

JANTZEN BEACH MOORAGE, INC.



June 30, 2008

Columbia River Crossing (CRC) Attn: Heather Gundersen 700 Washington Street, Suite 300 Vancouver, WA 98660 1881 N. JANTZEN AVE PORTLAND, OREGON 97217-7808

This letter provides the comments of Jantzen Beach Moorage, Inc. [JBMI] regarding the Columbia River Crossing Draft Environmental Impact Statement (DEIS), May, 2008. JBMI is the floating home moorage located on Hayden Island / North Portland Harbor most impacted by the CRC project.

Residents of JBMI are intimately familiar with the traffic congestion and safety hazards within the project area. We have supported the CRC project because every day we experience impaired air quality, travel delays, and accident risks from the existing I-5 project area. JBMI's preferred alternative is Alternative 3 with adjacent LRT alignment. This alternative has a lesser impact on JBMI and the entire island than the offset HCT. We support extension of light rail to Vancouver; many of us shop and do other business there regularly.

While JBMI supports the CRC project and Alternative 3, we are disappointed that our hours of volunteer time meeting with CRC, hosting them at the moorage, writing comments, and attending and testifying at countless meetings has resulted in a DEIS that fails to adequately portray and address the impacts to our floating home community. We feel the full impact on Oregon housing and residents is understated throughout the DEIS and will be misunderstood by stakeholder agencies, the states of Washington & Oregon, the federal government, and other decision-makers. We believe this is a serious error that increases JBMI's risks from the project.

Therefore, we request that the Final EIS reflect accurately the facts regarding the floating community (JBMI) and interim measures be immediately implemented to ensure that stakeholders and the general public have a better understanding of the specific impacts to Hayden Island housing.

Our comments are organized into two groups: 1) disclosure of the floating home community in the DEIS and 2) consideration of river influences in the technical analysis.

- Impacted floating homes should be fully disclosed and addressed in the narrative, data and graphics. They need to be treated as displaced and affected residences just as land-based housing is treated. Specific comments include:
 - Appendix D states "no address available". Floating homes have street numbers consistent
 with land-based numbering systems. Each home receives a Multnomah County tax
 statement each year plus each home is licensed, as required, with the State of Oregon.
 Appendix D and the Acquisitions Technical Report need to be updated to reflect impacted
 household addresses.
 - Floating homes' personal property tax numbers should be listed in Appendix D. It is insufficient to reference only the real property tax lots.

