

November 18, 2024

The Honorable Pete M. Buttigieg
Secretary of Transportation
U.S. Department of Transportation
1200 New Jersey Ave, SE
Washington, DC 20590

Subject: I-5 Interstate Bridge Citizen Comments DSEIS

Dear Secretary Buttigieg:

I am writing in opposition to the I-5 Interstate Bridge Replacement program's (IBR) application for federal funding. This includes The National Infrastructure Project Assistance (MEGA) discretionary grant program, the Bridge Investment Program and FTA Capital Investment Grant funding via the Infrastructure Investment and Jobs Act (IIJA) or other federal funding sources. Many citizens in the Portland metropolitan area oppose the current proposal.

Where's the value? Truly. What problem does this expenditure of perhaps \$10 billion taxpayer dollars solve? How much traffic congestion will be eliminated? Is "replacement" reasonable? Is the proposal actually "green" in terms of saving carbon emissions? This is the largest public works project in the history of the Portland metro area.

Would taxpayers replace the Brooklyn Bridge; or would they maintain and upgrade it as a valuable historical structure? What alternatives have been ignored or cast aside? What level of transit is needed to serve expected ridership? Can any form of transit actually generate significant ridership for the money expended, to justify a huge transit expenditure that exceeds one quarter of the cost of the project?

The project fails to solve the people's number one priority – saving time and reducing traffic congestion. Both commute times and traffic congestion will get worse in the Locally Preferred Alternative (LPA).

The Purpose and Need of the project lists six items to be addressed. 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.¹ The proposed LPA fails to adequately solve the top two items: traffic congestion and freight mobility.

This is a federal interstate highway. Its purpose is to enhance the movement of people and freight over long distances, to improve interstate and international commerce. The "solution" should fit the purpose. Portland has the 7th worst traffic congestion in the nation because they have refused to add vehicle capacity for the past 4 decades. This project does nothing to reduce

¹ IBR Draft SEIS https://justcrossing.org/sdeis-pre-release/ibr_draft_seis_1-00_pan_rev2_clean.pdf

congestion or save people and freight haulers time. Hours of congestion will increase by 30 percent after the completion of the project².

Instead, the proposal allocates 54 percent of the bridge surface to bikes, pedestrians and mass transit³. Only 46 percent is allocated to cars and freight haulers. Over one quarter of the current cost is for the transit component.

“General purpose” traffic makes up over 89 percent of current crossings, with another nearly 9 percent freight haulers. Transit makes up less than two percent of bridge traffic, with “active transportation” (bikes and pedestrians) a rounding error at 0.2 percent⁴. For 98 percent of the current crossings to be allocated just 46 percent of the proposed bridge space is beyond ridiculous.

How often can program administrators, politicians, and bureaucrats tell lies or half-truths, cherry-picking “facts” to suit a predetermined “solution”, before the federal transportation agencies refuse to fund a project? Taxpayers expect government agencies to stick to legitimate, demonstrable standards that enforce rules and actually solve transportation problems.

There is evidence of at least one agency trying to fleece taxpayers. Portland’s TriMet is demanding 19 new light rail vehicles for a 1.9 mile extension of an existing line. Furthermore, they plan to charge somewhere between \$10 million and \$15 million per vehicle, when they just paid \$4.5 million each for four new light rail vehicles on a 10-mile extension. The response from the IBR team – we just accept whatever the local agency gives us.⁵

There is a “new normal”⁶ where people work from home, drive their privately owned vehicles, and avoid using mass transit in commuting to work. Nationally and locally, transit ridership is down significantly.⁷ We need a project that addresses reality and saves people time, not wishful thinking or a special interest bailout of Portland’s TriMet transit agency.

A summary of citizen objections are as follows:

² Traffic congestion to increase by over 3 hours

<https://www.clarkcountytoday.com/news/traffic-congestion-to-increase-by-over-three-hours-after-7-5-billion-interstate-bridge-replacement-project/>

³ Over half bridge proposal allocated to transit, bikes and pedestrians

<https://www.clarkcountytoday.com/news/over-half-interstate-bridge-proposal-allocated-to-transit-pedestrians-and-bicyclists/>

⁴ IBR adds new transit options

<https://www.clarkcountytoday.com/news/ibr-adds-new-transit-options-for-consideration-to-new-bridge-over-columbia-river/>

⁵ Bridge management defends TriMet’s excessive demands

<https://www.clarkcountytoday.com/news/bridge-management-defends-trimets-excessive-demands-for-project/>

⁶ RTC “New Normal”

<https://www.clarkcountytoday.com/news/rtc-says-new-normal-for-low-transit-ridership-and-high-private-vehicle-use/>

⁷ Transit Ridership Down Significantly

<https://www.clarkcountytoday.com/news/national-and-local-transit-ridership-down-significantly-feds-report/>

- The cost projection has ballooned about 56 percent in 2 years and only has a “virtual design”. The IBR initially told the community the cost would be in a range of \$3.2 to \$4.8 billion and is now \$5 to \$7.5 billion.⁸ The program announced in December 2023 the cost will be rising again.⁹
- IBR Administrator Greg Johnson recently admitted updated cost projections will not occur “until this time next year”¹⁰, or June of 2025. An 18-month delay in updating costs is outrageous and fails to let citizens provide input on the impact of rising cost projections.
- The cost of the Hood River-White Salmon Bridge over the Columbia River just exploded 215 percent¹¹, adding to citizens' concerns about the future cost of the IBR.
- The transit component will be the most expensive rail project in the world, on a “per mile” basis. The IBR is seeking \$2 billion for a 1.9 mile TriMet MAX light rail extension, or one billion per mile.¹² They demand an upgrade to their Gresham vehicle maintenance facility, over ten miles from the project area..
- The current proposal spends 10 to 15 times what is needed. The two states will build a bridge over the Columbia River at Hood River for \$520 million¹³ (now exploding to \$1.12 billion). The IBR says the cost to replace just the bridge is \$500 million, or 6.6 percent of the entire project.¹⁴
- Less than half the structure is dedicated to vehicles and freight haulers. The IBR reports 54 percent of the structure will be allocated to transit, bikes and pedestrians¹⁵. This is an interstate freeway, supposedly dedicated for national, international and regional commerce. It’s not a recreation area.
- The IBR is proposing nothing more than a rebranded Columbia River Crossing (CRC) which was rejected a decade ago because it was “a bridge too low”, it had tolls, and was

⁸ Clark County Today

<https://www.clarkcountytoday.com/news/what-good-is-a-shiny-new-bridge-when-our-kids-cant-safely-cross-the-street-in-our-neighborhoods/>

⁹ Joe Cortright - \$9 Billion IBR cost

<https://www.clarkcountytoday.com/opinion/opinion-it-looks-like-the-interstate-bridge-replacement-could-cost-9-billion/>

¹⁰ Updated Costs for Interstate Bridge

<https://www.clarkcountytoday.com/news/updated-costs-for-interstate-bridge-wont-happen-until-next-year/>

¹¹ Hood River Bridge cost explodes 215 percent

<https://www.clarkcountytoday.com/news/hood-river-bridge-cost-explodes-215-percent/>

¹² Clark County Today

<https://www.clarkcountytoday.com/news/i-5-bridge-replacement-project-has-the-worlds-most-expensive-light-rail/>

