PRELIMINARY DRAFT WORKSCOPE

COLUMBIA RIVER CROSSING ACCESSIBILITY STUDY

Prepared October 10, 1988

The outline below describes the proposed study process to be followed in Phase II of the Columbia River Crossing Accessibility Study. The purpose of the Phase II effort is to evaluate the economic, environmental, and engineering feasibility of additional accessibility across the Columbia River between Clark County, Washington, and the Portland metropolitan area in Oregon. The outline is in a sequence designed to first quantify the location and type of future river crossing demand, to then develop corridor alternatives tailored to serve that demand, and finally to evaluate the alternatives to arrive at a recommended plan for maintaining mobility between the greater Vancouver and Portland regions.

I. DATA COLLECTION AND REVIEW

A. Existing and future population and employment data;

B. Adopted land use and transportation plans and programs;

C. Arterial classification maps;

D. Transportation improvement programs (TIP's);

E. Traffic counts for regional freeways and arterials, including bridge volumes;

F. Existing roadway geometrics, number of lanes, etc.;

G. Previous forecasts of cross river travel demand prepared by the Intergovernmental Resource Center (IRC) and the Metropolitan Service District (Metro);

H. EIS documents;

I. Major public and private development plans (e.g., the ports, Portland Development Commission, etc.);

J. Recent aerial photography and mapping of prospective corridors;

K. Maps indicating environmentally sensitive areas;

L. Major utility corridors;

M. Drainage plans;

N. Existing geotechnical data;

O. Existing right-of-way data in major corridors;

P. Cost data from recent roadway and bridge construction projects in the region;

Explanation:

The purpose of this task is to collect available relevant data for the Columbia River Crossing Study Area from local jurisdictions and agencies as well as to begin the necessary field work. This task will supplement data collected and documented as part of the Phase I effort already completed.

This task will include an initial identification of environmental issues and concerns in the study area. This will help to provide adequate environmental review during the development and evaluation of river crossing alternatives.

While preparation of a draft environmental impact statement is not part of this workscope, environmental review and documentation will be accomplished throughout the process to support future environmental analyses. As part of this initial task, a background report establishing baseline data on existing conditions will be prepared. An adequate public involvement process throughout the study is critical in order to identify and discuss environmental concerns of the public.

Products:

The results of the review of existing data will be technical memoranda with appropriate maps and graphics, documenting existing conditions, including travel patterns, deficiencies in capacity, and environmental issues and concerns.

II. DEFINITION AND INITIATION OF COMMUNITY INVOLVEMENT EFFORT

A. Ad hoc Technical Advisory Committee (TAC), including but not limited to staff representatives of the following agencies:

1. Intergovernmental Resource Center of Clark County (IRC).
2. Metropolitan Service District (Metro).
3. Washington State Department of Transportation (WSDOT).
4. Oregon Department of Transportation (ODOT).
5. Staff representatives from the Legislative Transportation Committees of the Washington and Oregon State Legislatures.
6. Cities of Vancouver, Portland, Camas, Washougal, and other cities in Washington and Multnomah Counties.
7. Counties of Clark, Multnomah, Washington, and Clackamas.
8. C-TRAN and Tri-Met.
9. Ports of Vancouver, Portland, Camas/Washougal.

B. A new steering policy committee with a balance of policy officials from affected jurisdictions and agencies.

1. Periodic briefings to Washington policy committee.
2. Periodic briefings to Oregon policy committee.

C. Open houses for the public held at key points in the study.

D. A newsletter providing study updates to a list of interested citizens and agencies.

E. Press releases prepared at key steps in the analysis announcing open houses and presenting study results.

F. Special presentations to policymaking bodies.

Explanation:

A community involvement program will be designed at the outset of the study to keep agencies, businesses, the development community, and the public-at-large informed. This study affects a large number of jurisdictions and agencies; community involvement in the study from the beginning is critical, ensuring that the recommendations that come out of the study meet the public needs and priorities and that there will be public support for adoption and implementation of the recommendations.

