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STATE OF WASHINGTON  
RECREATION AND CONSERVATION OFFICE

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October 18, 2011

Columbia River Crossing  
c/o Heather Mills  
CRC Environmental Manager  
700 Washington Street, Suite 300  
Vancouver WA 98660

RECEIVED  
OCT 24 2011  
Columbia River Crossing

Subject: Potential Impacts to RCO Grant Funded Sites from the Columbia River Crossing Project

Dear Ms. Mills:

S-001-001

The purpose of this letter is to notify you that existing grant funded recreation and conservation sites should be considered in your project planning and construction for the Columbia River Crossing Project.

The Recreation and Conservation Office (RCO) is a small state agency responsible for the administration of a wide range of grant programs for outdoor recreation, conversation and salmon habitat restoration. We administer several thousand grants which have been funded by a variety of programs since 1966. Most of these grants have long-term obligations. One of the primary duties of the RCO is to ensure compliance of the grant agreements and therefore protect the public investment in these grants, in perpetuity.

RCO has recently had the opportunity to review the summary of the FEIS (September 2011) for the above-referenced project. As is customary with projects of this kind, we take a preliminary look to see if there are RCO grant funded parks or conservation sites which might be adversely affected by the proposed project. The result of our initial review is that there appears to be at least five sites which might be affected by the new bridge project. I have attached an image with the sites which we believe are the most likely to be adversely impacted.

The consequences of causing adverse impacts to grant-funded sites or facilities can be severe. If all or any portion of a site or facility is changed in a manner that adversely affects the intended purposes of the grant, the sponsor, in this case Vancouver-Clark Parks and Recreation Department may be required to purchase replacement property or facilities of equal utility and current market value. The sponsor may have the right to look to your agency to finance such replacement.

Recreation and Conservation Funding Board • Salmon Recovery Funding Board  
Washington Invasive Species Council • Governor's Salmon Recovery Office  
Habitat and Recreation Lands Coordinating Group



## S-001-001

Thank you for your recent comments on the CRC FEIS. We will include this letter with the other correspondence the project has had with the Washington Recreation and Conservation Office through coordination that began in early 2008. Coordination with RCO has included meetings and conversations with Myra Barker and Kim Sellers. The information you provided in your recent letter is consistent with the information Myra and Kim previously provided. However, there is one error in the map that you provided – Biddlewood Park is shown at the SR 14/ I-5 interchange but it is actually much further east, well outside the project area.

We have also been coordinating with Vancouver City Parks and Recreation staff, including Jane Kleiner-Tessner. Past input from your staff and from City staff has been carefully considered as we advanced the design. The impacts to park and recreation resources are described in the Final EIS and technical reports, and we are confident that the locally preferred alternative can adequately avoid or minimize impacts to the identified resources, and mitigate impacts that cannot be avoided. We look forward to continued coordination with the RCO.

Columbia River Crossing Project  
October 18, 2011  
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**S-001-001** Further research will be required to determine the specific impacts of this project on each particular grant funded site. As you move forward I would suggest that you contact Jim Anest, RCO's Conversion Specialist at (360) 725-3932 and Ms. Jane Tesner Kleiner at the Vancouver-Clark Parks and Recreation Department (360) 487-8313 to discuss these possible impacts.

We look forward to working with you in the near future.

Sincerely,



Scott T. Robinson  
Conservation and Grant Services Section Manager

cc: Jim Anest, RCO  
Jane Tesner Kleiner, Vancouver Parks and Recreation Department  
Heather Ramsay, National Park Service

Attachment- Potential Impacts to RCO Grant Funded Sites from the Columbia River Crossing Project



Burnt Bridge Creek Trail, RCO# 00-1496D	Leverich Park, RCO# 82-054D
Rose Village Neighborhood Park, RCO# 10-1187A	Columbia River Transient Moorage, RCO# 92-388D
Biddlewood Park, RCO#92-247A	



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

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711 for Washington Relay Service • Persons with a speech disability can call 877-833-6344

October 21, 2011

Ms. Heather Wills  
CRC Environmental Manager  
700 Washington Street, Suite 300  
Vancouver, WA 98660



Dear Ms. Wills:

**S-002-001** Thank you for the opportunity to comment on the final environmental impact statement for the Interstate 5 Columbia River Crossing project located in Vancouver, Washington and Portland, Oregon. The Department of Ecology (Ecology) reviewed the information provided and has the following comment(s):

**SHORELANDS & ENVIRONMENTAL ASSISTANCE:**  
**Rebecca Schroeder (360) 407-7273**

Ensure that this project is consistent with the State Shoreline Management Act and the Clark County Shoreline Master Program. Placement of fill in wetlands may require an individual or general (nationwide) permit from the U.S. Army of Corps of Engineers (Corps). We advise the applicant to contact the Corps to determine whether a permit is needed. Should an individual Corps permit be required, a water quality certification will also be required from Ecology. Ecology will therefore provide additional review at that time.

