

## Connor Ayers

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**Subject:** RE: [External sender]Agenda Item 5.1 Oct. 21, 2021 JPACT meeting

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**From:** Doug Allen [<mailto:DougAllen@centurylink.net>]

**Sent:** Wednesday, October 20, 2021 11:46 AM

**To:** Legislative Coordinator

**Subject:** [External sender]Agenda Item 5.1 Oct. 21, 2021 JPACT meeting

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JPACT Representatives:

As you move through the process of considering an MTIP amendment for funding the Interstate Bridge Replacement Program (IBRP), please evaluate whether the project is on course to meet regional values as it moves forward. It appears that IBRP staff are taking shortcuts that will shortchange an adequate consideration of climate and equity during development of alternatives.

Rather than consider reasonable alternatives that have been brought to them by interested residents, they are adamant that they will only consider alternatives that they or the prior Columbia River Crossing (CRC) have invented. This is despite the fact that reasonable alternatives exist that not only meet the stated "Purpose and Need" of the project, but offer the possibility of reduced environmental impact and significantly cheaper life-cycle cost.

As a Director of AORTA - Association of Oregon Rail and Transit Advocates, it was brought to my attention by our members that the IBRP staff are refusing to give any consideration to the well-known "Common Sense Alternative II" (CSA-II) proposal, which was similarly rejected during the CRC process. Not only have they refused, they have presented incorrect and misleading information about the CSA-II to the Executive Steering Group (ESG) of the IBRP.

I sent a rebuttal to the ESG, explaining the multiple points where the IBRP material was factually incorrect, including references to CRC documents on the Washington DOT website that validate my position. I have attached a copy of that rebuttal to this email. Within the rebuttal are Internet links to a full explanation of the CSA-II and Internet links to the mistaken IBRP materials as they reside on the IBRP web site.

I have also attached the reply of Mr. Greg Johnson, IBRP Program Administrator. Note that he completely ignores the contents of my rebuttal, and instead refers, circularly, to the same IBRP material that I have rebutted. Even though the CSA-II objectively meets the "Purpose and Need" of the IBRP, Mr. Johnson's reply simply repeats his claim that it does not.

This sort of response to public involvement is unacceptable. Process does count. We have NEPA at the federal level, Goal 1 of Oregon's Statewide Land Use Planning Goals (Public Involvement) among multiple Oregon requirements, and we have local government review, of which you are an important part.

I am aware of how complex these issues are, which is why it is important for you to become as knowledgeable as possible about the IBRP and help steer this process in a responsible and environmentally positive direction. Simply because a concept is in the current Regional Transportation Plan does not mean that the process for implementing that concept is moving forward in an acceptable manner. MTIP amendments are not automatic for a reason. You and the Metro Council both have an obligation to review whether the IBRP is on course. The Oregon Legislature may have set this current process in motion, but it is still happening within the existing framework of federal, state, and local cooperative planning.

Sincerely,  
Doug Allen  
Douglas R. Allen  
734 SE 47th Ave.  
Portland, OR 97215

From: "Greg Johnson" <Greg.Johnson@interstatebridge.org>  
Date: Thursday, October 7, 2021 5:03 PM  
To: Doug Allen  
Subject: IBR Response to D. Allen email dated 9/22/21: Rebuttal of IBRP presentation to ESG

Dear Mr. Allen,

Thank you for your recent comments to some of the Executive Steering Group members regarding the program memo about options that do not meet Purpose and Need. Your comments were forwarded to the program for review and a response.

The IBR program completed a thorough review of the CSA II and presented the findings of the analysis at the September Executive Steering Group and Community Advisory Group meetings. The CSA II does not meet the Purpose and Need and is technically infeasible and incomplete. More details about the technical findings can be found in the [Screening and Evaluation of the "Common Sense Alternative II" memorandum](#).

In 2004, the Columbia River Crossing (CRC) project was formed by the Washington and Oregon Departments of Transportation to address I-5 corridor transportation issues identified by regional leaders through long-range planning studies. The intent of this project was to improve safety, reduce congestion, and increase mobility of motorists, freight traffic, transit riders, bicyclists, and pedestrians.

In the summer of 2008 a Locally Preferred Alternative (LPA) was selected. In 2011, a Final Environmental Impact Statement (EIS) was published, and a project Record of Decision (ROD) was issued by the Federal Highway Administration (FHWA) and Federal Transit Administration (FTA). After the ROD was published, the LPA was refined to include a phasing plan and to comply with the U.S. Coast Guard's issued bridge permit. In 2013, FHWA and FTA approved two NEPA re-evaluations that formally amended the LPA.

