



PLACE INITIATIVE

Proactive Leadership Advocating for Climate & Equity

November 16, 2024

To whom it may concern,

PLACE Initiative is a national nonprofit that works to provide solutions to the climate and social justice crises using place-based, community-driven programs centered around responsible land use planning to prevent urban sprawl and combat systemic inequities. Comprised of planners, geographers, designers, and climate adaptation professionals, we at PI know that the built environment cannot be ignored within the discussion of climate change, and we envision a world where conservation of open space, efficient use of natural resources, and reduction of carbon emissions are as important to the planning of cities and towns as is fiscal growth.

In our analysis of why transit, bicycle, and pedestrian projects appear to be stalled across Oregon, the preliminary findings are that most of the available money (as a percentage of total transportation spending impacting the state) and bandwidth (in terms of state and regional planning capacity) is being diverted to freeway expansion projects, including the Interstate Bridge Replacement (IBR) project. If these were big, transformational investment projects that would usher in a brighter future for residents, that would be one thing. However, multiple independent analyses indicate that all of these freeway expansion projects are unnecessary, and largely are a complete waste of taxpayer dollars, committed without an adequate examination of the opportunity costs of not using those same dollars to instead expand bicycle, pedestrian, and transit infrastructure across the state (and across state lines).

For instance, the Just Crossing Alliance (JCA) has released (available at: <https://justcrossing.org/2024/10/23/independent-traffic-modeling-analysis-garbage-in-garbage-out/>) an independent assessment of IBR traffic modeling, conducted by our colleague, national transportation modeling expert Norman Marshall, president of Smart Mobility. Mr. Marshall specializes in analyzing the relationships between the built environment and travel behavior, and doing planning that coordinates multi-modal transportation with land use and community needs. A key finding of the report is that the Draft Supplement Environmental Impact Statement (DSEIS) forecasts more traffic in the corridor in the no-build scenario than is physically possible (a similar error in the CRC EIS has been confirmed by historical data). JCA members reacted to the information noting that if the no-build forecast is invalid, then all the environmental analysis in the DSEIS is without basis! Other conclusions of the Marshall report include that:

- The Interstate bridge is not the I-5 bottleneck in either direction
- Widening the bridge would do nothing to improve I-5 congestion, and could make it worse, because expanded bridge capacity will funnel even more traffic into the actual, unresolved bottlenecks.
- Congestion to the south “meters” traffic on the bridge during peak periods, and traffic cannot grow without road expansion to the south
- Metro’s regional Kate model, relied on in the DSEIS, significantly overestimates peak period traffic today, and forecasts impossible traffic growth in the future

- The DSEIS modeling is useless for understanding future traffic conditions because it overstates future traffic growth and fails to account for capacity limitations.
- This impossible traffic growth forecast is the basis for the DSEIS traffic metrics, i.e., garbage in – garbage out
- Higher speed AND higher throughput are possible, without expansion, through better ramp metering, and/or system-wide tolling
- Implementing system-wide tolling on I-5 would actually address the I-5 congestion that the IBR project falsely claims to address. ODOT's Regional Mobility Pricing Project analysis (September 11, 2023) found that system-wide tolling would improve speeds, and increase throughput.
- Transit investments could help address I-5 congestion, but the SDEIS models are not reliable in evaluating transit alternatives.

The JCA has also released an "Active Transportation and Transit Vision" report (<https://justcrossing.org/wp-content/uploads/2024/11/Just-Crossing-Alliance-Active-Transportation-Vision.pdf>), which further suggests that:

