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RECEIVED
JUN 25 2008
Hand Delivered
Columbia River Crossing

June 24, 2008

Columbia River Crossing
c/o Heather Gundersen
700 Washington Street, Suite 300
Vancouver, WA 98660

RE: PUBLIC COMMENT

Dear Committee Members:

- B-014-001** We have taken the time to purchase and read most of the Draft Environmental Impact Statement (DEIS) for the Columbia River Crossing (CRC) and would like to submit our comments for the public record.
- We own the historic Providence Academy at 400 East Evergreen Boulevard and Century House at 312 East Evergreen Boulevard. Also, we own two blocks on the proposed Washington Street Light Rail Transit (LRT) line. First we would like to comment on The Academy property.
- B-014-002** On page 3-117 it is stated that there may be temporary easements onto private property and that property *could be returned* to the owner. The Academy is comprised of six plus acres, and might be used to store equipment. Please be sure to change the word *could* to shall. (See attachment DEIS page 3-117)
- B-014-003** On page 5-34, exhibit 5.3.10 the map shows the land that will more than likely be acquisitioned for the widening of I-5. There are several concerns regarding this acquisitioning. (See attachment DEIS page 5-34, exhibit 5.3.10)
- B-014-004** To begin with, the property line on the exhibit does not show the most southerly half of 12th Street from D Street east to I-5 as part of our property. We will be losing some revenue from permitted parking on that street when I-5 is widened.
- B-014-005** Next, in February 1982 the State of Washington vs. Hidden et al., Judge Dean Morgan attached a "Stipulation Concerning Status of Replacement Road Constructed by the State of Washington" to his decision for the defendants. In the document it reads that the owners of the Academy and subsequent owners of the property will have a permanent easement of West Reserve Road.
- B-014-006** Also, the parking that abuts the most easterly fence on the property will be removed and we will suffer lost revenue as a result of it.

B-014-001

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

B-014-002

Impacts to the Providence Academy property have been minimized to the extent feasible since the publication of the DEIS and, as a result, acquisition of property from the Providence Academy is not expected.

It is not expected that construction equipment will be stored at this site, though if this were to occur the property owner would be compensated for this temporary occupancy. Property temporarily used would be returned to the owner, unless it is needed permanently, at which point it would be purchased at fair market value as determined by an independent appraiser. For more information about this process, please see Chapter 3 (Section 3.3) of the FEIS.

The statement that you refer to in your comment is no longer included in the FEIS, and therefore has not been not changed.

B-014-003

Please see response to comment B-014-002.

B-014-004

It is not expected that the construction or operation of the Columbia River Crossing project would displace parking spaces on 12th Street.

B-014-005

In the Stipulation Concerning Status of Replacement Road Constructed by the State of Washington, dated February 5, 1982, the Stipulation reads the property right is a right to access the road and not an

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B-014-007 | And last, we are concerned that some of our tenants may relocate due to the noise and lack of vehicle circulation during the construction segment of the CRC project. There is a day care that leases the small building located very near to the new easement line. A portion of the playground will be taken and the noise from the construction may be too loud and hazardous for the children in the day care. We are also concerned about Century House at 312 E. Evergreen will not be able to conduct business-as-usual due the reconstruction of the Evergreen Bridge.

B-014-008 | Regarding LRT on Washington Street: We are curious, did anyone from your offices drive the streets to actually see what businesses and buildings already exist on the proposed line(s)?


B-014-009 | On page 3-310, exhibit 3.11.21 page 1 of 2, we own the block at 15th and 16th between Columbia and Washington. It's located directly west of the vacant block that is used for parking. The buildings that front Washington Street were built decades ago for the express use of automotive repair. If the project is going to use Washington Street for LRT, our building will no longer be able to support tenants for its original use. Therefore we need to be fully compensated for the loss of use for the buildings. All three of the tenants will have to be relocated under this LRT plan. (See attachment DEIS Appendix D, Comprehensive List of Potential Property Acquisitions page D-10)

Also, on page 2-36 in regards to the Washington-Broadway Couplet, we own the block at 14th and 15th between Washington and Main. There are two primary access points on Washington Street. If there is a curb or raised rail, patrons will not be able to access this property from Washington Street.