¹³ Hood River Bridge Authority <https://hoodriverbridge.org/about>

¹⁴ Joe Cortright - \$500 million bridge costs \$7.5 billion

<https://www.clarkcountytoday.com/opinion/opinion-why-does-a-500-million-bridge-replacement-cost-7-5-billion/>

¹⁵ Over Half IBR allocated to transit, bikes and pedestrians

<https://www.clarkcountytoday.com/news/over-half-interstate-bridge-proposal-allocated-to-transit-pedestrians-and-bicyclists/>

“a light rail project in search of a bridge”¹⁶. The CRC was a “financial nightmare” according to forensic accountant Tiffany Couch.¹⁷

- Economist Joe Cortright says the IBR proposal is “a value destroying proposition”¹⁸.
- The US Coast Guard has rejected the IBR request to build a “bridge too low” with only 116 feet of clearance for marine traffic. They appropriately demand a bridge that provides at least the current 178 feet of clearance¹⁹ and prefer “unlimited” clearance.
- The project will not save people time. Travel times will double from Vancouver to Portland by 2045. Furthermore, they predict HALF of rush hour traffic will be stuck going zero to 20 mph after spending \$7.5 billion²⁰.
- Hours of congestion will increase by 30 percent to 13.75 hours daily, if the Locally Preferred Alternative (LPA) is built, comparing 2019 traffic congestion with 2045 projected congestion. The IBR is accepting a “solution” that doesn’t solve current congestion problems, and will allow things to get much worse, all while spending over \$7.5 billion. Citizens in cars and trucks will have paid tolls for two decades²¹ towards the cost, while transit and active transportation users will pay nothing.
- The proposal is bad for the environment. The IBR projects that half of rush hour vehicles will be stuck in congestion traveling zero to 20 mph a decade after completion of the project. Cars stuck idling can emit 20 times more pollution than those traveling 30 mph.²²
- Almost all of the IBR’s projected “carbon emission reduction” comes from people getting out of POVs and riding transit²³. If people refuse transit, there is no CO2 reduction.
- A miniscule hoped for reduction in vehicle miles traveled (VMT) of 0.55 percent makes up the balance of projected CO2 emissions reduction. Note there never has been a reduction in VMT except for significant economic downturns and the pandemic lockdowns²⁴.
- Over 25 percent (\$2 billion) of the project's cost is tied to a 1.9-mile extension of light rail that almost nobody will ride. It is more than triple the previous cost per mile for Portland’s light rail. The MAX Yellow Line travels 14 miles per hour – far too slow for people wanting to save time. Eliminating light rail in favor of Bus Rapid Transit (BRT) would save nearly \$2 billion. It is far more flexible and would travel at roughly twice the speed of light rail.

¹⁶ The \$2.5 Billion bribe [The \\$2.5 Billion Bribe \(wweek.com\)](https://www.wweek.com/news/legislators-get-final-update-on-ibr-before-2024-legislature-sessions-begin/)

¹⁷ Forensic Accountant - CRC a financial nightmare <https://couv.com/sidebar/tiffany-couch-crc-white-paper>

¹⁸ Legislators get final update

<https://www.clarkcountytoday.com/news/legislators-get-final-update-on-ibr-before-2024-legislature-sessions-begin/>

¹⁹ Oregonian - Coast Guard demands higher bridge

<https://www.oregonlive.com/commuting/2022/07/coast-guard-demands-higher-replacement-interstate-bridge-in-preliminary-decision.html>

²⁰ Clark County Today

<https://www.clarkcountytoday.com/opinion/opinion-adding-new-lanes-reduces-traffic-congestion-on-i-5/>

²¹ Traffic congestion to increase over 3 hours

<https://www.clarkcountytoday.com/news/traffic-congestion-to-increase-by-over-three-hours-after-7-5-billion-interstate-bridge-replacement-project/>

²² The Speed Sweet Spot <https://www.nrdc.org/stories/speed-sweet-spot>

²³ The “faux” green Interstate Bridge replacement

<https://www.clarkcountytoday.com/news/the-faux-green-interstate-bridge-replacement-proposal/>

²⁴ Annual VMT in the US <https://afdc.energy.gov/data/10315#>

- TriMet is demanding new taxes from both states²⁵, in order to pay for operations and maintenance of the light rail extension. Economist Joe Cortright reported “Neither C-TRAN nor TriMet is willing to commit any funds of their own to this project. This is especially important because the USDOT (Federal Transit Administration) won’t fund the capital construction of a project that has no source of operating funds.”
- TriMet’s JC Vannatta told legislators: “TriMet will not be responsible for O&M costs resulting from the extension into Vancouver.”
- TriMet is demanding the project pay for 19 light rail vehicles for a 1.9-mile extension of an existing line. That’s one new vehicle for every one-tenth of a mile.²⁶ Absurd. Furthermore, the price they seek is \$190 million to \$290 million, or \$10 million to over \$15 million per vehicle, between double and triple what they recently paid for replacement light rail vehicles.
- The 2022 INRIX reports Portland is 12th worst in the nation for congestion. Interstate traffic tries to move through the heart of Portland where the I-5 constricts to 2 lanes and poorly designed interchanges cannot handle existing traffic. People lost 72 hours at a cost of \$1,216 per driver. The last mile speed was 15 mph.²⁷ Such problems are appropriately solved with bypasses that provide alternative routes around inner city bottlenecks. This project focuses on the wrong area north of the primary I-5 bottleneck and does not provide any alternative route.
- The 2023 INRIX study reports rush hour commuters spent the equivalent of a full workweek stuck in traffic last year, six hours longer than in 2022. Inrix ranks the Rose Quarter to the Interstate Bridge as the 15th-slowest rush hour traffic corridor in the entire country. Drivers lost 15 minutes a day there to traffic, the equivalent of 61 hours over a year.²⁸ The project and Oregon refuse to add vehicle capacity at the Rose Quarter to fix the region’s real #1 bottleneck.
- In 2024 Portland had the nation’s 7th worst traffic congestion²⁹. Portland sees six hours and 36 minutes of average daily congestion on its roads compared with the national average of three hours and 41 minutes³⁰.
- The IBR has not done a current traffic projection study. CRC data from 2005 and 2008 studies indicated in 2030, there would be 184,000 daily movements on the corridor, requiring 5.6 lanes in each direction. It further showed 288,000 daily movements by 2058, requiring 8.3 lanes in each direction.³¹ Replacing a 3-lane bridge with another 3

²⁵ TriMet demands new taxes for O&M of light rail

<https://www.clarkcountytoday.com/opinion/opinion-new-taxes-required-for-1-3-billion-light-rail-extension-to-vancouver/>

²⁶ Clark County Today

<https://www.clarkcountytoday.com/news/paying-too-much-for-too-many-max-light-rail-vehicles/>

²⁷ INRIX 2022 – <https://inrix.com/scorecard-city-2022/?city=Portland%20OR&index=37>

²⁸ INRIX 2023 Oregonlive

<https://www.oregonlive.com/business/2024/07/portland-traffic-got-a-lot-worse-last-year-study-finds.html>

²⁹ Portland Traffic among the worst

<https://www.koin.com/news/portland/portland-traffic-among-the-worst-in-the-u-s-report-shows/>

³⁰ Axios <https://www.axios.com/local/portland/2024/09/11/traffic-congestion-worst-study-i-5-bridge>

³¹ Kevin Peterson analysis

<https://www.clarkcountytoday.com/news/transportation-architect-kevin-peterson-reveals-flaws-in-the-columbia-river-crossing-and-what-could-be-an-option-for-the-interstate-bridge/>

lane bridge leaves the transportation corridor short by 3 lanes (each direction) on opening day.