- "The Climate section of the DSEIS makes it clear that ambient temperatures around the bridge will frequently exceed 100°F in summer months. Factoring in heat island effects, this will make the active transportation path unusable unless the multi-use path is shaded. Shading with plantings could additionally act as "the lungs of the bridge" helping with air quality." We would concur, and suggest trees be planted on both sides of the multi-use path, so it is shaded in both morning and afternoon hours. The tree root structures on the bridge could also be used to help absorb bridge runoff and pre-treat it before it leaves the bridge structure.
- "On the Washington side, the multi-use path stops at the waterfront. This does not match the need and leaves us with a challenging spiral path ascending/descending more than 100 feet. It also puts travelers from northern parts of Vancouver in the challenging position of traveling downhill through the city, then having to gain that elevation back on the ramp system. The Active Transportation Working Group has identified this as "the Vancouver dip." Instead, the multi-use path should continue north, at least to the "community connector" at Evergreen and most appropriately to the northern extent of the project area." This lack of attention to the details of how non-auto users might interact with the new structures is indicative of a lack of professional competency amongst the bridge team, amongst their myopic focus on constructing new facilities for cars, at all costs. Shame on the project team.
- "On the Oregon side, while the connection to the Kenton neighborhood appears reasonably robust, the connections to the MLK corridor area will leave active transportation users in no-man's land. Securing a complete, safe and comfortable connection to the popular Vancouver/Williams corridor is a priority. The Active Transportation Working Group has also identified a lack of connections to the 40-mile loop and we look forward to additional detailed connectivity suggestions in their comments." We concur completely. A project of this size must result in net benefits for all; ignoring important connections for bicycles and pedestrians is just further proof of the incompetency of all involved with the state DOTs running this project.

In a separate comment letter, the JCA further recommends (<https://justcrossing.org/wp-content/uploads/2024/11/JCA-Overview-DSEIS-Comment-Letter.pdf>) that:

- “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.” We concur.
- “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.” We concur.
- “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.” We concur. This project will perpetuate inequitable outcomes, doubling down on a history of inequity in this region that is rooted in white supremacy. There is no reasonable justification for such a project.

We have grave concerns about how much of this project is related to widening the freeway and its approach structures and ramps on the Washington side of the river; we would much prefer to see the scope of this project limited to the bridge itself, and not include these other freeway-widening elements that have contributed to more than a doubling in costs to replace the bridge. We still believe that the Common Sense Crossing approach, of retrofitting the existing bridge, then building a new, parallel span just for light rail, bikes, pedestrians, and local access traffic to and from Hayden Island, would result in an overall lower-cost project and, in combination with tolls and pricing, could deliver more congestion relief benefits for less cost. We continue to object to the obscenely large price tag of this un-needed bridge mega-project. We concur with the JCA’s, who find that “this project is not, as advertised, a bridge replacement but rather a five mile freeway widening.”

We therefore recommend that this project be shelved for the foreseeable future. Instead, we recommend that the relevant transportation agencies coordinate to undertake the following actions:

- Undertake work to drill new pilings and retrofit the existing bridges so they could withstand a major earthquake
- Implement variable-rate pricing in the corridor for the purpose of managing congestion
- Use toll proceeds to pay for the construction of a new, local-access-only bridge that supports light rail, bicycles, and pedestrians, connecting from Vancouver to Hayden Island, and another bridge with a similar cross-section from Hayden Island on into Portland

- Also use toll proceeds to increase transit frequencies on the Amtrak Cascades line, including new commuter rail service from Vancouver into Portland, with trains running at least once every 15 minutes during peak hours
- Use toll proceeds to purchase the railroad ROW from Seattle to Portland, allowing for the ROW to be electrified, to add tracks, and to manage rail operations to balance new high-frequency rail commuter operations with freight rail movements
- Use toll proceeds to construct new bicycle paths connecting to and from the bridge at Vancouver, Hayden Island, and Oregon.

Then, once these actions are complete, it could be possible that the time will be right in 2045 or 2050 to resume work on this bridge replacement project, if further analysis at that time continues to show a need for a new facility.

Until that time, this project should be canceled, and all employees who worked on it should be let go and given the freedom to seek other employment opportunities. There have been sufficient professional mistakes made on this project that nobody who worked on it, and did not object strenuously, should be ever allowed to work on a similar transportation project or for a transportation agency again.

Sincerely yours,



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