


**From:** [Daniel Swink](#)  
**To:** [Draft EIS Feedback;](#)   
**CC:**  
**Subject:** I-5 DEIS Comments  
**Date:** Tuesday, July 01, 2008 9:10:46 PM  
**Attachments:** [2008-6-30 I-5 CRC DEIS Comments.doc](#)

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Attn: Heather Gundersen,

Please see the attached word document that has my comments for the I-5 Columbia River Crossing DEIS.

I have also sent this by fax today, but I am not sure if I can still get a postal letter postmarked with today's date.

Please verify for me that my comments have been entered into the DIES record and will be responded to.

Thank you very much,

Daniel Swink  
360-852-6688

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Columbia River Crossing Project  
C/O Heather Gundersen, Environmental Manager  
700 Washington Street, Suite 300  
Vancouver, WA 98660

RE: I-5 CRC DEIS Comments

I am a resident of the Rosemere neighborhood in Vancouver Washington that has been commuting to Portland to work for the majority of the last 18 years. I will also mention that I have experienced living with and commuting with (among other Washington highway and bridge projects); the entire construction of Interstate I-90 (from 24 miles plus east of and to Seattle), and the entire construction of the West Seattle Bridge.

I have the following comments regarding the Draft Environmental Impact Statement (DEIS) for the I-5 Columbia River Crossing Project:

1) Public Comment Period

a. The allotted time period for public comment is woefully inadequate for the public to; receive the DEIS, review its contents and the supplemental list of DEIS Errata and Clarifications, and then give informed feedback. This project is a major undertaking and requires careful review. The 6,105 plus pages of the DEIS has been years in the making and to expect the public and other interested parties to turn around and give good feedback in only two months is absurd.

b. Having the final Columbia River Crossing (CRC) Task Force Meeting reviewing summaries of public comment and advancing project along before finishing the public comment period is premature and irresponsible and alienates the public.

2) Financial Analysis

a. Funding for this project is in serious question. Determining how, what, where, and when parts of the project could be affordably done in phases at this time should be carefully and thoroughly looked into before advancing the project. This approach could provide provisions to expand the project as funding allows, thereby reducing strains on taxpayers and the funding of other needed projects.

b. Seattle's Light Rail Transit (LRT) project went five billion dollars over the voter approved budget for only the first portion of the project and the project is years behind schedule, and Portland's West Side LRT "MAX" line project was estimated to cost \$395 million and ended up costing \$963 million. What measures and guarantees are in place to prevent similar cost overruns and set-backs from burdening the tax or toll payers and jeopardizing the completion or future phase expansion of this project?

c. Recent project testimony by experienced and informed transportation and government officials have made it known that the commuters and taxpayers of Clark County would probably end up having to pay for more than a third of the overall project cost. How can the project insure that Clark County doesn't get burdened with paying more than its fair share of the project that primarily serves the economy of the entire west coast?

d. Since it is not currently known how the majority of the project will be funded, how can the scale of this project insure that all the necessary and unforeseen mitigation expenditures will not get left out of the project allocations or finished construction?

### 3) Description of Alternatives

a. What measures will be taken to offset the income tax being paid to the State of Oregon and other transportation expenses incurred by Washington commuters traveling to Oregon for jobs that would be heavily burdened with the new crossing tolls?

b. I **DO NOT** support extending Light Rail Transit into Clark County as part of this project. Any High Capacity Transit (HCT) that is incorporated into Vancouver can have serious impacts on how desirable the preferred livability of the city is and its economic viability, and should be voted on by the public. If HCT is to be a part of this project, then I would support Bus Rapid Transit (BRT) as the current option to be used.

c. LRT projects have a history of cost overruns that burden taxpayers and require additional subsidies to construct, operate and maintain. In Seattle, cost overruns and delays of LRT have turned the project into a taxpayer's nightmare and forced utilizing the more reliable bus system while more money is sought from taxpayers to complete the unfinished portions of the LRT project. It also appears that Oregon's interest in pursuing LRT to Vancouver would be to take advantage of further extending the funding and subsidy base to support their system that is not cost effective.

d. There is not the density of population base in Clark County to support using LRT and make it cost effective. The majority of Clark County's population is closer to the I-205 corridor than it is to the I-5 corridor. It does not make sense to expect people from the east side to come to the I-5 crossing just to use High Capacity Transit.

e. A 2003 testimony titled "FEDERAL TRANSIT ADMINISTRATION, Bus Rapid Transit Offers Communities a Flexible Mass Transit Option" (GAO-03-729T) was given by the United States General Accounting Office (GAO) and Federal Transit Administration (FTA) to the U.S. Senate committee on Banking, Housing, and Urban Affairs. This testimony states that: "Buses form the backbone of the nation's mass transit systems. About 58 percent of all mass transit users take the bus, and even in many cities with extensive rail systems, more people ride the bus than take the train." The testimony also says that "FTA promotes the Bus Rapid Transit concept with the slogan "think rail, use buses."

