

P.O. Box 1995  
Vancouver, WA 98668-1995



www.ci.vancouver.wa.us

June 30, 2008

VIA E-MAIL to [DraftEISfeedback@columbiarivercrossing.org](mailto:DraftEISfeedback@columbiarivercrossing.org)  
HAND-DELIVERED

Ms. Heather Gundersen, Environmental Manager  
Columbia River Crossing  
700 Washington Street, Suite 300  
Vancouver, Washington 98660

**Subject: City of Vancouver Comments on the Draft EIS for I-5 Columbia River Crossing**

Dear Ms. Gundersen:

**L-012-001** The City of Vancouver appreciates the hard work that has gone into developing information and analyzing potential impacts of the proposed I-5 Columbia River Crossing (CRC) project to date. We especially appreciate the collaboration with city staff from a variety of departments that has occurred as the Draft Environmental Impact Statement (DEIS) was developed. There are still a number of issues and potential impacts to be resolved, as shown on the attached matrix of comments, and we are committed to continuing to work with the I-5 CRC team to resolve them.

**L-012-002** Our major concerns are two:

1. The proposed project must be refined to avoid impacts to Vancouver's downtown and redevelopment efforts, to the Vancouver National Historic Reserve (VNHR) and to the neighborhoods adjacent to the project, and

**L-012-003** 2. The overall cumulative impact of the proposed project and its components on the historic cultural landscape of Vancouver is not clearly defined in the document and thus, is not adequately mitigated.

**L-012-004** The City of Vancouver has been working very hard for over a decade to achieve our goal of a revitalized livable downtown linked to the VNHR and to the Columbia River waterfront. Years of planning, fundraising and construction have gone to protecting our historical legacy and building sensitively for the future, including the methodical connection of these historic resources and landscapes to foster an interpretive experience out of isolated resources and locations. We have accomplished quite a bit – the Land Bridge, the Waterfront Trail, Esther Short Park renovation, the new Conference Center Hotel, mixed-use developments around the Park, the Farmers Market, rehabilitation of the Red Cross Building on the VNHR, improvements to Old Apple Tree Park, the Witness Tree Monument, the Captain George Vancouver Monument and Vancouver Landing are part of the effort to honor the past and establish linkages. We have plans to do more toward our goal – to open access to the Columbia River waterfront under the BNSF railroad berm at Esther and Grant Streets, to partner in the Riverwest mixed-use development, including a new central library, to improve the Discovery Loop trail linking the VNHR to downtown, to rehabilitate and reuse historic West Barracks structures, including the Post Hospital, and to build a pedestrian bridge at Seventh Street to link downtown to the Historic



### L-012-001

Thank you for your comments and the City of Vancouver's ongoing involvement in the project.

### L-012-002

Thank you for taking the time to submit your comments on the I-5 CRC DEIS. We address your specific issues and recommendations below.

### L-012-003

This overall concern is articulated in a little more detail later in the letter, and thus more effectively addressed in those comments. However, this general concern about potential cumulative impacts to the historic cultural landscape is addressed in Chapter 3 of the DEIS. Section 3.8 of the DEIS evaluates potential direct and indirect effects to historic and cultural resources as a result of the CRC project, and Section 3.19 assesses a variety of potential cumulative effects of this project, past actions, and reasonably foreseeable future projects on this cultural landscape, including neighborhoods, historic resources, and archaeological resources. The FEIS includes updated evaluations of how this project may affect the cultural landscape in Vancouver, including any related cumulative effects.

### L-012-004

We agree that the City of Vancouver has been rapidly progressing in its downtown revitalization, in its reuse of the historic barracks buildings, and in the achievement of a variety of planning goals. We have worked hard to provide a light rail system and highway improvements that will complement the progress that has been made and will be compatible with the remaining projects.

**L-012-004** Reserve. We believe the I-5 CRC project can contribute to achieving the city's goal, but it is not reflected in the DEIS analysis or mitigation.

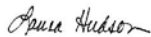
The City of Vancouver has a rich and vibrant history that gives us a unique identity and is one of the keys to our future. Years of City resident, business and stakeholder initiatives have focused on connecting and enhancing the cultural, historic and interpretive landscape of Vancouver, and preserving historical resources and landscape elements. As one of the Northwest's earliest settlements, honoring and preserving our history is a prominent and central purpose that the City has committed to through actions and adopted plans. The improvement of I-5 and implementation of light-rail-transit should promote and enhance this legacy.

**L-012-005** Perhaps it is a result of the many components of the project (highway design, bridge design, transit options) and/or of the preparation of the EIS by separate teams focusing on their areas of expertise (economics, air quality, historic resources, etc.), but whatever the reason, the result is a patchwork of analysis that never clearly addresses the big picture. The DEIS does not acknowledge the cultural landscape that the project will cross, treating each area in isolation – the VNHR, downtown, Central Park, the neighborhoods. The DEIS also fails to acknowledge the local effort to maintain and enhance linkages across I-5 and with the past, and the importance of these linkages to the cultural landscape. Mitigation measures are proposed that would adversely affect this landscape and its livability (e.g., 10 to 18 foot sound walls within 10 feet of historic buildings or residences) without analysis or even acknowledging the impacts of these mitigation measures.

Interstate 5 is a major transportation facility that already takes up a lot of land in Vancouver. We have worked to build linkages around it. The CRC project will be larger and more visible, but should avoid taking more land and creating a barrier. We believe that further refinement of the design should work to achieve avoidance of all impacts to properties along the freeway. We believe it is possible to improve safety, reduce congestion and bring light rail to Vancouver without moving the roadway closer to the VNHR and without taking any property from the downtown, from Central Park or from the neighborhoods. We will work with you and the creative team of CRC designers to achieve this.

Again, we appreciate all the work that has gone into the DEIS. We are committed to working with you to complete the environmental analysis and inform the public so that we can make an informed decision.

Sincerely,



Laura Hudson  
Community Planning Manager

c: Pat McDonnell      Jan Bader  
Thayer Rorabaugh    Brian Carlson  
Victor Ehrlich        David Scott  
Eric Holmes            Matt Ransom  
Phil Wuest             Jeroen Kok

## L-012-005

The technical reports which provided the foundation of the DEIS addressed the cultural landscape of the City, the Cultural Landscape Plan for the Reserve, and the potential for regional impacts of elements such as land use and economics. If there is a specific aspect of the cultural landscape that we are likely to impact and have failed to address, please identify such for us.

In the DEIS, sound walls were only preliminarily identified for areas along the Reserve. We understand the potential for sound walls, themselves, to cause impacts such as those you describe. We have also been asked by regulating agencies and the National Park Service to provide sound impact mitigation and landscaping. Some of the walls along the West Barracks have been redesigned. The project has contributed considerable support and financing for the design competition for the Community Connector.

The project engineers and planners have worked diligently to minimize right of way impacts. As you can see in Chapter 3 (Section 3.3) the FEIS, there is very little property acquisition associated with the project. The project will displace very few residents or businesses in Washington. But, limited property impacts are unavoidable. The City has supported the decision to construct the locally preferred alternative, which provides auxiliary lanes and cannot entirely fit within the existing right of way.

City of Vancouver Comments on Columbia River Crossing DRAFT EIS				
CHAPTER	PAGE	SECTION	LINE	COMMENT
<b>SUMMARY</b>				
L-012-006	S-14	Alternative 4	Figure: Supplemental Crossing with BRT	Shows primary bike/ped pathway on only one side. There is a pathway on the other side too and PBAC recommended widening both sides if this option is chosen.
	S-16	Alternative 5	Figure: Supplemental Crossing with LRT	Shows primary bike/ped pathway on only one side. There is a pathway on the other side too and PBAC recommended widening both sides if this option is chosen.
	S-19	Multimodal River Crossing & Highway Improvements	Exhibit 16	Should show bike/ped pathway on Southbound downstream side of bridge not northbound structure.
	S-21	Multimodal River Crossing & Highway Improvements	Exhibit 18	Shows primary bike/ped pathway on only one side. There is a pathway on the other side too and PBAC recommended widening both sides if this option is chosen.
<b>CH 1: PROJECT PURPOSE &amp; NEED</b>				
L-012-007	1-3	1.3, Purpose & Need	Project Purpose	The fundamental project purpose & need is to <i>improve Interstate 5 corridor mobility by addressing present and future travel demand and mobility needs in the Columbia River Crossing Bridge Influence Area (BIA)</i> . It then goes on to describe specific project objectives all solely in terms of the freeway and river crossing. The purpose and need fails to recognize that this project bisects 5 miles of urban development in Portland and Vancouver. The actual infrastructure of I-5 includes many local roadway over-crossings and under-crossings, pedestrian and bicycle crossings, existing sound walls, and other infrastructure. In short, the freeway is simply one component of a complex overlay of many components of public transportation infrastructure. As a result, the mobility needs and impacts of this project extend beyond the boundaries of the end of a freeway ramp, or the sound wall at the edge of the freeway shoulder. The mobility needs identified in the purpose and need

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**L-012-006**

The project is no longer considering Alternative 4 or 5, and therefore figures related to these alternatives were not carried into the FEIS. Please refer to Chapter 2 of the FEIS for a full description of the LPA, including the location of bicycle and pedestrian pathways for the multimodal river crossing and highway improvements.

**L-012-007**

The Purpose and Need is based on extensive analysis of the existing and projected transportation problems in the I-5 CRC corridor, and reflects extensive feedback from the public and stakeholder groups. The Purpose and Need focuses largely on metrics that do not inherently require substantial, or exclusive, increases in highway capacity. The purpose statement is intentionally worded so as to allow consideration of a wide range of solutions including demand management, transit, highway, tolling, and other options for addressing the stated needs. Following the development of the Purpose and Need statement, analysis of a wide range of alternatives, and input from the public, agencies and stakeholders on those alternatives and analysis, it became clear that that the Purpose and Need could not be met by any single type of improvement. It is best met by a multimodal alternative that improves highway, transit, and bicycle and pedestrian facilities in the I-5 corridor, and adds tolling to the highway river crossing.

Other factors that you have listed, such as vibrant land use, aesthetics and community cohesion, are not part of the fundamental purpose of the project, but they have been and are continuing to be carefully evaluated and considered in project analyses and decision-making.

City of Vancouver				
Comments on Columbia River Crossing DRAFT EIS				
CHAPTER	PAGE	SECTION	LINE	COMMENT
L-012-007				legitimately and necessarily include mobility impairments and impacts caused by the project to travel by all modes for many intra-urban trips that never even enter the freeway. The project objectives fall short in failing to recognize this fundamental and unmistakable characteristic of the freeway—it is a part of the urban fabric. By rending that fabric, the only way to adequately repair the damage is to ensure that each thread of the community is knit back together by the replacement infrastructure. To do otherwise would be to grossly simplify and ignore the true role and impact of the I-5 corridor infrastructure on our community. These aspects of the project are recognized on page 1-7 in the Project Vision and Values. There, community livability, vibrant land use, aesthetic quality, community cohesion, and providing congestion reduction and mobility, reliability, an accessibility for all users and recognizing the requirements for local, intra-corridor travel are of the utmost importance to the project stakeholders. The impacts of the project must really be described in terms not just against the objectives of the freeway project, but in the context of the role of that freeway infrastructure within our community in order to be consistent with and to implement the vision and values of the project as described on pages 1-7 and 1-8 of the DEIS. The alternatives analysis presented in the DEIS falls well short of meeting those goals.
L-012-008	1-5		Bullet 1	Correct widths of current bike/ped facility. The minimum free and clear space is ~4 feet at bottlenecks. Add air quality, traffic safety (crossing ramps), debris issues (bird and car), user security issues of existing bridge.
<b>CH 2: DESCRIPTION OF ALTERNATIVES</b>				
	2-7 to 14	Exh 2.2-5 to Exh 2.2-9		Please include height measurements of different options (or use ghosted out image of old bridge deck) as height of future facilities is important and will affect access to bridge by future bikers and pedestrians due to health issues, vertigo, and length of facility.
L-012-009	2-9	2.2	Graphics	These graphics (exhibit 2.2-6) illustrate high capacity transit alignments on 6 <sup>th</sup> Street in lower downtown Vancouver. Converting 6 <sup>th</sup> Street to a high frequency transit corridor that would take any capacity away from

**L-012-008**

We have revised the documentation of deficiencies of the existing facility. The new facility will rise and fall at more gentle grades. This will actually allow more users, including those who have mobility limitations, to safely utilize the bridge. Currently, bridge users with vertigo have to ride next to (within two feet) of the edge of the bridge deck. Riders will be able to use the new facility without riding next to the edge, overlooking the water.

**L-012-009**

The LPA includes light rail in downtown Vancouver with a Washington-Broadway couplet. As shown in Chapter 2 of the FEIS, the light rail tracks travel east between Washington and Broadway on 7th Street.

City of Vancouver				
Comments on Columbia River Crossing DRAFT EIS				
CHAPTER	PAGE	SECTION	LINE	COMMENT
L-012-009				automobile travel is inconsistent with the Vancouver City Center Vision Transportation Plan. 6 <sup>th</sup> Street is NOT a viable HCT alignment route. The traffic technical report should, if it does not, address the direct impact of taking capacity off 6 <sup>th</sup> Street on traffic, on land use, and on accessibility. Note: this graphic and problem exists THROUGHOUT the document. I will not comment on each and every one, but the comment here refers to the same error wherever it occurs in the DEIS or technical reports.
	2-11	2.2	Graphics	Example: Same comment as above
	2-13	2.2	Graphics	Example: Same comment as above
	2-15	2.2	Graphics	Example: Same comment as above
L-012-010	2-19	2.3.1	3d paragraph	Internal inconsistency and failure to identify impacts. Here the text indicates that the Pedestrian and Bike facility may only be 12 feet wide. In other locations in the document the width is described as at least 16'. There is no analysis of the impact—safety, level of service, aesthetic—of building a 12' wide facility. This should be revised, or a comprehensive evaluation of a 12' facility undertaken. There is no information in the DEIS that allows us to evaluate the impact of a minimum 12' facility in place of a minimum 16' facility.
	2-22 to 23	2.3.1	Last line to top of next page	<i>...current designs have the primary pathway west of and adjacent to the high-capacity transit alignment and a secondary pathway on the east side, as recommended by PRAC.</i>
	2-23	2.3.1	1 <sup>st</sup> full paragraph	3 <sup>rd</sup> line: <i>...both pedestrians and bicyclists in <del>safe</del> an improved manner.</i>
	2-28	2.3.1	Exh 2.3-8	DEIS failed to disclose known information. Show how proposed traffic routing and ramps from SR500 will facilitate current bike traffic exiting from SR500 onto local street grid and bike lanes (E 39 <sup>th</sup> St, NE 15th St, and P St.) This is also missing for the SR14 to I-5 NB ramp – as bikes are allowed to exit there to Mill Plain.
L-012-011	2-29	2.3.1	Exh 2.3-9	DEIS failed to disclose known information. Update transit route number to reflect current services.

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**L-012-010**

Please refer to the FEIS (Chapter 2 and Section 3.1) for revised and more exact definition of the bicycle system and facilities.

**L-012-011**

Since the LPA does not include bus rapid transit, the FEIS does not include the exhibit referenced.

City of Vancouver				
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CHAPTER	PAGE	SECTION	LINE	COMMENT
L-012-012	2-32	2.3.3		DEIS failed to address known conditions. Bike accessway and bike parking facilities at each P+R and at all ICT stations. So far only car parking is addressed.
L-012-013	2-32	2.3.3	Exh 2.3-14	This table (and in fact the entire document) describes one of the MOS alternatives as the "Clark College" MOS. Whether by design or accident, this is a misleading characterization that leads readers to believe that the station location will actually serve Clark College. In fact, the information disclosed in the document is clear that the station is a park and ride terminus located directly adjacent to Interstate 5 with little, if any, land use benefit or accessibility. The real location of the Park and Ride might better be called the I-5 Park and Ride south of Fourth Plain Boulevard, and right next to the freeway. This is important because the mischaracterization is a serious oversight that leaves readers with the impression that the station will actually serve the college. The possible station locations are, via ADA walking routes, over ½ mile to the main Clark College Buildings, such as the Student Union. Further, there is no information to indicate that there is any ridership generated by the College that would warrant calling the station the Clark College MOS.
L-012-014	2-35	2.3.3	Downtown Vancouver to Mill Plain District	DEIS failed to suggest reasonable mitigations. Add mention of mitigations where bike and ped facilities are modified. And how these negative impacts could be minimized if on street parking is avoided – such as at station areas.
L-012-015	2-36	2.3.3	Exh 2.3-18	DEIS failed to disclose known conditions and possible impacts. Additional exhibits for section 2.3.3 should show the street lane layouts in blocks with stations vs. only showing areas without stations.
L-012-016	2-36	2.3.3	Exh 2.3-19	A design option of showing a bike lane on couplet should be shown vs. on street parking per CoV Comprehensive plan goals and CoV TSP Bike Framework Plan. <a href="http://www.cityofvancouver.us/upload/contents/500/bikevelmap.pdf">http://www.cityofvancouver.us/upload/contents/500/bikevelmap.pdf</a>
	2-37	2.3.3	Exh 2.3-20	A design option of showing a bike lane on couplet should be shown vs. on street parking per CoV Comprehensive plan goals and CoV TSP Bike

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**L-012-012**

The final design will address bicycle parking.

**L-012-013**

The park and ride and transit station are located on current Clark College property, and property will need to be purchased from Clark College to build the park and ride. The facility will be immediately adjacent to Clark College.

The official name of the station and associated park and ride will not be finalized until after the FEIS process.

**L-012-014**

Regarding impacts to the bicycle system, please refer to the responses provided to your similar comments. The project is making substantial improvements in the bicycle system at many interchanges and across the river. The FEIS provides more detailed assessments of impacts than was possible for the DEIS.