B-014-010 | In Appendix D, there are over 60 properties without an address. That made researching for our properties rather difficult. There is also the potential we may have missed something. In the Final Environmental Impact Statement it would be helpful to have all of the addresses listed.

B-014-011 | The DEIS is vague to stakeholders. When will discussions begin that involve specific stakeholders?

Sincerely,


Oliver Hidden William Hidden Monte Hidden

easement. The Stipulation item B. states "The service road as constructed and any future roadway connected thereto on state right of way shall be a public road. The abutting property owners and the State of Washington shall have the same legal rights in the service road and future roadway as they had in West Reserve Street prior to its removal..." This Stipulation does not convey an easement right, however, it does allow a right to access the service road.

B-014-006

Based on the minimized property requirements, it is not expected that the construction or operation of the Columbia River Crossing project would displace parking spaces at this location.

B-014-007

The playground associated with the day care on the Providence Academy property is not expected to be impacted by the project.

Reconstruction of the Evergreen Boulevard overpass could take up to one year. During this time, Evergreen Boulevard would be closed, but detour routes would be established and well signed.

Throughout the planning process and through construction, the CRC project is committed to minimizing construction-related environmental effects. Potential temporary effects, and potential measures to avoid/reduce those effects, were described in each section of Chapter 3 of the DEIS. Measures the CRC project proposes to mitigate these effects are described in each section of Chapter 3 of the FEIS. These mitigation measures have been developed through consultation with federal, state, and local agencies, and community stakeholders. These measures are intended to ensure that construction activities will comply with regulatory requirements and will minimize impacts to people living and working in the project area during construction.

3.3.4 Temporary Effects

Temporary Property Easements

Construction easements would be required for the temporary staging of equipment and materials during construction. These easements are separate from the acquisitions and displacements reported elsewhere in this section because they are temporary uses. Property used during construction could be returned to its owner once construction is complete, or alternatively, if the site is accessible to transit, the land might instead be purchased at a fair market value and then developed with transit-oriented uses, such as retail, residential, or mixed use.

Staging or construction activity can often be accommodated in existing right-of-way, but an estimated 1.5 to 3 acres of temporary easements could be required near the proposed transportation improvements. Additional land may be permanently acquired for staging for transit construction and then later developed as described above. Preference would be given to locations that are vacant or could be obtained or leased from willing owners.

Along the transit alignment, it may be necessary to seek temporary construction easements or small permanent easements on adjacent properties to allow construction workers to enter the first several feet of a property while rebuilding the sidewalk in front of the property or to place specific elements such as an overhead catenary pole behind the sidewalk.

It is too early in the design process to know whether a large casting yard and staging site will be needed for the construction of the river crossing. However, if the pre-casting construction technique is used, desirable site characteristics are likely to include:

- A large (at least 15 acres) open site suitable for heavy machinery and casting of bridge segments,
- Waterfront property with access for barges to convey material to the construction zone, and
- Roadway or rail access for landside transportation of materials by truck or train.

The acquisition of a large casting yard and staging site could result in additional displacements, which would be appropriately mitigated at described in the Potential Mitigation discussion below.

Activities occurring on any of the potential casting and staging sites would be in accordance with federal, state, and local environmental regulation and land use code. Depending on the construction requirements of the project, the project may need to obtain variances for some or all of these local codes.

AIRSPACE RIGHTS AND SUBSURFACE EASEMENTS

As the construction plan is developed, the project will need to identify all locations where temporary airspace rights or easements or subsurface easements would be required. A temporary easement conveys certain property rights, but not ownership, to a parcel of real estate for a defined period of time. The temporary easement provides its holder with specified rights to use the easement area. Temporary airspace easements

B-014-008

Following the selection of the LPA in July of 2008, the CRC enlisted the help of community members - residents, business owners, transit-dependent populations and commuters - who had interest in light rail planning to form the Vancouver Working Group (VWG). The VWG met regularly to develop recommendations and provided feedback to the CRC project, the City of Vancouver and C-TRAN on transit alignments, proposed station locations and design, security and park and ride facilities in downtown Vancouver. Following approximately 5 months of coordination, in addition to public open houses and walking tours, the VWG recommended the Washington-Broadway Couplet through downtown Vancouver to C-TRAN and City of Vancouver staff. Per the Vancouver Working Group Final Report (October 2009), this alignment was preferred largely because it spread the potential impacts and benefits across two streets, as opposed to concentrating them on a single street. This alignment was adopted as part of the LPA and is analyzed in the FEIS. For more information on the transit alignment decision-making process please see Chapter 2 (Section 2.7) of the FEIS.

