

**Hines, Maurice**

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**From:** Newt Rumble [Newt@vancouvercpa.com]  
**Sent:** Friday, October 21, 2011 6:18 PM  
**To:** Columbia River Crossing  
**Subject:** Concerns about CRC FEIS - Draft comments

**B-004-001** I am opposed to this project on many fronts. I have not always had such concerns, and have been following it from inception. However, in the last 9 months the plethora of information which has been released following various FOIA requests has caused me to be in opposition.

There is no doubt that this geographic region has serious transportation impediments related to an overcrowded I-5 traffic corridor. This has negatively affected commerce, and economic development in the area. It also places the area at risk in the event of natural disaster and/or security concerns.

However, this CRC project, clearly, will not solve any of these concerns – except for the construction of a crossing that is more seismically protected. A simple review of the information considered by the planning council and sponsor agencies, and the information provided by selected and highly compromised project managers and vendors demonstrates that the CRC project will not improve daily traffic flows north and south bound between the Portland metro area and Clark County, let alone to the greater SW Washington area. The historic connections between area transportation agencies and municipalities with the Project Contractor and Manager (David Evans and Associates) raises concerns about independence, oversight, predetermined selection and design review processes, conflict of interest, management effectiveness, and cost control.

**B-004-002** The project activity to date has been highly mismanaged and characterized by a lack of transparency, with various community and elected officials being spoon fed selective information to insure decision making consistent with the interests of the contractors, agencies and their staff, and perhaps even certain private parties. There are instances, involving significant amounts of money, where Contractor David Evans and Associates engaged entities who were already under separate contract to the project to perform services, which were then billed back to the CRC project and then subject to a 4% profit markup by DEA.

Data in conflict with the planning agencies and managers predetermined goals has been ignored, misinterpreted, and/or miscommunicated in efforts to create a “need” for all aspects of the project, including light rail.

**B-004-003** The CRC project, as part of its federal funding mandate, required consensus among the sponsor agencies throughout the planning phase as a prerequisite to major design and planning conclusions. In the absence of

**B-004-001**

The independently validated results of the project traffic modeling show clear improvements in travel time, congestion relief, auto emissions, and safety. Please see Section 3.1 for details.

**B-004-002**

The NEPA process has considered all relevant and available information regarding alternatives and impacts.

Effective and fair program and agency management and decision-making are critically important, but they are not appropriate issues to be evaluated in the environmental review and NEPA process. If you have specific concerns about these issues please contact WSDOT directly.

**B-004-003**

See the response to comment B-004-002 above. The FEIS describes the rationale for, and benefits from, including light rail transit (see Chapter 2 and Section 3.1 in particular).

**B-004-003** specific leadership, this consensus requirement has allowed individual agencies to hold the project design and planning "hostage" to their various special interests, in spite of questionable cost/benefit considerations to the other agencies and the general public. Most notably this would be applied to the decision to add light rail to the project – a concept ostensibly sold as a requirement of federal funding; but in truth a requirement only of sponsor agency Metro, but used in the construct of the consensus mandate, it appears instead as a federal mandate.

**B-004-004** The funding resources to pay for the construction, including tolling projections were understated and undisclosed, creating a perception of purposeful obfuscation to avoid the negative backlash that would occur and which might cause the CRC project's viability to be questioned.

**B-004-005** This region has known for more than 30 years that most viable solution to the I-5 congestion problem follows the "Western Bypass" concept. The "Western" solution solves numerous environmental, social, economic, and logistical concerns raised in the current project, for significantly less and more predictable costs. Yet, it is routinely disregarded, and was in this case, because it had little direct benefit to certain agencies, most notably the Portland Bureau of Transportation and the Portland Bureau of Planning and Sustainability. Both of these agencies input is tainted by decisions and efforts within the project to increase urban densification and mass transit – in spite of a plethora of research nationwide and internationally that show that both efforts increase transportation costs, housing costs, and are characterized by an underutilization of mass transit. The "Western" route would open up commercial and industrial development along I-5 from Ridgefield to Kalama, an area with economic and practical availability of land, labor, community resources and a labor force characterized by high under-employment and unemployment.

**B-004-006** The project is characterized by no single project leader, which has led to huge cost over runs, or underestimations of minimally necessary costs from inception. However, information from the project seems to indicate such understatements are part of a "palatability" rinse of the project to insure it's acceptance by the general public and to keep the true cost and mismanagement of the project from public scrutiny. The project's fiscal controls and accountability do not begin to approach even the lowest standard applied to federal grants as established by PL 104-156. This standard, affecting the audits of States, local governments, and non-profit organizations expending Federal funds, describes accountability and controls that are minimally acceptable in order for the financial transactions of the entity to be audited and receive an opinion that the entity and its financial operations are stated in such a manner as to be materially accurate, and the operations that produced the transactions are managed, with suitable oversight so as to be materially free of risk of misstatement, error, or malfeasance. The project has no single entity that has taken the responsibility for managing and/or reporting to the public on the sources and

#### **B-004-004**

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. 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.