**L-012-015**

In Chapter 2 of the FEIS, exhibits showing the transit alignment for the LPA are updated to show station blocks and non-station blocks.

**L-012-016**

In partnership and in agreement with City of Vancouver representatives, the downtown network has been planned with the assumptions that Columbia would provide the north-south bike lane in the downtown. On-street parking along the transit couplet will not be converted to bike lanes.

City of Vancouver				
Comments on Columbia River Crossing DRAFT EIS				
CHAPTER	PAGE	SECTION	LINE	COMMENT
L-012-016				Framework Plan. <a href="http://www.cityofvancouver.us/upload/contents/500/bicyclemap.pdf">http://www.cityofvancouver.us/upload/contents/500/bicyclemap.pdf</a> This facility currently has bike lanes and is an important east-west link to the college and high school and neighborhoods with a very high percentage of non-car-owning households.
L-012-017	2-38	2.3.3	Exh 2.3-21	DEIS failed to disclose known conditions and possible impacts. Additional exhibits for Section 2.3.3 should show the street lane layouts in blocks with stations vs. only showing areas without stations.
	2-38	2.3.3	Exh 2.3-21	A design option of showing a bike lane on complet should be shown vs. on street parking per CoV Comprehensive plan goals and CoV TSP Bike Framework Plan. <a href="http://www.cityofvancouver.us/upload/contents/500/bicyclemap.pdf">http://www.cityofvancouver.us/upload/contents/500/bicyclemap.pdf</a> This facility has planned bike lanes and provides access to the VSAA high school and neighborhoods with a very high percentage of non-car-owning households.
L-012-018	2-41	2.3.6	Transportation System & Demand Management Measures	There should be mention of the success of the TDM measures used during the September 1997 I-5 trunion repair project.
<b>CH 3: EXISTING CONDITIONS &amp; ENVIRONMENTAL CONSEQUENCES</b>				
<i>3.1: Transportation</i>				
L-012-019	3-13	3.1.2	1 <sup>st</sup> paragraph	Add discussion about the proposed extension of the Waterfront trail to the west. Two paragraphs prior to this one discuss major trail improvements on the Portland side. The waterfront trail needs to be mentioned in this paragraph as an important project that will be extended with the Boise-Cascade site waterfront project.
				The DEIS fails to indicate the number of trail users using waterfront trail facility on north bank of Columbia, and the need for access to the Old Apple Tree or Waterfront Parks from those users and the impacts of not providing

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**L-012-017**

Please see response to comment L-012-015.

**L-012-018**

Though not discussed in the DEIS or FEIS, the CRC project team uses the trunion project as an example of Northwest projects that have successfully used TDM during construction. Discussing case studies in the DEIS and FEIS would only add to the length of the documents without clarifying the actual mitigation that would be included. See Chapter 2 of the FEIS for an updated discussion of relevant elements of TDM that would be employed during CRC construction.

**L-012-019**

A discussion of the planned extension of the Waterfront Trail, as well as alterations to access from this trail to nearby parks, has been added to the FEIS. Please see Section 3.7 of Chapter 3, Parks and Recreation, for this discussion.

City of Vancouver				
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CHAPTER	PAGE	SECTION	LINE	COMMENT
L-012-019				access or alterations of access on that user group.
	3-23		No-Build: Local Street Performance	Add bullet: <i>Increased traffic congestion and lane reconfigurations would degrade overall bike safety and access to the I-5 bridge, bike parking and overall street network.</i>
L-012-020	3-30	3.1.3	Alt. 2, Ped and Bike	The DEIS failed to analyze the impact of removing direct pedestrian and bicycle access to Columbia Way adjacent to the waterfront trail and 4(f) resources that are along this pathway. In the first paragraph it states that this alternative <i>would substantially improve bicycle and pedestrian connectivity</i> which has not been studied and cannot be supported. The existing bridges currently provide bicycle and pedestrian facilities on both sides of the crossing, with direct access to the Vancouver waterfront for both directions. This alternative only provides a pathway on one side of the bridge crossing, with indirect access to the Vancouver waterfront. This is a <b>direct impact</b> that has not been studied, with no proposed mitigations. The current access points to the bridge provide a direct access to the Waterfront Trail, the Old Apple Tree Park, the Confluence Land Bridge, and the Historic Reserve, all of which are Vancouver 4(f) resources.
	3-30 & 3-31	3.1.3		The DEIS failed to analyze the impacts of the project actions on pedestrian and bicycle access and safety within the BIA. Where it exists, the analysis included in the DEIS is superficial, anecdotal and inconclusive.  Neither the Alternative 2: Peds & Bikes section on p 3-30 nor the Transit Safety & Security section on p. 3-13 addresses the impacts to pedestrians and bicyclists off the freeway facility. The discussion of addition of facilities on the river crossing itself is wholly inadequate to determine what the true long-term impacts will be for pedestrian and bikes throughout the project influence area—including the ramp terminals and interchange areas, as well as the highway over-crossings, and in and around transit facilities along the entire project alignment.
	3-30 & 3-31	3.1.3		The DEIS failed to analyze the impacts of the project actions on pedestrian and bicycle access and safety within the BIA. Where it exists, the analysis

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**L-012-020**

The FEIS provides more information on proposed bike pathways and facilities, their safety, and the potential impacts of construction.



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CHAPTER	PAGE	SECTION	LINE	COMMENT
L-012-020				included in the DEIS is superficial, anecdotal and inconclusive.
L-012-021				Further, on p. 3-31 the Transit Safety and Security section simply provides a conceptual overview of what safety and security issues may exist. There is no analysis, beyond the bare speculation presented, of the real transit project impacts. There has been no detailed evaluation of implementation of the proposed park and ride location traffic impacts, nor of the impacts of the bus system around those stations on the traffic, air quality, pedestrians, bikes, businesses, residents, crime, or any other impact. Speculation that the alternative would <i>potentially increase</i> the risk of collision is wholly insufficient to draw any reasonable conclusion about likely significant impacts. See also p. 3-33 and others. A detailed evaluation of the proposal WITH the park and rides in place, and WITH the bus operations in place will be needed to determine impacts and mitigations.
L-012-022	3-30 & 3-31	3.1.3		The DEIS fails to sufficiently analyze the safety related conditions for bikes and pedestrians using existing off street paths within BLA. Given the proposed disruptions and detours, and alterations of existing pathways streets, in particular changing the function and character of Columbia to include primary access to/from SR-14, and the northward terminus of the Replacement Bridge option bike/ped facility, there will be adverse impacts to safety and breaks in access that were not sufficiently analyzed and no mitigation measures proposed.
L-012-023	3-33	3.1.3		This section does not include mention of traffic congestion and travel times associated with Alternative 3 like that presented for Alternative 4. It is difficult to distinguish and compare the impacts between alternatives when different information is presented for each. This section needs to be re-organized so that the alternative impacts can be meaningfully compared. What's more, while potential impacts and mitigations are identified in some locations (but not consistently!), they are not in others. For example, p. 3-37, top of page, 2 <sup>nd</sup> paragraph, includes a discussion of how travel demand at from Marine Drive and Hayden Island wouldn't be able to access the

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**L-012-021**

Planning for safety and security on and around light rail is a high priority. The light rail system will be designed to promote safe interactions between light rail trains, cars, bicycles and pedestrians. Through a cooperative team effort and the systematic application of safety and security principles, the project will be designed and constructed to run safely, securely, dependably, and efficiently. A Safety and Security Management Plan (SSMP) was created, in part, to address public concerns about safety, and is a requirement for funding from the Federal Transit Administration.

Safety measures that will be designed into the project as appropriate include 1) physical barriers such as medians, fencing, landscaping or chain and bollard to help channel automobiles, pedestrians and bicyclists; 2) signage, tactile pavers, audio warnings, and pavement markings at the track crossing to alert individuals they are approaching tracks; 3) active treatments such as flashing lights, bells, illuminated and audible warning devices in traffic signals; 4) Creating inviting, well-lit platforms and station areas; 5) maintaining clear sight lines for the oncoming train and 6) implementing a public safety education campaign before the start of service.

According to the United States Bureau of Transportation Statistics, public transportation represents less than one percent of the national average of all street and highway fatalities. Light rail is one of the safest forms of public transportation. As described on page 3-56 of the DEIS, collisions on TriMet's light rail system have decreased over the years. For more information on how the CRC project is accounting for safety in the design of light rail, please see Chapter 3 (Section 3.1) of the FEIS.

All other impacts associated with the park and rides (air quality, visual, traffic) were fully assessed as part of the project.

City of Vancouver				
Comments on Columbia River Crossing DRAFT EIS				
CHAPTER	PAGE	SECTION	LINE	COMMENT
L-012-023				freeway, but fails to detail out the impacts, or to offer observations on potential impacts. This is a problem throughout this section and makes meaningful conclusions regarding the impacts of the alternatives and potential mitigations very difficult to draw.
L-012-024				The traffic study travel time analysis is insufficient. This travel time analysis should also include estimates of before and after for bike and pedestrian traffic, ...to include intersection delay entering leaving the BIA due to more traffic, signalization changes, longer bridge lengths, out of direction travel especially to reach shoreline trails, higher elevation to reach bridge top, etc.
				The DEIS failed to address the travel times through BIA for bicyclists under all scenarios. The length of delay crossing bridges and traveling through intersections to reach new bridge or across park and rides with more traffic should be evaluated. The length of time to across the new higher/ longer bridge and associated intersections with more traffic should not be worse than no-build scenario or replacement scenarios.
L-012-025	3-38 & 3-39			See p. 3-39 first for a description of the bus transit frequencies, then turn back to p. 3-38 for a discussion of impacts of the alternatives to Vancouver local street performance. P. 3-39 discusses high frequency of service, while p. 3-38 doesn't even mention potential impacts to city streets (traffic, pedestrian, land use, air quality, etc.) from this alternative. Similar problems in other parts of this section (describing each of the 5 alternatives). Failure to disclose and discuss potential impact makes it very difficult to determine just what the real impacts and potential to mitigate are. See p. 3-51 Transit mode local street performance for an example of how the information presented really fails to address these issues in a meaningful way.
L-012-026	39	3.1.3	Alt 4, ped and bike	The DEIS failed to analyze the impact of removing direct pedestrian and bicycle access to Columbia Way adjacent to the waterfront trail and 4(f) resources that are along this pathway. In the first paragraph it states that this alternative "would substantially improve bicycle and pedestrian connectivity" which has not been studied and cannot be supported. The existing bridges currently provide bicycle and pedestrian facilities on both

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**L-012-022**

The FEIS includes more construction impact documentation. The project is making a considerable investment in bike and pedestrian infrastructure. Additionally, the project has continued to work with bike and pedestrian advocates, the City of Vancouver and the Pedestrian and Bicycle Advisory Committee on refinements and improvements in numerous locations where inter-modal conflicts may arise.

**L-012-023**

The DEIS summarized information critical to the decision at hand. The Traffic Technical Report, which was published as an appendix to the DEIS, did provide the detailed information necessary to fully compare many aspects of the alternatives. In addition to this project's voluminous reporting and documentation, CRC staff have been meeting with the City of Vancouver's transportation planning staff on a regular basis for years. In these meetings, the details of modeling assumptions, system performance, and potential impacts have been disclosed, discussed, and revised. Lastly, because an LPA was selected, the FEIS is able to provide a more detailed discussion of project impacts and mitigations.

**L-012-024**

There is more detail provided in Chapter 2 and Chapter 3 (Section 3.1) of the FEIS. The travel times will improve as a result of the shorter distance, the reduced grades, and the elimination of at grade street crossings.

**L-012-025**

The FEIS includes local street performance analysis specific to the LPA. The analysis in the FEIS Chapter 3 (Section 3.1) is expanded from the DEIS, and the Traffic Technical Report expands even further. The Vancouver local street performance analysis is based on performance standards for the facilities under the jurisdiction of the City of Vancouver.

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L-012-026				sides of the crossing, with direct access to the Vancouver waterfront for both directions. This alternative only provides a pathway on one side of the bridge crossing, with indirect access to the Vancouver waterfront. This is a <b>direct impact</b> that has not been studied, with no proposed mitigations. The current access points to the bridge provide a direct access to the Waterfront Trail, the Old Apple Tree Park, the Confluence Land Bridge, and the Historic Reserve, all of which are Vancouver 4(f) resources.
	3-48 to 3-49	3.10.3	Starting at last paragraph	It states in this paragraph that the replacement bridge option would have the bike and ped path land at approximately 6 <sup>th</sup> Street. If you measure from the point on the east side of the bridge where a pedestrian comes off at the bridge path at Columbia Way where they can access the trail, they will have to walk over a half of a mile to reach this same point with a bridge path on one side as being proposed. Right now they have to walk about 100 feet to access the Waterfront Trail. By removing this current facility with only one pathway you are eliminating direct access to the Waterfront Trail, the Old Apple Tree Park, the Confluence Land Bridge, and the Historic Reserve, all of which are Vancouver 4(f) resources. This holds true for pedestrians on the west side of the bridge as well. The new proposed pathway will require them to walk the same distance. There is a second "potential" connection mentioned that would be closer to the waterfront. This should not be a consideration, but a required mitigation for the 3000% increase in travel distance.
				The DEIS failed to address the impact of removing bicycle and pedestrian access, and creating longer travel distances with the project action. The replacement bridge option discusses one pathway on the east side that would land around Old Apple Tree Park. This would require pedestrians traveling over 1,000 feet out of direction in order to reach the same point they currently can at Columbia Street. The impact to eliminating access on the west side of the bridge needs to be addressed.
L-012-027	3-50			Add statement: Interstate bike/ped traffic traveling along I-5 should be given priority at intersections if at grade crossings are allowed – due to the use by

For more information, please see Chapter 3 (Section 3.1) of the FEIS and the associated section of the Traffic Technical Report.

**L-012-026**

We have appreciated meeting with representatives from the City of Vancouver dozens of times on these issues. The resulting agreements and designs are well documented in the FEIS. Please refer to Chapter 2 and Chapter 3 (Section 3.1) for details on the new designs including the overall distance of the river crossing and how it compares favorably with the existing crossing in distance, grade, safety, and other factors.

**L-012-027**

Crossing regulations for bicyclists and pedestrians at intersections will be the jurisdiction of local or state governments.

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L-012-027				<u>vulnerable road users and effort to minimize overall delay so as to meet policy goals of increasing bike/ped traffic as percentage of all trips.</u>
L-012-028	3-61	3.1.4	Clark College Minimum Operable Segment: Local Street Performance and the following section	While these sections purport to address local street performance of the location of a park and ride facility, there is no information presented upon which reasonable conclusions may be drawn. Beyond a broad regional travel demand model evaluation of the park and ride location effectiveness, there is no information presented regarding the actual traffic impacts to Vancouver's city streets (such as Fourth Plain, Mill Plain, McLoughlin, & others) of placing a large park and ride facility, and providing access to it from local streets. Without an evaluation, no impacts can be identified; without impacts identified, it is impossible to determine what, if anything, could mitigate those impacts. The lack of disclosure and apparent analysis of such a major project component is both alarming and suspicious; and makes it nearly impossible to draw meaningful conclusions (beyond the broad conclusory observations offered) regarding potential project impacts. This same comment holds true for each of the transit terminus options. Failure to adequately evaluate the roadway, neighborhood, safety, economic, and other impacts associated with the location of these park and ride facilities, and the additional auto and bus traffic they will generate is a serious shortcoming that must be remedied to fully disclose all potential project impacts.
	3-67	2-way Washington or Washington/Broadway Couplet	Bottom of the page	Although the text explains the 35% increase in cost to build the couplet, the section is still misleading in terms of the overall cost. It would be better to present either a hard number that can be compared against the total cost of one of the alternatives, or to present the cost in terms of a percentage of the total transit cost for one of the complete alternatives, such as the Clark MOS. Simply presenting it as a 35% cost increase, despite the qualifying text, is misleading.
	3-68			See comment regarding pg 3-61, Section 3.1.4, Clark College Minimum Operable Segment: Local Street Performance and the following section and read the section on two-way Washington or Washington-Broadway transit.

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**L-012-028**

The CRC project modeled how drivers would access the three proposed Park and Ride lots in Vancouver during the morning peak commute. Two of the three Park and Rides – Clark College and Columbia Park and Rides – are located near major highways (I-5 and SR 14). The Mill Plain Park and Ride, though not adjacent to I-5 or a state route, is located between two major arterials, Mill Plain and Fourth Plain Boulevards. This modeling confirmed the majority of drivers (69%-92%) would access the park and rides from major roads including I-5, SR 14, SR 500, Mill Plain and Fourth Plain.

Following the selection of the LPA, the CRC, working with the City of Vancouver, enlisted the help of community members - residents, business owners, transit-dependent populations and commuters - who had interest in light rail planning to form the Vancouver Working Group (VWG). The VWG met regularly to develop recommendations and provided feedback to the CRC project, the City of Vancouver and C-TRAN on transit alignments, proposed station locations and design, security and park and ride facilities in downtown Vancouver. Following approximately 5 months of coordination, in addition to public open houses and walking tours, the VWG recommended the Washington-Broadway Couplet through downtown Vancouver to C-TRAN and City of Vancouver staff. Per the Vancouver Working Group Final Report (October 2009), this alignment was preferred largely because it spread the potential impacts and benefits across two streets, as opposed to concentrating them on a single street. This alignment was adopted as part of the LPA and is analyzed in the FEIS. For more information on the transit alignment decision-making process please see Chapter 2 (Section 2.7) of the FEIS.

