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June 30, 2008

VIA E-MAIL to DraftEISfeedback@columbiarivercrossing.org
HAND-DELIVERED

Ms. Heather Gundersen, Environmental Manager
Columbia River Crossing
700 Washington Street, Suite 300
Vancouver, Washington 98660



Subject: City of Vancouver Comments on the Draft EIS for I-5 Columbia River Crossing

Dear Ms. Gundersen:

The City of Vancouver appreciates the hard work that has gone into developing information and analyzing potential impacts of the proposed I-5 Columbia River Crossing (CRC) project to date. We especially appreciate the collaboration with city staff from a variety of departments that has occurred as the Draft Environmental Impact Statement (DEIS) was developed. There are still a number of issues and potential impacts to be resolved, as shown on the attached matrix of comments, and we are committed to continuing to work with the I-5 CRC team to resolve them.

Our major concerns are two:

1. The proposed project must be refined to avoid impacts to Vancouver's downtown and redevelopment efforts, to the Vancouver National Historic Reserve (VNHR) and to the neighborhoods adjacent to the project, and
2. The overall cumulative impact of the proposed project and its components on the historic cultural landscape of Vancouver is not clearly defined in the document and thus, is not adequately mitigated.

The City of Vancouver has been working very hard for over a decade to achieve our goal of a revitalized livable downtown linked to the VNHR and to the Columbia River waterfront. Years of planning, fundraising and construction have gone to protecting our historical legacy and building sensitively for the future, including the methodical connection of these historic resources and landscapes to foster an interpretive experience out of isolated resources and locations. We have accomplished quite a bit – the Land Bridge, the Waterfront Trail, Esther Short Park renovation, the new Conference Center Hotel, mixed-use developments around the Park, the Farmers Market, rehabilitation of the Red Cross Building on the VNHR, improvements to Old Apple Tree Park, the Witness Tree Monument, the Captain George Vancouver Monument and Vancouver Landing are part of the effort to honor the past and establish linkages. We have plans to do more toward our goal – to open access to the Columbia River waterfront under the BNSF railroad berm at Esther and Grant Streets, to partner in the Riverwest mixed-use development, including a new central library, to improve the Discovery Loop trail linking the VNHR to downtown, to rehabilitate and reuse historic West Barracks structures, including the Post Hospital, and to build a pedestrian bridge at Seventh Street to link downtown to the Historic

Reserve. We believe the I-5 CRC project can contribute to achieving the city's goal, but it is not reflected in the DEIS analysis or mitigation.

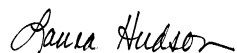
The City of Vancouver has a rich and vibrant history that gives us a unique identity and is one of the keys to our future. Years of City resident, business and stakeholder initiatives have focused on connecting and enhancing the cultural, historic and interpretive landscape of Vancouver, and preserving historical resources and landscape elements. As one of the Northwest's earliest settlements, honoring and preserving our history is a prominent and central purpose that the City has committed to through actions and adopted plans. The improvement of I-5 and implementation of light-rail-transit should promote and enhance this legacy.

Perhaps it is a result of the many components of the project (highway design, bridge design, transit options) and/or of the preparation of the EIS by separate teams focusing on their areas of expertise (economics, air quality, historic resources, etc.), but whatever the reason, the result is a patchwork of analysis that never clearly addresses the big picture. The DEIS does not acknowledge the cultural landscape that the project will cross, treating each area in isolation – the VNHR, downtown, Central Park, the neighborhoods. The DEIS also fails to acknowledge the local effort to maintain and enhance linkages across I-5 and with the past, and the importance of these linkages to the cultural landscape. Mitigation measures are proposed that would adversely affect this landscape and its livability (e.g., 10 to 18 foot sound walls within 10 feet of historic buildings or residences) without analysis or even acknowledging the impacts of these mitigation measures.

Interstate 5 is a major transportation facility that already takes up a lot of land in Vancouver. We have worked to build linkages around it. The CRC project will be larger and more visible, but should avoid taking more land and creating a barrier. We believe that further refinement of the design should work to achieve avoidance of all impacts to properties along the freeway. We believe it is possible to improve safety, reduce congestion and bring light rail to Vancouver without moving the roadway closer to the VNHR and without taking any property from the downtown, from Central Park or from the neighborhoods. We will work with you and the creative team of CRC designers to achieve this.

Again, we appreciate all the work that has gone into the DEIS. We are committed to working with you to complete the environmental analysis and inform the public so that we can make an informed decision.

Sincerely,



Laura Hudson
Community Planning Manager

c: Pat McDonnell	Jan Bader
Thayer Rorabaugh	Brian Carlson
Victor Ehrlich	David Scott
Eric Holmes	Matt Ransom
Phil Wuest	Jeroen Kok

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SUMMARY				
	S-14	Alternative 4	Figure: Supplemental Crossing with BRT	Shows primary bike/ped pathway on only one side. There is a pathway on the other side too and PBAC recommended widening both sides if this option is chosen.
	S-16	Alternative 5	Figure: Supplemental Crossing with LRT	Shows primary bike/ped pathway on only one side. There is a pathway on the other side too and PBAC recommended widening both sides if this option is chosen.
	S-19	Multimodal River Crossing & Highway Improvements	Exhibit 16	Should show bike/ped pathway on Southbound downstream side of bridge not northbound structure.
	S-21	Multimodal River Crossing & Highway Improvements	Exhibit 18	Shows primary bike/ped pathway on only one side. There is a pathway on the other side too and PBAC recommended widening both sides if this option is chosen.
CH 1: PROJECT PURPOSE & NEED				
	1-3	1.3, Purpose & Need	Project Purpose	The fundamental project purpose & need is <i>to improve Interstate 5 corridor mobility by addressing present and future travel demand and mobility needs in the Columbia River Crossing Bridge Influence Area (BIA)</i> . It then goes on to describe specific project objectives all solely in terms of the freeway and river crossing. The purpose and need fails to recognize that this project bisects 5 miles of urban development in Portland and Vancouver. The actual infrastructure of I-5 includes many local roadway over-crossings and under-crossings, pedestrian and bicycle crossings, existing sound walls, and other infrastructure. In short, the freeway is simply one component of a complex overlay of many components of public transportation infrastructure. As a result, the mobility needs and impacts of this project extend beyond the boundaries of the end of a freeway ramp, or the sound wall at the edge of the freeway shoulder. The mobility needs identified in the purpose and need

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				legitimately and necessarily include mobility impairments and impacts caused by the project to travel by all modes for many intra-urban trips that never even enter the freeway. The project objectives fall short in failing to recognize this fundamental and unmistakable characteristic of the freeway—it is a part of the urban fabric. By rending that fabric, the only way to adequately repair the damage is to ensure that each thread of the community is knit back together by the replacement infrastructure. To do otherwise would be to grossly simplify and ignore the true role and impact of the I-5 corridor infrastructure on our community. These aspects of the project are recognized on page 1-7 in the Project Vision and Values. There, community livability, vibrant land use, aesthetic quality, community cohesion, and <i>providing congestion reduction and mobility, reliability, an accessibility for all users and recognizing the requirements for local, intra-corridor travel</i> are of the utmost importance to the project stakeholders. The impacts of the project must really be described in terms not just against the objectives of the freeway project, but in the context of the role of that freeway infrastructure within our community in order to be consistent with and to implement the vision and values of the project as described on pages 1-7 and 1-8 of the DEIS. The alternatives analysis presented in the DEIS falls well short of meeting those goals.
	1-5		Bullet 1	Correct widths of current bike/ped facility. The minimum free and clear space is ~4 feet at bottlenecks. Add air quality, traffic safety (crossing ramps), debris issues (bird and car), user security issues of existing bridge.
CH 2: DESCRIPTION OF ALTERNATIVES				
	2-7 to14	Exh 2.2-5 to Exh 2.2-9		Please include height measurements of different options (or use ghosted out image of old bridge deck) as height of future facilities is important and will affect access to bridge by future bikers and pedestrians due to health issues, vertigo, and length of facility.
	2-9	2.2	Graphics	These graphics (exhibit 2.2-6) illustrate high capacity transit alignments on 6 th Street in lower downtown Vancouver. Converting 6 th Street to a high frequency transit corridor that would take any capacity away from

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				automobile travel is inconsistent with the Vancouver City Center Vision Transportation Plan. 6 th Street is NOT a viable HCT alignment route. The traffic technical report should, if it does not, address the direct impact of taking capacity off 6 th Street on traffic, on land use, and on accessibility. Note: this graphic and problem exists THROUGHOUT the document. I will not comment on each and every one, but the comment here refers to the same error wherever it occurs in the DEIS or technical reports.
	2-11	2.2	Graphics	Example: Same comment as above
	2-13	2.2	Graphics	Example: Same comment as above
	2-15	2.2	Graphics	Example: Same comment as above
	2-19	2.3.1	3d paragraph	Internal inconsistency and failure to identify impacts. Here the text indicates that the Pedestrian and Bike facility may only be 12 feet wide. In other locations in the document the width is described as at least 16'. There is no analysis of the impact—safety, level of service, aesthetic—of building a 12' wide facility. This should be revised, or a comprehensive evaluation of a 12' facility undertaken. There is no information in the DEIS that allows us to evaluate the impact of a minimum 12' facility in place of a minimum 16' facility.
	2-22 to 23	2.3.1	Last line to top of next page	<i>...current designs have the <u>primary</u> pathway west of and adjacent to the high-capacity transit alignment <u>and a secondary pathway on the east side, as recommended by PBAC.</u></i>
	2-23	2.3.1	1 st full paragraph	3 rd line: <i>...both pedestrians and bicyclists in a safe <u>an improved</u> manner.</i>
	2-28	2.3.1	Exh 2.3-8	DEIS failed to disclose known information. Show how proposed traffic routing and ramps from SR500 will facilitate current bike traffic exiting from SR500 onto local street grid and bike lanes (E.39 th St, NE15 th St, and P St.) This is also missing for the SR14 to I-5 NB ramp – as bikes are allowed to exit there to Mill Plain.
	2-29	2.3.1	Exh 2.3-9	DEIS failed to disclose known information. Update transit route number to reflect current services.

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	2-32	2.3.3		DEIS failed to address known conditions. Bike accessway and bike parking facilities at each P+R and at all HCT stations. So far only car parking is addressed.
	2-32	2.3.3	Exh 2.3-14	This table (and in fact the entire document) describes one of the MOS alternatives as the “Clark College” MOS. Whether by design or accident, this is a misleading characterization that leads readers to believe that the station location will actually serve Clark College. In fact, the information disclosed in the document is clear that the station is a park and ride terminus located directly adjacent to Interstate 5 with little, if any, land use benefit or accessibility. The real location of the Park and Ride might better be called the I-5 Park and Ride south of Fourth Plain Boulevard, and right next to the freeway. This is important because the mischaracterization is a serious oversight that leaves readers with the impression that the station will actually serve the college. The possible station locations are, via ADA walking routes, over ½ mile to the main Clark College Buildings, such as the Student Union. Further, there is no information to indicate that there is any ridership generated by the College that would warrant calling the station the Clark College MOS.
	2-35	2.3.3	Downtown Vancouver to Mill Plain District	DEIS failed to suggest reasonable mitigations. Add mention of mitigations where bike and ped facilities are modified. And how these negative impacts could be minimized if on street parking is avoided – such as at station areas.
	2-36	2.3.3	Exh 2.3-18	DEIS failed to disclose known conditions and possible impacts. Additional exhibits for section 2.3.3 should show the street lane layouts in blocks with stations vs. only showing areas without stations.
	2-36	2.3.3	Exh 2.3-19	A design option of showing a bike lane on couplet should be shown vs. on street parking per CoV Comprehensive plan goals and CoV TSP Bike Framework Plan. http://www.cityofvancouver.us/upload/contents/500/bicyclemap.pdf
	2-37	2.3.3	Exh 2.3-20	A design option of showing a bike lane on couplet should be shown vs. on street parking per CoV Comprehensive plan goals and CoV TSP Bike

