



To: Interstate Bridge Replacement Program
From: Just Crossing Alliance
Date: 6 November 2024
Re: Alliance Overview Comment on Draft Supplemental EIS

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

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

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

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

The need for more credible traffic modeling

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

underestimated.

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

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

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

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

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

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

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

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

Maximizing the potential of transit and active transportation

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

- The Light Rail configuration is sufficient for opening day of the bridge, but should be designed to accommodate the volume and frequency of service that will be required when the bottleneck at the Steel Bridge is eventually addressed with a transit tunnel under the Willamette River and downtown Portland, something we hope will occur before the 2045 horizon year of the DSEIS. Specifically, stations in the IBR project area should be dimensioned to support four-car trains.
- Beyond the horizon year we anticipate the need for higher capacity modes of transit (e.g., multi-lane BRT or heavy rail) to accommodate passenger movement demand. We should be considering now as we design the physical structure of the bridge how these might be put in place later in the service life of the structure.
- The multi-use path must be positioned adjacent to the transit way to allow seamless transfers between modes and to make the transit elevators available to path users. In this configuration transit would also serve to buffer path users from the noise, debris and other impacts of the auto lanes. The path should also be shaded to protect users in the much hotter summer months the DSEIS anticipates.
- Active transportation connections must be extended deeper into the community on both sides of the river, at least as far as Evergreen in downtown Vancouver and connecting to the popular Vancouver/Williams corridor in Portland.

Need for stronger pricing policy and tolling equity

An additional conclusion of the independent Marshall report was that even before constructing an IBR project current travel times could be reduced by a combination of better ramp metering and a corridor-wide pricing plan to manage demand including some form of the Regional Mobility Pricing Project previously proposed for the Oregon section of I-5. Such a policy would bolster transit demand, manage other bottlenecks in the corridor and decrease the need for additional auto lane capacity, helping right-size the project.

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

Health and Equity impacts

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

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

Transit benefits will flow disproportionately to white, non-Hispanic residents and the burdens of noise and tolls will be disproportionately borne by low-income and equity priority communities. We must do better.

Right-sizing the project

We believe the SDEIS analysis does not provide justification for a second auxiliary lane.

We also continue to believe that this project would be much more appropriate if it were simply a bridge replacement with transit and active transportation connections, rather than a five mile freeway expansion.