

# Bridgeton

NEIGHBORHOOD ASSOCIATION

October 24, 2011

Federal Highway Department

Federal Transit Agency

Dear Sirs,

**N-001-001** The Bridgeton Neighborhood continues to express support for building a new I-5 bridge as quickly as possible. However, we know that our quality of life will be impacted by the construction of the new I-5 bridge. We hope it will improve with the bridge completion. We are reminding you of promises made to the residents of North Portland.

**Prior commitments that need to be upheld**

The FEIS shows that the Arterial Bridge from Marine Drive to Hayden Island and the East Side Multi-use Path are now options. Our position is that these items promote the safety and well being of the people in the Bridgeton neighborhood as well as those on Hayden Island and East Columbia. Consider that Fire Station #17 is the first responder for emergencies on Hayden Island as well as East Columbia and Bridgeton neighborhoods. Providing a non-freeway access option provides security and safety to the area as well as promoting alternative modes of transportation since walking and biking are popular in North Portland.

**N-001-002** If the Arterial Bridge and East Side MOP are not built, access from Marine Drive will use the collector-distributor lanes mixing freeway bound traffic with local access traffic. We have been told that the Arterial Bridge is going to be used if the North Portland Harbor Bridges collapse during an earthquake. Are there any plans to retrofit the North Portland Harbor Bridges if the Arterial Bridge is eliminated?

**N-001-003** The CRC has attended many Bridgeton meetings and has always said they want to work with the public to support their needs. We see nothing in this plan that shows a sincere desire to support the need for a bike and pedestrian path along the top of the levee. We would like to see the project support the completion of bike and walk paths including those on the Bridgeton Trail to encourage people to use alternative methods of transportation.

**N-001-004** We also see broken promises to the Hayden Island community that affect residents in all of North Portland. We support the Hayden Island Plan which strives to make a viable connected community. Neighborhoods and retail have a symbiotic relationship and location is a key component. The FEIS report shows that most of the businesses in the core of the Island are being removed. Many will be replaced with several wetland marshes because of the CRC Storm Management Plan. Is it possible to move these ponds elsewhere and leave this prime retail property for business development?

**Incorrect data used for impact statements and assumptions**

**N-001-005** The FEIS states that there is a total population for Bridgeton of 39 people. The 2000 census showed a population of 573 and we have added many high density residences since then pushing our population to over 1200 many of whom are over 65. It is true that we have few people with disabilities because the lack of sidewalks

## **N-001-001**

The benefits you have described for Option A are accurate. Option A was the preferred option in the FEIS and is part of the Selected Alternative in the ROD.

## **N-001-002**

Option A is part of the Selected Alternative in the ROD.

There are currently no plans to provide a major seismic retrofit of the existing North Portland Harbor bridge.

## **N-001-003**

The project will complete the pathway connecting the Bridgeton neighborhood to the Marine Drive Trail, west of the project. Please see Section 2.2.3 of the FEIS.

## **N-001-004**

The stormwater facilities shown in the FEIS will continue to be refined as design work progresses. Under the terms of the biological opinion (BO), the CRC project must treat stormwater runoff using bioretention, bioslopes, infiltration ponds, porous pavement, constructed wetlands, and vegetated and soil amended swales designed for infiltration. Based on the information we have on file, stormwater runoff is currently not treated before being released to North Portland Harbor or the Columbia River.

The Hayden Island Redevelopment Plan states that runoff from local streets will be treated in roadside planters and that CRC stormwater will be managed in a "green, state-of-the-art manner." Although the Hayden Island Plan map did not show the constructed wetlands, these are a "green" concept for stormwater treatment, and have been shown in project designs as early as May 2009. The stormwater treatment

**N-001-005** | and public transportation make it hard for anyone with a disability to live in our area.

**N-001-006** | The FEIS lists many buses that serve the Bridgeton Neighborhood. Bridgeton is serviced by one bus which runs only during rush hours. We currently have to walk across a muddy path on private property on the levee or walk on the side of Marine Drive to access the buses and Max as listed in the FEIS. We feel that walking and biking on the side of Marine Drive is dangerous, because cars are frequently parked on the side of the road forcing people to walk on the very busy Marine Drive itself.

These inaccuracies tend to imply that there will be minimal impact to our population. Our population has grown using a very high density housing model. We need to protect our continued access to places of work and stores. Any loss of direct access between the neighborhoods is unacceptable.