Columbia River Crossing June 30, 2008 Page 2

- Maps and graphics, in the DEIS and used for presentations, need to show the outlines of the moorage infrastructure and individual floating homes in N. Portland Harbor. This information is available through aerial photography. This impacted housing cannot be left off just because it represents anomalies to established FTA or FHWA practice.
- We question the basis for the statement in mid-page 7-2 of the Acquisitions Report that "some floating homes do not have the structural integrity to support a move, either within or between marinas." We feel it portrays our housing stock as dilapidated and it is not.
- No criteria or basis for identifying 'displaced' homes are offered in the DEIS. How were
 displaced houses identified? Construction of a transit line and freeway through a
 residential area impacts more homes than just those directly under the structure. These
 impacts, including declining property values, impacts to view corridors and overall
 intrusion, need to be addressed.
- The Environmental Justice Technical Report appears to misrepresent household demographics at JBMI. We have 177 floating home slips, -177 households. On page 4-16, the EJ Technical Report states that 129 surveys from JBMI individuals were returned from 88 households. [It does not say how many total surveys were originally mailed.] It appears that over forty respondents were providing information on income and household characteristics that was also being provided by another dweller in the same household. This, combined with overall response rate of 50% [88/177], would be expected to result in misrepresentation of the moorage demographic. We believe in this case it exaggerates the percentage of households with incomes over \$50,000 [stated as 74%] and perhaps other demographic characteristics. We request that the text describe the limitations of the data and that household characteristics and income be reported only once for each household. The accompanying statistics and graphics in the DEIS should be corrected as warranted.
- Environmental Justice Technical Report, pages 4-16, footnote 2 should read; *JBMI is the non-profit homeowner association that owns and operates the moorage*.
- Economic Technical Report: Overall, the report ignores economic losses and impacts to
 individuals. Its emphasis on businesses may be consistent with FHWA policy but we do
 not believe it is consistent with FTA policy. Economic losses will be experienced by those
 homeowners who lose sales and equity value because their home is now within twenty
 feet of a new bridge. Displaced homeowners who face increased fees at a new moorage
 will experience economic losses. These individual economic losses should be noted and
 long-term mitigation measures identified.
- Economic Technical Report, Exhibits 1-2, 1-4A, 5-11. It is not clear whether the property tax revenue impacts described for Segment A include loss of property tax revenue from the moorage and individual floating homes. The text only references business and commercial property. We assume that JBMI's upland and moorage infrastructure is included with other commercial property. Individual floating homeowners pay property tax through the personal property tax structure but the revenues are destined for the same government agencies as real property taxes. Please confirm whether residential property tax revenue, including those of floating homes, is included in the exhibits and analysis throughout the report. On pg 2.9, please confirm whether the assessed tax values of the displaced floating homes are included in the Multnomah County tax information and the DEIS.
- Acreages throughout the report do not appear to include the affected floating homes and infrastructure of JBMI. This understates the existing conditions, alternatives' impacts, and the overall impact to Oregon.
- Chapter 3, Exhibit 3-3.1 needs to add specific reference to median floating home prices and other housing values west of I-5 where the largest impacts are expected under any build alternative. Referencing only housing values east of I-5 is inadequate.

Columbia River Crossing June 30, 2008 Page 3

• Floating homes do not appear to be included in the summary tables of Acquisitions in Chapter 3 or the Acquisitions Technical Report. This seriously understates the impact on Oregon residences and housing stock.

The Neighborhoods and Population Technical Report Section 4.2.3.1.1 appears to use U.S. Census Bureau data that does not include floating and manufactured homes on Hayden Island. The Neighborhood and Environmental Justice Effects Summary in Chapter 3 portrays Hayden Island based on this Technical Report. Therefore, Chapter 3 does not

accurately reflect the floating home community.

- JBMI notes that the Acquisitions Technical Report identifies some options for floating home relocation on page 7-2. We emphasize that floating homes are mobile and present unique opportunities as well as challenges for activities under the Relocation Act. We expect CRC to creatively investigate these opportunities and not let rumors regarding permitting difficulties affect their efforts. Relocation of floating homes to another moorage will only result in the shifting of existing impacts to a new location; new impacts will be minimal. JBMI expects to work collaboratively with the CRC to develop a relocation strategy that reflects the floating home community's mobility and uniqueness.
- 2) The impact analysis needs further refinement to account for the dynamic river environment.
 - Noise Technical Report: section 2.3.1.4: Propagation: The section fails to address the
 decrease or attenuation of noise to floating homes as river levels rise and fall. We cannot
 review the noise analysis without knowing the river levels during baseline data gathering.
 - Appendix A: river levels need to be noted for all noise monitoring events. The USGS
 Vancouver gage should be used. If linking the existing data to river levels shows noise
 levels were measured during lower than average flows, additional measurements at more
 representative river levels are needed.
 - It appears that baseline noise monitoring sensors were placed on houses at the end of A and H Rows. Although closest to the existing N. Portland Harbor Bridge, we believe noise propagation to A Row is mitigated by the existing I-5 Bridge structure and safety walls. We recommend additional noise baseline data be obtained and include at a minimum sensors at the ends and mid-sections of Rows B and C.

