



July 1, 2007



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Hand Delivered
Columbia River Crossing

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

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

Dear Columbia River Crossing Sponsors and Staff:

B-048-001

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

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

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

B-048-002

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

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B-048-001

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

B-048-002

Following the receipt of this letter, CRC project staff met with Gramor Development representatives two times, in September of 2008 and in January of 2009, to answer questions, provide information, and establish an open line of communication between CRC staff and the developer. The CRC project is not expected to affect the site of Gramor's planned development on the Columbia Waterfront property.

B-048-002 (such as specific design details and mitigation) be addressed in writing to Gramor Development Inc.'s head office at the address below via registered mail thirty (30) days prior to any final decision making.

Mailing Address:

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

B-048-003 **Comments/Questions**
 The following information outlines our comments and questions related to probable significant adverse environmental impacts and mitigation measures addressed in the DEIS. We have focused specifically on areas where we believe additional information and analysis are required in the Final Environmental Impact Statement (FEIS) for impacts to be fully identified and mitigated. We have summarized our comments about probable significant environmental impacts and they are followed by questions. We would appreciate your considered response to each general DEIS comment and questions.

B-048-004 **1-00 CRC Project Schedule/General Comments:**
 The Columbia Waterfront project has been planned and will be permitted during 2008/2009. The CRC project has the potential to impact this project significantly. In the FEIS for the CRC project please address impacts and mitigation of the timing of the CRC construction process on the Columbia Waterfront project.

B-048-005 **1-01** Could you please advise as to the latest project schedule (in circulation as of July 1, 2008) and thereafter agree to update Gramor Development, Inc. via registered mail within (48) hours of each and every subsequent plan change commencing July 1, 2008?

B-048-006 **1-02** The CRC bridge schedule appears to be running parallel to Gramor Development, Inc.'s waterfront project, considering both projects what plans does CRC have to ensure site accessibility for both projects?

B-048-007 **1-03** Considering CRC / Gramor Development, Inc. projects running parallel, what concerns does CRC have as to the supply of manpower, equipment and materials and plans to alleviate potential shortfalls in any discipline?

B-048-008 **1-04** What plans does CRC have for providing an effective interface between the bridge crossing project and Gramor Development, Inc.'s Columbia Waterfront project?

B-048-009 **2-00 CRC Staging Area(s):**
 The Columbia Waterfront project is currently being planned for consistent with the adopted VCCV Plan and permitting will begin prior to completion of the CRC FEIS. The Columbia Waterfront project is located immediately west of potential construction staging for the CRC project. Impacts and potential mitigation of construction staging on

B-048-003

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

B-048-004

Given the importance of the waterfront development, the project team has worked to avoid and/or minimize impacts near to it. When impacting the development is unavoidable, the CRC project team will work with you to coordinate detours, noise, and other construction related impacts. The FEIS is not meant to be able to clearly identify all construction related impacts. In fact, a project can not be developed further than 30% design during the NEPA process.

B-048-005

We can not commit to registered mail updates. However, the CRC project has had additional meetings with Gramor Development since the DEIS and continues to strive to coordinate the on-going development of the project with all stakeholders.

B-048-006

Construction of the CRC project would begin in 2013 at the earliest. The project may use a parcel adjacent to the Waterfront development for construction staging, but this use is not expected to interfere with the construction of the Waterfront development.

B-048-007

CRC project construction would begin in 2013 at the earliest. Project staff does not foresee any shortfalls in the supply of manpower, equipment, or materials for project construction.

B-048-008

We have enjoyed working through these issues with yourself, the City of

B-048-009

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

- 2-01 On the Washington State side please identify site the primary construction staging area?
- 2-02 How much space will the primary staging area consume?
- 2-03 Are there other construction staging areas, and if so how large are they and what is their location in proximity to the primary staging area?
- 2-04 Where are the planned entry and exit points for the primary and other construction staging area(s)?
- 2-05 Do the planned construction staging areas include access from the river?
- 2-06 Can you provide layouts of the planned construction staging areas?
- 2-07 What are the projected impacts of CRC construction staging effect on surrounding properties?
- 2-08 Specifically related to Gramor Development, Inc.'s Columbia Waterfront proposed development, and what are the impacts of CRC construction staging areas on this site, including the 1900 feet of shoreline?

