


From: [Daniel Swink](#)
To: [Draft EIS Feedback](#) 
CC:
Subject: I-5 DEIS Comments
Date: Tuesday, July 01, 2008 9:10:46 PM
Attachments: [2008-6-30 I-5 CRC DEIS Comments.doc](#)

Attn: Heather Gundersen,

P-0799-001 Please see the attached word document that has my comments for the I-5 Columbia River Crossing DEIS.

I have also sent this by fax today, but I am not sure if I can still get a postal letter postmarked with today's date.

Please verify for me that my comments have been entered into the DIES record and will be responded to.

Thank you very much,

Daniel Swink
360-852-6688

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

P-0799-001

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

Columbia River Crossing Project
 C/O Heather Gundersen, Environmental Manager
 700 Washington Street, Suite 300
 Vancouver, WA 98660

RE: I-5 CRC DEIS Comments

P-0799-002 I am a resident of the Rosemere neighborhood in Vancouver Washington that has been commuting to Portland to work for the majority of the last 18 years. I will also mention that I have experienced living with and commuting with (among other Washington highway and bridge projects); the entire construction of Interstate I-90 (from 24 miles plus east of and to Seattle), and the entire construction of the West Seattle Bridge.

I have the following comments regarding the Draft Environmental Impact Statement (DEIS) for the I-5 Columbia River Crossing Project:

P-0799-003 1) Public Comment Period
 a. The allotted time period for public comment is woefully inadequate for the public to; receive the DEIS, review its contents and the supplemental list of DEIS Errata and Clarifications, and then give informed feedback. This project is a major undertaking and requires careful review. The 6,105 plus pages of the DEIS has been years in the making and to expect the public and other interested parties to turn around and give good feedback in only two months is absurd.

P-0799-004 b. Having the final Columbia River Crossing (CRC) Task Force Meeting reviewing summaries of public comment and advancing project along before finishing the public comment period is premature and irresponsible and alienates the public.

P-0799-005 2) Financial Analysis
 a. Funding for this project is in serious question. Determining how, what, where, and when parts of the project could be affordably done in phases at this time should be carefully and thoroughly looked into before advancing the project. This approach could provide provisions to expand the project as funding allows, thereby reducing strains on taxpayers and the funding of other needed projects.
 b. Seattle's Light Rail Transit (LRT) project went five billion dollars over the voter approved budget for only the first portion of the project and the project is years behind schedule, and Portland's West Side LRT "MAX" line project was estimated to cost \$395 million and ended up costing \$963 million. What measures and guarantees are in place to prevent similar cost overruns and set-backs from burdening the tax or toll payers and jeopardizing the completion or future phase expansion of this project?
 c. Recent project testimony by experienced and informed transportation and government officials have made it known that the commuters and taxpayers of Clark County would probably end up having to pay for more than a third of the overall project cost. How can the project insure that Clark County doesn't get burdened with paying more than its fair share of the project that primarily serves the economy of the entire west coast?
 d. Since it is not currently known how the majority of the project will be funded, how can the scale of this project insure that all the necessary and unforeseen mitigation expenditures will not get left out of the project allocations or finished construction?

P-0799-002

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

P-0799-003

NEPA requires a comment period for a DEIS to be no less than 45 days. Prior to issuing the CRC DEIS, FTA, FHWA and the other project Co-Leads (WSDOT, ODOT, RTC, Metro, TriMet and C-TRAN) decided to extend this to 60 days in order to allow additional time for review and comment. Section 6002 (g)(2)(A) of SAFETEA-LU (Safe, Accountable, Flexible, Efficient, Transportation Equity Act: A Legacy for Users), the federal transportation reauthorization bill, established a comment period of "no more than 60 days" for DEISs. FTA and FHWA did not see "good cause" [(Section 6002 (g)(2)(A)(ii))] for extending the current comment period beyond the 60 days that were already being provided.