In addition to the above specific comments, JBMI believes the CRC DEIS should reflect throughout that it has a common and thorough understanding of the physical and economic impacts to JBMI. The inconsistency between sections on items related to JBMI leads us to believe this is not currently the case. We want to reiterate that Jantzen Beach Moorage Inc. is a non-profit homeowner association under the laws of Oregon. During the 1990s we worked hard to purchase our moorage from Safeco Properties and implement a management structure that afforded individuals lower monthly fees and more control over their living environment. Homeowners facing displacement are also facing losing those long sought Association benefits. At JBMI, 177 owners have exclusive use of a slip and share common property and open water space. Loss of any part of JBMI affects all owners, not only those displaced. We have made significant investments in our infrastructure, including uplands parking, storage and security. Our financial and debt structure is based on spreading the operating, maintenance and capital improvement budgets over 177 individual owners. We recognize there will some economy of scale savings if floating homes are displaced, but we do not believe such savings will fully compensate for losses to the Association.

JBMI realizes that the CRC project is dynamic, and the final footprint of the bridges and their requirements during construction are unknown. It is evident that under any build alternative JBMI is impacted and this should be evident to the general public and decision-makers <u>now</u>. We suggest that immediate efforts are needed to ensure that the JBMI infrastructure and floating homes are outlined on presentation graphics and similar materials still in use.

Columbia River Crossing June 30, 2008 Page 4

Finally, JBMI is engaged in a discussion about our future and the CRC project. We are currently experiencing impacts on housing sales and individuals are very concerned about future livability and housing values under the CRC. We are pursuing steps to bring some stability to our side of the process and look forward to receiving the same from the CRC project. We appreciate your work thus far and look forward to working with you to achieve a project that benefits us all.

Sincerely,

Jantzen Beach Moorage, Inc.

Michelle Tworeger, JBMI Secretary

Margaret W. [Peg] Johnson JBMI Board Member

Plus signatures of all remaining JBMI Board members and over 120 residents, certificate holders, and homeowners on the attached signature sheets.

Cc:

City of Portland Commissioners

TriMet Board
METRO Councilors

Southwest Regional Transportation Council

C-Tran

Signature:	Printed Name:	Address:
Cal (hoting	Canl S. KATILLES	2031 No
NAGE	Laura S. Craford	2015 N
Bonnie Bair	BONNIE BAIR	2001 N
Racy Drith	Tracy Smith	2151 N
A. Castanetto	Andrea Castanette	2043 N.
Many Crates	NANCY CKATES	2003 M
I suy listes	PERRY CROTES	
Victoria Inglis	Victoria Inglis	1947 N
0		

Jantzen Au Jantzen Aue Jantzen Ave.

Signature:	Printed Name:	Address:
Jusam Castanello	Susan Castanette	2043 n. gartzen
Janu Healt	John Heald	2045 N. Jantzey Ave
Laxuel Leald	LAUREN HEALD	2045 N. Jantzen Aux

Signature:
who
William Herolice
Estlet Jordan
Sharon Relson
Suf Barrello

Printed Name:	Address:
M.R. Grove	1995 N. Santen Ale
William H Ferdure	1991 N Jantzen Ave
Estnet Jordan	2011 n. Jantzen sue.
CHAROS JORDAY	2011 W. Janzes Aver
Sharon Nelson	2023 N Jantzen Are.
Ed Nelson	2=23 N SANTALINAL
Shown Bruntley	2031 JANTZEN AVE
Pobert Costonette	2043 N. Vantzen

Signature:	Printed Name:
(O) Many	CHARLIE CONBOY
2 Shouthall	LUNDER TRACHOEN
	22 1
11011	Martin Burns
Jell Jegot	3004) (04
And Ledex	Lian A. Krey
	TAmes Con Fu
	KENT CRAFORD
alline wersham	diane washburn

Address: PDX OR 97217 2051 N JANTZEN AUE Vancous v

Signature:

Printed Name:

Address:

Claux Jul

Lorraine Redifer
ALAN R. ZEIBKR

AVBY AUDERSACK

Pollin Rate Len

Provee Wiciery

Jim Pidgeon

Tamely F Parisony

1891 N. Jantzen ave

1887 N. JANTZEN HUE

1883 N. JANTZEN AVE.

1400 N. ANTZEN AVE

1919× Jant zel AV

1815 N JANTEN SUC

1931 N'Jantzen Ave

1999 W Juntson Aug

Signature:	Printed Name:	Address:
Lary Pedien	Lori Pidgeon	1931 W JANTZEN
Bull D	Lori Pidgeon Berni Pilip	1935 N Tantzen
The state of the s	DAN FLOREA	1935 N JANTZEN
		- L