- Because the two bridges (I-5 & I-205) over the Columbia River act as a transportation system, in 2058 the traffic was projected to be 549,000 daily vehicles, requiring 16.4 lanes in each direction. In 2035 at the completion of the IBR, there will be 7 lanes, leaving a shortage of 9 lanes (each direction).
- The Clark County Council supports immediate planning for 3rd and 4th bridges.³² Their focus is on actually saving people travel time, reducing traffic congestion and improving freight mobility.
- The LPA ignores the requests of Hayden Island residents (ground zero for the project). The HiNoon organization wants a 3rd bridge built adding capacity over the Columbia River before any replacement or repurposing of the Interstate Bridge begins.³³
- Hayden Island Community Advisory Group member Tom Gentry was involuntarily removed from the IBR Community Advisory Group after a year, for simply asking too many logical questions³⁴ and advocating for the concerns of island residents³⁵.
- The on/off ramps at the Vancouver waterfront were predicted to possibly have 6 percent grades. The bridge itself may have a 4 percent grade³⁶. Rather than improving safety, this project adds potential new hazardous safety conditions, especially for freight haulers in rain, snow and ice that are common Portland winter weather conditions,³⁷ points out a retired engineer.
- The failed Columbia River Crossing (CRC) was labeled “A bridge too false” by a local media outlet³⁸ due to all the lies and half-truths told. The IBR continues that pattern of misleading the public.
- Transit ridership projections are grossly unrealistic. Presently there are less than 1,000 transit boardings across the two Columbia River (I-5 and I-205) bridges; 525 on I-5 and 295 on I-205. The IBR projects by 2045 there will be 26,000 to 33,000 daily boarding on

³² Clark County supports planning for 3rd & 4th bridges

<https://www.clarkcountytoday.com/news/county-approves-planning-for-third-and-fourth-transportation-corridors/>

³³ Interstate Bridge Replacement plan throws North Portlanders under the truck –

https://northpeninsulareview.com/wp-content/uploads/2023/08/Newspaper_8-1-23.pdf

³⁴ Gentry questions IBR

<https://www.clarkcountytoday.com/news/interstate-bridge-replacement-effort-gets-36-million-funding-boost-as-community-group-grapples-with-options/>

³⁵ Clark County Today

<https://www.clarkcountytoday.com/news/interstate-bridge-replacement-effort-gets-36-million-funding-boost-as-community-group-grapples-with-options/>

³⁶ Bob Ortblad - Dangerous Options

<https://www.clarkcountytoday.com/opinion/letter-the-interstate-bridge-replacement-program-has-presented-three-dangerous-i-5-bridge-options/>

³⁷ Bob Ortblad – New bridge design proves critics right

<https://www.clarkcountytoday.com/opinion/opinion-ibr-floats-new-bridge-design-proving-critics-right/>

³⁸ Willamette Week <https://www.wweek.com/portland/article-17566-a-bridge-too-false.html>

the I-5 corridor alone.³⁹ There is no evidence that transit ridership will increase 30 to 50 fold in the next two decades⁴⁰, let alone during the 100-year life of a replacement bridge.

- The IBR reports 63 percent⁴¹ of people rank travel time as their most important priority for transit. Yet the MAX Yellow Line only travels an average of 14 mph, too slow to attract new ridership.
- TriMet broke multiple promises to citizens and federal agencies when the Yellow Line was created two decades ago. They promised 8 trains an hour in 2020⁴², yet only have 4 an hour at peak times and two an hour at non-peak times today⁴³.
- Our Regional Transportation Council (MPO) recently reported a “new normal”, which included a 150 percent increase in people working from home, a 68 percent reduction in transit ridership, and people’s preference for driving their privately owned vehicles.⁴⁴
- A 2018 PEMCO survey found 94 percent⁴⁵ of Portland metro area residents preferred to use their privately owned vehicles for transportation.
- Former Oregon Transportation Commissioner (OTC) Chair Robert Van Brocklin recently said only 4 percent of people in Portland use transit.⁴⁶ He and other OTC members sounded alarms and shared skepticism about how the state would pay for the projects⁴⁷.
- Only 525 daily boardings on the C-TRAN “express” bus routes using I-5, an increase of two people from the prior year. Local route ridership has returned to pre pandemic levels, but not ridership across the Columbia River, according to the CEO.
- Unrealistic forecasts including 26,000 to 33,000 transit riders on the I-5 corridor are a red flag. There are ample historical records that accurately document the fact that rather than skyrocketing, local transit ridership continues its long-term declining trend. Transit trips make up far less than 1 percent of bridge traffic. Common sense would not spend a grossly disproportionate percentage on transit at the expense of more than 99 percent of the bridge traffic.

³⁹ Clark County Today

<https://www.clarkcountytoday.com/news/transit-gets-much-attention-as-details-on-ibr-about-to-be-released/>

⁴⁰ Another transit failure?

<https://www.clarkcountytoday.com/news/is-the-ibr-setting-up-another-transit-failure/>

⁴¹ TriMet’s broken promises

<https://www.clarkcountytoday.com/news/trimets-broken-promises-on-getting-people-to-use-transit/>

⁴² Cascade Policy Institute - Broken Promises

<https://cascadepolicy.org/transportation/the-max-yellow-line-a-look-back-after-15-years/>

⁴³ TriMet Yellow Line schedule https://trimet.org/schedules/w/t1190_1.htm

⁴⁴ “New Normal” - Clark County Today

<https://www.clarkcountytoday.com/news/rtc-says-new-normal-for-low-transit-ridership-and-high-private-vehicle-use/>

⁴⁵ Will IBR force people out of cars?

<https://www.clarkcountytoday.com/news/will-the-ibr-try-to-force-people-out-of-their-cars/>

⁴⁶ A data driven solution for IBR 50 years into future

<https://www.clarkcountytoday.com/news/a-data-driven-interstate-bridge-solution-50-years-into-the-future/>

⁴⁷ Two OTC members resign early

<https://bikeportland.org/2023/04/14/shakeup-at-oregon-transportation-commission-as-two-members-step-down-before-terms-expire-372946>

