From:	Todd Horenstein
То:	Draft EIS Feedback;
CC:	
Subject:	Draft EIS comments
Date:	Tuesday, July 01, 2008 3:57:51 PM
Attachments:	CRC DRAFT EIS Comments 1July 08.doc

Greetings,

**L-018-001** Attached are comments from Vancouver Public Schools pertaining to the Draft Environmental Impact Statement for the Columbia River Crossing Project.

The School District appreciates the opportunity to submit comments and looks forward to further involvement as the project progresses.

Thank You.

Todd Horenstein, AIA Assistant Superintendent Vancouver Public Schools T. 360-313-1040 F. 360-313-1041 todd.horenstein@vansd.org

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# 1 of 3 L-018-001

The Vancouver School District submitted a comment on the Draft EIS that was primarily focused on the benefits and potential negative impacts of the high capacity transit system on the school system and its students. A representative of the district was a member of the Vancouver Working Group (VWG) which developed recommendations for design of the light rail extension in Vancouver. The VWG met 13 times from 2009 to 2010.

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July 1, 2008

Columbia River Crossing <u>DraftElSfeedback@columbiarivercrossing.org</u> 700 Washington Street, Suite 300 Vancouver, WA 98660

L-018-002 Thank you for providing an opportunity to comment on the Columbia River Crossing (CRC) Draft Environmental Statement (EIS). As you may know, Vancouver Public Schools spans many zip codes throughout the CRC Corridor, serving approximately 22,000 students and employing more than 3,000 people. We have 132 school busses transporting at least 14,000 regular education students and special needs students per day. The CRC will affect our students, families, employees and operations in various ways.

The Vancouver School District is a proponent of community initiatives that strengthen our diverse economy, provide family wage jobs, and promote a desirable quality of life throughout the region. These conditions improve neighborhoods and help our community sustain the public infrastructure. We believe the CRC project supports these initiatives.

L-018-003 In addition to the benefits a new bridge and/or high capacity transit (HCT) could bring to the local and regional economy, we also recognize several key big picture issues that we would like the CRC team address. Potential impacts on K-12 school sites within the project area include increased traffic, pedestrian and school bus stop safety, and general safety/security for our students who may use the HCT system/stops/terminus. HCT systems provide significant value for commuters, including students. However, inappropriate use, including the potential for youth criminal activity to become more mobile, presents a new dynamic for schools and neighborhoods. Although each of the terminus options impacts school sites, Kiggins Bowl and Lincoln sites are a primary concern due to their immediate proximity to Discovery Middle School (grades 6-8), Vancouver School of Arts and Academics, (VSAA, grades 6-12), and Kiggins Bowl, the district's shared athletic/events stadium. Although these terminus options provide convenient access to these district and community facilities for scheduled purposes, safety/security impacts from some transit ridership should be considered and mitigated to the greatest possible extent.

L-018-004 The following concerns and suggestions for further consideration are a result of our review of the CRC Draft EIS.

Safety and security at the stops and terminus is a significant concern. The identified terminus locations are relatively close to multiple school campuses. Schools, by their nature, often become gathering places for nonschool or community scheduled activities. Improving access to school sites is beneficial, however, using the new transit system to access school sites also may encourage undesirable activity. A comprehensive safety analysis of the options should be conducted with the opportunity to learn from Portland's experiences such as its rider advocate program. On-site monitoring in the trains/busses and stations is essential, not only for physical safety but also for fare checks so riders are vested in the trip and not traveling without purpose. The safety plan analysis should identify and include an expansive response area beyond the terminus to address the impact on school sites. Ideally, an on-site security post at the station open 24/7 would be established to prevent unwanted or illegal activities at a vacant structure after hours.

## 2 of 3 **L-018-002**

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

### L-018-003

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 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 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. The project team has developed a security plan for the transit component of the project, which outlines a variety of potential safety measures, including working with local government to develop supportive land-uses near transit stations, 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.

Regarding alignment specifically, the light rail alignment will not include a

Easy access to I-5 and the impacts associated with accessing the parking facilities via neighborhood streets should be analyzed further.

- Pedestrian safety, particularly where children are present, requires careful consideration of L-018-006 existing sidewalks, crosswalks and safe routes to schools given increased traffic in and around the stops and terminus. Impacts on nearby schools and school bus stops should be assessed thoroughly with the safety of our young people in mind.
- Certain educational benefits may be derived through an effectively designed and efficiently L-018-007 operated HCT system. Combining resources to reduce trips and providing transit service in the areas where traffic is expected to increase, thereby reducing our carbon footprint, can help teach children to be responsible stewards of the environmental by using public transportation. Measuring these outcomes to the extent possible may be a worthwhile analysis.

Thank you for the opportunity to submit feedback on the CRC Draft EIS. We would be glad to assist with the consideration that is needed to address each of these issues as the combined CRC, HCT and LPA decision process moves forward.

Sincerely,

Steven T. Webb, Ed.D. Superintendent

- Increased traffic at a park and ride or terminus could exacerbate an already heavily traveled area. L-018-005
- terminus at Kiggins Bowl or Lincoln. Light rail will extend from the Expo Center MAX Station in Portland to a station and park and ride at Clark College in Vancouver.

#### L-018-004

3 of 3

Safety and security are high priorities for C-Tran and TriMet. Though studies show that crime rates at transit stations are directly linked to the amount of crime in the surrounding neighborhoods, CRC, C-TRAN and TriMet are partnering with local jurisdictions, police and neighborhoods to design, implement and operate a safe and secure transit system. The project team has developed a Safety and Security Management Plan for the transit component of the project, which outlines a variety of potential safety measures. These measures include working with local governments to develop supportive land-uses near transit stations; enforcing fare payment; installing closed-circuit TV at light rail stations, Park & 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.

Since publication of the DEIS, the LPA was adopted with the Clark College MOS terminus alignment which reduces the potential impact of light rail travelling near schools.

#### L-018-005

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 and Columbia – are located adjacent to major thorough fares (I-5 and SR 14). The Mill 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 (70%-95%) would access the Park and Rides from major roads including I-5, SR 14, SR 500, Mill Plain and

Fourth Plain, not local streets. The Lincoln Park and Ride is not part of the LPA.

## L-018-006

Thank you for taking the time to submit your comments on the CRC DEIS. The LPA will include modern bicycle and pedestrian facilities that would accommodate more bicyclists and pedestrians, and improve connectivity and safety for many local streets. While this project is not specifically scoped to provide safe bicycle and pedestrian routes to schools, it is likely that students and other citizens will benefit from the bicycle and pedestrian improvements associated with the project.

# L-018-007

The project team has not attempted to measure the educational value of the proposed light rail system, however, the potential for educational opportunities is appreciated and encouraged. Chapter 3 (Section 3.19) of the DEIS summarized the results of the GHG emissions and climate change analysis conducted for the DEIS alternatives. This analysis has been updated for the LPA, and is found in Chapter 3 (Section 3.19) of the FEIS.