Products:

A community involvement program that solicits technical, policy and community input throughout the study, through the use of technical and policy advisory committees, newspaper articles, newsletters and public meetings.

III. DEVELOPMENT OF A CONSOLIDATED REGIONAL TRAVEL FORECASTING MODEL

A. Review structure of IRC and Metro travel forecasting models (both using EMME\2 software).

B. Restructure zonal system and networks to analyze cross-river travel issues.

C. Incorporate mode choice analysis (to address cross-river and Washington side as well as Oregon side).

D. Calibrate to existing conditions.

E. Apply model in order to quantify future cross-river travel demand and to evaluate alternative transportation solutions.

F. Develop a methodology for estimating truck traffic unaccounted for in the model.

Explanation:

This task is placed early in the study process because it is a technical effort that needs advance planning. The purpose of this task is to develop a consolidated regional travel forecasting model that will address both highway and transit modes, including light rail transit, and allow analysis of arterial street networks and transit corridors needed to support cross-river travel demand between Washington and Oregon.

A methodology for estimating future truck traffic across the river will also be developed under this task, in particular, one which addresses heavy truck traffic using the interstate system. This methodology will take into account historical trends, the type of economic development taking place in the region, and how this development relates to other parts of Oregon and Washington.

Products:

A calibrated and validated travel forecasting model using EMME/2 software with a detailed zonal system and network capable of forecasting auto and transit trips across the river as well as on the supporting street and transit networks. A methodology for estimating future truck traffic would also be a product of this task.

IV. BASELINE 2010 AND LONG-RANGE POPULATION AND EMPLOYMENT GROWTH TRENDS

A. Year 2010 forecasts of population and employment forecasts based on adopted land use plans.

B. Longer range "visionary" land use forecast.

C. Allocate forecasts to microzones for transportation model.

D. Assess land use/development impacts of congestion (e.g., of major limitations of cross-river travel capacity).

Explanation:

Year 2010 forecasts of population and employment by small area or microzone will be needed in order to estimate future travel in the region, including river crossings. Future baseline land use forecasts will also be used for the purpose of comparison in assessing how an additional river crossing might impact the future development (including type, location, and density of land use) of the region. How major limitations on cross-river capacity might affect future land use patterns will also be evaluated.

Metro currently coordinates a four-county population and employment forecasting process. The 2010 forecasts are reviewed by all of the local jurisdictions and consensus is reached. As part of this study, it is recommended that study participants develop a longer range forecast (e.g., 30-40 years) that addresses long-range land use policies (i.e., when and where the Urban Growth Boundary might be expanded over the long term).

Products:

2010 and long range land use forecasts by microzones and implications of long-range land use policies.

V. DEVELOPMENT AND ANALYSIS OF CROSS RIVER TRAVEL DEMAND

A. Major origins and destinations of future interstate travel relative to today; identify intraregional versus through or "true" interstate trips.

B. Future daily vehicular demand relative to daily capacity on I-5 and I-205.

C. Future peak hour demand relative to peak hour capacity on I-5 and I-205.

D. Expected duration of peak periods.

E. Levels of service at critical interchanges and intersections on the supporting arterial network.

F. Daily and peak hour transit volumes in major cross river corridors.

Explanation:

Using the regional travel forecasting model developed in Task III above, future baseline forecasts will be developed for 2010 for auto and transit modes. The baseline forecast will be based on a transportation system that includes only those improvements that are now committed. Forecasts of truck volumes on the interstate facilities will be developed outside the modeling process as described above.

This analysis will further clarify the need for and timing of additional capacity across the Columbia, including the type (origin and destination, trip purpose, time of day, etc.) of travel to be served. It will better define the transportation corridors identified in the Phase I effort.

Products:

Analysis of future baseline travel demand for 2010 with respect to its composition and impact on existing river crossings and supporting network.