Signature:

Vers Janes

Barbara Mila

Karlaksenzulak

Charles Dav

sing John

Mully M

Printed Name:

JAN LOWERY

Dennis Lorery

BARBARA Nelson

KarlaKsenzulaK

Charley Dacis

M. J. KANTOR

Michelle Tworoger

Michelle Tworoger

Address:

1984 n. Santzen

1987 N. Tanteen

1995 n. Janka

1973 N. Jantzen

1973 N. Jantza

1717 NIJHUTZON

1545 A N. Jantzen

1545 N. Jantzen

Signature:

Printed Name:

Address:

Brent Baker Katherine Baker

2039 W. Jantzen

2039 N. JAntzen

Harep

1985 N. DANTZEN

Marian M. Modley

1985 W. JANTZER

HOO B. MOYANDER

JASC N. JANTZEN

and Anno metaland

1959 N. SANTZEN

1999 W JANTZED

1875 N. Dantzen Are.

p.1

503-283-2171

Jan Hamer

Jun 27 08 04:53p

I, as Certificate Holder, Homeowner and/or Resident of Jantzen Beach Moorage, Inc. (JBMI) floating home community, endorse, support and agree with the shared comments contained in our community letter submitted to Columbia River Crossing (CRC) as a response to the Draft Environmental Impact Study (DEIS).

Signature:

Printed Name:

Address:

Rachael East 1875 N. Jantzen

Signature: Pause Fret **Printed Name:** Qusan O'Hollaren AURIE EWERT BILL BE CANGER **Address:** 2007 N. Hantaen 1275 N JANTEN 1897 N JANTZEN 1897 H. SALTLEDI AUK 1895 N. Jantzen 1875 N. JANTZEN

Signature:

Vanu M Oreis Delsly Dowe Jan meett

Jayl I South

Printed Name:

Maney M Drvis Wegley Rowe Roger Brunc Jan Zweert

Burdon Frw. N

JACK S. Scott

Address:

1843 N Jan Teen Are 1845 N 11 11

1859 N. Jantzentre.

1829 N Jantzenau

1835 4 JANTZEN AVE

1861 N. JANTZEN

Signature: **Printed Name:** Harry Cigiq

Address: 1811 N. Jantzen Hoe 1803 N. JANTZEN AVE 1737 NJAMZEN AVE 1735 N. Janteen Ave 1717 N Santzen Ave 19 N Janteen Ave 1731 N. JANTZEN AVE,

Signature:	Printed Name:	Address:
Johnne Suth Onail	JOHNNIE RUTH O'NEAL	1767 N. JANTZEN
By Proxy for Jeo	LYLE ARENDS	1773 N. JANTZEN
	Charles Gross	1775 N 34VTZON
Ba. Mi Shu	MARY AND MEGGEE	1755 N. JANIZED
Kutt Noonen	Ruth Mooning	1763 M. JAntzer
Musuel E. Ving	Michael Vingin	1753 N. JANTZEN AVE.
	Cathie Virgin	1753 N. JANTZEN AVE.
El Jauren	GREG VANSON	1781 N. JANTZEN AVE

p.1

503-283-2171

Eny Sym Frost
Santry Serly Serry Master

Jerry Mallister

Jerry Manaster

Signature:

Printed Name:

Draft Environmental Impact Study (DEIS).

