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Columbia River Crossing

ESTHER SHORT NEIGHBORHOOD ASSOCIATION

June 6, 2008

Columbia River Crossing
700 Washington St. #300
Vancouver, WA. 98660

James Correll, Chair
Downtown Appearance and Projects Committee
Esther Short Neighborhood Association
400 W. 8th Street Suite 322
Vancouver, WA. 98660

Subject: Columbia River Crossing
Draft Environmental Impact Statement Review
Conclusions, Recommendations and Conditions

N-022-001 The Downtown Appearance and Projects committee of the Esther Short Neighborhood Association has completed its review of the Draft EIS and Section 4(f) Evaluation for the Columbia River Crossing Project.

Based on our review and ongoing participation in the CRC community outreach process, we hereby recommend selection of Alternative 3 (replacement bridge with light rail) as the preferred alternative.

N-022-002 We also recommend that the light rail alignment be confined to the Washington Street R/W extending north to McLoughlin and then east within the McLoughlin R/W across I-5 terminating at Clark College.

N-022-003 The detailed rationale that places these recommendations in context is presented in the attachment entitled Conclusions, Recommendations and Conditions Regarding CRC Draft Environmental Impact Statement. We would particularly like to draw your attention to the "Conditions" associated with the recommendations. Without these conditions, the selected alternative becomes invalid.

Thank you for the opportunity to comment on this extremely important project. Given the obvious and significant impacts that the project will impose on our neighborhood, it is essential that planning, design, and funding considerations continue to include our direct involvement.

Regards,

Jim Correll

Jim Correll
Chair, Downtown Appearance and Projects Committee
Esther Short Neighborhood Association

Attachment: Conclusions, Recommendations and Conditions Regarding CRC Draft Environmental Impact Statement

Cc: Pat McDonnell, City Manager
ESNA board of directors
ESNA committee chairs
DAP committee members

N-022-001

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.

N-022-002

Following the selection of the LPA in July of 2008, the CRC enlisted the help of community members - residents, business owners, transit-dependent populations and commuters - who had interest in light rail planning to form the Vancouver Working Group (VWG). The VWG met regularly to develop recommendations and provided feedback to the CRC project, the City of Vancouver and C-TRAN on transit alignments, proposed station locations and design, security and park and ride facilities in downtown Vancouver. VWG explored McLoughlin, 16th

Esther Short Neighborhood Association
Downtown Appearance and Projects Committee
Conclusions, Recommendations and Conditions Regarding
CRC Draft Environmental Impact Statement
June 19,2008

N-022-004 For the past eight months members of the ESNA Downtown Appearance and Projects (DAP) committee have participated in multiple Columbia River Crossing (CRC) workshops, attended several neighborhood forums, reviewed extensive CRC project documentation, attended the Southwest Washington Regional Transportation Council's (SWRTC) county-wide high capacity rapid transit planning open house and reviewed the agency's draft plan.

Since the May 2nd release of the DEIS, our DAP committee has been involved in reviewing this document and our members have attended community open houses and informational meetings that have been held by the CRC project team in our community.

At our May 15, 2008 neighborhood association meeting, the Esther Short Neighborhood Association facilitated a panel discussion in which experts from the CRC Project, Tri-Met, C-Tran, SWRTC and the City of Vancouver responded to numerous questions from our membership regarding the various facilities being considered.

Based on the information gained in this process, the DAP Committee has formulated the following Conclusions, Recommendations and Conditions regarding the Draft Environmental Impact Statement (DEIS) for the CRC project:

Primary Conclusions

N-022-005
- Bridge
  1. The two existing I-5 Bridges between Vancouver and Portland are functionally and structurally obsolete.
  2. Addition of a new I-5 Bridge, located either upstream of I-205 or downstream of the existing I-5 Bridges near the Burlington Northern Santa Fe railroad bridge, would not relieve either the current or the projected traffic congestion.
  3. Replacement of the existing I-5 Bridges with a new modern structure would be more cost-effective than restoration and expansion of the old existing bridge structures.

N-022-006
- High Capacity Rapid Transit (HCRT) - Mode
  1. Long-term future dependence on single occupancy commuter vehicles would be economically unjustifiable and environmentally irresponsible.
  2. HCRT commuter service between Vancouver and Portland is essential to the future economic vitality of Clark County, the City of Vancouver and the Esther Short Neighborhood.