B-014-009

The light rail alignment on Washington Street will run on the east side of the street. The driveways that access the west side of Washington Street that you reference in your comment will not be affected. Access to the block between 14th and 15th Street between Washington and Main will still be by the access points on 14th and 15th Streets.

Individual property acquisition costs will be established through an independent appraisal process to ensure the owner receives fair market value of the property. This process is governed by the federal Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (Uniform Act). To date, the project has not conducted specific property valuations, which is necessary to determine the individual property acquisition cost. For the Draft EIS, the project team made

Providence Academy, 400 E Evergreen Street – Alternatives 2 and 3 (the replacement crossing) would require acquisition of 0.27 acre of the eastern edge of the parcel containing this eligible historic resource, as illustrated in Exhibit 5.3-10. The land that would be acquired is adjacent to I-5 and contains parking spaces and landscaping. Highway construction would not remove any historic or non-historic buildings from the site.

Exhibit 5.3-10
Providence Academy



DIMENSIONS ARE APPROXIMATE.

general assumptions about the cost of acquiring property based on criteria such as rough estimates of square footage, land use, and possible demolition costs, to compare the costs of alternatives in the Draft EIS, and made similar assumptions to inform the financial planning in the Final EIS. These estimates do not reflect what property owners will actually receive as compensation, and therefore were not distributed for review.

Estimated costs are reported by project alternative and by project component (highway and transit) in Chapter 4: Financial Analysis in the DEIS, and in Chapter 4: Financial Analysis of the FEIS.

B-014-010

Not all parcels are assigned property addresses by the Clark County Property Assessor. Parcel identification numbers were included in Appendix D so that readers could identify each potentially impacted property.

B-014-011

Although the project team meets individually with property owners upon request, to date, the project has not conducted specific property valuations which is necessary to determine the individual property acquisition cost. Property owners impacted by the CRC project will be individually contacted by CRC staff prior to the start of the appraisal process. The schedule of appraisals and acquisitions is dependent on the project construction schedule, which is outlined in Chapter 2 of the FEIS.

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rt for House of Providence - Academy at 400 E Evergreen Blvd, Vancouver, WA 98660

SECTION Field Site No. 39220000 OAHP No.: 150
House of Providence - Academy Common Name:
400 E Evergreen Blvd, Vancouver, WA 98660 Comments: 64/313R
Ownership/Range/EW Section 1/4 Sec 1/4 1/4 Sec Quadrangle VANCOUVER UTM Reference
02R01E 27 Zone: 10 Spatial Type: Point Acquisition Code: Unknown
Sequence: 1 Easting: 525880.9002 Northing: 505294
Plat/Block/Lot Supplemental Map(s)

SECTION Survey Name: CRC
osalind Keeney Date Recorded: 6/28/2007
Owner Address: City/State/Zip:
Listing Resource Status Comments
No. Survey/Inventory
National Register



View of South facade taken 6/
Photography Neg. No (Roll No./Frame No.): Evergreen_0400_a.jpg
Comments:

SECTION
Education - School
Commerce/Trade - Business
No. of Stories: 3
Brick
Slight Changes to interior: Style Form/Type
if cladding: Intact Changes to other: Colonial - Georgian Revival Other
Materials: Intact Other (specify):

erty
rt for

House of Providence - Academy at 400 E Evergreen Blvd, Vancouver, WA 98660

Foundation	Roof Material	Roof Type
Unknown	Unknown	Gable Dome

DESCRIPTION

Other

Date Of Construction: ca.1873

Architect: Mother Joseph

Builder:

Engineer:

Property appears to meet criteria for the National Register of Historic Places: Yes

Property is located in a potential historic district (National and/or local): Yes - National

Property potentially contributes to a historic district (National and/or local): Yes

The Providence Academy was listed on the National Register in 1978. It is significant for its role in the development of Vancouver, for its architectural distinction, and its association with Mother Joseph of the Sacred Heart, by all accounts a dynamo of a woman with a nearly limitless supply of talent and energy.