**Issues that impact Peninsula Drainage District 2**

**N-001-007** | Bridgeton and East Columbia are joined together forming Peninsula Drainage District 2. Bridgeton has already lost many trees to meet the "No trees on Levees" standards of the Army Corp of Engineers. We know firsthand how costly it can be to fight their standards. We have heard that the CRC plans include placing concrete bridge supports into the levee. Having years of experience on levee issues with the Army Corp of Engineers leaves us understanding that this will lead to a difficult, expensive, and time-delaying fight. Our fear is that this sort of issue will cause the construction of the Arterial Bridge to be eliminated or delayed.

**N-001-008** | We need to save as many of the old growth trees in the area as possible. Removing old growth trees will add to the run off that has to be managed by the drainage districts in addition to adding an industrial blight appearance of the area. Removing trees harms the habitat for everyone.

We encourage you to use your resources

**N-001-009** | Bridgeton residents are aware of access issues for our neighborhood and ask to be involved in design plans relating to this access to the freeway and to the island. We know that the CRC construction will increase the distance and drive time to the island from Marine Drive. We are currently limited to three streets that enter onto Marine Drive for travel into and out of Bridgeton. The intersections at Anchor Way and Gantenbein are frequently blocked by traffic waiting to circle over, then under and enter I-5 north bound. Encouraging walking and biking to the island is a worthy goal. We would be able to respond to issues that impact us if we were allowed to work within the process instead of being told what is best for us.

**N-001-010** |

**N-001-011** | Bridgeton residents are in favor of building a new bridge for I-5 to cross the Columbia. We would like to see an aesthetically pleasing structure which will be viewed as something to visit and admire. For the safety and welfare of all of North Portland, we need the direct access to and from Hayden Island by car, by bicycle and on foot.

Sincerely,

Leslie Sawyer,  
Co-Chair Bridgeton Neighborhood Association

proposed in the FEIS does include the "green streets" approach proposed in the Hayden Island Redevelopment Plan to the extent feasible. This approach to stormwater treatment is not suitable for streets located under bridges (where it will be difficult to establish plants) or where streets are at or below the seasonal high groundwater table. In addition, care was taken to ensure that the facilities are located on land that is either currently owned by ODOT or would need to be acquired for CRC construction, independent of stormwater management. The current proposed water quality facilities meet these conditions.

While wetlands are typically permanent bodies of water, they are not stagnant. Water flows through them during frequent rainfall events, producing conditions that are not conducive to mosquito larval development. As stated above, a constructed wetland is one of the BMPs listed by NMFS in its BO as providing the level of treatment necessary to protect endangered species found in the Columbia River. As such, the discharges are considered by the agency to meet its stringent requirements.

We will continue to review the developing design to determine whether additional streets lend themselves to this method of runoff treatment. Regardless, the project still needs to manage runoff from almost 28 acres of impervious area consisting of I-5 pavement across Hayden island, associated ramps, the elevated transit guideway, and structures.

**N-001-005**

The project will be able to improve the conditions for residents in the Bridgeton Neighborhood. The Bridgeton trail will be connected, with accessible facilities, to the Marine Drive Trail and the river-crossing network.

**N-001-006**

The project will improve the sidewalks and roadways, such as Marine

Matt Whitney,  
Co-Chair Bridgeton Neighborhood Association  
(Out of town and not available to sign the report)

Supported by the following board members:

Pat Bartch  
Richard Brown  
Scott Niessen  
Anne Neuenschwander  
Debbie Robertson  
Elizabeth Sanders  
Brian Stipak  
Walter Valenta  
Chuck Wilson

Way, that connect your neighborhood with the MAX station, bus stops, and the rest of the transportation network.

**N-001-007**

We have been coordinating with the U.S. Army Corps of Engineers and the Peninsula Drainage District on the impacts to the levee. We are expecting to receive a permit but do not yet know what conditions may be associated with it. The project's intent is to build the local multimodal bridge.

**N-001-008**

The project will attempt to avoid tree removal as much as possible. This is an appropriate issue for on-going coordination with the community.

**N-001-009**

The LPA has a fairly recently updated design for North Portland. The Marine Drive, Vancouver Way, Martin Luther King Jr Boulevard, and Union Court configuration provides improvements in safety, access, and intersection operations.

**N-001-010**

There are numerous opportunities to become or stay involved in the planning and design of the CRC project. Please contact the CRC office directly for more information.

Multiple methods have been used to engage the public so as to address the needs of a wide variety of people in the project decision-making process. Public feedback has helped guide the outreach effort. Examples include workshops with facilitated small-group discussions, open houses where participants can talk one-on-one with staff, public hearings, presentations and discussions at community and neighborhood-sponsored meetings (often at the group's request), and

advisory group meetings where CRC seeks recommendations from a citizen committee. These events and meetings have taken place at a variety of locations, days of the week, and times of the day to meet the needs of the entire community. For more information on the project's public outreach, please see Appendix B of the FEIS.