VI. DEVELOPMENT/EVALUATION OF TRANSPORTATION SYSTEMS MANAGEMENT (TSM) ALTERNATIVE

A. Develop TSM alternative:

1. Additional ramp metering
2. Queue bypass lanes for high-occupancy vehicles (HOV's) at major points of congestion.
3. Additional transit service and park-and-ride lots.
4. Employer-based incentive programs to promote HOV useage, including flexible working hours, bus pass subsidies, priority parking for HOV's, etc.

5. Variable message signs to direct traffic to alternative routes to avoid congestion or incidents.

Explanation:

A TSM alternative will be developed and evaluated to assess its ability to reduce vehicular demand and possibly postpone at least for a few years the need for additional physical capacity across the Columbia. The components of the TSM alternative will consist of those relatively low-cost improvements that make the most out of the existing bridges and feeder network.

The impact of many TSM measures are difficult to quantify even through the use of the travel forecasting model. However, additional transit service, priority treatments for HOV's that reduce travel time, and park-and-ride lots can be assessed using the model.

Products:

Development and evaluation of a TSM alternative that can be compared to more costly "build" alternatives.

VII. DEVELOPMENT OF CONCEPTS FOR AN ADDITIONAL RIVER CROSSING

A. A new bridge crossing west of I-5 with both general purpose and high-occupancy vehicle lanes;

B. A new bridge crossing west of I-5 with both general purpose and HOV lanes that provides for conversion of the HOV lanes to light rail transit in the future.

C. A light rail transit bridge parallel to the existing I-5 bridge.

D. A light rail transit and high-occupancy vehicle (buses and carpools) bridge parallel to the existing I-5 bridge.

E. Converting lanes on either I-5 or I-205 to light rail transit lanes (may not be structurally possible on I-5).

F. A new bridge crossing east of I-205 with both general purpose and/or HOV lanes.

G. Combination of above alternatives.

Explanation:

For each of the major transportation corridors identified in Task V, appropriate river crossing concepts will be developed based on the nature of the travel in the corridor, e.g., the mix of auto versus transit/high occupancy vehicle trips, predominance of particular trip purposes (commuter versus off-peak purposes), share of intraregional versus interstate travel, and percent of trucks.

Products:

A set of alternative concepts within the high demand transportation corridors to be evaluated.

VIII. EVALUATION CRITERIA

A. Ability to serve future travel demand.

B. Facilitates intraregional circulation.

C. Facilitates interstate through traffic.

D. Promotion of transit/HOV use.

E. Safety (traffic operations, conflicting movements weaving).

F. Compatibility with adopted land use plans and some vision of future land policies/plans.

G. Land use impacts (ROW requirements, relocations, displacements, access).

H. Environmental quality.

I. Economic development impacts.

J. Engineering feasibility.

K. Costs.

L. Funding availability.

Explanation:

With input from the technical and policy advisory committees, evaluation criteria will be developed. These criteria will be used to initially screen a range of alternatives to reduce them to a smaller number for more detailed evaluation.

Products:

An agreed upon set of evaluation criteria and associated quantitative and qualitative measures.

IX. INITIAL SCREENING OF ALTERNATIVES

A. Sketch plan level modeling of alternatives.

B. Preliminary assessment of impacts.

C. Evaluation summary of quantitative and qualitative measures.

Explanation:

Based on a sketch planning level evaluation using the criteria developed in Task 8, the Technical Advisory Committee will be asked to reduced the number of

alternatives to a manageable number that can be studied in greater detail (depends upon the time and resources available). This evaluation should include at a minimum sketch plan level modeling to assess likely river crossings for each alternative.

Two of the alternatives to be retained will be the Committed Network and the TSM alternatives.

X. REFINEMENT OF ALTERNATIVE DEFINITION

A. Refine alignments within corridors based on:

1. Aerial photographs and/or topographic maps.
2. Soils/geotechnical information (literature search/ reconnaissance level information).
3. Channel profiles estimated from available mapping.
4. Bottom sediment and bridge foundation conditions approximated from available data.
5. Maps showing existing land use, environmentally sensitive areas, and hydrologic data.