B-048-010

- 2-09 Acquisitions Technical Report reads "...one hotel, one office/professional services building..." Can you confirm identity of these buildings as Red Lion Hotel at the Quay and Columbia Executive Building?
- 2-10 Acquisition Technical Report reads: "...if the pre-casting construction technique is used, desirable site characteristics are likely to include:
- A large (at least 15 acres) open site suitable for heavy machinery and casting of bridge segments,
 - Waterfront property with access for barges to convey material to the construction zone, and..."
 - Are we correct in assuming that the aforesaid (15) acres includes the area currently occupied by Red Lion Hotel at the Quay and Columbia Shores Executive Building?
- 2-11 Does the primary staging area require any additional land west of I-5 Bridge (Washington side) beyond the Red Lion and Columbia Shores Executive Building and if so to what extent?

Vancouver, the Port of Vancouver and others. The interface in this area is critical to the viability of your project and the redevelopment of the Red Lion at the Quay property. Currently a system of roundabouts has been planned. These provide good traffic flow as well as unique urban design opportunities. Please refer to Chapter 2 of the FEIS for details regarding these designs.

B-048-009

Five sites have been identified in the FEIS as possible locations for construction staging or casting for the CRC project. Three of these sites are located in Washington; two within the Port of Vancouver complex and one located immediately adjacent the the I-5 bridge. An additional two sites are located in Oregon; one in Gresham and one on Hayden Island immediately adjacent to the I-5 bridge. These sites vary in size from 3 to 95 acres, and would require varying degrees of preparation in order to be used for construction staging or casting. One of the Port of Vancouver sites or the Gresham site could provide access to the river for barging large bridge components, but their use would depend on the bridge construction method that is ultimately chosen. Please see Chapter 2, Section 2.3.3 for more detail on these possible sites.

One or more of these sites may be selected by the contractor to use, or alternately, the contractor could choose a different site. Given that a specific site has not been identified for the contractors use, detailed layouts of the site and traffic routing plans are not yet available.

The potential impacts of these sites on surrounding properties and the environment are described in each section of Chapter 3 of the FEIS.

B-048-010

The parcel containing the Red Lion at the Quay Hotel and Centennial Conference Center has been identified in the FEIS has a full property acquisition, resulting the displacement of the uses on the parcel. It is not

- B-048-011** 3-00 **Energy/Utility Requirements:**
 The Columbia Waterfront project will be a significant extension of downtown Vancouver consistent with City plans and will result in a multi-year, phased development. It is essential that utility access is retained during and after construction. The DEIS does not address impacts to or mitigation for the utilities required for construction of the Columbia Waterfront project which will be constructed concurrently with CRC. Please further address impacts and mitigation measures in the FEIS.
- 3-01 Can you inform us of any planned utility hook-ups for construction staging areas and show supply points on an accompanying map or plan?
- 3-02 What steps has/will CRC take to ensure availability of a sufficient amount of utility supplies, for the duration of construction, based on potential of CRC/Gramor Development, Inc.'s projects proceeding/peaking in tandem?
- B-048-012** 4-00 **Columbia Waterfront Property Access:**
 The Columbia Waterfront property is bounded to the north by the existing Burlington Northern/Santa Fe Railroad berm. The Columbia Waterfront project is being carefully designed and phased consistent with the Port of Vancouver, City, and BNSF improvements to the railroad and underpasses at Esther and Grant Streets. On-going access to the site by Columbia Way is critical. The DEIS does not indicate whether access to Columbia Way will be restricted during construction of the CRC project. Any restriction to Columbia Way access during construction of the CRC project would result in a significant adverse environmental impact to construction and land uses at the Columbia Waterfront property and should be analyzed in the FEIS. In the FEIS, please also address the impacts of CRC construction staging on vehicle and emergency vehicle access to the Columbia Waterfront property.
- 4-01 Can CRC provide confirmation that unhindered access to Columbia Street and the Columbia River Waterfront redevelopment area is assured open for duration of CRC project?
- 4-02 What measures can CRC put in place to ensure 24/7/365 access for emergency services, construction personnel and vehicles of all descriptions to Gramor Development, Inc.'s waterfront site?
- B-048-013** 4-03 Can CRC guarantee Gramor Development, Inc. unhindered access to the full 1900 feet of shoreline on the Columbia Waterfront site?
- 4-04 Can CRC guarantee that existing City-owned marina and associated dock and moorings will remain accessible to Gramor Development, Inc. for 24/7/365 operation for the duration of CRC's bridge project?
- 4-05 Does CRC know of any impediment to Gramor Development, Inc.'s potential use of Columbia River on/off loading (e.g., barge traffic) during CRC's project duration?

expected that the Columbia Shores Executive Offices would be displaced by the project.

The site of the Red Lion at the Quay Hotel has been identified as a possible construction staging location. This site would not be large enough to accommodate the casting of large bridge components, and therefore has not been identified as a possible location for a casting yard. It is not expected that this site would extend beyond the existing location of the hotel and conference center. Please see Chapter 2, Section 2.3.3 for more detail about this site.