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				<p>Framework Plan.</p> <p>http://www.cityofvancouver.us/upload/contents/500/bicyclemap.pdf</p> <p>This facility currently has bike lanes and is an important east-west link to the college and high school and neighborhoods with a very high percentage of non-car-owning households.</p>
	2-38	2.3.3	Exh 2.3-21	DEIS failed to disclose known conditions and possible impacts. Additional exhibits for Section 2.3.3 should show the street lane layouts in blocks with stations vs. only showing areas without stations.
	2-38	2.3.3	Exh 2.3-21	<p>A design option of showing a bike lane on couplet should be shown vs. on street parking per CoV Comprehensive plan goals and CoV TSP Bike Framework Plan.</p> <p>http://www.cityofvancouver.us/upload/contents/500/bicyclemap.pdf</p> <p>This facility has planned bike lanes and provides access to the VSAA high school and neighborhoods with a very high percentage of non-car-owning households.</p>
	2-41	2.3.6	Transportation System & Demand Management Measures	There should be mention of the success of the TDM measures used during the September 1997 I-5 trunion repair project.
CH 3: EXISTING CONDITIONS & ENVIRONMENTAL CONSEQUENCES				
3.1: Transportation				
	3-13	3.1.2	1 st paragraph	Add discussion about the proposed extension of the Waterfront trail to the west. Two paragraphs prior to this one discuss major trail improvements on the Portland side. The waterfront trail needs to be mentioned in this paragraph as an important project that will be extended with the Boise Cascade site waterfront project.
				The DEIS fails to indicate the number of trail users using waterfront trail facility on north bank of Columbia, and the need for access to the Old Apple Tree or Waterfront Parks from those users and the impacts of not providing

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				access or alterations of access on that user group.
	3-23		No-Build: Local Street Performance	Add bullet: <i>Increased traffic congestion and lane reconfigurations would degrade overall bike safety and access to the I-5 bridge, bike parking and overall street network.</i>
	3-30	3.1.3	Alt. 2, Ped and Bike	The DEIS failed to analyze the impact of removing direct pedestrian and bicycle access to Columbia Way adjacent to the waterfront trail and 4(f) resources that are along this pathway. In the first paragraph it states that this alternative <i>would substantially improve bicycle and pedestrian connectivity</i> which has not been studied and cannot be supported. The existing bridges currently provide bicycle and pedestrian facilities on both sides of the crossing, with direct access to the Vancouver waterfront for both directions. This alternative only provides a pathway on one side of the bridge crossing, with indirect access to the Vancouver waterfront. This is a direct impact that has not been studied, with no proposed mitigations. The current access points to the bridge provide a direct access to the Waterfront Trail, the Old Apple Tree Park, the Confluence Land Bridge, and the Historic Reserve, all of which are Vancouver 4(f) resources.
	3-30 & 3-31	3.1.3		<p>The DEIS failed to analyze the impacts of the project actions on pedestrian and bicycle access and safety within the BIA. Where it exists, the analysis included in the DEIS is superficial, anecdotal and inconclusive.</p> <p>Neither the Alternative 2: Peds & Bikes section on p 3-30 nor the Transit Safety & Security section on p. 3-13 addresses the impacts to pedestrians and bicyclists off the freeway facility. The discussion of addition of facilities on the river crossing itself is wholly inadequate to determine what the true long-term impacts will be for pedestrian and bikes throughout the project influence area—including the ramp terminals and interchange areas, as well as the highway over-crossings, and in and around transit facilities along the entire project alignment.</p>
	3-30 & 3-31	3.1.3		The DEIS failed to analyze the impacts of the project actions on pedestrian and bicycle access and safety within the BIA. Where it exists, the analysis

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				<p>included in the DEIS is superficial, anecdotal and inconclusive.</p> <p>Further, on p. 3-31 the Transit Safety and Security section simply provides a conceptual overview of what safety and security issues may exist. There is no analysis, beyond the bare speculation presented, of the real transit project impacts. There has been no detailed evaluation of implementation of the proposed park and ride location traffic impacts, nor of the impacts of the bus system around those stations on the traffic, air quality, pedestrians, bikes, businesses, residents, crime, or any other impact. Speculation that the alternative would <i>potentially increas[e] the risk of collision</i> is wholly insufficient to draw any reasonable conclusion about likely significant impacts. See also p. 3-33 and others. A detailed evaluation of the proposal WITH the park and rides in place, and WITH the bus operations in place will be needed to determine impacts and mitigations.</p>
	3-30 & 3-31	3.1.3		<p>The DEIS fails to sufficiently analyze the safety related conditions for bikes and pedestrians using existing off street paths within BIA. Given the proposed disruptions and detours, and alterations of existing pathways streets, in particular changing the function and character of Columbia to include primary access to/from SR-14, and the northward terminus of the Replacement Bridge option bike/ped facility; there will be adverse impacts to safety and breaks in access that were not sufficiently analyzed and no mitigation measures proposed.</p>
	3-33	3.1.3		<p>This section does not include mention of traffic congestion and travel times associated with Alternative 3 like that presented for Alternative 4. It is difficult to distinguish and compare the impacts between alternatives when different information is presented for each. This section needs to be re-organized so that the alternative impacts can be meaningfully compared. What's more, while potential impacts and mitigations are identified in some locations (but not consistently!), they are not in others. For example, p. 3-37, top of page, 2nd paragraph, includes a discussion of how travel demand at from Marine Drive and Hayden Island wouldn't be able to access the</p>

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				freeway, but fails to detail out the impacts, or to offer observations on potential impacts. This is a problem throughout this section and makes meaningful conclusions regarding the impacts of the alternatives and potential mitigations very difficult to draw.
				The traffic study travel time analysis is insufficient. This travel time analysis should also include estimates of before and after for bike and pedestrian traffic...to include intersection delay entering leaving the BIA due to more traffic, signalization changes, longer bridge lengths, out of direction travel – especially to reach shoreline trails, higher elevation to reach bridge top, etc.
				The DEIS failed to address the travel times through BIA for bicyclists under all scenarios. The length of delay crossing bridges and traveling through intersections to reach new bridge or across park and rides with more traffic should be evaluated. The length of time to across the new higher/ longer bridge and associated intersections with more traffic should not be worse than no-build scenario or replacement scenarios.
	3-38 & 3-39			See p. 3-39 first for a description of the bus transit frequencies, then turn back to p. 3-38 for a discussion of impacts of the alternatives to Vancouver local street performance. P. 3-39 discusses high frequency of service, while p. 3-38 doesn't even mention potential impacts to city streets (traffic, pedestrian, land use, air quality, etc.) from this alternative. Similar problems in other parts of this section (describing each of the 5 alternatives). Failure to disclose and discuss potential impact makes it very difficult to determine just what the real impacts and potential to mitigate are. See p. 3-51 Transit mode local street performance for an example of how the information presented really fails to address these issues in a meaningful way.
	39	3.1.3	Alt. 4, ped and bike	The DEIS failed to analyze the impact of removing direct pedestrian and bicycle access to Columbia Way adjacent to the waterfront trail and 4(f) resources that are along this pathway. In the first paragraph it states that this alternative “would substantially improve bicycle and pedestrian connectivity” which has not been studied and cannot be supported. The existing bridges currently provide bicycle and pedestrian facilities on both

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				sides of the crossing, with direct access to the Vancouver waterfront for both directions. This alternative only provides a pathway on one side of the bridge crossing, with indirect access to the Vancouver waterfront. This is a direct impact that has not been studied, with no proposed mitigations. The current access points to the bridge provide a direct access to the Waterfront Trail, the Old Apple Tree Park, the Confluence Land Bridge, and the Historic Reserve, all of which are Vancouver 4(f) resources.
	3-48 to 3-49	3.10.3	Starting at last paragraph	It states in this paragraph that the replacement bridge option would have the bike and ped path land at approximately 6 th Street. If you measure from the point on the east side of the bridge where a pedestrian comes off at the bridge path at Columbia Way where they can access the trail, they will have to walk over a half of a mile to reach this same point with a bridge path on one side as being proposed. Right now they have to walk about 100 feet to access the Waterfront Trail. By removing this current facility with only one pathway you are eliminating direct access to the Waterfront Trail, the Old Apple Tree Park, the Confluence Land Bridge, and the Historic Reserve, all of which are Vancouver 4(f) resources. This holds true for pedestrians on the west side of the bridge as well. The new proposed pathway will require them to walk the same distance. There is a second “potential” connection mentioned that would be closer to the waterfront. This should not be a consideration, but a required mitigation for the 3000% increase in travel distance.
				The DEIS failed to address the impact of removing bicycle and pedestrian access, and creating longer travel distances with the project action. The replacement bridge option discusses one pathway on the east side that would land around Old Apple Tree Park. This would require pedestrians traveling over 1,000 feet out of direction in order to reach the same point they currently can at Columbia Street. The impact to eliminating access on the west side of the bridge needs to be addressed.
	3-50			Add statement: <u>Interstate bike/ped traffic traveling along I-5 should be given priority at intersections if at grade crossings are allowed – due to the use by</u>

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				<u>vulnerable road users and effort to minimize overall delay so as to meet policy goals of increasing bike/ped traffic as percentage of all trips.</u>
	3-61	3.1.4	Clark College Minimum Operable Segment: Local Street Performance and the following section	While these sections purport to address local street performance of the location of a park and ride facility, there is no information presented upon which reasonable conclusions may be drawn. Beyond a broad regional travel demand model evaluation of the park and ride location effectiveness, there is no information presented regarding the actual traffic impacts to Vancouver's city streets (such as Fourth Plain, Mill Plain, McLoughlin, & others) of placing a large park and ride facility, and providing access to it from local streets. Without an evaluation, no impacts can be identified; without impacts identified, it is impossible to determine what, if anything, could mitigate those impacts. The lack of disclosure and apparent analysis of such a major project component is both alarming and suspicious; and makes it nearly impossible to draw meaningful conclusions (beyond the broad conclusory observations offered) regarding potential project impacts. This same comment holds true for each of the transit terminus options. Failure to adequately evaluate the roadway, neighborhood, safety, economic, and other impacts associated with the location of these park and ride facilities, and the additional auto and bus traffic they will generate is a serious shortcoming that must be remedied to fully disclose all potential project impacts.
	3-67	2-way Washington or Washington/Broadway Couplet	Bottom of the page	Although the text explains the 35% increase in cost to build the couplet, the section is still misleading in terms of the overall cost. It would be better to present either a hard number that can be compared against the total cost of one of the alternatives, or to present the cost in terms of a percentage of the total transit cost for one of the complete alternatives, such as the Clark MOS. Simply presenting it as a 35% cost increase, despite the qualifying text, is misleading.
	3-68			See comment regarding pg 3-61, Section 3.1.4, Clark College Minimum Operable Segment: Local Street Performance and the following section and read the section on two-way Washington or Washington-Broadway transit

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				couplet. If you read it carefully, you'll realize that it really says nothing at all . . .it is just a bunch of words strung together that do little to draw out meaningful conclusions regarding impacts or potential mitigations.
	3-71	Vancouver Local Streets		DEIS failed to account for full impacts and proposed reasonable mitigation measures for local street impacts of the various transit options considered. Analysis is ambiguous and does not lead to conclusive findings as to whether mitigation measures identified in tables 3.1-52 and 3.1-53 can be implemented and whether implementation of any or all of these mitigation measures would resolve and sufficiently mitigate the proposed action or whether implementing any of all of these measures would in net result in additional impacts that would need to be mitigated.
	3-73 to 74	Bridge Toll		This section describes the traffic impacts of the tolling alternatives, but does not present any information on other tolling impacts, as mentioned in the previous comment—the incidence of benefits and burdens of the tolling alternative must be disclosed.
	3-76	Temporary Effects: Regional Traffic	4 th full paragraph	As with other mitigations identified in this document, here there is no discussion of the impacts of the proposed re-routing of traffic to I-205. Who will be impacted? Will there be air quality, noise, or economic impacts? Safety impacts on SR-500, I-205 or SR-14? Additional congestion or delay that will result from the re-routing of traffic? If so, how will those impacts be mitigated?
	3-76			DEIS failed to recommend a reasonable mitigation measure, and the proposed mitigation causes a resulting significant impact that will need to be mitigated. Detour of bike/ped traffic to I-205 during construction closure (PM and weekends) of I-5 is UNACCEPTABLE. Please include mitigations other than rerouting to I-205.
	3-76			DEIS failed to identify sufficient mitigation measures for known impacts. See Temporary Effects: Transit and bike access across the Columbia within the BIA will have to be enhanced greatly (not degraded) if motorists are to successfully change travel modes to avoid some of these construction