B. Conceptual bridge types based on:

1. Future travel demand in corridor;
2. Transit versus highway modes;
3. Constraints on approach lane location and sizing;
4. Available horizontal and vertical alignment data;
5. Geotechnical data;
6. Span length capabilities of appropriate bridge types;
7. Channel clearance requirements.

C. Supporting networks

1. Identify likely interchange/intersection requirements.
2. Feeder transit service, major transfer locations, park-and-ride lots.

Explanation:

The alternatives selected for detailed evaluation will be further refined with respect to alignment within a corridor, conceptual bridge type and size, and supporting feeder street and transit networks. Note that while the alternatives will still be considered conceptual, they will be detailed enough to code into the microzone-based travel forecasting model, to evaluated approximate right-of-way requirements and displacements and to cost out for an order of magnitude comparison among alternatives.

Products:

Refined definition of each of the build alternatives to include a conceptual alignment, bridge type, and supporting approaches and network. These will be represented on 1"=100' scale drawings or on available aerial photographs.

XI. DETAILED EVALUATION OF ALTERNATIVES

A. Review requirements of different funding sources:

1. Federal Highway Administration (FHWA)
2. Urban Mass Transportation Administration (UMTA)
3. Other state and local requirements

B. Use the Technical Advisory Committee to provide guidance and review.

C. Detailed analysis to include:

1. Modeling of each alternative to produce highway and transit assignments.
2. Detailed traffic impact analysis (demand versus capacity).
3. Impacts on intraregional versus through trips.
4. Refined order-of-magnitude capital costs, including preliminary engineering, design, right-of-way acquisition and construction costs.
5. Operating and maintenance costs.

6. Constructibility and maintenance of traffic during construction issues.
7. Land use and economic development impacts.
8. Environmental impacts (air, water, wetlands, wildlife, vegetation, noise, visual quality/aesthetics, energy, etc.)

Explanation:

The form of the detailed evaluation of the alternatives will depend in part on the likely funding or mix of funding for implementation. For example, UMTA and FHWA have specific requirements for the evaluation of alternatives. The items listed above would fit into either of their overall frameworks. The Technical Advisory Committee, in particular, ODOT and WSDOT, Tri-Met, and C-TRAN can help provide guidance on how the alternatives analysis should be packaged. (Note that this draft outline will also be revised based on review comments from these various agencies.)

Products:

A detailed evaluation of alternatives from which a preferred alternative or course of action can be selected.

XII. RECOMMENDATIONS

A. Selection of a Preferred Alternative or Course of Action.

B. Policy Recommendations Related to:

1. TSM Actions
2. Land Use Policy
3. Future Corridor Preservation

C. Definition of Future Work Program.

Explanation:

The results of the detailed evaluation will be used to select a preferred alternative, to develop policy recommendations, and to identify a future work program, as appropriate. If a future build alternative is the preferred alternative, a work program to complete the environmental analysis and prepare a design report might be developed.

If the TSM alternative is the preferred alternative, policy recommendations would still be needed to reduce travel demand to manageable levels through growth management, strong incentives to increase vehicle occupancies and/or a further extension of peak periods.

Products:

A recommended action plan endorsed by the policy advisory committee.

XIII. FUNDING ANALYSIS

A. Identify possible sources of funding:

1. Federal (FHWA, UMTA)
2. State (Transportation Improvement Board, Rail Development Account, other)
3. Regional/local options (including Transportation Benefit Districts)

B. Toll road and other "innovative" approaches.

C. Assessment of amount and timing of funds from various sources.

Explanation:

A preliminary assessment of funding options will be completed as part of the alternatives analysis. This analysis will be further refined following the selection of a preferred alternative.