**WASTE 2 RESOURCES: Mike Drumright (360) 407-6397**

To mitigate the impact of the impervious surfaces resulted from the future development, the applicant may wish to refer to the low impact development strategies in the comprehensive land use plan. You can find the Low Impact Development Technical Manual at the Puget Sound Partnership website [http://www.psp.wa.gov/downloads/LID/LID\\_manual2005.pdf](http://www.psp.wa.gov/downloads/LID/LID_manual2005.pdf).

Ecology's comments are based upon information provided by the lead agency. As such, they may not constitute an exhaustive list of the various authorizations that must be obtained or legal requirements that must be fulfilled in order to carry out the proposed action.

If you have any questions or would like to respond to these comments, please contact the appropriate reviewing staff listed above.

Department of Ecology  
Southwest Regional Office

(SM:11-4640)

cc: Mike Drumright, W2R  
Rebecca Schroeder, SEA

**S-002-001**

The CRC project appreciates the insight on the permits needed prior to construction of the LPA. The CRC project will be submitting applications in accordance with the State Shoreline Management Act and the County's Shoreline Master Program.

An individual permit from the Corps will be sought under Section 404 of the Clean Water Act. In addition, a Section 9 Rivers and Harbors Act permit will be sought. Both these permits will require a Section 401 Clean Water Act Water Quality Certification from Ecology prior to approval. Additional coordination and project review will occur at that time.

Impervious surfaces from future development will comply with existing requirements, including the incorporation of low-impact strategies where practicable, at the time of development.



# Oregon

John A. Kitzhaber, MD, Governor

Department of Environmental Quality  
Headquarters  
811 SW Sixth Avenue  
Portland, OR 97204-1390  
(503) 229-5696  
FAX (503) 229-6124  
TTY 711

October 24, 2011

Heather Wills  
Columbia River Crossing  
700 Washington St., Suite 300  
Vancouver, WA 98660

Dear Ms. Wills,

**S-003-001**

Thank you for the opportunity to comment on the Final Environmental Impact Statement for the Columbia River Crossing (CRC) project. The comments below are related to the sections of the Final Environmental Impact Statement (EIS) with a direct regulatory or technical nexus to DEQ, based on the preliminary information provided in the Final EIS. The comments do not represent all of the potential requirements DEQ may invoke once additional and more specific information concerning environmental media impacts are known about the project. We will work closely with you and the CRC team as more information becomes available.

DEQ appreciates that the CRC project team involved us early on in the technical analysis process, particularly related to Air Quality. Through its involvement with the InterCEP collaboration process, DEQ's Air Quality program had ample and early opportunity to recommend the use of the most appropriate sources of data and analytical methodologies available at the time. DEQ agrees that climate change is an important issue to evaluate and commends the CRC project team for evaluating and disclosing how greenhouse gas emissions would be influenced by the project's changes on transportation. DEQ expects that green house gas emission analysis and mitigation will continue to be incorporated into all aspects of the project.

Since then, DEQ has been working on the Portland Air Toxics Solutions (PATS) project, a community-based effort to improve public health in the Portland area by reducing risk from air toxics. Through an advisory committee, DEQ has been collaborating with local governments, citizens, communities and businesses to reach recommendations on understanding the regional air toxics problems and opportunities to reduce many pollutants from a variety of sources, including mobile sources. While the technical analysis in PATS was similar to that of CRC, it was not identical (different modeling timeframes, different pollutants, etc.), so results from both projects cannot and should not be compared directly. A link to the PATS project can be found at: <http://www.deq.state.or.us/air/toxics/pats.htm>, including a recommendation contained in the draft report that DEQ evaluate its emissions inventory based on the final design of the CRC. We look forward to future coordination with the CRC project team, Oregon Department of Transportation (ODOT), Metro and the other local transportation agencies as the project moves forward and to further reduce impacts from mobile sources.

Construction equipment represents the largest source category of diesel emissions in the Portland area. Diesel exhaust is a toxic air contaminant with levels in the Portland area which exceed Oregon health benchmarks. DEQ encourages the CRC project team to consider taking additional steps to incorporate clean diesel practices during the construction phases of the project. DEQ is willing to offer assistance to the CRC project team in exploring options to reduce diesel particulate emissions associated with this project.