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				impacts. (To meet project policy.)
	3-78 & 3-79		SR 14 Interchange	This section discloses that the SR14 / I-5 interchange will be closed to downtown Vancouver for up to 3 years during construction. That alone can hardly be considered disclosure of an impact. The section goes on to discuss where traffic will likely go to re-route, and closes by suggesting that a public information campaign should be enough to mitigate the construction impact. This section is ENTIRELY insufficient to draw any meaningful conclusion of potential impacts and necessary mitigations. This is a major access to two freeways in lower downtown Vancouver. What, specifically will be the traffic impacts from re-routing? Can Mill Plain Boulevard handle the extra traffic? Will there be measurable impacts to homes or business from additional traffic, noise, exhaust? Does closing these access points impact the viability of any existing businesses? If there are impacts, what is appropriate mitigation? Speculation about what people might do once the access is closed and how a public outreach campaign should be enough to mitigate impacts is wholly insufficient. It doesn't even pretend to present conclusion of an evaluation of impacts, let alone potential mitigations, and even potential impacts of the proposed mitigations. There are only two freeway accesses into the core of downtown Vancouver, and this 1.5 page section proposes to close one of them without evaluating the impacts. Please re-evaluate and provide the real impacts and real mitigations necessary as result of this action.
	3-78 & 3-79		SR 14 Interchange	City of Vancouver Comprehensive Plan for downtown growth and traffic circulation rely on access to SR-14 and I-5 in lower downtown. The Plan stipulates clearly the need for this access. Therefore, the City has created a Plan which assumes no net loss of access to downtown from the southern interchanges. Given the prominence of these interchange access points vis-à-vis downtown traffic circulation, any loss of access, even temporary, would significantly and adversely affect downtown access. The DEIS fails to analyze nor recommend appropriate mitigations given the magnitude, duration and thus direct impacts such a closure would have on Vancouver downtown streets.

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	3-78 & 3-79		SR 14 Interchange	The DEIS fails to sufficiently account for the direct impacts to traffic circulation related to the construction disruption and staging plan. In particular, the DEIS fails to address the short term and cumulative impacts of closure of the SR-14 interchange access. The DEIS does mention the that the Mill Plain interchange is operating poorly in the existing and future condition, yet draws no conclusions or reference as to how closure of the SR-14 access will affect this interchange, nor how generally the affected traffic will be re-routed.
	3-79		4 th paragraph	There is one sentence in this paragraph that states <i>Evergreen Boulevard would close for 9 to 12 months while the new crossing is constructed</i> . This is the only sentence that mentions this closure. There is absolutely no discussion about the impact of this closure and the mitigations. This is a critical link from downtown Vancouver to the Historic Reserve, and one of the most popular bicycle routes in Clark County.
	3-79			DEIS failed to identify sufficient mitigation measures during construction. Construction activities on local streets should include separate queuing space/bike lanes for bike traffic and level, non-skid crossings of steel plates and traffic calming within work zones.
	3-79			DEIS failed to identify sufficient mitigation measures during construction. Construction activities on local streets should include separate queuing space/bike lanes for bike traffic and level non-skid crossings of steel plates and traffic calming within work zones.
	3-80	Temporary Effects: Pedestrians & Bicyclists	Next to last paragraph, 3 rd line	DEIS failed to sufficiently address known or expected impacts. This effect will be greater than described as <i>slightly</i> .
	3-80	Temporary Effects: Pedestrians & Bicyclists	1 st paragraph under this heading	DEIS failed to disclose known impacts and identify a sufficient mitigation response. Impact of HCT construction on bike and peds would be very great as intersections are closed for construction or traffic congestion impacts bikeway capacity or pedestrian crossing cycle lengths and safety.
	3-80	Temporary Effects:	Next to last	DEIS failed to suggest reasonable/sufficient mitigation measure to known

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		Pedestrians & Bicyclists	paragraph	impact. The closure of one side of the bridge path during construction is not acceptable during peak periods unless there is more capacity added – the current growth in bridge use will not allow this to be done and successfully meet other project policy goals. The bridge traffic on the path is very much higher than during the last long-term path closure. If unavoidable, discuss mitigations (shuttle bus or ferry, fare-free transport, non-peak hour openings when shuttle or transit is closed).
	3-80 to 3-81		Temporary Effects: Pedestrians & Bicyclists	This section is very confusing, and doesn't really appear to address key issues. Closing bike and pedestrian access off to any area, or requiring any significant detour for any length of time is a very big impact for those that are dependent on those routes for transportation. The brief discussion of the potential to completely close a pedestrian and bicycle access to Hayden Island for 13 months is deficient—it does not address the user groups that would be impacted, how they would be impacted, nor how those impacts would be mitigated. The same may be said for the proposal to use the Confluence Land Bridge as a detour route. The Old Apple Tree Park and Confluence Land Bridge are 4(f) resources, so some additional discussion of the impacts of the discussed detour route must be addressed.
	3-80 to 3-81		Temporary Effects: Pedestrians & Bicyclists	The DEIS failed to propose a sufficient or clear mitigation plan for the expected impacts. There is no analysis of the impacts to bicycle and pedestrians with the closed and under construction roadways such as Evergreen Blvd, Mill Plain interchange 39 th Street, etc. This is not included in the Temporary Effects anywhere. Impacts to bicycle and pedestrians can be a significant safety hazard due to roadway surface disturbances such as holes, gravel, grates or by forcing out-of-way travel on roadways less suitable for bicyclists and pedestrians. Because this project will be built after the adoption of the Public Right of Way Guidelines, ADA law will require that all construction impacting pedestrian routes have an accessible route provided. There is no discussion of this and how this will be addressed.
	3-81	Temporary Effects: Pedestrians &	3 rd paragraph	DEIS failed to suggest reasonable/sufficient mitigation measures to known impacts. Need to mention mitigations for bike and ped access if 29 th , 33 rd

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		Bicyclists		and Evergreen I-5 crossings are closed – especially if the closures are concurrent. These crossings are currently very important for area access across I-5 for vulnerable/novice road users due to their low speed and low volume traffic (low freight traffic too) operations vs. 4 th Plain, Mill Plain, and 39 th St.
	3-81	Temporary Effects: Construction Safety	After 4 th paragraph	Add new paragraph sections to hold <u>Bike/Ped Mitigations</u> and <u>Temporary Effects: Bike and Ped Performance</u> – similar to how transit discussion was treated.
	3-82	Temporary Effects: Construction Safety	2 nd paragraph	Mention should be made that bike access parallel to the work zones should be provided where convenient and effective – if bike lanes cannot be established with in a work zone.
	3-83	Potential Mitigation Measures	Last paragraph	The DEIS failed to proposed a sufficient or clear mitigation plan for the expected impacts. This paragraph discusses a public outreach campaign and the possibility of the project helping a transportation management association. In fact, this description is much too vague to be of any use in determining whether or not the proposed mitigation would come anywhere close to mitigating the impact of a 2-3 year direct construction impact, along with street closures, detours, noise, dust, and other construction-related impacts. These impacts are potentially great on the economic viability of many downtown businesses, yet the section does not really address those impacts at all. Likewise, there is no strategy even mentioned for how to mitigate impact for downtown residents that will live amidst the construction for several years. In short, this section must move beyond broad statement about what the project <i>could</i> do, and detail, specifically, what the impacts of the project <i>will</i> be, and how EACH potential impact can be mitigated with enough specificity that the City can respond intelligently as to the adequacy and the merits of each proposed alternative.
	3-85		Exh 3.1-53	The DEIS failed to proposed a sufficient or clear mitigation plan for the expected impacts. This table presents a laundry list of potential mitigation measures, but provides little concrete direction on how they would be implemented, or if implementing them would have significant

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				environmental consequences. Additionally, some of the proposed mitigation measures are either moot or suggest an outcome contrary to current city policy. More disturbing is that while they purport to be strategies to mitigate potential impacts of the MOS alternatives, there is simply no way to evaluate their potential effectiveness as mitigation measures because detailed implementations of the MOS alternatives with associated park and rides were not evaluated at an appropriate level of detail. We don't know, for example, how the traffic will circulate, how great the congestion, noise, air quality, or land use or economic development impacts would be of locating the MOS park and rides in the contemplated locations. This section needs to be re-written once the appropriate level of analysis has been completed to identify the real potential impacts of the alternatives under consideration, and it must include consideration of the potential environmental consequences of the potential mitigation strategies.
3.2: Aviation & Navigation				
	3-91	Alternative 1: No-Build	1 st paragraph	Pearson Field is not only surrounded by the Vancouver National Historic Reserve, it is a NRHP resource in its own right. This listing affects potential changes at the airport more than surrounding uses.
3.3: Property Acquisitions & Displacements				
	3-100 to 3-101	3.3.2, Long-Term Effects		This section discusses potential property displacements of each alternative. Lacking in this section is an analysis, not of the specific impact to each property, but the cumulative effect, if any, to the subarea in which the properties are located. Will it change the area's character? How? Identification of specific properties is a good start, but the EIS needs to take the next step and actually identify what the long-term neighborhood impacts are from the aggregated impacts of all acquisitions.
	3-118	3.3.5, Potential Mitigation Measures	1 st paragraph	This paragraph should make it clear that avoiding impacts is the first preference.
	3-119	3.3.5, Potential Mitigation Measures		See comment concerning pages 3-100 to 3-101. This is the same issue: There is no discussion of the potential effect on neighborhood character

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				from the cumulative impact of all property acquisitions.
3.4: Land Use & Economic Activity				
	3-124	3.4.1, Adopted Plans	Local - Washington	<ul style="list-style-type: none"> ▪ 5th bullet – The VCCV was adopted in 2007 (delete 2004). ▪ 7th bullet should read: <i>Vancouver-Clark Parks & Recreation Dept., 2004. Paths & Trails Master Plan.</i> ▪ 8th bullet – The Central Park Plan was adopted 2008 (delete 2007)
	3-127 to 131	3.4.2, Long-Term Effects	Discussion, but especially tables 3.4.5, 3.4.6, and 3.4.7	The No-Build alternative is not consistent with the Vancouver Comprehensive Plan or its components, the VCCV, Central Park Plan and Transportation System Plan. All of the build alternatives are consistent. The analysis in the DEIS and/or the Land Use technical support does not document/support a finding that any one alternative is more consistent than the others. The tables should simply read “consistent” or the supporting analysis should be provided.
	3-127	3.4.2	1 st paragraph	<p>The following additional land use and economic effect should be analyzed under the long-term effects of each alternative:</p> <ul style="list-style-type: none"> • <u>Direct Land use and economic effects from the additional physical size/width of the bridge, freeway and freeway intersections</u>
	3-127	3.4.2		<p>There is no discussion of cumulative long-term impacts. This is critical because the adopted comprehensive land use plan for Vancouver has a wide variety of elements (housing, community development, economic development, transportation, schools, parks, etc.) that all tie to a common vision of Vancouver’s future. This project will have impacts ranging from property acquisition, to accessibility, to traffic, to aesthetics, to construction impacts, to shadows from the bridge, to traffic levels, and sound... Together, cumulatively, these impacts may threaten the careful balance of planned community development that is represented in Vancouver’s comprehensive plan. Each sound wall may not individually have much of an effect, but the combined impact off all of them, along with the sheer mass of the river crossing structure, may make it very unlikely that Vancouver ever achieves its integrated plan of community development. The EIS must</p>

