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JUL 01 2008

**Hand Delivered****Columbia River Crossing**

Columbia River Crossing Project

C/o Heather Gundersen, Environmental Manager

700 Washington Street, Suite 300

Vancouver, WA 98660



Dear Ms Gundersen;

The following are the comments of the Lincoln Neighborhood Association (LNA) on the Columbia River Crossing (CRC) Draft Environmental Impact Statement (DEIS). The LNA has been involved in numerous meetings with CRC Staff, Vancouver City Staff and other Neighborhood Associations in Vancouver during the past year. We have conducted a survey of the 1500 households in the LNA with responses back from over 10% of the households in the LNA. Our Transportation Committee has met many times to prepare materials for LNA meetings, interview CRC and Vancouver Transportation Department staff about the project, develop the household survey and prepare LNA position statements such as these comments. We would like to thank the CRC and City Staff members for their help and expertise in reviewing the project alternatives, especially the alternatives with the most impact on our neighborhood.

In 1998 the LNA submitted our Neighborhood Action Plan to the City and the Vancouver City Council accepted it at that time. The following three paragraphs are from that Plan

*Lincoln is a neighborhood with a long history. A place of homes, schools, churches, and some businesses. Lincoln is a neighborhood of people which are long-time residents and new comers; apartment dwellers and home owners; singles, young families and homes with teen-agers, empty nesters, and senior citizens; and we are all individuals, entitled to our own aims, ways, peace, and safety.*

*The neighborhood is primarily single family in nature and represents a mature urban neighborhood with tree lined streets although some multifamily apartments reside in the neighborhood as well. The portion of the neighborhood next to the railroad tracks supports light and medium industrial uses. The neighborhood supports a variety of housing styles and ages from new sub-divisions such as Columbia Crest to homes built in the 1930's. There are commercial interests in the neighborhood such as two small markets, various office buildings including Washington State Department of Transportation, and medical and dental offices.*

*Discovery Middle School and Lincoln Elementary are situated within the neighborhood. Lincoln Elementary has many recreational amenities such as tennis courts, soccer fields and a playground. There are two additional open spaces; a small neighborhood park called Hidden Park and another small area located to the east of Washington Street yet undeveloped. Hidden Park has deferred maintenance needs such as a sign and deteriorating play equipment.*

Two objectives from that Plan are to

*1. Avoid construction of intrusive, out-of-scale structures in the neighborhood. While this neighborhood has a great diversity of styles of buildings, over-sized and overly tall structures are definitely out of place here. Such buildings are a threat to the general appearance of the neighborhood and to property values.*

*2. New parks and recreational facilities that are accessible, easily seen and safe for neighbors of all ages should be developed. Seek access to and development of water department green spaces on Washington Street for use as a neighborhood park.*

Our comments on the DEIS are based on these elements that show the long-term commitment we have to livability of our neighborhood.

When we started our involvement in this process a year ago, CRC staff was informing us that a park and ride lot on the Washington State Department of Transportation (WSDOT) property in the LNA would be on 17 acres with potential for 4,000 spaces. At a LNA meeting in August 2007, this proposal was not supported by about 73% of those polled in the 134 people in attendance. Reasons put forward were:

- Size, (Largest on West Coast)
- Traffic impacts on the Neighborhood,
- Safety impacts on five pre-school to high school facilities surrounding the park and ride site. (these include the school at the Presbyterian Church, Lincoln Elementary School, Discovery Middle School, Vancouver School of Arts and Academics, and Our Lady of Lourdes School.)
- Design criteria for such a large park and ride lot were not provided.

Since that time we have requested many times to have a discussion about the specific rationale that is being used to determine the need for park and ride lots and parking spaces required for the dedicated high capacity transit (HCT) to work. We have been provided with a range of parking space numbers from 900 to 2400 during the year. At no time have we been provided with the criteria used to select these numbers. The DEIS does not provide any discussion of the specific rationale or design criteria used to size the proposed park and ride lot options. In fact, in order to find even the proposed size of park and ride lots we have had to look at the Traffic and Transit Technical reports. This has made it very difficult for us to comment in any specific way on what the LNA would support or accept as mitigation for impacts on our neighborhood.