## **S-003-001**

The project has committed in the Record of Decision to a number of measures to reduce diesel emissions during construction, as well as to continuing to investigate additional measures that could be implemented. We need to be cognizant of how any added measures affect project costs, contracting, and other considerations, but we look forward to continuing to coordinate with DEQ in this investigation. We plan to investigate emerging technologies as well as other best practices and would appreciate DEQ's assistance, expertise, and input.

**S-003-002** Once the proposed final project scope is determined for the CRC project, DEQ will work with the CRC project team, ODOT, and others as appropriate, on stormwater permitting requirements. In addition, if the proposed project requires a Section 404 Clean Water Act Permit from the US Army Corps of Engineers, a 401 Water Quality Certification will be needed from DEQ. DEQ will review the details in the 401 Certification application when available and will provide input at that time.

**S-003-003** As you may know, Oregon has regulatory programs for solid waste and hazardous waste that are administered by DEQ. Once the proposed project is determined, DEQ welcomes the opportunity to work with the CRC team, ODOT and other agencies as necessary through an intergovernmental agreement, if appropriate, to provide technical assistance and discuss options for management of solid and hazardous wastes. DEQ can assist with regulatory questions or issues that may be identified during the planning, bidding, preparation and construction work for this project. The work can encompass a review of proposed sampling protocols, characterization and management options for all solid waste (including sediment or soil) as well as options to prevent generation of and management of hazardous waste. In addition, DEQ is available to review and provide input into the various plans that will be developed associated with hazardous and solid waste.

**S-003-004** DEQ very much supports the sustainability strategy goals and activities for this project. In particular, the goal to minimize the extraction and consumption of raw materials by promoting reuse and recycling of materials during the project is closely aligned with DEQ's work. Please contact DEQ staff to identify and obtain approval for productive reuse of waste materials through DEQ's recently adopted Beneficial Use Determination rules: <http://www.deq.state.or.us/lq/sw/disposal/beneficialuse.htm>

**S-003-005** Finally, there appears to be at least two ongoing environmental cleanup projects located in the area of the preferred alternative. Depending on the location of the final proposed project, assessment and evaluation of cleanup or other engineering controls may be required if any construction activities are proposed to encroach upon areas of contaminated soil or groundwater. DEQ's Cleanup Program has historically assigned a project manager to work with the local or state government to evaluate known or newly discovered contaminated sites on an expedited basis to ensure protection of human health and the environment. Early coordination with the DEQ regarding this topic should be initiated to ensure staff resources are available for the work in the timelines desired.

Thank you again for the opportunity to provide comments. If you have any questions, please contact Nina DeConcini, DEQ's Administrator for our Northwest Regional Office at 503.229.6271 or [deconcini.nina@deq.state.or.us](mailto:deconcini.nina@deq.state.or.us).

Sincerely,



Dick Pedersen  
Director

Attachments: PATS Report Recommendations

### **S-003-002**

The CRC project appreciates the insight on the permits needed prior to construction of the LPA. The CRC project will be submitting applications in accordance with Oregon and federal regulations. An individual permit from the Army Corps of Engineers will be sought under Section 404 of the Clean Water Act. In addition, a Section 9 Rivers and Harbors Act permit from the United States Coast Guard will be sought. Both of these permits will require an authorized Section 401 Clean Water Act Water Quality Certification from DEQ prior to approval. Additional coordination and project review will occur prior to and during permit review.

### **S-003-003**

The project understands that ODOT's hazardous materials department would be working with the CRC team and DEQ to discuss options and management of solid and hazardous wastes, resolve related regulatory questions or issues, and obtain input into various plans associated with hazardous and solid waste.

Also, Focused Environmental Assessments (FEAs) would be reviewed and approved by the state DOT hazardous material departments within each respective state (Oregon and Washington). These FEAs will be conducted in areas not covered by Environmental Site Assessments (ESA), Phase 1 or Phase 2 assessments, and will address the potential to encounter hazardous materials at specific sites, impacts of construction on hazardous materials, and any hazardous materials discoveries. As part of the FEA work plan, the DOT hazardous materials departments will coordinate with ODEQ, WDOE, and/or EPA on any hazardous materials discoveries and will implement the response plan.

### **S-003-004**

Thank you for that recommendation regarding compliance with DEQ's Beneficial Use Determination rules.

**S-003-005**

The project will assume that if it is determined that the location of the final proposed project does encroach upon areas of an ongoing DEQ environmental cleanup project, or a newly discovered site is encountered, that early coordination with the DEQ Cleanup Program would be initiated by ODOT and the CRC team to help ensure DEQ staff resources are available to expedite appropriate actions on a reasonable timeline.