



November 12, 2008

To: Ms. Vera Katz, Chair
Willamette River Bridge Advisory Committee
TriMet Portland-Milwaukie Light Rail Project
via DeeAnn Sandberg
sandberd@trimet.org

From: Capt. Peter L. Richards, Chair
Lower Columbia Region Harbor Safety Committee (LCRHSC)

Re: Comment on South Corridor Portland-Milwaukie Light Rail Project; Willamette River Crossing

cc: Austin Pratt, USCG Seattle
via Lt. Katherine L. Jackson, USCG Sector 13, Portland
katherine.l.jackson@uscg.mil

cc: Dave Unsworth, TriMet
via DeeAnn Sandberg
sandberd@trimet.org

cc: Non-recused members of the LCRHSC Managing Board

Dear Ms. Katz:

Since we last submitted public comment (on June 19) we have had several productive meetings with members of the Willamette River Crossing planning group and would like to express our appreciation for their hard work and for the time they have given us. We note that there have been changes in plans that will facilitate additional horizontal navigational clearance and may allow better vertical navigational clearance. As stated in our previous comments, we believe that a 75 foot vertical navigational clearance presents an unreasonable obstruction to commercial navigation in this reach of the river.

We understand that it is difficult to decide exactly how to make the tradeoff between navigational clearances and project cost. We note however the unfortunate Shanghai cruise ship terminal (now inaccessible to a third of the cruise ship fleet) and the difficulties experienced by Concord Naval Weapons Station in sailing even partly loaded military vessels, all caused by bridge spans with insufficient clearances. In both of these cases, bridge design did not properly ascertain navigational usage. So, it would appear wise to err in favor of more rather than less navigational clearance.

In our view, there are several kinds of maritime traffic with potentially different sets of clearance needs that should be considered.

Routine Traffic

We believe that shutting out access to the upper river for any significant part of a day to current or future routine traffic would impose an unreasonable obstruction to navigation.

Periodic Exceptional Traffic

We can predict with 100% surety that the Sellwood Bridge will be replaced during the life span of the Light Rail Bridge and we can reasonably expect a handful of similar projects. The Light Rail Bridge should be designed so that it does not present an unreasonable obstruction to navigation for such projects.

Emergency Traffic

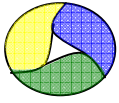
The Light Rail Bridge will survive multiple and inevitable river emergencies such as the 1996 flood. As others were required to learn during Hurricane Katrina, it is necessary to design for the worst and hope for the best. Navigational clearances that restrict access to emergency waterborne equipment would impose an unreasonable obstruction to navigation.

Future Commerce Traffic

While this kind of traffic cannot reasonably be predicted, the imposition of vertical clearances less than the bridges above and below should be justified in the long, not the short view. The Light Rail Bridge is a legacy project, and that legacy should at least be one of successful planning.

We do not know the exact methodology used in your determination of optimal clearances to date. In our view, vertical clearance requirements should be determined by an analysis of three separate values:

1. River Stage
2. Vessel Air Draft
3. Safety Buffer



We believe that each of the above values should be assessed independently, should be defensible and should be mutually agreeable. Our tests for defensibility with respect to the above values are as follows:

River Stage

What is the greatest height of water over 0' CRD (or other relevant datum), above which we would expect river traffic to be curtailed for safety reasons (such as bank preservation in a flood)? This value refers to the maximum river depth that will support required navigation.

Vessel Air Draft

What is the maximum height of vessels in all categories that can reasonably be expected to navigate under the bridge for its life cycle?

Safety Buffer

What is the minimum acceptable clearance between the topmost point of the highest vessel and the bottommost point of the proposed bridge in its navigable channel? This number must account for variations in and accuracy of datum, as built bridge construction compared to design, and whatever reasonable clearance is required by operators to assure that their vessels are in fact no higher than expected.

We have been involved in the discussion of vertical and horizontal clearance but do not wish to suggest that our discussions would or could replace the investigative process that is required to satisfy the above requirements. We do not know, one way or the other, if the studies that have taken place so far have satisfied those requirements. We sense that they may need to be revisited.

The bridge clearances (both vertical and horizontal) for the Marquam and the Ross Island Bridge are now a matter of studied record. We appreciate (from the clear explanation provided by Mr. Dave Unsworth at our last General Membership meeting) the impact that additional height has on landing the kind of bridges now under consideration on either side of the river. We also appreciate that the inclusion of various accessibility options can have a favorable impact on both public acceptance and financing options. Having spent time looking at the river in the area where the proposed span will be built, it becomes more apparent that any restriction in current navigational clearances should have compelling justifications. Previous generations have faced the same issues and made very tough decisions in favor of the preservation of more rather than less navigability. We note that Seattle is now completing a light rail leg from the airport to the city center, a large portion of which is elevated. We therefore believe that it is appropriate to look at the bridge landing zones more carefully.

It is time to take a step back and revisit any technical approach that would serve the best interests of all of our transportation needs, not excluding the possibility of draw, swing or lift spans. There is no other or better time to give these factors our best thinking and fullest consideration. Given that the Sellwood Bridge is nearing the end of its life span, there will be opportunities to open up further stretches of the Willamette to future water transportation options. What can we do now to preserve or even improve our future options? This is the time to consider our whole transportation future and to better understand the lasting message that this bridge will leave.

