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October 24, 2011

MEMORANDUM

TO: Kris Strickler, Deputy Director
Columbia River Crossing
Heather Wills, Environmental Manager
Columbia River Crossing

FROM: John Gillam, Supervising Planner
City of Portland - Bureau of Transportation

SUBJECT: CRC Final Environmental Impact Statement Review
by the City of Portland Technical Advisory Committee

L-001-001

As required by NEPA, the Columbia River Crossing (CRC) published the Final Environmental Impact Statement (FEIS) for the 30-day public comment period which ends October 24, 2011. On behalf of the City of Portland Technical Advisory Committee (CRC TAC), I have collected and summarized the comments and outstanding issues raised by City bureaus regarding the CRC project.

At the CRC TAC meeting held September 20, 2011, CRC and City staff discussed and agreed upon the value of a memo documenting these issues within the public comment period. The intent of this memo is to identify project issues where we feel clarity from the FEIS is needed and project issues that will require on-going coordination and mutual commitments by CRC and the City to reach successful closure as the project moves forward after the FEIS.

PRIOR PROJECT COMMENTS AND COMMITMENTS

As you are aware, the Portland City Council through Resolution 36618 supported the CRC Locally Preferred Alternative (LPA). This support was provisional. This Council action directed that on-going support of the CRC by the City would be guided by a set of policy statements that outlined the need for further work to be undertaken by the CRC during project development following the LPA.

CRC prepared a Status of Locally Preferred Alternative Conditions for review by the Project Sponsors Council on 2/18/11. For the City of Portland many of these conditions were identified as: "Issue is settled or on track to be settled with the conclusion of the FEIS and ROD but further refinement and decision-making after the FEIS/ROD will be required." It is our expectation that all of these issues will continue to be addressed cooperatively with the City following the FEIS and ROD (Record of Decision).

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CRC will continue to coordinate with the City of Portland on relevant permitting issues and the incorporation of aesthetic considerations into project design. We will also coordinate with the City, as appropriate, on the consideration of a community enhancement fund and a governance structure for managing the river crossing.

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The City of Portland also supports the commitments offered by the CRC during the discussion of the project with the Metro Council during August and September of this year. The CRC was reviewed by the Metro Council as part of the approval process for the Land Use Final Order (LUFO) for the project. Specifically, we support the commitments discussed in the letter to Metro Council President Hughes from CRC Project Director Nancy Boyd, and Kris Strickler, Deputy Director, dated September 8, 2011. This letter includes specific CRC responses to questions and discussions related to Long-Term and Short-Term Mitigation Measures, FEIS Issues, and Post-FEIS Issues.

Regarding Post-FEIS issues, we want to particularly highlight our strong support of several commitments made by CRC as part of the LUFO process including: (1) creation of a community enhancement fund to mitigate long-term cumulative freeway impacts on adjacent communities, (2) establishment of a governance structure that allows for local participation in performance-based management of the river crossing, and (3) incorporation of aesthetic considerations identified by stakeholder participants in the Urban Design Advisory Group into the project design.

COMMENTS RELATED TO REVIEW OF THE FEIS

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listed below are comments from City bureaus developed during the review of the FEIS and actions needed to move the project forward after the FEIS. These comments are not intended to be considered as FEIS deficiencies or identify lack of impact disclosure.

1. Impacts to natural resources. The project must comply with the City's Environmental Regulations. Within its borders, the City of Portland Zoning Code regulates wetlands, streams, river buffers and other natural resources. Accordingly, environmental review will be required by the City. We request consultation between the CRC and local permitting agencies to review possible mitigation sites within the City. This environmental review process will determine the level of impacts on qualifying resources; unavoidable impacts will require mitigation.
2. Stormwater management and facilities. The project must comply with the City's Stormwater Management Manual. Prior to obtaining the proper site development permits for the Project, City requirements include review of the following: (a) the location of storm water management facilities; (b) the effect upon the performance of the City's storm water system; and (c) potential impacts to the FEMA flood plain designations. Additionally the size, location, engineering design and aesthetics of stormwater treatment facilities must be considered within the context of the goals and community concept of the Hayden Island Plan.