**N-001-011**

Thank you for your comments.

October 24, 2011

Federal Highway Department

Federal Transit Agency

Dear Sirs,

**N-002-001**

I am the Co-Chair of the Bridgeton Neighborhood and the neighborhood continues to express support for building a new I-5 bridge as quickly as possible. This weekend we held a neighborhood function where over 50 people expressed opinions about the bridge after looking at the chart of the newest plans for Option A.

For years, most of the neighbors have been apathetic about the plans to build a new bridge. They do not think it will happen in their lifetime and they have been disappointed by the proposed added drives to access the freeway by driving south on Vancouver into the heart of all of the truck traffic and then northwest on MLK and Marine Drive. People are actually enthusiastic about the plan to have access to Hayden Island on an Arterial Bridge from Marine Drive. They love the idea of being able to drive, bike or walk to Hayden Island without having to get into freeway and heavy truck traffic. They are optimistic that Hayden Island business will return. They also like the idea of a new more direct way to go to the Kenton area where half of us have our post office.

They also expressed a desire to finally have a bike and pedestrian path from the west end of Bridgeton Road to I-5 and the proposed East Side MOP or the Arterial Bridge. Yes, we would really like to see the completion of the proposed Bridgeton Trail.

Everyone did not like the idea that we would have to drive several extra miles in heavy truck traffic to be able to use the collector-distributor lanes packed with freeway bound traffic in order to drive to Hayden Island if the Arterial Bridge plan is dropped.

I know that we will be impacted for years during this construction, but I am excited about the potential for improved access when the bridge and ramps are completed. I look forward to free flowing traffic on Marine Drive when there are no longer total stops of traffic caused by the opening on the bridge and frequent accidents. It will be great to be able to drive on a free flowing Marine Drive during rush hour instead of getting caught in traffic waiting to cross over I-5, under it and then merge onto it just prior to the Hayden Island merge. This back log of traffic frequently closes access to two of our three roads that connect to Marine Drive.

**N-002-002**

I hope that officials from the CRC, the state, and the city will continue to work with us to make an aesthetically pleasing bridge that gives us better access to Hayden Island, Portland, and Vancouver.

I am happy to express my support for the construction of a new I-5 bridge and hope that the promise of an Arterial Bridge and the East Side MOP will be retained in the project plan that goes forward to completion.

Sincerely,

Leslie Sawyer,  
Co-Chair Bridgeton Neighborhood Association

**N-002-001**

Aesthetics will be an important consideration during final design and citizen input will be sought.

The Selected Alternative described in the ROD includes the local multi-modal bridge and the multi-use path mentioned in this comment. The project will connect the pedestrian network through the Marine Drive interchange with the western terminus of the Bridgeton Trail.

**N-002-002**

Please see response to comment N-002-001 above.



October 24, 2011

Ms. Heather Wills  
CRC Environmental Manager  
700 Washington Street, Suite 300  
Vancouver, WA 98660

ECC: Gerald Solomon FHWA HEPE [Gerald.solomon@dot.gov](mailto:Gerald.solomon@dot.gov)  
Carl Bausch FTA [carl.bausch111@dot.gov](mailto:carl.bausch111@dot.gov)

Dear Ms. Wills,

**N-003-001** Hayden Island Neighborhood Association (HINooN) is the City of Portland Oregon recognized neighborhood association representing the 2,200 residents and businesses on Hayden Island. Many of our Board Members have served on multiple committees throughout the development of the CRC project.

HINooN and it's constituents are at "ground zero" of the CRC project with I 5 being the only way to access or to leave our island. The project will divide our community in half. Nonetheless, HINooN is committed to supporting the Columbia River Crossings including the plan designs agreed upon after diligent work by all. We ask for a recommitment from CRC to:

- Follow through with the agreed upon plan designs including the Arterial Bridge,
- The Hayden Island Plan,
- Mitigation
- The Metro Conditions of Approval – Mitigation & Community Enhancement
- Relocate or build a new floating home marina for 31 homes displaced

#### AGREED UPON PLAN DESIGNS

**N-003-002** Considerable time and energy has been expended by all to create plans designs which are workable, admirable and acceptable by all parties. The designs which are missing or greatly reduced include the Light Rail Station (restore agreed designs, add parking facilities for island residents, east west transit bus during construction and after); Stormwater treatment is currently shown in CRC plans for areas designated for Neighborhood Commercial use in the Hayden Island Plan (change to in situ treatment on bridges or pump to Marine Drive treatment area); Parks to be developed on the north and south island sides of the construction area (to be ceded to city, county or state), and the protection of the existing businesses as the start of the Hayden Island Plan retail center.

