regarding IBR tolling including exemptions or discounts. The IBR program has studied tolling scenarios that include low-income discounts for consideration by the Washington and Oregon Transportation Commissions. Both commissions have supported the consideration of low-income toll programs on other toll projects and will work together to determine how to approach this on IBR.
City of Portland	4	As a part of the plan to meet the targets, the Program shall present modeled projections for GHG, VMT, VMT/capita, and modal splits for opening year, 2035, 2040, 2045, and 2050. Forecasted demand analysis will use best available methods, such as those currently in use in California and Colorado for latent/induced demand, unless and until the states, regions, and impacted local governments agree to other methodologies. Projections will be used to evaluate the planned demand management strategies and establish budgets for those and for future mitigation, as needed.	The IBR program will estimate the GHG, VMT, and modal splits for 2045 as part of the NEPA document. Opening year estimates may also be developed for comparison purposes in support of the Final EIS. The IBR team is using approved travel demand modeling tools approved by the USDOT and used in regional planning efforts and other NEPA evaluations in the region. The USDOT works with program staff and the regional MPOs to ensure traffic modeling is rigorous, appropriate, and defensible.
City of Portland	5	The State shall annually monitor and report on GHGs emitted and VMT produced by traffic in the BIA (state and local roadways), accounting for	The NEPA analysis shows the estimated change in GHG emissions with the program compared to the No Build

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		traffic diverted to the I-205 Columbia River crossing based on annual traffic counts of all motor vehicle types and annual fuel type utilization averages (traditional gas/diesel, electric, and other alternative fuels); such monitoring will take place through 2050.	condition in 2045. The evaluation considers the potential traffic diverted to the I-205 crossing. The GHG analysis uses projections for vehicle types, fuel mixes, and electricity grid sources based on current trends, policies, and regulations. Continued monitoring and progress toward state, regional, and local GHG goals will require on-going coordination and cooperation of multiple agencies. The states collect traffic count data at the bridge crossing and make those data available to the public and agency partners on an annual basis. TriMet and C-TRAN maintain ridership data that is publicly available and includes tracking of performance by individual routes.
City of Portland	6	Emissions and volumes above state and regional GHG and VMT reduction targets should be offset with mitigations that help insulate or benefit the communities impacted by the project. The Program shall demonstrate how it will support the proposed mitigation and offset measures through policy changes (e.g. expanded variable rate/VMT reduction/demand management tolling), funding for multimodal transportation expansion and use, technical assistance, or other forms of support. Mitigation adequacy will be determined by the extent to which GHG and VMT reduction targets are achieved. If they are not achieved in subsequent years, additional mitigation actions will be required that are likely to achieve the targets.	The IBR program is supportive of local and regional climate plans. The NEPA impact analysis shows the reduction in GHG and VMT from the program in the Portland Metro Region compared to the No Build in 2045; the project is accelerating progress to state, regional, and local goals. The IBR program does not anticipate additional mitigation to be needed.
City of Portland	7	The existing Climate Technical Working Group will be responsible for providing policy and technical direction for sections i)-iii) above. The Working Group (or a newly chartered Climate Implementation and Monitoring Group following	Continued monitoring and progress toward state, regional, and local GHG goals will require on-going coordination and cooperation with multiple agencies. The IBR program will continue

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		the completion of the program) should continue in operation until the Program's components have met VMT and GHG targets for at least five consecutive years, and if VMT or GHG exceeds targets in any subsequent year. At minimum, ODOT, Metro, City of Portland, City of Vancouver, TriMet, and C-TRAN staff should have membership in the group.	to work with these partners to develop tools, strategies, and policies to contribute to achieving state, regional, and local goals. After construction is complete, ODOT, WSDOT, TriMet and C-TRAN will work with Metro, RTC, City of Portland, and City of Vancouver to share traffic and transit data. The states collect traffic count data at the bridge crossing and make those data available to the public and agency partners on an annual basis. TriMet and C-TRAN maintain ridership data that is publicly available and includes tracking of performance by individual routes. The cities, Metro, and RTC could monitor land use changes that vary from the current plans, including changes in development patterns that generate VMT. Together, these data could be used by the cities and regional planning agencies to track performance. If reductions of VMT or GHG fall short of agency goals, the DOT, transit, and local agencies shall consider adaptive management approaches. The adaptive management approach will include measures available to each of the partner agencies.
City of Portland	9	Develop a construction management approach that includes appropriate requirements to reduce GHGs and carbon footprint during construction.	The IBR program is committed to implementing all reasonable construction practices that will contribute to reduced GHG. The NEPA document outlines the range of options and contractor requirements to meet these objectives.
City of Portland	32	The project shall strive to provide the minimum width for safe operations of the freeway and to	Program plans include inside and outside safety shoulders. The safety

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		address the needs for transit and emergency response use. The city strongly prefers a maximum of one full shoulder and one partial shoulder.	shoulders will only allow for buses to travel on the shoulder; as well as providing emergency, maintenance, and disabled vehicle access. The lane and safety shoulder widths are being designed to DOT standards.
City of Portland	33	The program and state DOTs shall commit to not use the highway bridge shoulder(s) to expand travel capacity temporarily or permanently by converting them into new travel lanes except during construction and maintenance; the Bus on Shoulder treatment is an agreed-upon use of the highway shoulder and is excepted.	Program plans include inside and outside safety shoulders. The safety shoulders will only allow for buses to travel on the shoulder; as well as providing emergency, maintenance, and disabled vehicle access. The lane and safety shoulder widths are being designed to DOT standards.