The Hayden Island Plan anticipated neighborhood-oriented commercial development (retail, services, etc.) on parcels east of the highway and west of N Jantzen Drive. Land use regulations adopted with the plan support this type of development. Recent project designs have shown large stormwater facilities adjacent to the highway on the east in the locations planned for neighborhood commercial development, rendering much of these site non-developable. The CRC should explore stormwater management alternatives with project partners and stakeholders

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The CRC project will coordinate with the City on relevant City permitting requirements regarding natural resources and stormwater, related mitigation, design reviews, the Bridgeton Trail extension, other trail designs as appropriate, design of local roadway improvements, plans for minimizing impacts to businesses during construction, and LRT station design. The project is coordinating with the U.S. Army Corps of Engineers regarding impacts to the levy and related permitting.

The transfer of 0.4 acre of surplus land to the City of Vancouver is mitigation for the project's direct impact on the City's existing Waterfront Park, an existing public park and a Section 4(f) resource. The project has no impact to public parks on Hayden Island and therefore no need for such mitigation. The CRC project does not currently propose to convert the existing Thunderbird site on Hayden Island into a public park, but it also does not preclude it from becoming a public park in the future. The project will consider how CRC project design and construction can avoid precluding the ability of the City to build a park there in the future.

The stormwater facilities shown in the FEIS are preliminary in nature and will continue to be refined as design work progresses. Under the terms of the BO, the CRC project must treat stormwater runoff using bioretention, bioslopes, infiltration ponds, porous pavement, constructed wetlands, and vegetated and soil amended swales designed for infiltration. Based on the information we have on file, stormwater runoff is currently not treated before being released to North Portland Harbor or Columbia River.

The Hayden Island Redevelopment Plan states that runoff from local streets will be treated in roadside planters and that CRC stormwater will be managed in a "green, state-of-the-art manner." The stormwater treatment proposed in the FEIS does include the "green streets" approach proposed in the Hayden Island Redevelopment Plan to the

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and develop solutions that balance stormwater requirements with planning goals in this urbanized setting.

3. Proposed pier locations at the levees along the south. Protection of the levees along North Portland Harbor, especially along the southerly side, is a significant issue for both the Army Corps of Engineers and the City (to minimize flooding). It is necessary to assure that the Army Corps of Engineers confirms that requirements for levy protection in this area are fully satisfied and that the performance of the levees will protect the area from flooding.

4. Design and permitting reviews. Project elements constructed within City of Portland right-of-way require review at the 30%, 60%, 95% and final pre-construction stages. Along with project plans, these reviews require traffic operations analyses, driveway and local street access plans, and pavement analyses. Upon resolution of review issues, City Engineer Steve Townsen, P.E. will approve the plans for construction. For other project elements, site permits processed by the City's Bureau of Development Services will be required.

5. Multi-use Path. This pedestrian and bicycle facility is a critical element of the CRC. The City supports development of the multi-use path (MUP) on the east side of the highway across North Portland Harbor as part of the northbound on-ramp from the Marine Drive interchange. Section 3.1.3 of the FEIS refers to the commitment of the Project Sponsors Council to implement the recommendations of the Pedestrian and Bicycle Advisory Committee (PBAC). PBAC recommends a 24-foot width path for the "bridge under deck" option for the main river crossing, whereas the FEIS refers to a 16-20 foot path width.

The City acknowledges that bridge structure limitations may affect the width of the MUP on the river crossing and over North Portland Harbor and looks forward to working with CRC to design a bicycle and pedestrian facility that is as close to the PBAC recommendation as is technically feasible.

6. Bridgeton Trail connection. The City Council LPA Resolution included Policy Statement MD3: "The CRC project shall include an extension of the pedestrian and bicycle facilities to Bridgeton including a first phase construction of the Bridgeton Trail." Part of this first phase of the trail is now being constructed by the City. During the review of LPA conditions CRC staff indicated that trail segments being built as part of the CRC will extend eastward and connect to the segment being built by the City. This commitment is not clear in the FEIS, but it is our expectation that this will be a part of the project. We also look forward to working with CRC to define the design of other trail elements being built as part of the CRC.

