



September 8, 2011

Metro President Hughes  
Metro Councilors Burkholder, Colette, Craddick, Harrington, Hosticka, Roberts  
Metro  
800 NE Grand Avenue  
Portland, OR 97232

RE: Resolution No. 11-4288  
Columbia River Crossing Final Environmental Impact Statement

Dear President Hughes and Metro Councilors:

I submit the following written testimony for your consideration as you deliberate on Resolution No. 11-4288. Also, as provided for in your notice of this meeting, I hereby request that you hold a public hearing on this resolution.

Resolution No. 11-4288 asks you to authorize the Metro President to consent to the Final Environmental Impact Statement (FEIS) for the Columbia River Crossing. I strongly urge you to withhold your consent because the FEIS does not disclose either the true nature of the project as it is likely to be built, nor does it accurately disclose the impacts of this project on the region. Specifically:

1. You do not know what portions of the project will be built, and as a result cannot accurately assess its impacts, because project funding has not been determined.
2. CRC traffic forecasts are wrong, the traffic models used to produce them have been acknowledged by their authors to be incapable of accurately forecasting traffic on tolled facilities, and traffic projections have not been revised since the DEIS to correct acknowledged errors and changes in conditions.
3. Metro has not evaluated the effect that approval of CRC will have on funding for other transportation projects in the region.

Approval of the Final Environmental Impact Statement is a momentous responsibility: It is Metro Council's last opportunity to certify to the citizens of the region that it has fully analyzed, disclosed and considered the project's impact on the region's transportation system, its environment, and the region's communities and people. You have an important duty to assure that this information is accurate, complete and fair.

My analysis shows that the FEIS presents an incomplete, inaccurate and deceptive view of the project's impacts, and therefore you ought to postpone approving this resolution until the information in the FEIS is corrected.

## **1. CRC project financing is highly uncertain, making it impossible to know what will actually be built and therefore what will be the actual environmental, social and land use impacts**

In order to assess the impacts of the project, you have to know what the project is. It is clear from the record that the scale of the project will be adjusted to fit available financing. But as yet, the project's financing is simply conjectural: none of the sources of funding (federal highway earmarks, FTA transit funding, Oregon and Washington gas tax increases, tolls, and a CTRAN sales tax) have been committed to the project. The Governors have directed that the project be phased, and the CRC has indicated that it is planning to break the project into phases, but as yet, no meaningful action has been taken.

It is apparent from the staff report that the financial plan for the CRC is completely unresolved at this point. We have no idea what kind of project will actually be built, so we have no way of accurately assessing its impacts.

It is particularly galling that the resolution, as drafted, makes a claim that is contradicted by the material included in the staff report. The resolution states that Metro has reviewed the FEIS, while the staff report contains material statements from CRC indicating that the financial chapter of the FEIS has not been completed yet. Metro Council cannot, in good faith, adopt a resolution that makes a claim that it has reviewed a document that does not, as of today, even exist. Here are the particulars:

The resolution before you provides:

WHEREAS, since adoption of Resolution No. 11-4280, the Final Environmental Impact Statement has been reviewed and is consistent with the goals and policies of Metro; and  
(Metro packet, PDF page 21)

But, if you read the CRC's response to questions in the staff report, you will find that a key component of the FEIS, the financial plan, is still not complete and is being revised:

### **Answers to Questions**

4. Review of the Finance Chapter of the FEIS (incorporate recommendations from

the OST)

The project has incorporated the treasurer's recommendations to reduce financial risk and provide a more conservative finance plan. The updated financial chapter in the FEIS includes a recalibrated tolling financial projection to reflect the stalled economic growth and a level debt service. The treasurer's office is currently reviewing the FEIS financial chapters for consistency with his recommendations. The CRC will submit a finance chapter that reflects the treasurer's recommendations and the Federal Transit Administration and Federal Highway Administration will provide final approval of the finance chapter for FEIS publication.

(Staff Report, PDF page 30)

Metro should not adopt a resolution today that claims to have reviewed a document—the financial plan—that has not according to the record been completed yet. Moreover, Metro should not vote to add its endorsement to a “Final” Environmental Impact Statement that has not been completed yet.