- Five years ago, Clark County's C-TRAN offered seven "express" bus routes over the Columbia River. Today there are three. There is so little demand for cross-river transit that Portland's TriMet does not offer bus service to Clark County.
- In 2012, CTRAN conducted a survey on light rail, which was rejected in every city in Clark County. The entire county was allowed to vote. In 2013, a county-wide advisory vote on light rail was held. Over 68 percent of voters agreed that voters should be allowed to vote before any taxpayer funds are spent to bring light rail into Clark County.⁴⁸
- Improving and fostering interstate commerce must be a top priority for any transportation project. Adding tolls to the I-5 bridge will divert traffic onto the I-205 bridge and foreseeably gridlock that alternative route. Tolls penalize drivers who would otherwise add interstate commerce to our local economy. The tolling impediment discourages interstate commerce and drives a wedge between the two sides of our currently united metropolis. Spending billions to harm the financial well being of this area would do far more harm than good.
- Tolling is unwanted by citizens. Three different levels of tolls are being discussed "if" federal authorities approve multiple plans under consideration by both the IBR, ODOT and Portland transportation officials. The IBR wants tolls to cross the bridge. ODOT additionally wanted "per mile" road usage charges, via a recently canceled Regional Mobility Pricing Program.⁴⁹ Oregon legislators say tolling is still alive⁵⁰. They have estimated tolls could be in excess of \$30 per day for a round trip from Vancouver to Wilsonville.⁵¹
- A Feb. 2024 public opinion poll revealed 76 percent of citizens overall in the 3 Portland metro counties (excluding Clark County in WA) reject tolling. The highest rejection was in Clackamas County with 91 percent of people opposed⁵².
- ODOT revealed an initial 83-86 percent "cost of collection" for I-205 tolls, triggering greater outrage among citizens.⁵³
- Federal law prohibits tolling on existing roads unless new lanes and vehicle capacity are being added. The Oregon I-205 tolling project would be the first location in the nation to have tolls on existing pavement, when no new lanes or vehicle capacity is being built. Citizens view the IBR as allowing the camel's nose into the tent for expanded tolling in the near future.

⁴⁸ IBR adds new transit options

<https://www.clarkcountytoday.com/news/ibr-adds-new-transit-options-for-consideration-to-new-bridge-over-columbia-river/>

⁴⁹ Kotek cancels RMPP

<https://www.clarkcountytoday.com/news/oregon-gov-kotek-kills-i-5-i-205-per-mile-tolling-but-proposed-i-5-bridge-tolls-remain/>

⁵⁰ OPB - Tolling is still on the table -

<https://www.opb.org/article/2024/03/12/plan-to-add-tolls-portland-oregon-highways-dead-for-now/>

⁵¹ Joe Cortright

<https://www.clarkcountytoday.com/opinion/opinion-driving-between-vancouver-and-wilsonville-at-5-p-m-od-ot-plans-to-charge-you-15/>

⁵² DHM Public Opinion Survey <https://westlinnoregon.gov/citycouncil/i-205-regional-tolling-survey-results>

⁵³ 83-86% Cost of Collection

<https://www.clarkcountytoday.com/news/odots-86-percent-cost-of-collecting-tolls-on-i-205-revealed/>

- The IBR finance plan seeks at least \$1.2 billion in tolling revenue and potentially \$1.6 billion. Eliminating the \$2 billion light rail component and building a \$50 million (or less) BRT option would eliminate the need for tolling. By law, federal funds (FTA) can pay a maximum of 50 percent⁵⁴ of the light rail cost.
- Oregon Congresswoman Lori Chavez-DeRemer introduced the **No Tolls on Oregon Roads Act** that would prohibit the use of federal funds for tolling on I-5 and I-205 and prohibits the U.S. Department of Transportation (USDOT) from approving I-5 and I-205 tolling projects.⁵⁵
- Congresswoman Chavez-DeRemer believes there was a flawed Draft I-205 Environmental Assessment (EA); ambiguity over multiple tolling proposals; failed ODOT public outreach and a host of other problems.⁵⁶
- “Replacing the I-5 Interstate Bridge is a solution for nothing” according to the Cascade Policy Institute.⁵⁷
- Other viable options, including a 3rd bridge or a tunnel⁵⁸ were improperly evaluated and discarded without proper screening and community input⁵⁹. Local civil engineers have proven the IBR issued an intentionally flawed report and evaluation of an immersed tube tunnel option. The IBR was off by a factor of four regarding excavation and required depths.⁶⁰
- Traffic diversions will be horrendous for local communities. A CRC evaluation showed 35,000 vehicles diverting to I-205 due to Interstate Bridge tolls⁶¹. ODOT evaluated the impacts of tolling in 2017-2018 and predicted 130,000 total vehicle diversions once tolls were placed on all Portland area freeways.⁶²
- The “cost of collection” for tolls can be extremely high⁶³. It’s an inefficient system for raising transportation dollars. In the Seattle area on I-405, the cost of collection was 68

⁵⁴ Federal Register

<https://www.federalregister.gov/documents/2022/04/28/2022-09143/notice-of-fta-transit-program-changes-authorized-funding-levels-and-implementation-of-the>

⁵⁵ Congresswoman Chavez-DeRehmer [Chavez-DeRemer Introduces Legislation to Kill Oregon Tolling Permanently | Representative Chavez-Deremer \(house.gov\)](#)

⁵⁶ Congresswoman Chavez-DeRemer [Lori Chavez DeRemer Digital Letterhead \(house.gov\)](#)

⁵⁷ John Charles, Cascade Policy Institute

<https://cascadepolicy.org/transportation/replacing-the-i-5-interstate-bridge-is-not-a-solution-for-anything/>

⁵⁸ Bob Ortblad

<https://www.clarkcountytoday.com/opinion/letter-retraction-required-due-to-conflict-of-interest/>

⁵⁹ Bob Ortblad - Immersed Tube Tunnel option

<https://bikeportland.org/2022/02/23/the-overlooked-i-5-columbia-crossing-option-an-immersed-tube-tunnel-348880>

⁶⁰ Clark County Today - Is a tunnel actually viable? [Is a tunnel actually viable for crossing the Columbia River? | ClarkCountyToday.com](#)

⁶¹ Robert Liberty data

<https://www.clarkcountytoday.com/news/when-the-facts-dont-jive-with-the-data-on-the-interstate-bridge-replacement/>

⁶² You’re actually going to make things worse –

<https://www.clarkcountytoday.com/news/tolling-youre-actually-going-to-make-things-worse/>

⁶³ WSTC

<https://www.clarkcountytoday.com/news/state-tolling-revenues-down-158-million-due-to-pandemic-with-464-million-drop-over-decade/>

percent⁶⁴. The gas tax has under a one percent cost of collection. Furthermore, the entire Washington state tolling system needed to be bailed out by General Fund revenues from the legislature for 3 years.

- The Draft Supplemental Environmental Impact Statement (DSEIS) is two years late in its release⁶⁵. Multiple facets of the document are inaccurate and incomplete⁶⁶. Continuing to fund a project that can't meet transparency and environmental requirements is a waste of federal and state dollars.
- The DSEIS reveals the program will save a miniscule 31 metric tons (MT) of CO2 per day, in spite of claims the project is "green". It will take over 41 years to recover construction CO2⁶⁷. Furthermore, the project will increase daily Vehicle Miles Traveled (VMT) in direct opposition to goals of both states requiring a reduction in VMT.
- Doing nothing would save 11 minutes on C-Tran's "Express" bus service to Portland, when compared to building the LPA. Multiple facets of the proposed project contradict various environmental goals.
- The "seismic risk" to the current structure has been blown out of proportion. The real experts at the M9 Project (Univ. of Washington) predict only a 10-14 percent chance of a magnitude 9 earthquake happening in the next 50 years. That means there's an 86 - 90 percent chance a major earthquake that would destroy the bridge will not happen in the next 50 years.⁶⁸

