

1661 N. Jantzen Ave.
Portland, OR 97217

June 30, 2008



Columbia River Crossing (CRC)
Attn: Heather Gundersen
700 Washington Street, Suite 300
Vancouver, WA 98660

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Columbia River Crossing

Re: Comments on CRC DEIS

The purpose of this letter is to express support for Alternative 3 with LRT adjacent to I-5 and provide comments on the DEIS.

In general, I want to voice my concurrence and support of the comments to the CRC on the DEIS from Hayden Island Neighborhood Network [HINooN] and Jantzen Beach Moorage Inc. [JBMI]. These two letters express concerns and comments that I share.

In addition to the comments reflected in the above referenced letters I have the following comments on the DEIS.

Bridge Type: I do not support an 'iconic' bridge. The Pacific Northwest provides natural visual aesthetics that far surpass any that man may impose. The new bridge structures should be efficient and elegant, and impose minimal visual impact of their own.

Hayden Island Impacts: The CRC DEIS does not accurately reflect impacts to Oregon housing resulting from displacement of floating homes. The CRC DEIS does not appear to include all applicable U.S. Bureau of Census data for Hayden Island, resulting in two-thirds of the island's population not being included in the poverty, race or any other demographic characterization, and misrepresentation of median home values. The entire demographic profile of Hayden Island needs to be re-done using the appropriate data.

Economic Technical Report: The sections on Marine Commerce imply that water commerce is currently hindered by the existing bridge structure. The 604 bridge lifts in 2004 included recreational boats as well as commercial vessels. The number needs to be compared to total commercial transits to be informative. The net benefit from the CRC project appears overstated.

- Section 5.6: Economic Perspective of Marine commerce on the Columbia River is cited but not included in the report.
- Throughout the report, the reference to Hayden Island Master Plan should be changed to Hayden Island Neighborhood Plan for accuracy and consistency.

Navigation Technical Report. The Navigation Technical Report does not reflect a thorough understanding of navigation through the API. The Navigation Technical Report should provide a basis for evaluating various potential replacement bridge heights and their impacts to navigation. The CRC report appears to assume a main span bridge elevation of approximately 95' [page 4-5] but contains no evaluation of why this vertical clearance was selected. Arriving at a suggested design clearance should have been the objective of the Navigation Technical Report; it should not have been an assumption.

Bridge height affects numerous project-related impacts including, but not limited to, energy consumption, airspace, cost, and aesthetics. The lack of a rigorous vertical clearance requirement assessment results in incomplete evaluation of all these project elements.

Columbia River Crossing

Page 2

In addition to the above general comments, the conclusions regarding impacts to navigation in North Portland Harbor are seriously flawed.

The following specific comments regarding the Navigation Technical Report are representative of the types of concerns identified by this commenter.

Specific Comments:

- References to all vertical clearance dimensions need to reference a datum.
- Pg 1-6 Section 1.3.2: References that the replacement bridge alternative will increase safety but there is no information provided regarding existing accident or collision rates in this reach that quantifies an existing problem. The reader cannot gauge the value to navigation from any improvements.
- Section 1.3.4: The North Portland Harbor appears to be confused with the deep draft Columbia River navigation channel on this page and throughout the Technical Report. The federally authorized navigation channel that currently passes under the I-5 and BNSF RR bridges mainstem bridges is the Columbia River between Vancouver-The Dalles project, not the North Portland Harbor [Oregon Slough] project.
- Pg. 2-1, Section 2.2: NOAA Navigation Charts showing the authorized channels should replace the aerial graphic in this section. The graphic should clearly show the delineation of "eastern portions" and "western portions" as referenced in Section 4 of the Technical Report and to which the reader currently has no reference. Correct last line '*North Portland Harbor, also known as North Portland Harbor.*'
- pg 2-3 Section 2.4 A 2006 Boat Survey Technical Memorandum is referenced. Is this the same document as the Boat Survey [Parsons Brinckerhoff, 2004]? Paragraph 2 in Section 2.4 states that the data in the 2006 Boat Survey Technical Memorandum was updated in 2006. There appears to be an error in references in this paragraph.
- Pg 4-1, Section 4.2.1: The reader is given no idea of what is meant by '*eastern portion*' or the '*western portion.*' East and west of what? The Port of Portland facilities referenced in this paragraph [assumed to be Terminal 6] are located on the deep draft federally authorized Columbia River navigation channel, not on the federally authorized shallow draft channel called Oregon Slough or North Portland Harbor. Port of Portland facilities are outside the project's API and have little relevance to navigation in this reach. North Portland Harbor west of the N. Portland Harbor Bridge contains the largest floating home moorage in Oregon [on Hayden Island's south shore] and major marine industrial facilities [Diversified Marine (DM) and Ross Island Sand & Gravel (RISG)]. Both DM and RIS&G require daily vessel trips through this reach for their operations. The reach is also heavily used by recreational boats.
- 4.2.1.1: 2nd paragraph, 1st line: Previous studies have characterized navigation in this reach. The sentence should be changed to read: '*Previous studies performed by the CRC project have not.....*'.
- Exhibit 4-4. Remove reference to North Portland Harbor. It is not applicable to the statistics shown.
- Pg. 45, Exhibit 4.6: This table appears to summarize transits of a specific class of vessels using the reach, or those vessels requiring high vertical clearances. It does not summarize all vessels through the reach. The narrative and exhibits need to be corrected to accurately state what Exhibit 4-6 demonstrates.
- Pg 5.2, Section 5.2.2.1: The 2nd paragraph grossly misstates the impact of new bridge structures in North Portland Harbor. The paragraph reads:

Columbia River Crossing

Page 3

The proposed North Portland Harbor navigation vertical clearance envelope will meet or exceed the existing clearance envelope. There are no apparent adverse long-term effects to vertical clearance.

Currently vessels traveling between the BNSF N. Portland Harbor RR Bridge and the N. Portland I-5 Bridge are *unrestricted* regarding vertical clearance. The BNSF has a swing span that allows transits of vessels exceeding the bridge's 35' CRD clearance. Therefore, the single impediment to vessels is the existing N. Portland Harbor I-5 Bridge. The construction of new bridges within this reach will add several vertical clearance restrictions not currently experienced by commercial or recreational vessels. The conclusions and impacts in this section of the Navigation Technical Report, and repeated in Sections 6.2.1.1, 8.2.1.1 and elsewhere, are erroneous and need to be corrected.

As a private citizen living within the API, I do not claim to have reviewed the entire DEIS and all its Appendices and Technical Reports. I have reviewed portions of the DEIS most relevant to my situation. Based on my limited review, I have deep concerns about the overall accuracy of the entire DEIS. I urge the CRC and stakeholder agencies to perform a comprehensive technical review of the conclusions and impacts stated within the DEIS before making further decisions regarding alternatives.

Very truly yours,



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