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July 1, 2007

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Hand Delivered
Columbia River Crossing

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



RE: Columbia Waterfront (Gramor Development, Inc.) Vancouver Project Comments on CRC Draft Environmental Impact Statement

Dear Columbia River Crossing Sponsors and Staff:

Thank you for the opportunity to review and comment on the Columbia River Crossing (CRC) Draft Environmental Impact Statement (DEIS), dated May 2, 2008. Gramor Development, Inc. has recently purchased and leased and is in the process of developing approximately 33.11 acres of waterfront located immediately north of the Columbia River in Vancouver, Washington (the site is composed of three tax parcels: 49355-000, 23.58 acres and 502180-000, 4.60 acres both owned by the Columbia Waterfront LLC, and 48843-000, 4.93 acres owned by the Port of Vancouver and leased by the Columbia Waterfront LLC). The site is immediately west of the proposed CRC bridge. The site is bounded to the north by the Burlington Northern Santa Fe (BNSF) rail line and to the south by 1900' of Columbia River shoreline. To the west, it abuts the neighboring Lafarge industrial property and to the east the parking lot closest to the Columbia Executive building.

The City of Vancouver (City) began working on the Vancouver City Center Vision (VCCV) Plan in 2004 and adopted the plan in June, 2007. The Plan calls for dense mixed-use urban development on the Columbia Waterfront site with public access to the waterfront and trail connections along the site and the existing trail to the east. Specifically, the plan requires development of approximately 3,000 residential units, 450,000 square feet of office space, 125,000 square feet of retail space, 200 hotel rooms, 10,000 square feet of institutional space, and 100,000 square feet of light industrial space.

Gramor Development Inc. has been working with the City to plan development of the waterfront site for approximately two years and has recently completed a series of public meetings with Vancouver community and business groups to review a draft conceptual plan. Gramor Development, Inc. will be submitting for City approvals beginning in the summer of 2008 with completion of permits during spring/summer of 2009 and the intent to break ground in 2010. The proposed Columbia Waterfront project is consistent with and an essential component of the adopted City Comprehensive and VCCV Plans.

Gramor Development, Inc. supports the CRC project and recognizes that it will provide much-needed improvements to vehicle and transit access which will significantly improve access to the region. Our comments below are based on the information available in the DEIS and we request that any future information related to or affecting the Columbia Waterfront property

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(such as specific design details and mitigation) be addressed in writing to Gramor Development Inc.'s head office at the address below via registered mail thirty (30) days prior to any final decision making.

Mailing Address:

Gramor Development, Inc.
 19767 SW 72nd Avenue
 Suite 100
 Tualatin, OR 97062-8352
 Telephone: (503) 245 1976

Comments/Questions

The following information outlines our comments and questions related to probable significant adverse environmental impacts and mitigation measures addressed in the DEIS. We have focused specifically on areas where we believe additional information and analysis are required in the Final Environmental Impact Statement (FEIS) for impacts to be fully identified and mitigated. We have summarized our comments about probable significant environmental impacts and they are followed by questions. We would appreciate your considered response to each general DEIS comment and questions.

1-00 CRC Project Schedule/General Comments:

The Columbia Waterfront project has been planned and will be permitted during 2008/2009. The CRC project has the potential to impact this project significantly. In the FEIS for the CRC project please address impacts and mitigation of the timing of the CRC construction process on the Columbia Waterfront project.

- 1-01 Could you please advise as to the latest project schedule (in circulation as of July 1, 2008) and thereafter agree to update Gramor Development, Inc. via registered mail within (48) hours of each and every subsequent plan change commencing July 1, 2008?
- 1-02 The CRC bridge schedule appears to be running parallel to Gramor Development, Inc.'s waterfront project, considering both projects what plans does CRC have to ensure site accessibility for both projects?
- 1-03 Considering CRC / Gramor Development, Inc. projects running parallel, what concerns does CRC have as to the supply of manpower, equipment and materials and plans to alleviate potential shortfalls in any discipline?
- 1-04 What plans does CRC have for providing an effective interface between the bridge crossing project and Gramor Development, Inc.'s Columbia Waterfront project?

