

1661 N. Jantzen Ave.
Portland, OR 97217

June 30, 2008



Columbia River Crossing (CRC)
Attn: Heather Gundersen
700 Washington Street, Suite 300
Vancouver, WA 98660

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Hand delivered
Columbia River Crossing

Re: Comments on CRC DEIS

P-0814-001

The purpose of this letter is to express support for Alternative 3 with LRT adjacent to I-5 and provide comments on the DEIS.

In general, I want to voice my concurrence and support of the comments to the CRC on the DEIS from Hayden Island Neighborhood Network [HINooN] and Jantzen Beach Moorage Inc. [JBMI]. These two letters express concerns and comments that I share.

In addition to the comments reflected in the above referenced letters I have the following comments on the DEIS.

P-0814-002

Bridge Type: I do not support an 'iconic' bridge. The Pacific Northwest provides natural visual aesthetics that far surpass any that man may impose. The new bridge structures should be efficient and elegant, and impose minimal visual impact of their own.

P-0814-003

Hayden Island Impacts: The CRC DEIS does not accurately reflect impacts to Oregon housing resulting from displacement of floating homes. The CRC DEIS does not appear to include all applicable U.S. Bureau of Census data for Hayden Island, resulting in two-thirds of the island's population not being included in the poverty, race or any other demographic characterization, and misrepresentation of median home values. The entire demographic profile of Hayden Island needs to be re-done using the appropriate data.

P-0814-004

Economic Technical Report: The sections on Marine Commerce imply that water commerce is currently hindered by the existing bridge structure. The 604 bridge lifts in 2004 included recreational boats as well as commercial vessels. The number needs to be compared to total commercial transits to be informative. The net benefit from the CRC project appears overstated.

P-0814-005

- Section 5.6: Economic Perspective of Marine commerce on the Columbia River is cited but not included in the report.
- Throughout the report, the reference to Hayden Island Master Plan should be changed to Hayden Island Neighborhood Plan for accuracy and consistency.

P-0814-006

Navigation Technical Report. The Navigation Technical Report does not reflect a thorough understanding of navigation through the API. The Navigation Technical Report should provide a basis for evaluating various potential replacement bridge heights and their impacts to navigation. The CRC report appears to assume a main span bridge elevation of approximately 95' [page 4-5] but contains no evaluation of why this vertical clearance was selected. Arriving at a suggested design clearance should have been the objective of the Navigation Technical Report; it should not have been an assumption.

Bridge height affects numerous project-related impacts including, but not limited to, energy consumption, airspace, cost, and aesthetics. The lack of a rigorous vertical clearance requirement assessment results in incomplete evaluation of all these project elements.

P-0814-001

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-0814-002

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 formed a 14-member, bi-state Urban Design Advisory Group (UDAG), made up of design professionals and neighborhood representatives. All UDAG meetings are open to the public to attend and observe. Goals of the UDAG include achieving "design excellence that can be embraced by affected communities and users" and providing "a landmark bridge that is both

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P-0814-006

In addition to the above general comments, the conclusions regarding impacts to navigation in North Portland Harbor are seriously flawed.

The following specific comments regarding the Navigation Technical Report are representative of the types of concerns identified by this commenter.

Specific Comments:

- References to all vertical clearance dimensions need to reference a datum.
- Pg 1-6 Section 1.3.2: References that the replacement bridge alternative will increase safety but there is no information provided regarding existing accident or collision rates in this reach that quantifies an existing problem. The reader cannot gauge the value to navigation from any improvements.
- Section 1.3.4: The North Portland Harbor appears to be confused with the deep draft Columbia River navigation channel on this page and throughout the Technical Report. The federally authorized navigation channel that currently passes under the I-5 and BNSF RR bridges mainstem bridges is the Columbia River between Vancouver-The Dalles project, not the North Portland Harbor [Oregon Slough] project.
- Pg. 2-1, Section 2.2: NOAA Navigation Charts showing the authorized channels should replace the aerial graphic in this section. The graphic should clearly show the delineation of "eastern portions" and "western portions" as referenced in Section 4 of the Technical Report and to which the reader currently has no reference. Correct last line '*North Portland Harbor, also known as North Portland Harbor.*'
- pg 2-3 Section 2.4 A 2006 Boat Survey Technical Memorandum is referenced. Is this the same document as the Boat Survey [Parsons Brinckerhoff, 2004]? Paragraph 2 in Section 2.4 states that the data in the 2006 Boat Survey Technical Memorandum was updated in 2006. There appears to be an error in references in this paragraph.
- Pg 4-1, Section 4.2.1: The reader is given no idea of what is meant by '*eastern portion*' or the '*western portion.*' East and west of what? The Port of Portland facilities referenced in this paragraph [assumed to be Terminal 6] are located on the deep draft federally authorized Columbia River navigation channel, not on the federally authorized shallow draft channel called Oregon Slough or North Portland Harbor. Port of Portland facilities are outside the project's API and have little relevance to navigation in this reach. North Portland Harbor west of the N. Portland Harbor Bridge contains the largest floating home moorage in Oregon [on Hayden Island's south shore] and major marine industrial facilities [Diversified Marine (DM) and Ross Island Sand & Gravel (RISG)]. Both DM and RIS&G require daily vessel trips through this reach for their operations. The reach is also heavily used by recreational boats.
- 4.2.1.1: 2nd paragraph, 1st line: Previous studies have characterized navigation in this reach. The sentence should be changed to read: '*Previous studies performed by the CRC project have not.....*'
- Exhibit 4-4. Remove reference to North Portland Harbor. It is not applicable to the statistics shown.
- Pg. 45, Exhibit 4.6: This table appears to summarize transits of a specific class of vessels using the reach, or those vessels requiring high vertical clearances. It does not summarize all vessels through the reach. The narrative and exhibits need to be corrected to accurately state what Exhibit 4-6 demonstrates.
- Pg 5.2, Section 5.2.2.1: The 2nd paragraph grossly misstates the impact of new bridge structures in North Portland Harbor. The paragraph reads:

inspired and inspiring and fully integrates the design and function of the structure with the urban design elements." Working closely with project designers, UDAG will provide input and guidance on integrating the new facilities with the surrounding community. This work includes identifying significant iconography (for example, symbols and patterns) that will reflect the history of the area, the Native American communities, early pioneers, or other significant themes. These images will be incorporated into an art master plan. Additional discussion of bridge designs can be found in Chapter 2 of the FEIS and in the Visual and Aesthetics Technical Report supporting the FEIS.

P-0814-003

The demographic data presented for the Hayden Island Neighborhood in Chapter 3 (Section 3.5) of the DEIS was taken from the 2000 U.S. Census and cut to the neighborhood boundaries. The U.S. Census estimated a total of 2,071 residents on the Island, which is in line with the population estimate of 2,155 residents conducted in 2007 by the City of Portland for the Hayden Island Planning process. In an effort to more accurately reflect the Island population, the FEIS assessment is based on data from the 2010 Census, the American Community Survey, and a project-specific survey of potentially displaced households. Updated population and demographic information can be found in Chapter 3 (Section 3.5) of the FEIS.

P-0814-004

We have continued to work with the Coast Guard, Ports, and marine contractors. The LPA and its refined designs provide irrefutable benefits to the navigation channel, as documented in Section 3.2 of the FEIS.

P-0814-005

The recent Hayden Island planning effort resulted in two separate plans, the Hayden Island Concept Plan, and the Hayden Island Final

P-0814-006

The proposed North Portland Harbor navigation vertical clearance envelope will meet or exceed the existing clearance envelope. There are no apparent adverse long-term effects to vertical clearance.

Currently vessels traveling between the BNSF N. Portland Harbor RR Bridge and the N. Portland I-5 Bridge are *unrestricted* regarding vertical clearance. The BNSF has a swing span that allows transits of vessels exceeding the bridge's 35' CRD clearance. Therefore, the single impediment to vessels is the existing N. Portland Harbor I-5 Bridge. The construction of new bridges within this reach will add several vertical clearance restrictions not currently experienced by commercial or recreational vessels. The conclusions and impacts in this section of the Navigation Technical Report, and repeated in Sections 6.2.1.1, 8.2.1.1 and elsewhere, are erroneous and need to be corrected.

P-0814-007

As a private citizen living within the API, I do not claim to have reviewed the entire DEIS and all its Appendices and Technical Reports. I have reviewed portions of the DEIS most relevant to my situation. Based on my limited review, I have deep concerns about the overall accuracy of the entire DEIS. I urge the CRC and stakeholder agencies to perform a comprehensive technical review of the conclusions and impacts stated within the DEIS before making further decisions regarding alternatives.

Very truly yours,



Margaret W. [Peg] Johnson
1661 N. Jantzen Ave.
Portland, OR 97217

Plan. These plans are discussed in the Final Environmental Impact Statement (FEIS) Economics Technical Report.

P-0814-006

The project team, in consultation with the Coast Guard, established a vertical minimum of 95 feet clearance, so that new structures could be built without a lift-span. Higher vertical clearances would have violated restricted airspace for flight navigation.

P-0814-007

Extensive technical and public review and input has been included in all phases of the CRC project, from developing a purpose and need statement, screening a wide variety of alternatives, and developing a Draft and Final EIS. A supplemental draft is required if changes to alternatives after the draft are substantial and/ or if there are new significant impacts not previously discussed in the draft and/or there are changes in laws or regulations after the draft. The DEIS identified potential mitigation measures for all potentially significant as well as many non-significant impacts, and the FEIS further analyzes and develops mitigation measures and plans to a higher level of detail and refinement. CEQ NEPA regulations (40 CFR 1502.9(c)) do not require agencies to prepare a supplemental draft EIS just because an FEIS includes refined alternatives and additional information. Such changes are typical and expected in the planning process, and are consistent with CEQ and FHWA NEPA regulations. Between publication of the DEIS and FEIS, FTA and FHWA prepared three NEPA re-evaluations and a documented categorical exclusion (DCE) to complete changes in the project since the DEIS. The NEPA re-evaluations addressed the change in the project from: 1) the 17th Street transit alignment, 2) the composite deck truss bridge type, and 3) all other changes in design between the DEIS and the FEIS. The DCE addressed the impacts from the track work on the steel bridge.

Both agencies concluded from these evaluations that these changes and new information would not result in any significant environmental impacts that were not previously considered in the DEIS. For more information, see Appendix O of the FEIS.