The House of Providence, also known as the Providence Academy, or simply, the Academy consists of a campus including several buildings bounded by I-5 in the north, C Street in the west, and Evergreen Boulevard in the south. The Academy's main building is a three story brick structure whose construction style is loosely Georgian, with a pedimented central volume flanked by wings featuring continuous balconies on all three levels. The windows are primarily 4/4 wood topped by segmental arches. Decorative elements, stone keystones, niches, cartouches, and other trim are mostly limited to the central volume. The whole arrangement is topped by an 8-sided domed lantern. Originally cruciform in plan, the structure was expanded to the west in 1891, giving it more of a lop-sided T-shape. Evidently the structure was chiefly designed by Mother Joseph of the Sacred Heart, a member of the Sisters of Providence. The main building faces south and is fronted by a formal approach with drive, lawns, trees, and shrubbery. A building to the west of the approach and in front of the west wing, dates to 1976. An attempt was made to blend this new building into the historic fabric by using brick cladding and similar window forms. The Academy also includes several outbuildings including the 1930s gymnasium, located to the east of the main building. The laundry, located to the northeast of the main building dates to as early as the 1870s. The 1910 boiler house, attached to the east of the laundry, includes the Academy's trademark smokestack with its complex arrangement of brick. The north portion of the Academy complex no longer includes grounds, but is a sea of parking.

Source: .entz, Florence K. National Register of Historic Places Registration Form for the House of Providence. January 1978. Available online from: <http://www.dahp.wa.gov/gis/pdfs/562.pdf>, accessed 8/15/2007.

Printed on 4/19/20

AP

otos for: House of Providence - Academy

at 400 E Evergreen Blvd, Vancouver, WA 98660



facade taken 6/28/2007
 Neg. No (Roll No./Frame No.): Evergreen_0400_b.jpg

View of _____ taken
 Photography Neg. No (Roll No./Frame No.):
 Comments:

_____ taken
 Neg. No (Roll No./Frame No.):

View of _____ taken
 Photography Neg. No (Roll No./Frame No.):
 Comments:

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Exhibit 3.11-21 (page 1 of 2)
Transit Noise Impacts and Potential Mitigation in Northern Vancouver



COLUMBIA RIVER CROSSING DEWET ENVIRONMENTAL IMPACT STATEMENT - APPENDIX D

TID/Serial Number	Address	Land Use	Estimated Acquisition Level	Alternatives 2 & 3: Replacement River Crossing	Alternatives 4 & 5: Supplemental River Crossing
47277000	no address available Vancouver	Paving	Full	X	X
47280000	no address available Vancouver	Paving	Full	X	X
47291000	4500 WASHINGTON ST Vancouver	Retail/Services	Partial w/o displacement	X	X
50090000	no address available Vancouver	Retail/Services	Partial w/o displacement	X	X

* All property acquisition data in this table and the cost estimates given the information available at this time. As the project progresses and a locally preferred alternative is identified, the reported acquisition may change.

Mill Plain station would include space for local buses, providing connections between high-capacity transit and the local bus network.

Exhibit 2.3-18
Downtown Vancouver, Two-Way on Washington Transit Alignment Option



CONCEPTUAL DESIGNS / DIMENSIONS ARE APPROXIMATE.

- A couplet on Washington and Broadway Streets would route northbound travel on Broadway Street and southbound travel on Washington Street. A replacement river crossing would allow the transit guideway to connect to Broadway as far south as Sixth Street, although it could use Seventh, Eighth, or Ninth Street instead. A supplemental crossing would require the transit guideway to use Seventh, Eighth, or Ninth Street. Light rail would likely run on the left side of the street. Bus rapid transit would run on the right side of the street. One or two lanes of vehicular travel, and left-turn lanes would be next to the transit guideway. On-street parking would be located on blocks without stations.

Exhibit 2.3-19
Downtown Vancouver,
Washington-Broadway Couplet Transit Alignment Option



CONCEPTUAL DESIGNS / DIMENSIONS ARE APPROXIMATE.