

To: Columbia River Crossing Project

From: Dvija Michael Bertish, Rosemere Neighborhood Association, Columbia Riverkeeper

Re: Public Comments on Draft EIS for proposed Columbia River Crossing Project

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At the time of production of these comments, the local C-Tran Board, Columbia River Crossing Task Force, Metro, and Vancouver City Council have all indicated that their Locally Preferred Alternative is the full replacement bridge with light rail service into Clark County. For the record, we feel it is important to note that agency choice of this Locally Preferred Alternative took place prior to the exhaustion of the public comment period. Thus, it appears that the agencies working on this project are not taking into consideration all of the public comments received, and this is not in keeping with NEPA review. Public comments should have been received, tabulated, and responses provided prior to the choice of locally preferred alternative. Furthermore, public testimony was provided asking for an extension of the public comment period due to the complexity of the Draft EIS, and the Columbia River Crossing Project denied this request without explanation. The Draft EIS does not outline required procedures to apply for extension of the public comment period, and this is also not in keeping with NEPA review. We understand the difficulties in the project timeline to make application for federal funding for this project in August 2008, however, federal grant application deadlines should not have been allowed to trump the public comment process. This was bad planning on part of the Columbia River Crossing Project.

That being said, we recognize the need to improve the I-5 Crossing. However, we do not believe that adequate planning has been achieved relative to the burden of cost for this project. It is our position that should a replacement bridge be built, the number of through lanes should remain 3 in each direction, and all auxiliary lanes should be kept to a minimum. A 12 lane bridge is far too costly and far too intrusive. I-5 shrinks to only 2 lanes in various places throughout the Portland area. Building a 12 lane bridge without widening the I-5 corridor in Portland will not alleviate congestion. A vast replacement bridge will only improve commute time from Portland to Vancouver by about 2 minutes, and congestion will continue to back traffic up over the bridge even after it is built. Spending \$4 billion plus for a super-bridge is irresponsible at this juncture.

It is also our position that the light rail portion of this project should not have been pursued without a public vote. Since the public will be required to fund maintenance and operations costs for light rail, and funding for this will be in the form of an increase in local sales tax, or possibly property tax, the public's permission should have been sought before many millions of dollars were spent studying this option. It is our position that C-Tran should rely on bus service rather than light rail. Bus service is more flexible. We do not agree that bus service would be more costly or less effective than light rail.

The installation of light rail service will have adverse impacts throughout residential and business districts in Vancouver. Construction will close access to many businesses that are already suffering financially. Bus service would not have this affect.

The proposed light rail system will be powered by fossil fuel and coal, both of which severely pollute the environment. Coal is derived from mining mountains, and coal powered generating plants are not yet able to sequester greenhouse gasses as required by Washington State's emissions standards as signed into law by Governor Gregoire. A new coal fired power plant has been denied a building permit in Kalama because it could not comply with sequestration. That technology may not be implemented until 2020. The existing coal plants in our region cause serious air and water pollution, and those generating plants are not in compliance with state standards. Coal is a long way from being a safe resource in our community. If light rail is to be built, it should be modeled after existing systems, such as those found in Singapore, where the trains generate their own power with movement, and solar collectors are employed. Without solar power and self-generating power, the operation of light rail could end up costing the local taxpayers far too much in the coming years. Construction and operations costs of light rail have crippled a transit system in Colorado recently, and light rail had to be discontinued in order to avoid bankrupting the bus system. There is insufficient capital budget forecasting in the Draft EIS to ensure that severe cost overruns will not affect the Columbia Crossing.

Our organizations have made several attempts to get more information on budget items for this proposed project. For example, we asked for estimates of what it will cost to pay for all the property takings as indicated in Appendix D. C-Tran, City of Vancouver, and Crossing Staff have all indicated that these estimates are all "rolled into" the overall budget forecast, but they cannot be backed out. This explanation is very strange, and only indicates that the budget has not been analyzed sufficiently for the purposes of determining financial impacts on the community.