2-00 CRC Staging Area(s):

The Columbia Waterfront project is currently being planned for consistent with the adopted VCCV Plan and permitting will begin prior to completion of the CRC FEIS. The Columbia Waterfront project is located immediately west of potential construction staging for the CRC project. Impacts and potential mitigation of construction staging on

the Columbia Waterfront property are not fully addressed in the DEIS and should be further analyzed in the FEIS. Probable significant environmental impacts include: effects on the land uses proposed for the site, development phasing of the Columbia Waterfront project, construction transportation and equipment access, air and noise pollution, and impacts to the shoreline and critical areas of the Columbia River to the west of the CRC project area.

- 2-01 On the Washington State side please identify site the primary construction staging area?
- 2-02 How much space will the primary staging area consume?
- 2-03 Are there other construction staging areas, and if so how large are they and what is their location in proximity to the primary staging area?
- 2-04 Where are the planned entry and exit points for the primary and other construction staging area(s)?
- 2-05 Do the planned construction staging areas include access from the river?
- 2-06 Can you provide layouts of the planned construction staging areas?
- 2-07 What are the projected impacts of CRC construction staging effect on surrounding properties?
- 2-08 Specifically related to Gramor Development, Inc.'s Columbia Waterfront proposed development, and what are the impacts of CRC construction staging areas on this site, including the 1900 feet of shoreline?
- 2-09 Acquisitions Technical Report reads "...one hotel, one office/professional services building..." Can you confirm identity of these buildings as Red Lion Hotel at the Quay and Columbia Executive Building?
- 2-10 Acquisition Technical Report reads: "...if the pre-casting construction technique is used, desirable site characteristics are likely to include:
- A large (at least 15 acres) open site suitable for heavy machinery and casting of bridge segments,
 - Waterfront property with access for barges to convey material to the construction zone, and..."
 - Are we correct in assuming that the aforesaid (15) acres includes the area currently occupied by Red Lion Hotel at the Quay and Columbia Shores Executive Building?
- 2-11 Does the primary staging area require any additional land west of I-5 Bridge (Washington side) beyond the Red Lion and Columbia Shores Executive Building and if so to what extent?

3-00 Energy/Utility Requirements:

The Columbia Waterfront project will be a significant extension of downtown Vancouver consistent with City plans and will result in a multi-year, phased development. It is essential that utility access is retained during and after construction. The DEIS does not address impacts to or mitigation for the utilities required for construction of the Columbia Waterfront project which will be constructed concurrently with CRC. Please further address impacts and mitigation measures in the FEIS.

3-01 Can you inform us of any planned utility hook-ups for construction staging areas and show supply points on an accompanying map or plan?

3-02 What steps has/will CRC take to ensure availability of a sufficient amount of utility supplies, for the duration of construction, based on potential of CRC/Gramor Development, Inc.'s projects proceeding/peaking in tandem?

4-00 Columbia Waterfront Property Access:

The Columbia Waterfront property is bounded to the north by the existing Burlington Northern/Santa Fe Railroad berm. The Columbia Waterfront project is being carefully designed and phased consistent with the Port of Vancouver, City, and BNSF improvements to the railroad and underpasses at Esther and Grant Streets. On-going access to the site by Columbia Way is critical. The DEIS does not indicate whether access to Columbia Way will be restricted during construction of the CRC project. Any restriction to Columbia Way access during construction of the CRC project would result in a significant adverse environmental impact to construction and land uses at the Columbia Waterfront property and should be analyzed in the FEIS. In the FEIS, please also address the impacts of CRC construction staging on vehicle and emergency vehicle access to the Columbia Waterfront property.

4-01 Can CRC provide confirmation that unhindered access to Columbia Street and the Columbia River Waterfront redevelopment area is assured open for duration of CRC project?

4-02 What measures can CRC put in place to ensure 24/7/365 access for emergency services, construction personnel and vehicles of all descriptions to Gramor Development, Inc.'s waterfront site?

4-03 Can CRC guarantee Gramor Development, Inc. unhindered access to the full 1900 feet of shoreline on the Columbia Waterfront site?

4-04 Can CRC guarantee that existing City-owned marina and associated dock and moorings will remain accessible to Gramor Development, Inc. for 24/7/365 operation for the duration of CRC's bridge project?

4-05 Does CRC know of any impediment to Gramor Development, Inc.'s potential use of Columbia River on/off loading (e.g., barge traffic) during CRC's project duration?

5-00 Transit Alignment:

The Columbia Waterfront project will provide dense mixed-use residential and commercial development. Residents, employees and visitors will require access to transit facilities. The DEIS provides analysis of transit alternatives including a transit stop at 7th Street and several potential termini. The FEIS should include further analysis of the preferred alternative transit stops, termini and impacts on surrounding land uses including the Columbia Waterfront project, and the connectivity of LRT with a local bus or streetcar system (tie in points, likely routing, etc.).