Since the decision was made to proceed with the Washington-Broadway couplet, the section of the DEIS comparing two-way Washington to the Washington-Broadway couplet has been removed and the description of

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L-012-028				couplet. If you read it carefully, you'll realize that it really says nothing at all . . . it is just a bunch of words string together that do little to draw out meaningful conclusions regarding impacts or potential mitigations.
	3-71	Vancouver Local Streets		DEIS failed to account for full impacts and proposed reasonable mitigation measures for local street impacts of the various transit options considered. Analysis is ambiguous and does not lead to conclusive findings as to whether mitigation measures identified in tables 3.1-32 and 3.1-53 can be implemented and whether implementation of any or all of these mitigation measures would resolve and sufficiently mitigate the proposed action or whether implementing any of all of these measures would in net result in additional impacts that would need to be mitigated.
L-012-029	3-73 to 74	Bridge Toll		This section describes the traffic impacts of the tolling alternatives, but does not present any information on other tolling impacts, as mentioned in the previous comment – the incidence of benefits and burdens of the tolling alternative must be disclosed.
L-012-030	3-76	Temporary Effects: Regional Traffic	4 <sup>th</sup> full paragraph	As with other mitigations identified in this document, here there is no discussion of the impacts of the proposed re-routing of traffic to I-205. Who will be impacted? Will there be air quality, noise, or economic impacts? Safety impacts on SR-500, I-205 or SR-14? Additional congestion or delay that will result from the re-routing of traffic? If so, how will those impacts be mitigated?
	3-76			DEIS failed to recommend a reasonable mitigation measure, and the proposed mitigation causes a resulting significant impact that will need to be mitigated. Detour of bike/ped traffic to I-205 during construction closure (PM and weekends) of I-5 is UNACCEPTABLE. Please include mitigations other than rerouting to I-205.
L-012-031	3-76			DEIS failed to identify sufficient mitigation measures for known impacts. See Temporary Effects: Transit and bike access across the Columbia within the BIA will have to be enhanced greatly (not degraded) if motorists are to successfully change travel modes to avoid some of these construction

the impacts and mitigations of the couplet have been refined.

The adoption of an LPA allows for greater refinement and analysis of that option in the FEIS. The FEIS includes a more detailed analysis of impacts and mitigation measures regarding the light rail alignment. Please see Chapter 3 (Section 3.1) for more information.

**L-012-029**

Findings regarding the impacts of tolling can be found throughout Chapter 3 of the DEIS and the FEIS. The different sections of the FEIS discuss the implications and impacts of tolling in the context of economics, traffic, transit use, land use, environmental justice, and climate change.

**L-012-030**

I-5 would remain open to traffic throughout project construction, though temporary lane closures may be required. These temporary lane closures would likely occur during the night to minimize impacts. Drivers with destinations north or south of the Portland/Vancouver area may be encouraged to use I-205 to avoid the construction, but drivers traveling within the project area would be able to access their destinations. It is expected that some drivers would choose to use I-205 to avoid construction, which may result in increased traffic congestion [as discussed in Chapter 3 (Section 3.1) of the FEIS]. Construction impacts on traffic will continue to be analyzed after the publication of the FEIS. Any necessary mitigation for traffic impacts during construction in Vancouver will be coordinated with City staff.

Access for bicyclists and pedestrians across the Columbia River and North Portland Harbor will be maintained throughout construction. Detouring these users to I-205 is not planned.

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L-012-031				impacts. (To meet project policy.)
L-012-032	3-78 & 3-79		SR 14 Interchange	This section discloses that the SR14 / I-5 interchange will be closed to downtown Vancouver for up to 3 years during construction. That alone can hardly be considered disclosure of an impact. The section goes on to discuss where traffic will likely go to re-route, and closes by suggesting that a public information campaign should be enough to mitigate the construction impact. This section is ENTIRELY insufficient to draw any meaningful conclusion of potential impacts and necessary mitigations. This is a major access to two freeways in lower downtown Vancouver. What, specifically will be the traffic impacts from re-routing? Can Mill Plain Boulevard handle the extra traffic? Will there be measurable impacts to homes or business from additional traffic, noise, exhaust? Does closing these access points impact the viability of any existing businesses? If there are impacts, what is appropriate mitigation? Speculation about what people might do once the access is closed and how a public outreach campaign should be enough to mitigate impacts is wholly insufficient. It doesn't even pretend to present conclusion of an evaluation of impacts, let alone potential mitigations, and even potential impacts of the proposed mitigations. There are only two freeway accesses into the core of downtown Vancouver, and this 1.3 page section proposes to close one of them without evaluating the impacts. Please re-evaluate and provide the real impacts and real mitigations necessary as result of this action.
	3-78 & 3-79		SR 14 Interchange	City of Vancouver Comprehensive Plan for downtown growth and traffic circulation rely on access to SR-14 and I-5 in lower downtown. The Plan stipulates clearly the need for this access. Therefore, the City has created a Plan which assumes no net loss of access to downtown from the southern interchanges. Given the prominence of these interchange access points vis-à-vis downtown traffic circulation, any loss of access, even temporary, would significantly and adversely affect downtown access. The DEIS fails to analyze nor recommend appropriate mitigations given the magnitude, duration and thus direct impacts such a closure would have on Vancouver downtown streets.

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**L-012-031**

Efforts will be made to encourage travelers to shift to alternate modes of transportation, such as riding transit, bicycling, and walking, during construction. This could include providing simple, attractive, and convenient infrastructure and buses that would be easily accessed during construction. One example of such, could include the construction of the new bicycle and pedestrian path on the light rail bridge over North Portland Harbor that would be opened prior to the closure of the existing path on the I-5 bridge. Regardless of the efforts made, this area will still be a major construction zone and will at times be challenging to navigate through.

**L-012-032**

Between the publication of the DEIS and FEIS, CRC project staff have worked with the City of Vancouver to minimize impacts and commit to a process for finding mitigation for unavoidable effects during construction.

The closure of the SR 14 access would impact access into downtown Vancouver, though drivers would still be able to access this area via detours along Columbia Way and to the Mill Plain Boulevard interchange. The potential impacts of this and other closures are discussed in the appropriate sections of Chapter 3 of the FEIS, as are possible measure to minimize the effect of these closures on nearby communities and businesses. Not all impacts can be completely mitigated. However, construction traffic management will continue to be studied and coordinated with City staff. A discussion about the potential impact of closing Evergreen Boulevard during construction can be found in Chapter 3 (Section 3.7), Parks and Recreation, of the FEIS.

The suggested mitigation measures of separate queuing space/bike lanes for bike traffic, level non-skid crossing of steel plates, traffic calming measures within work zones, or parallel temporary facilities outside of work zones, have been added to Chapter 3 (Section 3.1) of

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L-012-032	3-78 & 3-79		SR 14 Interchange	The DEIS fails to sufficiently account for the direct impacts to traffic circulation related to the construction disruption and staging plan. In particular, the DEIS fails to address the short term and cumulative impacts of closure of the SR-14 interchange access. The DEIS does mention that the Mill Plain interchange is operating poorly in the existing and future condition, yet draws no conclusions or reference as to how closure of the SR-14 access will affect this interchange, nor how generally the affected traffic will be re-routed.
	3-79		4 <sup>th</sup> paragraph	There is one sentence in this paragraph that states <i>Evergreen Boulevard would close for 9 to 12 months while the new crossing is constructed</i> . This is the only sentence that mentions this closure. There is absolutely no discussion about the impact of this closure and the mitigations. This is a critical link from downtown Vancouver to the Historic Reserve, and one of the most popular bicycle routes in Clark County.
	3-79			DEIS failed to identify sufficient mitigation measures during construction. Construction activities on local streets should include separate queuing space/bike lanes for bike traffic and level, non-skid crossings of steel plates and traffic calming within work zones.
	3-79			DEIS failed to identify sufficient mitigation measures during construction. Construction activities on local streets should include separate queuing space/bike lanes for bike traffic and level non-skid crossings of steel plates and traffic calming within work zones.
	3-80	Temporary Effects: Pedestrians & Bicyclists	Next to last paragraph, 3 <sup>rd</sup> line	DEIS failed to sufficiently address known or expected impacts. This effect will be greater than described as <i>slightly</i> .
	3-80	Temporary Effects: Pedestrians & Bicyclists	1 <sup>st</sup> paragraph under this heading	DEIS failed to disclose known impacts and identify a sufficient mitigation response. Impact of HCT construction on bike and peds would be very great as intersections are closed for construction or traffic congestion impacts bikeway capacity or pedestrian crossing cycle lengths and safety.
	3-80	Temporary Effects:	Next to last	DEIS failed to suggest reasonable/sufficient mitigation measure to known

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the FEIS. The City of Vancouver is ultimately responsible for approving traffic control plans for the project during construction and will have the authority to require such mitigation.

Bicyclists and pedestrians may be required to use the bicycle and pedestrian path on the northbound I-5 structure during later phases of construction before the path on the new bridge is open. Mitigation for the closure of the path on the southbound bridge, and potential increased bicycle and pedestrian traffic on the path on the northbound bridge, will be determined during the traffic control planning process. Bicycle and pedestrian access to Hayden Island will be maintained throughout construction.

The use of the Confluence Land Bridge as an official detour route is not expected to occur, although bicyclists and/or pedestrians may choose to use this route to avoid the construction zone. No 4(f) use would be expected from added bicyclists and walkers on this facility.

As mentioned above, specific mitigation for closures to bicycles and pedestrian access will be determined during the development of the traffic control plans.

A separate section discussing bicycle and pedestrian performance during construction has not been added to the FEIS. What information is currently available is included in Chapter 3 (Section 3.1) of the FEIS.

As appropriate, this FEIS provides more detail about mitigation measures specific for certain temporary impacts. These are discussed in each section of Chapter 3. These mitigation measures will continue to be developed and refined and will ultimately be committed to in the Federal Record of Decision.

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L-012-032		Pedestrians & Bicyclists	paragraph	impact. The closure of one side of the bridge path during construction is not acceptable during peak periods unless there is more capacity added – the current growth in bridge use will not allow this to be done and successfully meet other project policy goals. The bridge traffic on the path is very much higher than during the last long-term path closure. If unavoidable, discuss mitigations (shuttle bus or ferry, fare-free transport, non-peak hour openings when shuttle or transit is closed).
	3-80 to 3-81		Temporary Effects: Pedestrians & Bicyclists	This section is very confusing, and doesn't really appear to address key issues. Closing bike and pedestrian access off to any area, or requiring any significant detour for any length of time is a very big impact for those that are dependent on those routes for transportation. The brief discussion of the potential to completely close a pedestrian and bicycle access to Hayden Island for 13 months is deficient—it does not address the user groups that would be impacted, how they would be impacted, nor how those impacts would be mitigated. The same may be said for the proposal to use the Confluence Land Bridge as a detour route. The Old Apple Tree Park and Confluence Land Bridge are 4(f) resources, so some additional discussion of the impacts of the discussed detour route must be addressed.
	3-80 to 3-81		Temporary Effects: Pedestrians & Bicyclists	The DEIS failed to propose a sufficient or clear mitigation plan for the expected impacts. There is no analysis of the impacts to bicycle and pedestrians with the closed and under construction roadways such as Evergreen Blvd, Mill Plain interchange 39 <sup>th</sup> Street, etc. This is not included in the Temporary Effects anywhere. Impacts to bicycle and pedestrians can be a significant safety hazard due to roadway surface disturbances such as holes, gravel, grotes or by forcing out-of-way travel on roadways less suitable for bicyclists and pedestrians. Because this project will be built after the adoption of the Public Right of Way Guidelines, ADA law will require that all construction impacting pedestrian routes have an accessible route provided. There is no discussion of this and how this will be addressed.
	3-81	Temporary Effects: Pedestrians &	3 <sup>rd</sup> paragraph	DEIS failed to suggest reasonable/sufficient mitigation measures to known impacts. Need to mention mitigations for bike and ped access at 29 <sup>th</sup> , 33 <sup>rd</sup>



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L-012-032		Bicyclists		and Evergreen I-5 crossings are closed – especially if the closures are concurrent. These crossings are currently very important for area access across I-5 for vulnerable/novice road users due to their low speed and low volume traffic (low freight traffic too) operations vs. 4 <sup>th</sup> Plain, Mill Plain, and 39 <sup>th</sup> St.
	3-81	Temporary Effects: Construction Safety	After 4 <sup>th</sup> paragraph	Add new paragraph sections to hold <u>Bike/Ped Mitigations</u> and <u>Temporary Effects: Bike and Ped Performance</u> – similar to how transit discussion was treated.
	3-82	Temporary Effects: Construction Safety	2 <sup>nd</sup> paragraph	Mention should be made that bike access parallel to the work zones should be provided where convenient and effective – if bike lanes cannot be established within a work zone.
	3-83	Potential Mitigation Measures	Last paragraph	The DEIS failed to proposed a sufficient or clear mitigation plan for the expected impacts. This paragraph discusses a public outreach campaign and the possibility of the project helping a transportation management association. In fact, this description is much too vague to be of any use in determining whether or not the proposed mitigation would come anywhere close to mitigating the impact of a 2-3 year direct construction impact, along with street closures, detours, noise, dust, and other construction-related impacts. These impacts are potentially great on the economic viability of many downtown businesses, yet the section does not really address those impacts at all. Likewise, there is no strategy even mentioned for how to mitigate impact for downtown residents that will live amidst the construction for several years. In short, this section must move beyond broad statement about what the project <i>could</i> do, and detail, specifically, what the impacts of the project <i>will</i> be, and how EACH potential impact can be mitigated with enough specificity that the City can respond intelligently as to the adequacy and the merits of each proposed alternative.
	3-85		Exh 3.1-53	The DEIS failed to proposed a sufficient or clear mitigation plan for the expected impacts. This table presents a laundry list of potential mitigation measures, but provides little concrete direction on how they would be implemented, or if implementing them would have significant

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L-012-032				environmental consequences. Additionally, some of the proposed mitigation measures are either moot or suggest an outcome contrary to current city policy. More disturbing is that while they purport to be strategies to mitigate potential impacts of the MOS alternatives, there is simply no way to evaluate their potential effectiveness as mitigation measures because detailed implementations of the MOS alternatives with associated park and rides were not evaluated at an appropriate level of detail. We don't know, for example, how the traffic will circulate, how great the congestion, noise, air quality, or land use or economic development impacts would be of locating the MOS park and rides in the contemplated locations. This section needs to be re-written once the appropriate level of analysis has been completed to identify the real potential impacts of the alternatives under consideration, and it must include consideration of the potential environmental consequences of the potential mitigation strategies.
<i>3.2: Aviation &amp; Navigation</i>				
L-012-033	3-91	Alternative 1: No-Build	1 <sup>st</sup> paragraph	Pearson Field is not only surrounded by the Vancouver National Historic Reserve, it is a NRHP resource in its own right. This listing affects potential changes at the airport more than surrounding uses.
<i>3.3: Property Acquisitions &amp; Displacements</i>				
L-012-034	3-100 to 3-101	3.3.2, Long-Term Effects		This section discusses potential property displacements of each alternative. Lacking in this section is an analysis, not of the specific impact to each property, but the cumulative effect, if any, to the subarea in which the properties are located. Will it change the area's character? How? Identification of specific properties is a good start, but the EIS needs to take the next step and actually identify what the long-term neighborhood impacts are from the aggregated impacts of all acquisitions.
L-012-035	3-118	3.3.5, Potential Mitigation Measures	1 <sup>st</sup> paragraph	This paragraph should make it clear that avoiding impacts is the first preference.
L-012-036	3-119	3.3.5, Potential Mitigation Measures		See comment concerning pages 3-100 to 3-101. This is the same issue: There is no discussion of the potential effect on neighborhood character

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**L-012-033**

You are correct, that the airfield is part of the VNHR. This has been clarified in Chapter 3 (Section 3.2) of the FEIS.

**L-012-034**

We have addressed these impacts within the technical reports for neighborhoods, economics, and land use, and summarized them in the respective section of Chapter 3 of the FEIS. We have not found that the very few and very small property impacts in Washington are likely to have long-term adverse impacts to neighborhoods, land use plans, or the regional economy.

**L-012-035**

The mitigation section of Chapter 3 (Section 3.3) of the FEIS states that where property acquisition and residential or business displacements are unavoidable, the project will provide mitigation.

**L-012-036**

As stated in the response to the referenced questions, these analyses are found in the neighborhoods sections of the DEIS and FEIS (Section 3.5 of Chapter 3), and within the Neighborhoods Technical Report.

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L-012-036				from the cumulative impact of all property acquisitions.
<i>3.4: Land Use &amp; Economic Activity</i>				
L-012-037	3-124	3.4.1, Adopted Plans	Local - Washington	<ul style="list-style-type: none"> <li>▪ 5<sup>th</sup> bullet – The VCCV was adopted in 2007 (delete 2004).</li> <li>▪ 7<sup>th</sup> bullet should read: <i>Vancouver-Clark Parks &amp; Recreation Dept., 2004, Paths &amp; Trails Master Plan.</i></li> <li>▪ 8<sup>th</sup> bullet – The Central Park Plan was adopted 2008 (delete 2007)</li> </ul>
L-012-038	3-127 to 131	3.4.2, Long-Term Effects	Discussion, but especially tables 3.4.5, 3.4.6, and 3.4.7	The No-Build alternative is not consistent with the Vancouver Comprehensive Plan or its components, the VCCV, Central Park Plan and Transportation System Plan. All of the build alternatives are consistent. The analysis in the DEIS and/or the Land Use technical support does not document/support a finding that any one alternative is more consistent than the others. The tables should simply read "consistent" or the supporting analysis should be provided.
	3-127	3.4.2	1 <sup>st</sup> paragraph	The following additional land use and economic effect should be analyzed under the long-term effects of each alternative: <ul style="list-style-type: none"> <li>• <u>Direct Land use and economic effects from the additional physical size/width of the bridge, freeway and freeway intersections</u></li> </ul>
	3-127	3.4.2		There is no discussion of cumulative long-term impacts. This is critical because the adopted comprehensive land use plan for Vancouver has a wide variety of elements (housing, community development, economic development, transportation, schools, parks, etc.) that all tie to a common vision of Vancouver's future. This project will have impacts ranging from property acquisition, to accessibility, to traffic, to aesthetics, to construction impacts, to shadows from the bridge, to traffic levels, and sound... Together, cumulatively, these impacts may threaten the careful balance of planned community development that is represented in Vancouver's comprehensive plan. Each sound wall may not individually have much of an effect, but the combined impact of all of them, along with the sheer mass of the river crossing structure, may make it very unlikely that Vancouver ever achieves its integrated plan of community development. The EIS must

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**L-012-037**

Thank you for the correction. We have updated these adoption dates in both the FEIS and in relevant Technical Reports.