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				identify the cumulative impacts of all of the individual potential impacts (along with their individually proposed mitigation measures) and present some credible findings on the real impact to Vancouver, the Columbia River Waterfront, the Vancouver Historic Reserve, Fort Vancouver, and other Vancouver neighborhoods. This EIS fails to tie these impacts together and is therefore deficient on its face.
	3-128	3.4.2	2 nd paragraph	Failed to identify impact: A larger capacity freeway, intersections and bridge will negatively affect the City Center by severely dividing west and east Vancouver. This should be identified as a direct negative impact to be mitigated.
	3-128	3.4.2, Alternative 2	4 th paragraph	Add: <u>A BRT system will impact commercial and high density residential downtown land uses and economic activity negatively compared to LRT. Because of the lower capacity of BRT vehicles vs LRT trains many buses will be needed to carry the same capacity as only one LRT train. These buses will stack from block to block and create an undesirable congested environment for priority users of the downtown (shoppers, business and commerce and urban residents living downtown).</u>
	3-129	3.4.2, Alternative 3	Top paragraph	LRT alternative would create less congestion with only one train every so often vs. many buses that tend to stack up during peak hours (even with staggered schedules).
	3-129	3.4.2, Alternative 4		Add: <u>A BRT system will impact commercial and high density residential downtown land uses and economic activity negatively compared to LRT. Because of the lower capacity of BRT vehicles vs LRT trains many buses will be needed to carry the same capacity as only one LRT train. These buses will stack from block to block and create an undesirable congested environment for priority users of the downtown (shoppers, business and commerce and urban residents living downtown).</u>
	3-130	3.4.2, Alternative 5	1 st paragraph	LRT alternative would create less congestion with only one train every so often vs. many buses that tend to stack up during peak hours (even with staggered schedules).

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	3-130	3.4.3	1 st paragraph	<p>Failure to identify impacts of the freeway design, particularly the size/width and increased size of intersections. The proposed freeway size will have significant impacts on the land use and economic activities of the City of Vancouver. Include within this section a discussion on the impacts of freeway width and increased lanes at intersections.</p> <p><u>ADD: The increased width and capacity of the proposed freeway will negatively impact the success of the land uses and economic activity in downtown Vancouver on the Westside of I-5 and Vancouver's significant urban civic resources of Central Park, especially the Historic Reserve, on the eastside of I-5. The success of the Downtown land uses and economic activities and the Historic Reserve land uses and economic activities are inextricably tied to one another and to the quality and quantity of multimodal connections, and especially pedestrian connections with a walkable quality ambiance, cohesive connectivity and thriving intimate urban spaces.</u></p>
	3-134	3.4.3	1 st line	<p>The EIS here states that <i>Overall, the CRC project would comply with the direction of the Vancouver Comprehensive Plan...</i> However, to the extent that the project in any way makes it significantly more difficult to achieve adopted plans, the impact would be inconsistent with the adopted comprehensive plan. For example, the 7th Street Heritage pedestrian crossing connecting downtown Vancouver with the Historic Reserve is included in the City's plan. If the CRC project is constructed as planned and does not include that connection at the time of construction, it will be virtually impossible to build in the future because of the increased freeway width, and the need to design around structural elements to support the Heritage Bridge structure. To the extent the project precludes such connections (and this is just one example) it would be INCONSISTENT with Vancouver's adopted Comprehensive Land Use Plan.</p>
	3-134	3.4.3	4 th paragraph (discussing	<p>This discussion is inadequate. 6th Street is a planned freeway access point; is one of only two uninterrupted east-west roadways in south downtown</p>

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			the closure of 6 th Street)	Vancouver; is the sole entrance to an 800+ space city-owned parking facility under Vancouver Center; and is the roadway fronting on the downtown Hilton Hotel and Conference Center and Esther Short Park. The document says closing 6 th ... <i>could negatively affect the economic vitality of several businesses...</i> As described above, the real potential impacts from this closure are not disclosed here.
	3-134	3.4.3	4 th paragraph (discussing the closure of 6 th Street)	DEIS failed to evaluate and recommend sufficient mitigation to known impact. Closure of 6 th Street and Washington would negatively affect bike and ped access to area businesses and to street network leading to bridge.
	3-134	3.4.3	5 th paragraph	DEIS failed to address known impact of project action. The raised bridge height and length would negatively affect access by bikes and peds requiring greater energy to expend and potentially longer out-of-direction travel to reach local destinations along shorelines.
	3-134	3.4.3	Under <i>Induced Growth</i>	Note that urban infrastructure in the heart of an urban area may not only induce growth on the urban periphery (depending on the regulatory framework), but may also foster significant densification of the urban core.
	3-138	3.4.3	Plan Consistency, 3 rd paragraph	The VCCV does not specify LRT as the preferred mode of HCT. It should not be listed in this sentence, but in the paragraph above with the Vancouver Comprehensive Plan.
	3-138	3.4.3	<i>Induced Growth - effects of transit</i>	The discussion here does not address impacts to non-station area blocks, or impacts to individual business owners in the vicinity of station blocks and non-station blocks.
	3-139	3.4.3	Top paragraph	Add: <u>A BRT system will impact the commercial and high density residential downtown land uses and economic activity negatively. Because of the lower capacity of BRT vehicles vs LRT trains many buses will be needed to carry the same capacity as only one LRT train. These buses will stack from block to block and create an undesirable congested environment for priority users of the downtown (shoppers, business and commerce and urban residents</u>

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				<u>living downtown).</u>
	3-143	3.4.3	Exh 3.4-19	Please include similar analysis of bike catchment areas and effects in reaching future LRT stations (to help provide ridership in order to avoid slower bus transfer trips).
	3-144	3.4.3	Exh 3.4-20	Please include similar analysis of bike catchment areas and effects in reaching future LRT stations (to help provide ridership in order to avoid slower bus transfer trips).
	3-145	3.4.3	2 nd paragraph	This section suggests that the project may replace on-street parking spaces for various alignment alternatives; and this same strategy is mentioned in several other locations within the document. Instead, there should be no net loss of parking in any part of Vancouver as a result of this project. Parking capacity in Vancouver is a resource here to serve today's resident's and businesses, and to provide to growth in the future. The project cannot take these resources without replacing them without impacting Vancouver's ability to achieve it's growth plans as adopted in the Comprehensive Plan and the Vancouver City Center Vision Plan.
	3-145	3.4.3	3rd paragraph	Challenge statement: There should be greater opportunity for redevelopment and enhancements while keeping same on-street parking supply if couplet on Main and Broadway were used.
	3-146	3.4.4, Temporary Effects		This section addresses potential temporary effects of construction, yet fails to mention noise, traffic, dust, pavement degradation, dampening of economic activity, dampening of economic development, and other impacts.
	3-147	3.4.5, Potential Mitigation Measures		This section fails to assess the long-term cumulative impacts of all of the business displacements or disruptions that may be caused by any phase of the project.
	3-147	3.4.5, Potential Mitigation Measures		The DEIS fails to sufficiently account for the direct impacts to traffic circulation related to the construction disruption and staging plan. The DEIS fails on all accounts to sufficiently analyze the direct or cumulative impacts that such a long duration closure would have on the business environment. Omission of such analysis constitutes failure and the proposed mitigations

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				are insufficient to address the expected impacts associated.
	3-147	3.4.5	Potential Mitigation Measures	<ul style="list-style-type: none"> ▪ 2nd paragraph – There are no alternative ways to connect downtown with the waterfront. This is an unmitigatable impact and the DEIS should so state. ▪ 2nd paragraph – the railroad line is BNSF not UP ▪ 6th paragraph – the mitigation for removing on-street spaces is to provide them off-street. The existing public off-street garage was sized to accommodate proposed redevelopment, not to mitigate for removal of on-street spaces. All of the existing garage capacity is committed. There is no excess to mitigate for the impacts of lost on-street parking from transit.
	3-147	3.4.5	Potential Mitigation Measures	<p><u>Add: Potential Mitigation for the increased freeway width</u></p> <ul style="list-style-type: none"> ▪ An enlarged lid at Evergreen Blvd that includes park/open space. Street trees on Evergreen Blvd with a large wide canopy and 12’ or wider sidewalks. ▪ The 7th Street pedestrian crossing as listed in the Vancouver City Center Vision Subarea Plan ▪ An undercrossing of 5th Street – at least as a pedestrian connection – designed and landscaped as a safe, aesthetic and welcoming pedestrian connection. ▪ The extension of Main Street to Columbia Way and the waterfront. ▪ Finished grades within the new lands created under the new replacement bridge shall be such that a clear vista from west to east is created and accentuated and the grades shall facilitate comfortable pedestrian travel creating an obvious connection from west to east and to the waterfront. ▪ Gateways –Mill Plain, McLoughlin and Fourth Plain intersections and underpasses along the I-5 alignment should include special plantings of small groves of tall-growing conifers, identified street trees and other plants with seasonal color in a distinctive gateway landscape; include wide 12’ or greater sidewalks with 8’ planting strips separating

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				sidewalk from curb; and include bicycle lanes. <ul style="list-style-type: none"> ▪ Plant native tall-growing conifers along the eastside of the freeway alignment in the Central Park planning area ▪ Sound walls
3.5: Neighborhoods & Environmental Justice				
	3-151	3.5.1, Neighborhood Plans	5 th Bullet	Add bike parking to parking notation.
	3-154	3.5.1	Exh 3.5-4, pg 1 of 2	The VA Medical Center is not identified on the map.
	3-155	3.5.1	Exh 3.5-4, pg 2 of 2	#35 is identified as the VA Medical Center in the text, but on the map #35 is Pearson Air Museum.
	3-155	3.5.1	Exh 3.5-4, pg 2 of 2	In the text #55, Waterfront Park is identified as <i>senior/low-income</i> and should be <i>park</i>
	3-155	3.5.1	Exh 3.5-4	Exhibit 3.5-4 Community Resources in Washington should also include: (1) St. James Catholic Church; (2) the Land Bridge; and (3) the amphitheater at the Vancouver Landing. Impacts to these resources should be included in the final report.
	3-155	3.5.1	Exh 3.5-4	Add historic sidewalks to list (90 to 100+ years old) and mention elements: contractor stamps, street names, buggy wheel guards, horse rings, etc.
	3-160	3.5.2	Exh 3.5-6	DEIS failed to evaluate the effects of additional traffic generated by park and ride locations and the effects which would impact local schools, parks, and trail connections and impacting bike and pedestrian safety (safe routes to schools). The following specific locations where the analysis is insufficient are as follows: Lincoln Elementary School, Clark College and Hudson's Bay High School, Clark College and Marshall Center, Discovery Middle School and Burnt Bridge Creek trail.
	3-161	3.5.2	1 st paragraph	Is gibberish
	3-161	3.5.2	2 nd paragraph	BRT is not consistent with neighborhood action plans that call for LRT.

