
OREGON DEPARTMENT OF TRANSPORTATION CONCURRENCE ON THE WASHINGTON STATE ENVIRONMENTAL POLICY ACT ADDENDUM

Date: June 18, 2026

To: Ahmer Nizam, Environmental Services Office Director, Washington State Department of Transportation

From: Justin Moderie, Interim IBR Assistant Program Administrator, Oregon Department of Transportation

Subject: Concurrence on the Washington State Environmental Policy Act Addendum

This letter documents the Oregon Department of Transportation's (ODOT) concurrence on the Washington State Environmental Policy Act (SEPA) Addendum prepared for the Interstate Bridge Replacement (IBR) Program. The IBR Program is a collaborative effort between Oregon and Washington to construct a suite of multimodal improvements, including a modern earthquake-resilient bridge across the Columbia River, that will strengthen the connection between these communities.

To comply with federal regulations and Washington State regulations, the IBR Program, in cooperation with its federal and state partners, prepared a combined National Environmental Policy Act (NEPA) and SEPA Draft Supplemental Environmental Impact Statement (SEIS), which updates and refines the analysis presented in the Columbia River Crossing Environmental Impact Statement and Record of Decision. The IBR Program also prepared a NEPA/SEPA Final SEIS that further updates the analysis in response to new information, changes in design, public comments, and changes in federal policy.

Because of changes in federal directives, three topics that were evaluated in the NEPA/SEPA Draft SEIS are not included in the NEPA/SEPA Final SEIS: environmental justice, climate change, and cumulative effects. While these topics are no longer under consideration by federal agencies, ODOT, the Washington State Department of Transportation (WSDOT), and many regional and local partners have policies encouraging evaluation and consideration of these topics when making agency decisions. Therefore, the IBR Program prepared the SEPA Addendum, which updates the analyses of environmental justice, climate change, and cumulative effects that were included in the NEPA/SEPA Draft SEIS. In addition to these analyses, the SEPA Addendum includes avoidance, minimization, and mitigation measures, some of which entail the leadership or cooperation of ODOT.

Although concurrence with the NEPA/SEPA Draft and Final SEIS is documented through ODOT's formal signature on those documents (as a designated NEPA Lead Agency), the SEPA Addendum is not a NEPA document and was not signed by ODOT in its capacity as a NEPA Lead Agency. Although ODOT is not required to concur with the SEPA Addendum, ODOT has chosen to do so in recognition that the IBR Program previously made a commitment to evaluate environmental justice, climate change, and cumulative effects. This letter serves to document ODOT's concurrence on the analysis in the SEPA Addendum.

The SEPA Addendum updates the analysis from the Draft SEIS in the context of Oregon and Washington State environmental and land use policies, as well as in response to new information, changes in design, and public comments, and Washington’s SEPA (Washington Administrative Code [WAC] 197-11) requirements. SEPA is a Washington State requirement; however, the evaluation of environmental justice, climate change, and cumulative effects in the SEPA Addendum considers—and is consistent with—the following state plans, policies, and directives:

- Oregon Environmental Justice Task Force and Oregon Senate Bill 420
- Oregon Department of Environmental Quality Environmental Justice Policy
- Oregon Transportation Plan
- ODOT Strategic Action Plan
- ODOT Climate Adaptation & Resilience Roadmap
- ODOT Statewide Transportation Strategy
- Oregon Governor’s Executive Order 20-04
- Oregon Governor’s Executive Order 25-29
- Oregon Governor’s Executive Order 25-26
- Oregon Department of Land Conservation and Development – Climate-Friendly and Equitable Communities Adopted Amendments to Division 12 (Transportation Planning Rules)
- Oregon Revised Statutes 468A.205

ODOT has coordinated extensively with WSDOT and the IBR Program throughout the development of the NEPA/SEPA SEIS and the SEPA Addendum. This collaboration includes ODOT’s engagement with other relevant state agencies, where appropriate, to ensure a comprehensive and consistent approach to the environmental analysis.

Early in the environmental analysis process, ODOT helped develop the methodology for the environmental justice, climate change, and cumulative effects analysis included in administrative drafts of the NEPA/SEPA Draft SEIS and the supporting technical reports. There was a 60-day public comment period from September 20, 2024, to November 18, 2024, during which time, agencies and the general public had the opportunity to comment on the NEPA/SEPA Draft SEIS.

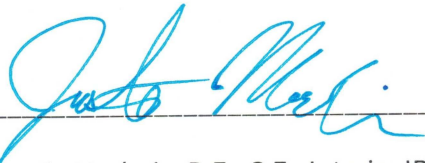
The IBR Program is a joint program between Oregon and Washington, and Program-related decisions by either state affect both states; therefore, during preparation of the SEPA Addendum, ODOT collaborated closely with WSDOT and the IBR Program through a series of coordination meetings to ensure the final document reflects ODOT’s policies regarding environmental justice, climate change, and cumulative effects. Although the SEPA Addendum was prepared within the framework of SEPA, the analysis encompassed the entire Program, including the proposed improvements in Oregon. WSDOT is using the SEPA Addendum to meet their state regulations and policies, particularly SEPA (WAC 197-11), which requires WSDOT to issue a threshold determination based on the environmental analysis prepared for a project. ODOT and WSDOT are relying on the same set of documents and analysis (the NEPA/SEPA Draft and Final SEIS and the SEPA Addendum) to meet IBR Program obligations.

ODOT has conducted a thorough review of the SEPA Addendum and supports its findings and conclusions. As previously noted, ODOT’s concurrence on the NEPA/SEPA Final SEIS is documented through its signature on

that document. ODOT commits to continued coordination with WSDOT and other Program partners to implement and track the avoidance, minimization, and mitigation measures identified in these two documents (see attachment).

ODOT looks forward to the continued collaboration with WSDOT to advance the IBR Program in alignment with shared goals.

Sincerely,



Justin Moderie, P.E., G.E., Interim IBR Assistant Program Administrator, ODOT