#### THE HAYDEN ISLAND PLAN (the "HIP")

**N-003-003** The plan was developed with over 20 years of studies and approved by the Portland City Council timed to be available for the CRC planning. It included:

A more walkable residential community that protects the quality of the existing residential neighborhoods of both land-based and floating homes.

#### **N-003-001**

Thank you for years of collaboration on this project. Your specific issues are addressed with the following specific responses.

#### **N-003-002**

Consistency with each of these plans and prior design decisions is discussed below.

#### **N-003-003**

The stormwater facilities shown in the FEIS will continue to be refined as design work progresses. Under the terms of the biological opinion (BO), the CRC project must treat stormwater runoff using bioretention, bioslopes, infiltration ponds, porous pavement, constructed wetlands, and vegetated and soil amended swales designed for infiltration. Based on the information we have on file, stormwater runoff is currently not treated before being released to North Portland Harbor or the Columbia River.

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**N-003-003**

A new neighborhood-serving business area east of Interstate 5.  
New transit-oriented development adjacent to the proposed light rail station west of the interstate.  
Continued support for marine businesses, and enhanced marine and terrestrial habitats so important to the Columbia River environment.  
<http://www.portlandonline.com/bps/index.cfm?a=280799&c=34248>

Instead, we are faced with the destruction of the existing retail core, the taking of the land for the future center for inaccessible and potentially toxic water treatment and massive visual and physical barriers to going from one side of the community to the other.

We ask that The Hayden Island Plan be used in recommitting earlier plan designs and in future decision making, that the water treatment facilities be moved off island (it wasn't generated here) and the land for the retail core be re committed.

#### MITIGATION

**N-003-004**

Given our island is surrounded by water with only one access point (Interstate 5) soon to be surrounded by construction equipment, construction activity and sensory overload, living conditions will suffer greatly. Having our transportation options reduced at a time when our sources for life needs (food, gasoline, prescriptions, etc.) are being removed further decimates our lives. We need a more sincere response and better, concrete solutions than merely pointing out the number of possible grocers in a two mile radius. A large number of Island Residents do not have personal transportation, are handicapped or otherwise mobility challenged. The suggestion that they will have to travel 2 miles to find a suitable grocery store when it is known major river channels, wetland areas and bridges under construction fill that 2 mile stretch and no public transportation exists between here and there does not offer a viable solution. A real solution to the destruction of a real grocer is not an enhanced Target store.

Building the arterial bridge and building it first is paramount; putting the Hayden Island portion of construction on a fast track, low impact (air, noise, vibration, environmental) schedule; providing an economic development fund adequate to entice the retailers and services of basic life services without leaving the island; providing regular and reliable transportation services for all residents to those retailers and services off island until on island is available; compensation for those who sell their homes during construction for a lesser value all should be considered minimum standards of mitigation. Lists of mitigation requests by residents and businesses of the island are attached for review.

#### METRO CONDITIONS OF APPROVAL – MITIGATION - COMMUNITY ENHANCEMENT

**N-003-005**

The Metro Councilors made it very clear in their discussions prior to the Land Use Final Order that both Mitigation and a significant Community Enhancement Fund will be part of the project. We expect to see quantitative descriptions of the mitigations and enhancements including budget amounts.

#### RELOCATE OR BUILD A NEW FLOATING HOME MARINA FOR 31 HOMES DISPLACED

**N-003-006**

Jantzen Beach Moorage is a unique river community of 177 homes which float on the Columbia River. It will lose three rows of homes permanently and one row temporarily during construction. While the marina itself will need reparation for increased costs which are incurred by having fewer homes to share expenses with, the major impact is to those losing the slips their homes are kept in.

3209 N. Schiefel Street, Portland, Oregon 97217 <http://www.myl HaydenIsland.com/>

acres of impervious area consisting of I-5 pavement across Hayden island, associated ramps, the elevated transit guideway, and structures.