GREG POLICIAS

PAUL HAGEN

I, as Certificate Holder, Homeowner and/or Resident of Jantzen Beach Moorage, Inc. (JBMI) floating home community, endorse, support and agree with the shared comments contained

in our community letter submitted to Columbia River Crossing (CRC) as a response to the

Terance Consgrove

TERRY LYM FROST

Sandra L. Seyler

GERALD (JERRY) L. M. AllisTER

CAROL MCMASTER

Address:

1709 NJAMBENAUS

1695 N. JANTIA AUR

1703 N JANTEN AVE.

1734 NJ Anten Ave

1721 N. Jantzen Ave

1711 N. JANTZEN AVE

1715 N JANTZEN AVE

Signature:	Printed Name:	Address:
Jest D	Jean England	1783 N Santzen
(an Han	Moonga My. Jan R, Hann	1881 No. Touten
The sange	KOBERT JONES	1535 N. JANTIEN A.C

Signature:

Rym master

Jerry Lebrul

Joannes mechlen

Patrica a Fully

Printed Name:

PATRICIA GULLEY
ROY MCMANOR

WR Kyte

JERRY PEKRUL

Joanne S. Mecklem

DARRELL T, MECKLEM

Patricia A. Fulcher

RONALD D. FULCHER

Address:

1743 N JANTZEN AVE

1715 N. Jandym

1707 N Jantzen

1533 NJANTZEN AUG

1619 N. Jantzen Av

1619 N. JANZEN AVFL

1741 N Jantzen Ave

1741 N. JANTZEN AUE

Signature:	Printed Name:	Address:
Soule Dosch	Lorelei Dosek	1671 N Jantzen Auc. Portland 9721
Judal Sc	Judy Cony	1653 N. Jangen Ove 97217
	Jack Con	1653 N Jantyn are 97217
2	JAN BALDWIND	1665 N. Jant 32 97217
June ofmans	BRUCK BROUSSAND	1863 N. JANTER~ Bun 92217

Signature:	Printed Name:	Address:
Gerre Vano co	SherreVanegas	1613 N gantzen Ave Port 97217
Tharion WSells	MARION SCHULZ	1865 N JANTREN 9721
Lignaffel	Tammy L. Ell	1771 N. Jantzen 97217
Sillenger	Ed Vanegas	1613 N Juntzen 97217
ang Og Ayon	Angela L. Lyons	(659 N Jantzen 9721
DAVID Humas	David Kume	1663 N. Juntzen 922
South	Dawn Dalgliesh	1643 n. Jantier tre
Mahrynifan R Doal	maksymiljan R. Dosek	1671 N. Juntyen and Patlant 10. 97217
		Vallan 2019

Signature:

Str Toulf

Josep Panel

Sam Purpusa

Jaruska Stasko Sitoy Serry Riddell

Jhipman Jhipman

Printed Name:

STORE PAUL

KATHY PAULL

TERRY PIDDELL

TAMARA PURPURER

JARUSHA STASKO

BETSY BERRY RIDDELL

EDWARD STASKO

Linos Myers

J. Shephan

Address:

1679 A JANTIZON AVE

1679 N. Janzen AVE

1691 N Jantzen Ave

1681 N Nantzen Ave

1693 N. Jantzen Ave

1691 N. Jantzen Ave.

1693 N. Jantzen Ave

1673 N. JOHTZEN PUE

1667 N Jant Zen Ceve

Signature:
Allor
Sure Bachmen
1 Stlub
Rebecca L. Bergoren
Pat Dunegan
Sheindan
Plus
M Dowell

Printed Name:
J. McCAULEY
Susie Bachman
Robert Steele
Rebecca L. Berggren
Pat Dunesan
Shori Lowry
Sheri Lowry Richard Bigelow
Carol A. M. Dowell

Address: 1555 N. JANTZEN AUC 1555 N. Jantzen AUE 1553 N. Joutzen Ove 1547 N. Jantzen Ave 1531 N. JANTZEN AVE 1331 N. Jantzen AVI 1553 N. Janizon ave 1527 N. Jantzen Ave.

Signature:	Printed Name:	Address:
	SHERRY MAG	1525 N. JAUTZEN AUE
Train Brinel	Traci Burnett	1525 N. Jantzen Are
8800	Sara Scott	1589 N. Jantson Ave
MAKE	MÍA PALKIE	1549 N. Jrutzen Ave