



November 14, 2024

Interstate Bridge Replacement Program
Attn: Draft SEIS Public Comment
500 Broadway, Suite 200
Vancouver, WA 98660

1000 Friends of Oregon continues to closely monitor and weigh in on the development of the Interstate Bridge Replacement Program, as a member of the Just Crossing Alliance. We appreciate the opportunity to comment on the Draft Supplemental Environmental Impact Statement. This project presents an immense opportunity for the future of sustainable transportation options through this corridor, however, that opportunity needs to be maximized while climate impacts need to be minimized to ensure a future-proof, climate-resilient Interstate Bridge.

The SEIS assumes we fail to meet climate targets to keep global warming below two degrees Celsius. If that's the future the state is planning for, then the bridge would need to be designed to withstand regular temperatures above 100-105 degrees Fahrenheit. Despite the assumption that we won't meet climate goals, the SEIS fails to acknowledge the impact of induced demand on greenhouse gas emissions (GHG). It upholds the false belief that reducing congestion will reduce GHG emissions, yet multiple studies have shown that adding vehicle capacity encourages more people to use the roadway, therefore increasing use and GHG emissions. Additionally, by making it more efficient for people to drive long distances, they're more likely to be comfortable commuting farther. Interstates were built largely for the benefit of suburban commuters, so by widening them it will be reinforcing land use patterns that support longer commutes that contribute to increased Vehicle Miles Traveled (VMT). The IBRP should limit the construction of additional personal vehicle travel lanes to the greatest extent possible to mitigate climate and land use impacts.

Rather than planning for a future that locks us into auto-dependency, the IBRP should plan for a transit- and active transportation-oriented future. Regional goals call for reductions in GHG emissions and VMT, but that requires building the infrastructure needed to support those goals. One way this project could better support transportation options would be to relocate the active transportation multi-use path and the dedicated transit lanes to the same side of the new structure. Active transportation users and transit riders should easily be able to transfer from one mode to another. Locating transit between the multi-use path and regular vehicle traffic lanes would also allow for a buffer between active transportation users and vehicle noise pollution and road debris. The multi-use path should have some sort of shade coverage to protect users during the expected extreme weather events. The height and design of the bridge should also account for the slope of the incline that active transportation users will have to climb. In hot weather, steep inclines could cause extreme health risks, and in icy weather they could cause extreme safety

risks. Lastly, multi-use path connections need to be better integrated into the existing bike and pedestrian networks in both Vancouver and Portland to increase likelihood and ease of use.

In addition to the active transportation improvements, one of the most exciting parts about this project is the improved transit connections between Portland and Vancouver. That being said, the SEIS currently anticipates some transit routes to take even longer than they currently do. To encourage more drivers to switch to riding transit, it needs to be comparably fast and frequent. If we're increasing transit connectivity, then it should improve the experience compared to the present day. Traffic modeling expects the I-5 Rose Quarter expansion to have also been built, but there will instead then be a bottleneck at I-405, therefore slowing down buses, especially in comparison to light rail. Studies and projects across the country have repeatedly shown that adding more lanes is not a permanent solution to alleviating congestion. Instead, efforts should be focused on reducing drive-alone trips because otherwise there will always be a new bottleneck to address.

Additionally, transit stations should be designed to accommodate four-car trains. The Regional Transportation Plan calls for a tunnel under the Willamette River to address the Steel Bridge capacity limits in Portland. When the tunnel is built, then four-car trains will be possible through the city center. The IBRP will serve transit riders for generations to come, so it must meet the needs of a growing ridership. It would be much more affordable and efficient to properly construct stations now, rather than having to redo them later. By improving public and active transportation options, the region can reduce GHG emissions and VMT, and improve the experience of the approximately 1 in 3 Americans who are unable to drive.

With the primary source of GHG emissions for this project coming from the traffic on the bridge and the primary purpose of this project being to increase seismic resiliency, the scope of the IBRP should be reduced. Many of the costs and negative impacts associated with this project would be reduced or eliminated if it were a simple bridge replacement with public and active transportation improvements. Instead, it also includes several miles of freeway expansion on either side of the bridge, as well as the rebuilding of seven interchanges. There should be a separate SEIS that looks at the impacts of the current Modified Locally Preferred Alternative and a scenario that's just the bridge replacement and public and active transportation improvements. Since we know the IBRP and the I-5 Rose Quarter Improvement Project will still not fully address the regional bottlenecks through the use of additional lanes, the state should instead double-down on mode shift efforts rather than more car lanes.

Thank you for your consideration.

Sincerely,

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