#### **N-003-004**

The project will continue to work with Island residents and organizations on the development of construction-period mitigation plans. The project has already committed to maintaining through-traffic capacity on the Interstate and developing a shuttle-type transit service during construction to assist those who are mobility challenged. And, as explained in the FEIS, there will be robust programs to protect businesses during construction, maintain access and visibility for these businesses, encourage contractors to spend money at these local businesses, etc. The negotiations on specific relocations (both for homes and businesses like the Safeway Store) are somewhat private matters, specific to each property owner. These discussions have recently accelerated and will continue through 2012. As the design is refined, the project will work with many businesses on the island that have been documented as displacements. Some of these businesses may only need changes to their parking lots or small parts of their buildings. Only after the Record of Decision and the further refinement of the designs can these individual negotiations begin in earnest. Part of these negotiations will address property values and the unique circumstance that the real estate market collapse has created. DOT right-of-way professionals are working on mechanisms that will appropriately compensate the displaced homeowners who owe more than their property is worth.

#### **N-003-005**

In the last three years the CRC project team, the Project Sponsors Council, and CRC advisory groups have focused on incorporating a wide range of community enhancements into the project. The project has looked for ways to leverage the highway and transit investments into additional improvements for project neighborhoods. These

**N-003-006**

The CRC Marina Study produced by Lou Schwab, Oregon Right of Way Coordinator, March 24, 2011 was produced with the premise that a new floating home marina would be speculative, that tenants for the spaces would have to be attracted, that there be an adequate rate of return for an investor to be attracted to doing the project and that low level individuals would have to navigate the myriad planning and zoning rules and regulations at various governmental levels. None of this is true. The CRC is displacing 31 floating homes, the owners having purchased these floating homes as a lifestyle choice and do not want to be forced to abandon their homes due to no where to go. We ask that the CRC sincerely work together with the residents to save these homes and lifestyles. Part of this issue will be the many incentives that have existed for floating home owners to locate on Hayden Island, and the importance of those displaced homeowners being able to remain in the Island environment. This will be a very small part of a gargantuan project and we are confident the CRC, just as the Port of Portland did for Lemon Island floating homes, can secure a new moorage for them.

HINooN and Hayden Island residents and businesses stands committed to supporting the Columbia River Crossings. We simply ask that promises made are kept, the original Hayden Island Plan be honored, mitigation be maximized for a critically sensitive area and population, community enhancement be a significant olive branch for reparations to the citizenry and that a simple construction project be added to provide for a small floating home marina.

Sincerely,



Ronald Schmidt, Chair

Cc: Mayor Sam Adams, City of Portland  
Chief Mayor Tim Leavitt, City of Vancouver Mayor  
City of Portland Department of Transportation

improvements are beyond the benefits identified as the project's purpose and need. These tangible improvements include new local roads and improved local flow and connections for Hayden Island residents; better bike and pedestrian access to the improved facilities; new bike and pedestrian trails; and a separate bridge for local auto access from North Portland to Hayden Island. We know there is more to be done. The CRC remains committed to aggressively maximizing and leveraging resources to bring additional benefits and improvements to our community. Two options have been identified for further exploration, both include a financial set-aside of a specific amount dedicated to a specific purpose. One approach is a project-specific community enhancement fund. There is some history with such an approach - the Delta Park 1-5 widening project (2006) and Metro's solid waste program (1991) are two examples. The other approach is a different concept, a regional fund established by the state to benefit the neighborhoods and communities in close proximity to 1-5 and the CRC project. Both approaches have been successfully implemented in the Portland region and will help inform this effort. We need to be clear about both of these approaches - neither will be easy. Both approaches have limitations and legal restrictions associated with anticipated funding sources. Both will require legislative support. Both will likely need enabling legislation and both will require funding.

**N-003-006**

Chapter 3 (Section 3.3) of the DEIS disclosed all known floating home displacements that would result from the two highway and two transit alternatives crossing the North Portland Harbor (pages 3-105 and 3-112, respectively). The DEIS also listed potential mitigation measures tailored to suit the unique situation of the floating home community (page 3-119).

For the FEIS analysis, the CRC project team worked to better understand the organization of the floating home communities in the North Portland Harbor. As presented in Chapter 3 (Section 3.5) and