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				Change wording from “not as consistent” to “not consistent”
	3-161	3.5.2		Paragraph 4 refers to residential sound insulation as a mitigation measure for noise. Will the cost of the insulation be part of the project costs? Paragraph 5 refers to a few locations where sound walls would not be able to completely mitigate all the traffic-related noise impacts. What additional mitigation is planned for these locations? Also, what mitigation is planned for the Fort Apartments and the Normandy Apartments specifically?
	3-163	3.5.2	Table 3.5-7	Change <i>highly consistent</i> to <i>consistent</i> since neither the DEIS or the neighborhoods tech report document gradations of consistency.
	3-165	3.5.2		Paragraph 2 describes noise impacts to the Smith Tower in the Esther Short Neighborhood. Impacts not addressed are visual impacts and obstruction of sunlight issues at this and other locations.
	3-170	3.5.3		Paragraph 4 mentions a security-minded design for transit stations. This is the only mention in this section of addressing public safety concerns. Long term impacts of crime rates (higher or lower) are not addressed in this section. This should be addressed here if not addressed in another section of the report.
	3-172	3.5.3		The project should avoid displacing residences.
	3-173	3.5.3		The DEIS has failed to identify a feasible noise and vibration mitigation plan for the neighborhood at these locations and for the impacts of the high noise wall upon the neighbors.
	3-172 to 3-174	3.5.3	Long-term impacts of MOS decision	This section should analyze and disclose the traffic impacts of the MOS. Some (how many?) drivers will exit I-5 at Main Street and proceed down it to the park & rides, rather than continuing to exits closer to the bridge because it is a shorter route. This will increase traffic through the neighborhoods.
	3-177 and following	3.5.5	Potential Mitigation Measures	DEIS failed to evaluate impacts of project. No analysis of how construction and bridge (I-5 and east to west facilities) closures will address access and safety by vulnerable road users (high proportion of households without cars)

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				– especially in Vancouver’s City Center. This important item has not been referenced in the text yet.
	3-178	3.5.5	Potential Mitigation for Noise Impacts	Not addressed in this section is mitigation for nighttime construction noise. If construction is scheduled to take place during nighttime hours, there is a need to address how the noise will be mitigated in the neighborhoods. City regulations prohibit noise between the hours of 8:00 pm and 7:00 am. Nighttime noise would require a variance from the local noise ordinance.
	3-179	3.5.5		Mitigating impacts of tolling on low-income populations is a necessity. A program should be in place from the outset of tolling. There is no analysis of the impact on low-income populations, so it is not possible to comment on mitigation.
	3-180	3.5.5	Potential Mitigation for Temporary Effects	Add the following mitigation measure: <ul style="list-style-type: none"> ▪ <u>Seeking input from neighborhoods on unanticipated effects and working cooperatively on mitigation measures throughout the construction period.</u>
3.6: Public Services & Utilities				
	3-184	3.6.1	7	Revise to read, <i>...and water mains that cross I-5 at SE Columbia Way (6”), Fifth Street (12”), McLoughlin Boulevard (20”), Mill Plain Boulevard (18”), McLoughlin Boulevard (20”), Fifth Street, 16th Street E 29th Street (12”), E 32nd Street (10”), 39th Street and 40th Street (24”). A major water line (20”) is located parallel to the western right-of-way line of I-5 between McLoughlin Boulevard and E 16th Street. Additionally, there is a gas main along the entire length of Main Street, as well as a water main and communications tower on the WSDOT Maintenance Facility at 39th and Main.</i>
	3-190	3.6.3	Transit Mode, 2 nd paragraph	Substations to serve the light rail line should be located within buildings or underground.
3.7: Parks & Recreation				
	3-195			The EIS should address planned (future) park, trail, boating, and other recreation improvements – i.e., Gramor Development and extension of the

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				riverfront trail – and how the project could affect those plans. The EIS should also address new opportunities for park, trail, boating and other recreation improvements which could be considered as a result of the CRC project – i.e., new area located below the bridge on the Washington side.
	3-196 and 197	3.7.1	Exhibit 3.7-1 and Exhibit 3.7-2	The inventory of parks and trails is not complete. It omits the Discovery Trail loop that crosses the APE on Evergreen Blvd. as well as along the Columbia. (See attached section of the 2004 VCPRD Paths & Trails Master Plan describing the trail and planned improvements. In addition, see information on the VCPRD website: http://www.cityofvancouver.us/parks-recreation/parks_trails/trails/discovery_loop.htm .)
	3-195	3.7.1		This list includes only regional facilities. Add community and neighborhood parks to list.
	3-196	3.7.1	Ex 3.7-1	DEIS failed to disclose data, or omitted data. In map exhibit add missing north-south street in Delta Park – it's an important low-traffic bike access link to bridge and area paths.
	3-196	3.7.1	Ex 3.7-1	DEIS failed to evaluate or disclose known conditions. Check exhibit for missing path over-crossing (I-5) and under-crossing (Main Street) along I-5 north of 40 th St./Kiggins Bowl.
	3-196	3.7.1	Ex 3.7-1	The names should be Leverich Community Park, Marshall Community Center and Park
	3-198	3.7.1	Ex 3.7-2	The names of the parks are incorrect. They should be Leach Neighborhood Park, Marshall Community Center and Park, Leverich Community Park, Kiggins Sports Fields/Stadium
	3-199	3.7.1		DEIS failed to evaluate known conditions. Large crowds walking along/to I-5 Bridge eastside path during 4 th of July Fireworks. Impacts will occur to the extent this facility is out of service or altered.
	3-199	3.7.1		DEIS failed to evaluate or disclose known conditions. Add mention that the closure of Evergreen Bridge (I-5) will affect access to a special class of local arterial defined as a <i>scenic road</i> .

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	3-199	3.7.1		<p>These additional events that take place in the project area should be listed: Old Apple Tree Festival, numerous events at Marshall Community Center and Park, including the Luepke Senior Center.</p> <p>Although these are the only recreational resources using LWCF funds, open space may have been purchased or conservation/restoration efforts undertaken using LWCF funds through similar programs including the Washington Wildlife and Recreation Program (WWRP), Clark County Conservation Futures Program.</p>
	3-201	3.7.2	Long-Term Effects	DEIS failed to disclose or evaluate known conditions. Significant traffic impacts are expected as a result of the build actions relative to traffic on 39 th Street and the effect on bike/ped access to Burnt Bridge Creek regional trail and Discovery Middle School which is a designated <i>safe schools route</i> .
	3-201 and following	3.7.2	Long-Term Effects	Does not include the Discovery Trail loop that crosses the APE on Evergreen Blvd. as well as along the Columbia. (See attached section of the 2004 VCPRD Paths & Trails Master Plan describing the trail and planned improvements. In addition, see information on the VCPRD website: http://www.cityofvancouver.us/parks-recreation/parks_trails/trails/discovery_loop.htm .)
	3-207	3.7.3	Long-Term Effects	This section should include analysis of the barrier effect of a wider freeway with more cars on it and high sound walls (10 to 18 feet) on the trail connections over it (Discovery Trail and the Seventh Street pedestrian bridge).
	3-207	3.7.3	Long-Term Effects, 1 st full paragraph	The Seventh Street pedestrian connection is very important to the urban trails network, and is included in planned pedestrian improvements in the Vancouver Comprehensive Plan. This connection should be included in the project and any alternative that precludes its development is inconsistent with City plans.
	3-208	3.7.3	Tolling Scenarios	The EIS should include an analysis of the air quality impacts of different tolling Scenarios, particularly related to trails and parks adjacent to I-5 near the tolling stations.

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	3-208	3.7.4	Temporary Effects	Does not include the Discovery Trail loop that crosses the APE on Evergreen Blvd. as well as along the Columbia. (See attached section of the 2004 VCPRD Paths & Trails Master Plan describing the trail and planned improvements. In addition, see information on the VCPRD website: http://www.cityofvancouver.us/parks-recreation/parks_trails/trails/discovery_loop.htm .)
	3-208	3.7.4	Temporary Effects	The EIS should include an analysis of the air quality impacts of construction, particularly on users of trails and recreation facilities adjacent to the project and provide mitigation for any impacts.
	3-210	3.7.5	Potential Mitigation Measures	Does not include the Discovery Trail loop that crosses the APE on Evergreen Blvd. as well as along the Columbia. (See attached section of the 2004 VCPRD Paths & Trails Master Plan describing the trail and planned improvements. In addition, see information on the VCPRD website: http://www.cityofvancouver.us/parks-recreation/parks_trails/trails/discovery_loop.htm .)
	3-210	3.7.5	Potential Mitigation Measures	Construction of a lid over the new freeway from Evergreen Blvd south as far as possible should be included as mitigation for the adverse impacts to the Discovery Trail and degraded pedestrian linkage between downtown and the VNHR.
3.8: Historic & Archaeological Resources				
	3-240	3.8.3	2 nd paragraph	This section should include the negative impacts of the proposed sound wall (16 feet high, located less than 10 feet from the west side of the Post Hospital) on the setting and use of the building (light and air to the first floor and basement would be restricted by the wall). At the least, the last sentence should be changed to read: <i>However, these benefits would be offset if the sound walls alter the historic setting or compromise the use of the buildings adjacent to the wall as seems likely.</i>
	3-252	3.8.5	Potential Mitigation Measures	Second bullet – Stabilization of the Barracks Post Hospital should be listed as mitigation for project effects, not as assistance with restoration efforts. If no restoration were planned, stabilization would be necessary prior to

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				construction in order to ensure that the building is not damaged by the project.
	3-252	3.8.5	Potential Mitigation Measures	Sound walls as high as 16 feet are contemplated as mitigation. However, the VMC allows sound walls only up to 12' high and only when certain conditions are met. A variance would be needed to construct sound walls higher than 12'. If approved, additional mitigation for the impacts of such extraordinarily high sound walls would be necessary. If not, additional mitigation for the noise impacts of the project would be necessary. In any case, mitigation for the impacts of the sound walls alone, no matter how high, will be necessary.
3.9: Visual & Aesthetic Qualities				
	3-259	3.9.1, Greater Central Park Landscape Unit	3 rd paragraph, second to last sentence	Views from I-5 to VNHR and downtown are NOT currently obstructed by berms, sound walls or retaining walls. The Post Hospital and the Academy are landmarks visible from I-5 indicating that you have arrived in historic downtown Vancouver.
	3-259	3.9.1, Burnt Bridge Creek Landscape Unit	5 th paragraph, last sentence	As you cross Burnt Bridge Creek, the roadway is higher than the vegetation and the traveler can clearly see the creek valley.
	3-260 and following	3.9.2	Long-Term Effects	This section does not include the impacts of proposed mitigation measures, as required. Views from I-5 to downtown and the VNHR, as well as views from downtown to VNHR and vice versa would be adversely affected by construction of sound walls (proposed at 10 to 18 feet high). Where there are currently no walls, the highway will be twice as many lanes, landscaping will be eliminated through downtown and replaced by high sound walls, heightening the barrier effect of the freeway.
	3-261	3.9.2	Exh. 3.9-8	The description of potential impacts on the Vancouver Downtown Landscape Unit and the Central Park Landscape Unit should disclose the visual impact of proposed sound walls
	3-261	3.9.2, Long-Term Effects	Alternative 3	Substations to serve the light rail line should be located within buildings or underground.

