From:	Williams, Kathryn
To:	Gundersen, Heather;
CC:	Draft EIS Feedback;
Subject:	Port of Portland CRC DEIS Comments
Date:	Tuesday, July 01, 2008 3:01:43 PM
Attachments:	CRC_DEIS_PortofPortland_comments.pdf

<<CRC_DEIS_PortofPortland_comments.pdf>>

Heather,
I've attached the Port of Portland's CRC DEIS comments, for your review. A hard copy will follow in the mail.
Please feel free to contact me with questions or concerns.
Kind regards,
Kathryn

Kathryn Williams
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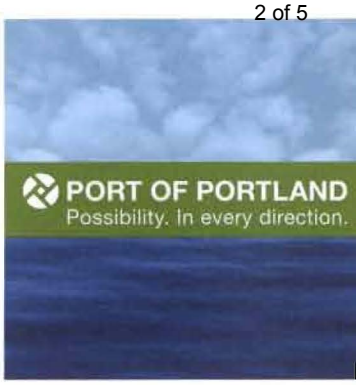

July 1, 2008

Heather Gunderson
CRC Environmental Manager
Columbia River Crossing Project
700 Washington Street, Suite 300
Vancouver, WA 98660

RE: Comments on Draft Environmental Impact Statement

Dear Ms. Gunderson:

The convergence of surface transportation and port facilities in Portland and Vancouver make the Interstate 5 (I-5) corridor, between the Interstate 84 interchange in Oregon and the Interstate 205 (I-205) interchange in Washington, the crossroads for freight flows by all modes into, through and around this region. Our geographic good fortune and wise past transportation investments have created a system that is the foundation for this region's economic activity. The Portland/Vancouver region is an established distribution area and we reap the benefits of a market area larger than our jurisdictional boundaries and population base due largely to the transportation network serving it. Our ability to serve that broader market is directly dependent on the ability of the transportation system to support business needs by moving products to market, particularly in the I-5 corridor.

I-5 carries the highest volumes of freight in the States of Oregon and Washington and it is the key route for freight originating or destined for Portland or Seattle. Within the study area, I-5 is the most congested segment of the regional freeway system and is one of the most significant bottlenecks on the interstate serving the West Coast. Both the future development of this region's job base and the viability of rail, marine, truck and air modes are impacted by the congestion in this corridor.

For this reason, we appreciate the opportunity to make formal comments on the Columbia River Crossing (CRC) Draft Environmental Impact Statement (DEIS). We have participated in both the CRC Task Force and the Freight Working Group. Both forums provided the opportunity to ensure that this critical infrastructure project will help to support the Port's mission to enhance the region's economy and quality of life by providing efficient cargo and air passenger access to national and global markets.

The Port supports a new replacement crossing with light rail transit (alternative 3). We also support improvements to the seven interchanges within the study area, including an improved interchange at Marine Drive to meet the intermodal access needs of our marine terminals and businesses in the Rivergate Industrial Park. We support the use of tolls to finance the project and manage traffic demand.

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Marine Drive Interchange

We have participated in the CRC Freight Working Group (FWG) over the past several years and appreciate both CRC staff and FWG members' thorough attention to the interchange design process. CRC staff has helped this group evaluate traffic flow associated with grade changes, lane and shoulder widths and turning radii to ensure that truck access and mobility is maximized in the design.

The Marine Drive interchange is the most critical freight interchange within the State of Oregon. It provides direct access from the interstate to the State's only intermodal container terminal – Terminal 6 – and the freight logistics center in Rivergate. Terminal 6 is currently operating at one quarter of its full capacity and with projected new lease arrangements, will increase its traffic substantially over time. Any redesign of this interchange must ensure that freight mobility is the design priority. Of the three interchange design options presented within the DEIS, the first alternative or "standard design," which retains most of the exiting Marine Drive alignment west of the interchange, best accommodates current and future freight movements. The "standard design" allows free-flow movement for the highest traffic flows and minimizes and/or eliminates stops to enhance truck mobility. This design also minimizes the need for new right-of-way acquisition, helping to control costs.