The previous project's Record of Decision from the prior NEPA process, which includes a replacement bridge, high capacity transit and improvements to five interchanges, is still valid. However, many changes to the physical, environment, regulatory context, local jurisdiction and community priorities have shifted since 2013.

The IBR program will be analyzing a replacement bridge solution that incorporates design options to address these changes since the previous planning effort. The program believes that this approach to identify new design options for the IBR solution that address changes that have occurred, while incorporating actionable commitments to climate and equity, is the most effective way to keep the program moving forward and address the shared interests of the program, agency partners, and the community.

Sincerely,

Greg Johnson  
Interstate Bridge Replacement Program  
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TO: IBRP Executive Steering Group  
FROM: James Howell and Douglas R. Allen, AORTA Directors  
DATE: September 22, 2021

SUBJECT: Rebuttal of Sept. 15 presentation to ESG regarding Common Sense Alternative II (CSA-II)

This memo rebuts the material presented at the Sept. 15, 2021 IBRP Executive Steering Group (ESG) meeting, which comprised a cover memo<sup>1</sup>, a specific memo<sup>2</sup> about the CSA-II, and a slide presentation<sup>3</sup>.

To set the context for this rebuttal, we highlight the following declarations of the IBRP team (see pages 11-14 of slide presentation):

**Purpose and Need:**

An alternative must address the transportation needs of the I-5 corridor/bridge:

- Growing travel demand and congestion
- Impaired freight movement
- Limited public transportation operation, connectivity, and reliability
- Safety and vulnerability to incidents
- Substandard bicycle and pedestrian facilities
- Seismic vulnerability of the I-5 bridge

**Key IBRP "findings":**

**Common Sense Alternative II**

- Would not address safety and congestion in the I-5 corridor
- Transit, bikes, pedestrians, and local traffic would remain on existing bridge
- Bridge lifts would continue at the Interstate Bridge
- Seismic vulnerability would remain for the Interstate Bridge

This rebuttal memo assesses compliance with the Purpose and Need statement by comparison with the no-build option, but will use the "Locally Preferred Alternative" (LPA) selected by the prior CRC process for comparison where appropriate. We assume that the IBRP memos referenced above are making similar comparisons, although that is unclear.

**What is the essence of the Common Sense Alternative II (CSA-II)?**

(See <https://www.youtube.com/watch?v=gV0W5ApNiSo> for full narrated explanation.)

The primary component is a new 8-lane freeway bridge for I-5, replacing the I-5 motor vehicle travel functions of the existing Interstate Bridges. This is not a "supplemental" bridge, but is the primary constructed feature of the CSA-II. It would be located immediately upstream of the existing bridges, have a 72-foot river clearance at the highest point, in-line and with river clearance identical to the existing Interstate Bridges,

and would have a bascule opening span in line with the lift spans of the existing Interstate Bridges.

This new bridge would be built to current seismic standards, eliminating the risk of traffic disruption resulting from the most massive earthquake for which current design standards have been set.

The new bridge would have three standard freeway through lanes in each direction, plus a supplemental outside lane in each direction to reduce congestion caused by entering and exiting traffic in the vicinity of the bridge.

Another important component of the CSA-II eliminates the need for bridge lifts for commodity barge traffic. Currently, despite the 72-foot river clearance in the middle of the existing bridges, under which all commodity barge tows can fit, the opening in the downstream BNSF Railway bridge does not line up with that high point, so a significant amount of barge traffic requires the existing Interstate Bridges to be opened to allow for a safer direct path, especially in higher water conditions. To solve this problem, the CSA-II includes a new lift span on the BNSF Railway bridge.

Neither of these components is novel or un-vetted by experts. Well before the prior CRC process began, in order to reduce bridge lifts on I-5, the Columbia River Towboat Association and the business group Identity Clark County proposed installing a new lift span on the BNSF Railway bridge to line up with the high spans of the existing Interstate Bridges. This concept was vetted by the US Coast Guard, which declared the existing railroad swing span a hazard to navigation, and which has the authority to compel cooperation by the BNSF Railway in ameliorating the problem. In 1989, a swing span over the Willamette River (known as Bridge 5.1), on the same rail route, was replaced with a lift span, improving navigation as well as rail operation.

Also, during the CRC process, the Metro Council adopted a resolution asking the CRC to analyze options that included fixing the BNSF Railway bridge, but the resolution was ignored by CRC staff.