Products:

An assessment of funding options, including federal, state, and local options as well as the evaluation of more innovative approaches such as toll roads.

METRO

2000 S.W. First Avenue
Portland, OR 97201-5398
503/221-1646

Memorandum

Date: October 5, 1988

To: JPACT

From: Andrew C. Cotugno, Transportation Director

Regarding: Status Report and Proposed Adoption Schedule for Regional Transportation Plan (RTP) Update

As you are aware, the RTP is in the process of being updated to reflect the significant decisions that have occurred since it was last amended in 1983. Among those decisions to be included in the RTP Update are:

1. Transportation system improvements recommended by the conclusions of major planning studies (Western Bypass; Sunrise Corridor improvements; Mt. Hood Parkway; LRT in the Milwaukie and I-205 corridors); and

2. The establishment of a JPACT-adopted package of 10-year highway and transit priority improvements and the evaluation of costs/revenues associated with those priorities.

Jurisdictional staff are currently reviewing final draft chapters of the document and remaining issues are being discussed at TPAC. According to the proposed adoption schedule (attached), TPAC is expected to forward the draft document to JPACT for release for public review and comment at the November 10, 1988 JPACT meeting. The public review period will last approximately one month (November 11 - December 15) and the results of the public review process will be incorporated in the final document presented for JPACT adoption in January 1989.

ACC:JAG:lmk

Attachment

METRO

2000 S.W. First Avenue
Portland, OR 97201-5398
503/221-1646

Memorandum

Date: September 29, 1988

To: TPAC

From: James A. Gieseking, Jr., RTP Project Manager

Regarding: Proposed RTP Update Adoption Schedule

September 30 TPAC Meeting:	Review and Comment on Chapters 1, 2, 4, 5 and 8
October 21 TPAC Mailing:	Chapters 3, 6 and 7; Introduction; Draft Public Involvement Process
October 28 TPAC Meeting:	Review and Comment on mailed materials; Forward document to JPACT for public release
November 10 JPACT Meeting:	Release of document for public comment
November 11 thru December 15:	Public review period
November 16 TPAC Mailing:	RTP Summary
November 23 TPAC Meeting:	Review and Comment on Summary
December 8 JPACT Meeting:	RTP Summary
December 23 TPAC Mailing:	Summary of public involvement, ordinance, supportive materials
December 30 TPAC Meeting:	Review of public testimony, ordinance, etc.; forward to JPACT for adoption
January 12 JPACT Meeting:	Review of public testimony, ordinance, etc.; adoption and recommendation to Metro Council to adopt
January 26 Metro Council	1st Reading, Public Hearing
February 9 Metro Council	2nd Reading, Adoption

JAG:lmk

NEIL GOLDSCHMIDT
GOVERNOR

Department of Environmental Quality

811 SW SIXTH AVENUE, PORTLAND, OREGON 97204-1390 PHONE (503) 229-5696

STATE OF OREGON

DEPARTMENT OF ENVIRONMENTAL QUALITY INTEROFFICE MEMORANDUM

TO: JPACT DATE: October 13, 1988

FROM: Fred Hansen

SUBJECT: Portland-Vancouver Air Quality Status

Background

The 1977 Amendments to the Clean Air Act required all air quality problem areas in the country to develop and submit pollutant control plans to EPA for approval that would ensure federal ambient air quality standards are met by December 31, 1987. Under this guideline, EPA approved many plans which projected attainment right at the deadline or only slightly before. Oregon submitted control plans for the Portland metro area for both ozone and carbon monoxide (CO) in July 1982. Those plans were approved by EPA in October 1982. The CO plan projected attainment by December 31, 1985. The ozone plan projected attainment during calendar year 1987.

Prior to 1987, Vancouver had not been identified as having a CO problem. To date, Vancouver's ozone monitor has not recorded exceedances of the standard although a borderline value was recorded during this past summer. Vancouver is considered, by EPA, to be an upwind emitter of ozone precursors and, therefore, was required to develop and submit an ozone pollutant control plan. That plan was submitted and approved during 1982.

