



**PORTLAND BUSINESS
ALLIANCE**
Leading the way

December 30, 2005

Mr. Hal Dengerink
Co-Chair
Columbia River Crossing Task Force
700 Washington Street
Vancouver, WA 98660

Mr. Henry Hewitt
Co-Chair
Columbia River Crossing Task Force
700 Washington Street
Vancouver, WA 98660

Dear Mr. Dengerink and Mr. Hewitt,

On behalf of the Portland Business Alliance Transportation Committee, we would like to offer the following comments on the DRAFT Evaluation Framework dated November 23, 2005. The bulk of our comments will focus on Step B: Component Screening Criteria and Measures.

Before delving into our substantive comments, we wish to take this opportunity to provide some context about the relationship between transportation infrastructure investments and our regional economy and livability. The Portland Business Alliance, Metro, Port of Portland, ODOT, and many other public and private sector partners recently completed a study entitled "The Cost of Congestion to the Economy of the Portland Region." While the study was not focused on any specific project, it provides key information about the importance of investing in our transportation system, particularly our roads and highways.

The study finds that geography and past investments have made the Portland region a sea and air gateway, as well as a regional rail and highway hub. As a result, Portland's competitiveness is heavily dependent on an efficient and reliable transportation system. However, even with planned improvements, our transportation system will not keep pace with projected increases in freight and general traffic.

Business interviews conducted as part of the study reveal that congestion is already impacting business competitiveness. Further, although all modes are important to an efficient transportation system, few alternatives exist to a smoothly functioning road and highway system for the movement of good and services, service and sales calls and other on-the-clock business travel.

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The study finds that failing to adequately invest in our transportation system will result in a potential loss to the regional economy of \$844 million annually by year 2025 – that's \$782 per household and 6,500 permanent jobs. Additional investment in the regional transportation system would provide a return of at least \$2 for every dollar spent.

The "Cost of Congestion" study highlights the importance of our transportation infrastructure to our region's businesses and overall competitiveness. Because this region is uniquely trade dependent, it is critical to our economy, and therefore our quality of life, that we adequately invest in improvements that ensure an efficient and reliable transportation system. With that as context, we offer the following comments on the DRAFT Evaluation Framework.

Comments/suggestions on Step B: Component Screening Criteria and Measures:

1. Community Livability

1.8 Support *local* comprehensive plans

Comment: We believe it would be beneficial to further define the word *local*. Our understanding is that some neighborhood plans are recognized by their respective city's comprehensive plans while others are not. While it is important to consider neighborhoods that are most heavily impacted within the bridge influence area, this project is regional in scope and should remain focused on our shared regional vision.

Suggested language change: 1.8 Support *regional* and local comprehensive plans

2. Mobility, Reliability, Accessibility, Congestion Reduction and Efficiency

2.5 Potential (on a qualitative scale) for component to increase the level of persons and vehicles crossing Columbia River via I-5 by mode *during the peak period*.

Comment: The majority of component screening measures gauge improvements during all periods, not just during the peak period or midday period. Many freight related businesses have made schedule changes to avoid peak traffic conditions. Therefore, it is important to increase throughput throughout the day not just during the peak period. We understand that CRC staff has been working from models with data limited to the peak period but in the near term may have access to models with more expanded data.

Suggested language: 2.5 *Delete 'during the peak period'*

3. Modal Choice

3.4 Decrease percentage of *Single Occupancy Vehicle* travel

Comment: Single Occupancy Vehicle (SOV) trips are typically thought of as discretionary or non-business based. However, many of these SOV trips are, in fact, business related. Utility maintenance crews or business people making regional sales calls are seldom in a vehicle defined as a medium or heavy truck (see the discussion below regarding Regional Economy; Freight Mobility) and are therefore classified as an SOV trip. We believe that decreasing the percentage of SOV travel by offering alternatives, such as bus rapid transit or light rail, is a worthy goal. However, it is equally important to recognize the percentage of SOV trips that cannot be accommodated by these alternatives and that these business-related SOV trips are also critical to the regional economy. We hope that this point will be taken into consideration during the alternatives analysis.

5. Regional Economy; Freight Mobility

5.1 Potential (on a qualitative basis) for component to reduce delay for trucks on I-5 through the bridge influence area *during midday periods*

Comment: We strongly support any component that will improve freight mobility within the bridge influence area. However, as described earlier, it is important to measure how each component will reduce delay throughout the day, not just during midday or peak hour periods.

Suggested language: 5.1 **Delete** '*during midday periods*'

5.4 Improve *freight truck* throughput of the bridge influence area.

Comment: Freight truck, for the purposes of this project, is defined as medium (a commercial vehicle under 40,000 lbs and under six tires) and heavy (over 40,000 lbs. and over six tires). This definition excludes smaller delivery and maintenance trucks that also play a role moving freight in and through the I-5 bridge influence area. In addition, as discussed above, business-related SOV trips are also an important part of the regional economy. All of these business-related trips play a role in our regional economy and their role should be adequately taken into consideration during the development and screening of alternatives.

Suggested Addition: 5.5 Maintain or enhance road and rail freight access to Ports and associated transportation facilities

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6. Stewardship of Natural Resources

We support the values reflected by each of these criteria. However, it may be unrealistic to expect that the transportation components will enhance wildlife habitat, endangered fish, plants, wetlands and water quality. We would suggest adding the language "avoid or minimize" to criteria 6.1, 6.2, 6.4, 6.5.

Suggested language:

6.1 *Avoid or minimize* adverse impacts to, or enhance endangered fish or wildlife habitat.

6.2 *Avoid or minimize* adverse impacts to, or enhance other fish or wildlife habitat.

6.4 *Avoid or minimize* adverse impacts to, or enhance wetlands.

6.5 *Avoid or minimize* adverse impacts to, or enhance water quality.

8. Cost Effectiveness and Financial Resources

To the extent possible, funding for various project components should be directly linked to related funding mechanisms.

We appreciate the opportunity to provide comments on this important document.

Sincerely,



Christopher Kopca
Portland Business Alliance
Transportation Committee Chair

cc: Mike Baker, CRC Project Staff