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Street and 17th Street as possible alternative east/west connections, the latter having not been analyzed in the DEIS. Following approximately 5 months of coordination, in addition to public open houses and walking tours, the VWG was nearly evenly split on the 17th Street or McLoughlin alignment as the east/west connection to the Clark College Park and Ride. The 16th Street alignment was dropped from considerations due to cost, speed and safety considerations.

Upon learning about the VWG's split vote of the east-west alignment, members of City of Vancouver Council and C-TRAN's Board of Directors directed CRC staff to more thoroughly investigate both the McLoughlin and 17th Alignments. From November 2009 until February 2010 CRC project staff conducted extensive technical work and public outreach regarding the alignment options. Based on this additional research and public input, the City of Vancouver City Council voted unanimously to adopt the 17th alignment.

Regarding Washington Street, following approximately 5 months of coordination, in addition to public open houses and walking tours, the VWG recommended the Washington-Broadway Couplet through downtown Vancouver to C-TRAN and City of Vancouver staff. Per the Vancouver Working Group Final Report (October 2009), this alignment was preferred largely because it spread the potential impacts and benefits across two streets, as opposed to concentrating them on a single street.

These alignments were adopted as part of the LPA and is analyzed in the FEIS. For more information on the transit alignment decision-making process please see Chapter 2 (Section 2.7) of the FEIS.

N-022-003
Thank you for taking the time to submit your comments on the I-5 CRC DEIS.

N-022-006

3. The future long-term operations and maintenance of bus rapid transit would be substantially more costly than light rail, especially when considering the rapidly increasing costs for hydrocarbon-based fuels.
4. Portland and Tri-Met have currently and for 20 years successfully utilized light rail as the preferred mode of commuter rapid transit.
5. Tri-Met has more expertise and experience designing, constructing, operating and maintaining light rail rapid transit systems than any other public agency in the US; whereas C-Tran has none.
6. Light rail can be either a benefit or a detriment to the neighborhoods that it traverses, depending directly on the selected alignment and on the details of the facilities design, construction and operation.

N-022-007

- High Capacity Rapid Transit (HCRT) - Alignment

1. The HCRT network, currently being planned by the Southwest Washington Regional Transportation Council to serve Clark County, will radiate eastward from I-5 along SR 14, Mill Plain, and Fourth Plain as well as north along the east side of I-5.
2. The CRC HCRT system that is ultimately selected must be compatible and interface smoothly with the planned Clark County system.
3. Several alternative routes through downtown Vancouver are depicted in the DEIS.
   - Washington Street in downtown Vancouver has more north-south right-of-way width and more compatible adjacent land use for light rail than does Broadway Street.
   - McLoughlin Street in downtown Vancouver has more east-west right-of-way width and more compatible adjacent land use for light rail than does 16th Street. Additionally, McLoughlin Street already includes an I-5 under crossing and 16th Street does not.

N-022-008

- Connectivity & Funding

1. The existing I-5 corridor physically isolates downtown Vancouver from the rest of the City. The CRC project presents an excellent opportunity to re-connect downtown Vancouver, south along Main Street to the Columbia River waterfront and east at several locations into the Historic Reserve.

N-022-009

2. Funding for long-term operations and maintenance of the completed Columbia River Crossing project facilities, as with all public transportation systems, will require some method(s) of public subsidy.

N-022-010

3. Tolling is an appropriate funding method to offset a portion of the capital as well as the operations and maintenance costs, when it is used as an integral part of a comprehensive financial program.
4. Tolling can be an effective way to help manage traffic congestion when it is used as an integral part of an intermodal transportation system.

N-022-011

5. There is a potential risk that acquisition of funding for operations and maintenance of the high capacity rapid transit component of the CRC project could be allocated

N-022-004

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

N-022-005

Please see response to comment N-022-001.

N-022-006

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.

N-022-007

The CRC Project is focused on providing a high-capacity transit option through downtown Vancouver to Clark College. RTC has completed a

N-022-011 disproportionately to those located closest to transit stations rather than being equitably apportioned among all beneficiaries.

N-022-012 **Recommendations**

Based on the foregoing conclusions, the Esther Short Neighborhood Association DAP committee recommends the following:

1. Select I-5 bridge replacement, Alternative 3, as the preferred DEIS alternative.
2. Select light rail, Alternative 3, as the preferred DEIS mode of high capacity rapid transit.
3. Select the light rail route option that extends two-way within the Washington Street right-of-way, north to McLoughlin Street, then east within the McLoughlin right-of-way across I-5 terminating at Clark College.