The project has not attempted to minimize the costs of the project. In fact, there are many estimations, such as property acquisitions, that have been made rather conservatively. There are a number of properties that the project will work to avoid or minimize impacts to. Some of these properties, because we are uncertain if we will be able to avoid them as design advances, are shown as displacements in the FEIS and included in acquisition cost estimating.

Governors Kitzhaber and Gregoire, and Oregon and Washington legislators have made it clear that they will review every element of this project and provide oversight and accountability. The governors and legislative leaders are discussing the scope of interim legislative oversight committees. At Governor Kitzhaber's request, the Oregon State Treasurer conducted an independent review of the CRC's financing plan and released a report in July 2011. CRC incorporated the treasurer's recommendation in Chapter 4 of the Final EIS.

#### **B-004-005**

New corridors, including a "western bypass", were among ideas and proposals evaluated early in the CRC development process, as discussed in Section 2.7 of the FEIS.

#### **B-004-006**

The project is currently undertaking an audit, which is being conducted in addition to the normal and customary financial controls for a project of

**B-004-006** uses of nearly \$155 million of public funds, in spite of the fact that the total expenditure includes over \$90 million expended to David Evans and Associates, which is about 80% more than the amount of their original contract. Indeed, the coordinating organization, the Columbia River Crossing Project office asserts that they and the agencies have no requirement for accountability because the area "project office" is not a reporting entity. The extreme shallowness of such an attitude should play havoc with every citizen's faith in the role of governance. In every instance of major construction project conception – from project owner to contractor management to project supervision, yea even to task supervision – accountability and fiscal reporting is the industry standard for ensuring project timeliness and profitability and cost effectiveness. There simply are no exceptions! At least none that would stand the test of scrutiny! The tragedy in such a comment is that it displays the reckless spending and casual ownership that is far too often taken for granted by public sector employees with regard to their responsibility to their "shareholders", i.e. the taxpaying public.

To conclude:

- B-004-007** • The region needs an additional interstate commerce byway to improve transportation flow in the area.
- Whether by "Western Route" or "Eastern Route" (a more short sighted concept than the former), either would be more practically and economically palatable to the congestion problem faced on the existing connection or a successor at the same site.
- Under any alternative, there is no doubt that the I-5 bridge needs to be replaced and likely expanded, along with design corrections to a hodge podge of freeway access points that have been cobbled together over a 60 year period along the crowded Portland metro corridor.
- The present CRC project barely accomplishes the replacement need, without addressing the transportation and congestion and economic development components, at an extremely high price; and leaves the region continually vulnerable to the problems of limited crossing alternatives in a metropolitan area of 2.7 million people.
- B-004-008** • The existing CRC project as outlined in the FEIS is driven outside of reasonable financing boundaries by design flaws, and project add ins, like light rail
- B-004-009** • The SW Washington area has repeatedly rebuffed light rail proposals for the area. It is time to take this issue off the table, and give the people what they need, and have expressed as "what they want" – or don't – as the case may be.
- The people of SW Washington do not want urban densification, do not want time consuming and expensive transportation alternatives, and do want a system that will improve the flow of commerce up and down the greater west coast interstate highway system.

Sincerely,

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this type. Inquiries about particular financial issues should be sent to the project office. The expenditures to date are generally in line with a project of this size. The project has managed to reach agreement on many issues among many jurisdictions. Additionally, the project has nearly completed the NEPA environmental analysis, has reached nearly 30% design, has conducted an extremely thorough outreach effort, and has completed considerable geotechnical and other pre-construction testing. WSDOT and other sponsoring agencies have taken financial accountability very seriously and do have the records of such management. The joint management structure has actually been a cost saving measure rather than an effort to obfuscate spending.

#### **B-004-007**

Mr. Rumble comments that the I-5 CRC project alone is not enough to solve a number of regional transportation and other needs. This is acknowledged. The CRC project is intended to address the specific needs identified for this portion of the corridor and region, as described in Chapter 1 of the FEIS. It addresses these needs and has independent utility, but it does not address other transportation needs in the region.

#### **B-004-008**

The project has worked with local decision makers to balance the need to reduce costs and yet provide a comprehensive solution. Light Rail is a critically important part of the project, supported by all local agencies, and by locally adopted plans.

#### **B-004-009**

Light rail has been endorsed by every local Sponsoring Agency (Vancouver City Council, C-TRAN, RTC, Portland City Council, TriMet, and Metro), whose boards include elected leadership from throughout the area.