The DEIS comment period is only one opportunity during the NEPA process for the public, agencies and tribes to review information and provide input. As discussed in Appendix B of the DEIS, over the three years prior to the publication of the DEIS, the project provided opportunities for stakeholders to comment on numerous components of the draft including the Purpose and Need, Range of Alternatives, methodologies for analyzing impacts to various elements of the environment and preliminary findings. Project staff also participated in meetings with neighborhood groups, business organizations, and other potentially affected stakeholders. Strategies for communicating with limited-English, low-income, and minority populations have been developed by, and facilitated through, local communities, the CRC Community Environmental Justice Group (CEJG) and community-based organizations. As an example, CEJG sponsored informal Q&A sessions that occurred during the DEIS comment period. Certain project materials, including information related to the DEIS and associated open houses and public hearings, are translated into Spanish, Russian, and

- P-0799-006** 3) Description of Alternatives
- a. What measures will be taken to offset the income tax being paid to the State of Oregon and other transportation expenses incurred by Washington commuters traveling to Oregon for jobs that would be heavily burdened with the new crossing tolls?
- P-0799-007** b. I **DO NOT** support extending Light Rail Transit into Clark County as part of this project. Any High Capacity Transit (HCT) that is incorporated into Vancouver can have serious impacts on how desirable the preferred livability of the city is and its economic viability, and should be voted on by the public. If HCT is to be a part of this project, then I would support Bus Rapid Transit (BRT) as the current option to be used.
- P-0799-008**
- P-0799-009**
- P-0799-010** c. LRT projects have a history of cost overruns that burden taxpayers and require additional subsidies to construct, operate and maintain. In Seattle, cost overruns and delays of LRT have turned the project into a taxpayer's nightmare and forced utilizing the more reliable bus system while more money is sought from taxpayers to complete the unfinished portions of the LRT project. It also appears that Oregon's interest in pursuing LRT to Vancouver would be to take advantage of further extending the funding and subsidy base to support their system that is not cost effective.
- d. There is not the density of population base in Clark County to support using LRT and make it cost effective. The majority of Clark County's population is closer to the I-205 corridor than it is to the I-5 corridor. It does not make sense to expect people from the east side to come to the I-5 crossing just to use High Capacity Transit.
- e. A 2003 testimony titled "FEDERAL TRANSIT ADMINISTRATION, Bus Rapid Transit Offers Communities a Flexible Mass Transit Option" (GAO-03-729T) was given by the United States General Accounting Office (GAO) and Federal Transit Administration (FTA) to the U.S. Senate committee on Banking, Housing, and Urban Affairs. This testimony states that: "Buses form the backbone of the nation's mass transit systems. About 58 percent of all mass transit users take the bus, and even in many cities with extensive rail systems, more people ride the bus than take the train." The testimony also says that "FTA promotes the Bus Rapid Transit concept with the slogan "think rail, use buses."
- f. The infrastructure and operation associated with LRT use make it more dangerous and awkward for pedestrians, bicyclists, vehicles and other forms of traffic to interface with.
- g. A 2001 report titled "MASS TRANSIT, Bus Rapid Transit Shows Promise" (GAO-01-984) was given by the GAO to Congressional Requesters. This report examined 20 existing BRT lines and 18 existing LRT lines. In this report, the end of the review of System Performance states: "We also found that, in most instances, Bus Rapid Transit was faster than Light Rail in the six cities in our study." The comparison chart in the report shows that BRT was significantly faster.
- h. The 2001 GAO report (GAO-01-984) found that Capital Cost per Mile for BRT could be built for a fraction of the cost of LRT.
- i. The 2001 GAO report (GAO-01-984) shows that Operating Cost per Vehicle Revenue Hour is blatantly lower in five out of six cities studied.

Vietnamese, and interpreters are available at project open houses by request.

In addition, since the DEIS comment period there have been numerous community meetings, open houses, and public hearings by project sponsors, providing more opportunities for public input and comment. In total, as of March 2011, CRC staff have participated in over 900 public events to directly reach over 27,000 people since October 2005.

P-0799-004

The CRC Task Force is an advisory committee, and as such, their recommendation was requested during the formal 60-day public comment period. The LPA was not formally recommended by project sponsors until after the close of the comment period.