The CRC depends on a complex, multi-part financing plan. None of the parts of the plan have yet been approved by any of the bodies that must approve such funding. There are four key elements to this financing plan: toll bonds, Oregon and Washington appropriations, federal New Starts funding, and federal highway funding.

The CRC financing plan rests on seven key assumptions about decisions that will be made and amounts that will be provided for project funding:

1. Washington legislative approval of facility tolling.
2. Washington legislative approval of funding for the state share of the project.
3. Oregon legislative approval of funding for the state share of the project.
4. Earmarking or Federal Highway Administration approval of funding for the highway portion of the project.
5. Federal Transit Administration approval of New Starts Funding
6. Oregon and Washington Treasurers' approvals for the authorization of toll-backed revenue bonds
7. Voter approval in the CTRAN district or a portion thereof of operating funds for light rail.

In order to construct the project as currently described by the Project Sponsors Council, all of these financial approvals must be made, and made at the full amount budgeted. If any of these sources of funds or approvals is not made, or if funding is provided at less than the budgeted amount or if funding or approval is delayed, there is no assurance that all of the component parts of the project will be constructed.

There are major risks that one or several of these assumptions are incorrect and that expected sources of funding will not materialize, and additional risks that they will not materialize in the amounts budgeted or on the schedule currently planned.

In addition, it now seems certain that the project will need to be broken into a series of separate phases. The timing and the ultimate scope of the Columbia River Crossing project will depend upon the amount of funds received for project construction. There is no assurance at this time that any given component of the project will be completed.

At the present time, it is highly likely that funding will not be available to construct the entire project as described. Acknowledging this fact, on July 20 of this year, Governor John Kitzhaber directed CRC to develop a “sequencing” plan for the project (Kitzhaber 2011):

The Treasurer also identified potential replacement revenue strategies, which I appreciate and am willing to explore. But I believe that if we are going to get the CRC done, it is time to start planning for a project that adapts to the available resources and fits into today’s economic reality. To that end, I am going to ask the Oregon Department of Transportation and the CRC to prepare a sequencing plan that accommodates anticipated cash flow.  
(Kitzhaber 2011)

The need to sequence or phase the project to fit available funding is likely to result in major changes to the project’s scope, timing and ultimate impacts. More than a year ago, the Independent Review Panel appointed by then-Governor Kulongoski and Governor Gregoire concluded that the project would need to be broken into phases because of the low likelihood of all of the projected funding materializing. The IRP recommended the project be broken into three phases each of 1 to \$1.5 billion (Independent Review Panel 2010, page 186). The IRP is particularly significant because the Directors of the Oregon and Washington Department’s of Transportation both said that they accepted the report and agreed to implement its findings (Garrett and Hammond 2010). The IRP also recommended that phases be constructed to be independent and self-standing, so that the project would be functional regardless of whether funding for subsequent phases was ever realized.

The IRP warned that there may not enough money to complete the whole project and that it ought to be designed so that it could be built in phases, and that if subsequent funding did not become available—which it specifically identified as a possibility—that the project would be functional.

There is a possibility that despite best efforts to assemble funding, the Project Sponsors may encounter a significant shortfall in funding to complete all of CRC as currently envisioned. There is also a possibility that a number of current uncertainties in design and schedule will adversely affect the total cost of the project. Projects of this size and scope are often planned and developed assuming

a phased construction effort. Phasing (as opposed to staging) refers to the completion of some major portion of a total project, with such completion having meaningful value, yet deferring subsequent construction till later, often uncertain, dates when additional funding can be obtained.  
Independent Review Panel 2010, Page 185

Because the project will be phased or sequenced, and that phasing plan has not even been presented, much less adopted, Metro Council has no assurance as to what portion of the project will actually be built. Because the project consists of a diverse array of components, some of which increase traffic (new bridge lanes, new intersection capacity), and others which reduce or divert it (light rail transit, tolling), not knowing which phases will actually be built means that Metro has no idea what will be the net environmental, economic and social impacts of this project.