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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.

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. The ability to efficiently move freight in the Vancouver/Portland region is critical to the overall health of our economy. As such, the CRC project is designed to improve freight mobility on I-5, as well as make it safer and easier for trucks to get on and off I-5 to reach businesses and Port facilities. The Freight Working Group (FWG), comprised of representatives of the Vancouver-Portland metropolitan area's freight industry, met 22 times throughout the DEIS and FEIS development process to advise and inform the Columbia River Crossing project team about freight issues. The group provided insight, observation, and recommendation about the needs for truck access and mobility within the corridor; characterized the horizontal and vertical clearances, acceleration/deceleration, and stopping performance needs of trucks that

must be accommodated; and provided meaningful comments on the effect of geometric, regulatory, and capacity changes on truck movements in the corridor. See Chapter 3 (Section 3.1) of the FEIS for detailed discussion of how the project increases freight mobility and access along I-5 and in the region.



RECEIVED  
OCT. 14 2011  
Columbia River Crossing

October 13, 2011

Columbia River Crossing Project  
700 Washington Street  
Suite 300  
Vancouver, WA 98660  
Attn.: Heather Wills, CRC Environmental Manager

Re: Columbia River Crossing (CRC) Project EIS

Dear Ms. Wills:

B-005-001

Following is written comment from Jubitz Corporation ("Jubitz") with respect to the replacement of the I-5 Columbia River Bridge project ("Project") and the Final Environmental Impact Statement (EIS) published September 23, 2011. Our comments are timely within the 30-day review/comment period, and refer specifically to proposed highway improvements in North Portland associated with the Project, to wit: the proposed Martin Luther King Blvd. ("MLK") off-ramp connection to N.E. Union Court/Union Court.

**Background.**

Since 1958, Jubitz Corporation has operated a truck stop at the Jubitz Travel Center located at 10210 N. Vancouver Way. Our present facility covers 24 acres, generally serving 1000(+) trucks per day. The bulk of our over-the-road highway traffic comes from the I-5 freeway, with additional material daily truck traffic from the Port of Portland loading areas West of I-5. Other trucking companies in our immediate vicinity which also produce large I-5 truck traffic counts are Market Transport (110 N. Marine Drive), Hancy Truck Line (10505 NE 2<sup>nd</sup> Avenue) and USF Reddaway (10510 N. Vancouver Way).

Jubitz is generally in support of the CRC bridge replacement as presently designed. The bridge replacement should help alleviate the current congestion in the I-5 bridge vicinity, and will facilitate commercial trucks accessing I-5 from our general area.

Jubitz objects, however, to the current proposed configuration for commercial trucks accessing our facility or other proximate trucking locales from I-5 via Martin Luther King Blvd. ("MLK"). Specifically, the current proposal utilizes an extended loop off-ramp from MLK to connect with N. Hayden Meadows Drive and NE Union Court before passing underneath MLK to connect with N. Vancouver Way. This differs from the earlier MLK off-ramp configuration described by **Option 12 Modified** (see "Marine

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**B-005-001**

Several designs have been considered for reconfiguring access to I-5, and across I-5, from the east through the Marine Drive interchange area. All of the options have advantages and disadvantages. The project will continue to attempt to minimize adverse impacts to all resources and property owners as much as practicable. We urge Jubitz and other stakeholders to continue to coordinate with ODOT and the project to determine if there are refinements or measures that can be implemented to reduce the impacts Mr. Stibolt outlines in this letter.

There will be additional out-of-direction travel for vehicles from I-5 to Jubitz but the proposed local street network provides good intersection spacing on Vancouver Way which will improve traffic operations. There is no out of direction travel for vehicles destined to the interchange from Jubitz – the distance is virtually the same compared to existing. There is actually some improvement by removing the out of direction loops on the existing northbound entrance ramp. The access between MLK Jr. Blvd and Marine Drive and Vancouver Way is improved by adding acceleration and deceleration length on the connections and appropriate weave distance between the connections and the interchange. The proposed layout simplifies the network by providing better spacing in the connections to redesign the three streets that currently connect near the interchange.

**B-005-001**

Drive Interchange Alignment Recommendation Process—Final Summary Report and Stakeholder Recommendation” published October 2009, File ID 771). Option 12 Modified utilizes a substantially shorter and simplified MLK off-ramp to connect with Union Court and the N. Vancouver Way area.

Our objections to the current proposal v. Option 12 Modified include the following:

- The current proposed configuration unnecessarily adds 2400 feet (.45 mile) of additional truck driving distance, resulting in increased fuel consumption and costs for each truck exiting I-5 to access Jubitz and other area trucking centers.
- The current proposed configuration unnecessarily results in the emission of additional greenhouse gases due to additional drive distance.