## Hayden Island Needs related to the CRC Project

### Pre-construction Needs

- N-003-007** Specific agreement on mitigations, and community enhancement funds before the project is underway and recognition of the status of the Manufactured Home community as an Environmental Justice (EJ) community.
- N-003-008** Construction Information Center on the Island, a website, and a Community Hot Line (for residents to call for any emergency caused by construction and to answer questions about street closures, etc.), plans for Island access and circulation during construction including a monthly island news letter with CRC construction information.
- Assistance for businesses planning to stay on the Island and new businesses needed during construction (e.g. food carts, farmer's markets, grocery, pharmacy). We understand the new Target will have some groceries and a pharmacy but Target will not have a full service grocery. Inclusion of a full service grocery to replace Safeway is uncertain at this point but critically needed.
- Early construction of the Hayden Island local arterial bridge to ease traffic bottlenecks on/off the island during construction.
- Give local residents priority for new project jobs on the island (e.g. flaggers, info center hosts, environmental protection monitors, Hot Line operators, newsletter reporters/editors, etc).
- A plan for local bus/shuttle service during construction.
- N-003-009** Assistance for floating home owners being displaced.
- N-003-010** Assistance for individual EJ community residents who might be sensitive to construction impacts and disturbance.
- N-003-011** Enhanced security services for vacant properties and vacant land during right of way acquisition.
- N-003-012** Ongoing community engagement and participation (probably through the Portland Working Group and sub-groups) beginning now and continuing through project completion.

### Needs During Construction

#### *Crime Prevention*

- N-003-013** Add extra security services for crime prevention/mitigation during construction. That would be

Chapter 6 (Public Involvement) of the FEIS, the team coordinated with floating home owners, moorage owners, Boards, and management to gather address and ownership information for each floating home. The impacts to individual floating homes are described in Chapter 3 (Section 3.3) of the FEIS and listed in Appendix E - List of Potential Property Acquisitions.

In the course of conversations with potentially affected property owners, CRC staff received inquiries about the potential for constructing a new marina to accommodate displaced floating homes. To better understand issues related to new marina permitting and construction, project staff conducted research on the development of marinas. This research found likely challenges to developing a new floating home marina, including the challenge of receiving permits through local jurisdictions and environmental resource agencies. The project is not pursuing construction of a floating home marina.

As with any other acquisitions, the CRC will obtain independent appraisals to determine fair market value for each home that must be displaced but cannot be relocated. Qualified acquisition agents will work closely with each floating home owner to try to arrive at mutually agreeable terms for the purchase of each home. The agents will also provide relocation assistance to all displaced occupants.

#### **N-003-007**

Regarding a Community Enhancement Fund, please see response N-003-005.

Regarding the Manufactured Home Community being an EJ community:

Updated population and demographic information can be found in Chapter 3 (Section 3.5) of the FEIS. The displacement survey (which focused on the most directly impacted households) was undertaken in

**N-003-013** for both businesses & residences paying particular attention to vacated homes/businesses and preventing the homeless from living there.

**Island Livability**

Have an Observation Deck/Viewing Platform so people can safely observe the construction.

Have a local bus/shuttle service during construction.

If the island is without a grocery store for a period of time, provide on-call island shuttle services for getting disabled, senior and non-drivers to a grocery store.

**Traffic Management:**

Cars – always have two way streets going east/west across the bridge area. One way streets with flaggers are simply not adequate for the traffic on the island.

Bicycles/scooters/pedestrians – Have smooth surface paths east/west across the bridge area for bicycles and scooters (people with limited mobility) and foot traffic.

Have a specific plan for getting emergency vehicles on/off the island during construction with no delays.

**Vibration**

**N-003-014** Home inspections of before and after construction for any possible damages caused by construction vibrations especially for those that are closer to the staging areas and river.

**Public Health and Safety**

**N-003-015** The Island Community has not seen the FEIS but we expect it will contain detailed mitigation measures for protection of Island Residents, visitors and workers. Specific impacts of concern include:

Dust and other air pollutants There must be dust and air quality monitoring and control measures. Those who live closest to the staging and construction areas will be most exposed to dust and contaminants for a lengthy period. The respiratory health of seniors and other sensitive receptors must be protected. Home air conditioners, air filtration, replacements for louvered windows, and other measures may be necessary for protection from dust and fumes, especially those nearest the staging areas. The cleanest available diesel technology must be used for all construction equipment. Regular health care checkups and medical attention must be available for residents with existing respiratory problems, regardless of whether or not they have health insurance.

response to assertions that the Census data misrepresented the affected community. The U.S. Census data indicate that, as a whole, the Hayden Island neighborhood has a lower proportion of minority and low income households than the City of Portland, Multnomah County, or in the Project study area. Hayden Island ranks near the lower end of the spectrum in both minority and low income household composition when compared with all other neighborhoods in the study area. Households within the Manufactured Home Community were not surveyed, but these households also will not be displaced. The CRC recognizes that there are low income and minority households on Hayden Island and that they may be more frequently found within the Manufactured Home Community than elsewhere on the island. The project will consider the potential for disproportionate impacts to any low income or minority household regardless of the demographics of the surrounding neighborhood.