7. Traffic impact analysis and road design. Traffic analyses prepared as part of the FEIS has incorporated zoning and future development assumptions prepared for the Hayden Island Plan. Roadway design including the width of streets has been based on these development assumptions along with certain design, safety and vehicle congestion management standards. However, as the CRC moves forward from the

extent feasible. This approach to stormwater treatment is not suitable for streets located under bridges (where it will be difficult to establish plants) or where streets are at or below the seasonal high groundwater table. We will continue to review the developing design to determine whether additional streets lend themselves to this method of runoff treatment.

The possibility of early construction of the local multimodal bridge will continue to be a consideration by the project as project sequencing is refined. It is also discussed in Chapter 2 of the FEIS, (Section 2.3.1), but not as mitigation. Although it is not appropriate to describe the early construction as mitigation, it is discussed as something we will explore as we further refine construction staging. Specifically Section 2.3.1 of the FEIS states:

Similarly, the Marine Drive interchange construction would need to be coordinated with construction of the southbound lanes coming from Vancouver. While this interchange can be constructed independently from the work described above, the completion and utilization of the ramp system between Hayden Island and Marine Drive requires the work to occur in the same period. Early construction of the local multimodal bridge between Marine Drive and Hayden Island, so that it can be used as an alternate access route during the remaining construction period, will be analyzed during final design. The interchange reconstruction also needs to occur so that Marine Drive can be elevated, allowing the light rail extension to cross under Marine Drive. The Marine Drive interchange is expected to take a little more than 3 years to construct, including work at the Victory Boulevard interchange.

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FEIS toward more detailed roadway plans, the City recommends that a broader range of street design objectives be considered. Objectives such as business access and operations, bicycle facilities, pedestrian facilities and street crossings, stormwater management and streetscape elements need to be recognized.

The project features surface street intersections that involve both State and local road authorities, e.g. the City. Consequently, performance of these intersections requires evaluation based on both State and City performance criteria. Refinements of traffic analyses and design decisions should consider any new information including emerging policies such as proposed amendments to the Transportation Planning Rule and Oregon Highway Plan that recognize special considerations for urban places, particularly those areas served by high capacity transit like Hayden Island.

8. Access to local streets and existing business driveways. Section 3.4.3 of the FEIS references Interchange Area Management Plans (IAMPs) under development "in coordination with the City of Portland, ODOT, and other stakeholders." As development of the IAMPs and roadway design details progress, it is important to incorporate the vehicle access needs of existing businesses as a high priority. CRC has expressed willingness to work closely with PBOT regarding design criteria for determining access for local streets and commercial properties.
9. Minimize disruption to local businesses and residents during construction. Section 2.3.1 of the FEIS describes the construction sequencing, duration, and potential detours at construction locations. The City will require submittals from CRC to review construction staging and traffic control plans for handling traffic during construction. Local area circulation and the amount of time residents will experience disruption are significant issues. The City will require that access to and from Hayden Island be maintained at all times throughout the estimated 65-month interchange construction period.
10. LRT station design. City Council Resolution 36618 included Policy Statement HI1: "Provide ultra high-quality LRT station that provides a community focal point and safe, attractive, and accessible pedestrian and bicycle facilities." The CRC has worked closely with the Portland Working Group (PWG) to investigate options and reach consensus on various station design and access facilities which are not clearly represented in the FEIS graphics. The City understands station design and access is a work in progress looks forward to working with CRC and stakeholders to develop progressive levels of detail to meet the design objectives of the PWG.
11. Local arterial bridge. LPA Option A includes a multi-modal bridge connecting Hayden Island to the mainland south of North Portland Harbor. This design includes functions for traffic, trucks, pedestrians, bicycles and transit. Option A is the only option supported by the City. This local arterial bridge is a critical CRC project feature serving the station community area on Hayden Island. The City believes this bridge should be an early construction phase project element.

Kris Strickler, CRC Deputy Director
Heather Wills, CRC Environmental Manager

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12. Potential future park site. The community concept section of the Hayden Island Plan identified the area west of I-5 as a potential opportunity site for a waterfront park. As CRC project development progresses, the City recommends that design and property decisions consider the potential for a future park and view point along the north bank of the island as represented in the Hayden Island Plan.

On behalf of the City's CRC TAC, we appreciate the opportunity to provide these comments. Please let us know if you have any questions.