B-048-011

The project team, through coordination with the utility owners and construction staging planning, will develop a Conceptual Utility Relocation Plan that indicates how utilities will be relocated, where they will be relocated to, how much the relocation will cost, and who is responsible for the relocation (i.e., the DOT or the utility owner). This plan will also propose a schedule for when the utilities should be relocated in coordination with the construction to minimize any potential temporary impacts to utility services. The project team will also work closely with the utility owners to ensure that any temporary outages are communicated to their customers.

B-048-012

Columbia Way has been identified as a detour route for traffic exiting or entering SR 14 from downtown Vancouver during the reconstruction of the I-5/SR 14 interchange. As a detour route, maintaining movement along Columbia Way will be important. However, reconstruction of Columbia Way and the waterfront trail, demolishing the existing structures, and other activities will require at least short term closures of Columbia Way.

- B-048-014** 5-00 **Transit Alignment:**
 The Columbia Waterfront project will provide dense mixed-use residential and commercial development. Residents, employees and visitors will require access to transit facilities. The DEIS provides analysis of transit alternatives including a transit stop at 7th Street and several potential termini. The FEIS should include further analysis of the preferred alternative transit stops, termini and impacts on surrounding land uses including the Columbia Waterfront project, and the connectivity of LRT with a local bus or streetcar system (tie in points, likely routing, etc.).
- B-048-015** 5-01 Alternative 3 includes light rail which we believe will provide the appropriate form of public transit to downtown Vancouver.
- 5-02 Gramor supports light rail transit alignment and we advocate the smallest footprint and cross section possible, can you confirm the light rail choice and advise details of footprint and cross section?
- B-048-016** 5-03 Appropriate transit stops should be located in downtown Vancouver. Transit stop placement is essential to serve existing and proposed development, can you confirm that the first stop in downtown Vancouver will be as shown on 7th Street?
- B-048-017** 5-04 As to the proposed Kiggins Bowl transit terminus, this site is considered essential in enabling as many people as possible to have transit means to the Gramor Development, Inc. waterfront development. Can CRC confirm Kiggins Bowl site as the chosen transit terminus?
- B-048-018** 5-05 Can CRC confirm that transit alignments/stops will be designed to allow for future integration with a secondary downtown transit system such as a streetcar?
- B-048-019** 5-06 As to the provision of an Aerial Guide Way Easement, as a neighboring property owner our request is for CRC to supply information and related plans for such an easement.
- B-048-020** 6-00 **Acquisitions/Easements and Airspace Rights:**
 The DEIS does not clearly identify the extent and exact location of property required for acquisition, easement or air rights for the CRC project in the vicinity of the Columbia Waterfront property. Requirements for acquisition or easements of any portion of the Columbia Waterfront property would be significant since the site has been planned for and will be permitted for dense mixed use development which is consistent with and required by the City of Vancouver Comprehensive and Vancouver City Center Vision Plans. Please address the impact of acquisitions and easements and airspace rights on surrounding land uses in the FEIS.
- B-048-021** 6-01 Extract from CRC Technical Report: "Airspace Rights and Subsurface Easements:
 "As the construction plan is developed, the project will need to identify all locations where subsurface easements would be required. A temporary easement conveys certain

B-048-013

The CRC project team cannot guarantee the exact timing and duration of construction for this project along the Vancouver waterfront, as this will be dictated in part by contractor requirements and funding availability. However, the project recognizes the importance of maintaining access to the waterfront and the existing marina and associated dock moorings, and will attempt to minimize any restrictions to these areas. No specific impediments have been identified for barge traffic and other marine loading and off-loading from the Gramor development site, but it is likely that during certain times of construction of the CRC project adjacent to this site that river traffic will need to be coordinated between the two construction efforts to avoid potential conflicts between vessels and in-water and shoreline work.

B-048-014

The FEIS includes a description of the LPA and associated stations, alignment and terminus in Chapter 2. The impacts of the LPA, including light rail transit are included throughout Chapter 3: Existing Conditions and Environmental Consequences. Specific impacts to surrounding land uses are analyzed in Chapter 3 (Section 3.4) Land Use and Economics.

The CRC Project is focused on providing a high-capacity transit option through downtown Vancouver to Clark College. RTC has completed a High-Capacity Transit System Study which recommends specific high-capacity transit improvements, including light rail, bus rapid transit and bus service improvements that will best serve Clark County residents in the mid-term (by 2030) and long-term (beyond 2030). To view their Final HCT System Study, visit RTC's website at www.rtc.wa.gov. Though these recommendations are designed to connect with CRC transit improvements, they are not part of the CRC project.

