



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.

- 1) 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.

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- 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.

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- 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 now. 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.

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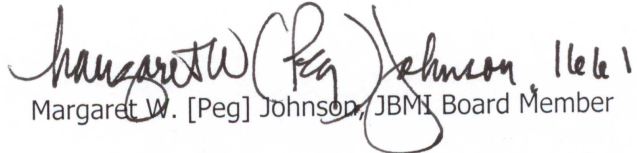
Page 4

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

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:

Carl S. KATINS

VS LFL

Bonnie Bair

Tracy Smith

A. Castanetta

Nancy Crates

Perry Crates

Victoria Inglis

Printed Name:

Carl S. KATINS

Laura S. Crawford

BONNIE BAIR

Tracy Smith

Andrea Castanetta

NANCY CRATES

PERRY CRATES

Victoria Inglis

Address:

2031 N. Jantzen Av

2015 N. Jantzen Ave

2007 N JANTZEN AVE

2151 N Jantzen ave

2043 N. Jantzen Ave.

2003 N Jantzen Ave

✓ ✓ ✓

1947 N Jantzen Ave

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:

Susan Castanette

Susan Castanette

2043 N. Jantzen

John Heald

John Heald

2045 N. Jantzen Ave

Lauren Heald

LAUREN HEALD

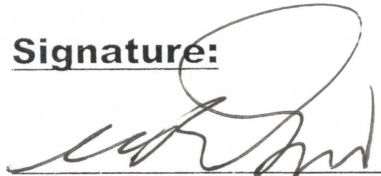

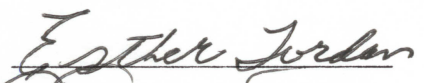
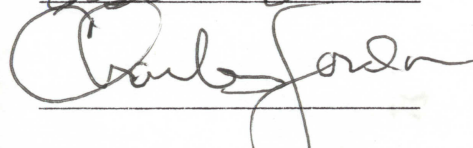
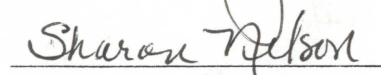



2045 N. Jantzen Ave.

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:

M.R. Grove
William H Ferdue
ESTHER Jordan
CHARLES Jordan
Sharon Nelson
Ed Nelson
Shawn Brantley
Robert Castanette

1995 N. Jantzen Ave
1991 N Jantzen Ave
2011 n. Jantzen ave.
2011 W. Jantzen Ave
2023 N Jantzen Ave.
2023 N Jantzen Ave
2031 Jantzen Ave
2043 N. Jantzen

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:

~~Handwritten signature~~

~~CHARLIE CONBOY~~

~~PDX OR 97217
2051 N JANTZEN AVE~~

~~Handwritten signature~~

~~LYNDETTE TRAYHORN~~

~~1129 SW HENSLEY Rd. Tualuma
OR 97140~~

~~Handwritten signature~~

~~Martin Burris~~

~~565 N 91st Ct Vancouver WA
98662~~

~~Handwritten signature~~

~~Scott Stark~~

~~6918 SE Evergreen Way
Vancouver WA
98664~~

~~Handwritten signature~~

~~Lisa A. Kelly~~

~~11351 NW East Rd. HWY 06
97229~~

~~Handwritten signature~~

~~JAMES CONLEY~~

~~2047 N Jantzen 97217~~

~~Handwritten signature~~

~~KENT CRAFTED~~

~~2015 N. JANTZEN 97217~~

~~Handwritten signature~~

~~DIANE WASHBURN~~

~~1967 N Jantzen~~

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:

Lorraine Redifer

Lorraine Redifer

1891 N. Jantzen Ave

Alan R. Zeiber

ALAN R. ZEIBER

1887 N. JANTZEN AVE

~~Andy Anderson~~

ANDY ANDERSON

1883 N. JANTZEN AVE

~~John Graham~~

PAUL GRAMAM

1400 N. JANTZEN AVE

Rollin Ratchon

Rollin Ratchon

1919 N Jantzen Ave

Bruce Wacey

Bruce Wacey

1815 N JANTZEN AVE

Jim Pidgeon

Jim Pidgeon

1931 N Jantzen Ave

James F. Parisseau

James F. Parisseau

1999 W Jantzen Ave

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Signature:

Printed Name:

Address:

Lori Pidgeon
Berni Pilip
Dan Florea

Lori Pidgeon
Berni Pilip
DAN FLOREA

1931 W Jantzen
1935 N Jantzen
1935 N JANTZEN

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:

Jane Lowery
Dennis Lowery

JAN LOWERY

1984 n. Jantzen

Barbara Nelson

Dennis Lowery

1987 N. Jantzen

Karlaksenzulak

Barbara Nelson

1995 n. Jantzen

Charley Davis

Karlaksenzulak

1973 N. Jantzen

M. J. Kantor

Charley Davis

1973 n. Jantzen

Michelle Tworoger

M. J. KANTOR

1717 N. JANTZEN

Michelle Tworoger

Michelle Tworoger

1545 A N. Jantzen

Michelle Tworoger

Michelle Tworoger

1545 N. Jantzen

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Signature:

Printed Name:

Address:

Brent Baker

Brent Baker

2039 N. Jantzen

Katherine Baker

Katherine Baker

2039 N. Jantzen

Jeff Harce

Jeff Harce

1985 N. Jantzen

Marion M. Mueller

Marion M. Mueller

1985 N. Jantzen

Arthur B. Alexander

Arthur B. Alexander

2035 N. Jantzen

Carol Anne McFarland

Carol Anne McFarland

1959 N. Jantzen

Rick Labisera

Rick Labisera

1999 N. Jantzen

Matt Greer

Matt Greer

1875 N. Jantzen Ave.

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Signature:

Printed Name:

Address:

~~Raymond~~

~~Raymond~~

~~1715 N. Jantzen~~

Rachael

Rachael Geer

1875 N. Jantzen

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:


SUSAN O'HOLLAREN

2055 N. JANTZEN AVE

Scott Sabih

2007 N. Jantzen

SHER SHEPPS

1975 N. JANTZEN

Bob Shepps

1875 N. JANTZEN

LAURIE EWERT

1897 N JANTZEN

Tim Ewert

1897 N. JANTZEN AVE

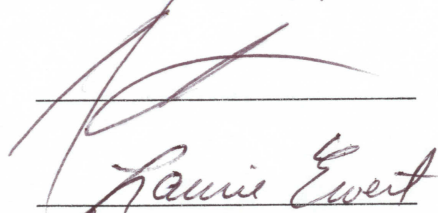
Sharon Rixen

1895 N. Jantzen

BILL BELANGER

1895 N. JANTZEN

She Shepps




Sharon Rixen

Bill Belanger

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Signature:Printed Name:Address:

Nancy M Orvis

Nancy M Orvis

1843 N Jantzen Ave

Wesley Rowe

WESLEY ROWE

1845 N " "

Roger Brunw

Roger Brunw

1857 N " "

Jan Zweerts

Jan Zweerts

1859 N. Jantzen Ave.

Burdue Trwin

Burdue Trwin

1829 N Jantzen Ave

Sam Adlee

Sam Adlee

1835 N JANTZEN AVE

Jack S. Scott

JACK S. SCOTT

1861 N. JANTZEN

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:

Michael Byrne

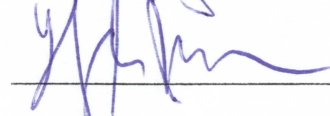
BRIAN MILLER

MARLENE MALONEY

LEONARD MGRERS

Harry Craig

Judy Kantor



M. L. Frost

Address:

1811 N. Jantzen Ave

1809 N JANTZEN AVE

1803 N. JANTZEN AVE

1737 N JANTZEN AVE

1735 N. Jantzen Ave

1717 N Jantzen Ave

1719 N Jantzen Ave.

1731 N. Jantzen Ave.

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Signature:

Printed Name:

Address:

Johnnie Ruth O'Neal
By Proxy for JO

JOHNNIE RUTH O'NEAL

1767 N. JANTZEN

LYLE ARENAS

1773 N. JANTZEN

Charles Gross

1775 N. JANTZEN

Mary Ann McGree
Ruth Noonan

MARY ANN MCGREE

1755 N. JANTZEN

Ruth Noonan

1763 N. JANTZEN

Michael E. Virgin

Michael Virgin

1753 N. JANTZEN AVE.

Charlie Virgin

Charlie Virgin

1753 N. JANTZEN AVE.

GREG VANSON

GREG VANSON

1781 N. JANTZEN AVE

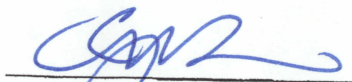
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Signature:

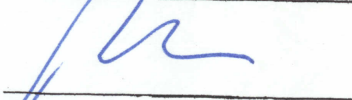
Printed Name:

Address:



GREG DOUGLAS

1709 N JANTZEN AVE



PAUL HAGEN

1695 N. JANTZEN AVE



Terance Causgrove

1703 N JANTZEN AVE.

Terry Lynn Frost

TERRY Lynn Frost

1731 N JANTZEN AVE

Sandra Seyler

Sandra L. Seyler

1721 N. Jantzen Ave

Jerry McAllister

GERALD (JERRY) L. McALLISTER

1711 N. JANTZEN AVE

Carol McMaster

CAROL McMASTER

1715 N JANTZEN AVE

503-283-2171

Jan Hamer

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Signature:

Patricia Gulley

Ray McMaster

WR Kytö

Jerry Peck

Joanne S. Mecklem

Darrell T. Mecklem

Patricia A. Fulcher

Ronald D. Fulcher

Printed Name:

PATRICIA GULLEY

Ray McMaster

WR Kytö

JERRY PECK

Joanne S. Mecklem

DARRELL T. MECKLEM

Patricia A. Fulcher

RONALD D. FULCHER

Address:

1743 N JANTZEN AVE

1715 N. Jantzen

#1707 N Jantzen

1533 N JANTZEN AVE

1619 N. Jantzen Av

1619 N. JANTZEN AVE

1741 N Jantzen Ave

1741 N. JANTZEN AVE

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Signature:

Printed Name:

Address:

Lorelei Dosek

Lorelei Dosek

1671 N Jantzen Ave. Portland 97217

Judy Cony

Judy Cony

1653 N. Jantzen Ave 97217

Jack Cony

Jack Cony

1653 N Jantzen ave 97217

JAN BALDWIN

JAN BALDWIN

1665 N. Jantzen 97217

BRUCE BROUSSARD

BRUCE BROUSSARD

1863 N. JANTZEN BLVD 97217

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:

Sherre Vanegas

Sherre Vanegas

1613 N Jantzen Ave Port 97217

Marion W Schultz

MARION SCHULTZ

1865 N JANTZEN 97217

Tammy L. Ell

Tammy L. Ell

1771 N. Jantzen 97217

Ed Vanegas

Ed Vanegas

1613 N Jantzen 97217

Angela L. Lyons

Angela L. Lyons

1659 N Jantzen 97217

David Nunn

David Nunn

1063 N. JANTZEN 97217

Dawn Dalgliesh

Dawn Dalgliesh

1643 N. Jantzen Ave

Maksymilian R Dosek

Maksymilian R. Dosek

PHD. OH 97217
1671 N. Jantzen ave
Portland, Or
97217

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Signature:Printed Name:Address:

Steve Paull

STEVE PAULL

1679 N JANTZEN AVE

Kathy Paull

KATHY PAULL

1679 N. Jantzen Ave

Terry Riddell

TERRY RIDDELL

1691 N Jantzen Ave

Tamara Purpura

TAMARA PURPURA

1681 N Jantzen Ave

Jarusha Stasko

JARUSHA STASKO

1693 N. Jantzen Ave

Betsy Berry Riddell

BETSY BERRY RIDDELL

1691 N. Jantzen Ave.

Edward Stasko

EDWARD STASKO

1693 N. Jantzen Ave

Linda Myers

Linda Myers

1673 N. JANTZEN AVE

J. Shepman

J. Shepman

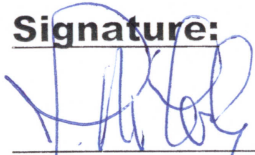
1667 N Jantzen Ave

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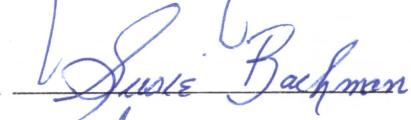
Printed Name:

Address:



J. McCaulley

1555 N. JANTZEN AVE



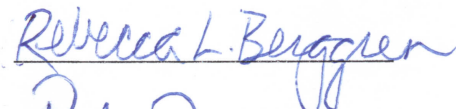
Susie Bachman

1555 N. Jantzen Ave



Robert Steele

1553 N. Jantzen Ave



Rebecca L. Berggren

1547 N. Jantzen Ave



PAT DUNEGAN

1531 N. JANTZEN Ave




Sheri Lowry

1531 N. Jantzen Ave



Richard Bigelow

1553 N. Jantzen Ave



Carol A. McDowell

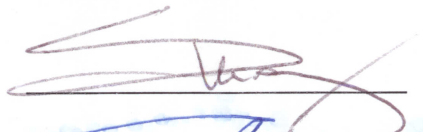
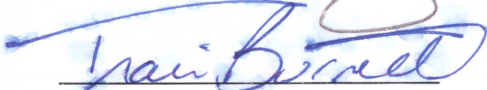
1527 N. Jantzen Ave.

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:


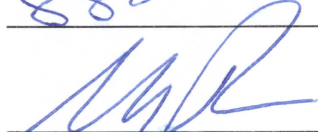
Printed Name:

Address:



Traci Burnett

Sherry May
Traci Burnett

1525 N. Jantzen Ave

Sara Scott

1525 N. Jantzen Ave

1549 N. Jantzen Ave

MIA PALKIE

1549 N. Jantzen Ave