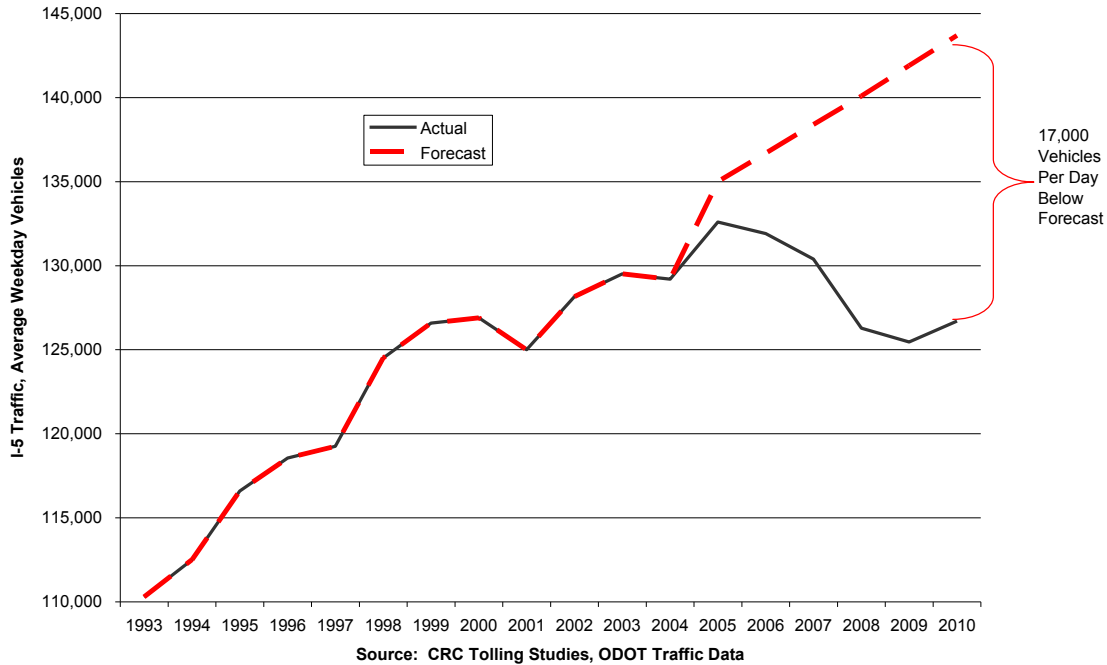
## **2. CRC traffic and toll revenue forecasts are inaccurate, meaning traffic and traffic related impacts are not accurately assessed.**

Assessing the environmental, social and land use impacts of the Columbia River Crossing project depends on accurate estimates of future traffic levels. The FEIS purports to offer very detailed estimates of traffic flows across the I-5 bridge and related roadways, through the year 2030.

The traffic and toll revenue forecasts prepared for the Columbia River Crossing are not accurate. The original forecasts were prepared based on 2005 base year data, and were published in 2007, and incorporated in the May 2008, Draft Environmental Impact Statement. The Columbia River Crossing has not produced new forecasts of travel since that time.

**Actual traffic data show that CRC traffic projections are wrong.** The CRC projections are that traffic on the I-5 bridges should have reached 143,700 vehicles per day in 2010. Actual traffic levels were 126,700 vehicles per day in 2010, 17,000 vehicles per day below the CRC forecast. These figures are based on our analysis of ODOT's data on traffic levels on I-5, through November 2010.

### CRC Forecast v. Actual



In addition, the question is not merely whether traffic is increasing again now, but whether they will recover to the previous levels, and whether they will grow at anything close to the rate CRC projected in the DEIS. The evidence shows the growth rate is much slower than forecast, raising serious questions about the project's financial viability.

**The Treasurer's independent review of the traffic forecasts confirmed the flaws in CRC traffic forecasts.** In 2011, the Oregon State Treasurer retained Robert Bain of RB Consult to review the CRC finance plan and traffic projections. Bain concluded that:

- Traffic and revenue analyses prepare for the CRC were unsuitable for credit analysis
- CRC traffic projections were confusing and outdated
- Authors of the traffic projections failed to examine historical data or verify their models against actual trends
- Diversion estimates to I-205 were “worrying.”
- Overall, the CRC appears to have overestimated traffic.
- Toll revenue appears to be over-estimated by 25 percent.