f. The infrastructure and operation associated with LRT use make it more dangerous and awkward for pedestrians, bicyclists, vehicles and other forms of traffic to interface with.

g. A 2001 report titled "MASS TRANSIT, Bus Rapid Transit Shows Promise" (GAO-01-984) was given by the GAO to Congressional Requesters. This report examined 20 existing BRT lines and 18 existing LRT lines. In this report, the end of the review of System Performance states; "We also found that, in most instances, Bus Rapid Transit was faster than Light Rail in the six cities in our study." The comparison chart in the report shows that BRT was significantly faster.

h. The 2001 GAO report (GAO-01-984) found that Capital Cost per Mile for BRT could be built for a fraction of the cost of LRT.

i. The 2001 GAO report (GAO-01-984) shows that Operating Cost per Vehicle Revenue Hour is blatantly lower in five out of six cities studied.

- j. The 2001 GAO report (GAO-01-984) shows that Operating Cost per Vehicle Revenue Mile for BRT was at a fraction of the cost of LRT for all six cities studied.
- k. The 2001 GAO report (GAO-01-984) shows that Operating Cost per Passenger Trip for BRT was lower than LRT for four out of six cities studied.
- l. Maintenance costs would also favor BRT over LRT.
- m. In constructing BRT, it would not be necessary to include all the final elements before beginning operations; it is possible to phase in improvements over time. Thereby keeping up front costs lower and putting it into operation sooner. In contrast, LRT must be fully completed and tested before starting operation and realizing benefits.
- n. BRT systems have the advantage of being more flexible than LRT and can respond to changes in employment, land use, and community patterns by increasing or decreasing capacity or adjusting routes over time. LRT is fixed and can not easily change to adjust to new patterns of housing and employment or other influences.
- o. BRT has the ability to operate both on and off a busway or bus lane providing the flexibility to respond to operating problems. In contrast, LRT can become inoperable from a variety of consequences such as; railway obstructions, rail maintenance or repair, weather interference, and electrical failure or power supply outages.
- p. BRT lanes could easily provide emergency vehicle access or be used for future alternate uses. LRT track obstruction does not offer this.
- q. The Port's Freight Route Delay Analysis regarding signal priority for LRT, shows that the LRT delays to traffic will create livability and economic issues by stopping traffic flow on any of the arterials and streets that LRT crosses. These crossing interruptions would not only have a negative economic impact in impeding freight and traffic flow, but would bring greater noise, congestion and pollution, and would require additional mitigation measures to be put in place.
- r. All the overhead electrical structure and institutional control such as fencing and signage that LRT requires would create more clutter of distractions and undesirable eye pollution as well as obscure scenic views and add unwanted bird perches (such as the bird problem on the existing I-5 bridge) that would detract from the quality of life experience in the affected area and commute.
- s. Using BRT would also eliminate the EMF emissions exposure associated with LRT.
- t. I would prefer a new bridge that takes advantage of the scenic view and eliminates or minimizes the chronic problem of overhead bird perching issues, if it can be built without over burdening the taxpayers and commuters of Clark County, and without jeopardizing funding for other needed local projects.

- u. I have serious concerns about the seismic safety that can be achieved with both the existing bridges and the proposed bridge design replacements. I have heard testimony that there are other bridge designs that would offer better seismic safety than the rigid concrete bridge being proposed. Were other bridge designs eliminated because of having to accommodate the Pearson Airport air space, and are other designs still being considered to alleviate potential seismic damage or structural failure?
- v. Surfaces of the bridge, highway and the HCT should be designed to capture; storm water, vehicle fluids and accident spills, and treat them in an environmentally sound way to prevent polluting of river water bodies or ground water.
- w. The DEIS should more specifically address at all phases of the construction process how it will prevent the spread of existing ground or river water contamination, and how it prevent contributing more contaminants to ground or river water.
- w. Bridge lighting should be designed to minimize scenic view obstruction and not create excessive light pollution and glare.
- x. The bridge crossing design should allow for pedestrian and bicycle access at Hayden Island and preferably allow for both a far west side and far east side of bridge exposure to the surrounding view.
- y. Regarding a HCT terminus location, I think given the overall cost of the crossing project and lack of funding, that the terminus should be located to minimize both cost and impacts.
- z. Regarding a HCT terminus at Clark College, I have strong concerns that this will have serious impacts to the east side of interchange I-5 and Fourth Plain Blvd. It would create more congestion and traffic hazards on Fourth Plain Blvd and increase cut-through or by-pass traffic in the Rosemere neighborhood.
- aa. Will there be **adequate** future opportunity for the public be involved and give input on the project changes that occur from the DEIS before the Final Environmental Impact Statement is Approved?
- bb. In the DVD format of the DEIS, the Noise Appendix E file objects are not viewable. Is this intentional?

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