P-0799-005

Since 2002, WSDOT has been developing a process of determining cost and schedule estimates, the Cost Estimate Validation Process® (CEVP®), to help deliver major projects. Compared to conventional cost estimating, CEVP® is a risk-based estimating process, iterative in nature, and represents a "snapshot in time" for that project under the conditions known at that time. CEVP® is the expression of project cost and schedule as a range rather than as a single number. Providing cost information as a range accounts for risk factors that might otherwise cause costs to balloon over time. The cost information is given for the year of expenditure and includes everything, even "unknown" issues that may arise. CEVP® is a construction cost estimate tool and does not estimate long-term operations and maintenance costs. WSDOT now mandates all projects over \$25 million use the process. Chapter 4 of the DEIS, and the Cost Risk Assessment included as an appendix to the DEIS, include information about how costs were estimated for the DEIS. See Chapter 4 of the FEIS for more discussion on how project costs were estimated in the CEVP® that was conducted following publication

P-0799-010

j. The 2001 GAO report (GAO-01-984) shows that Operating Cost per Vehicle Revenue Mile for BRT was at a fraction of the cost of LRT for all six cities studied.

k. The 2001 GAO report (GAO-01-984) shows that Operating Cost per Passenger Trip for BRT was lower than LRT for four out of six cities studied.

l. Maintenance costs would also favor BRT over LRT.

m. In constructing BRT, it would not be necessary to include all the final elements before beginning operations; it is possible to phase in improvements over time. Thereby keeping up front costs lower and putting it into operation sooner. In contrast, LRT must be fully completed and tested before starting operation and realizing benefits.

n. BRT systems have the advantage of being more flexible than LRT and can respond to changes in employment, land use, and community patterns by increasing or decreasing capacity or adjusting routes over time. LRT is fixed and can not easily change to adjust to new patterns of housing and employment or other influences.

o. BRT has the ability to operate both on and off a busway or bus lane providing the flexibility to respond to operating problems. In contrast, LRT can become inoperable from a variety of consequences such as; railway obstructions, rail maintenance or repair, weather interference, and electrical failure or power supply outages.

p. BRT lanes could easily provide emergency vehicle access or be used for future alternate uses. LRT track obstruction does not offer this.

q. The Port's Freight Route Delay Analysis regarding signal priority for LRT, shows that the LRT delays to traffic will create livability and economic issues by stopping traffic flow on any of the arterials and streets that LRT crosses. These crossing interruptions would not only have a negative economic impact in impeding freight and traffic flow, but would bring greater noise, congestion and pollution, and would require additional mitigation measures to be put in place.

r. All the overhead electrical structure and institutional control such as fencing and signage that LRT requires would create more clutter of distractions and undesirable eye pollution as well as obscure scenic views and add unwanted bird perches (such as the bird problem on the existing I-5 bridge) that would detract from the quality of life experience in the affected area and commute.

s. Using BRT would also eliminate the EMF emissions exposure associated with LRT.

P-0799-011

t. I would prefer a new bridge that takes advantage of the scenic view and eliminates or minimizes the chronic problem of overhead bird perching issues, if it can be built without over burdening the taxpayers and commuters of Clark County, and without jeopardizing funding for other needed local projects.

of the DEIS.

Please refer to Chapter 4 of the FEIS for a description of the current plans for funding construction and operation of the LPA. This discussion provides an updated assessment of likely funding sources for this project, though it is not common practice to receive funding commitments prior to completion of the alternative selection process. As described in the FEIS, project funding is expected to come from a variety of local, state, and federal sources, with federal funding and tolls providing substantial revenue for the construction.

P-0799-006

Details of the tolling system are still being refined as the project development enters the final design stage. It is currently not anticipated that transit users, bicyclists or pedestrians will pay a toll. Additionally, certain toll discounts or waivers for other groups have been and will continue to be considered. The ultimate decision on any tolling options will be made by both the Washington and Oregon Transportation Commissions.