The IBR program is proposing to spend between \$5 billion and \$7.5 billion (current price) replacing the two steel Interstate Bridge structures across the Columbia River. One bridge is 34 years younger than the Brooklyn Bridge and the other is 75 years younger. In 1958 the original bridge received a significant structural upgrade. Nobody would think of destroying the Brooklyn Bridge. Why destroy the two Interstate Bridge structures? They are on the National Historic Register. The oldest steel bridge still in use in the U.S. was built in 1838.⁶⁹

When you visited the Portland area July 7th, you spoke about saving time being the most important aspect of the Washougal rail crossing project the DOT is funding. From a local news report⁷⁰:

⁶⁴ Clark County Council

<https://www.clarkcountytoday.com/news/county-council-discussion-on-tolling-interstate-bridge-and-oregon-freeways-centers-on-the-need-for-the-plan-to-be-project-specific-and-time-limited/>

⁶⁵ DSEIS is 2 years behind schedule

<https://www.clarkcountytoday.com/opinion/opinion-the-interstate-bridge-replacement-is-two-years-behind-schedule/>

⁶⁶ What the IBR doesn't want you to know <https://cityobservatory.org/what-ibr-doesnt-want-you-to-know/>

⁶⁷ Faux "green" IBR revealed

<https://www.clarkcountytoday.com/news/the-faux-green-interstate-bridge-replacement-proposal/>

⁶⁸ What is the seismic risk

<https://www.clarkcountytoday.com/news/what-is-the-seismic-risk-of-the-cascadia-subduction-zone-and-earthquakes-in-the-pacific-northwest/>

⁶⁹ Dunlap's Creek Bridge, PA <https://www.aisc.org/nsba/timeline/>

⁷⁰ Buttigieg asked where's the value

<https://www.clarkcountytoday.com/news/dot-secretary-pete-buttigieg-asked-where-the-value-in-the-i-5-bridge-replacement-project/>

“Buttigieg spoke about people’s most valuable commodity being time, and the Washougal project will help people in that community save time. “That’s why this matters so much,” he said. But he also spoke of building transportation projects that will “serve our children and our grandchildren”.

This is extremely relevant to the IBR because the proposed Locally Preferred Alternative does not save people time. Period.

Presently, the morning commute time from north Vancouver to Portland’s Fremont Bridge takes 29 minutes. The IBR predicts in 2045 it will take 60 minutes. The IBR proposes to replace an over congested 3-lane bridge with another 3-through lane bridge (and one auxiliary lane). If they did nothing (saving \$7.5 billion), the “no build” travel time would be 63 minutes.

The IBR reports 28 percent of rush hour vehicles are going zero to 20 mph today. After building the LPA, they predict congestion to worsen to 50 percent of rush hour traffic traveling zero to 20 mph. In addition to failing to improve congestion, environmental pollution will worsen proportionally. Tens of thousands of vehicles stuck in stop and go traffic is horrible for the environment. It fails to save people time which you correctly identified as the most important thing to people.

Oregon State Senator Lew Frederick asked IBR Administrator Greg Johnson “how much time will people save?” Johnson’s response - “not much”.⁷¹

The I-5 Interstate Bridge is part of a critical trade route for regional, national and international commerce. The real “stop light” for the entire I-5 transportation corridor in the Portland metro area is not the Interstate Bridge but Portland’s Rose Quarter, where I-84 merges with I-5. The interstate narrows down to just two lanes where the two interstates merge in the heart of the city. True insanity from a freeway transportation system standpoint. This is the only 2-lane section of I-5 in an urban area from Canada to Mexico.

In a 2003 Portland/Vancouver I-5 Transportation & Trade Partnership, ODOT Director Bruce Warner offered the following comparison of river crossings. Portland has two highway crossings and one rail crossing of the Columbia River.

Norfolk had 4 highway crossings & zero rail crossings. Cincinnati had 10 highway crossings and 2 rail crossings. Kansas City had 10 highway crossings and 3 rail crossings. Pittsburgh had over 30 highway crossings and 3 rail crossings. St. Louis had 8 highway crossings and 2 rail crossings.

By any measure, the Portland metro area was behind 21 years ago. We’re further behind today with no plans for a 3rd or 4th bridge.

⁷¹ Clark County Today

<https://www.clarkcountytoday.com/news/bi-state-legislative-committee-reviews-interstate-bridge-progress-and-issues/>

Transportation architect Kevin Peterson has worked on transportation systems including transit, all over the world. He called the Rose Quarter “the elephant in the room” regarding traffic congestion for the I-5 corridor. Peterson evaluated the project’s traffic projections (2005 and 2008) and offered the following conclusions.

“The I-5 transportation corridor will need at least 5 lanes in each direction in 2030, 2 to 4 years prior to the opening of the IBR’s LPA proposal. The corridor will need at least 7 lanes in each direction by 2045, the date the IBR uses for travel time and traffic congestion comparisons. By 2065, the I-5 corridor would need at least 9 lanes in each direction.”

Oregon’s Cascade Policy Institute recently noted: “The Interstate Bridge Replacement Project, now in its 26th year of planning, will have no effect on traffic congestion because it doesn’t add capacity. We will still have only two bridges over the Columbia River in the Portland region.”⁷² They also note congestion relief has been the people’s top priority for 30 years. Yet it will get worse because the Metro regional government doesn’t care what the people want.⁷³

PEMCO reported (2018) that 94 percent of people want to use their privately owned vehicles for transportation. An April 2019 Oregon Transportation Commission survey found 51 percent of citizens want to “expand and improve interstates and interstate bridges.” Another 14 percent want expanded arterials⁷⁴. Two out of three people want added vehicle capacity as their top transportation priority.

Former Metro Councilor and senior counsel to Oregon’s Congressman Earl Blumenauer Robert Liberty spoke out against the program. He noted in 2005, the Columbia River Crossing traffic analysis showed no difference between the “no build” and spending \$3.6 billion on the CRC’s LPA, in terms of number of vehicles traveling on the two transportation corridors across the Columbia River. Liberty believed it was not worth the money, then or now.⁷⁵

“Replacing the I-5 Interstate Bridge is not a solution for anything,” states the Cascade Policy Institute.⁷⁶ *“The entire I-5 corridor from Wilsonville to Vancouver is over-subscribed for about 12 hours per day, and this will only get worse as the region grows.”*

⁷² Cascade Policy Institute Oregon’s highway freeze is not about the weather
<https://cascadepolicy.org/transportation/oregons-highway-freeze-is-not-about-the-weather/>

⁷³ Cascade Policy Institute Metro gives up on reducing traffic congestion
<https://cascadepolicy.org/transportation/metro-gives-up-on-reducing-traffic-congestion/>

⁷⁴ Clark County Today - A data driven response
<https://www.clarkcountytoday.com/opinion/opinion-a-data-driven-response-to-governors-inslee-and-brown/>

⁷⁵ When the facts don’t jive - Clark County Today
<https://www.clarkcountytoday.com/news/when-the-facts-dont-jive-with-the-data-on-the-interstate-bridge-replacement/>

⁷⁶ Cascade Policy Institute Replacing the I-5 bridge is not a solution for anything
<https://cascadepolicy.org/transportation/replacing-the-i-5-interstate-bridge-is-not-a-solution-for-anything/>

The Interstate Bridge should be left alone for now, and ODOT should be directed to start planning for two new bridges – one upstream from the Glenn Jackson I-205 Bridge, and one downstream from the I-5 Interstate Bridge. The new crossings would eliminate most congestion on the existing bridges, while providing essential redundancy in the event of a catastrophic earthquake.