- 5-01 Alternative 3 includes light rail which we believe will provide the appropriate form of public transit to downtown Vancouver.
- 5-02 Gramor supports light rail transit alignment and we advocate the smallest footprint and cross section possible, can you confirm the light rail choice and advise details of footprint and cross section?
- 5-03 Appropriate transit stops should be located in downtown Vancouver. Transit stop placement is essential to serve existing and proposed development, can you confirm that the first stop in downtown Vancouver will be as shown on 7th Street?
- 5-04 As to the proposed Kiggins Bowl transit terminus, this site is considered essential in enabling as many people as possible to have transit means to the Gramor Development, Inc. waterfront development. Can CRC confirm Kiggins Bowl site as the chosen transit terminus?
- 5-05 Can CRC confirm that transit alignments/stops will be designed to allow for future integration with a secondary downtown transit system such as a streetcar?
- 5-06 As to the provision of an Aerial Guide Way Easement, as a neighboring property owner our request is for CRC to supply information and related plans for such an easement.

6-00 Acquisitions/Easements and Airspace Rights:

The DEIS does not clearly identify the extent and exact location of property required for acquisition, easement or air rights for the CRC project in the vicinity of the Columbia Waterfront property. Requirements for acquisition or easements of any portion of the Columbia Waterfront property would be significant since the site has been planned for and will be permitted for dense mixed use development which is consistent with and required by the City of Vancouver Comprehensive and Vancouver City Center Vision Plans. Please address the impact of acquisitions and easements and airspace rights on surrounding land uses in the FEIS.

- 6-01 Extract from CRC Technical Report: "Airspace Rights and Subsurface Easements:

"As the construction plan is developed, the project will need to identify all locations where subsurface easements would be required. A temporary easement conveys certain

property rights Temporary... easements may be acquired for construction over locally-owned roads, the interstate, or the railroad, while subsurface easements may be required for utility relocation.” Considering all such easements whether temporary or permanent, could CRC advise the location together with details of all such plans i.e., present or future?

- 6-02 Does CRC have plans for requesting easements over the area occupied by Red Lion Hotel and adjacent Columbia Executive Building?
- 6-03 Does CRC have plans for requesting easements over any of the Columbia Waterfront property?
- 6-04 Assuming CRC has plans for easements as outlined in 6-02 and 6-03 can you forward a copy of such plans to Gramor Development, Inc.?
- 6-05 Considering mid point of the 263’ wide primary navigation channel in the Columbia River as designated by USCG and moving north from said point (in direction of Vancouver shore line) can you provide in increments of 50’ for the next 1,000’:
- a) Under the bridge soffit height?
 - b) Under the bridge soffit height over land and designate point from which said measure taken?
 - c) State maximum bridge height(s) over land and measurement point that constitutes the maximum?

7-00 Recreation/Marina/Columbia Waterfront Trail:

The existing marina/dock east of the Columbia Waterfront property is a significant recreational amenity. The Columbia Waterfront project includes plans for new recreational facilities including a trail along the shoreline. The DEIS indicates that the CRC project may result in impacts to the marina and indicates that a new facility could be developed. The DEIS does not include analysis of the location and impacts of new marina facilities or connectivity between the to the existing waterfront trail to the east of the I-5 bridge and the proposed trail along the Columbia Waterfront property to the west. These items should be analyzed in the FEIS.

- 7-01 How does CRC plan to protect existing Columbia waterfront trail during project duration?
- 7-02 Does CRC have plans to divert existing Columbia waterfront trail under the new bridge?
- 7-02 Can you supply details on Columbia trail connection plan?
- 7-03 Extract from CRC Technical Report: “...Purchase or build a marina and build new slips:” Does CRC anticipate leasing or purchasing the existing marina, identified as being some 200 yards west of the I-5 steel bridge on Washington side of Columbia River and adjacent to Gramor Development, Inc. property?

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Thank you for the opportunity to submit comments on the CRC DEIS. We look forward to seeing our comments and questions addressed in the FEIS for the CRC project. If you need additional information, please do not hesitate to contact either David Copenhaver or me at (503) 245-1976. Thank you.

Sincerely,
Columbia Waterfront LLC
By: Gramor Columbia Waterfront LLC
By: Gramor Investments, Inc.



Barry A. Cain
President

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