



To: Interstate Bridge Replacement Program
From: Bird Alliance of Oregon
Date: November 18, 2024
Re: Bird Alliance of Oregon's Comment on Draft Supplemental EIS

Bird Alliance of Oregon is a 501(c)(3) nonprofit conservation organization. We were founded in 1902. Our mission is to inspire all people to love and protect nature. Today we are one of the largest chapters of the National Audubon Society in the United States with over 45 staff, 600 active volunteers and 12,000 members. We work across the State of Oregon to protect native wildlife and the habitats on which they depend and to engage communities in conservation. Our activities include conservation policy, environmental education, running Oregon's busiest wildlife hospital and managing wildlife sanctuaries in Portland, at the Oregon Coast and on Mt. Hood.

Bird Alliance of Oregon focuses its conservation efforts in three primary areas:

- creating the greenest metropolitan area in the United States
- protecting birds across the landscape, and
- climate change mitigation and adaptation.

Bird Alliance of Oregon has long been recognized as a national and international leader in that arena of urban conservation. We work at multiple scales in the Portland Metropolitan Region to achieve our objectives including restoring and certifying urban and suburban habitat the backyard and neighborhood scale (over 13,000 properties currently enrolled in the program), green infrastructure and sustainable stormwater management, building the region's system of parks, trails and natural areas, and landscape scale, long-range land use planning.

While we appreciate the need for seismic resilience in this important interstate connection and are enthusiastic about the opportunity for transit and active transportation connections, we find that this project is not, as advertised, a bridge replacement but rather a five mile freeway widening that has significant impacts on destroying wildlife habitat, increasing emissions, and wasting valuable taxpayer resources.

Many of our allies in the Just Crossing Alliance have submitted detailed comments about various aspects of this project. This letter is intended as an overview summary to tie all of these together in five main themes:

- The need for more credible traffic modeling

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

The need for more credible traffic modeling

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

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

Maximizing the potential of transit and active transportation

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

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

Need for stronger pricing policy and tolling equity

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

Health and Equity impacts

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

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

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

Right-sizing the project

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

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

Micah Meskel
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