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Columbia River Crossing

METROPOLITAN EXPOSITION-RECREATION COMMISSION

June 20, 2008



Ms. Heather Gundersen
Columbia River Crossing
700 Washington Street, Suite 300
Vancouver, Washington 98660

Subject: Interstate 5 Columbia River Crossing Draft Environmental Impact Statement

Dear Ms. Gundersen and Columbia River Crossing Task Force Members:

L-002-001

On behalf of the Metropolitan Exposition Recreation Commission (MERC), a service of Metro, I am transmitting the following comments on the Interstate 5 Columbia River Crossing Project (CRC) as part of the Environmental Impact Statement process. MERC supports your efforts on this complex project addressing multi-modal transportation needs along Interstate 5 (I-5). We have significant concerns about some of the Marine Drive interchange alternatives because of the potentially devastating impacts on the Portland Metro Exposition Center (Expo Center).

We appreciate the opportunity to raise concerns with you during the Interstate 5 Columbia River Crossing Project Draft Environmental Impact Statement (DEIS) public comment period and look forward to participating in the next phases of the process more actively. We understand that the North Marine Drive alignment options study will be conducted under the guidance of the Urban Design Advisory Group (UDAG) and we look forward to reviewing their report when it is available in the coming weeks.

Background

L-002-002

As background to the following CRC comments, I believe it important to first describe MERC's operations and role in the region. MERC's mission is to serve as a catalyst and advocate for community, cultural and economic development in the Portland Metropolitan Region. MERC manages three major community facilities – the Expo Center, Oregon Convention Center and the Portland Center for the Performing Arts. Through leadership and management of these three landmark public event venues, MERC contributes to the cultural and economic health of our region by managing more than 1.5 million square feet of public event spaces and facilities.



L-002-001

Following the publication of the DEIS in May 2008, and the selection of the LPA in July 2008, the CRC project team established a Stakeholder Group to provide feedback on the function and design of the Marine Drive interchange. This advisory group was comprised of a wide range of stakeholders with strong interests in the final design of this interchange including Metro; TriMet; the Oregon Department of Transportation; the City of Portland; the Port of Portland; trucking and distributions companies; the Audubon Society; nearby property owners or operators, such as Diversified Marine and the Metropolitan Exposition Recreation Commission; as well as community members from the surrounding Bridgeton, Kenton, and East Columbia Neighborhoods.

As discussed in Chapter 2 (Section 2.7) of the FEIS, working with this advisory group, the CRC project team conducted studies that analyzed the traffic operations, property impacts, and potential environmental effects for a range of potential interchange designs. The Marine Drive interchange design included in the LPA that is analyzed in the FEIS was developed with this stakeholder advisory group to balance many competing interests, including freight mobility, property impacts to nearby properties, and environmental impacts. More detailed information regarding this process and its outcome is available in the Marine Drive Interchange Alignment Recommendation Process: Final Summary Report and Stakeholder Recommendation, available online in the project's electronic library at www.columbiarivercrossing.org or by contacting the project office.

L-002-002

Thank you for providing this information.

L-002-003

Please see response to comment L-002-001.

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L-002-002

Our Expo Center complex, which is a 52-acre facility complex adjacent to the North Marine Drive interchange of I-5, is an important multi-purpose exhibition facility that has served as the region's primary destination for public events and consumer shows for more than 50 years (see Attachment A Site Plan). The facility consists of more than 330,000 square feet of exhibition space, 11 meeting rooms, professional catering facilities and parking for more than 2,500 vehicles. The Expo Center hosts approximately 100 events a year with more than 500,000 annual visitors. It is the largest and most successful exhibition facility of its kind on the West Coast and is a key economic driver for regional businesses, particularly small business.

MERC's conditional use master plan was originally adopted by the City of Portland in 2001 and runs through 2011. We are currently updating our long-term master plan and as the work progresses, we will share it with the CRC project team to ensure mutual understanding of the opportunities and constraints of our respective projects. We continually update our business plans to ensure that the Expo Center serves the community and the regional economy. We fully expect that the Expo Center will continue to enhance its growing operations in this location for many years to come.