The other main component of the CSA-II is retention of the existing Interstate Bridges for local traffic, pedestrians, bicycles, and transit.

Note that with the CSA-II, bridge lifts would be minimal, and not occur during peak times. River traffic exceeding the 72-foot clearance occurs on rare occasions, and can be scheduled. Likewise, maintenance lifts can also be scheduled outside peak times. A new opening span on an Interstate highway has a clear precedent in the Woodrow Wilson bridge on I-95 (Capital Beltway) over the Potomac River.

Given this description of the CSA-II, it is disturbing that the IBRP team claims that the CSA-II "would not address safety and congestion in the I-5 corridor."

The following list of issues points out several places where the IBRP material has gone wrong in its attempt to discredit the CSA-II:

1. Bridge lifts do not violate the Purpose and Need Statement, per se. Safety, vulnerability to incidents, and impairment of freight movement can be addressed by multiple components of a project, including a reduction in bridge lifts from the current frequency. This was made explicit during the CRC process from which the current Purpose and Need Statement has been continued without change.

2. The lifecycle costs of maintaining the existing Interstate Bridges are unknown. Speculative claims, without analysis, don't help.

3. The CSA-II provides complete seismic safety for I-5 through construction of a new bridge. This new bridge could provide temporary transit, pedestrian, bicycle, and local traffic connections if needed after a seismic event. The wisdom of any seismic upgrades to the existing Interstate Bridges should be based on a competent economic analysis.

4. Land use - The footprint of the CSA-II is likely much smaller than the LPA.

5. Construction costs are not part of the Purpose and Need statement, and should be based on competent analysis of a comprehensive solution, not fragmentary speculation about the cost of individual components.

6. Natural Resources - The effect on natural resources is determined through an Environmental Impact Statement (EIS) or Supplemental Environmental Impact Statement (SEIS) governed by the National Environmental Policy Act (NEPA) and associated regulations. Given that any bridge piers in the CSA-II will be in alignment with the existing Interstate Bridge piers, the environmental significance of these, especially beyond the construction phase, will require competent analysis, not speculation. Neither the CSA-II nor the CRC option (RC-8) that the IBRP team seems to conflate with the CSA-II were analyzed in the EIS for the CRC.

7. While marine navigation is not part of the Purpose and Need, the CSA-II, as described above, significantly improves marine navigation and removes an identified hazard. In discussing the issue of replacing the railroad swing span, much of the IBRP team memo is simply a distraction from the basic question of whether the CSA-II meets the Purpose and Need statement. It makes the obvious statement that the rest of the BNSF Railway bridge may be seismically vulnerable. This fact is deserving of analysis, such as whether public investment in one component of that bridge makes economic sense or could help prevent the environmental disaster of a fuel barge crashing into one side of the narrow swing span channel. Blanket dismissal seems irresponsible, yet the memo argues that the Oregon and Washington Departments of Transportation might not want to pay for fixing the railroad bridge, and appears to argue for maintaining the existing hazardous narrow swing span channel on the railroad bridge.

8. The IBRP team material incorrectly represents the new I-5 freeway bridge component of the CSA-II. It is not a "supplemental" bridge, but is the actual I-5 crossing between Hayden Island and Vancouver, built to full Interstate Highway standards, with four lanes in each direction. It would carry C-Tran express buses, but not light rail or a bus connection to a light rail terminus on Hayden Island. In its discussion of re-purposing the existing Interstate Bridges, the IBRP team references arguments from CRC documents that assume continued use of the old bridges for I-5 traffic. That concept is not part of the CSA-II.

9. The IBRP team memo conflates the "RC-8" river crossing option from the prior CRC, with the new CSA-II bridge, yet suggests that it does not meet the project Purpose and Need, even though RC-8 was identified as meeting the Purpose and Need of the CRC, which is the same Purpose and Need Statement adopted by the IBRP.

Pages 3 and 4 of the specific memo<sup>2</sup> gloss over what happened in the CRC "Step A Screening" process. This memo implies that RC-8 is essentially the same as the new I-5 bridge proposed in the CSA-II. Later, on pages 6 and 7, the memo admits that RC-8 passed the Step A Screening process, meaning that it met the Purpose and Need of the project. The relevant CRC document declares: "Staff Recommendation: Advance RC-7 through RC-9".

