


N-018-001

Please see response to comments N-021-001 through N-021-019.

From: [Ronald Schmidt](#) 
To: [Draft EIS Feedback;](#)
CC: [JBMI; Peg Johnson; Lila Leathers;](#)
Subject: CRC
Date: Tuesday, July 01, 2008 5:56:35 PM
Attachments: [JBMI CRC DEIS Comment Letter FINAL\[1\].pdf](#)

N-018-001 Please see the attached statement of my home neighborhood which I ask be put into testimony as I support it. Thank you.

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June 30, 2008

Columbia River Crossing (CRC)
Attn: Heather Gundersen
700 Washington Street, Suite 300
Vancouver, WA 98660

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.

- 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 be 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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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 Tworoger, 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