The Cascade Policy Institute recommendation mirrors the 2008 Regional Transportation Council (RTC) “Visioning Study”⁷⁷, planning for when Clark County, WA reached 1 million in population. They identified the need for two new bridges and offered two options for each location. Over 100,000 people have moved into the county, now at about 525,000. No planning is under way for even a single new crossing. Another 190,000 are projected by 2045 according to the Clark County Transportation Alliance.⁷⁸

A single bridge and transportation corridor will not solve traffic growth and congestion problems. A 3rd and 4th bridge (or tunnel) across the Columbia River are needed. That’s what the data shows. It makes no sense to fund the replacement of a 3-lane bridge with another 3-lane bridge that will immediately be congested the day it opens.

The Cascade Policy Institute mentioned “No other type of infrastructure is artificially constrained this way. When public schools experience a growth in students, school districts build or buy more classroom space. Regional drinking water providers spend billions of dollars on new pipes and treatment facilities to accommodate growth. Only highways are subject to scarcity by design.”⁷⁹

A 2011 CRC Traffic Technical Report showed essentially no difference in the number of vehicles using the I-5 and I-205 corridors after completing the CRC’s Locally Preferred Alternative, than would be under the “no build” option. The expenditure of \$3.6 billion would deliver no improvement in vehicle capacity and throughput.

The CRC lied about the number of jobs created⁸⁰. The IBR is painting similar rosy pictures of economic opportunities, without legitimate substantiation. The CRC was labeled “A bridge too false⁸¹”. Most of the case for the \$3.6 billion Columbia River Crossing wasn’t true. The same can be said about the Interstate Bridge Replacement Program.

⁷⁷ RTC Visioning Study

<https://www.clarkcountytoday.com/news/regional-transportation-council-urged-to-revisit-2008-transportation-corridors-visioning-study/>

⁷⁸ 2025 Clark County Transportation Alliance Policy Statement

⁷⁹ Cascade Policy Institute

<https://www.clarkcountytoday.com/opinion/opinion-metro-gives-up-on-reducing-traffic-congestion/>

⁸⁰ A lie times ten [Not True, Times Ten \(wwweek.com\)](http://www.wwweek.com)

⁸¹ A Bridge too False [A Bridge Too False \(wwweek.com\)](http://www.wwweek.com)

The “seismic risk” is not a current threat. The 6.8 Nisqually Quake in 2001 did no damage to any Portland area bridges.⁸² The second Interstate Bridge structure was completed in 1958, just 8 years prior to the completion of the I-5 Marquam Bridge just 7 miles south of the project in Portland. These structures are deemed “safe” by both ODOT and WSDOT.

Randall O’Toole has been examining transit for decades and is known as the “Anti Planner.” He talks about “strategic misrepresentation” as a form of lying on light rail and these mega projects. He notes they over-project transit ridership and under-estimate costs in a 2022 column, Lie Rail Supporters Keep On Lying.⁸³

Almost every light-rail project ever built has cost far more than the original projections. Cost overruns are so systematic that Oxford researcher Bent Flyvbjerg says they are “best explained by strategic misrepresentation, that is, lying.”⁸⁴ Other lies included overestimated ridership numbers and the claim that light rail is “high-capacity transit.”

“In the world of civic projects, the first budget is really just a down payment. If people knew the real cost from the start, nothing would ever be approved. The idea is to get going. Start digging a hole and make it so big there’s no alternative to coming up with the money to fill it in.” San Francisco Mayor Willie Brown⁸⁵.

A 2022 article by Charles Marohn in the publication Strong Towns, shows how the game is played. He calls it “engineering malpractice.” He also labels seeking public input: “engagement theater.”⁸⁶ The IBR has been full of engagement theater, creating the appearance of reaching out to citizens, but ignoring their input.

The Portland MAX light rail is currently limited by almost all trains needing to cross the 1912 Steel Bridge over the Willamette River. During rush hour, there is a light rail train crossing the bridge every 90 seconds. There is no ability for TriMet to add additional light rail trains to expand light rail service for the IBR or any other route. Furthermore, the Yellow Line only travels at 14 mph - far too slow to be a viable alternative for interstate commuters.

Additionally, “when” the major earthquake hits, the Steel Bridge in Portland will be damaged or destroyed, eliminating light rail service as a transportation option. One possible “solution” would be to underground the MAX light rail via a tunnel under the Willamette River or to build a separate, new seismically sound bridge. TriMet is currently evaluating a tunnel option, but has no plans or ability to fund the tunnel.

TriMet’s MAX light rail is limited to just 2 light rail cars in a train, due to the short length of a downtown Portland block. Adding a 3rd or 4th light rail car would block downtown Portland

⁸² Nisqually Quake https://en.wikipedia.org/wiki/2001_Nisqually_earthquake

⁸³ Randall O’Toole <http://ti.org/antiplanner/?p=19978>

⁸⁴ Brent Flyvbjerg <http://americandreamcoalition.org/transit/Flyvbjerg02.pdf>

⁸⁵ Desperate Rail Gambit <https://www.city-journal.org/article/desperate-rail-gambit>

⁸⁶ Engagement Theater

<https://www.strongtowns.org/journal/2022/4/4/ignoring-induced-demand-is-engineering-malpractice>

intersections, bringing traffic movement to a standstill. Until the light rail is either underground (a subway) or elevated, this restriction will remain the achilles heel of MAX to truly grow their light rail system.⁸⁷

Voters in both states have rejected light rail. In 2019, Oregon voters rejected a new TriMet Southwest Corridor light rail line.⁸⁸ Clark County voters repeatedly reject light rail.⁸⁹ In 1995, Clark County voters rejected light rail.⁹⁰ In 2013, 223 out of 228 Clark County precincts rejected the CRC and its light rail and tolls⁹¹.

The CRC and now the IBR is “a light rail project in search of a bridge”. These were the words of an Oregon Supreme Court Justice. Gov. Jay Inslee told citizens “no light rail, no bridge” in 2014. Representative Earl Blumenauer in 2019 demanded light rail or nothing. “It’s a deal breaker unless it’s there”⁹²

An I-5 Transportation Trade Partnership report⁹³ two decades ago said: "Oregon interests required emphasis on a multi-modal solution * * * because of the difficulty of accommodating [traffic] demand through a highway-only expansion of I-5," Clark County interests "needed a highway element because the land use patterns of Clark County require[] a system with greater dependence on auto access." They said a 10-lane bridge performed the best.