Recognizing that final design of the Marine Drive interchange will occur in the coming months, we have several concerns related to the two alternative designs ("southern realignment" and "diagonal realignment") outlined within the DEIS and others that continue to be discussed. These designs push the interchange connection to Marine Drive to the south, running adjacent to the Expo Center and the Vanport wetlands, connecting to the existing Marine Drive at Force Avenue. In yet another alternative, portions of the Expo Center and portions of the industrial land just west of Force Avenue would be acquired to allow for a smoother curve.

We are concerned that these alternate designs will pave the way for zone changes that would allow for non-industrial uses to take away capacity originally provided for freight mobility. Several of these alternate designs have the potential to open up the industrial waterfront to residential and commercial development. This concern was voiced during the I-5 Trade and Transportation Partnership and is referenced in Section VI B1 i (1-4), Final Strategic Plan for the Corridor June 2002, which recommended managing growth to ensure that the expected life span of the I-5 investments are not shortened and scarce industrial land is not converted to commercial uses.

Finally, the Vanport wetlands developed by the Port as mitigation lie southwest of the interchange and may be impacted by the "southern realignment." The extent of the impact is unknown but significant additional mitigation will be required to address them.

West Hayden Island

Recognizing the need for Portland's marine facilities to meet forecasted trade growth, the Port Commission in 1993 directed Port management to acquire West Hayden Island (WHI). The transaction was completed in 1994. The 825-acre site is adjacent to the Columbia

River navigation channel, in close proximity to the main lines of both the Union Pacific and Burlington Northern Santa Fe (BNSF) railroads and the interstate highway system, making it ideal for deep-draft marine cargo facilities.

The Port has retained the property in marine strategic reserve status. The timing of the Columbia River Crossing project and the East Hayden Island Plan helped trigger the Port's request that the City of Portland undertake a process leading to annexation of WHI for a combination of industrial sanctuary and open space uses.

Consistent with the approach that CRC has taken with East Hayden Island, as well as the proximity to of WHI to the CRC study area, the same consideration must be given to the potential WHI development and associated infrastructure improvements. These improvements include an arterial connection between WHI and Marine Drive, as well as associated rail access improvements. Integrating these two efforts provides a unique opportunity to address how WHI traffic will be served and if an additional access to the Island will be coordinated with the overall CRC planning effort. Preliminary traffic modeling suggests that a new arterial connection would serve both new WHI development as well as broader Hayden Island traffic in order to make transportation and economic sense.

The Port recommends that the future development of West Hayden Island, including an arterial bridge connection and associated rail improvements, be reflected in the cumulative effects chapter as reasonably foreseeable future projects.

Marine Navigation

Within the I-5 Trade Corridor, I-5 intersects with the Columbia River, connecting the Interstate system with deep water shipping, upriver barging and two water-grade transcontinental rail lines. The current I-5 bridge, both due to the clearance issues and the proximity to the BNSF rail bridge located less than a mile downstream, is considered to be one of the most dangerous navigational hazards on the Columbia River. The Port supports a replacement bridge design high enough to eliminate the need for bridge lifts. In addition, the replacement bridge design should provide better alignment with the primary shipping channel and the BNSF rail bridge swing span. To the extent possible, the replacement bridge should also provide a wider pier design to accommodate more modern marine vessels.

Number of Lanes

One of the six problems the CRC project seeks to fix is the safety and vulnerability to incidents within the study area. Close interchange spacing, short off and on ramps, vertical grade changes and narrow lanes and shoulders are examples of the many highway design features that do not meet current standards and contribute to the high number of incidents that impact the flow on this stretch of the interstate. We recommend that the project be sized to include three through lanes and up to three auxiliary lanes for merging and weaving to address existing safety and future traffic growth in the corridor.

Tolls

We appreciate the work the CRC project team has done on the potential impacts of implementing a toll on the I-5 crossing and the related impacts on parallel facilities. We are currently working with the Oregon Department of Transportation Region 1 staff to develop a design for the Airport Way/I-205 North Bound ramp, an assumed project in the Cascade Station EIS, which is planned for construction by 2014. Due to the inter-relationship of I-205 with I-5 and the potential diversion, we will want to coordinate our traffic design assumptions for that project with the CRC final traffic design assumptions and we request that the Departments of Transportation for the States of Oregon and Washington continue to monitor impacts to parallel facilities, like I-205, particularly in a scenario where I-5 is tolled and I-205 is not.

Thank you for your consideration of these concerns.

Sincerely,

Bill Wyatt
Executive Director