

Dear City of Vancouver,

Thank you for your letter of endorsement of the Modified Locally Preferred Alternative (LPA) dated July 2022. The Modified LPA's adoption reflects a great accomplishment due to the hard work of regional elected officials, as well as local jurisdictional leadership over the past year. 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.

In addition to your endorsement, the City attached 33 conditions. Between the eight jurisdictions endorsing the Modified LPA we received 175 conditions in total. The IBR team has reviewed in detail all conditions submitted. The majority of agency conditions were in harmony with others received and many were already included in the program. Responses to these conditions can be found in the document labeled *Attachment A*.

There were some conditions submitted that are contradictory to other agencies' conditions. Additionally, some conditions requested work or components not previously included in the program or have taken longer to adequately address. I have attached a list of seven of the City's conditions largely related to greenhouse gas (GHG)/vehicle miles traveled (VMT) or design issues in *Attachment B*. We will continue to work with City of Vancouver staff to identify a regional approach to these items. Though ESG meetings and the IBR website will keep you apprised of our progress, I will send you another formal response reporting back on how we've successfully addressed the remaining conditions.

Rather than delay my response until every condition has been addressed, I wanted to communicate my gratitude for your endorsement and assure you that your conditions are, and will continue to be, examined. Thank you again for participation in the regional effort to replace the bridge and keep the economy of the region strong through an environmentally-sound and culturally-sensitive replacement structure.

Sincerely,



Greg Johnson  
IBR Program Administrator

## ATTACHMENT A

Agency Name	#	Condition	Response
City of Vancouver	1	Engagement must be accessible and open to a wide variety of stakeholders and all community members.	Accessibility is a core value of the IBR engagement strategy. The program will continue to prioritize two-way engagement opportunities that reach equity priority communities and groups who traditionally do not engage in infrastructure projects. The IBR program website is translated into eight languages, and all materials, videos, and graphics posted to the website are made accessible to people living with limited sight or hearing abilities. The program commits to partnering with community-based organizations, businesses, and neighborhoods at key milestones throughout the process to ensure their members and stakeholders have the information and opportunity to provide meaningful input on program elements and decisions. In addition, the program will be directly engaging with potentially impacted property owners adhering to the WSDOT and ODOT right-of-way procedures.
City of Vancouver	6	The IBR program shall assess the impacts of the Program on Black, Indigenous, and People of Color (BIPOC) communities, low- and moderate-income residents, renters, people with disabilities and mobility challenges, and other equity-priority populations in the region using partner agreed-upon methodologies and data. This analysis should include an assessment of the distribution of program impacts and benefits (as defined by the Program Equity and Mobility Advisory Committee - #18 below), potential outcomes, and mitigations	Part of the SDEIS will include both the Environmental Justice (EJ) analysis as well as an Equity Report. The Equity Report is broader in scope than the EJ analysis and will analyze transportation-related disparities. The Equity Advisory Group (EAG) is actively involved in all phases of the program helping to ensure the program continues to prioritize equity. The EAG will recommend equity-specific performance measures to the program. The mitigations will be identified through the SFEIS with the advisement of the EAG and ESG. The program will regularly

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		for equity priority communities at 2030, 2040, and 2050.	measure and monitor outcomes and report on outcomes as data becomes available.
City of Vancouver	7	Evaluate equitable outcomes using performance measures developed by the IBRP Equity Advisory Group to measure benefits and impacts to equity priority communities (including BIPOC).	Part of the SDEIS will include both the Environmental Justice (EJ) analysis as well as an Equity Report. The Equity Report is broader in scope than the EJ analysis and will analyze transportation-related disparities. The Equity Advisory Group (EAG) is actively involved in all phases of the program helping to ensure the program continues to prioritize equity. The EAG will recommend equity-specific performance measures to the program. The mitigations will be identified through the SFEIS with the advisement of the EAG and ESG.
City of Vancouver	8	Prioritize historically marginalized and underserved communities within the Program area to establish objectives, design, implement, and evaluation of success of the project.	Prioritizing historically marginalized and underserved communities within the program area, as specified, is one of the six equity objectives established in the Equity Framework developed in coordination with the program's Equity Advisory Group (EAG). The dashboard, to ensure implementation of the Equity Framework throughout the program, has been developed in coordination with the EAG. The various program disciplines have begun using the tool to demonstrate how equity is incorporated into key decisions and activities. Results will be shared periodically with program leadership and the EAG.
City of Vancouver	10	Confirm the constraints on bridge design related to navigation and airspace.	The program continues to coordinate with various agencies including the FAA, Corps of Engineers, and United States Coast Guard to confirm constraints.
City of Vancouver	11	The bridge shall have the highest quality architecture for the project allowable by engineering limitations and within	The communities on both sides of the river will be included in development of urban design and architectural guidance. While the

