



## JUST CROSSING ALLIANCE

Date: June 10, 2022

To: Bi-State Interstate Bridge Legislative Committee  
Metro Council  
SW Washington Regional Transportation Council  
Portland City Council  
Vancouver City Council  
TriMet Board of Directors  
C-TRAN Board of Directors  
Port of Portland Board of Commissioners  
Port of Vancouver Board of Commissioners

From: Julia DeGraw, Coalition Director, Oregon League of Conservation Voters  
Huy Ong, Executive Director, OPAL  
Dan Bilka, President, All Aboard Northwest  
Michael Andersen, Transportation Lead, Sightline Institute  
Paulo Nunes-Ueno, Transportation and Land Use Lead,  
Front and Centered  
Art Poole, President, AORTA  
Nick Caleb, Climate and Energy Attorney, Breach Collective  
Brett Morgan, Transportation and Metro Policy Manager,  
1000 Friends of Oregon  
Mary Peveto, Executive Director, Neighbors for Clean Air  
Ukiah Halloran-Steiner, Co-lead, Sunrise Rural Oregon  
Adah Crandall, Campaign Lead, Sunrise PDX  
Vivian Satterfield, Director of Strategic Partnerships, Verde  
Heidi Cody & Cathryn Chudy,  
Alliance for Community Engagement SW WA (ACE)  
Monica Zazueta, Sunrise SW WA  
Kiel Johnson, Chair, BikeLoud PDX

Sara Wright, Transportation Program Director,  
Oregon Environmental Council  
Claire Vlach, Plans and Projects Committee, Oregon Walks  
Michelle DuBarry, Families for Safe Streets  
Dan Frye, Steering Committee, Metro Climate Action Team  
Sarah Iannarone, Executive Director, The Street Trust  
Abby Griffith, Disability Mobility Initiative  
Bob Sallinger, Conservation Director, Portland Audubon  
Joe Cortright, Director, City Observatory  
Debra Higbee-Sudyka, Conservation Committee Chair,  
Oregon Chapter Sierra Club  
Aaron Brown, Co-founder, No More Freeways  
Stephanie Noll, Coalition Director, Oregon Trails Coalition  
Doug Allen, PDX Forward

Re: Significant adjustment of Interstate Bridge Replacement Project is necessary before Environmental Review

The Just Crossing Alliance is committed to ensuring that the IBR project outcomes are centered in Environmental Justice, Social Justice, Climate Justice and Environmental Health. Our assessment is that if the current Modified Locally Preferred Alternative is advanced into Environmental Review as the sole option other than a No Build, we are unlikely to get acceptable outcomes and may well find ourselves with another failed project.

Our significant concerns include:

- We don't have an accurate picture of the costs or funding of this project. This mega-project has the potential to soak up funding that could be used for many other critical transportation and seismic needs.
- The "High Bridge" (i.e., going over the shipping channel) approach is fundamentally monolithic and means the project cannot be broken up into phases.
- At 116 feet over the shipping channel (and the Coast Guard could require an even greater height), the grades on this project will likely make the

bridge crossing inaccessible for active transportation users of all ages and abilities. and may also create challenging conditions for freight at some ramps.

- The visual impact of the structure, particularly on Hayden Island and the Vancouver Waterfront, has not been sufficiently explored. The project has been careful to show bird's eye views. We need to see "from the ground up" renderings of what this structure will look like.
- Hayden Island and Vancouver will incur displacement of homes and businesses.
- Relying on screening choices made 15 years ago is insufficient. We deserve a public debate on options for both cost and performance from this project.

We also note that in the National Environmental Policy Act (NEPA) process, which is intended to ensure agencies consider the significant environmental consequences of their proposed actions and inform the public about their decision making, a "locally preferred alternative" (LPA) is not selected until *after* a range of alternatives have been advanced and thoroughly vetted. Choosing an LPA before doing the analysis is logically backwards, likely violates NEPA and deprives the region of fully informed choices about its future. Given the scale of this project--\$5 billion, and likely more--we deserve a thorough analysis before selecting an alternative. Therefore we are calling on the local partner governments to vote against moving this project to environmental review until the following things happen:

- The project prepares updated cost estimates for the high bridge alternative and a credible and complete finance plan for how those costs will be funded.
- That finance plan should include an Investment Grade Analysis of toll revenue for three purposes:
  - To understand how the countervailing impacts of tolls (suppressing demand) and additional lane capacity (inducing demand) will resolve, so that we understand how this project will affect overall amounts of driving, and the climate and air quality impacts from that driving.
  - To help the public better understand the cost of tolls as part of the equity analysis of the environmental review.

- To understand how much tolling can realistically contribute to the funding of the project.
- The project must create a “phaseable” alternative (e.g., a lower bridge with a lift span, or a tunnel), with sequencing priority addressing seismic resilience and transit connectivity, to advance into environmental review alongside the high bridge alternative.

Unless this is done, we believe there is significant risk that we will emerge from the environmental review process with another unfundable project, with no “Plan B” to prevent a repeat of the Columbia River Crossing failure. We are relying on you to make sure this does not happen.





All Aboard  
**NORTHWEST**



**FRONT**  
— AND —  
**CENTERED**