**L-012-038**

We have amended the table comparing the alternatives. We now show all of the alternatives, except for the No-build, as being "consistent." The FEIS and its technical report appendices document the different plans that call for the CRC project. The extension of light rail, investment in freight mobility and highway safety, and minimal acquisition of additional right of way are based on direction found in the adopted plans, such as Vancouver's Comprehensive Plan. Though certain impacts are adverse and unavoidable, the project as a whole has been determined to be critically important to Vancouver, and its integrated plan of community development.

The FEIS includes discussions of indirect effects and cumulative effects. These sections have been revised since the DEIS. The project has also taken an integrated approach to mitigating certain groups of impacts. The land use pattern, form of urban development, and mix of uses is not adversely affected by the widened facility. Very little widening of the Interstate right of way is required. The widened facility does have visual, historic, and traffic impacts, but does not separate the actual land uses more than the existing divide that runs through the City. In fact, the southern extension of Main Street is a good example of the project's restoration of the early City street grid and resulting increases in connectivity.

Land use planning and the attainment of plan goals requires, as you have stated, a cumulative understanding of impacts. We have worked together with the National Park Service, the Vancouver National Historic Reserve Trust and yourselves to find a solution to the narrow passage between the Riverwest project, House of Providence (Academy) and the

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L-012-038				identify the cumulative impacts of all of the individual potential impacts (along with their individually proposed mitigation measures) and present some credible findings on the real impact to Vancouver, the Columbia River Waterfront, the Vancouver Historic Reserve, Fort Vancouver, and other Vancouver neighborhoods. This EIS fails to tie these impacts together and is therefore deficient on its face.
	3-128	3.4.2	2 <sup>nd</sup> paragraph	Failed to identify impact. A larger capacity freeway, intersections and bridge will negatively affect the City Center by severely dividing west and east Vancouver. This should be identified as a direct negative impact to be mitigated.
L-012-039	3-128	3.4.2, Alternative 2	4 <sup>th</sup> paragraph	Add: <u>A BRT system will impact commercial and high density residential downtown land uses and economic activity negatively compared to LRT. Because of the lower capacity of BRT vehicles vs LRT trains many buses will be needed to carry the same capacity as only one LRT train. These buses will stack from block to block and create an undesirable congested environment for priority users of the downtown (shoppers, business and commerce and urban residents living downtown).</u>
	3-129	3.4.2, Alternative 3	Top paragraph	LRT alternative would create less congestion with only one train every so often vs. many buses that tend to stack up during peak hours (even with staggered schedules).
	3-129	3.4.2, Alternative 4		Add: <u>A BRT system will impact commercial and high density residential downtown land uses and economic activity negatively compared to LRT. Because of the lower capacity of BRT vehicles vs LRT trains many buses will be needed to carry the same capacity as only one LRT train. These buses will stack from block to block and create an undesirable congested environment for priority users of the downtown (shoppers, business and commerce and urban residents living downtown).</u>
	3-130	3.4.2, Alternative 5	1 <sup>st</sup> paragraph	LRT alternative would create less congestion with only one train every so often vs. many buses that tend to stack up during peak hours (even with staggered schedules).

old Post Hospital, as well as other important uses on both sides of I-5. The solution is meant to address the complexities of visual impacts, noise impacts, land use connectivity, and historic impacts. The Community Connector represents the City and the project's collective attempt to come up with creative solutions.

#### L-012-039

The Land Use and Economic Activity section of the FEIS [Chapter 3 (Section 3.4)] is updated to represent the LPA which includes only light rail and not bus rapid transit. Therefore, the comments comparing the economic impacts of BRT versus LRT are not relevant to the FEIS.

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CHAPTER	PAGE	SECTION	LINE	COMMENT
L-012-040	3-130	3.4.3	1 <sup>st</sup> paragraph	<p>Failure to identify impacts of the freeway design, particularly the size/width and increased size of intersections. The proposed freeway size will have significant impacts on the land use and economic activities of the City of Vancouver. Include within this section a discussion on the impacts of freeway width and increased lanes at intersections.</p> <p>ADD: <u>The increased width and capacity of the proposed freeway will negatively impact the success of the land uses and economic activity in downtown Vancouver on the Westside of I-5 and Vancouver's significant urban civic resources of Central Park, especially the Historic Reserve, on the eastside of I-5. The success of the Downtown land uses and economic activities and the Historic Reserve land uses and economic activities are inextricably tied to one another and to the quality and quantity of multimodal connections, and especially pedestrian connections with a walkable quality ambience, cohesive connectivity and thriving intimate urban spaces.</u></p>
	3-134	3.4.3	1 <sup>st</sup> line	<p>The EIS here states that <i>Overall, the CRC project would comply with the direction of the Vancouver Comprehensive Plan...</i> However, to the extent that the project in any way makes it significantly more difficult to achieve adopted plans, the impact would be inconsistent with the adopted comprehensive plan. For example, the 7<sup>th</sup> Street Heritage pedestrian crossing connecting downtown Vancouver with the Historic Reserve is included in the City's plan. If the CRC project is constructed as planned and does not include that connection at the time of construction, it will be virtually impossible to build in the future because of the increased freeway width, and the need to design around structural elements to support the Heritage Bridge structure. To the extent the project precludes such connections (and this is just one example) it would be INCONSISTENT with Vancouver's adopted Comprehensive Land Use Plan.</p>
	3-134	3.4.3	4 <sup>th</sup> paragraph (discussing	<p>This discussion is inadequate. 6<sup>th</sup> Street is a planned freeway access point; is one of only two uninterrupted east-west roadways in south downtown.</p>

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**L-012-040**

We have addressed the impacts associated with the wider facility throughout the FEIS, and in responses to your other comments. The increased access, reduced congestion, and the introduction of light rail will overwhelmingly benefit the downtown land uses and businesses.

The LPA will not close 6th Street at Washington. The intersection of 6th and Washington will be open for east-west traffic to cross. Southbound traffic will be forced to turn right. No northbound traffic will be permitted on Washington between 5th and 6th Street.

The LPA, as compared to the existing bridge, would reduce the trip distance as measured from Esther Short Park to Delta Park, from 2.25 miles to 2.20 miles. The maximum grade on the existing facility is 4.73%. The maximum grade on the new facility would be about 3.0% - quite a bit less. To accommodate the higher elevation of the bridge deck, the pathway would have a loop ramp in Vancouver that would rise at about 4.75% to meet the covered pathway on the bridge.

In addition to the improvements noted above, the new bike and pedestrian facilities will require the crossing of no signalized intersections. There will be room for two bikes to pass each other. The pathway will be covered from the elements over half its length.

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L-012-040			the closure of 6 <sup>th</sup> Street)	Vancouver; is the sole entrance to an 800+ space city-owned parking facility under Vancouver Center; and is the roadway fronting on the downtown Hilton Hotel and Conference Center and Esther Short Park. The document says closing 6 <sup>th</sup> "...could negatively affect the economic vitality of several businesses...". As described above, the real potential impacts from this closure are not disclosed here.
	3-134	3.4.3	4 <sup>th</sup> paragraph (discussing the closure of 6 <sup>th</sup> Street)	DEIS failed to evaluate and recommend sufficient mitigation to known impact. Closure of 6 <sup>th</sup> Street and Washington would negatively affect bike and ped access to area businesses and to street network leading to bridge.
	3-134	3.4.3	5 <sup>th</sup> paragraph	DEIS failed to address known impact of project action. The raised bridge height and length would negatively affect access by bikes and peds requiring greater energy to expend and potentially longer out-of-direction travel to reach local destinations along shorelines.
	3-134	3.4.3	Under <i>Induced Growth</i>	Note that urban infrastructure in the heart of an urban area may not only induce growth on the urban periphery (depending on the regulatory framework), but may also foster significant densification of the urban core.
L-012-041	3-138	3.4.3	Plan Consistency, 3 <sup>rd</sup> paragraph	The VCCV does not specify LRT as the preferred mode of HCT. It should not be listed in this sentence, but in the paragraph above with the Vancouver Comprehensive Plan.
L-012-042	3-138	3.4.3	<i>Induced Growth</i> - effects of transit	The discussion here does not address impacts to non-station area blocks, or impacts to individual business owners in the vicinity of station blocks and non-station blocks.
	3-139	3.4.3	Top paragraph	<u>Add: A BRT system will impact the commercial and high density residential downtown land uses and economic activity negatively. Because of the lower capacity of BRT vehicles vs LRT trains many buses will be needed to carry the same capacity as only one LRT train. These buses will stack from block to block and create an undesirable congested environment for priority users of the downtown (shoppers, business and commerce and urban residents.</u>

**L-012-041**

The reference to the VCCV specifying light rail as the preferred method of high capacity transit has been removed from the FEIS.

**L-012-042**

The alternatives with BRT have been dropped from further analysis, consistent with the selection of light rail for the Locally Preferred Alternative. The potential for changes in land use and economic conditions is addressed in detail in the respective technical reports, and in the indirect effects technical report. These reports are included as appendices to the FEIS.

The research suggests that light rail transit is likely to contribute to a more dense, vibrant, downtown with a mix of uses, and a reduced reliance on the automobile. This analysis does not provide parcel-by-parcel speculation of land use impacts.

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				<u>living downtown).</u>
L-012-042	3-143	3.4.3	Exh 3.4-19	Please include similar analysis of bike catchment areas and effects in reaching future LRT stations (to help provide ridership in order to avoid slower bus transfer trips).
	3-144	3.4.3	Exh 3.4-20	Please include similar analysis of bike catchment areas and effects in reaching future LRT stations (to help provide ridership in order to avoid slower bus transfer trips).
	3-145	3.4.3	2 <sup>nd</sup> paragraph	This section suggests that the project may replace on-street parking spaces for various alignment alternatives; and this same strategy is mentioned in several other locations within the document. Instead, there should be no net loss of parking in any part of Vancouver as a result of this project. Parking capacity in Vancouver is a resource here to serve today's residents and businesses, and to provide to growth in the future. The project cannot take these resources without replacing them without impacting Vancouver's ability to achieve its growth plans as adopted in the Comprehensive Plan and the Vancouver City Center Vision Plan.
	3-145	3.4.3	3rd paragraph	Challenge statement: There should be greater opportunity for redevelopment and enhancements while keeping same on-street parking supply if couplet on Main and Broadway were used.
	3-146	3.4.4, Temporary Effects		This section addresses potential temporary effects of construction, yet fails to mention noise, traffic, dust, pavement degradation, dampening of economic activity, dampening of economic development, and other impacts.
	3-147	3.4.5, Potential Mitigation Measures		This section fails to assess the long-term cumulative impacts of all of the business displacements or disruptions that may be caused by any phase of the project.
	3-147	3.4.5, Potential Mitigation Measures		The DEIS fails to sufficiently account for the direct impacts to traffic circulation related to the construction disruption and staging plan. The DEIS fails on all accounts to sufficiently analyze the direct or cumulative impacts that such a long duration closure would have on the business environment. Omission of such analysis constitutes failure and the proposed mitigations

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CHAPTER	PAGE	SECTION	LINE	COMMENT
L-012-042				are insufficient to address the expected impacts associated.
	3-147	3.4.5	Potential Mitigation Measures	<ul style="list-style-type: none"> <li>▪ 2<sup>nd</sup> paragraph – There are no alternative ways to connect downtown with the waterfront. This is an unmitigatable impact and the DEIS should so state.</li> <li>▪ 2<sup>nd</sup> paragraph – the railroad line is BNSF not UP</li> <li>▪ 6<sup>th</sup> paragraph – the mitigation for removing on-street spaces is to provide them off-street. The existing public off-street garage was sized to accommodate proposed redevelopment, not to mitigate for removal of on-street spaces. All of the existing garage capacity is committed. There is no excess to mitigate for the impacts of lost on-street parking from transit.</li> </ul>
	3-147	3.4.5	Potential Mitigation Measures	<p><u>Add: Potential Mitigation for the increased freeway width</u></p> <ul style="list-style-type: none"> <li>▪ An enlarged lid at Evergreen Blvd that includes park/open space. Street trees on Evergreen Blvd with a large wide canopy and 12' or wider sidewalks.</li> <li>▪ The 7<sup>th</sup> Street pedestrian crossing as listed in the Vancouver City Center Vision Subarea Plan</li> <li>▪ An undercrossing of 5<sup>th</sup> Street – at least as a pedestrian connection – designed and landscaped as a safe, aesthetic and welcoming pedestrian connection.</li> <li>▪ The extension of Main Street to Columbia Way and the waterfront.</li> <li>▪ Finished grades within the new lands created under the new replacement bridge shall be such that a clear vista from west to east is created and accentuated and the grades shall facilitate comfortable pedestrian travel creating an obvious connection from west to east and to the waterfront.</li> <li>▪ Gateways – Mill Plain, McLoughlin and Fourth Plain intersections and underpasses along the I-5 alignment should include special plantings of small groves of tall-growing conifers, identified street trees and other plants with seasonal color in a distinctive gateway landscape; include wide 12' or greater sidewalks with 8' planting strips separating</li> </ul>



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CHAPTER	PAGE	SECTION	LINE	COMMENT
L-012-042				sidewalk from curb; and include bicycle lanes. <ul style="list-style-type: none"> <li>Plant native tall-growing conifers along the eastside of the freeway alignment in the Central Park planning area</li> <li>Souid walls</li> </ul>
<i>3.5: Neighborhoods &amp; Environmental Justice</i>				
L-012-043	3-151	3.5.1, Neighborhood Plans	5 <sup>th</sup> Bullet	Add bike parking to parking notation.
L-012-044	3-154	3.5.1	Exh 3.5-4, pg. 1 of 2	The VA Medical Center is not identified on the map.
	3-155	3.5.1	Exh 3.5-4, pg. 2 of 2	#35 is identified as the VA Medical Center in the text, but on the map #35 is Pearson Air Museum.
	3-155	3.5.1	Exh 3.5-4, pg. 2 of 2	In the text #55, Waterfront Park is identified as <i>senior/low-income</i> and should be <i>park</i> .
	3-155	3.5.1	Exh 3.5-4	Exhibit 3.5-4 Community Resources in Washington should also include: (1) St. James Catholic Church; (2) the Land Bridge; and (3) the amphitheater at the Vancouver Landing. Impacts to these resources should be included in the final report.
	3-155	3.5.1	Exh 3.5-4	Add historic sidewalks to list (90 to 100+ years old) and mention elements: contractor stamps, street names, buggy wheel guards, horse rings, etc.
L-012-045	3-160	3.5.2	Exh 3.5-6	DEIS failed to evaluate the effects of additional traffic generated by park and ride locations and the effects which would impact local schools, parks, and trail connections and impacting bike and pedestrian safety (safe routes to schools). The following specific locations where the analysis is insufficient are as follows: Lincoln Elementary School, Clark College and Hudson's Bay High School, Clark College and Marshall Center, Discovery Middle School and Burnt Bridge Creek trail.
L-012-046	3-161	3.5.2	1 <sup>st</sup> paragraph	Is gibberish
L-012-047	3-161	3.5.2	2 <sup>nd</sup> paragraph	BRT is not consistent with neighborhood action plans that call for LRT.

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**L-012-043**

We have added bike parking to the equivalent section of the FEIS.

**L-012-044**

Thank you for taking the time to submit your comments on the I-5 CRC DEIS and helping us to correct these errors.

**L-012-045**

The Traffic Technical Report that supported the DEIS did provide information regarding local traffic operations. Please refer to the same report for the FEIS, which provides additional detail.

**L-012-046**

Although the paragraph includes an error, the basic meaning is still clear, that the Wellness Project would have been displaced by the alignment of the light rail guideway terminating at the Lincoln Station. This alignment was not included in the LPA, so this text is not included in the FEIS.

**L-012-047**

That is correct. We considered general support for High Capacity Transit to include BRT. However, neighborhood plans that call specifically for light rail were not considered to be supportive of a BRT system.

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CHAPTER	PAGE	SECTION	LINE	COMMENT
L-012-047				Change wording from "not as consistent" to "not consistent"
L-012-048	3-161	3.5.2		Paragraph 4 refers to residential sound insulation as a mitigation measure for noise. Will the cost of the insulation be part of the project costs? Paragraph 5 refers to a few locations where sound walls would not be able to completely mitigate all the traffic-related noise impacts. What additional mitigation is planned for these locations? Also, what mitigation is planned for the Fort Apartments and the Normandy Apartments specifically?
L-012-049	3-163	3.5.2	Table 3.5-7	Change <i>highly consistent</i> to <i>consistent</i> since neither the DEIS or the neighborhoods tech report document gradations of consistency.
L-012-050	3-165	3.5.2		Paragraph 2 describes noise impacts to the Smith Tower in the Esther Short Neighborhood. Impacts not addressed are visual impacts and obstruction of sunlight issues at this and other locations.
L-012-051	3-170	3.5.3		Paragraph 4 mentions a security-minded design for transit stations. This is the only mention in this section of addressing public safety concerns. Long term impacts of crime rates (higher or lower) are not addressed in this section. This should be addressed here if not addressed in another section of the report.
L-012-052	3-172	3.5.3		The project should avoid displacing residences.
L-012-053	3-173	3.5.3		The DEIS has failed to identify a feasible noise and vibration mitigation plan for the neighborhood at these locations and for the impacts of the high noise wall upon the neighbors.
L-012-054	3-172 to 3-174	3.5.3	Long-term impacts of MOS decision.	This section should analyze and disclose the traffic impacts of the MOS. Some (how many?) drivers will exit I-5 at Main Street and proceed down it to the park & rides, rather than continuing to exits closer to the bridge because it is a shorter route. This will increase traffic through the neighborhoods.
L-012-055	3-177 and following	3.5.5	Potential Mitigation Measures	DEIS failed to evaluate impacts of project. No analysis of how construction and bridge (I-5 and east to west facilities) closures will address access and safety by vulnerable road users (high proportion of households without cars)

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**L-012-048**

As discussed in Chapter 3 (Section 3.11) of this FEIS, the FHWA, WSDOT, and ODOT do not provide building sound insulation for properties that are affected by traffic noise. With sound walls, the LPA Full-Build traffic noise impacts are reduced from 468 to 78. This is 192 fewer than the No-Build traffic noise impact of 270. [per reviewer comment: specifically address Fort Apartments (13th, just south of interchange) and Normandy Apartments (7th and I-5)]

**L-012-049**

We used "consistent" for BRT when the different neighborhood plans call for either High Capacity transit, good transit, or Light Rail. However, since some plans call specifically for Light Rail, we considered the options with Light Rail as being "highly consistent" with the plans.

**L-012-050**

Obstruction of sunlight at Smith Towers, and most areas within Vancouver, will change little from construction of the CRC project. Regarding aesthetics, as discussed in Chapter 3 (Section 3.9) of the FEIS, the creation of vertical concrete sound walls, more visually complex systems of interchange ramps at higher elevations, and introduction of light rail will result in aesthetic changes in Vancouver. This is true of Smith Towers, which is located near the SR 14 interchange and will be adjacent to the new light rail alignment.

**L-012-051**

The CRC project is using design strategies that have been proven to reduce the potential for crime at stations and on trains. In addition, CRC has received input from advisory groups, jurisdictions, and the public to design a system that will enhance safety and security.

Recommendations include, but are not limited to, locating stations near

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L-012-055				—especially in Vancouver's City Center. This important item has not been referenced in the text yet.
L-012-056	3-178	3.5.5	Potential Mitigation for Noise Impacts	Not addressed in this section is mitigation for nighttime construction noise. If construction is scheduled to take place during nighttime hours, there is a need to address how the noise will be mitigated in the neighborhoods. City regulations prohibit noise between the hours of 8:00 pm and 7:00 am. Nighttime noise would require a variance from the local noise ordinance.
L-012-057	3-179	3.5.5		Mitigating impacts of tolling on low-income populations is a necessity. A program should be in place from the outset of tolling. There is no analysis of the impact on low-income populations, so it is not possible to comment on mitigation.
L-012-058	3-180	3.5.5	Potential Mitigation for Temporary Effects	Add the following mitigation measure: <ul style="list-style-type: none"> <li>Seeking input from neighborhoods on unanticipated effects and working cooperatively on mitigation measures throughout the construction period.</li> </ul>
<b>3.6: Public Services &amp; Utilities</b>				
L-012-059	3-184	3.6.1	7	Revise to read, "...and water mains that cross I-5 at SE Columbia Way (6"), Fifth Street (12"), McLoughlin Boulevard (20"), Mill Plain Boulevard (18"), McLoughlin Boulevard (20"), Fifth Street, 16th Street E, 29th Street (12"), E 32nd Street (10"), 39th Street and 40th Street (24"). A major water line (20") is located parallel to the western right-of-way line of I-5 between McLoughlin Boulevard and E 16th Street. Additionally, there is a gas main along the entire length of Main Street, as well as a water main and communications tower on the WSDOT Maintenance Facility at 39th and Main.
L-012-060	3-190	3.6.3	Transit Mode, 2 <sup>nd</sup> paragraph	Substations to serve the light rail line should be located within buildings or underground.
<b>3.7: Parks &amp; Recreation</b>				
L-012-061	3-195			The EIS should address planned (future) park, trail, boating, and other recreation improvements – i.e., Gramor Development and extension of the

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residential and commercial buildings; controlling pedestrian access to stations through the strategic placement of entrances and exits, fencing, lighting, and landscaping; lighting stations so that all activity is easily visible; and designing a clear line of sight into and out of the station. A Safety and Security Management Plan (SSMP) was created, in part, to address public concerns about safety, and is a requirement for funding from the Federal Transit Administration. Safety will be designed into every phase of the project.

The CRC project is also working with the City of Vancouver and Portland police and C-TRAN and TriMet security to promote passenger safety at stations and park and ride facilities, as well as on light rail trains. Measures to increase public safety on and near light rail could include enforcing fare payment; installing closed-circuit TV at light rail stations, park and rides, and on trains; and patrolling stations and trains by transit security and local police officers. For more information about how safety and security associated with light rail is being addressed by the CRC project, see Chapter 3 (Section 3.1) of the FEIS.

#### L-012-052

The CRC project designers have worked to avoid displacing residences for the design of the LPA, but not all such displacements are avoidable. Please see Chapter 3 (Section 3.3) of the FEIS for a description of the residences that would be displaced by the LPA.

#### L-012-053

Please see FEIS Chapter 3 (Section 3.11) for an updated analysis of noise impacts and mitigation. In this chapter, the FEIS also evaluates the visual impact of noise walls in sensitive locations (Section 3.9).

#### L-012-054

This information has been provided in greater detail for the FEIS.

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L-012-061				riverfront trail – and how the project could affect those plans. The EIS should also address new opportunities for park, trail, boating and other recreation improvements which could be considered as a result of the CRC project – i.e., new area located below the bridge on the Washington side.
L-012-062	3-196 and 197	3.7.1	Exhibit 3.7-1 and Exhibit 3.7-2	The inventory of parks and trails is not complete. It omits the Discovery Trail loop that crosses the APE on Evergreen Blvd, as well as along the Columbia. (See attached section of the 2004 VCPRD Paths & Trails Master Plan describing the trail and planned improvements. In addition, see information on the VCPRD website: <a href="http://www.cityofvancouver.us/parks-recreation/parks_trails/trails/discovery_loop.htm">http://www.cityofvancouver.us/parks-recreation/parks_trails/trails/discovery_loop.htm</a> )
	3-195	3.7.1		This list includes only regional facilities. Add community and neighborhood parks to list.
	3-196	3.7.1	Ex 3.7-1	DEIS failed to disclose data, or omitted data. In map exhibit add missing north-south street in Delta Park – it's an important low-traffic bike access link to bridge and area paths.
	3-196	3.7.1	Ex 3.7-1	DEIS failed to evaluate or disclose known conditions. Check exhibit for missing path over-crossing (I-5) and under-crossing (Main Street) along I-5 north of 40 <sup>th</sup> St/Kiggins Bowl).
	3-196	3.7.1	Ex 3.7-1	The names should be Leverich Community Park, Marshall Community Center and Park
	3-198	3.7.1	Ex 3.7-2	The names of the parks are incorrect. They should be Leach Neighborhood Park, Marshall Community Center and Park, Leverich Community Park, Kiggins Sports Fields/Stadium
L-012-063	3-199	3.7.1		DEIS failed to evaluate known conditions. Large crowds walking along to I-5 Bridge eastside path during 4 <sup>th</sup> of July Fireworks. Impacts will occur to the extent this facility is out of service or altered.
	3-199	3.7.1		DEIS failed to evaluate or disclose known conditions. Add mention that the closure of Evergreen Bridge (I-5) will affect access to a special class of local arterial defined as a <i>scenic road</i> .

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**L-012-055**

As discussed in Chapter 3 (Section 3.4) of the FEIS, maintaining access for pedestrians is a key component of construction plans. This strategy includes several components, including:

- Work on short sections of affected roadways and intersections while leaving a portion open for travelers of all modes.
- When a detour becomes necessary, the project will provide a quick, well-defined detour route around construction.
- The project will also deploy flagging crews to guide pedestrians through work zones, as needed.

**L-012-056**

Please see Chapter 3 (Section 3.11) of this FEIS for a discussion of construction noise standards and mitigation, including discussion of nighttime construction noise.

**L-012-057**

As discussed in Chapter 3 (Section 3.5) of the DEIS and FEIS, tolling could impact low-income populations by introducing a new expense that could be proportionally a greater share of total income for low-income individuals, requiring that all users obtain transponders for electronic toll collection, and instituting a new tolling system that could be confusing or difficult to communicate to individuals with limited English proficiency. However, without a toll, the project likely could not be funded, or if funded, the new capacity on the bridge would be filled faster. Including a toll would reduce congestion, improve travel times, and could result in a slight improvement in air quality by reducing emissions, which would benefit all users. See Chapter 3 (Section 3.5) of the DEIS and Chapter 3 (Section 3.5) of the FEIS for a description of impacts and benefits of the project to EJ populations.

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CHAPTER	PAGE	SECTION	LINE	COMMENT
L-012-063	3-199	3.7.1		These additional events that take place in the project area should be listed: Old Apple Tree Festival, numerous events at Marshall Community Center and Park, including the Luepke Senior Center. Although these are the only recreational resources using LWCF funds, open space may have been purchased or conservation/restoration efforts undertaken using LWCF funds through similar programs including the Washington Wildlife and Recreation Program (WWRP), Clark County Conservation Futures Program.
	3-201	3.7.2	Long-Term Effects	DEIS failed to disclose or evaluate known conditions. Significant traffic impacts are expected as a result of the build actions relative to traffic on 39 <sup>th</sup> Street and the effect on bike/ped access to Burnt Bridge Creek regional trail and Discovery Middle School which is a designated <i>safe schools route</i> .
	3-201 and following	3.7.2	Long-Term Effects	Does not include the Discovery Trail loop that crosses the APE on Evergreen Blvd, as well as along the Columbia. (See attached section of the 2004 VCPRD Paths & Trails Master Plan describing the trail and planned improvements. In addition, see information on the VCPRD website: <a href="http://www.cityofvancouver.us/parks-recreation/parks_trails/trails/discovery_loop.htm">http://www.cityofvancouver.us/parks-recreation/parks_trails/trails/discovery_loop.htm</a> .)
	3-207	3.7.3	Long-Term Effects	This section should include analysis of the barrier effect of a wider freeway with more cars on it and high sound walls (10 to 18 feet) on the trail connections over it (Discovery Trail and the Seventh Street pedestrian bridge).
	3-207	3.7.3	Long-Term Effects, 1 <sup>st</sup> full paragraph	The Seventh Street pedestrian connection is very important to the urban trails network, and is included in planned pedestrian improvements in the Vancouver Comprehensive Plan. This connection should be included in the project and any alternative that precludes its development is inconsistent with City plans.
	3-208	3.7.3	Tolling Scenarios	The EIS should include an analysis of the air quality impacts of different tolling Scenarios, particularly related to trails and parks adjacent to I-5 near the tolling stations.

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**L-012-058**

We look forward to working directly with the neighborhoods and with businesses during construction. There will be robust public involvement which will include design workshops, mitigation workshops, and many other opportunities for neighborhood involvement.

**L-012-059**

This information has been included in technical reports and in the FEIS.

**L-012-060**

Substations to serve light rail will be located within buildings. Please see the section on EMF, Chapter 3 (Section 3.13) of the FEIS, for discussion of substation locations.

**L-012-061**

A discussion of the planned extension of the Waterfront Trail, as well as potential future park improvements, has been added to the FEIS. Please see Chapter 3 (Section 3.7) of the FEIS for this discussion. The city has completed conceptual plans for the waterfront, and the project will work closely with the city on the design under and near the bridge.

**L-012-062**

Missing park and recreation facilities have been added to exhibits. Additionally, park names have been corrected to match the names provided. Bicycle and pedestrian facilities in the project that are not identified as recreation trails are not included in this map, but can be found in the map of bicycle and pedestrian routes in Chapter 3 (Section 3.1) of the FEIS.

**L-012-063**

The eastside path has been closed during some past fireworks displays to prevent people from congregating on the bridge, as such, impacts to

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L-012-063	3-208	3.7.4	Temporary Effects	Does not include the Discovery Trail loop that crosses the APE on Evergreen Blvd. as well as along the Columbia. (See attached section of the 2004 VCPRD Paths & Trails Master Plan describing the trail and planned improvements. In addition, see information on the VCPRD website: <a href="http://www.cityofvancouver.us/parks-recreation/parks_trails/trails/discovery_loop.htm">http://www.cityofvancouver.us/parks-recreation/parks_trails/trails/discovery_loop.htm</a> .)
	3-208	3.7.4	Temporary Effects	The EIS should include an analysis of the air quality impacts of construction, particularly on users of trails and recreation facilities adjacent to the project and provide mitigation for any impacts.
	3-210	3.7.5	Potential Mitigation Measures	Does not include the Discovery Trail loop that crosses the APE on Evergreen Blvd. as well as along the Columbia. (See attached section of the 2004 VCPRD Paths & Trails Master Plan describing the trail and planned improvements. In addition, see information on the VCPRD website: <a href="http://www.cityofvancouver.us/parks-recreation/parks_trails/trails/discovery_loop.htm">http://www.cityofvancouver.us/parks-recreation/parks_trails/trails/discovery_loop.htm</a> .)
	3-210	3.7.5	Potential Mitigation Measures	Construction of a lid over the new freeway from Evergreen Blvd south as far as possible should be included as mitigation for the adverse impacts to the Discovery Trail and degraded pedestrian linkage between downtown and the VNHR.
<b>3.8: Historic &amp; Archaeological Resources</b>				
L-012-064	3-240	3.8.3	2 <sup>nd</sup> paragraph	This section should include the negative impacts of the proposed sound wall (16 feet high, located less than 10 feet from the west side of the Post Hospital) on the setting and use of the building (light and air to the first floor and basement would be restricted by the wall). At the least, the last sentence should be changed to read: <i>However, these benefits would be offset if the sound walls alter the historic setting or compromise the use of the buildings adjacent to the wall as seems likely.</i>
	3-252	3.8.5	Potential Mitigation Measures	Second bullet – Stabilization of the Barracks Post Hospital should be listed as mitigation for project effects, not as assistance with restoration efforts. If no restoration were planned, stabilization would be necessary prior to

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event participants or the event itself is speculative. Evergreen Boulevard has been described as a scenic road in Chapter 3 (Section 3.7) of the FEIS.

Only recreational events that draw large numbers of residents from Portland or North Clark County are listed in this section. Old Apple Tree Park, Marshall Community Center, and Luepke Senior Center have not been identified as having received LWCF, though parks that received other federal or state funding have been identified in Chapter 3 (Section 3.7) of the FEIS.

The LPA full-build of the SR-500 interchange is expected to reduce the number of vehicles traveling over the 39th Street overpass compared to No-Build. This reduction of vehicular traffic, in combination with the bicycle and pedestrian improvements provided by the project along 39th Street, would result in improved conditions for users accessing Leverich Community Park and Discovery Middle School. For more information about these proposed improvements, please see Chapter 3 (Section 3.1) of the FEIS.

As mentioned in responses to previous comments, the Discovery Historic Loop Trail has been added to the analysis of impacts to park and recreation resources. A discussion of this trail can be found in Chapter 3 (Section 3.7) of the FEIS.

The I-5 improvements included as part of the CRC project are not expected to permanently affect the existing or planned trail connections across I-5. The construction of sound walls along the Vancouver National Historic Reserve, though they may be justified, would not be constructed unless the local jurisdiction approves of this mitigation.

Tolling the I-5 bridge will be done electronically and will therefore not require the toll booths that could result in traffic congestion and impacts

City of Vancouver				
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CHAPTER	PAGE	SECTION	LINE	COMMENT
L-012-064				construction in order to ensure that the building is not damaged by the project.
	3-252	3.8.5	Potential Mitigation Measures	Sound walls as high as 16 feet are contemplated as mitigation. However, the VMC allows sound walls only up to 12' high and only when certain conditions are met. A variance would be needed to construct sound walls higher than 12'. If approved, additional mitigation for the impacts of such extraordinarily high sound walls would be necessary. If not, additional mitigation for the noise impacts of the project would be necessary. In any case, mitigation for the impacts of the sound walls alone, no matter how high, will be necessary.
<b>3.9: Visual &amp; Aesthetic Qualities</b>				
L-012-065	3-259	3.9.1, Greater Central Park Landscape Unit	3 <sup>rd</sup> paragraph, second to last sentence	Views from I-5 to VNHR and downtown are NOT currently obstructed by berms, sound walls or retaining walls. The Post Hospital and the Academy are landmarks visible from I-5 indicating that you have arrived in historic downtown Vancouver.
	3-259	3.9.1, Burnt Bridge Creek Landscape Unit	5 <sup>th</sup> paragraph, last sentence	As you cross Burnt Bridge Creek, the roadway is higher than the vegetation and the traveler can clearly see the creek valley.
	3-260 and following	3.9.2	Long-Term Effects	This section does not include the impacts of proposed mitigation measures, as required. Views from I-5 to downtown and the VNHR, as well as views from downtown to VNHR and vice versa would be adversely affected by construction of sound walls (proposed at 10 to 18 feet high). Where there are currently no walls, the highway will be twice as many lanes, landscaping will be eliminated through downtown and replaced by high sound walls, heightening the barrier effect of the freeway.
	3-261	3.9.2	Exh. 3.9-8	The description of potential impacts on the Vancouver Downtown Landscape Unit and the Central Park Landscape Unit should disclose the visual impact of proposed sound walls
L-012-066	3-261	3.9.2, Long-Term Effects	Alternative 3	Substations to serve the light rail line should be located within buildings or underground.

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to air quality.

Potential construction-related effects to parks are included in Chapter 3 (Section 3.7) of the FEIS. Potential mitigation measures for construction-related air quality impacts are also included in Chapter 3 (Section 3.10).

The Evergreen Community Connector has been incorporated as part of the CRC project and will enhance nearby parks and the pedestrian experience.

#### L-012-064

Potential noise and vibration impacts that would result from the CRC project were disclosed in the Chapter 3 (Section 3.11) of the DEIS, and have been updated in Chapter 3 (Section 3.11) of the FEIS. Chapter 3 (Sections 3.8 and 3.9) also discussed the aesthetic impacts of noise walls.

The FHWA, with input from the DOT's, set the traffic noise abatement criteria for highway noise, which are implemented by the state DOT's. Noise walls, to the extent that they are effective at reducing noise and can be constructed at a reasonable cost, are the most common type of mitigation for highway noise when project related noise levels exceed the abatement criteria. The DEIS proposed potential locations for new or replacement noise walls that were preliminarily considered reasonable and feasible by state criteria. Information on the noise walls used to mitigate project related highway noise impacts can be found in the DEIS (pages 3-301 through 3-305). The analysis performed for the FEIS is based on more refined designs and updated traffic modeling (Chapter 3 Section 3.11). Though the exact noise mitigation designs will be based on negotiations and discussions with the immediately adjacent property owners, there are some preliminary dimensions recommended in the FEIS and the Noise and Vibration Technical Report.

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CHAPTER	PAGE	SECTION	LINE	COMMENT
L-012-067	3-261	3.9.2	Transit Views	Because many more buses would be running with BRT, buses would be constantly in view (and making a lot of noise) changing the view and experience of the streets that they would run on.
	3-261 to 264	3.9.2	Exh. 3.9-9, 3.9-10, and 3.9-11	These exhibits do not include the impacts of proposed mitigation measures, as required. Views from I-5 to downtown and the VNHR, as well as views from downtown to VNHR and vice versa would be adversely affected by construction of sound walls (proposed at 10 to 18 feet high). Where there are currently no walls, the highway will be twice as many lanes, landscaping will be eliminated and replaced by high sound walls, heightening the barrier effect of the freeway.
	3-263	Alternative 4	Exh 3.9-10	The visual effects summary table breaks the Vancouver downtown core from the Columbia River Waterfront and from the Greater Central Park Landscape, yet they are all part of the same <i>environment</i> . It is not appropriate simply to evaluate each one independently and conclude that there is no significant impact. The real impact comes with the cumulative impacts to each of the locations, such that the fundamental character of the areas that make up Vancouver's core is changed by the cumulative impacts of the project—and the proposed project mitigations. In large part, Vancouver is building its economic development model and revival around the themes of its important role in the region's historical development. The EIS should present an evaluation of the complete effect of project implementation for each alternative, in the context of Vancouver's adopted plans and policies to determine what the real project impacts are. Independent assessment of individual landscape units or property acquisitions does little to disclose information on this more important question.
L-012-068	3-263 to 264	3.9.2, Long-Term Effects	Alternative 5	Substations to serve the light rail line should be located within buildings or underground.
L-012-069	3-264 to 267	3.9.3	Long-Term Effects of Bridge	One beneficial impact of the replacement bridge option is that it could result in re-establishing the visual connection from downtown to the Columbia River and along the north shoreline from east to west where it is currently

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As described in the DEIS, the FTA has also developed impact criteria for acceptable levels of ground-borne vibration. Light rail operations could result in some vibration impacts, which could be mitigated by installing vibration isolation between the rails and ground. This too has been updated for the FEIS in Chapter 3 (Section 3.11).

Lastly, the project has been working with property owners, vibration specialists, and contractors to assess the potential for vibration related impacts to historic structures. Specifically, the Clark County Historic Museum and the Post Hospital have been considered; and an approach has been developed to address the potential for impacts. Projects which had greater potential to cause vibration impacts than those projected for these sites have been successful in monitoring construction and incorporating vibration dampening elements in the light rail guideways and light rail vehicles.

The numerous, similar construction and operation impacts that have been managed in the region have provided many lessons in vibration estimating, management, and monitoring. Tunnel construction planned for the Alaska Way Viaduct, and which was used for previous extension of the MAX system in Portland, have both generated far higher levels of vibration impacts than those that are projected at the Post Hospital. These projects have not found it necessary to reinforce or modify historic structures prior to construction. These projects have made commitments, as will the CRC, that the buildings will be monitored, and if necessary restored to pre-construction condition.

#### L-012-065

Thank you for the suggestions. The FEIS and the revised Visual and Aesthetics Technical Report has been amended based on your input. The project team understands the potential visual impacts associated with sound and retaining walls. The updated Technical Report discusses this in some detail.



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CHAPTER	PAGE	SECTION	LINE	COMMENT
L-012-069			Replacement	obstructed by the bridge. This benefit would not occur with the supplemental bridge.
	3-267 to 268	3.9.3	Long-Term Effects	The description of potential impacts on the Vancouver Downtown Landscape Unit and the Central Park Landscape Unit should disclose the visual impact of proposed sound walls.
L-012-070	3-266		Exh 3.9-13	DEIS failed to evaluate or disclose known conditions. In exhibit 3.9-13 the ped and bike facility is missing.
	3-267		Exh 3.9-14	DEIS failed to evaluate or disclose known conditions. In exhibit 3.9-14 the ped and bike facility is missing.
L-012-071	3-269	3.9.3, Long-Term Effects	4 <sup>th</sup> paragraph	DEIS failed to evaluate or disclose known conditions. The installation of LRT guideway with on-street parking will not allow the planned addition of bike lanes along upper Main Street (from Fourth Plain to the north). See CoV TSP Bike Framework Plan. <a href="http://www.cityofvancouver.us/upload/contents/500/bjevsejemap.pdf">http://www.cityofvancouver.us/upload/contents/500/bjevsejemap.pdf</a>
	3-269	3.9.3, Long-Term Effects	4 <sup>th</sup> paragraph	DEIS failed to evaluate or disclose known conditions. There is no discussion or exhibits of how any proposed HCT lane configurations affect bike access east to west across the affected intersections – especially if parking, multiple/additional turn lanes or station areas are added. See CoV TSP Bike Framework Plan. <a href="http://www.cityofvancouver.us/upload/contents/500/bjevsejemap.pdf">http://www.cityofvancouver.us/upload/contents/500/bjevsejemap.pdf</a>
L-012-072	3-271	3.9.3, Two-way Broadway or Broadway-Main Couplet	1 <sup>st</sup> paragraph	DEIS failed to sufficiently analyze expected visual and aesthetics impacts to City streets and neighborhoods. The following conclusion is written in error <i>...no substantial difference in visual effects between the two-way Broadway and Broadway-Main couplet alignment options.</i> Parking will be affected and the single-track option will make the LRT track way less dominant within a narrow right-of-way. (Much as is currently used in Old Town/Chinatown, 5 <sup>th</sup> and 6 <sup>th</sup> Avenues alignment.). Insufficient resolution of the aesthetic impact is proposed.
L-012-073	3-272	3.9.5	Potential Mitigation	Add the following mitigation measures: <ul style="list-style-type: none"> <li>Substations to serve the light rail line should be located within</li> </ul>

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**L-012-066**

Please see the response to comment L-012-060.

**L-012-067**

Thank you for taking the time to submit your comments on the I-5 CRC DEIS. We have disclosed numerous potential project impacts. These have been assessed for the local plan, political, economic, and historic context. The project team has worked closely with the City of Vancouver. We have become very familiar with City zoning, economic development opportunities, pending development, historic properties, and the adopted neighborhood, subarea, and other plans.

The project impacts have been described in detail, organized by technical discipline and geography. These reports have also been synthesized in the cumulative impacts analysis, for the MOA on historic properties, etc.

For your concerns regarding noise walls, please refer to the updated Visual and Aesthetics Technical Report and Sections 3.8 and 3.9 of the FEIS. We also address this concern in our response to comments L-012-064 and L-012-065.

**L-012-068**

Please see the response to comment L-012-060.

**L-012-069**

The revised Visual and Aesthetic Technical Report and the FEIS describe the potential benefits of the waterfront underneath the I-5 landing in Vancouver, and addresses the sound walls and the visual impacts of such.

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CHAPTER	PAGE	SECTION	LINE	COMMENT
L-012-073			Measures	<u>buildings or underground.</u>
L-012-074				<ul style="list-style-type: none"> <li>Adopt UDAG recommendations as mitigation for visual impacts.</li> </ul>
<b>3.10: Air Quality</b>				
L-012-075	3-273	3.10		Please address air quality impact on bike and ped traffic for each bridge scenario – especially given the distances bike and peds will be away from automotive and BRT traffic.
L-012-076	3-280 to 3-281	3.10.2		There is a complete failure to analyze the impacts of the park and ride facilities proposed for lower downtown, the Mill Plain District, Clark College, and Lincoln. Detailed air quality analysis would include all local traffic circulation, plus that added for ingress/egress to the park and ride lots and stations, and the impact of buses on congestion, traffic circulation, and emissions. This evaluation is completely lacking and renders this section insufficient to identify and evaluate the potential impacts of the proposed alternatives.
<b>3.11: Noise &amp; Vibration</b>				
L-012-077	3-287	3.11		DEIS failed to evaluate known conditions. Failed to assess the noise impact on bike and ped traffic for each bridge and HCT scenario – especially given the distances bike and peds will be away from automotive and HCT lanes. Investigate track sections with sharper curves and with and without track lubricators.
L-012-078	3-287	3.11		DEIS failed to evaluate known impacts of implementing proposed mitigation. No analysis of affect on noise in the areas surrounding the BIA if sound walls are installed and sound bounces off new sound walls.
	3-290 to 291	3.11.1, What are City Noise Standards?	Paragraph 2	This is correct except for the assertion that the City of Vancouver's noise standards do not apply to public streets and sidewalks. What does this mean? Please clarify. The noise from normal vehicle use of public streets regulated under WAC 173-62 is exempt, but sidewalks are not.
	3-310	3.11-21		Check actual locations of marked residences affected – some may be in the wrong location and others may no longer be residences.

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**L-012-070**

The subject images were early simulations meant to express general massing and alignment of the alternatives. The simulations also do not include lights, signage, and other details.

**L-012-071**

The FEIS provides additional information on intersection designs and inter-modal issues. There is no additional information provided for Light Rail alignments on north Main Street, which was eliminated with the selection of the LPA.

**L-012-072**

These two light rail alignments have been dropped from further analysis. Please refer to the Visual and Aesthetic Technical Report for a more comprehensive discussion of the potential visual impacts of light rail facilities.

**L-012-073**

Please see the response to comment L-012-060.

**L-012-074**

The UDAG recommendations, as shown in the Visual and Aesthetics Technical Report for the FEIS, are used as an evaluation criteria for project options and as a guide to the development of mitigations.

**L-012-075**

The air quality evaluation presented in the DEIS assessed how emissions would be expected to change by 2030 and how the project would affect emissions of pollutants regulated by state and federal standards as well as vehicle emissions that are not regulated. Oregon and Washington, as well as the federal government, have established ambient air quality standards for criteria pollutants. These standards are

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CHAPTER	PAGE	SECTION	LINE	COMMENT
L-012-078	3-314 to 315	3.11.5	Potential Mitigation for Long-Term Effects	Sound walls as high as 16 feet are contemplated as mitigation. However, the VMC allows sound walls only up to 12' high and only when certain conditions are met. A variance would be needed to construct sound walls higher than 12'. If approved, additional mitigation for the impacts of such extraordinarily high sound walls would be necessary. If not, additional mitigation for the noise impacts of the project would be necessary in addition to mitigation for the impacts of the sound wall itself, no matter how high it is.
L-012-079	3-315	3.11.5, Potential Mitigation for Long-term Effects	Fort Vancouver	This paragraph should also say <u>However, a 16-foot high sound wall located less than 10 feet from the west side of the historic Post Hospital building would have a substantial adverse visual and aesthetic effect on the VNH and the use of the building.</u>
L-012-080	3-315	3.11.5	Potential Mitigation for Traffic Noise	Residential insulation is contemplated as a mitigation strategy. The project should bear the cost of residential insulation for all affected residences.
	3-315	3.11.5	Potential Mitigation for Traffic Noise	Please address additional energy costs for A/C use in homes with improved windows if mitigation is made for sound problems (residents may be less likely to open windows for fresh free air due to traffic or HCT noise).
	3-315 to 3-316	3.11.5	Potential Mitigation for Transit Noise & Vibration	Install trackside lubricators at curves before completing project – do not wait for noise complaints.
L-012-081	3-316	3.11.5, Potential Mitigation for Temporary Effects	Last Bullet	Monitoring alone is not acceptable for an historic resource where there is risk of damage to historic features. The building should be reinforced in advance to avoid damage to the Post Hospital from construction of I-5 improvements.
<b>3.12: Energy</b>				
L-012-082				Energy demand for the various scenarios' construction and operation are estimated separately. Tolling scenarios are not analyzed openly or presented understandably. The complete picture of energy demand for each of the

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based on human health risks, including risks to bicyclists and pedestrians. The DEIS evaluation included an analysis demonstrating that the CRC project would allow the region to retain conformity with state and federal air quality standards for relevant criteria pollutants. See the Air Quality Technical Report for a detailed explanation of the state and federal regulations concerning air quality and the evaluation of how the project complies with relevant air quality regulations. See Chapter 3 (Section 3.10) of the FEIS for an explanation of the pollutants regulated by state and federal law. Impacts have been analyzed and disclosed in the DEIS and refined in the FEIS, and this information has been made available to stakeholders and decision makers.

#### L-012-076

The CRC project team, together with federal and state regulatory and transportation agencies, agreed upon an approach for estimating mobile source air toxics (MSAT) emissions at the regional and subarea levels. The CRC air quality study also followed well-developed analysis methods to evaluate criteria pollutants, which included an analysis of the six most congested locations (three in Washington and three in Oregon) for potential violations of carbon monoxide (CO) standards. Even the highest volume and most congested intersections would have CO concentrations well within applicable standards, eliminating the need to model emissions at the less affected intersections. As discussed in Chapter 3 (Section 3.10) of the FEIS, differences in 2030 MSAT emissions among the alternatives are extremely low and the CO concentrations at each of the study intersections would be below federal standards regardless of the selected alternative. Please see the Air Quality Technical Report for more information on regulatory standards, analysis methods, and the results of the air quality analysis.

#### L-012-077

Noise impacts to pedestrians and bicyclists were not modeled but were considered. The highest impacts would be associated with options

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CHAPTER	PAGE	SECTION	LINE	COMMENT
L-012-082				alternatives is not drawn. Energy demand is an important issue in this project and should be treated clearly and forthrightly.
	3-323	3.12.3, Tolling Scenarios		The individual tolling scenarios are not identified, nor are their individual analyses provided. The discussion is confusing because all the background information is missing. The discussion implies that tolls were studied on the I-5 bridges and also on the I-205 bridges, but does not provide any factual information for the reader to understand what scenarios were analyzed and how the results were derived. Information about whether tolls would apply to both sets of bridges and how (equally or not, at the same time or not, etc.) needs to be included here, even if it is contained in another part of the document. If it is contained in another part of the document, at the very least, a reference to that part should be inserted here. Currently, there is no way for the reader to make sense of this discussion.
	3-323	3.12.3, Tolling Scenarios	Last paragraph on page.	Is incomplete.
<b>3.13: Electric &amp; Magnetic Fields</b>				
L-012-083	3-329	3.13.2 & 3.13.3		Why do these paragraphs focus on the occupational exposure guidelines rather than the general public exposure guidelines? It appears that the EMF levels are also below the general public guidelines and those are most important for the project.
<b>3.14: Ecosystems</b>				
L-012-084	3-337	3.14.1, Protected Species	Last line on page	It is against Washington state law to divulge the locations of WS Priority Species. Please do not divulge the location of the Peregrine Falcons: <i>...Peregrine falcons utilize the existing bridge structure year-round.</i>
	3-342	3.14.2	Alt 1: No Build, middle of 1 <sup>st</sup> paragraph	It is against Washington state law to divulge the locations of WS Priority Species. Please do not divulge the location of the Peregrine Falcons: <i>...The bridge structure used by peregrine falcons raptors would remain.</i>

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where the pedestrian and bicycle path would be adjacent to the highway lanes. The selected LPA locates the bicycle and pedestrian path on the crossing underneath the highway deck, which would substantially reduce noise levels.

See the FEIS for an updated discussion of potential wheel squeal impacts and mitigation.

#### L-012-078

The noise and vibration analysis does take into account the effect of the walls themselves. Responses to your other comments have been provided where these comments are repeated (such as the project response regarding the height of noise walls).

#### L-012-079

The combination of impacts near the Hospital constitute an adverse effect to the resource.

#### L-012-080

See Chapter 3 (Section 3.11) of the FEIS and the Noise and Vibration Technical Report regarding FTA and FHWA policy on residential sound insulation. House or apartment owners impacted by transit noise exceeding the FTA's transit noise abatement criteria would be given the option of receiving sound-insulating window replacement, other insulation, and possibly air conditioning units for impacted bedrooms. Additional payments to cover the electrical energy associated with operating air conditioning is not proposed. LRT track and train testing will occur before the LRT opens for fare operations. This will provide an opportunity to detect and address unanticipated wheel squeal before fare operations begin.

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CHAPTER	PAGE	SECTION	LINE	COMMENT
L-012-084	3-343	3.14.2	Exh 3.14-10, left-hand column	It is against Washington state law to divulge the locations of WS Priority Species. Please do not divulge the location of the Peregrine Falcons: <i>Peregrine Raptor Habitat</i>
L-012-085	3-344	3.14.2	Alt 2	1 <sup>st</sup> two lines on page are repeated from page before-- makes it very confusing to read. At first glance it looks like a page is missing.
L-012-086	3-344	3.14.2	Alt 2, middle to end of 3 <sup>rd</sup> full paragraph	It is against Washington state law to divulge the locations of WS Priority Species. Please do not divulge the location of the Peregrine Falcons: ... with the exception of <i>peregrine falcons raptors</i> that utilize the existing bridge. The new bridge design will likely not include towers or other large structures above the roadway deck and may not provide suitable raptor habitat for these birds. Without suitable mitigation, the <i>falcons raptors</i> could leave the area.
	3-345	3.14.2	Alt 3, Exhibit 3.14-11, left-hand column	It is against Washington state law to divulge the locations of WS Priority Species. Please do not divulge the location of the Peregrine Falcons: <i>Peregrine Raptor Habitat</i>
	3-346	3.14.2	Alt 4, Exhibit 3.14-12, left-hand column	It is against Washington state law to divulge the locations of WS Priority Species. Please do not divulge the location of the Peregrine Falcons: <i>Peregrine Raptor Habitat</i>
	3-347	3.14.2	Alt 4, 1 <sup>st</sup> full paragraph	It is against Washington state law to divulge the locations of WS Priority Species. Please do not divulge the location of the Peregrine Falcons: ... with the exception of <i>peregrine falcons raptors</i> that utilize the existing bridge.
	3-348	3.14.2	Alt 5, Exhibit 3.14-13, left-hand column	It is against Washington state law to divulge the locations of WS Priority Species. Please do not divulge the location of the Peregrine Falcons: <i>Peregrine Raptor Habitat</i>
	3-352	3.14.4	Plants & Animals, 1 <sup>st</sup> sentence of 2 <sup>nd</sup> paragraph	It is against Washington state law to divulge the locations of WS Priority Species. Please do not divulge the location of the Peregrine Falcons: <i>Construction could substantially disturb the peregrine falcons raptors using or potentially using the existing bridge structure.</i>
	3-353	3.14.5	Last	It is against Washington state law to divulge the locations of WS Priority Species. Please do not divulge the location of the Peregrine Falcons:

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**L-012-081**

The proposed vibration monitoring will be used to only allow impacts under agreed-to thresholds. Rather than simply a means of reporting the vibration impacts, the monitoring program would be continual, enabling the field crews to stop work if thresholds are exceeded.

**L-012-082**

The DEIS and FEIS estimate the project's impacts on operational energy consumption as well as construction energy consumption. The operational analysis is based on traffic demand modeling and an energy multiplier. This method captures the primary energy savings at the river crossing associated with changes in trips and speed, but does not capture the full energy savings from reducing the congestion associated with bridge lifts and crashes. Bridge lifts and crashes both result in increased traffic congestion, traffic idling and higher energy consumption. This model also does not reflect the secondary energy savings associated with reduced fuel consumption. As such it is only a partial estimate of energy reduction associated with operations. The construction analysis uses a CALTRANS model that reflects the comprehensive energy "costs" associated with all construction activities and materials (both primary and secondary energy use). Therefore, because the construction estimates and operational estimates are not comparable, there is no estimate of an energy "payback" period.

The various components of each alternative - tolling, light rail, highway interchange improvements, river crossing, bicycle/pedestrian improvements - were not modeled individually. The project did not propose to implement these components individually, but rather to implement multi-modal alternatives.

The tolling scenarios were described in the Project Description chapter of the DEIS, Chapter 2 (Section 2.3.5). Please see Chapter 2 (Section

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CHAPTER	PAGE	SECTION	LINE	COMMENT
L-012-086			paragraph	...Platforms could be built to mitigate for the replacement crossing's removal of the peregrine falcon potential raptor habitat.
<b>3.15: Wetland &amp; Jurisdictional Waters</b>				
L-012-087	3-355	3.15	Jurisdictional wetlands	The Draft EIS limits the identification and study of wetlands to those that are "jurisdictional" or regulated by the Corps. However, there are wetlands that the Corps would not regulate, but the City of Vancouver and the State of Washington would. For example, there is a string of small wetlands along Burnt Bridge Creek, to the east of I-5, directly across from the Kiggins Bowl wetland and south of the wetlands the Draft EIS refers to as the "Burnt Bridge Creek Wetlands." These wetlands and their buffers could be directly or indirectly impacted by the project. These wetlands and buffers would be regulated under the City's Critical Areas Protection code (VMC 20.740) and also under the City's Shoreline Management Master Program (VMC 20.760). Impacts to these wetlands and buffers needs to be analyzed in the EIS and mitigation identified for any unavoidable impacts. This analysis is necessary for the EIS to be in compliance with and used to satisfy SEPA requirements.
<b>3.16: Hydrology &amp; Water Quality</b>				
L-012-088				Vancouver is opposed to traditional surface stormwater facilities within the project, particularly treatment or detention facilities west of I-5, including Main Street, the SR-14 interchange, and Waterside areas because that would not be consistent with the Vancouver City Center Vision and City policy. There may be opportunities east of I-5 for stormwater facilities to be developed as urban amenities (such as terraces and rain gardens) that feed into and enhance the landscape restoration planned by the National Park Service.
				We note that this chapter addresses primarily water quality with very little attention to hydrology. Please include a statement that neither Oregon nor Washington regulations require flow controls for the Columbian River. This was stated in the Hydrology & Water Quality Technical Report, and should

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2.2.4) of the FEIS Chapter for an updated description of the proposed tolling for the LPA.

#### L-012-083

You are correct. This has been revised in the FEIS, Chapter 3 (Section 3.13).

#### L-012-084

Please see response to L-012-086.

#### L-012-085

This typo was corrected for the FEIS.

#### L-012-086

Peregrine use of the existing bridge is also noted in the FEIS to ensure that decision-makers and the public understand the impacts the LPA could have on this species. As a matter of policy, information on priority species obtained from the Washington Department Fish and Wildlife (WDFW) may not be publicly disclosed. However, as information on Peregrine use of the bridge is accessible from a variety of publicly available sources, including the Oregonian and Oregon Department of Transportation, this discussion does not violate WDFW policy.

#### L-012-087

The FEIS has been updated to identify all currently existing wetland resources that may be impacted by the project, based on current available information and professional judgement.

#### L-012-088

The project is planning for compliance with NPDES permit requirements and the FEIS includes the requested statement regarding flow controls.

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CHAPTER	PAGE	SECTION	LINE	COMMENT
L-012-088				be restated in this chapter.
				The project should be planning for compliance with the new NPDES permit requirements.
	3-380	3.16.1	Exh 3.16-2	This exhibit is too small to clearly discern the relationship between the project and the floodplains of the Columbia River and particularly of Burnt Bridge Creek north of SR-500. At the current level of detail visible, this exhibit does not support the statements in the 3 <sup>rd</sup> paragraph on pg. 3-383.
	3-383	3.16.1, Burnt Bridge Creek	3 <sup>rd</sup> paragraph	These statements are not supported by Exhibit 3.16-2 because there is not enough detail to clearly see that <i>This project would not extend into the 100-year floodplain of this stream.</i>
<b>3.17: Geology &amp; Soils</b>				
L-012-089	3-395	3.17.1 and Exhibit 3.17-1	Last paragraph on this page	While we recognize that the Relative Earthquake Hazard Map (REHM) is a map that was developed by DOGAMI and WDNR together and therefore makes consistent analysis on both sides of the river possible, it is important to note that it dates from about 1994 and has been replaced in Washington by updated maps that are considered the "best available science" under GMA. The City of Vancouver's regulations are based on these new maps: (1) <i>Alternative Liquefaction Susceptibility Map of Clark County, Washington based on Swanson's Groundwater Model</i> by Stephen P. Palmer, Samantha L. Magsino, James L. Poelstra, and Rebecca A. Niggemann, September, 2004, as revised or superseded; and (2) <i>Site Class Map of Clark County, Washington</i> by Stephen P. Palmer, Samantha L. Magsino, James L. Poelstra, and Rebecca A. Niggemann, September, 2004 as revised or superseded. EIS analysis should include any differences between the REHM and the new maps to be consistent with the Growth Management Act requirements and City of Vancouver regulations, and to be in compliance with and used to satisfy SEPA requirements.
	3-402	3.17.3	1 <sup>st</sup> paragraph on this page	<i>Park and ride structures could include underground parking. Deeper excavation is more likely to encounter groundwater. There is greater potential for this risk at the Kiggins bowl park and ride facility. Facilities would need to be designed to avoid leaks into or flooding of the lower levels</i>

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Graphic size was limited by the volume of information included in the DEIS, however, larger floodplain exhibits are included in the Water Quality and Hydrology Technical Report that supports the FEIS. Regarding stormwater facilities, they will be designed in accordance with relevant code requirements.

#### L-012-089

Thank you for the clarification regarding the updated earthquake hazard maps.

The protection of the Sole Source Aquifer is of great importance. The project staff has completed a focused evaluation of the potential impacts and has worked with the City since publication of the DEIS on this topic. The project has found (Section 1.4.2.2 of the Hazardous Materials Technical Report) that all park and ride structures and light rail stations will be constructed using shallow footings. Only one park and ride structure will require excavation, the Clark College Park and Ride. The depth to groundwater at McLoughlin is relatively deep (greater than 90 feet). This will need to be verified in the field during the GeoTech Drilling Program. Potential impacts to groundwater from the Park and Ride are low.

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L-012-089				<p><i>which could impact groundwater resources.</i></p> <p>This paragraph should reiterate in stronger, more straightforward language that the groundwater that could be impacted by excavation and operation of the park and ride facilities is the same groundwater that Vancouver's citizens drink. The entire city area is a Critical Aquifer Recharge Area under the Growth Management Act. Discharges to groundwater, stormwater, or surface water such as the potential leaks and floods contemplated in this paragraph are specifically prohibited under VMC 14.26, Water Resources Protection. The risk of groundwater and surface water contamination should be quantified or at least expressed in a qualitative measure and mitigation measures should be identified and analyzed in the EIS. This work is also necessary to satisfy SEPA requirements.</p>
	3-402	3.17.4	2 <sup>nd</sup> paragraph	De-watering is a potential mitigation measure, and its efficacy should be discussed and analyzed. Avoidance, however, has not been mentioned and must be the first option. Groundwater contamination could be avoided by not building the park and ride structures deep enough to contact groundwater.
<b>3.18: Hazardous Materials</b>				
NO COMMENTS				
<b>3.19: Cumulative Effects</b>				
L-012-090	3-421	3.19		General comment on cumulative effects. Cumulative effects also include the cumulative effects of all of the CRC project components, including the potential mitigations for identified impacts. These are not addressed in this section and, where they are addressed in other locations within the document, are inadequate to draw informed conclusions regarding cumulative project impacts to Vancouver.
	3-423	3.19, Recent Development	Second bullet	Heritage Place is a mixed use (residential and commercial) development.
	3-426	3.19.2, Economics		Here again there is no discussion of the cumulative impacts of the CRC project itself on economics—when aesthetic, air quality, construction,

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It is unclear how the cumulative effects section in the DEIS is inadequate to draw informed conclusions regarding cumulative impacts in Vancouver. To clarify, cumulative effects for the purposes of this EIS are not just "cumulative project effects," but rather an assessment of how the effects of this project may relate to previous actions and reasonably foreseeable future actions to cumulatively affect the environment.

Regarding the Heritage Place development, we have corrected our statement to "mixed use."

Again, this section treats "cumulative" as a method of looking at this project in relation to other past and reasonably foreseeable future actions. Overall project effects to a certain element of the environment, such as economics, are addressed in a separate section. So, the assessment of how this project would affect planned growth in Vancouver is located in Chapter 3 (Section 3.4) of the FEIS.

Our assessment of the wider freeway revealed it would not significantly widen the divide between the western and eastern halves of the freeway. Though in some places there will be several more auxiliary lanes, as you note, there would be relatively modest increases in right-of-way used by I-5.

Landscaping has not yet been determined, but along most areas of I-5 through the project area landscaping is expected to be accommodated. Though much of the existing landscaping will likely need to be removed for construction, landscaping will be added back to locations where feasible.

See above for landscaping and the width of the freeway. Regarding east-west connectivity, the project proposes a variety of bicycle and pedestrian improvements along streets crossing the freeway. In general,



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L-012-090				acquisition, traffic, and other impacts are all combined, what is the impact to the viability of achieving the planned growth in Vancouver's downtown core? There is no way to tell from the information presented.
	3-427	3.19.3, Environmental Justice	2 <sup>nd</sup> paragraph	Although the right-of-way would not be significantly increased, it is incorrect to say that the roadway would only be slightly widened. It will double in size, eliminating landscaping and replacing it with retaining walls and sound walls. The freeway will no longer be an edge between neighborhoods, it will be a substantial barrier visually (eliminating views across it) and making crossing it an even more unpleasant experience.
	3-428		1 <sup>st</sup> paragraph	Doubling the number of lanes on the freeway will eliminate landscaping along its edges through downtown – a change in use from landscaping to roadway, that when coupled with the huge sound walls will significantly affect land uses along it and create a barrier between neighborhoods.
	3-429		3 <sup>rd</sup> paragraph	4 <sup>th</sup> sentence. The CRC project will not improve access across I-5, especially for pedestrians and bicyclists. The widening will double the number of lanes that have to be crossed, eliminating all the landscaping along the edges and replacing them with huge sound walls. This will be a barrier, not a benefit to pedestrians on the Discovery Trail. Unless the project includes the planned 7 <sup>th</sup> Street overcrossing, it will effectively preclude development of this pedestrian link between downtown and VNH.
	3-433	3.19.9, Long-Term Impacts		This section should also discuss the role of lower-speed, low emissions vehicles, and how they will be served in the future to accommodate short trips, and how the CRC project will aid or preclude these use of that technology.
	3-439	3.19.11, Energy & Peak Oil		This section should note that none of the alternatives are being designed to accommodate lower-speed hybrid or electric vehicles, or mopeds, or scooters, or similar lower-speed conveyances.
	3-441	3.19.14, Historic Resources		The impacts to historic resources will be substantial as currently designed, particularly the negative impacts of the proposed sound wall (16 feet high, located less than 10 feet from the west side of the Post Hospital) on the

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bicycle and pedestrian connections across I-5 would improve with construction of the CRC project. The 7th Street overcrossing and other planned crossings over I-5 in the project area are discussed in various sections of Chapter 3 in the FEIS.

Low-speed vehicles are not currently planned to be accommodated on the I-5 crossing, as these cannot operate safely on interstate facilities, or on pathways dedicated for bicyclists and pedestrians.

Potential impacts to historic resources are discussed in Chapter 3 (Section 3.8) of the DEIS and FEIS, including how the project may affect the Post Hospital.

Impacts to the Discovery Trail and other parks and recreation facilities are discussed in Chapter 3 (Section 3.7) of the DEIS and FEIS. See above for bicycle and pedestrian connections across the freeway.

Aesthetic impacts of sound walls and a widened I-5 corridor are addressed in greater detail in Chapter 3 (Section 3.19) of the FEIS, however, the impacts do not represent a substantive difference in the cumulative effects of past, present, and reasonably foreseeable future actions on visual quality.

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L-012-090				setting and use of the building (light and air to the first floor and basement would be restricted by the wall).
	3-441	3.18.15, Parks & Recreation Areas		This section does not evaluate the impacts to the Discovery Trail that crosses the area on Evergreen Blvd as well as along the Columbia River. The statement that the project will have minimal impact on bicycle and pedestrian access across I-5 is not true or justified by any analysis. Doubling the width of the freeway, eliminating landscaping and replacing it with retaining walls topped by 16-foot sound walls, without improving east-west links across it will worsen access from downtown to the VNHR. The proposed interchange design at Mill Plain will make pedestrian and bicycle access under the freeway more difficult and dangerous. These are in no way "small" impacts on trails or bicycle and pedestrian access to the parks on either side of I-5.
	3-441 & 442	3.19.16, Visual Quality & Aesthetics		This section should include the impacts of the sound walls and of eliminating landscaping on views from I-5 and across I-5 between downtown and the VNHR.
CHAPTER 4: Financial Analysis				
L-012-091				This section does not include an impact analysis. The incidence of the benefits and burdens of the project financing scenarios have to be disclosed. Additionally, the impact to funding other, ongoing, and planned regional improvements, such as those planned along SR-14, SR-500, and I-205 need to be disclosed and evaluated for impact. Without an impact analysis it is impossible to identify impacted populations, facilities, and resources; and to determine what, if any, mitigation may be appropriate. For example, do the tolling alternatives have a disproportionate impact on low-income populations? What about other taxing scenarios? Is an increase in the regressive sales tax equitable, or does it impose a disproportionate burden on low income populations to fund LRT improvements that will serve high-income suburban commuters? The information to answer these and other

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As discussed in Chapter 3 (Section 3.5) of the DEIS, tolling could impact low-income or minority populations by introducing a new expense that could be proportionally a greater share of total income for low-income individuals, requiring that all users obtain transponders for electronic toll collection, and instituting a new tolling system that could be confusing or difficult to communicate to individuals with limited English proficiency.

However, without a toll the project likely could not be funded, or if funded, the new capacity on the bridge would be filled faster and light rail transit ridership would be lower. Including a toll would reduce congestion, improve travel times, and could result in a slight improvement in air quality by reducing emissions, which would benefit all users. See Chapter 3 (Section 3.5) of the DEIS and Chapter 3 (Section 3.5) of the FEIS for a description of impacts and benefits of the project to EJ populations. Proposed measures to reduce the potential impacts to low-income or minority residents as a result of instituting a toll are listed in Chapter 3 (Section 3.5) of the FEIS.

The impacts of project financing are discussed in the various sections of the DEIS and the FEIS. Impacts to businesses are in Chapter 3 (Section 3.4) and impacts to EJ communities are in Chapter 3 (Section 3.5).

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L-012-091				questions must be disclosed so that impacts and mitigations can be identified.
CHAPTER 5: Draft Section 4(f) Evaluation				
L-012-092				<p><u>Post Hospital</u></p> <p>The replacement bridge option widens the freeway to 12 lanes and moves the freeway to within 14-16 ft of the west wall of the post hospital.</p> <ul style="list-style-type: none"> <li>The proposal to mitigate the increased noise at the Hospital is a 16' sound wall. The sound wall option doesn't appear to take into consideration the reuse plans for the building (which were approved by the Vancouver City Council in the 2002 West Barracks Reuse Plan). The Hospital is scheduled to be an arts facility with galleries and a black box theater but primarily artist studios. A 16' high sound wall will be visually unattractive and will severely restrict the natural light entering the rooms on the lower floors of the west side of the building (where many of the studios would be located). Both of these impacts will make the space difficult to reuse as planned. Consideration needs to be given to a solution to the increased sound that will be visually appealing and of key importance, not block the natural light.</li> <li>Chapter 5, pg 17 notes that the Historic Reserve plans call for the removal of Anderson Street and proposes that the CRC's removal of Anderson as it runs behind the hospital helps meet this objective. This information is incorrect. As the attached map indicates, the plans are to remove the curvilinear portion of Anderson Street between Fort Vancouver Way and Barnes Road not the portion that runs behind the hospital. That section was scheduled to remain and be reconfigured to provide additional parking and a more landscaped buffer between the West Barracks and I-5.</li> </ul> <p><u>VNHR/Downtown Connection</u></p>

**L-012-092**

The City of Vancouver will not be forced into having sound walls along its property boundaries. If sound walls are determined cost-effective, it is the property owner that will have the ultimate authority to decide if the sound wall is desired.

The statement regarding the removal of Anderson Street as being consistent with VNHR plans has been removed from the document.

The design of the Evergreen Community Connector is being coordinated with the City of Vancouver, NPS, the VNHR Trust, and other stakeholders.

As discussed in Chapter 3 (Section 3.8) of the FEIS, there will not be vibration impacts to the Carnegie Library building, nor will the parking be displaced. Dust from construction activities will be controlled on site. No construction will occur on the streets (16th and Main) adjacent to the museum.

The updated layout of the Marshall Community Center complex has been used in the Final Section 4(f) Evaluation. CRC project staff has worked closely with Vancouver-Clark Parks and Recreation staff to minimize impacts to this property and identify appropriate mitigation for unavoidable impacts.

Chapter 3 (Section 3.7) of the DEIS and the Draft Section 4(f) Evaluation disclosed both the permanent direct property impacts to Old Apple Tree Park, as well as the potential for construction-related impacts to, and post-construction shading of, the Heritage Apple Tree. These effects would not have made access to Old Apple Tree Park more difficult. The design of the SR 14 interchange has been refined and now avoids all direct impacts and airspace impacts to Old Apple Tree Park, and provides more space between the interchange ramp and the Heritage

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L-012-092				<p>A 12 lane freeway will significantly widen the divide between downtown Vancouver and the Historic Reserve. Part of the future success of the Reserve as a tourist attraction depends on the ability of pedestrians to access the Reserve from downtown. The National Park Service General Management Plan and the VNIH Long Range Plan both call for a pedestrian bridge over I-5 at 7<sup>th</sup> Street. The DEIS mentions a "connector/cover" between Evergreen and 5<sup>th</sup> Street. This was originally proposed by various interests in Vancouver as a way to protect the hospital and other West Barracks buildings from the noise and visual impacts of the widened freeway in addition to providing a stronger connection to downtown. Subsequent information indicated that due to the slope of the freeway, a cover would be limited in size. Located adjacent to the current Evergreen Blvd. freeway crossing, it would only reach to the north end of the hospital and would do little to mitigate the effects of the freeway on the Hospital or other West Barracks buildings. A better solution would be a series of integrated connectors at 5<sup>th</sup>, 7<sup>th</sup> and Evergreen that would a) link the Reserve to downtown in a number of locations for a more seamless reconnection b) could be designed in such a way that it would serve as a dramatic "gateway" to Vancouver.</p> <p><u>Carnegie Library/Clark County Historical Museum</u></p> <p>DEIS failed to analyze the following potential impacts to the Carnegie Library/Clark County Historical Museum. The effects of construction, continued operation of a transit guideway, and impacts to adjacent parking will have a significant and adverse affect on the integrity of the property, building and historic artifacts stored within the building. In particular:</p> <ul style="list-style-type: none"> <li>▪ The building has an unreinforced masonry block foundation. This foundation may fail or may be jeopardized due to vibration associated with construction of the transit element. This foundation will also sustain prolonged exposure to vibration associated with activation and use of an LRT transit guideway and may fail or be structurally jeopardized as a result.</li> <li>▪ The building has no HVAC ventilation system for interior air circulation</li> </ul>

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Apple Tree, thereby avoiding any potential for shading the tree.

Similar to Old Apple Tree Park, the DEIS does address the potential for construction-related impacts to Waterfront Park and describes the potential long-term impacts to the Park. At the time of DEIS publication, it was not yet known whether Waterfront Park would have been allowed to continue to function beneath the new I-5 bridge, hence the uncertainty regarding specific impacts. An updated discussion regarding the impacts to Waterfront Park can be found in Chapter 3 (Section 3.7) of the FEIS and the Final Section 4(f) Evaluation, as can measures to mitigate for these impacts.

Suggested text changes have been included in the Final Section 4(f) Evaluation.

As discussed in Chapter 3 (Section 3.7) of the FEIS, much of the Discovery Trail is public sidewalk. The portion of the trail that is a dedicated recreation facility (i.e., the Waterfront Renaissance Trail) is addressed in the Final Section 4(f) Evaluation.

Vibration and visual impacts to the Post Hospital are discussed in Chapter 3 (Section 3.8) of the FEIS.

Potential permanent impacts to Leverich Community Park were addressed in the Draft Section 4(f) Evaluation and are addressed in the Final Section 4(f) Evaluation.

In a Section 4(f) Evaluation, impacts that are considered de minimis (i.e., minimal) do not require an evaluation of alternatives to further minimize harm to these resources.

The proximity impacts to Post Hospital are evaluated in the constructive use section of the Final Section 4(f) Evaluation.

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L-012-092				<p>and air conditioning. The building is very susceptible to contamination related to dust and related construction induced air impacts. The museum hosts a permanent collection of historical records and artifacts. These records are easily contaminated. No analysis of the potential impacts to the displayed or archived materials resulting from construction dust or other induced air impacts was evaluated, nor was a mitigation plan for preventing or abating those impacts proposed.</p> <ul style="list-style-type: none"> <li>▪ The building has no HVAC ventilation system for air conditioning. Therefore it is very susceptible to outside noise when windows are opened for ventilation. The DEIS failed to analyze the increased noise levels that will be present within the building related to project actions.</li> <li>▪ The building has single-pane windows which are very susceptible to noise impacts. The DEIS failed to analyze the increased noise levels associated with construction and permanent operation of the proposed adjacent transit systems due to the limited window sound insulation present in the existing window.</li> <li>▪ The building has a sole ADA parking spot adjacent to building on W 16th Street. DEIS failed to recommend a satisfactory remedy to the loss of parking - in particular, the ADA parking space - adjacent to the museum building.</li> </ul>
				<p><u>Marshall Community Center &amp; Park</u></p> <p>DEIS failed to sufficiently analyze impacts related to construction of a light rail transit stop on McLoughlin in front of the Marshall Community Center.</p> <ul style="list-style-type: none"> <li>▪ Marshall Community Center was updated and the building renovated. The renovations included modifications to the ADA and other parking spaces in front of the building. Additionally, building frontage modifications included a new sidewalk and landscaping. The project did not evaluate the impact of the current designs relative to the newly-configured building and parking layout. Nor did the project recommend mitigations resulting from direct impacts of building a bus-bay in front of the building and the resulting encroachment upon the parkland.</li> </ul>

The project selected both the Intermediate alignment and reduced a northbound auxiliary lane to minimize impacts to the VNHR.

Temporary impacts are not considered a "use" of a Section 4(f) resource.

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L-012-092				<p><u>Old Apple Tree Park – Heritage Tree</u>            DEIS failed to analyze built environment, noise, construction air quality and vibration impacts and post-construction shadows and visual impacts to the Old Apple Tree Park – Heritage Tree. The project will adversely affect the presence of the park through substantial alteration of the landscape and setting and cultural landscape. Years of City resident, business, and stakeholder initiatives have focused on connecting and enhancing the cultural, historic and interpretive landscape of Vancouver, and preserving historical resources and landscape elements. Much of that focus has been the process of enhancing the resources and landscape through restorative efforts and creating physical connections which tie the individual elements into a cohesive interpretive experience. The DEIS fails to consider the cumulative impacts to this effort through the assessment of each site in isolation and not as a cohesive whole. Additionally, the DEIS fails to disclose any direct impacts related to construction of physical elements or structures. No mitigations for these impacts have been identified.</p>
				<p><u>Waterfront Park</u>            DEIS failed to analyze built environment, noise, construction air quality and vibration impacts and post-construction shadows and visual impacts to Waterfront Park. The project will adversely affect the presence of the park through alteration of the landscape and setting and cultural landscape. Years of City resident, business, and stakeholder initiatives have focused on connecting and enhancing the cultural, historic and interpretive landscape of Vancouver, and preserving historical resources and landscape elements. Much of that focus has been the process of enhancing the resources and landscape through restorative efforts and creating physical connections which tie the individual elements into a cohesive interpretive experience. The DEIS fails to consider the cumulative impacts to this effort through the assessment of each site in isolation and not as a cohesive whole. Additionally, the DEIS fails to disclose any direct impacts related to construction of physical elements or structures. Rather, it suggests that physical impact locations are yet to be determined which suggests they are</p>

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L-012-092				likely, and thus the DEIS failed to analyze potential impacts. No mitigations for these impacts have been identified.
	5-4	Exh. 5.2-1		<ul style="list-style-type: none"> <li>▪ Entry #2 - The name of the park is Waterfront Community Park and it extends under the current I-5 bridge to include the Discovery boat sculpture.</li> <li>▪ Entry #5 - The name of the park is Old Apple Tree Park and Historic Site</li> <li>▪ Entry #8 - The name of the park is Leverich Community Park</li> </ul>
	5-17	5.2.3, VNIHR Plans		Removing Anderson Street and replacing it with landscaping is (N NO WAY the same as removing it by converting it to I-5 roadway and topping it with a 16-foot sound wall less than 10 feet from the edge of the Post Hospital. Thus the statement that the proposal is consistent with this goal is disingenuous and false.
	5-17	5.2.3, VNIHR Plans	Last paragraph	The second sentence should indicate that the 7 <sup>th</sup> Street overcrossing is part of the adopted circulation plan in the Vancouver Comprehensive Plan, not just that the city would like to construct it.
	5-19	5.3.1	Exhibit 5.3-1	Impacts to the Discovery Loop Trail are not included. (See attached section of the 2004 VCPD Paths & Trails Master Plan describing the trail and planned improvements. In addition, see information on the VCPD website: <a href="http://www.cityofvancouver.us/parks-recreation/parks_trails/trails/discovery_loop.htm">http://www.cityofvancouver.us/parks-recreation/parks_trails/trails/discovery_loop.htm</a> )
	5-19	5.3.1	Exhibit 5.3-1	Vibration and visual impacts to the Post Hospital are not described, but could be significant.
	5-47			The DEIS does not include an analysis of the project's impacts to the Discovery Loop Trail which crosses I-5 on Evergreen Blvd and Columbia/Columbia Way. The impact analysis should include the disruption caused by construction and noise, air quality and aesthetic impacts to the trail user during construction and when complete.
	5-48	5.3.3	Waterfront Park	Any encroachment on the Waterfront Park, the Waterfront Renaissance Trail, and the Boat of Discovery Monument, whether in the air, or with a

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L-012-092				pier, would be an impact to an important Vancouver 4(i) resource.
	5-49			This section should include an analysis of the impacts to Leverich Community Park and the roads and sidewalks used to access the park, particularly during construction.
	5-51	5.3.4. Potential Constructive Uses		Constructing the freeway to within 10 feet of the Post Hospital and topping the retaining wall with a 16-foot sound wall would block light and air to the first floor of the building and basement and make it impossible to complete VNHR plans to create a landscape buffer between I-5 & the building. This would substantially impair use of the building, its visual setting and implementation of the VNHR long range plan.
	5-60	5.5.3. Minimizing Harm		The following resources should be included in the list of 4(f) resources potentially affected by the project. The project impacts to them should be evaluated: <ul style="list-style-type: none"> <li>▪ Marshall Community Center and Park</li> <li>▪ Leverich Community Park</li> <li>▪ Discovery Loop Trail</li> </ul>
	5-64	5.5.3. Minimizing Harm	3 <sup>rd</sup> paragraph	Removing Anderson Street by replacing it with landscaping as is planned in the VVHR Master Plan, is IN NO WAY the same as removing it by converting it to I-5 roadway and topping it with a 16-foot sound wall less than 10 feet from the edge of the Post Hospital. Thus the statement that the proposal is consistent with this goal is disingenuous and false.
	5-65	5.5.3. Minimizing Harm	Shift Replacement Crossing to Intermediate Alignment	Vancouver supports shifting to the Intermediate Alignment if it is not possible to narrow the roadway by eliminating at least one auxiliary lane adjacent to VNHR.
Appendix D: Comprehensive List of Potential				



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Parcel ID numbers have been corrected.

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Property Acquisitions				
<b>L-012-093</b>	D-3			The following serial numbers should have a leading zero making the eight-digit number into a nine-digit number:
			038279920	Marshall Community Center
			038279927	Land Bridge
			038279934	Marshall Community Park
			038279935	Old Apple Tree Park & Historic Site
			01405000	Leverich Community Park
			011531000	Leverich Community Park
			011538000	Leverich Community Park
			038279920	Marshall Community Center
			038279934	Marshall Community Center



Thank you for taking the time to submit these additional materials.

L-012-094

RECOMMENDED IMPROVEMENTS

**PROJECT 3: Discovery Loop / Central City**

This project includes the Discovery Historic Loop and other trail segments that are in the central city area of Vancouver. The recently completed Discovery Historic Loop offers many historic and scenic attractions along the 2.3-mile trail. The Loop begins on East Evergreen and winds through Fort Vancouver National Historic Site, Officer's Row, and downtown Vancouver, joining the Waterfront Renaissance Trail at Vancouver Landing. Sights along the way include Fort Vancouver, Pearson Air Museum, Providence Academy and Esther Short Park. Although construction of the trail is complete, a number of trail amenities such as benches and signage are recommended to realize the full potential of the Loop. Additionally, a connection with the Amtrak station and a land bridge through Old Apple Tree Park are recommended to create a larger loop connecting this path with the Columbia River and central city areas. The numbering of segments in this section starts with the Discovery Loop and then runs from south to north beginning at I-5 and the Columbia River.



Figure III-4: Project 3, Discovery Loop / Central City

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SECTION III

**Segment 3A: Discovery Historic Loop** ~4.8 miles

**Improvement Type**

Trail upgrades including addition of amenities such as signage and benches

**Route**

Evergreen Blvd. to E Reserve, to E 5<sup>th</sup> St. through Keiwi, under SR-14 to Central River Reach, to Old Apple Tree Park, to E 5<sup>th</sup> St.

**Description**

The Discovery Historic Loop Trail offers a diversity of cultural and historical experiences to walkers and bicyclists in Vancouver. This urban trail traverses through Downtown Vancouver, the Fort Vancouver National historic site, Officers Row national Historic District, and along the Columbia River waterfront. The Discovery Historic Loop also provides a transportation route for bicyclists and pedestrians traveling east of downtown.



*Pioneer Mother statue*



*Officers Row*



*Capt. Vancouver Plaza sign*



*Underpass at Old Apple Tree Park*

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RECOMMENDED IMPROVEMENTS



Vancouver's Discovery Historic Loop



Public art at the waterfront



Evergreen Arboretum

L-012-094

SECTION III

**Segment 3B: SR 14 Overpass- Land Bridge ~0.8 miles**

**Improvement Type**

Develop Landbridge

**Route**

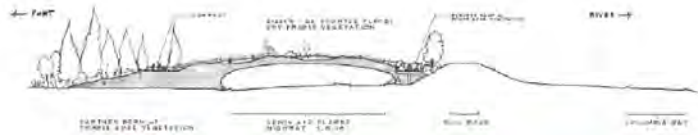
5<sup>th</sup> Street to Waterfront Park

**Description**

Proposed Landbridge to connect 5<sup>th</sup> Street to Waterfront Park through Apple Tree Park. The Landbridge reinstates the vital, historic connection between Fort Vancouver National Historic Reserve and the river edge, and establishes a gateway to the City of Vancouver.

**Typical Treatment**

Concept plan for Landbridge courtesy of Jones & Jones, Maya Lin Confluence Project/ Ft. Vancouver.



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Paths & Trails Element  
Vancouver Walking & Bicycling Master Plan