(Bain 2011)

**Both ODOT and CRC consultants have concluded that the models used to estimate CRC traffic do not produce valid, accurate estimates of traffic for tolled facilities.**

In February 2009, the Oregon Department of Transportation received a report prepared by Parsons Brinckerhoff, David Evans and Associates Inc., and Stantec Consulting Services Inc. The authors of this report all happen to be contractors for the Columbia River Crossing project. The report is entitled *Tolling White Paper 3: Travel Demand Model Sufficiency*. This document is available on the Internet at the following address: <http://www.oregon.gov/ODOT/TD/TP/docs/LRPU/twp3.pdf>

ODOT's report finds that the current models used to forecast traffic in Oregon, and specifically in the Portland Metropolitan Area, including the Metro model, are inadequate to accurately predict traffic volumes on tolled facilities, such as the proposed Columbia River Crossing. Consider ODOT's summary of this report:

Existing models in Oregon are rated as excellent for the purposes they were designed, and some are internationally recognized. However, Oregon models have not been specifically designed to evaluate toll projects, so **planners are not able to confidently forecast travel patterns for projects that are considering tolling/pricing. Existing models are not able to determine how travelers would change their mode, route, travel time, or destination in response to tolling/pricing.**

Oregon Department of Transportation, Tolling and Travel Demand Model Sufficiency, Highlights of Tolling White Paper 3, March 2009, page 1, [http://www.oregon.gov/ODOT/TD/TP/docs/LRPU/Highlight3.pdf#Tolling\\_White\\_Paper\\_3](http://www.oregon.gov/ODOT/TD/TP/docs/LRPU/Highlight3.pdf#Tolling_White_Paper_3)  
(Emphasis added)

As the ODOT study shows, the Oregon Department of Transportation and the principal contractors for the Columbia River Crossing concur that the traffic forecasting methods used by the CRC are not accurate or reliable. Accurate estimates of future traffic levels are central to assessing the need for this project, justifying its size, evaluating its environmental impacts, and most crucially, determining the viability of its financial plan.

**The recession does not explain the decline in I-5 traffic, and in any case, CRC has not revised its traffic projections or impact analysis to reflect the much slower rate of growth.** It has been claimed that the decline in traffic since 2005 is attributable to the economic recession which began in December 2007. The current staff report alludes to this same argument, claiming that the traffic projections and financial documents need to be "recalibrated to reflect stalled economic growth." (Staff report, PDF page 30). Robert Bain, the consultant to the Oregon State Treasurer conclusively disposed of this argument in his report:

Traffic volumes using the I-5 Bridge have flattened-off over the last 15-20 years; well before the current recessionary period. This is highlighted by the red dotted trend line in the chart below which was estimated up to and including the year 2006 (i.e. it omits the recent 2007 – 2010 period characterised by fuel price hikes

and economic recession). The clear inference is that the flattening-off is a long-term traffic trend; not simply a manifestation of recent circumstances.  
(Bain 2011, page 3)

And even though CRC financial plans now concede that DEIS projections are wrong, the traffic estimates in the FEIS—which form the basis of the claims about the project’s environmental, social, traffic and economic impacts—have not been revised to reflect this new reality—they are essentially the same traffic figures given in the DEIS.

Most of the impact analysis in the FEIS is based, directly or indirectly, on comparisons of traffic levels between the no-build alternative and the proposed project, and these traffic level estimates are drawn from data that has been shown to be wrong, from models that are not even designed forecast traffic for tolled facilities like the CRC, and which have not been updated to reflect the acknowledged changes that have occurred since the DEIS was published. Consequently, the FEIS does not constitute a fair and reasonable analysis or disclosure of the environmental, social, and economic impacts of the CRC.

### **3. The FEIS contains no analysis of impacts resulting from CRC funding sources that reduce resources for other regional priorities.**

Metro has been appropriately concerned that the Columbia River Crossing will compete for funding that would otherwise come to the region either through federal formula fund allocations or through state funding.

A cornerstone of the CRC finance plan is the claim that \$400 million will be available from the federal government as a result of an earmark or other discretionary funding, over and above funding that would otherwise come to the region, because of the alleged special character of this project. (The latest version of the plan actually assumes a \$500 earmark in some scenarios).