Carbon Monoxide Status

The DEQ carbon monoxide monitors in Portland have been in compliance with the 8-hour standard since 1984. Late last year we moved a monitor in the downtown to a suspected high exposure location on SW 3rd between Washington and Alder. We recorded one exceedance level at that site in December 1987, but no other exceedances have been measured since that occurrence. One exceedance does not constitute a violation of the standard. Two exceedances in a single calendar year at any one site are considered to be a violation. We still have a downward trend in the emissions of carbon monoxide, so we are confident about achieving compliance with the existing control plan.

Vancouver experienced a violation of the CO standard during 1987. As a result, EPA is now requesting an emissions inventory for the entire consolidated metropolitan statistical area (CMSA) which includes Yamhill county in Oregon. ODEQ is currently negotiating this issue with EPA Region X.

Ozone Status

EPA amended the ozone standard in 1979, changing it from 0.08 parts per million (one hour average) to 0.12 parts per million (one hour average, statistically based, three year period). The new statistical basis of the standard helps to filter out unusual meteorological events. Thus, the data from an unusually hot summer, or conversely, an unusually cold summer would be balanced by data from other years, which would have a normalizing effect.

Contrary to the intent of a statistically based standard, EPA has recently decided to judge ozone compliance by looking at air quality data solely from 1985, 1986 and 1987. This has had the practical effect of changing the Congressional statutory attainment date (to as early as 1984). A related editorial from The Oregonian (June 18, 1988) is attached.

Attachment 2 is a summary of ozone data from our three Portland sites. Ozone (low atmosphere--not the high atmosphere) is created by precursor emissions of hydrocarbons and nitrogen oxides in the presence of strong solar radiation (high sun angle--late May to late July). Of the three DEQ sites, the Carus site has consistently measured the highest levels of ozone in the Portland airshed. The Milwaukie site recorded only two exceedances of the one hour ozone standard during the period from 1979 to 1985. However, this site recorded three exceedances of the standard in 1986 and one in each of 1987 and 1988. Thus, under EPA's rigid and retrospective interpretation of the data, the Milwaukie site has an average exceedance rate of greater than 1.0 per site per year.

Under EPA's retrospective view of the data, the Governor received a letter from EPA Region X in Seattle notifying us of continuing nonattainment for ozone and calling for a two phase revision of the Portland-Vancouver ozone plan. On the basis of EPA's draft Post-87 Policy, EPA is requiring us to evaluate our stationary source emission Rules and tighten them, if necessary, to conform to their latest guidance. We are also required to perform a new base year (1987) emissions inventory. The Department will need METRO's technical assistance to do the highway portion of the inventory. The first phase of the work is to be completed by the end of 1989.

The second phase would involve the adoption of additional control strategies to reduce ozone precursor emissions. EPA has preliminarily informed us that we will need an additional reduction of 20%.

Besides the additional work, EPA's call for a revised plan creates major difficulties for us to provide emission reductions that could otherwise be used for industrial growth. All nonattainment areas are required to accommodate industrial growth through either emission offsets (a given source has to provide an emissions reduction that is equal to or greater than the increase from the source), or a growth cushion. As time goes on, industry will have an increasingly difficult time finding emission reductions. This is especially so if we are unnecessarily required to mandate those reductions to meet the ozone health standard. If we could provide those offsets free of cost (through replenishment of the growth cushion), such action would result in a real incentive for economic development in the Portland area.

Unfortunately, our efforts to date to convince EPA that we have reached attainment have fallen on deaf ears. Since the Congress has recently been going through the reauthorization process for the Clean Air Act, the Governor's office has contacted the Oregon delegation in the hopes of having clarifying language (refer to Attachment 3) inserted into the Clean Air Act. This language, or some equivalent variation, would eliminate EPA's retrospective approach.