Let's find out what is needed to preserve our current clearances, and work downwards only if necessary.

Thank you for your consideration. We stand ready to provide whatever support we can and we look forward to attending the November 20 meeting.

Very truly yours,

Capt. Peter L. Richards

Chair, LCRHSC
805 Broadway, Suite 410
Vancouver, Wa. 98660
peter.richards@portsamerica.com
503 519 2161

Attached: Previous public comment submission



June 19, 2008

To: trans@oregonmetro.gov
Metro; Portland-Milwaukie Light Rail Project
600 NE Grand Avenue, Portland, Oregon, 97232

From: Capt. Peter L. Richards
Chairman, Columbia Region Harbor Safety Committee (CRHSC)

Re: Public Comment on the Draft Environmental Impact Statement and Section 4(f) Evaluation and the South Corridor,
Portland-Milwaukie Light Rail Project

cc: Capt. Fred Myer, COTP, USCG Sector Portland (via Lt. William Taylor)
Capt. Paul Amos, President Columbia River Pilots, Vice Chair CRHSC
Ms. Heather Moats, Port Manager - Inchcape Shipping Services, Secretary Treasurer, CRHSC
Lt. William Taylor, USCG Liaison, CRHSC
MST1 Lucia Mack, USCG Liaison, CRHSC
Members of the CRHSC Bridges Sub-Committee

To whom it may concern:

The CRHSC is comprised of commercial and private waterway users; federal, state and local waterway regulators and others interested in the preservation and use of the waterways in our area of responsibility.

Goals of the CRHSC include:

- Ensuring the continuation and improvement of safe, reliable, cost-effective maritime transportation,
- Enhancing the safety of waterway recreation, and
- Fostering prudent management practices for our waterways.

The CRHSC works to accomplish its goals by providing a forum for the cooperative coordination of actions by all concerned, committed and informed stakeholders. The CRHSC Bridges Sub-Committee evaluates and acts on issues of concern relating to bridges over our navigable waterways under the direction of the CRHSC Managing Board. The South Corridor, Portland-Milwaukie Light Rail Project has become a focus of attention of the Bridges Sub-Committee.

This letter is to notify you of our specific and continuing interest in providing meaningful public comment during all stages of planning and implementation of the project. Therefore, as the project moves forward, please keep us informed in advance of all:

1. Progress concerning the project,
2. Opportunities for us to partner with your planners, and
3. Opportunities to provide public comment.

We also invite you to nominate a representative from your organization to the Bridges Sub-Committee. Please let us know if you will take us up on this offer. Our comments follow.

Thank you for your attention to this matter.

A handwritten signature in black ink, appearing to read "Peter L. Richards".

Capt. Peter L. Richards

Chairman; Columbia Region Harbor Safety Committee
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Cell: 503 519 2161



June 6, 2008

To: The Managing Board of the Columbia Region Harbor Safety Committee
From: The Bridges Sub-Committee

Re: Initial Public Comments on the Draft Environmental Impact Statement and Section 4(f) Evaluation and the South Corridor, Portland-Milwaukie Light Rail Project

Public Comment

Our focus for the Portland-Milwaukie Light Rail project is the proposed Willamette River Crossing and its impact on river users. We are not offering specific comments on the proposed bridge design since there is no design as yet. We do offer our general comments and also request that we be involved in the design and planning, particularly in relation to the following:

1. Bridge Height

The SDEIS has proposed a bridge clearance of 75 feet, although the current standard for this area is 120 feet. Many of our members have raised objections to the 75 foot height, because it constricts the current use of the river south of this point. The SDEIS eliminates a large number of current and future river users. We are specifically concerned about the commercial use for large vessels, tugs and crane barges for such situations as emergency response to floating homes and bridges, as was the need during the flood of 1996; construction projects, such as the repair or replacement of the Sellwood Bridge, and standard daily business during high water periods.

An advertised air draft of 75 feet does not mean that a vessel with an air draft of 75 feet can safely navigate the bridge. Navigational bridge clearance must factor in tide and a reasonable clearance margin above the vessel. Such factors would impact many of the vessels on the SDEIS survey that are currently considered as unaffected.

At this time the CRHSC will not support a bridge clearance of 75 feet and recommends exploring other options such as a draw bridge, a swing bridge or a taller bridge.

2. Channel Alignment and Width

The channel alignment and width between the bridge pilings are highly important factors in safe navigation and will need to be addressed fully and satisfactorily with the river users during the design phase.

3. Expanded River User List

The SDEIS River User List represents vessels in different height categories, but does not take into account all potential current and future vessels within those categories. There are currently more tug and crane barges in service than are represented on the SDEIS list. This increases the number of vessels impacted by the proposed height of 75 feet.

Other areas to consider would be an increase of taller personal watercraft such as sailboats with the development of the Portland South Waterfront and new technologies for vessel propulsion, including solar panels and wind turbines which can make vessels taller.

4. Rising River Level

The SDEIS does not consider the potential impact of Global Warming and rising river levels. This could have a long term impact on river use. Higher river levels reduce the number of vessels able to use the river.

5. Construction Impact

Finally, we believe it is important to conduct an analysis of the impact during the construction of the bridge upon river users that addresses river closures, traffic disruptions and clearance height and width restrictions.

Respectfully submitted,

Dennis Corwin
Bridges Sub-Committee Chairperson