For years, CRC advocates have traded on the idea that the CRC is a special project that will get funding from "a special pot" that wouldn't otherwise be available to the region, and that it wouldn't compete for dollars that could go to other projects, like federal formula funds. For example, earlier this year, Matt Garrett, ODOT director said:

“Federal highway funds are being sought from a category known as Projects of National Significance. Very few projects in the country and no other projects in the region can compete for these funds . . . . These sources are unique to the CRC project and do not affect other Oregon projects.”

Notice in particular three things about Mr. Garrett’s statements. First, the passive voice

and indefinite form “funds will be sought.” Second, Mr. Garrett is silent on what would happen if these discretionary funds either aren’t available, or fall short of the amounts being “sought.” And third, Mr. Garrett in no way rules out seeking funding for CRC from other sources.

The just released FEIS Financial Plan, however, opens the door to using funding the CRC using federal formula allocations that are available for a wide range of projects in the region and the state. The financial plan tries to downplay the likelihood that these funds will be used.

"Federal Revenue and Financing Options"

### **Federal Formula Funds**

ODOT, WSDOT, C-TRAN, TriMet, Portland’s Metro Regional Government (Metro), and the Southwest Washington Regional Transportation Council (RTC) receive transportation funding from a variety of federal formula grant programs. In an urban area, the metropolitan planning organizations (MPOs) program these funds to specific eligible uses. In the Portland-Vancouver region, this is accomplished through Metro’s or RTC’s Metropolitan Transportation Improvement Program (MTIP) processes. State and federal funds are also programmed in ODOT’s and WSDOT’s State Transportation Improvement Programs (STIPs). While federal formula funds potentially could be used for the CRC project, many of these funds are currently programmed for other uses, and the finance plan for the CRC project does not anticipate reprogramming of these funds.  
(Final Environmental Impact Statement, Finance Plan, Section 4.3.1, page 4-7)

While this wording makes it sound like CRC won't get formula funds, a careful reading shows that it says almost the opposite. While it says "many funds are currently programmed" and CRC "does not anticipate reprogramming **these** funds," like Mr. Garrett it is silent on what happens if an earmark or discretionary funds are not available. The operative words here are “federal formula funds” and “could be used for the CRC project.”

What this statement means is that CRC won't seek to reprogram currently programmed funds, but they could easily ask for future and as yet un-programmed formula funding. The FEIS financial specifically identifies nine categories of formula funds that could be used to pay for the CRC, including:

- National Highway System funds (NHS)
- Surface Transportation Program Funds (STP)
- Interstate Maintenance Funds (IM)
- Fixed Guideway Modernization Funds (Section 5309)
- National Highway Traffic Safety grants (NTSA)
- Congestion Mitigation Air Quality funds (CMAQ)
- Urbanized Area Formula Grants (Section 5307)

- Job Access and Reverse Commute Funds (JARC)
- New Freedom Funds

(Final Environmental Impact Statement, Financial Plan, page 4-5 to 4-6)

And CRC fully anticipates seeking additional funds. The wording of the FEIS Financial Plan makes it clear that everything about the plan is effectively hypothetical, and will change later.

As stated earlier, the financial plan scenarios discussed above are illustrative of the financial tradeoffs between the alternatives. The finance plan will be refined during final design, and the final plan may differ from the scenarios discussed above.

(Final Environmental Impact Statement, Financial Plan, page 4-18)

The current illustrative financial plan scenarios are valid if, and only if, the CRC could obtain a \$400 million to \$500 million earmark or discretionary allocation. That was always at best just a speculation. Recent developments in Washington DC make it clear that it is a virtual impossibility.

As I noted in my August 11 testimony, neither the Senate nor the House draft reauthorization bills contain any category of "projects of national or regional significance." And both drafts ban earmarks. Representative Mica has made it clear he wants to consolidate categories, and give more discretion to the states. Senator Boxer's bill has a so-called national freight provision, but that money is allocated to the states by formula (and wouldn't represent any overall increase in highway funding above current levels). Under either of these bills, formula funds are all this region is likely to get from the federal government for the foreseeable future.

At your hearing on the Land Use Final Order last month, ODOT Director Matt Garrett conceded there was currently no evidence that there would be any such funding available as part of the transportation reauthorization process:

We thought there might be a specific project of national significance. At least with the language we have right now, the discretionary money is not really clear where that's going to present itself.