Our comments on park and ride lot sizing and what we would expect for mitigation are based on Exhibit 18, Full-Length and MOS Northern Terminus Option LRT Representative HCT Mode. We have used this exhibit to focus our concerns, but any HCT alternate selected during the process of developing a Locally Preferred Alternative and/or the Final Environmental Impact Statement (FEIS) should take into consideration these comments.

The number of park and ride spaces shown in Exhibit 18 range from 1250 to 3218 for the four HCT terminal alternatives presented. The Lincoln Park and Ride lot for Vancouver Full Length LRT alternative would be 1800. The Clark College LRT MOS would be 1100. Such a wide range of numbers implies an equally broad range of criteria for sizing the lots. CRC staff have told us that park and ride lot sizing depends on increasing the population density of an area to

levels that sustain the need for HCT. While this comment is not in the DEIS or technical reports it is the only criteria we have been provided with for this project.

Since there is no discussion of criteria for park and ride lots in the DEIS and related studies that we could find we have reviewed various state transportation department and local jurisdiction documents containing criteria for lot size and access considerations. Two of these are representative of the ones we have reviewed. They are the Massachusetts Design Manual Chapter 12 (MA) and the Park and Ride Selection and Design Criteria, Maricopa Association of Governments, Phoenix, Arizona (AZ). A few selections from these documents are attached at the end of our comments for better understanding of our position.

Our conclusions about the size of park and ride lots that would be acceptable to the LNA are as follows:

- Size of the CRC HCT park and ride lots should be limited to the standard size lot noted in MA and AZ documents of between 300 and 500 spaces.
- This size limitation is based on site access requirements that require entrances and exits at least 300 feet from any intersection (MA) to an absolute limit of 150 feet from other intersections (AZ).
- This size limitation is based on requirements that no parking space require a user to walk more than 300 feet to the bus or light rail station.
- This size limitation is based on our understanding that vehicular access to the Lincoln Park and Ride lot will only be on Main Street.
- This size limitation is based on our request that a portion of the WSDOT property at the Lincoln Park and Ride Lot will be used as a park.
- This size limitation is based on the comment on page 3-417 that construction close to the City of Vancouver well field could increase possible contamination of the City well field. A smaller park and ride lot would reduce this risk.

All of these conclusions are supported by the polling that we have done of the LNA members during the past year. A copy of an earlier letter and poll results that we have submitted is attached and should be included in the record of this DEIS.

While it may be true that the overall project will reduce air emissions from vehicles, we do not believe that will be the case at 39<sup>th</sup> and Main streets where queuing will be up to 1,100 feet and level of service will be F for up to 2 hours. (Exhibit 6-29 Traffic Technical Report) This is another consideration for having smaller park and ride lots.

We are concerned about the impact of having potentially two park and rides (the WSDOT property as a terminus and the Kiggins property as a satellite lot) and HCT on our neighborhood streets. While Main Street would be widened, causing the loss of businesses, traffic capacity on Main would be reduced. This will impede local traffic needing access to homes and services, including schools, and will lead to a dramatic increase of traffic on neighboring streets.

We are concerned that there are statements in the DEIS at several points that if a proposed alternative does not exceed impacts of the no action alternative then no mitigation for the impact well be considered. For instance, it is noted that Columbia Street should become an arterial street as a result of actions taken in the no action alternative. So any impact of the proposed

alternative would not be mitigated. We expect that no action means no action. Therefore changes to the designation of Columbia Street should be mitigated for as a result of this proposal.

We look forward during the next few years to working with the CRC and/or successor agencies in developing mitigation for this project.