P-0799-007

Light rail has been endorsed by every local Sponsoring Agency (Vancouver City Council, C-TRAN, RTC, Portland City Council, TriMet, and Metro), whose boards are comprised of the elected leadership of the region.

Annual light rail passenger trips crossing the I-5 bridge in 2030 are projected to be 6.1 million, with daily ridership around 18,700. The travel time for the morning commute by light rail between downtown Vancouver and Pioneer Square in downtown Portland will be approximately 34 minutes. Light rail would travel on a dedicated right-of-way, with more reliable travel times than auto drivers dealing with unpredictable road conditions, traffic congestion, and parking challenges.

- P-0799-012** | u. I have serious concerns about the seismic safety that can be achieved with both the existing bridges and the proposed bridge design replacements. I have heard testimony that there are other bridge designs that would offer better seismic safety than the rigid concrete bridge being proposed. Were other bridge designs eliminated because of having to accommodate the Pearson Airport air space, and are other designs still being considered to alleviate potential seismic damage or structural failure?
- P-0799-013** | v. Surfaces of the bridge, highway and the HCT should be designed to capture; storm water, vehicle fluids and accident spills, and treat them in an environmentally sound way to prevent polluting of river water bodies or ground water.
w. The DEIS should more specifically address at all phases of the construction process how it will prevent the spread of existing ground or river water contamination, and how it prevent contributing more contaminants to ground or river water.
- P-0799-014** | w. Bridge lighting should be designed to minimize scenic view obstruction and not create excessive light pollution and glare.
- P-0799-015** | x. The bridge crossing design should allow for pedestrian and bicycle access at Hayden Island and preferably allow for both a far west side and far east side of bridge exposure to the surrounding view.
- P-0799-016** | y. Regarding a HCT terminus location, I think given the overall cost of the crossing project and lack of funding, that the terminus should be located to minimize both cost and impacts.

z. Regarding a HCT terminus at Clark College, I have strong concerns that this will have serious impacts to the east side of interchange I-5 and Fourth Plain Blvd. It would create more congestion and traffic hazards on Fourth Plain Blvd and increase cut-through or bypass traffic in the Rosemere neighborhood.
- P-0799-017** | aa. Will there be adequate future opportunity for the public be involved and give input on the project changes that occur from the DEIS before the Final Environmental Impact Statement is Approved?

bb. In the DVD format of the DEIS, the Noise Appendix E file objects are not viewable. Is this intentional?

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The CRC project planning for light rail incorporates and supports the principles of the Vancouver's City Center Vision Plan. Downtown Vancouver has seen recent growth in higher density mixed use projects from three to 12 stories in height. In addition, another 4,000 downtown condominiums are proposed or pending as part of new developments. The core of Vancouver has, along with many of the larger corridors such as Fourth Plain Blvd, medium to high density residential development and an urban mix of uses. Transit demand in these areas is quite high, and ridership will increase with the introduction of light rail.

Long-term operation and maintenance of the new light rail line will be funded through C-TRAN and TriMet. For its share of the operations and maintenance funding, C-TRAN plans on having a public vote.

P-0799-008

There will not be a public vote on construction of the various CRC project elements. However, as a public project, it must be approved and funded by the decisions of elected officials who are themselves directly elected by voters. Long-term operation and maintenance of the new light rail line will be funded through C-TRAN and TriMet. For its share of the operations and maintenance funding, C-TRAN plans on pursuing a public vote.

P-0799-009

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.

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

P-0799-010

Following the close of the 60-day DEIS public comment period in July 2008, the CRC project's six local sponsor agencies selected light rail to Clark College as the project's preferred transit mode. These sponsor agencies, which include the Vancouver City Council, Portland City Council, C-TRAN Board, TriMet Board, RTC Board and Metro Council considered the DEIS analysis, public comment, and a recommendation from the CRC Task Force (a broad group of stakeholders representative of the range of interests affected by the project - see the DEIS Public Involvement Appendix for more information regarding the CRC Task Force) before voting on the LPA.