Rosemere Neighborhood Association met several times with Columbia River Crossing Staff in 2007 and 2008 to make our concerns known. We clearly indicated that it would be unacceptable for the project to mimic what happened under the I-5 Trade and Transportation Committee -- local headlines "In the Way on K" were the sole notice provided to our neighbors that their homes were being considered for removal to widen I-5. None of the homeowners were aware or even included in the public process at the time. Rosemere specifically asked Crossing staff to make sure this did not happen again, and Mr. Ovington promised in writing in 2007 that Crossing Staff was going to go door-to-door to ensure there would be no repeat of the adverse impacts as experienced in prior years. Mr. Ovington's promise was broken, and the Draft EIS was released, clearly identifying homes and businesses that would be impacted. Volunteers went door-to-door once the draft was published, and many businesses and homeowners were still unaware that their properties had been marked by the Crossing Project, and there was tremendous concern. NEPA requires that individuals that will be directly impacted by such a

project are to be contacted directly -- once again, this did not happen. The Crossing Project's failure to include affected property owners has caused Environmental Justice impacts, and federal funds sought for this project may now be in jeopardy under these circumstances. Federal dollars cannot be allotted to projects where Environmental Justice impacts adversely impact specific communities, as this project has now done.

The proposed route for light rail and the terminus have yet to be identified. From what we can tell, Clark College is a strong possibility for location of the terminus. Rosemere (later renamed Rose Village) is immediately adjacent to Clark College to the north. The Draft EIS does not consider traffic impact to residential neighborhoods such as Rosemere where neighborhood arterials will become drag strips and traffic will increase as commuters cut through our neighborhood to reach a park and ride. Since Rosemere is bordered by I-5, Fourth Plain Blvd, SR-500 and Grand Blvd, our neighborhood will experience tremendous impacts from construction, and increases in future traffic. The Draft EIS does not mitigate this problem and does not offer solutions to ensure traffic safety in our neighborhood. We already experience rush-hour speeding as traffic cuts through our neighborhood to reach the various arterials and highways.

The Draft EIS mentions several instances where construction will impede groundwater and surface water. However, there is no hydrogeological study provided to analyze groundwater contaminant affects, existing plumes within and around the construction zone, or ground/surface water migration. This is a huge oversight, and the draft, therefore, is technically deficient. The draft clearly states that the Columbia River will be dewatered for construction, and that fish will be killed, but it does not qualify sufficiently the mitigation measures needed to alleviate this stress. The stretch of the river that will be affected by the project is riddled with contaminants such as PCBs. The draft does not indicate how it will prevent the mobilization of contaminants that will occur with dredging or disturbing of sediment. The Vancouver Lake Flushing Channel is downstream of the project site -- mobilized contaminants will be carried downstream into the flushing channel, and will then discharge to Vancouver Lake, which is a closed system. Vancouver Lake is currently under consideration for superfund status by the EPA, and Columbia River Crossing Project needs to acknowledge this development, and also how it can prevent contaminants from worsening the condition of Vancouver Lake. The list of contaminant sources within the geographical area of the project is inaccurate and incomplete.

The draft states that there is no TMDL for Burnt Bridge Creek; however, a TMDL has been initiated by Ecology in 2008. Burnt Bridge Creek feeds directly into Vancouver Lake, and sediment/contaminant load carried by the creek into the lake would have serious adverse impacts to the lake. Columbia Crossing Project needs to coordinate with Ecology to ensure that construction will not degrade the lake or the creek and will not imperil the TMDL program underway for the creek.

The draft acknowledges the Sole Source Aquifer Designation for the Troutdale Aquifer, and that the project is within the designated aquifer area. The draft wrongly states that it is up to EPA to ensure that the project does not harm the aquifer or public/environmental health. The draft EIS is lacking so much hydrogeological information that it would be impossible for EPA to determine if the aquifer were at risk because of the project. The draft clearly states that contaminants will be injected into groundwater during construction, but does not identify how, how much, or provide water movement models. As a whole, the draft is void of much needed environmental baseline data to help qualify environmental conditions and impacts from the project. Thus, we cannot support this draft EIS as a viable document that will sufficiently produce an adequate final study. We feel the draft should be redone and the public comment process re-initiated. It is not the EPA's job to ensure that the aquifer will be protected; it is the Crossing Project's job to ensure that sufficient work is done to ensure protection of the vulnerable Sole Source Aquifer.

There is no mention of the impacts that will be sustained by small businesses due to tolling the bridge. Tolls will adversely impact Clark County businesses because informal polls already show that Portland consumers will cease to support the Vancouver business market once tolls are implemented. This impact needs to be mitigated.

There is no mention of air quality impacts to residential areas adjacent to the construction area. There are elevated incidents of asthma in children adjacent to transit corridors, and this is not documented or analyzed in the draft. We do not agree that light rail will sufficiently mitigate air quality contaminants in the project area.