**N-003-008**

The CRC project is working to minimize temporary impacts during construction that could impede travel in the project area. These temporary effects were described in Chapter 3 (Section 3.1) of the DEIS, and are refined in Chapter 3 (Section 3.1) of the FEIS, which also includes proposed measures to mitigate these impacts.

As the project moves into its final design phase, the CRC project team will complete a construction staging plan that will address, in greater detail, temporary closures, detours, and access on the highway and local streets affected by construction. This construction staging plan will indicate to contractors the proposed sequencing of construction based on DOT standards. Contractors are often given the opportunity to modify the construction staging plan to maximize construction efficiency and economy, but are required to fulfill DOT performance standards for temporary impacts.

N-003-016

Noise Temporary sound barriers, low noise equipment, air conditioning (so residents can keep windows closed) and other noise mitigation measures must be used as necessary to protect nearby residents and businesses.

Asbestos and other contaminants - Contaminants in buildings to be demolished (like the Thunderbird Hotel) and in soil to be disturbed (especially in the historic landfill along Hayden Bay Drive) must be identified and properly handled during disposal.

Light Nighttime lighting of construction and storage area is necessary for public safety and security but nearby residents must be protected from light pollution.

**Business**

N-003-017

From the very small amount of construction around Target and on Hayden Island Drive in preparation for building the new Target, business in the mall has dropped off considerably. Access mitigation measures must be implemented to protect Island businesses during the freeway, interchange, and bridge construction. Provide extra signage on I-5, in Vancouver, and in Portland south of Hayden Island showing that businesses on Hayden Island are open for business during construction.

**Hayden Island Features Expected from Basic Funding of Project**

N-003-018

The Island Community expects completion of all project features shown on CRC maps of the latest preferred project alternative. These include:

- ▲ The Extension of Tomahawk Island Drive under the freeway,
- ▲ The local arterial bridge connection to the Marine Drive Interchange area,
- ▲ All freeway and local roads and structures for island access and circulation,
- ▲ The light rail extension with a Hayden Island station
- ▲ Safe walkways, signalized crosswalks, protected bike lanes and multi-purpose pathways
- ▲ Attractive retaining walls, sound walls, and landscaping for ODOT Right of Way and local streets per the Hayden Island Plan.

N-003-019

The Island Community expects support from the City, TriMet and others to promote new mixed-use development around the new light rail station consistent with the Hayden Island Plan.

N-003-020

HiNooN and HILP expect a park-and-ride facility on the island for seniors and handicapped residents in light of the lack of local bus service on the island and the planned termination of park-and-ride service at the Expo Center. Alternatively, an east west shuttle bus service on the island could move residents to and from the transit station.

The project has endeavored to avoid the displacement of businesses, though it is not possible to do so within the densely developed corridor. The project will continue to look for ways in which impacts can be minimized and avoided.

The displacement of Safeway is documented in the FEIS. Compensation for this impact is governed by the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970. The project will suggest that Safeway relocate on Hayden Island, but cannot require them to relocate in any specific location. The eventual relocation will be a business decision by Safeway.

The possibility of early construction of the local multimodal bridge will continue to be a consideration by the project as project sequencing is refined. It is also discussed in Chapter 2 of the FEIS, (Section 2.3.1), but not as mitigation. Although it is not appropriate to describe the early construction as mitigation, it is discussed as something we will explore as we further refine construction staging. Specifically Section 2.3.1 of the FEIS states:

Similarly, the Marine Drive interchange construction would need to be coordinated with construction of the southbound lanes coming from Vancouver. While this interchange can be constructed independently from the work described above, the completion and utilization of the ramp system between Hayden Island and Marine Drive requires the work to occur in the same period. Early construction of the local multimodal bridge between Marine Drive and Hayden Island, so that it can be used as an alternate access route during the remaining construction period, will be analyzed during final design. The interchange reconstruction also needs to occur so that Marine Drive can be elevated, allowing the light rail extension to cross under Marine Drive. The Marine Drive

**N-003-021** | The Island Community expects the east of I-5 neighborhood retail zone in the Hayden Island Concept Plan to be reconciled with the CRC proposal for storm water facilities in the same location. The planned storm water treatment wetlands will take many acres of land planned for other uses. Fenced contaminated treatment wetlands are not appropriate in an urban environment.

The Hayden Island Plan calls for a significant "Gateway Park" on the Columbia River as a post-construction re-use of the of Thunderbird Hotel site and the vacant area under the existing and new bridges. Also, the Plan calls for a public water access park on the north shore of North Portland Harbor at the I-5 crossing.