As illustrated in the DEIS, and summarized in Exhibit 29 (page S-33) of the Executive Summary, light rail would better serve transit riders than bus rapid transit (BRT) within the CRC project area. Light rail would carry more passengers across the river during the PM peak, result in more people choosing to take transit, faster travel times through the project area, fewer potential noise impacts, and lower costs per incremental

rider than BRT. Additionally, light rail is more likely to attract desirable development on Hayden Island and in downtown Vancouver, which is consistent with local land use plans.

As described Chapter 3 (Section 3.1) of the DEIS, the operations and maintenance (O&M) costs associated with light rail would be less than those associated with bus rapid transit, largely because light rail operates on electricity while bus rapid transit is dependent on the volatile fuel market. LRT costs approximately \$3.50, or 31%, less than BRT, per incremental rider when comparing both capital and operating costs.

Long-term operation and maintenance of the new light rail line will be funded through C-TRAN and TriMet. For C-TRAN's share of the operations and maintenance funding, it plans on having a public vote. For more information on how O&M costs will be shared between TriMet and C-TRAN, and how C-TRAN may finance these additional costs, please see Chapter 4 of the FEIS.

Planning for safety and security on and around light rail is a top 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 will be designed into every phase of the project.

Examples of safety measures which maybe designed into the project 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-light 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.

P-0799-011

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.

P-0799-012

The Pacific Northwest is a geologically active region. Regardless of which materials are used in bridge construction, the bridge will be designed in accordance with project specific design criteria and current codes to ensure it will withstand seismic forces as described in Chapter 3 (Section 3.17) of the DEIS and FEIS.

P-0799-013

As discussed in Section 3.14 of the FEIS, under the locally preferred alternative (LPA), the amount of untreated impervious road and bridge

surfaces would drop dramatically compared to existing conditions. Section 3.14, as well as Section 3.18, also discuss construction methods that can be used to protect the quality of surface and groundwater from existing contaminants and the introduction of new contaminants.

P-0799-014

The CRC project design for interchanges, roadway elements, transit stations, and other facilities will be context-sensitive and reflect the unique character of the surrounding area. CRC has a 14-member, bi-state Urban Design Advisory Group (UDAG), made up of design professionals and neighborhood representatives. Working closely with project designers, UDAG will attempt to integrate the new facilities with the surrounding community. For example, work has already begun on identifying significant iconography (e.g., symbols, patterns, etc.) that will reflect the Native American communities in the area, early pioneers, and other significant themes in local history. These images will be incorporated into project designs and public art installations.

The project team and UDAG are also addressing a lighting scheme.

P-0799-015

The new 16-foot wide multi-use path would extend to the Marine Drive interchange, connecting to the Expo Center light rail station and the light rail bridge over North Portland Harbor. These new trails would provide safer and more direct bicycle and pedestrian connections than the circuitous paths that exist in and through the Marine Drive interchange today.

The multi-use path design for the portion over the bridge includes an open box that will allow views for the path users. Chapter 2 of the FEIS includes further information about the multi-use path design.

P-0799-016

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.

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.

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

P-0799-017

The Columbia River Crossing project continued to meet with its advisory groups and local community groups to provide project information and collect input since publication of the Draft EIS. A listing of all public events can be found in Appendix B. Future opportunities will exist, including continued discussions with the community on construction and final design. CRC project advisory groups will continue to meet as appropriate to allow project staff to hear from the community about specific design and project development issues. The CRC project continues to maintain an updated and inclusive web site containing maps

and project documents as well as a form for submitting public comments. Email updates will be sent regularly to our project mailing list with new project information. The project will maintain an email address where the public can submit comments and questions. Questions will be responded to by project staff in a timely manner.

File objects in the electronic versions of all appendices were intended to be viewable. Appendix E is a large file with numerous tables. It is viewable on the CRC Web site at:
<http://www.columbiarivercrossing.org/FileLibrary/TechnicalReports/NoiseandVibrationTechnicalReport.pdf>.

Staff replaced any defective DVDs upon request.