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	3-261	3.9.2	Transit Views	Because many more buses would be running with BRT, buses would be constantly in view (and making a lot of noise) changing the view and experience of the streets that they would run on.
	3-261 to 264	3.9.2	Exh. 3.9-9, 3.9-10, and 3.9-11	These exhibits do not include the impacts of proposed mitigation measures, as required. Views from I-5 to downtown and the VNHR, as well as views from downtown to VNHR and vice versa would be adversely affected by construction of sound walls (proposed at 10 to 18 feet high). Where there are currently no walls, the highway will be twice as many lanes, landscaping will be eliminated and replaced by high sound walls, heightening the barrier effect of the freeway.
	3-263	Alternative 4	Exh 3.9-10	The visual effects summary table breaks the Vancouver downtown core from the Columbia River Waterfront and from the Greater Central Park Landscape, yet they are all part of the same <i>environment</i> . It is not appropriate simply to evaluate each one independently and conclude that there is no significant impact. The real impact comes with the cumulative impacts to each of the locations, such that the fundamental character of the areas that make up Vancouver's core is changed by the cumulative impacts of the project—and the proposed project mitigations. In large part, Vancouver is building its economic development model and revival around the themes of its important role in the region's historical development. The EIS should present an evaluation of the complete effect of project implementation for each alternative, in the context of Vancouver's adopted plans and policies to determine what the real project impacts are. Independent assessment of individual landscape units or property acquisitions does little to disclose information on this more important question.
	3-263 to 264	3.9.2, Long-Term Effects	Alternative 5	Substations to serve the light rail line should be located within buildings or underground.
	3-264 to 267	3.9.3	Long-Term Effects of Bridge	One beneficial impact of the replacement bridge option is that it could result in re-establishing the visual connection from downtown to the Columbia River and along the north shoreline from east to west where it is currently

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			Replacement	obstructed by the bridge. This benefit would not occur with the supplemental bridge.
	3-267 to 268	3.9.3	Long-Term Effects	The description of potential impacts on the Vancouver Downtown Landscape Unit and the Central Park Landscape Unit should disclose the visual impact of proposed sound walls.
	3-266		Exh 3.9-13	DEIS failed to evaluate or disclose known conditions. In exhibit 3.9-13 the ped and bike facility is missing.
	3-267		Exh 3.9-14	DEIS failed to evaluate or disclose known conditions. In exhibit 3.9-14 the ped and bike facility is missing.
	3-269	3.9.3, Long-Term Effects	4 th paragraph	DEIS failed to evaluate or disclose known conditions. The installation of LRT guideway with on-street parking will not allow the planned addition of bike lanes along upper Main Street (from Fourth Plain to the north). See CoV TSP Bike Framework Plan. http://www.cityofvancouver.us/upload/contents/500/bicyclemap.pdf
	3-269	3.9.3, Long-Term Effects	4 th paragraph	DEIS failed to evaluate or disclose known conditions. There is no discussion or exhibits of how any proposed HCT lane configurations affect bike access east to west across the affected intersections – especially if parking, multiple/additional turn lanes or station areas are added. See CoV TSP Bike Framework Plan. http://www.cityofvancouver.us/upload/contents/500/bicyclemap.pdf
	3-271	3.9.3, Two-way Broadway or Broadway-Main Couplet	1 st paragraph	DEIS failed to sufficiently analyze expected visual and aesthetics impacts to City streets and neighborhoods. The following conclusion is written in error <i>...no substantial difference in visual effects between the two-way Broadway and Broadway-Main couplet alignment options</i> . Parking will be affected and the single-track option will make the LRT track way less dominant within a narrow right-of-way. (Much as is currently used in Old Town/Chinatown, 5 th and 6 th Avenues alignment.). Insufficient resolution of the aesthetic impact is proposed.
	3-272	3.9.5	Potential Mitigation	Add the following mitigation measures: <ul style="list-style-type: none"> ▪ <u>Substations to serve the light rail line should be located within</u>

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			Measures	<u>buildings or underground.</u> <ul style="list-style-type: none"> ▪ <u>Adopt UDAG recommendations as mitigation for visual impacts.</u>
3.10: Air Quality				
	3-273	3.10		Please address air quality impact on bike and ped traffic for each bridge scenario – especially given the distances bike and peds will be away from automotive and BRT traffic.
	3-280 to 3-281	3.10.2		There is a complete failure to analyze the impacts of the park and ride facilities proposed for lower downtown, the Mill Plain District, Clark College, and Lincoln. Detailed air quality analysis would include all local traffic circulation, plus that added for ingress/egress to the park and ride lots and stations, and the impact of buses on congestion, traffic circulation, and emissions. This evaluation is completely lacking and renders this section insufficient to identify and evaluate the potential impacts of the proposed alternatives.
3.11: Noise & Vibration				
	3-287	3.11		DEIS failed to evaluate known conditions. Failed to assess the noise impact on bike and ped traffic for each bridge and HCT scenario – especially given the distances bike and peds will be away from automotive and HCT lanes. Investigate track sections with sharper curves and with and without track lubricators.
	3-287	3.11		DEIS failed to evaluate known impacts of implementing proposed mitigation. No analysis of affect on noise in the areas surrounding the BIA if sound walls are installed and sound bounces off new sound walls.
	3-290 to 291	3.11.1, What are City Noise Standards?	Paragraph 2	This is correct except for the assertion that the City of Vancouver’s noise standards do not apply to public streets and sidewalks. What does this mean? Please clarify. The noise from normal vehicle use of public streets regulated under WAC 173-62 is exempt, but sidewalks are not.
	3-310	3.11-21		Check actual locations of marked residences affected – some may be in the wrong location and others may no longer be residences.

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	3-314 to 315	3.11.5	Potential Mitigation for Long-Term Effects	Sound walls as high as 16 feet are contemplated as mitigation. However, the VMC allows sound walls only up to 12' high and only when certain conditions are met. A variance would be needed to construct sound walls higher than 12'. If approved, additional mitigation for the impacts of such extraordinarily high sound walls would be necessary. If not, additional mitigation for the noise impacts of the project would be necessary in addition to mitigation for the impacts of the sound wall itself, no matter how high it is.
	3-315	3.11.5, Potential Mitigation for Long-term Effects	Fort Vancouver	This paragraph should also say <i>However, a 16-foot high sound wall located less than 10 feet from the west side of the historic Post Hospital building would have a substantial adverse visual and aesthetic effect on the VNHR and the use of the building.</i>
	3-315	3.11.5	Potential Mitigation for Traffic Noise	Residential insulation is contemplated as a mitigation strategy. The project should bear the cost of residential insulation for all affected residences.
	3-315	3.11.5	Potential Mitigation for Traffic Noise	Please address additional energy costs for A/C use in homes with improved windows if mitigation is made for sound problems (residents may be less likely to open windows for fresh free air due to traffic or HCT noise).
	3-315 to 3-316	3.11.5	Potential Mitigation for Transit Noise & Vibration	Install trackside lubricators at curves before completing project – do not wait for noise complaints.
	3-316	3.11.5, Potential Mitigation for Temporary Effects	Last Bullet	Monitoring alone is not acceptable for an historic resource where there is risk of damage to historic features. The building should be reinforced in advance to avoid damage to the Post Hospital from construction of I-5 improvements.
3.12: Energy				
				Energy demand for the various scenarios' construction and operation are estimated separately. Tolling scenarios are not analyzed openly or presented understandably. The complete picture of energy demand for each of the

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				alternatives is not drawn. Energy demand is an important issue in this project and should be treated clearly and forthrightly.
	3-323	3.12.3, Tolling Scenarios		The individual tolling scenarios are not identified, nor are their individual analyses provided. The discussion is confusing because all the background information is missing. The discussion implies that tolls were studied on the I-5 bridges and also on the I-205 bridges, but does not provide any factual information for the reader to understand what scenarios were analyzed and how the results were derived. Information about whether tolls would apply to both sets of bridges and how (equally or not, at the same time or not, etc.) needs to be included here, even if it is contained in another part of the document. If it is contained in another part of the document, at the very least, a reference to that part should be inserted here. Currently, there is no way for the reader to make sense of this discussion.
	3-323	3.12.3, Tolling Scenarios	Last paragraph on page	Is incomplete.
3.13: Electric & Magnetic Fields				
	3-329	3.13.2 & 3.13.3		Why do these paragraphs focus on the occupational exposure guidelines rather than the general public exposure guidelines? It appears that the EMF levels are also below the general public guidelines and those are most important for the project.
3.14: Ecosystems				
	3-337	3.14.1, Protected Species	Last line on page	It is against Washington state law to divulge the locations of WS Priority Species. Please do not divulge the location of the Peregrine Falcons: <i>...Peregrine falcons utilize the existing bridge structure year-round.</i>
	3-342	3.14.2	Alt 1: No Build, middle of 1 st paragraph	It is against Washington state law to divulge the locations of WS Priority Species. Please do not divulge the location of the Peregrine Falcons: <i>...The bridge structure used by peregrine falcons <u>raptors</u> would remain.</i>

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	3-343	3.14.2	Exh 3.14-10, left-hand column	It is against Washington state law to divulge the locations of WS Priority Species. Please do not divulge the location of the Peregrine Falcons: <i>Peregrine Raptor Habitat</i>
	3-344	3.14.2	Alt 2	1 st two lines on page are repeated from page before – makes it very confusing to read. At first glance it looks like a page is missing.
	3-344	3.14.2	Alt 2, middle to end of 3 rd full paragraph	It is against Washington state law to divulge the locations of WS Priority Species. Please do not divulge the location of the Peregrine Falcons: ... <i>with the exception of peregrine falcons raptors that utilize the existing bridge. The new bridge design will likely not include towers or other large structures above the roadway deck and may not provide suitable raptor habitat for these birds. Without suitable mitigation, the falcons raptors could leave the area.</i>
	3-345	3.14.2	Alt 3, Exhibit 3.14-11, left-hand column	It is against Washington state law to divulge the locations of WS Priority Species. Please do not divulge the location of the Peregrine Falcons: <i>Peregrine Raptor Habitat</i>
	3-346	3.14.2	Alt 4, Exhibit 3.14-12, left-hand column	It is against Washington state law to divulge the locations of WS Priority Species. Please do not divulge the location of the Peregrine Falcons: <i>Peregrine Raptor Habitat</i>
	3-347	3.14.2	Alt 4, 1 st full paragraph	It is against Washington state law to divulge the locations of WS Priority Species. Please do not divulge the location of the Peregrine Falcons: ... <i>with the exception of peregrine falcons raptors that utilize the existing bridge.</i>
	3-348	3.14.2	Alt 5, Exhibit 3.14-13, left-hand column	It is against Washington state law to divulge the locations of WS Priority Species. Please do not divulge the location of the Peregrine Falcons: <i>Peregrine Raptor Habitat</i>
	3-352	3.14.4	Plants & Animals, 1 st sentence of 2 nd paragraph	It is against Washington state law to divulge the locations of WS Priority Species. Please do not divulge the location of the Peregrine Falcons: <i>Construction could substantially disturb the peregrine falcons raptors using or potentially using the existing bridge structure.</i>
	3-353	3.14.5	Last	It is against Washington state law to divulge the locations of WS Priority Species. Please do not divulge the location of the Peregrine Falcons:

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			paragraph	<i>...Platforms could be built to mitigate for the replacement crossing's removal of the peregrine falcon potential raptor habitat.</i>
3.15: Wetland & Jurisdictional Waters				
	3-355	3.15	Jurisdictional wetlands	The Draft EIS limits the identification and study of wetlands to those that are "jurisdictional" or regulated by the Corps. However, there are wetlands that the Corps would not regulate, but the City of Vancouver and the State of Washington would. For example, there is a string of small wetlands along Burnt Bridge Creek, to the east of I-5, directly across from the Kiggins Bowl wetland and south of the wetlands the Draft EIS refers to as the "Burnt Bridge Creek Wetlands." These wetlands and their buffers could be directly or indirectly impacted by the project. These wetlands and buffers would be regulated under the City's Critical Areas Protection code (VMC 20.740) and also under the City's Shoreline Management Master Program (VMC 20.760). Impacts to these wetlands and buffers needs to be analyzed in the EIS and mitigation identified for any unavoidable impacts. This analysis is necessary for the EIS to be in compliance with and used to satisfy SEPA requirements.
3.16: Hydrology & Water Quality				
				Vancouver is opposed to traditional surface stormwater facilities within the project, particularly treatment or detention facilities west of I-5, including Main Street, the SR-14 interchange, and Waterside areas because that would not be consistent with the Vancouver City Center Vision and City policy. There may be opportunities east of I-5 for stormwater facilities to be developed as urban amenities (such as terraces and rain gardens) that feed into and enhance the landscape restoration planned by the National Park Service.
				We note that this chapter addresses primarily water quality with very little attention to hydrology. Please include a statement that neither Oregon nor Washington regulations require flow controls for the Columbia River. This was stated in the Hydrology & Water Quality Technical Report, and should