In 2010, “Metro staff developed a forecast of the growth that would be induced by a full build out of the CRC project, with a 10-to-12-lane bridge, light rail line and \$2 rush-hour tolls each direction.”⁹⁴

C-TRAN’s operating costs for its BRT system are 34 percent cheaper than the operating costs (per boarding rider) for the MAX light rail. TriMet’s MAX costs are \$8.24 versus C-TRAN’s \$5.44 BRT cost per boarding passenger.⁹⁵

⁸⁷ Metro MAX Tunnel Study [MAX Tunnel Study Findings.pdf \(oregonmetro.gov\)](https://www.oregonmetro.gov/files/2017/07/MAX-Tunnel-Study-Findings.pdf)

⁸⁸ Oregon Public Broadcasting
<https://www.opb.org/article/2020/11/04/metro-tax-light-rail-portland-pass-fail-result/>

⁸⁹ Congresswoman Jaime Herrera Beutler
<https://www.clarkcountytoday.com/news/opposition-to-ibr-light-rail-and-tolling-follows-two-meetings-of-bridge-leadership/>

⁹⁰ CRC is Rail Project http://www.debunkingportland.com/crc-is_rail_project.html

⁹¹ Resurrecting the Columbia River Crossing
<https://www.thereflector.com/stories/resurrecting-the-columbia-river-crossing.47643>

⁹² Blumenauer demands light rail
<https://www.wweek.com/news/state/2021/04/10/u-s-rep-earl-blumenauer-says-its-light-rail-or-bust-for-next-columbia-river-bridge/>

⁹³ I-5 Transportation Trades Partnership
https://data.wsdot.wa.gov/accountability/ssb5806/Repository/2_Long%20Range%20Planning/I-5%20Partnership/Summary%20Documents/Summary.pdf

⁹⁴ Metro finding on Columbia River Crossing
<https://www.oregonmetro.gov/news/metro-finds-columbia-river-crossing-toll-bridge-with-light-rail-would-have-negligible-impact-on-growth>

⁹⁵ When the facts don't jive with the data
<https://www.clarkcountytoday.com/news/when-the-facts-dont-jive-with-the-data-on-the-interstate-bridge-replacement/>

The current proposal which mirrors the failed Columbia River Crossing, is loaded with unnecessary pork barrel spending for the \$2 billion light rail component. They demand 19 new light rail vehicles for a 1.9-mile extension of an existing line.⁹⁶ TriMet's recent "Better Red" 10-mile light rail extension only added four new light rail vehicles. An unneeded expansion of TriMet's Gresham maintenance facility is also included, which is roughly 10 miles outside the project area. TriMet is replacing 19 worn out light rail cars in this project that will serve their entire light rail system, not the project's proposed 1.9 mile extension of a current line.

This appears to be fraudulent misrepresentation at best. Washington taxpayers should not be footing any of the bill for replacement of 13 percent of TriMet's 145 vehicle light rail fleet, nor paying for any of their maintenance facilities in Gresham. The federal government should not be paying this as part of the IBR funding. The state of Oregon can bail out TriMet with other local funds if they want to do so.

The US Census Bureau reports that people using mass transit to commute to work remains 38 percent below pre pandemic levels. Put another way, 97 of 100 Americans do not use mass transit for daily trips. Both Portland's TriMet and Clark County's C-TRAN report transit ridership is only about half the peak more than a decade ago.⁹⁷

In a 2023 survey conducted by TriMet, 60 percent of people who use the transit system at least several times a week would not recommend the metro area's transit system to a friend or family member. The same survey also found and a majority of TriMet riders in the survey cited other riders' behavior as a reason they feel unsafe while riding.⁹⁸

O'Toole supports a polycentric transportation system. "While TriMet carried 42 percent of downtown workers to and from their jobs in 2018, downtown held less than 10 percent of all jobs in the urban area. Outside of downtown, TriMet carried just 3.4 percent of workers to and from their jobs. Though Portland has been celebrated as "the city that loves transit," the reality is that TriMet provides terrible service to 90 percent of the region's workers and job centers."⁹⁹

He notes Hillsboro had 83,000 jobs, Beaverton had 64,000 and Gresham more than 37,000. Downtown Portland currently has the highest office vacancy rate in the nation.¹⁰⁰ O'Toole recommends a nine-hub system with up to five buses per hour. It would cost no more than TriMet is spending on bus operations. Furthermore, "average bus speeds would nearly double, and speeds between hubs would be nearly triple light-rail speeds, thus attracting far more riders than TriMet is carrying today."

⁹⁶ TriMet Gresham MX facility part of IBR

<https://www.clarkcountytoday.com/news/trimet-gresham-maintenance-facility-expansion-part-of-ibr/>

⁹⁷ Transit Ridership Down Nationally and Locally

<https://www.clarkcountytoday.com/news/national-and-local-transit-ridership-down-significantly-feds-report/>

⁹⁸ TriMet Unsafe <https://www.kptv.com/2024/05/20/be-seen-be-heard-portland-is-trimet-safe/>

⁹⁹ Randall O'Toole <https://cascadepolicy.org/reports/press-release-trimet-in-the-twenty-first-century/>

¹⁰⁰ Downtown Portland has highest office vacancy rate [Downtown Portland's office vacancy rate is highest in the nation. report says - oregonlive.com](https://www.oregonlive.com/news/downtown-portland-office-vacancy-rate-is-highest-in-the-nation-report-says-oregonlive.com)

In 2019, both Governors Inslee and Brown promised to be “data driven” when signing their memorandum restarting the project.¹⁰¹ A month later, Oregon and Washington legislators were provided with a host of data laying out the issues, and showing what needs to be done to reduce traffic congestion and save people time.¹⁰²

Voters also don’t want tolling as a means of funding either the IBR or on Oregon freeways. Currently, Oregon citizens are collecting signatures for IP-4 (now IP-31), which will require a Vote Before Tolls can be placed on any Oregon road.¹⁰³ This was expected to be on the November 2024 ballot until Oregon Governor Tina Kotek issued an Executive Order prohibiting ODOT from collecting tolls until at least January 2026.¹⁰⁴ In March, the Governor canceled the RMPP tolling and paused everything else except IBR tolling discussions¹⁰⁵.

The IBR incorrectly discounted the option of an immersed tube tunnel as a possible alternative. Engineer Bob Ortblad revealed the IBR over-estimated the amount of dredging required by a factor of four. The IBR said they would need to remove almost 8 million cubic feet of materials and dredge to a depth of 80 feet. Ortblad’s calculations indicate at most 2 million cubic feet of dredging material and a depth of only 45 feet.

Portland economist Joe Cortright notes the IBR is using the least accurate traffic forecast, of three they have on record. “IBR relies on Metro’s Kate Model, which has an error factor of 14.5 percent and which over-estimates I-5 traffic by almost 20 percent.

IBR’s DSEIS makes no mention of the Stantec Level 2 forecast (with an error factor of 2.5 percent), or the CDM Smith Investment Grade Forecast (with an error factor of 0.8 to 2.5 percent)¹⁰⁶.”

Improper consideration of various alternatives should disqualify the project from federal funding consideration. Allowing grossly inflated transit ridership numbers (30 to 50 fold) should disqualify the project from consideration, and speaks to the lack of professionalism of project leaders.