Sincerely,

*Dave Howard*

Dave Howard Vice Chair Lincoln Neighborhood Association

Ken Becker, Transportation Committee Chair Lincoln Neighborhood Association

CC: Vancouver City Council

Dean Lookingbill

Jeff Hamm

#### Attachments

Sources used for Lincoln Neighborhood Association comments on Draft Environmental Impact Statement for Columbia River Crossing Project.

Source Massachusetts Highway Design Manual Chapter 12:

*Site Access/Egress: Separate driveway exits and entrances should be provided, preferably on different streets if possible. The entrance driveways should be on the upstream side of the traffic flow nearest the lot, and the exit driveway on the downstream side. There should be at least one exit and one entrance for every 500 parking spaces provided. All exits and entrances should be designed according to the criteria in Chapter 6 (At Grade Intersections). These criteria include capacity, corner sight distance, turning radii, and exclusive left- and right-turn lanes on the intersecting highway or street. An exit or entrance for a park-and-ride lot should desirably be at least 300 feet from any other intersection.*

Source: **Selection and Design Criteria** Maricopa Association of Governments Phoenix, Arizona

## Capacity

Park-and-Ride lot capacity is initially determined by analyzing the present and projected population, existing and projected transit rider ship and travel characteristics of the area to be served and the use of other park-and-ride lots in the area. Lots usually have 300 to 600 stalls, but exceptions in both directions are possible. Land availability can be a factor affecting the ultimate capacity of any given lot. As a rule of thumb, one acre can accommodate 90 to 100 autos in a park-and-ride configuration. Capacity should also be sited in response to customer needs or demands.

## Vehicle Parking

Park-and-Ride parking aisles should be perpendicular to the passenger waiting area. It is recommended that parking spaces be at 90-degree angles and served by two-way aisles no more than 400 feet long. Bus patrons would have a maximum walk of 300 feet. This parking layout allows vehicles to circulate in the parking area away from the passenger waiting area. Motorists would approach a parking space generally driving towards the waiting area, park, and then continue walking in that direction to the passenger waiting area. The reverse movement would occur for people leaving the buses. This circulation pattern minimizes conflicts between pedestrians and motorists.

## General Vehicle Access

Vehicles may access the parking area by at least one two-way driveway located away from the passenger waiting area. Vehicles can circulate within the lot away from the pedestrians, thereby minimizing conflicts between vehicles and pedestrians.

A sufficient number of entrances and exists should be provided so that the volume per lane does not exceed 250 vehicles per hour where sufficient street frontage exists. The number of entrances

and exists should match circulation requirements. Wherever a park-and-ride lot has more than 300 parking stalls, at least two exits should be provided.

## Access/Egress

The best alternative, which will both intercept automobile traffic and minimize interference to local traffic flow, will be evaluated at each site. Evaluation criteria should include consideration of traffic safety, minimization of traffic congestion, convenience for bus patrons, and impact on local land use.

Locating a facility on the right side for traffic inbound on a two-way arterial will allow most users to make a right turn into the lot, thus eliminating the hazard of crossing an opposing traffic stream. It is likely that maximizing the accessibility for the inbound trips will be more effective in attracting users than improving the flow for the exiting evening traffic.

Entrances and exits should be located, with regard to adjacent intersections, so that signal control of the exit could reasonably be installed at a later time if necessary. Storage for vehicles entering from the street and adequate queue storage for exiting vehicles should be planned.