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				be restated in this chapter.
				The project should be planning for compliance with the new NPDES permit requirements.
	3-380	3.16.1	Exh 3.16-2	This exhibit is too small to clearly discern the relationship between the project and the floodplains of the Columbia River and particularly of Burnt Bridge Creek north of SR-500. At the current level of detail visible, this exhibit does not support the statements in the 3 rd paragraph on pg 3-383.
	3-383	3.16.1, Burnt Bridge Creek	3 rd paragraph	These statements are not supported by Exhibit 3.16-2 because there is not enough detail to clearly see that <i>This project would not extend into the 100-year floodplain of this stream.</i>
3.17: Geology & Soils				
	3-395	3.17.1 and Exhibit 3.17-1	Last paragraph on this page	While we recognize that the Relative Earthquake Hazard Map (REHM) is a map that was developed by DOGAMI and WDNR together and therefore makes consistent analysis on both sides of the river possible, it is important to note that it dates from about 1994 and has been replaced in Washington by updated maps that are considered the “best available science” under GMA. The City of Vancouver’s regulations are based on these new maps: (1) <i>Alternative Liquefaction Susceptibility Map of Clark County, Washington based on Swanson’s Groundwater Model</i> by Stephen P. Palmer, Sammantha L. Magsino, James L. Poelstra, and Rebecca A. Niggemann, September, 2004, as revised or superseded; and (2) <i>Site Class Map of Clark County, Washington</i> by Stephen P. Palmer, Sammantha L. Magsino, James L. Poelstra, and Rebecca A. Niggemann, September, 2004 as revised or superseded. EIS analysis should include any differences between the REHM and the new maps to be consistent with the Growth Management Act requirements and City of Vancouver regulations, and to be in compliance with and used to satisfy SEPA requirements.
	3-402	3.17.3	1 st paragraph on this page	<i>Park and ride structures could include underground parking. Deeper excavation is more likely to encounter groundwater. There is greater potential for this risk at the Kiggins bowl park and ride facility. Facilities would need to be designed to avoid leaks into or flooding of the lower levels</i>

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				<p><i>which could impact groundwater resources.</i></p> <p>This paragraph should reiterate in stronger, more straightforward language that the groundwater that could be impacted by excavation and operation of the park and ride facilities is the same groundwater that Vancouver's citizens drink. The entire city area is a Critical Aquifer Recharge Area under the Growth Management Act. Discharges to groundwater, stormwater, or surface water such as the potential leaks and floods contemplated in this paragraph are specifically prohibited under VMC 14.26, Water Resources Protection. The risk of groundwater and surface water contamination should be quantified or at least expressed in a qualitatively measure and mitigation measures should be identified and analyzed in the EIS. This work is also necessary to satisfy SEPA requirements.</p>
	3-402	3.17.4	2 nd paragraph	De-watering is a potential mitigation measure, and its efficacy should be discussed and analyzed. Avoidance, however, has not been mentioned and must be the first option. Groundwater contamination could be avoided by not building the park and ride structures deep enough to contact groundwater.
3.18: Hazardous Materials				
				NO COMMENTS
3.19: Cumulative Effects				
	3-421	3.19		General comment on cumulative effects. Cumulative effects also include the cumulative effects of all of the CRC project components, including the potential mitigations for identified impacts. These are not addressed in this section and, where they are addressed in other locations within the document, are inadequate to draw informed conclusions regarding cumulative project impacts to Vancouver.
	3-423	3.19, Recent Development	Second bullet	Heritage Place is a mixed use (residential and commercial) development.
	3-426	3.19.2, Economics		Here again there is no discussion of the cumulative impacts of the CRC project itself on economics—when aesthetic, air quality, construction,

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				acquisition, traffic, and other impacts are all combined, what is the impact to the viability of achieving the planned growth in Vancouver's downtown core? There is no way to tell from the information presented.
	3-427	3.19.3, Environmental Justice	2 nd paragraph	Although the right-of-way would not be significantly increased, it is incorrect to say that the roadway would only be slightly widened. It will double in size, eliminating landscaping and replacing it with retaining walls and sound walls. The freeway will no longer be an edge between neighborhoods, it will be a substantial barrier visually (eliminating views across it) and making crossing it an even more unpleasant experience.
	3-428		1 st paragraph	Doubling the number of lanes on the freeway will eliminate landscaping along its edges through downtown – a change in use from landscaping to roadway, that when coupled with the huge sound walls will significantly affect land uses along it and create a barrier between neighborhoods.
	3-429		3 rd paragraph	4 th sentence. The CRC project will not improve access across I-5, especially for pedestrians and bicyclists. The widening will double the number of lanes that have to be crossed, eliminating all the landscaping along the edges and replacing them with huge sound walls. This will be a barrier, not a benefit to pedestrians on the Discovery Trail. Unless the project includes the planned 7 th Street overcrossing, it will effectively preclude development of this pedestrian link between downtown and VNHR.
	3-433	3.19.9, Long-Term Impacts		This section should also discuss the role of lower-speed, low emissions vehicles, and how they will be served in the future to accommodate short trips, and how the CRC project will aid or preclude these use of that technology.
	3-439	3.19.11, Energy & Peak Oil		This section should note that none of the alternatives are being designed to accommodate lower-speed hybrid or electric vehicles, or mopeds, or scooters, or similar lower-speed conveyances.
	3-441	3.19.14, Historic Resources		The impacts to historic resources will be substantial as currently designed, particularly the negative impacts of the proposed sound wall (16 feet high, located less than 10 feet from the west side of the Post Hospital) on the

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				setting and use of the building (light and air to the first floor and basement would be restricted by the wall).
	3-441	3.18.15, Parks & Recreation Areas		This section does not evaluate the impacts to the Discovery Trail that crosses the area on Evergreen Blvd as well as along the Columbia River. The statement that the project will have minimal impact on bicycle and pedestrian access across I-5 is not true or justified by any analysis. Doubling the width of the freeway, eliminating landscaping and replacing it with retaining walls topped by 16-foot sound walls, without improving east-west links across it will worsen access from downtown to the VNHR. The proposed interchange design at Mill Plain will make pedestrian and bicycle access under the freeway more difficult and dangerous. These are in no way “small” impacts on trails or bicycle and pedestrian access to the parks on either side of I-5.
	3-441 & 442	3.19.16, Visual Quality & Aesthetics		This section should include the impacts of the sound walls and of eliminating landscaping on views from I-5 and across I-5 between downtown and the VNHR.
CHAPTER 4:				
Financial Analysis				
				This section does not include an impact analysis. The incidence of the benefits and burdens of the project financing scenarios have to be disclosed. Additionally, the impact to funding other, ongoing, and planned regional improvements, such as those planned along SR-14, SR-500, and I-205 need to be disclosed and evaluated for impact. Without an impact analysis it is impossible to identify impacted populations, facilities, and resources; and to determine what, if any, mitigation may be appropriate. For example, do the tolling alternatives have a disproportionate impact on low-income populations? What about other taxing scenarios? Is an increase in the regressive sales tax equitable, or does it impose a disproportionate burden on low income populations to fund LRT improvements that will serve high-income suburban commuters? The information to answer these and other

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				questions must be disclosed so that impacts and mitigations can be identified.
CHAPTER 5: Draft Section 4(f) Evaluation				
				<p><u>Post Hospital</u></p> <p>The replacement bridge option widens the freeway to 12 lanes and moves the freeway to within 14-16 ft of the west wall of the post hospital.</p> <ul style="list-style-type: none"> ▪ The proposal to mitigate the increased noise at the Hospital is a 16' sound wall. The sound wall option doesn't appear to take into consideration the reuse plans for the building (which were approved by the Vancouver City Council in the 2002 West Barracks Reuse Plan). The Hospital is scheduled to be an arts facility with galleries and a black box theater but primarily artist studios. A 16' high sound wall will be visually unattractive and will severely restrict the natural light entering the rooms on the lower floors of the west side of the building (where many of the studios would be located). Both of these impacts will make the space difficult to reuse as planned. Consideration needs to be given to a solution to the increased sound that will be visually appealing and of key importance, not block the natural light. ▪ Chapter 5, pg 17 notes that the Historic Reserve plans call for the removal of Anderson Street and proposes that the CRC's removal of Anderson as it runs behind the hospital helps meet this objective. This information is incorrect. As the attached map indicates, the plans are to remove the curvilinear portion of Anderson Street between Fort Vancouver Way and Barnes Road not the portion that runs behind the hospital. That section was scheduled to remain and be reconfigured to provide additional parking and a more landscaped buffer between the West Barracks and I-5.
				<u>VNHR/Downtown Connection</u>

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				<p>A 12 lane freeway will significantly widen the divide between downtown Vancouver and the Historic Reserve. Part of the future success of the Reserve as a tourist attraction depends on the ability of pedestrians to access the Reserve from downtown. The National Park Service General Management Plan and the VNHR Long Range Plan both call for a pedestrian bridge over I-5 at 7th Street. The DEIS mentions a “connector/cover” between Evergreen and 5th Street. This was originally proposed by various interests in Vancouver as a way to protect the hospital and other West Barracks buildings from the noise and visual impacts of the widened freeway in addition to providing a stronger connection to downtown. Subsequent information indicated that due to the slope of the freeway, a cover would be limited in size. Located adjacent to the current Evergreen Blvd. freeway crossing, it would only reach to the north end of the hospital and would do little to mitigate the effects of the freeway on the Hospital or other West Barracks buildings. A better solution would be a series of integrated connectors at 5th, 7th and Evergreen that would a) link the Reserve to downtown in a number of locations for a more seamless reconnection b) could be designed in such a way that it would serve as a dramatic “gateway” to Vancouver.</p>
				<p><u>Carnegie Library/Clark County Historical Museum</u> DEIS failed to analyze the following potential impacts to the Carnegie Library/Clark County Historical Museum. The effects of construction, continued operation of a transit guideway, and impacts to adjacent parking will have a significant and adverse affect on the integrity of the property, building and historic artifacts stored within the building. In particular:</p> <ul style="list-style-type: none"> ▪ The building has an unreinforced masonry block foundation. This foundation may fail or may be jeopardized due to vibration associated with construction of the transit element. This foundation will also sustain prolonged exposure to vibration associated with activation and use of an LRT transit guideway and may fail or be structurally jeopardized as a result. ▪ The building has no HVAC ventilation system for interior air circulation

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				<p>and air conditioning. The building is very susceptible to contamination related to dust and related construction induced air impacts. The museum hosts a permanent collection of historical records and artifacts. These records are easily contaminated. No analysis of the potential impacts to the displayed or archived materials resulting from construction dust or other induced air impacts was evaluated, nor was a mitigation plan for preventing or abating those impacts proposed.</p> <ul style="list-style-type: none"> ▪ The building has no HVAC ventilation system for air conditioning. Therefore it is very susceptible to outside noise when windows are opened for ventilation. The DEIS failed to analyze the increased noise levels that will be present within the building related to project actions. ▪ The building has single-pane windows which are very susceptible to noise impacts. The DEIS failed to analyze the increased noise levels associated with construction and permanent operation of the proposed adjacent transit systems due to the limited window sound insulation present in the existing window. ▪ The building has a sole ADA parking spot adjacent to building on W 16th Street. DEIS failed to recommend a satisfactory remedy to the loss of parking - in particular, the ADA parking space - adjacent to the museum building.
				<p><u>Marshall Community Center & Park</u> DEIS failed to sufficiently analyze impacts related to construction of a light rail transit stop on McLoughlin in front of the Marshall Community Center.</p> <ul style="list-style-type: none"> ▪ Marshall Community Center was updated and the building renovated. The renovations included modifications to the ADA and other parking spaces in front of the building. Additionally, building frontage modifications included a new sidewalk and landscaping. The project did not evaluate the impact of the current designs relative to the newly-configured building and parking layout. Nor did the project recommend mitigations resulting from direct impacts of building a bus-bay in front of the building and the resulting encroachment upon the parkland.