See page 3-4 of

[https://wsdot.wa.gov/accountability/ssb5806/docs/6\\_Project\\_Development/Alternative\\_Development/StepAScreening.pdf](https://wsdot.wa.gov/accountability/ssb5806/docs/6_Project_Development/Alternative_Development/StepAScreening.pdf)

Also see

[https://wsdot.wa.gov/accountability/ssb5806/docs/6\\_Project\\_Development/Alternative\\_Development/AdditionalComponentScreening.pdf](https://wsdot.wa.gov/accountability/ssb5806/docs/6_Project_Development/Alternative_Development/AdditionalComponentScreening.pdf)

During the CRC process, RC-8 inexplicably received scores of "unknown" for the question of whether it improved safety and vulnerability to incidents, and the question of whether it reduced the seismic risk of the I-5 Columbia River Crossing. Perhaps this is because RC-8 was understood to be a "supplemental" bridge, carrying only one direction of I-5. The CSA-II full I-5 new bridge obviously improves safety and reduces seismic risk of the I-5 crossing.

In any case, subsequent to the CRC Step A Screening process, CRC staff decided to jettison all movable-span options. By citing the "unknown" scores, and then comparing movable-span options to fixed-span options rather than to the "no-build" option, staff presented the no-brainer fact that a fixed span would have less impact from bridge openings than a movable span, however infrequent and off-peak those openings might be. They also claimed that all movable spans increase risk to marine navigation. This claim depends on their refusal to consider ameliorating the swing span on the BNSF Railway bridge. This information was presented by the CRC staff as conclusions, and supporting analysis has not been supplied.

Therefore, by fiat, CRC staff removed RC-8 after it passed the Step A Screening process, and before the Step B Screening process was undertaken. Given the significant differences between the CSA-II proposal for a new I-5 freeway bridge, and the previously

rejected RC-8, there is all the more reason to conduct an analysis of the CSA-II proposal under a NEPA SEIS or new EIS

Furthermore, RC-8 was designed with a 65-foot river clearance, seven feet lower than the existing Interstate Bridges, biasing the CRC analysis that RC-8 failed to reduce bridge lifts enough.

10. By eliminating a full Hayden Island Interchange, the CSA-II eliminates at least 6 lanes of roadway width and millions of dollars in construction cost, occupying far less total land on Hayden Island than the LPA. How is this accomplished? By re-using the existing Interstate Bridges for local traffic, in combination with a supplemental Portland Harbor Bridge for LRT and local traffic (as included in the CRC LPA). The IBRP team's statement that "...it is reasonable to assume that reuse alternatives generally consume considerably more land compared to replacement options..." is demonstrably false in the case of the CSA-II proposal.

11. The IBRP memo conclusions regarding re-use of the existing spans are mostly speculative, and misrepresent the CSA-II proposal. The IBRP memo states that "...any alternative that does not address the seismic deficiencies of the existing Interstate Bridge would not meet the program's Purpose and Need statement." This ignores the fact that the CSA-II does not use the existing Interstate Bridges for I-5. The new I-5 bridge envisioned in the CSA-II meets the requirement in the Purpose and Need Statement that "seismic vulnerability of the I-5 bridge" be addressed.

Also, notably, at the DEIS phase of the CRC, two options that re-used the existing Interstate Bridges for northbound I-5 traffic only, were included for analysis. These options included seismic upgrades to the existing bridges.

The CSA-II is agnostic regarding the economic value in retrofitting the existing Interstate Bridges, given that the new I-5 bridge would ensure transportation connectivity in the event of a major earthquake. Still, the memo's un-referenced claim that "Subsequent evaluations of seismic retrofitting have determined that seismic retrofits would be prohibitively expensive..." is suspect and speculative, given the previously published analysis of seismic retrofitting developed by the CRC. No analysis has been done regarding the actual extent of retrofitting that would make economic sense for the existing Interstate Bridges, given their re-purposing so they no longer carry I-5 traffic.

12. In doing a cost-benefit analysis, which we must point out is not a factor in meeting the requirements of the Purpose and Need statement, any life-cycle costs of retaining the existing Interstate Bridges must be weighed against both the demonstrable cost savings of the CSA-II compared with the LPA, as well as the intangible benefits of the CSA-II compared with the LPA.

13. The much lower profile of the CSA-II I-5 freeway bridge, as compared with the LPA, has huge benefits. On the Washington shore, for the high LPA bridge, the controlling



factor is the height of the BNSF Railway that runs parallel to the north shore of the Columbia. The existing I-5 lanes travel under the BNSF Railway, as they would also do under the CSA-II. Given that the railroad is on fill perhaps 20 feet above ground level, then adding the necessary 24 feet of clearance above the railroad, then perhaps 20 feet for the lower deck of the LPA (the CSA-II main I-5 bridge is a single deck), means that the LPA soars past downtown Vancouver at the height of a six-story building. The CSA-II would be at ground level, the same as the existing I-5, past downtown. Certainly the railroad is not going to be moved under any circumstances.