Entrances and exits should be at least 150 feet apart and not closer than 150 feet to a public intersection, all measured curb to curb. However, 350 feet is desirable in both instances. Access spacing will be based on jurisdiction standards. Whenever a park-and-ride lot has more than 300 parking stalls, at least two entrance drives and two exit drives should be provided. As a guide, the volume per lane should not exceed 300 vehicles per hour. It is desirable for park-and-ride lots with capacities greater than 1,000 parking stalls to have entrance and exit points to two or more adjacent streets in order to allow for uncongested traffic dispersal. The intersection capacities of entrances and exits from the roadway system should be computed for all lots and an adequate level of service provided in the design.<sup>2</sup>

## Landscape

Landscaping for any park-and-ride facility serves a number of purposes. It not only adds to the aesthetic quality of the project, but it also serves to mitigate climatological factors. Landscaping can also help create the project's unique identity and serve to screen the project from adjacent uses. Landscaping should be designed in such a manner so that hiding places for persons engaged in criminal activity will be minimized. Use of low ground covers and trees with high canopies balance visibility, security, site design and buffering. Landscaping can provide an effective means for establishing pedestrian paths and walking patterns within the site.

1. Plant materials should complement the design and character of the surrounding community.
2. Native species, which are drought resistant and require low maintenance, should be used to the maximum extent possible.
3. Shade provided by trees allows opportunity for solar protection without a closed interior environment. Upon maturity, trees can lower temperatures in shaded areas at least 10 degrees.

4. Trees also provide climate enhancement in an arid region by shading pavement and reducing heat gain as well as the carbon content of the air.
5. Shade trees are an important landscape element due to the fact that they provide canopy protection without obstructing visibility.
6. Low shrubs and ground covers may be used in moderation as long as they do not obstruct visibility through the site.
7. Properly selected plant materials may require less maintenance than structures.
8. For trees located in an urban paved environment, the minimum exposed soil dimensions around the tree should be 10 feet by 10 feet. This is required to maintain a greater survival rate and ensure that trees reach full maturity.

b Lincoln Neighborhood Association

c/o 203 West 34th Street

Vancouver WA 98660

May 14, 2008

City Council & Columbia River Crossing Agency

Vancouver WA 98660

The Vancouver Lincoln Neighborhood Association has had numerous neighborhood meetings in the past year, focused on the CRC, with its representatives, and City of Vancouver Transportation Department staff, to help us understand the project and its potential impact on our neighborhood.

LNA has surveyed its residents for feedback on current options for the Columbia River Crossing and mass transit as an aid for the City Council to understand our position as a neighborhood. Attendees at our April meeting were surveyed in person, and subsequent input was requested through our newsletter, with the option of on-line or paper surveys. 159 respondents representing 152 households responded. The complete results are attached.

Most (65%) of the respondents prefer a replacement bridge. Most prefer LRT to BRT, but a small percentage oppose light rail under any circumstances. A large majority prefer a terminus outside of Lincoln neighborhood due to concerns for existing neighborhood disruption, traffic issues, and security concerns. If a Lincoln lot is used, most prefer a small footprint with a park. If HCT is routed through Uptown Village, most prefer it to be not entirely on Main. Overall, we prefer an alignment that preserves our neighborhood quality of life.

The surveying involved a great amount of work by volunteers, well aided by city staff. The similarity between results at the meeting and online/paper survey gives us confidence that these results are representative of the approximately 1500 households in our neighborhood. As a neighborhood, our primary desire would be to see that any changes that must occur only enhance its character and quality, rather than detract from it. We see the changes brought by a parking facility, mass transit, or significant realignment of our transportation systems as substantially changing the neighborhood character. We may individually differ as to our support or opposition to this project but as a neighborhood we want an active role in defining how it will occur and what mitigation is possible. We look forward to working together with you on making this happen and would appreciate a response soon as to how you see that occurring. Please consider carefully the impact on our neighborhood, and opinions of your constituents, when evaluating your options.