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		reasonable cost to produce a signature design.	bridge architecture is focused on accommodating the safe travel needs of the public, the program has a strong commitment to reflect the desires of the community in aesthetic style.
City of Vancouver	12	The bridge cannot negatively impact City of Vancouver's ability to convert Washington Street to a two-way street or any other future changes to the local road network and related facilities as defined by the City through the design phase of the IBR Program.	The program will continue to coordinate with the City of Vancouver on local street connections. Early communication and coordination between the City and program will be critical to ensuring the program's design reflects City desires for local street connection and operations.
City of Vancouver	13	Safety and Security is a primary objective of the transit system and specific improvements, strategies, and measures should be deployed to ensure maximum security and safety for transit patrons and the adjacent community.	Crime Prevention Through Environmental Design (CPTED) principles are being used to design the transit elements of the program. Before light rail transit service begins as part of the program, safety and security best practices will be analyzed and implemented with partner agencies, where possible.
City of Vancouver	14	All park and ride location(s) within the City of Vancouver will be determined in partnership with the City of Vancouver and C-TRAN, be designed to integrate with the community character and landscape, and not negatively impact multimodal access, safety, and circulation.	The program will continue to work with partners and the community on transit design including potential Park and Ride facilities. In conjunction with the partners, the program will be analyzing if Park and Rides are necessary (in conjunction with other transit elements) to compete for Capital Investment Grant (CIG) funding through the Federal Transit Administration (FTA).
City of Vancouver	16	Active transportation facilities shall be designed to facilitate a comfortable, low stress experience during all seasons and in all types of weather, prioritize safety of vulnerable users and ensure safe and convenient access from the local network to new facilities.	The program has included improved active transportation facilities using best practices for safe and comfortable travel that best meets the needs of all users. This will include designing features that help people walking, biking, and rolling feel safe and comfortable through features such as separation between modes of travel, illumination, wayfinding,

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			and end of trip facilities at transit stations. The program will continue to work with partners to make active transportation connections within the program area.
City of Vancouver	17	Active transportation facilities shall be designed to minimize users' exposure to roadway pollutants such as particulate matter and hazardous chemical compounds.	The program is seeking to minimize the exposure of the active transportation facility-users to roadway pollutants and noise, to the extent that it is feasible.
City of Vancouver	18	More detailed design of interchanges in Vancouver is required to fully evaluate potential community impact, urban development potential, and enhanced access for all users.	More detailed interchange evaluation is a requirement of WSDOT processes and will occur as the program develops. The work regarding the interchanges will strive to incorporate the City's community development goals.
City of Vancouver	19	Interchanges and roadways must be designed with a goal to not impact any properties outside of WSDOT ROW.	The program design attempts to stay within existing right-of-way, where possible. Minimization and mitigation will be used where impacts are unavoidable.
City of Vancouver	20	Preserve and enhance freight access in a manner that is safe, efficient, and does not negatively impact community design or character.	The program is committed to preserve and enhance freight access and movement through the corridor.
City of Vancouver	21	The Program shall further refine scenarios with variable rate tolls on the existing I-5 Bridge.	This will be completed as part of the Level 2 and Level 3 Traffic and Revenue Studies. The Level 2 Traffic and Revenue Study began in mid-2022 with the goal to complete it by mid-2023. The Level 2 Traffic and Revenue Study will test policies and multiple toll-rate scenarios and how they affect demand in the corridor in coordination with OTC and WSTC. The program anticipates completing an Investment Grade Traffic and Revenue Analysis (Level 3 Traffic and Revenue Study) in 2025, which is needed for toll bond financing and must be completed close to the beginning of toll operations to meet the

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			needs of investors. The program will provide OTC and WSTC with information to inform the rate-setting decision, which is not anticipated to occur until 2025 shortly before tolling is estimated to begin on the facility. The soonest tolling would begin on the Interstate Bridge is late 2025/early 2026 – pending legislative authority to toll the facility.
City of Vancouver	23	Freeway access streets should receive additional traffic management as warranted and agreed to by the City.	The program plans on coordinating with the City of Vancouver around traffic management needs throughout program development.
City of Vancouver	24	The bridge river crossing shall be an iconic design, connect the historical and interpretive artifacts and landscape elements, and not harm the landscape or existing archeological or cultural resources.	Potential impacts and benefits to cultural resources, landscapes, etc. will be documented in the SEIS. The communities on both sides of the river will be included in development of urban design and architectural guidance. The bridge architecture cannot supersede the needs for safe and reasonable accommodation of the traveling public within the budgetary and regulatory constraints of the program, but every effort will be made to reflect the desires of the community in aesthetic style, representation of historic and interpretive artifacts and landscape elements while minimizing harm to existing landscaping, archeological and cultural resources.
City of Vancouver	25	Recreational and open space design shall be determined in collaboration with Program partners and the community.	Conversations with partner agencies and the community will continue regarding uses of remaining open spaces.
City of Vancouver	26	The bridge design shall improve the existing user experience in downtown Vancouver, accounting for the health, safety, and welfare of the general public. In circumstances where nuisances are reasonably expected from the project	The program is following the NEPA process. The program will aim to avoid impacts, minimize unavoidable impacts, and seek opportunities to mitigate adverse impacts, where feasible. The SEIS will include mitigation for potential adverse impacts, where feasible, including those impacts to