Columbia River Crossing Project DEIS Comments**L-002-003**

MERC supports the principles and considerations expressed by the Metro Council in its action on June 5, 2008 (Resolution 08-3938B). Specifically, we fully support the Metro policy statement on Urban Development Impacts at Redesigned Interchanges which states that "The Metro Council is also concerned that the Marine Drive access points preserve and improve the functionality of the Expo Center."

Fundamentally, our comments in this letter focus on the Marine Drive Interchange area of the CRC project and its impacts on the Expo Center in terms of access, operations, functionality, efficiency and land area. As a neighbor in the Rivergate Industrial District, we also understand and support the key role the transportation network plays for freight mobility and our region's economic viability.

In February 2008, we became aware of several other interchange design alternatives that would dramatically impact Expo Center operations, ranging from minor to potentially detrimental ramifications.

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L-002-003

1. The DEIS contains a "Standard Design" option that reconstructs the interchange in essentially the same general location as the current interchange with enhancements to N. Marine Drive. We understand that the Freight Committee is supportive of this concept. We are also supportive because it works effectively with our operations and anticipate this option to be the least disruptive to serving clients, the general public and maintaining the economic health of the Expo Center long-term.

Specifically, this option best meets our needs for the following reasons:

- a) accommodates the large traffic flows that frequently occur during events;
 - b) does not sever a seven-acre, contiguous parcel of Expo Center property at the southwestern corner of the site which is used for loading and parking functions;
 - c) does not generate significant, new vehicular noise outside of Hall E which could potentially render it unusable for its designed purpose of accommodating consumer shows and events;
 - d) does not generate significant, new vehicular emissions on the southern side of the facility adjacent to our HVAC system intake; and
 - e) enables the existing driveways and road network to continue to accommodate the logistics of trade and consumer shows, including heavy loading, unloading and parking needs of each of the events.
2. We do not endorse the "Diagonal" design alternative which completely eliminates two to three exhibition Halls (A, B and C) plus operational support space, service utilities and a significant parking resource serving the Expo Center. This option could effectively end the viability of the Expo Center. We understand from staff that this option is no longer being given consideration.
 3. We have significant concerns regarding the "Southern Alignment" concepts that are evolving from the DEIS and UDAG processes. Our concerns focus on impaired ingress and egress for clients and the general public, impacts on loading and unloading, loss of parking for clients and the general public, land area reduction due to right-of-way changes, and environmental considerations, such as increased noise impacts and air pollution on Hall E. See Attachment B for a list of additional questions that MERC requests be explored as part of the next phase of analysis.

L-002-004

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

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UDAG Process**L-002-003**

We have been briefed by City of Portland staff on the alternative southern alignment concepts and have more questions than explicit comments at this time. We encourage the UDAG and CRC staff to add specificity to the alignment options so that we can fully evaluate their functionality and impacts on the Expo Center and provide additional comments in the coming phase of the process.

We understand that the Urban Design Advisory Group (UDAG) will continue its work in the next four to five months to study, among other topics, alternative Marine Drive interchange alignments. Given the long-term land-use and transportation planning nature of the upcoming decisions, we ask that the UDAG address all of the alignment options, not solely the "Southern Alignment" options. MERC commits to working effectively with the UDAG to explore these options and provide necessary input on the Expo Center's long-term mission, needs and opportunities.

Closing**L-002-004**

In closing, thank you for the opportunity to provide comments on the CRC DEIS. The Expo Center is a regional destination that has a rich history serving our community's exhibition and event needs. We believe that it will continue to be a viable regional resource for decades to come. Expo Center benefits from the proximity of being located at a major interchange along the I-5 corridor and from the future proposed CRC improvements, including light rail and pedestrian facilities. We look forward to our continued involvement in the CRC process.