Lincoln Neighborhood Association

Jenny Brown, President

Lincoln Neighborhood Association May 2008 Transportation Survey Results		Meeting		Online		Paper		Combined	
<b>1) What should we do with the existing bridge?</b>									
a. Replace the I-5 Interstate bridge with a new bridge	67%	28	74%	53	50%	21	65%	102	
b. Add a new bridge for southbound; use the old ones for northbound	31%	13	22%	16	45%	19	31%	48	
c. Rebuild the existing bridges; do not add new capacity of any type	2%	1	4%	3	5%	2	4%	6	
	100%	42	100%	72	100%	42	100%	156	
<b>2) How often per week do you drive to Oregon?</b>									
a. Less than once per week	21%	9	24%	17	40%	17	27%	43	
b. 1-2 times per week	40%	17	19%	14	23%	10	26%	41	
c. 3-5 times per week	21%	9	21%	15	14%	6	19%	30	
d. 5 or more times per week	17%	7	36%	26	23%	10	27%	43	
	100%	42	100%	72	100%	43	100%	157	
<b>3) If done as well as the best example you can think of, could light rail connecting Vancouver to Portland be acceptable?</b>									
a. Yes	73%	30	93%	68	67%	30	81%	128	
b. No	27%	11	7%	5	33%	15	19%	31	
	100%	41	100%	73	100%	45	100%	159	
<b>4) What should we recommend for mass transit on the bridge only?</b>									
a. LR (light rail)	69%	27	78%	57	45%	19	67%	103	
b. BRT (bus rapid transit)	26%	10	21%	15	45%	19	29%	44	
c. No mass transit of any type	5%	2	0%	0	5%	2	3%	4	
d. No recommendation	0%	0	1%	1	5%	2	2%	3	
	100%	39	100%	73	100%	42	100%	154	
<b>5) End mass transit north of the bridge at this location:</b>									
a. Clark College area	33%	14	29%	21	34%	13	31%	48	
b. Kiggins Bowl area	7%	3	7%	5	0%	0	5%	8	
c. Park & Ride on WSDOT site (Lincoln: Main & 40 <sup>th</sup> area)	10%	4	12%	9	0%	0	8%	13	
d. Downtown somewhere	10%	4	5%	4	5%	2	7%	10	
e. Anywhere outside my neighborhood	2%	1	1%	1	13%	5	5%	7	
f. Continue it north beyond city limits	38%	16	45%	33	47%	18	44%	67	
	100%	42	100%	73	100%	38	100%	153	
<b>6) If parking is at WSDOT, we prefer:</b>									
a. A single surface level lot; the best blended landscaping we can develop	13%	5	13%	9	11%	4	12%	18	
b. A multi-level lot using less land; more green space, preferably a park	26%	10	61%	43	49%	17	48%	70	
c. Size matters; as small as possible, regardless of configuration	62%	24	27%	19	40%	14	39%	57	
	100%	39	100%	71	100%	35	100%	145	
<b>7) What is my greatest concern with parking at WSDOT site?</b>									
a. Security; increased crime	15%	6	33%	24	21%	6	26%	36	
b. Safety; traffic and pedestrian	10%	4	5%	4	4%	1	6%	9	
c. Traffic and pedestrian volume	26%	10	19%	14	18%	5	21%	29	
d. Disruption of existing neighborhood	36%	14	23%	17	29%	8	28%	39	
e. Multiple egress roads to facility	5%	2	19%	14	29%	8	17%	24	
f. Other	8%	3	0%	0	0%	0	2%	3	
	100%	39	100%	73	100%	28	100%	140	
<b>8) If HCT is to continue north to Fourth Plain or beyond, should it:</b>									
a. Have both directions of traffic on Main	8%	3	13%	9	11%	4	11%	16	
b. Have both directions of traffic on Broadway	59%	22	39%	27	36%	13	43%	62	
c. Have one direction of traffic on Main and one on Broadway	32%	12	49%	34	53%	19	45%	65	
	100%	37	100%	70	100%	36	100%	143	
<b>9) Should we even have a neighborhood position on this subject?</b>									
a. Yes, made by those who participated in the process	93%	38	89%	63	98%	43	92%	144	
b. No	7%	3	11%	8	2%	1	8%	12	
	100%	41	100%	71	100%	44	100%	156	

Note: If more than one answer was checked and no preference was indicated, the answer was not counted.