N-022-013 **Conditions**

The foregoing recommendations are based on the following conditions:

1. A formal written agreement must be established between C-Tran, Tri-Met, Portland Metro, SWRTC, the City of Vancouver, and the two state Departments of Transportation:
   - clearly establishing the management structure for implementation, operations and maintenance of the facilities,
   - clearly defining the specific responsibilities of each of the respective agencies within the management structure, and
   - ensuring that Tri-Met is a direct participant in the design, construction, and initial operations and maintenance of the proposed light rail system.

N-022-014 2. Provisions must be included in the project to re-establish downtown connectivity south to the Columbia River waterfront and east into the Historic Reserve.

N-022-015 3. Provisions must be included in the project to identify, schedule and implement mitigation measures for any negative impacts anticipated to result to downtown businesses, residences and public agencies from construction and/or operation of the proposed facilities.

N-022-016 4. Funding mechanism(s), acceptable to the impacted businesses, residences and public agencies, must be established ensuring that the future cost of system operations and maintenance is equitably shared by ALL beneficiaries.

N-022-017 5. A "detailed financial plan" must be prepared and published that:
   - quantifies all realistic sources of funding, both public and private, for each phase of project implementation, operations and maintenance and
   - establishes a system for rigorously managing project expenditures and public and private revenues in accordance with the financial plan.

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.

N-022-008

The CRC project is contributing significantly to the design competition and later completion of a Community Connector, or lid, at Evergreen Boulevard. There will also be considerable open space underneath the Vancouver bridge head, allowing for a park-like setting to reconnect the east and west sides of the bridge. The CRC project team, in coordination with the CRC Pedestrian and Bicycle Advisory Committee, has also designed improved east-west connections for bicycles and pedestrians at six interchanges in the project area, and at Evergreen Boulevard, and the 29th and 33rd Street overpasses in Vancouver. Lastly, raising I-5 at the SR 14 interchange would allow for an extension of Main Street from 5th Street South to Columbia Way. A more detailed description of these facilities can be found in Chapter 2 of the FEIS.

N-022-009

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

N-022-010

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

N-022-011

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. As Oregon and Washington businesses and residents will benefit from the project's multi-modal improvements, both states have been identified as contributors to the project. As jurisdictions on both sides of the river seek to encourage non-auto travel, tolls are not anticipated for bikes, pedestrians, and transit users. Lastly, CRC assumes funds allocated to other projects and purposes would remain dedicated to those projects and purposes.

N-022-012

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

N-022-013

Following the close of the 60-day DEIS comment period and the selection of an LPA, a 10-member governor-appointed panel was formed to advise the Oregon and Washington DOTs on project development for the CRC project. The Project Sponsors Council (PSC) was charged with advising the project on completion of the FEIS, project design, project timeline, sustainable construction methods, consistency with greenhouse gas emission reduction goals and the financial plan. The PSC made recommendations after considering technical information, receiving input from relevant advisory groups and reviewing public comments. See Chapter 2 (Section 2.7) of the FEIS for details on the PSC's recommendations.

The PSC also contributed to the development of a set of performance

standards that can achieve the goal that you have described. These performance measures will be used by the parties that you listed to help complete the project's design and help manage the facility with a sensitivity to freight mobility, induced growth, climate change, and numerous other factors.

N-022-014

Please see response to comment N-022-008.

N-022-015

Mitigation includes a variety of measures intended to avoid impacts, minimize impacts, and compensate for impacts that cannot be avoided. Most mitigation measures address specific impacts, and many are developed in response to specific regulatory requirements. Even with this level of specificity, there is some flexibility to evaluate the full collection of mitigation measures in a larger context. For example, the proposed storm water management approach has been evaluated for its potential benefits not only to water quality, but also to fish, wildlife and aesthetics. Similarly, the project has worked closely with regulatory agencies to identify habitat mitigation measures that address not only the project's impacts on habitat, but also the larger context of how project mitigation could provide even greater benefit to fish and wildlife by addressing watershed-level priority mitigation. The inherent purpose of mitigation is to address specific unavoidable adverse impacts of the project but this has not prevented the project from developing an integrated mitigation package.

N-022-016

See discussion of project funding, above.

N-022-017

See discussion of project funding, above. Regarding managing project

expenditures, each agency that would expend public dollars has established standards for managing and tracking the expenditure of funds for projects of this type.