



October 13, 2011

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

RECEIVED  
OCT. 14 2011  
Columbia River Crossing

Re: Columbia River Crossing (CRC) Project EIS

Dear Ms. Wills:

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), Haney 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

**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 dedeed 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

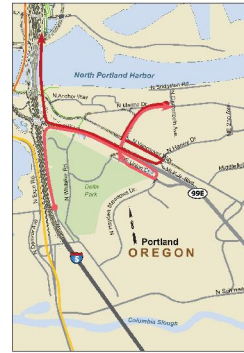
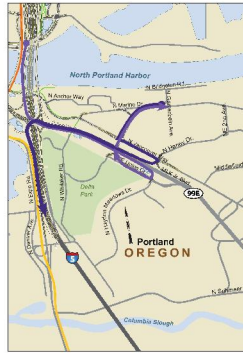
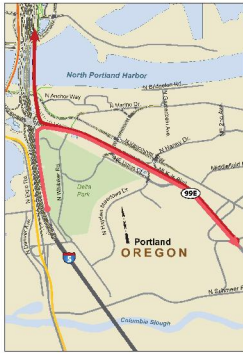
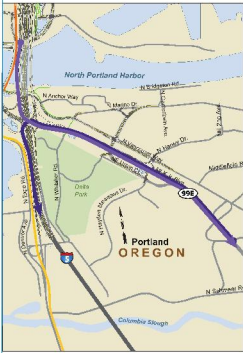
MARINE DRIVE AT N. GANTENBEIN AVENUE

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 purpose only.