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		design, impacts will be mitigated to the maximum extent practicable.	human health, safety and welfare of the general public.
City of Vancouver	27	Community connections shall be designed to connect the historical and cultural landscape elements. These include but are not limited to a lid over I-5 connecting Downtown to the Historic Reserve, extension of Main Street, and redevelopment or re-use of land unencumbered by physical structure for the bridge itself or supporting water treatment facilities (5th Street to north bank of the Columbia River).	The program team is already investigating some of these elements (such as the freeway cap) where possible, practical, and within the scope of the program. The Main Street extension is included in the current program design. Conversations with partner agencies and the community will continue regarding uses of any remaining open spaces.
City of Vancouver	28	The IBR program shall provide the highest model of environmentally and socially friendly design and construction for a bridge of its proposed size and scale. Temporary screening of construction and staging areas will be aesthetically appealing and help tell the story of the bridge and community.	Environmentally- and socially- friendly design are goals. Temporary screening is one of the tools the program will use during construction to be sensitive to adjacent businesses and individuals. It is anticipated that considerable public involvement efforts will be undertaken by the program to represent the community and history of the project area.
City of Vancouver	29	The Program must respect properties outside of WSDOT ROW and have a goal to avoid both short- and long-term impacts to those properties during and after construction. If impacts are unavoidable they must be mitigated to the full extent practicable and as required by prevailing federal, state, or local laws and ordinances.	The program will aim to avoid impacts, minimize unavoidable impacts, and seek opportunities to mitigate adverse impacts, where feasible, including those impacts to properties outside the DOT right-of-way. The SEIS will include mitigation for adverse impacts, where feasible and in compliance with applicable regulations.
City of Vancouver	30	The Program must identify proposed mitigation for any potential adverse human or natural health impacts.	The program is following the NEPA process and will aim to avoid impacts. The program will aim to minimize unavoidable impacts, and seek opportunities to mitigate adverse impacts, where feasible, including those impacts to human health.

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City of Vancouver	31	The City of Vancouver must be included in any Health Impact Assessment (HIA) work included as part of the Program.	The program is currently planning to complete a Health Impact Assessment in 2023. A technical report in the SDEIS will be analyzing potential impacts to human health in regards to air quality (mobile source air toxins, particulate matter, etc.).
City of Vancouver	32	The Program shall implement a robust workforce training and apprenticeship program that provides opportunities to Vancouver and Clark County residents.	The program is in the process of assessing gaps between the existing workforce and the future workforce needs for successful project delivery. This will inform our workforce development partnerships and strategies we deploy, elements of which are likely to be included in a Community Workforce Agreement (CWA) and/or Community Benefits Agreement (CBA). Specifically, we anticipate including requirements for a training program, as well as hiring local residents and members of equity priority communities. The CBA will also include ambitious targets for contracting with minority- and woman-owned firms. The program will engage with the EAG while developing these agreements, as well as the program partners in development and implementation.
City of Vancouver	33	The Program shall minimize and mitigate disruptions to residents, businesses, roadway users, and the built environment resulting from construction and staging activities, including maintaining multimodal access and circulation.	The program will aim to avoid, minimize unavoidable impacts, and seek opportunities to mitigate adverse impacts where feasible, including those impacts related to construction activities. The SEIS will include mitigation for adverse impacts, where feasible.



## ATTACHMENT B

Agency Name	#	Condition
City of Vancouver	2	In collaboration with Program partners define a GHG reduction goal that is Program-specific and supports state, regional, and local GHG emission reduction goals, including the City’s goal of carbon neutrality by 2040.
City of Vancouver	3	The GHG analysis committed by the IBR Program shall include data related to changes in travel behavior (modal splits and induced demand), modeled vehicle miles traveled at years 2030, 2040, and 2050, and assumptions regarding tolling consistent with Oregon and Washington State Departments of Transportation toll programs.
City of Vancouver	4	Collaborate with Partners to define mitigation strategies for urban heat island effects and air pollutants associated with the infrastructure and vehicular traffic of the Program.
City of Vancouver	5	Prepare and present a plan that shows how Program-related GHG will be monitored and reported during and after construction, and how it will be mitigated plus funding options for mitigations. There shall be regular updates on progress, including annual reporting on the status of the GHG target and mitigation efforts to offset emissions.
City of Vancouver	9	Further analysis is needed to determine design of a bridge that meets the defined Program Purpose and Need.
City of Vancouver	15	Ensure that design of the transit guideway allows for access and use by buses and emergency vehicles in addition to light rail transit.
City of Vancouver	22	Demand management strategies shall be developed with the goals to manage auto demand and congestion during peak traffic periods, support downtown Vancouver's circulation goals, reduce greenhouse gas emissions, and must include the use of variable rate tolling.