Despite this significant difference between the CSA-II river crossing and the LPA, the IBRP memo appears to rely on a CRC analysis of shore-side impacts on the Vancouver side of the river, that if applied to the CSA-II, is demonstrably false:

*"One of the potential concerns when comparing river crossing options is that the higher elevation options could potentially have more significant impacts at the onshore bridge approaches in Vancouver and on Hayden Island when compared to lower elevation, moveable span options. However, the design development of the low- and mid-level options has resulted in a relatively minor difference of elevation of about 15 feet at mid-span (as noted above, the low-level bridge would be at about 80 ft above the water, and the mid-level span would be at about a 95 ft. elevation). The difference in elevation would generally be progressively less as you move away from the river, resulting in relatively minor differences in elevation at the Vancouver and Hayden Island approaches. As a result, the potential on-shore impacts can be viewed as approximately equivalent for the low and mid-level options."* See page 3 of

[https://wsdot.wa.gov/accountability/ssb5806/docs/6\\_Project\\_Development/Alternative\\_Development/AdditionalComponentScreening.pdf](https://wsdot.wa.gov/accountability/ssb5806/docs/6_Project_Development/Alternative_Development/AdditionalComponentScreening.pdf)

While the CRC analysis concedes a potential advantage in having a movable span, it dismisses that advantage by stating that as a result of their "...design development..." "...the potential on-shore impacts can be viewed as approximately equivalent for the low [movable-span] and mid-level [fixed-span] options."

Let us be clear here: The CRC did not study the CSA-II option of a new I-5 bridge, but instead studied a range of "supplemental" bridges that would have carried only one direction of I-5, retaining the existing Interstate Bridges for the other direction. In no way would the CSA-II have on-shore impacts that are "approximately equivalent" to that of the CRC LPA, as shown above. What the CRC studies did clearly show was that a new upstream bridge with a movable span could be a component in meeting the Purpose and Need of the project.

14. The August 31 memo<sup>1</sup> from the IBRP team entitled "CONTEXT FOR REVIEW OF SOLUTIONS THAT DO NOT MEET THE PURPOSE AND NEED FOR AN INTERSTATE-5 REPLACEMENT [sic] BRIDGE" begins with this assertion: "When restarting the Interstate Bridge replacement work in 2019, there was clear direction from the governors of Oregon and Washington as well as the bi-state legislative committee that the program should utilize past work from the previous project **that remains valid**

[emphasis added] to maximize past investment and ensure efficient decision-making, while also taking into consideration changes since the previous planning effort."

15. The memo<sup>2</sup> specific to the CSA-II states: "The evaluation conducted under CRC of the group of components comprising the CSA II is still valid. The needs for the program have not changed, and the CSA II would not meet the program's Purpose and Need statement."

This is false. The CRC never conducted a valid evaluation of either all individual components of the CSA-II, or the functional grouping of components that the CSA-II comprises. Furthermore, the CSA-II demonstrably does meet the IBRP Purpose and Need statement.

16. The CRC LPA was a design failure: Too high past downtown Vancouver, too low over the Columbia River, too wide over Hayden Island, excessively steep for bicycles, pedestrians, and light rail, and too expensive. The current IBRP plans are based on past failure, and stubbornly sticking to that past failure seems like a recipe for future failure.

The CSA-II demonstrates that there are remedies for many of the problems of the LPA. If the IBRP team would consider an alternative based on the CSA-II components, and engage in a good-faith analysis and refinement, they might well achieve the sort of affordable success that this region is hoping for.

Footnotes:

1. Cover Memo:

[https://www.interstatebridge.org/media/kqzlbxzb/solutions-cover-memo\\_remediated.pdf](https://www.interstatebridge.org/media/kqzlbxzb/solutions-cover-memo_remediated.pdf)

2. Memo specific to CSA-II:

[https://www.interstatebridge.org/media/qxwnqcnz/memo-csaii\\_remediated.pdf](https://www.interstatebridge.org/media/qxwnqcnz/memo-csaii_remediated.pdf)

3. Slide presentation shown at Sept. 15, 2021 ESG meeting:

[https://www.interstatebridge.org/media/5fkgfbkb/ibr-esg-presentation-9-15-21\\_remediated.pdf](https://www.interstatebridge.org/media/5fkgfbkb/ibr-esg-presentation-9-15-21_remediated.pdf)