The chances for reauthorization of the Act in this Congress now appear to have died. However, we will continue to push for clarifying language in the next Congress, and the Department would appreciate the support of JPACT in this endeavor. Of the members of the delegation from whom we have received a response, including Senator Hatfield, there is very strong support for this position We are essentially asking the Congress to impose some restraint on how EPA judges the adequacy of control plans. This can be of real benefit to other areas of the country that have implemented control plans and find themselves in a similar situation. Furthermore, the clarifying language that we have proposed would not prevent EPA from moving ahead in the areas of the country that clearly have serious air quality problems.

We are presently on the edge of ozone compliance, as was anticipated back in 1982. As a matter of fairness and consistency with past actions, we firmly believe that EPA should take a wait and see stance for marginal areas, such as ours.

Attachments

The Oregonian

Founded Dec. 4 1850. Established as a daily Feb. 4, 1861. The Sunday Oregonian established Dec. 4, 1881. Published daily and Sunday by the Oregonian Publishing Co., 1320 S.W. Broadway, Portland, Oregon 97201.

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SATURDAY, JUNE 18, 1988

Oregon shortchanged

The federal Environmental Protection Agency has double-crossed Oregon by arbitrarily changing its interpretation of what constitutes a Clean Air Act violation.

As a result, Portland and Medford, both of which had complied with the Dec. 31, 1987, deadline for meeting federal standards for ozone and carbon monoxide, remain on EPA's 1988 non-attainment blacklist.

Oregon's Department of Environmental Quality has opposed the new interpretation, but it could use the help of Gov. Neil Goldschmidt and the Oregon congressional delegation to force the EPA to regulate the provisions of the Clean Air Act even-handedly and in good faith.

First, a little history. When EPA approved Oregon's implementation plan for meeting ozone and carbon monoxide standards in Portland and Medford, it indicated in writing and in all conversations with the state DEQ that compliance meant preventing violations after Dec. 31, 1987, not preventing violations two or three years before that deadline.

Moreover, the EPA-approved Oregon strategy demonstrated clearly that Portland and Medford had attained compliance with the standards for 1988.

Not so, according to the latest rankings by the EPA. Without advance warning, the EPA issued a new policy last November, stating that it would use a 1985-87 three-year average to determine an area's compliance with ozone standards, and a 1986-87 two-year average to judge compliance with carbon monoxide standards.

Using these new criteria, neither Portland nor Medford is in compliance with the clean-air standards.

For ozone requirements, a city is allowed to be above the standard one day a year. Portland was out of compliance with the standards for ozone for 1.8 days based on EPA's new 1985-87 three-year average standard. Missing compliance by 0.8 days is hardly a noticeable infraction compared to Los Angeles, which was in violation of federal ozone standards an average of 143 days a year during the 1985-87 period.

Nevertheless, Portland's alleged failure places a city that has made a serious and effective compliance effort on the same national foul-air list with Los Angeles.

Remaining in a non-attainment status could restrict an area's economic growth prospects. It also means that local resources that could be used to tackle serious environmental problems would be wasted on developing another plan for EPA's arbitrary approval.

EPA should be pressed to reverse this policy, if not to accommodate a sense of fairness, then certainly to restore its own credibility.

