

Dear Metro,

The Interstate Bridge Replacement Program is excited to be nearing the release of the Draft Supplemental Environmental Impact Statement (SEIS). This will afford the public the opportunity to review and comment on the analysis of potential impacts and mitigations of the Modified Locally Preferred Alternative (LPA).

Metro's resolution adopting the Modified LPA in July 2022 reflected the hard work of regional elected officials, as well as local jurisdictional leadership. Not everyone got exactly what they wanted in the Modified LPA, but all got what is needed: a path forward to a new bridge that will keep our region connected for a century to come. Between the eight jurisdictions endorsing the Modified LPA we received 175 conditions in total. In addition to your endorsement, Metro attached 41 conditions. We provided a response to 36 of your conditions in prior correspondence. We have been coordinating with others in the region to address your five remaining conditions related to greenhouse gas (GHG)/vehicle miles traveled (VMT) and additional transit measures.

Attachment A outlines how the program is addressing your remaining conditions.

We will continue to work with Metro staff, as the program progresses, to ensure the implementation of the commitments made by the program in response to your conditions.

Thank you for participation in the Modified LPA endorsement and conditions process. I'd like to also thank you for your ongoing commitment to this regional effort to replace the bridge and keep the economy of the region strong.

Sincerely,

Greg Johnson  
IBR Program Administrator

## ATTACHMENT A

Agency Name	#	Condition	Response
Metro	1	<p>The IBR program must demonstrate how, with comprehensive variable-rate tolling intentionally designed to manage congestion and repay construction costs and with visionary improvements in transit and active transportation options, it achieves at least a proportionate contribution to the State of Oregon’s greenhouse gas (GHG) goals that call for the state to reduce its GHG emissions (1) at least 45 percent below 1990 emissions levels by 2035; and (2) at least 80 percent below 1990 emissions levels by 2050. The construction of the bridge should use methods that provide the greatest level of sustainability possible.</p>	<p>The IBR program will document the expected contribution to state GHG goals in the NEPA document. The program includes GHG emissions-reducing strategies including provision of high-capacity transit, variable rate tolling, and expansion of multimodal facilities. The project would accelerate progress to state, regional, and local goals. While the NEPA analysis will show the anticipated reduction in GHG and VMT from the program in the Portland Metro Region compared to the No Build in 2045, the state goals and timeline will be included for context. Throughout program development, the IBR program is committed to considering greenhouse gas emissions and climate resiliency and will optimize the use of available advanced materials that meet the performance requirements.</p>
Metro	2	<p>To create baselines, determine the hourly average vehicle miles traveled (VMT) across the bridge in 2022 by mode and use evidence-based methodologies to estimate the GHG by hour in the project area.</p>	<p>The IBR program worked with Metro, project partners, and the USDOT to establish methods for the analysis, which are consistent with other regional planning efforts. The analysis presented in the NEPA document uses 2019 as the base year and 2045 as the build year. The NEPA Draft Supplemental EIS presents estimates of annual GHG resulting from traffic in the region in 2019 and 2045.</p>
Metro	3	<p>Prepare an in-depth analysis of the operations of the bridge, especially as they relate to GHG and the potential for increased vehicle miles traveled through induced automobile demand. The results</p>	<p>The NEPA impact analysis includes evaluation of the impacts associated with operations of the bridge including traffic, transit ridership, air quality, and</p>

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		<p>of the analysis, which should include assumptions regarding tolling consistent with the Oregon Toll Program, must be prominently displayed in the SEIS.</p>	<p>greenhouse gases. The transportation analysis in the Draft SEIS includes sensitivity tests that include tolls assumed as part of the Oregon Toll Program.</p> <p>The Draft SEIS reviews the potential for increased demand resulting from program improvements and found the build alternatives would reduce vehicle miles traveled compared to No Build. The potential for increased vehicle miles traveled created by the IBR improvements is limited by:</p> <ul style="list-style-type: none"> <li>• The high level of land use controls in both Washington and Oregon.</li> <li>• System constraints to the north and south of the IBR improvement area, which limit the ability of auxiliary lanes to act as a major capacity improvement, particularly at a regional level.</li> <li>• The demand for the Modified LPA being served more efficiently than No-Build, with more person-trips but fewer daily vehicles due to the combination of high-capacity transit, tolls, active transportation, and operational and design improvements.</li> </ul> <p>Other means to constrain automobile travel demand include enhanced local efforts to improve access to transportation options such as TOD, decreasing distance between job centers and residential areas, and continued coordination of transit service to improve ridership within the Portland-Vancouver metropolitan area.</p>
Metro	4	Implement a plan with current best practices to reduce GHG during the construction of the	The IBR program is committed to implementing construction practices

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		<p>bridge, including the use of low-carbon materials and adherence to the Oregon Clean Air Construction Program during the construction phase of the project.</p>	<p>that will contribute to reduced GHG. The NEPA document outlines the range of options and contractor requirements to meet these objectives. These include minimizing embodied GHG in construction materials, with considerations to the lifecycle emissions associated with material choices. Where available and consistent with performance requirements of the program, contractors will minimize GHG and diesel exhaust emissions through fuel and equipment choices. These efforts will be consistent with agency policy and applicable regulatory requirements including the Oregon Clean Air Construction Program, Oregon Department of Environmental Quality’s Cleaner Air Oregon program, and the WSDOT Environmental Manual. Contractor requirements will be built into contract specifications and responsive to market availability.</p>
Metro	28	<p>Minimize the width of the shoulders to address needs for transit and emergency use only. Shoulders must not be restriped and/or used to expand travel capacity except during construction or maintenance or for Bus on Shoulder.</p>	<p>Program plans include inside and outside safety shoulders. The safety shoulders will allow for buses to travel on the shoulder, as well as providing emergency, maintenance, and disabled vehicle access. The lane and safety shoulder widths are being designed to DOT standards.</p>