**Discussion.**

THE PROPOSED CONFIGURATION UNNECESSARILY ADDS 2400 FEET (.45 MILE) OF ADDITIONAL TRUCK DRIVING DISTANCE RESULTING IN INCREASED FUEL CONSUMPTION AND ASSOCIATED COSTS.

Contrary to the Option 12 Modified plan, the proposed MLK off-ramp results on excess fuel consumption due to extended off-ramp distance with resulting costs to commercial trucking. In addition to distance alone, the current configuration adds a third intersection necessitating truck stoppage and starting. Compared to Option 12 Modified, it is estimated that the combination of distance plus additional fuel consumption due to required truck acceleration due to the added intersection may result in up to an additional .17 gallons of fuel burned by each truck utilizing the off-ramp. Positing an average figure of 1000 trucks per day accessing Jubitz plus a conservative estimate of an additional 500 trucks generally accessing other local trucking destinations from I-5, this results in an additional daily consumption of 255 gallons of diesel fuel, or over 93,000 gallons per year. Applying current and anticipated diesel fuel pricing of approximately \$4.00/gallon, the proposed configuration results in additional costs of over \$370,000 per year to access local truck locations.

THE PROPOSED CONFIGURATION RESULTS IN THE UNNECESSARILY EMISSION OF ADDITIONAL GREENHOUSE GASES DUE TO ADDITIONAL DRIVE DISTANCE.

As described above, utilizing an average figure of 1500 trucks per day, the proposed MLK off-ramp configuration will burn 93,000(+) additional gallons of diesel fuel per year to cover the additional 675 miles (.45 miles x 1500) of off-ramp distance. This results in unnecessary emissions of greenhouse gases otherwise avoided by Option 12 Modified.

B-005-001

**October 2009 Marine Drive Interchange Alignment Recommendation.**

A review of the October 2009 Recommendation of **Option 12 Modified** includes multiple findings as well as analyses supporting the recommended design. These findings have not been changed, and remain compelling reasons to adopt the Option 12 Modified proposal

**Summary.**

Discussions with CRC Committee representatives indicate that considerations for the currently-proposed MLK off-ramp configuration include potential interference with a deeded dog park area, visual proximity of the Option 12 Modified N.E. Union Court intersection to Delta Park softball fields, potential close juxtaposition of the Option 12 Modified N.E. Union Court intersection with the (new) N. Vancouver Way intersection,<sup>1</sup> and maximizing the space between the I-5 intersection and a connection with N.E. Union Court. Particularly with respect to the final point, Jubitz believes its above-described objections renders the current proposed off-ramp configuration inferior to the **Option 12 Modified** MLK off-ramp design.

I would appreciate an opportunity to discuss our comment with you.

Sincerely,



Victor D. Stibolt  
Vice President Administration & General Counsel  
(503.345.0313)

cc: Aaron Myton, P.E., Columbia River Crossing Committee  
Gary Wilson, Market Transport  
Pat Roetker, Asst. Terminal Manager USF Reddaway  
Haney Truck Lines  
Corky Collier, Executive Director Columbia Corridor Association

<sup>1</sup> This objection by CRC Committee presumes both intersections will be governed by traffic lights. While a traffic signal will be reasonably required for N. Vancouver Way, the Union Court intersection under Option 12 Modified may well be better served through use of simple stop signs which have adequately served all truck traffic currently accessing N. Vancouver Way from I-5.



Columbia River **CROSSING** Marine Drive - Local connections and distances

MARTIN LUTHER KING JR. BOULEVARD AT GERTZ ROAD

**TO:** Southbound I5  
 Current Distance: 1.9 Miles  
 New Distance: 1.6 Miles

**FROM:** Southbound I5  
 Current Distance: 1.9 Miles  
 New Distance: 1.6 Miles

**TO:** Northbound I5  
 Current Distance: 2.0 Miles  
 New Distance: 1.5 Miles

**FROM:** Northbound I5  
 Current Distance: 1.5 Miles  
 New Distance: 1.5 Miles

MARINE DRIVE AT N. GANTENBEIN AVENUE

**TO:** Southbound I5  
 Current Distance: 1.4 Miles  
 New Distance: 1.6 Miles

**FROM:** Southbound I5  
 Current Distance: 1.6 Miles  
 New Distance: 1.7 Miles

**TO:** Northbound I5  
 Current Distance: 1.4 Miles  
 New Distance: 1.5 Miles

**FROM:** Northbound I5  
 Current Distance: 1.5 Miles  
 New Distance: 1.6 Miles



**DRAFT**  
 JULY 2011

■ Bicycle/Pedestrian Route  
■ Light Rail Extension  
■ MAX Yellow Line

\*Not to scale. For illustrative purposes only.