Apply two-state muscle

ATTACHMENT 2

PORTLAND OZONE MONITORING SUMMARY

Station	Year	1-hour averages Maximum	(date)	2nd Highest	(date)	# of days >0.12 ppm*
Carus	1978	0.158	(07/25)	0.154	(08/03)	9
(Spangler Rd.,	1979	0.125	(07/17	0.105	(05/14)	1
Canby)	1980	0.105	(07/21)	0.100	(04/27)	0
	1981	0.215	(08/11)	0.145	(08/06)	4
	1982	0.120	(06/10)	0.117	(07/25)	0
	1983	0.106	(05/27)	0.093	(07/30)	0
	1984	0.143	(08/08)	0.130	(07/24)	2
	1985	0.136	(07/19)	0.130	(07/20)	2
	1986	0.138	(06/13)	0.121	(08/26)	1
	1987	0.114	(06/29)	0.105	(08/30)	0
	1988**	0.183	(07/20)	0.127	(07/08)	2
Milwaukie	1978	0.192	(07/25)	0.138	(06/03)	4
High School	1979	0.115	(07/16)	0.102	(05/25)	0
	1980	0.095	(04/27)	0.087	(09/10)	0
	1981	0.108	(08/18)	0.106	(08/12)	0
	1982	0.120	(07/25)	0.115	(06/19)	0
	1983	0.125	(07/30)	0.124	(05/24)	1
	1984	0.097	(08/08)	0.083	(08/15)	0
	1985	0.155	(07/19)	0.118	(07/08)	1
	1986	0.174	(07/13)	0.147	(08/07)	3
	1987	0.145	(06/29)	0.111	(08/31)	1
	1988**	0.216	(07/20)	0.109	(08/28)	1
Sauvie Island	1978	0.129	(06/06)	0.125	(07/22)	2
	1979	0.169	(07/16)	0.096	(07/17)	1
	1980	0.085	(07/21)	0.077	(10/05)	0
	1981	0.115	(08/07)	0.109	(08/08)	0
	1982	0.122	(09/02)	0.120	(06/24)	0
	1983	0.059	(08/06)	0.056	(05/24)	0
	1984	0.103	(07/24)	0.095	(07/23)	0
	1985	0.093	(07/19)	0.092	(08/23)	0
	1986	0.097	(05/30)	0.078	(06/12)	0
	1987	0.145	(05/08)	0.097	(06/25)	1
	1988**	0.088	(05/21)	0.077	(08/23)	0

*ppm = parts per million
**Preliminary Data

:D3748

Proposed Amendment to the Clean Air Act
(Clarification of the December 31, 1987, Attainment Deadline)
"The Innocent until Proven Guilty Amendment"

The following language is proposed to be inserted at an appropriate location, as determined by staff, in the various pending Bills to amend The Clean Air Act:

> Notwithstanding the listing of certain nonattainment areas (pursuant to the Mitchell-Conte amendment enacted by the Congress) and consistent with the December 31, 1987, deadline of the Clean Air Act Amendments of 1977, the Administrator shall consider such areas with approved State Implementation Plans (SIP) to be in attainment for carbon monoxide and ozone and excluded from any and all post-87 SIP requirements, unless more than one carbon monoxide standard exceedance per site per year is recorded in 1988 or subsequent years, or more than three ozone standard exceedances per site are recorded in any 3-year period beginning with 1988.

COMMITTEE MEETING TITLE JPACT

DATE 10-13-88 — 7:30am

NAME	AFFILIATION
George Van Bergen	metro
Bill Stark	Clackamas Cities
Bob Bothman	
Ed Lindquist	Clackamas Co.
Marjorie D. Schmunk	Cities of Mult County
Tom Brian	Cities of Washington Co.
Scott Collier	City of Vancouver
Jim Gardner	Metro
Jim Cowen	Tri/met
NICK NIKKILA	ODEQ
RICHARD WAKER	METRO
Bonnie Hays	Washington County
Mike Ragsdale	METRO
Ted [illegible]	[illegible]
Rick Kuehn	CH2M Hill
Bebe Rucker	Port
GRACE CRUNICAN	Portland
BOB Woodell	Port
Pauline Anderson	Multnomah County
Earl Blumenauer	Portland
Gil Mallery	IRC of Clark Co.
Tom VanderZanden	Clackamas Co.
Bruce Warner	Washington Co.

COMMITTEE MEETING TITLE JPACT

DATE 10/13/88

NAME	AFFILIATION
Steve Dotterrer	City of Portland
Howard Harris	DEQ
Andrew Cotugno	Metro
Richard Bardman	"
James Gieseking, Jr.	"
Karen Thickston	"