Matt Garret, Metro LUFO Hearing August 11, 2011

More recently, Peter DeFazio, a key legislator, whose support is vital to any federal funding, has repeatedly expressed his dismay about the size and cost of the CRC. On August 7, DeFazio told the Associated Press that the outlook for funding for the Columbia River Crossing is now "very, very, very, very grim." (Fought and Cooper 2011).

In the Oregonian on August 14, DeFazio said:

"I kept on telling the project to keep the costs down, don't build a gold-plated project," a clearly frustrated DeFazio said. "How can you have a \$4 billion project? They let the engineers loose, told them to solve all the region's infrastructure problems in one fell swoop... They need to get it all straight and come up with a viable project, a viable financing plan that can withstand a vigorous review."

(Manning, Jeff. "Columbia River Crossing could be a casualty of the federal budget crunch", The Oregonian, August 14, 2011).

Later, DeFazio told Oregon Public Broadcasting:

"I said, how can it cost three or four billion bucks to go across the Columbia River? . . . Now with the proposed Republican cuts in transportation . . . they want to cut this [transportation spending] by 35 percent, that means minimally we lose 600,000 to a million jobs and projects like this don't go forward. . . . Right now it's very problematic. . . . The Columbia River Crossing problem was thrown out to engineers, it wasn't overseen: they said solve all the problems in this twelve-mile corridor and they did it in a big engineering way, and not in an appropriate way.

"Think Out Loud," Oregon Public Broadcasting, August 18, 2011.

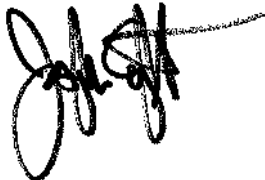
Federal transportation funding faces major cutbacks. There are no earmarks or projects of national significance. As a result, CRC's funding strategy is tantamount to "bait and switch": advocates tell everyone that the federal money for the CRC will come from a "special pot" of earmarks that won't compete with other local projects, and but it should be increasingly clear that when this doesn't materialize, they will seek funding from all of the other sources of funds listed in the FEIS.

When they do, this will reduce the amount of money available for other projects in the region. Because the CRC is such a large project with a high risk of cost overruns, and because it faces revenue shortfalls from other funding sources, it would likely be a drain on the region's transportation financing capacity the next decade. Indeed, the recently released project schedule—which does not include phasing—extends the construction period to 2023. Metro has done nothing to examine the impacts on the region of the diversion of formula funds and other resources to the CRC. Until it examines these impacts, it should not assent to the Final Environmental Impact Statement.

The purpose of the National Environmental Policy Act is to assure citizens that all of the important economic, social, and environmental impacts of investment and policy decisions are carefully assessed and fully disclosed *before* the decisions are made. The version of the Final Environmental Impact Statement before you today falls far short of meeting that standard. Because of acknowledged funding uncertainties, and an abject failure to develop a phasing plan that everyone acknowledges will be needed, you really have no idea what project will actually be built, and therefore no way to assess its impacts. The project's traffic projections—which are utterly central to most of the key claims about the project's environmental, energy, social and traffic effects—are not only simply and demonstrably wrong, they are based on a model that the project's sponsors and consultants have acknowledged is incapable of accurately predicting traffic levels on tolled facilities. And despite acknowledging that their projections are wrong, CRC advocates have made essentially no changes to the traffic figures presented years ago in the DEIS. Finally, it is apparent the prospects for a massive \$400 million to \$500 million earmark for this project, which were always at best speculative, are now virtually impossible. The financial element of the FEIS is not even available in final form, and even then it not really a plan, but rather an “illustrative scenario”—as the project sponsors concede in a candid moment. And when this illustrative scenario of generous federal funding from a new and separate pot evaporates, the CRC will clearly be a major competitor for regional transportation funds from federal formula allocations and other sources, reducing resources available for other badly needed regional priorities—and neither this FEIS nor Metro have considered the considerable impacts of that outcome.

The Columbia River Crossing Final Environmental Impact Statement fails to accurately assess these important impacts and disclose their consequences to the people of the region. Metro Council should reject this resolution, and insist that these issues be addressed.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Joseph Cortright', with a long horizontal line extending to the right from the end of the signature.

Joseph Cortright

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