

From: [Jeff Nudelman](#)
To: [Draft EIS Feedback](#);
CC: [Gundersen, Heather](#);
Subject: Comment on DEIS
Date: Tuesday, June 17, 2008 9:37:29 AM
Attachments: [Draft EIS-Letter to Gundersen 6-17-08.pdf](#)

Dear Ms. Gundersen:

B-035-001 On behalf of Harsch Investment Properties, LLC, attached please find written comments on the Interstate 5 Columbia River Crossing Project Draft Environmental Impact Statement. Please contact the undersigned if you have any questions.

Very truly yours,

Jeff Nudelman

Jeff Nudelman
Associate General Counsel
Harsch Investment Properties
1121 SW Salmon Street
Portland, OR 97205
Main: 503-242-2900
Direct: 503-450-0819
jeffn@harsch.com
www.harsch.com

*** eSafe scanned this email for malicious content ***
*** IMPORTANT: Do not open attachments from unrecognized senders ***

B-035-001

Thank you for taking the time to submit your comments on the I-5 CRC DEIS. Thank you also for your organizations participation in the Stakeholder Group on the Marine Drive interchange, as discussed in the response to comment B-035-005.



June 17, 2008

**VIA FIRST CLASS MAIL AND
E-MAIL (DraftEISfeedback@columbiarivercrossing.org)**

Columbia River Crossing Project
c/o Ms. Heather Gundersen, Environmental Manager
700 Washington Street, Suite 300
Vancouver, WA 98660

RE: Comment on Interstate 5 Columbia River Crossing Project
Draft Environmental Impact Statement issued May 2, 2008

Dear Ms. Gundersen:

- B-035-002** Please accept these comments on behalf of Harsch Investment Properties, LLC in response to the Draft Environmental Impact Statement ("DEIS") regarding the Interstate 5 Columbia River Crossing ("CRC") Project. We are pleased to have an opportunity to provide you with feedback and look forward to working with you, and all of the related agencies on this exciting venture.
- B-035-003** We are the owners of the real property more particularly identified as: Property ID R238512, State ID 2N1E33C 1300, Alt Account# R649746550, Map Number 332N1E 0L, commonly known as 2650 N. Marine Drive, Portland, Oregon. It is of note that we did not receive notice that our property may be part of the Bridge Impact Area nor is it listed in Appendix D of the DEIS which is the Comprehensive List of Potential Property Acquisitions required by the physical improvements that comprise the alternatives evaluated in the DEIS.
- B-035-004** Harsch applauds the CRC and its members for the outstanding work it has done on this critical and life-changing project for the region. At Harsch, we are committed to improving each of the communities where we live and work and as part of our mission, we strive to add value to real estate properties which promote healthy work and living environments. To that end, we embrace the CRC's goal to reduce congestion and improve safety on Interstate 5 between Vancouver and Portland. While we are not, at this time, advocating any one of the five project alternatives set forth in the DEIS, we instead provide you with comments in connection with the planned redesign and rebuilding of several Interstate 5 interchanges from Victory Boulevard in Oregon to SR 500 in Washington. Specifically, our comments will be limited to the Marine Drive interchange.
- B-035-005** After a critical holistic review of the DEIS, it is clear that the only proposal with merit for the Marine Drive interchange is the one designated as the "Standard" design option that, according to the report, would retain most of the existing Marine Drive alignment. In that freight movements are heaviest within the Interstate 5/ Marine Drive interchange area serving the Port of Portland and the Columbia Corridor, it is imperative that any re-design of the area focus on improving the movement of freight traffic in a safe and efficient manner. In addition, we are sensitive to the wetlands area to the south of the Exposition Center and are concerned that some

1121 SW Salmon St., Portland, OR 97205 • Mail to: PO Box 2708, Portland, OR 97208 • Phone (503) 242-2900 • Fax (503) 274-2093 • www.harsch.com

B-035-002

Thank you for taking the time to submit your comments on the I-5 CRC DEIS.

B-035-003

Current designs of the Marine Drive Interchange would not require the acquisition of property from this parcel.

B-035-004

Thank you for taking the time to submit your comments on the I-5 CRC DEIS.

B-035-005

Following the publication of the DEIS in May 2008, and the selection of the LPA in July 2008, the CRC project team established a Stakeholder Group to provide feedback on the function and design of the Marine Drive interchange. This advisory group was comprised of a wide range of stakeholders with strong interests in the final design of this interchange including Metro; TriMet; the Oregon Department of Transportation; the City of Portland; the Port of Portland; trucking and distributions companies; the Audubon Society; nearby property owners or operators, such as Diversified Marine and the Metropolitan Exposition Recreation Commission; as well as community members from the surrounding Bridgeton, Kenton, and East Columbia Neighborhoods.

As discussed in Chapter 2 (Section 2.7) of the FEIS, working with this advisory group, the CRC project team conducted studies that analyzed the traffic operations, property impacts, and potential environmental effects for a range of potential interchange designs. The Marine Drive interchange design included in the LPA that is analyzed in the FEIS was developed with this stakeholder advisory group to balance many competing interests, including freight mobility, property impacts to nearby

B-035-005

of the proposed alternatives not only devastate the functionality of our property, but also have potential negative environmental impacts as well. The so-called “Southern realignment” and “Diagonal realignment” design options introduced in the DEIS, in addition to being far more expensive than the Standard design option, will each have negative impacts on the movement of freight through traffic changes and require additional and costly land acquisitions.

According to CRC’s literature, its goals associated with any changes to the Marine Drive Interchange are to:

- Improve freight access to Port of Portland and industrial areas by reducing grades and eliminating stops.
- Improve the safety for pedestrians and bicyclists from Columbia River to Expo Center.
- Reduce traffic back ups during peak travel times.¹

Unfortunately, neither the Southern nor the Diagonal interchange options would meet these express goals and would instead, cause the project to incur far greater costs and disturb both existing businesses and possibly environmentally sensitive areas as well.

B-035-006

Again, Harsch Investment Properties, a Portland based company that has proudly been in business for almost 60 years, is committed to working with civic, community and business leaders to forge a better future for our region. The CRC project will indeed be the seminal project of the 21st Century and we look forward to being an active participant in shaping the future of the Interstate 5 corridor. However, we encourage all those involved with the project to be mindful of the fact that this is a project grounded in the improvement of our transportation system and the focus should remain there, instead of straying into distracting areas beyond the scope of the project.

Very truly yours,



Jeffrey F. Nudelman
Associate General Counsel
Harsch Investment Properties

¹ Columbia River Crossing Highway and Interchange Fact Sheet, April 2008

properties, and environmental impacts. More detailed information regarding this process and its outcome is available in the Marine Drive Interchange Alignment Recommendation Process: Final Summary Report and Stakeholder Recommendation, available online in the project’s electronic library at www.columbiarivercrossing.org or by contacting the project office.

B-035-006

The Purpose of the CRC project is to improve Interstate 5 corridor mobility by addressing present and future travel demand and mobility needs in the Columbia River Crossing Bridge Influence Area (BIA). The project is seeking to meet this purpose in a way that maximizes environmental, economic, and community benefits in the project area.