¹⁰¹ Governor’s sign Memorandum of Intent

<https://www.clarkcountytoday.com/news/governors-of-oregon-and-washington-sign-agreement-over-interstate-5-bridge-replacement/>

¹⁰² A Data Driven Solution to OR & WA legislators

<https://apps.oregonlegislature.gov/liz/201911/Downloads/CommitteeMeetingDocument/208569>

¹⁰³ Vote Before Tolls <https://votebeforetolls.org/>

¹⁰⁴ Willamette Week Gov. Pauses Tolling [Kotek Makes It Official: She’s Ordered ODOT to Pause Tolling Until 2026 \(wweek.com\)](https://www.wweek.com/news/oregon-gov-kotek-kills-i-5-i-205-per-mile-tolling-but-proposed-i-5-bridge-tolls-remain/)

¹⁰⁵ Koteck cancels per mile tolls

<https://www.clarkcountytoday.com/news/oregon-gov-kotek-kills-i-5-i-205-per-mile-tolling-but-proposed-i-5-bridge-tolls-remain/>

¹⁰⁶ IBR’s DSEIS uses least accurate forecast

<https://cityobservatory.org/ibrs-dseis-uses-the-least-accurate-forecast/>

In 2014, the region was offered a “fixed price” bridge over the Columbia River east of the I-205 bridge for \$860 million.¹⁰⁷ This demonstrated that a cost effective bridge could be built, saving taxpayer dollars and adding vehicle capacity over the river. Transportation architect Kevin Peterson estimated a 3rd bridge would reduce I-205 congestion by 15-20 percent.

The current bridge structures could be repurposed as a “local” connection, for slower moving vehicles and serve as a “collector distributor” envisioned in FHWA requirements. It would allow for a nearly level structure (compared to the much higher IBR LPA) for pedestrians, bicyclists, and transit. This would save roughly \$200 million or more for the demolition and dismantling of the historic bridge structures.

Either an “express” bridge over the river or an ITT would add vehicle capacity to the I-5 corridor. That added capacity would reduce traffic congestion. A third bridge west of I-5 would add capacity, remove many freight haulers from the current bridge, and provide flexibility and redundancy. Portland has a dozen bridges over the Willamette River. We need more than two bridges over the Columbia River in the Portland-Vancouver metro area.

The IBR’s Greg Johnson says “you cannot build your way out of traffic congestion.” You certainly won’t if you’re refusing to try. ODOT proved him wrong by eliminating four hours of congestion on I-5 south of Portland simply by adding an auxiliary lane from OR 217 to I-205.

ODOT was proposing to add one lane to I-205 for a 7-mile stretch of the freeway. They project it will reduce traffic congestion from 14 hours a day to just 2 hours a day, as part of their Abernethy Bridge I-205 project¹⁰⁸. Sadly, ODOT’s inability to manage transportation project costs has caused them to either pause or cancel multiple Portland area transportation projects, including the 7 miles of new freeway lanes on I-205.¹⁰⁹

WSDOT just proved Johnson wrong as well. The addition of one new lane eastbound on SR-14 and two lanes westbound, has eliminated traffic congestion on a 2-mile section of this state highway in Vancouver.¹¹⁰

For roughly 50 years, over 20 reasonable ideas have been proposed for new crossings of the Columbia River according to local citizen Chuck Green. *“The I-205 Bridge was opened almost 40 years ago. Since that time: Clark County’s population has grown 261 percent.*

¹⁰⁷ East County Bridge <https://eastcountybridge.com/proposal/>

¹⁰⁸ ODOT I-205 tolling effort moves forward <https://www.clarkcountytoday.com/news/odot-i-205-tolling-effort-moves-forward-projecting-a-12-hour-reduction-in-traffic-congestion-by-2045/>

¹⁰⁹ ODOT Indefinitely Pauses I-205 Projects [OR tolling: I-205 Improvements Project indefinitely paused \(koin.com\)](https://www.koin.com/news/odot-i-205-improvements-project-indefinitely-paused)

¹¹⁰ SR-14 lane addition eliminates traffic congestion <https://www.clarkcountytoday.com/news/sr-14-lane-addition-eliminates-traffic-congestion/>

*Cross-Columbia River vehicle traffic has grown 239 percent. Cross-River Transportation Capacity has grown 0 percent.*¹¹¹

In summary, the IBR is far too expensive with an unknown cost increase to be revealed in a year. It fails to fix the one problem people want solved – saving time and reducing traffic congestion. After spending more than \$7.5 billion, people will waste at least an additional 30 minutes being stuck in traffic congestion each morning. That would add 125 hours a year of lost time for hard-working citizens.

The proposal is “a bridge too low”, failing to meet the current let alone future needs of our maritime industry. The Coast Guard demands a bridge at least 62 feet higher. The IBR wastes one quarter of the money on a light rail extension that cannot carry enough people and travels too slow. Voters have rejected it multiple times. Why spend \$7.5 billion on the IBR when \$1 billion (perhaps \$2 billion with current inflation) would do. (The Hood River bridge replacement over the Columbia River was \$520 million).

Project leaders are misleading the community regarding multiple aspects of the project and disregarding legitimate transportation needs. It’s been over 40 years since new vehicle capacity and transportation corridors were added to the region. Let’s not waste valuable federal dollars on a project that does nothing to help the average citizen.

What is needed are new bridges and transportation corridors as part of a polycentric transportation system. Portland has a dozen bridges over the Willamette River. We need more than two bridges over the Columbia River. This is the only way to reduce traffic congestion and improve freight mobility.

Every major city in the world has numerous “ring roads” for traffic to bypass the crowded inner core. That practical logic must be applied to the Portland metro area. Serve the people and deliver legitimate value for taxpayer dollars by demanding the two new bridges over the Columbia River identified multiple times over the past 30-50 years. Most recently, the Regional Transportation Council “Visioning Study” (2008) identified the need for two additional bridges over the Columbia River, connecting Portland and Vancouver¹¹².

“Interstate freeways, classified as divided principal arterials, are designed to provide for the highest degree of mobility of large volumes of long-distance traffic,” according to a Regional Transportation Plan. “Collector facilities generally provide equal emphasis upon mobility and land use accessibility.”

¹¹¹ Clark County Today - Chuck Green ideas ignored for crossings
<https://www.clarkcountytoday.com/news/how-many-ideas-have-been-proposed-over-the-years-for-multiple-crossings-of-the-columbia-river/>

¹¹² Interstate Bridge reached peak capacity in early 1990’s
<https://www.clarkcountytoday.com/news/interstate-bridge-reached-peak-capacity-in-early%e2%80%901990s-and-the-glenn-jackson-bridge-did-so-in-the-mid%e2%80%902000s/>

Peak lane usage on the I-5 Interstate Bridge is between 4,000 and 5,500 vehicles per hour on an over congested freeway. The I-205 Glenn Jackson Bridge can handle between 6,000 and 7,200 vehicles per hour because it has four lanes each direction instead of three lanes.

An average lane handles about 2,000 vehicles per hour at freeway speeds. Due to congestion, the Interstate Bridge carries at least 1,000 fewer vehicles due to traffic. The Glenn Jackson bridge handles 800 to 2,000 fewer vehicles at peak travel times.

Mr. Secretary as you said, saving time is people's most valuable commodity. Let's fund a project which actually delivers exactly that, not the current proposed Interstate Bridge Replacement project. The Locally Preferred Alternative is actually not "preferred" by average citizens, but special interests with political ties.

Please stop funding any aspect of the current IBR. There is no value for hard-working citizens on both sides of the Columbia River.

Sincerely,

John Ley
Concerned citizen
8500 NE Hazel Dell #H4
Vancouver, WA 98665

CC: Oregon Gov. Tina Kotek
Washington Gov. Jay Inslee
Greg Johnson – IBR Administrator