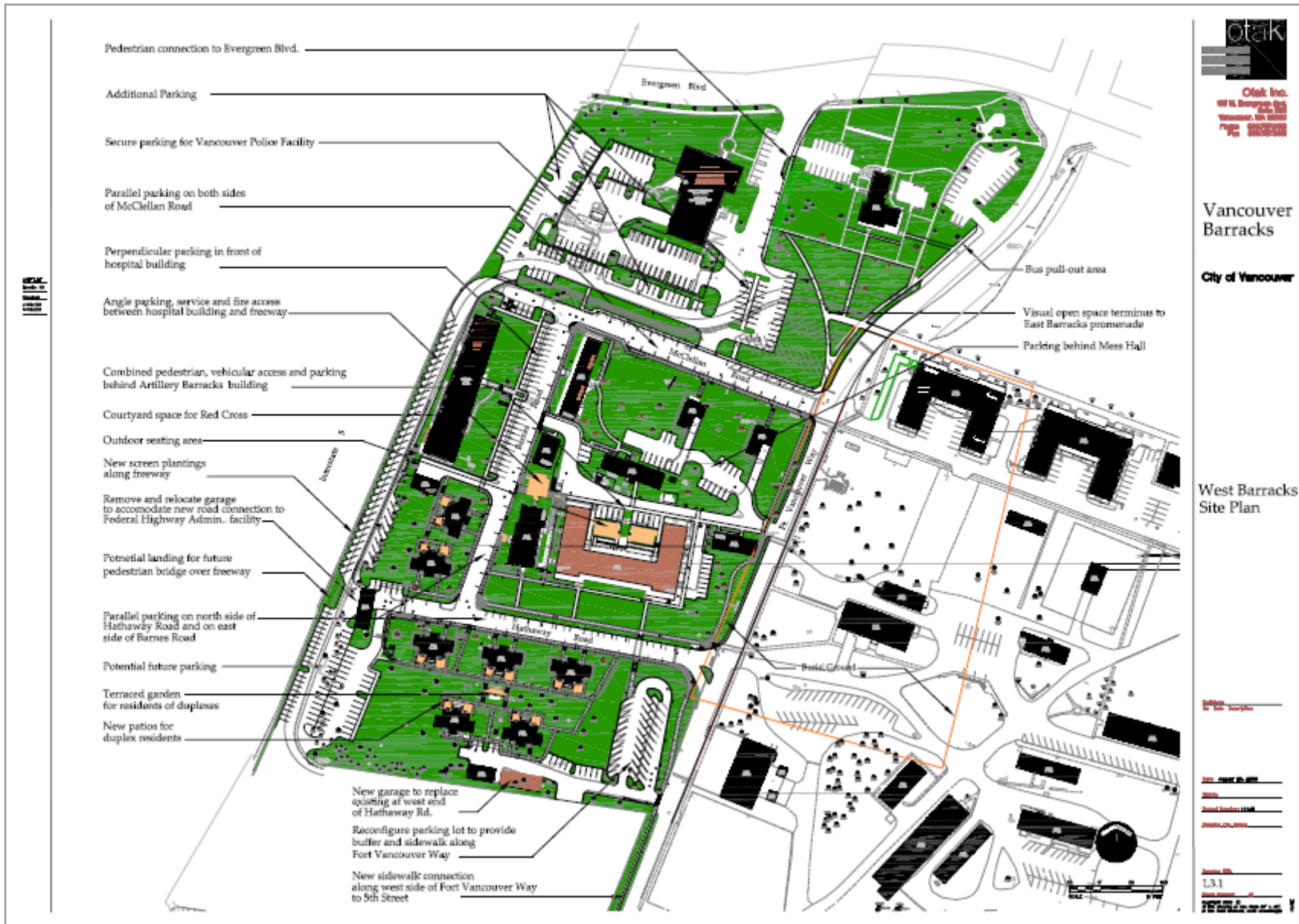
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CHAPTER	PAGE	SECTION	LINE	COMMENT
				<p><u>Old Apple Tree Park – Heritage Tree</u> DEIS failed to analyze built environment, noise, construction air quality and vibration impacts and post-construction shadows and visual impacts to the Old Apple Tree Park – Heritage Tree. The project will adversely affect the presence of the park through substantial alteration of the landscape and setting and cultural landscape. Years of City resident, business, and stakeholder initiatives have focused on connecting and enhancing the cultural, historic and interpretive landscape of Vancouver, and preserving historical resources and landscape elements. Much of that focus has been the process of enhancing the resources and landscape through restorative efforts and creating physical connections which tie the individual elements into a cohesive interpretive experience. The DEIS fails to consider the cumulative impacts to this effort through the assessment of each site in isolation and not as a cohesive whole. Additionally, the DEIS fails to disclose any direct impacts related to construction of physical elements or structures. No mitigations for these impacts have been identified.</p>
				<p><u>Waterfront Park</u> DEIS failed to analyze built environment, noise, construction air quality and vibration impacts and post-construction shadows and visual impacts to Waterfront Park. The project will adversely affect the presence of the park through alteration of the landscape and setting and cultural landscape. Years of City resident, business, and stakeholder initiatives have focused on connecting and enhancing the cultural, historic and interpretive landscape of Vancouver, and preserving historical resources and landscape elements. Much of that focus has been the process of enhancing the resources and landscape through restorative efforts and creating physical connections which tie the individual elements into a cohesive interpretive experience. The DEIS fails to consider the cumulative impacts to this effort through the assessment of each site in isolation and not as a cohesive whole. Additionally, the DEIS fails to disclose any direct impacts related to construction of physical elements or structures. Rather, it suggests that physical impact locations are yet to be determined which suggests they are</p>

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CHAPTER	PAGE	SECTION	LINE	COMMENT
				likely, and thus the DEIS failed to analyze potential impacts. No mitigations for these impacts have been identified.
	5-4	Exh. 5.2-1		<ul style="list-style-type: none"> ▪ Entry #2 - The name of the park is Waterfront Community Park and it extends under the current I-5 bridge to include the Discovery boat sculpture. ▪ Entry #5 – The name of the park is Old Apple Tree Park and Historic Site ▪ Entry #8 – The name of the park is Leverich Community Park
	5-17	5.2.3, VNHR Plans		Removing Anderson Street and replacing it with landscaping is IN NO WAY the same as removing it by converting it to I-5 roadway and topping it with a 16-foot sound wall less than 10 feet from the edge of the Post Hospital. Thus the statement that the proposal is consistent with this goal is disingenuous and false.
	5-17	5.2.3, VNHR Plans	Last paragraph	The second sentence should indicate that the 7 th Street overcrossing is part of the adopted circulation plan in the Vancouver Comprehensive Plan, not just that the city would like to construct it.
	5-19	5.3.1	Exhibit 5.3-1	Impacts to the Discovery Loop Trail are not included. (See attached section of the 2004 VCPRD Paths & Trails Master Plan describing the trail and planned improvements. In addition, see information on the VCPRD website: http://www.cityofvancouver.us/parks-recreation/parks_trails/trails/discovery_loop.htm .)
	5-19	5.3.1	Exhibit 5.3-1	Vibration and visual impacts to the Post Hospital are not described, but could be significant.
	5-47			The DEIS does not include an analysis of the project's impacts to the Discovery Loop Trail which crosses I-5 on Evergreen Blvd and Columbia/Columbia Way. The impact analysis should include the disruption caused by construction and noise, air quality and aesthetic impacts to the trail user during construction and when complete.
	5-48	5.3.3	Waterfront Park	Any encroachment on the Waterfront Park, the Waterfront Renaissance Trail, and the Boat of Discovery Monument, whether in the air, or with a

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				pier, would be an impact to an important Vancouver 4(f) resource.
	5-49			This section should include an analysis of the impacts to Leverich Community Park and the roads and sidewalks used to access the park, particularly during construction.
	5-51	5.3.4, Potential Constructive Uses		Constructing the freeway to within 10 feet of the Post Hospital and topping the retaining wall with a 16-foot sound wall would block light and air to the first floor of the building and basement and make it impossible to complete VNHR plans to create a landscape buffer between I-5 & the building. This would substantially impair use of the building, its visual setting and implementation of the VNHR long range plan.
	5-60	5.5.3, Minimizing Harm		The following resources should be included in the list of 4(f) resources potentially affected by the project. The project impacts to them should be evaluated: <ul style="list-style-type: none"> ▪ Marshall Community Center and Park ▪ Leverich Community Park ▪ Discovery Loop Trail
	5-64	5.5.3, Minimizing Harm	3 rd paragraph	Removing Anderson Street by replacing it with landscaping as is planned in the VHNR Master Plan, is IN NO WAY the same as removing it by converting it to I-5 roadway and topping it with a 16-foot sound wall less than 10 feet from the edge of the Post Hospital. Thus the statement that the proposal is consistent with this goal is disingenuous and false.
	5-65	5.5.3, Minimizing Harm	Shift Replacement Crossing to Intermediate Alignment	Vancouver supports shifting to the Intermediate Alignment if it is not possible to narrow the roadway by eliminating at least one auxiliary lane adjacent to VNHR.
Appendix D: Comprehensive List of Potential				

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CHAPTER	PAGE	SECTION	LINE	COMMENT
Property Acquisitions				
	D-3			The following serial numbers should have a leading zero making the eight-digit number into a nine-digit number:
			<u>038279920</u>	Marshall Community Center
			<u>038279927</u>	Land Bridge
			<u>038279934</u>	Marshall Community Park
			<u>038279935</u>	Old Apple Tree Park & Historic Site
			<u>011405000</u>	Leverich Community Park
			<u>011531000</u>	Leverich Community Park
			<u>011538000</u>	Leverich Community Park
			<u>038279920</u>	Marshall Community Center
			<u>038279934</u>	Marshall Community Center



PROJECT 3: Discovery Loop / Central City

This project includes the Discovery Historic Loop and other trail segments that are in the central city area of Vancouver. The recently completed Discovery Historic Loop offers many historic and scenic attractions along the 2.3-mile trail. The Loop begins on East Evergreen and winds through Fort Vancouver National Historic Site, Officer's Row, and downtown Vancouver, joining the Waterfront Renaissance Trail at Vancouver Landing. Sights along the way include Fort Vancouver, Pearson Air Museum, Providence Academy and Esther Short Park. Although construction of the trail is complete, a number of trail amenities such as benches and signage are recommended to realize the full potential of the Loop. Additionally, a connection with the Amtrak station and a land bridge through Old Apple Tree Park are recommended to create a larger loop connecting this path with the Columbia River and central city areas. The numbering of segments in this section starts with the Discovery Loop and then runs from south to north beginning at I-5 and the Columbia River.



Figure III-4: Project 3, Discovery Loop / Central City

SECTION III

Segment 3A: Discovery Historic Loop

~4.8 miles

Improvement Type

Trail upgrades including addition of amenities such as signage and benches

Route

Evergreen Blvd. to E Reserve, to E 5th St. through Keiwit, under SR-14 to Central River Reach, to Old Apple Tree Park, to E 5th St.

Description

The Discovery Historic Loop Trail offers a diversity of cultural and historical experiences to walkers and bicyclists in Vancouver. This urban trail traverses through Downtown Vancouver, the Fort Vancouver National historic site, Officers Row national Historic District, and along the Columbia River waterfront. The Discovery Historic Loop also provides a transportation route for bicyclists and pedestrians traveling east of downtown.



Pioneer Mother statue



Officers Row



Capt. Vancouver Plaza sign



Underpass at Old Apple Tree Park

RECOMMENDED IMPROVEMENTS



Vancouver's Discovery Historic Loop



Public art at the waterfront



Evergreen Arboretum

SECTION III

Segment 3B: SR 14 Overpass- Land Bridge **~0.8 miles**

Improvement Type

Develop Landbridge

Route

5th Street to Waterfront Park

Description

Proposed Landbridge to connect 5th Street to Waterfront Park through Apple Tree Park. The Landbridge reinstates the vital, historic connection between Fort Vancouver National Historic Reserve and the river edge, and establishes a gateway to the City of Vancouver.

Typical Treatment

Concept plan for Landbridge courtesy of Jones & Jones, Maya Lin Confluence Project/ Ft. Vancouver:

