From: Williams, Kathryn

To: Gundersen, Heather;

CC: Draft EIS Feedback;

Subject: Port of Portland CRC DEIS Comments

Date: Tuesday, July 01, 2008 3:01:43 PM

Attachments: CRC_DEIS_PortofPortland_comments.pdf

<<CRC_DEIS_PortofPortland_comments.pdf>>

Heather,
I've attached the Port of Portland's CRC DEIS comments, for your review. A hard copy will follow in the mail.
Please feel free to contact me with questions or concerns.
Kind regards,
Kathryn

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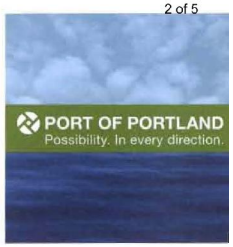

Mission: To enhance the region's economy and quality of life by providing efficient cargo and air passenger access to national and global markets.

July 1, 2008

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

RE: Comments on Draft Environmental Impact Statement

Dear Ms. Gunderson:

L-017-001

The convergence of surface transportation and port facilities in Portland and Vancouver make the Interstate 5 (I-5) corridor, between the Interstate 84 interchange in Oregon and the Interstate 205 (I-205) interchange in Washington, the crossroads for freight flows by all modes into, through and around this region. Our geographic good fortune and wise past transportation investments have created a system that is the foundation for this region's economic activity. The Portland/Vancouver region is an established distribution area and we reap the benefits of a market area larger than our jurisdictional boundaries and population base due largely to the transportation network serving it. Our ability to serve that broader market is directly dependent on the ability of the transportation system to support business needs by moving products to market, particularly in the I-5 corridor.

I-5 carries the highest volumes of freight in the States of Oregon and Washington and it is the key route for freight originating or destined for Portland or Seattle. Within the study area, I-5 is the most congested segment of the regional freeway system and is one of the most significant bottlenecks on the interstate serving the West Coast. Both the future development of this region's job base and the viability of rail, marine, truck and air modes are impacted by the congestion in this corridor.

For this reason, we appreciate the opportunity to make formal comments on the Columbia River Crossing (CRC) Draft Environmental Impact Statement (DEIS). We have participated in both the CRC Task Force and the Freight Working Group. Both forums provided the opportunity to ensure that this critical infrastructure project will help to support the Port's mission to enhance the region's economy and quality of life by providing efficient cargo and air passenger access to national and global markets.

L-017-002

The Port supports a new replacement crossing with light rail transit (alternative 3). We also support improvements to the seven interchanges within the study area, including an improved interchange at Marine Drive to meet the intermodal access needs of our marine terminals and businesses in the Rivergate Industrial Park. We support the use of tolls to finance the project and manage traffic demand.

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L-017-001

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

L-017-002

Preferences for specific alternatives or options, as expressed in comments received before and after the issuance of the DEIS, were shared with local sponsor agencies to inform decision making. Following the close of the 60-day DEIS public comment period in July 2008, the CRC project's six local sponsor agencies selected a replacement I-5 bridge with light rail to Clark College as the project's Locally Preferred Alternative (LPA). These sponsor agencies, which include the Portland City Council, Vancouver City Council, TriMet Board, C-TRAN Board, Metro Council, RTC Board, considered the DEIS analysis, public comment, and a recommendation from the CRC Task Force when voting on the LPA.

With the LPA, new bridges will replace the existing Interstate Bridges to carry I-5 traffic, light rail, pedestrians and bicyclists across the Columbia River. Light rail will extend from the Expo Center MAX Station in Portland to a station and park and ride at Clark College in Vancouver. Pedestrians and bicyclists would travel along a wider and safer path than exists today.

The Oregon and Washington departments of transportation anticipate that tolling will be part of any funding plan for the CRC project. Additional funding will likely come from federal, state and regional sources.

For a more detailed description of highway, transit, and bicycle and pedestrian improvements associated with the LPA, see Chapter 2 of the FEIS.

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L-017-003

Marine Drive Interchange

We have participated in the CRC Freight Working Group (FWG) over the past several years and appreciate both CRC staff and FWG members' thorough attention to the interchange design process. CRC staff has helped this group evaluate traffic flow associated with grade changes, lane and shoulder widths and turning radii to ensure that truck access and mobility is maximized in the design.

The Marine Drive interchange is the most critical freight interchange within the State of Oregon. It provides direct access from the interstate to the State's only intermodal container terminal – Terminal 6 – and the freight logistics center in Rivergate. Terminal 6 is currently operating at one quarter of its full capacity and with projected new lease arrangements, will increase its traffic substantially over time. Any redesign of this interchange must ensure that freight mobility is the design priority. Of the three interchange design options presented within the DEIS, the first alternative or "standard design," which retains most of the exiting Marine Drive alignment west of the interchange, best accommodates current and future freight movements. The "standard design" allows free-flow movement for the highest traffic flows and minimizes and/or eliminates stops to enhance truck mobility. This design also minimizes the need for new right-of-way acquisition, helping to control costs.

Recognizing that final design of the Marine Drive interchange will occur in the coming months, we have several concerns related to the two alternative designs ("southern realignment" and "diagonal realignment") outlined within the DEIS and others that continue to be discussed. These designs push the interchange connection to Marine Drive to the south, running adjacent to the Expo Center and the Vanport wetlands, connecting to the existing Marine Drive at Force Avenue. In yet another alternative, portions of the Expo Center and portions of the industrial land just west of Force Avenue would be acquired to allow for a smoother curve.

We are concerned that these alternate designs will pave the way for zone changes that would allow for non-industrial uses to take away capacity originally provided for freight mobility. Several of these alternate designs have the potential to open up the industrial waterfront to residential and commercial development. This concern was voiced during the I-5 Trade and Transportation Partnership and is referenced in Section VI B1 i (1-4), Final Strategic Plan for the Corridor June 2002, which recommended managing growth to ensure that the expected life span of the I-5 investments are not shortened and scarce industrial land is not converted to commercial uses.

Finally, the Vanport wetlands developed by the Port as mitigation lie southwest of the interchange and may be impacted by the "southern realignment." The extent of the impact is unknown but significant additional mitigation will be required to address them.

L-017-004

West Hayden Island

Recognizing the need for Portland's marine facilities to meet forecasted trade growth, the Port Commission in 1993 directed Port management to acquire West Hayden Island (WHI). The transaction was completed in 1994. The 825-acre site is adjacent to the Columbia

L-017-003

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

As discussed in Chapter 2 (Section 2.7) of the FEIS, working with this advisory group, the CRC project team conducted studies that analyzed the traffic operations, property impacts, and potential environmental effects for a range of potential interchange designs. The Marine Drive interchange design included in the LPA that is analyzed in the FEIS was developed with this stakeholder advisory group to balance many competing interests, including freight mobility, property impacts to nearby properties, and environmental impacts. More detailed information regarding this process and its outcome is available in the Marine Drive Interchange Alignment Recommendation Process: Final Summary Report and Stakeholder Recommendation, available online in the project's electronic library at www.columbiarivercrossing.org or by contacting the project office.

L-017-004

Thank you for taking the time to submit your comments on the I-5 CRC DEIS. We appreciate the close coordination that we have had with the Port of Portland, as well as with Hayden Island residents. The arterial connection is included in the updated cumulative impacts list of foreseeable projects, included in Chapter 3 (Section 3.19) of the FEIS.

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L-017-004 River navigation channel, in close proximity to the main lines of both the Union Pacific and Burlington Northern Santa Fe (BNSF) railroads and the interstate highway system, making it ideal for deep-draft marine cargo facilities.

The Port has retained the property in marine strategic reserve status. The timing of the Columbia River Crossing project and the East Hayden Island Plan helped trigger the Port's request that the City of Portland undertake a process leading to annexation of WHI for a combination of industrial sanctuary and open space uses.

Consistent with the approach that CRC has taken with East Hayden Island, as well as the proximity to of WHI to the CRC study area, the same consideration must be given to the potential WHI development and associated infrastructure improvements. These improvements include an arterial connection between WHI and Marine Drive, as well as associated rail access improvements. Integrating these two efforts provides a unique opportunity to address how WHI traffic will be served and if an additional access to the Island will be coordinated with the overall CRC planning effort. Preliminary traffic modeling suggests that a new arterial connection would serve both new WHI development as well as broader Hayden Island traffic in order to make transportation and economic sense.

The Port recommends that the future development of West Hayden Island, including an arterial bridge connection and associated rail improvements, be reflected in the cumulative effects chapter as reasonably foreseeable future projects.

L-017-005 Marine Navigation

Within the I-5 Trade Corridor, I-5 intersects with the Columbia River, connecting the Interstate system with deep water shipping, upriver barging and two water-grade transcontinental rail lines. The current I-5 bridge, both due to the clearance issues and the proximity to the BNSF rail bridge located less than a mile downstream, is considered to be one of the most dangerous navigational hazards on the Columbia River. The Port supports a replacement bridge design high enough to eliminate the need for bridge lifts. In addition, the replacement bridge design should provide better alignment with the primary shipping channel and the BNSF rail bridge swing span. To the extent possible, the replacement bridge should also provide a wider pier design to accommodate more modern marine vessels.

L-017-006 Number of Lanes

One of the six problems the CRC project seeks to fix is the safety and vulnerability to incidents within the study area. Close interchange spacing, short off and on ramps, vertical grade changes and narrow lanes and shoulders are examples of the many highway design features that do not meet current standards and contribute to the high number of incidents that impact the flow on this stretch of the interstate. We recommend that the project be sized to include three through lanes and up to three auxiliary lanes for merging and weaving to address existing safety and future traffic growth in the corridor.

L-017-005

As discussed in Chapter 3 (Section 3.2) of the DEIS, the Columbia River and the North Portland Harbor are designated Federal Navigable Waterways, and therefore the U.S. Coast Guard must approve construction or alteration of the I-5 bridges. During hours where bridge lifts are restricted (weekdays, between 6:30 and 9:00 a.m. and between 2:30 and 6:00 p.m.), vessels must either wait or make relatively sharper turns in a short stretch of river and use channels that may have lower height clearance, narrower width, or shallower depths, which represents a safety hazard. The project team, in consultation with the U.S. Coast Guard, established a vertical minimum of 95 feet of clearance so that new structures could be built without a lift-span. Higher vertical clearances would have violated restricted airspace for flight navigation. Under the No-Build Alternative, the lift span restrictions would continue to cause delays and potential hazards to river traffic. The CRC project, as proposed, will require fewer piers, creating less of an obstacle to river navigation than either the existing crossing or the supplemental crossing. Taller vessels would not be restricted by the hours of lift-span operation and would not have to navigate a difficult path around the lift-span channel.

L-017-006

Following the selection of the LPA in July of 2008, the CRC Project Sponsors Council (PSC) was developed to provide recommendations to the project on a variety of issues, including the number of add/drop lanes over the river crossing. Over the course of several months, PSC was provided with operational characteristics and potential environmental impacts of 8-, 10-, and 12-lane options. These technical evaluation criteria included, but were not limited to, traffic safety, congestion, traffic diversion onto local streets and I-205, regional vehicle miles travelled, transit ridership, regional economic impact, effects to neighborhoods, and protected species and habitats. In additional to the technical information, PSC received input from CRC advisory groups and

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L-017-007

Tolls

We appreciate the work the CRC project team has done on the potential impacts of implementing a toll on the I-5 crossing and the related impacts on parallel facilities. We are currently working with the Oregon Department of Transportation Region 1 staff to develop a design for the Airport Way/I-205 North Bound ramp, an assumed project in the Cascade Station EIS, which is planned for construction by 2014. Due to the inter-relationship of I-205 with I-5 and the potential diversion, we will want to coordinate our traffic design assumptions for that project with the CRC final traffic design assumptions and we request that the Departments of Transportation for the States of Oregon and Washington continue to monitor impacts to parallel facilities, like I-205, particularly in a scenario where I-5 is tolled and I-205 is not.

Thank you for your consideration of these concerns.

Sincerely,

Bill Wyatt
Executive Director

reviewed public comment submitted to the project and obtained during two public Q&A sessions in January 2009 regarding the number of lanes decision, as well as hearings conducted by Portland City Council and by Metro Council. In August 2010, the PSC voted unanimously to recommend that the replacement bridges be constructed with 10 lanes and full shoulders. For more information regarding the number of lanes decision making process, see Chapter 2 (Section 2.7) of the FEIS.

The proposed new lanes are add/drop lanes (i.e., lanes that connect two or more interchanges), which are used to alleviate safety issues associated with the closely spaced interchanges in the project area, and accommodate the 68 to 75% of traffic that enters and/or exits I-5 within two miles of the Columbia River.

L-017-007

Traffic modeling indicates that tolling I-5, but not I-205, would divert some traffic to I-205 although most trips would remain on I-5. However, under existing conditions, trips already divert to I-205 and would continue to do so under No-Build because of the unreliability of, and congestion in, the I-5 corridor. With the CRC improvements to I-5, many of those diverted trips would shift to I-5 because it would be a shorter and more reliable trip than I-205. Tolling the I-5 crossing causes some trips to shift to I-205 in order to avoid the toll. The net difference in the number of trips crossing on I-205 is only slightly higher with the CRC project than without it.

With few exceptions, federal statutes do not permit tolling of an existing interstate highway without associated improvements. FHWA does have pilot programs that allow state departments of transportation to apply for the approval to toll a facility. The project sponsors are not proposing to toll the I-205 crossing as part of the CRC project. It is possible that a toll could be placed on the I-205 crossing in the future separate from the CRC project. Section 3.1 of the DEIS and FEIS discusses the effects of

the project on traffic levels in the I-5 and I-205 corridors.

In addition, tolling prior to or during construction can be used to manage demand and begin collecting the revenue. This is not currently proposed but could be implemented if approved.