Connectivity and impact to existing C-Tran bus routes is addressed in Chapter 2 (Section 2.2) and in the Transit Technical Report.

- B-048-021** | property rights Temporary... easements may be acquired for construction over locally-owned roads, the interstate, or the railroad, while subsurface easements may be required for utility relocation." Considering all such easements whether temporary or permanent, could CRC advise the location together with details of all such plans i.e., present or future?
- B-048-022** | 6-02 Does CRC have plans for requesting easements over the area occupied by Red Lion Hotel and adjacent Columbia Executive Building?
- 6-03 Does CRC have plans for requesting easements over any of the Columbia Waterfront property?
- 6-04 Assuming CRC has plans for easements as outlined in 6-02 and 6-03 can you forward a copy of such plans to Gramor Development, Inc.?
- B-048-023** | 6-05 Considering mid point of the 263' wide primary navigation channel in the Columbia River as designated by USCG and moving north from said point (in direction of Vancouver shore line) can you provide in increments of 50' for the next 1,000':
- a) Under the bridge soffit height?
- b) Under the bridge soffit height over land and designate point from which said measure taken?
- c) State maximum bridge height(s) over land and measurement point that constitutes the maximum?
- B-048-024** | 7-00 **Recreation/Marina/Columbia Waterfront Trail:**
 The existing marina/dock east of the Columbia Waterfront property is a significant recreational amenity. The Columbia Waterfront project includes plans for new recreational facilities including a trail along the shoreline. The DEIS indicates that the CRC project may result in impacts to the marina and indicates that a new facility could be developed. The DEIS does not include analysis of the location and impacts of new marina facilities or connectivity between the to the existing waterfront trail to the east of the I-5 bridge and the proposed trail along the Columbia Waterfront property to the west. These items should be analyzed in the FEIS.
- B-048-025** | 7-01 How does CRC plan to protect existing Columbia waterfront trail during project duration?
- 7-02 Does CRC have plans to divert existing Columbia waterfront trail under the new bridge?
- 7-02 Can you supply details on Columbia trail connection plan?
- B-048-026** | 7-03 Extract from CRC Technical Report: "...Purchase or build a marina and build new slips:" Does CRC anticipate leasing or purchasing the existing marina, identified as being some 200 yards west of the I-5 steel bridge on Washington side of Columbia River and adjacent to Gramor Development, Inc. property?

B-048-015

Thank you for your comment. 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. Light rail with the Clark College terminus was selected as the preferred form of high-capacity transit. For further description of the light rail alignment please see Chapter 2 (Section 2.1) of the FEIS.

B-048-016

Both current and future land use is one of the criteria used to determine the locations of proposed transit facilities. Other considerations include traffic impacts, property impacts, and overall transit operations. The five proposed stations will support current and planned residential and commercial development. As an example, the Clark College terminus station will serve a community and senior center, a community college, and the Veterans Administration campus.

Current plans show light rail stations in the following locations: a station near the center of the street on Washington between 5th and 6th Streets; a pair of stations (one northbound and one southbound) on the Washington-Broadway couplet; one pair of platforms near Evergreen Boulevard; and one pair near 15th Street.

For more information, please see Chapter 2 of the FEIS.

B-048-017

The Clark College transit terminus was chosen by project sponsors as part of the LPA in July 2008, as it was deemed to most effectively balance the cost of the project and the projected community benefits.

RTC's Clark County High Capacity Transit System Study, published in December of 2008, analyzed specific high-capacity transit improvements

acquired from the Red Lion at the Quay and the hotel displaced, as described in the above responses.

B-048-023

Current bridge engineering plans are preliminary and will be revised prior to final engineering so any data provided will change prior to construction. The CRC project will provide, at minimum, a navigation channel 300' wide and 95' high (0 CRC=5.28' NAVD88).

The process and size of the navigation channel was determined in consultation with the US Coast Guard. For more information please see the Navigation Technical Report.

B-048-024

The marina located at the Vancouver Landing at Terminal One is not expected to be impacted by the CRC project. The marinas referred to in the DEIS are those located in North Portland Harbor.

B-048-025

Bicycle and pedestrian access along the Waterfront Trail beneath I-5 will be maintained as much as possible during project construction. However, construction of the new bridges, Columbia Way and Waterfront Trail, demolition of the existing bridges, and other construction activities may require short term closures of access along the trail. In the event of such a closure, a detour will be provided.

It has not yet been determined exactly how the Waterfront Trail will be aligned beneath the new bridges. The plan for this trail will be developed in close coordination with the City of Vancouver.

B-048-026

Please see response to comment B-048-024.

B-048-027

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