Sincerely,



Janice Marquis, Chair
Metropolitan Exposition and Recreation Commission

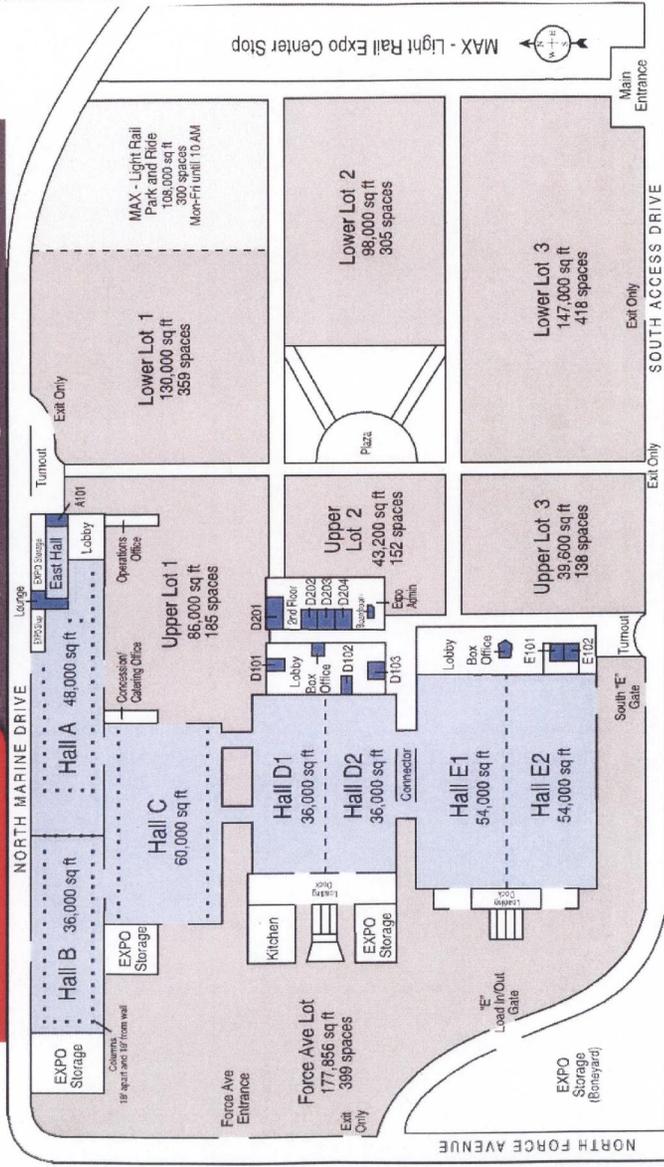
cc: Metropolitan Exposition and Recreation Commission
David Bragdon, President Metro Council
Councilor Rex Burkholder, Metro Council
Portland City Council

Attachment A
Expo Center Site Plan

portland metropolitan exposition center



www.expo-center.org 503.736.5200



Attachment B

**MERC Questions and Concerns
Southern Alignment Options**

L-002-005

Access/Transportation Issues

- a. Where are the access/egress points along Marine Drive and Force Avenue?
- b. Will Denver Avenue/Expo Center Road be connected to a new Marine Drive?
- c. Will the light rail/pedestrian/bike bridge be located adjacent to I-5 or further west and how will the alignment impact the Expo Center operations?
- d. How will the current Marine Drive be utilized?
- e. How will loss of interior service roads on Expo Center property be mitigated?
- f. How will loading and unloading functions occur at the Expo Center? How would the vendors' and clients' large commercial trucks and semi-trucks be able to maneuver and operate effectively?
- g. How will safe and convenient public ingress and egress be addressed for the 500,000 plus visitors to Expo Center each year?
- h. How will the loss of parking be addressed and successfully mitigated?

Environmental Issues

- i. What are the environmental impacts to the Vanport Wetlands? What is the proposed mitigation?
- j. What are the impacts of construction on the Harbor Oil Superfund site adjacent to the Expo Center?
- k. How will noise impacts be abated for Expo Center Hall E?
- l. How will the air quality/ HVAC impacts be mitigated for health and safety?

Site Issues

- m. How is useful access going to be provided to the southwestern seven-acre portion of the Expo Center site that is potentially severed by the southern alignment option?
- n. How would parking access and service road impacts at the southwestern corner of the Expo Center site be mitigated with the severing of the seven-acre corner parcel?
- o. What is proposed for the newly created developable land area directly east of the light rail station?

L-002-005

The Southern Alignment for the Marine Drive Interchange was not selected as the proposed design for this interchange. For a discussion about the proposed Marine Drive Interchange design, please see Chapter 2 of the FEIS. Impacts resulting from this design are discussed in Chapter 3 of the FEIS.