A multi-use path on the east side of I-5 from Marine Drive to the CR Bridge.

### **Additional Post Construction Hayden Island Needs**

**N-003-022** | Community Center. Staff the Center with help for seniors and vulnerable residents of the island.

**N-003-023** | An enhanced security system with coordination of City, TriMet, State, local security forces; coordination of local business hours with TriMet operating hours; landscape maintenance, lighting and other measures to control transients.

### **Floating Home Specific Needs (Jantzen Beach Moorage)**

**N-003-024** | New floating home moorage to permanently relocate displaced floating homes and to temporarily locate those moved out for the construction stage.

Parking structure to replace parking lots taken.

Relocate remainder of Jantzen Avenue further north to allow Jantzen Beach moorage to keep the private road for additional parking and other needs.

All existing and new utility lines crossing Jantzen Beach Moorage to be buried underground.

interchange is expected to take a little more than 3 years to construct, including work at the Victory Boulevard interchange.

### **N-003-009**

Please see response N-003-006.

### **N-003-010**

The project's focus will be on preventing and minimizing the impacts at the source. There is a list of proposed measures below. But the project will also work closely with the community and will want to know of individuals and households with unique circumstances who may be differently impacted than their neighbors. As construction plans are advanced, we will be sharing details with the neighborhood association and with businesses on the island.

The project has committed to the following mitigation measures as described on pages 3-283 to 3-285 of the FEIS:

- Control dust and exhaust emissions from demolition and construction activities.
- Require contractors to comply with State of Oregon standard specifications (Section 290) for dust, diesel vehicles, and burning activities.
- Follow State of Oregon's specifications for truck staging areas for diesel-powered vehicles.
- Use ultra low sulfur diesel for diesel construction vehicles and equipment, or otherwise comply with any new, more stringent regulations in place at the time of construction.
- Pursue emerging technologies for cleaner construction emissions, like the use of diesel scrubbers for compatible equipment, and continue to encourage and require those types of technologies as bidding laws allow.
- Require stationary sources, such as concrete mix and asphalt

## List of Mitigations: Hayden Island Businesses

- N-003-025**
- 1) Volunteer representatives from the residential and business communities need to co-create the Hayden Island construction project plan with the Columbia River Crossing, (CRC) Engineers, Right of Way experts, TriMet, ODOT, and other agencies involved in the bridge project before construction begins, and throughout the length of the project.
  - 2) Once construction begins, the selected representatives from the business/residential communities will oversee the construction plan, be the point of contact between CRC Engineers, other planning agencies, and the residents/businesses on Hayden Island.

Financial Assistance for businesses on the island including but not limited to funding the following:

- N-003-026**
- 3) Re-branding consultative and social media services to re-brand the island as a destination location.
  - 4) Short term business loans (2-3 yrs), guaranteed by the City or State, that would replace the current financing, and/or assist businesses throughout the CRC project and rebuilding of Hayden Island.
  - 5) Financial compensation to businesses no longer able to attract customers due to the loss of economic viability of Hayden Island because of the current and anticipated increase in heavy traffic congestion, and access problems.
  - 6) An assistance program in the form of a redevelopment loan or grant, to help fund business operations until bridge plans become certain and economic viability returns.
  - 7) A marketing grant to help spread the news about the Hayden Island business community, Hayden Island's area attractions, and livability.
  - 8) Bridge authorities and government agencies should recommend and frequent local businesses, rent or purchase properties on Hayden Island during the project.
- N-003-027**
- 9) Eminent domain condemnation of Hayden Island businesses should be a serious consideration by federal government, the State of Oregon, and/or the City of Portland, given that their planning indecision and funding uncertainties have been a significant contributor to the negative economic climate on Hayden Island for businesses and property owners.
- N-003-028**
- 10) Website with construction updates, CRC and related agencies contact information, construction/planning schedule, project timelines; overview of CRC, and current Hayden Island Plan.
  - 11) Hayden Island Visitors Center located on the island.

*This list of mitigations is not the final and official word from businesses on the island  
Presented 8/31/11*

Page 1 of 2

plants, to obtain an Air Contaminant Discharge Permit from either DEQ or SWCAA and to comply with regulations for controlling dust and other pollutant emissions.

- Manage construction materials and activities to minimize dust, glare and smoke.

### **N-003-011**

In an effort to reduce the potential for inappropriate use of vacated property, the CRC project may install fencing and signage to minimize the potential for trespassing. These methods will be detailed by the DOT in the construction staging plan, which will be executed by the contractor.

Should these vacated properties become an attractive nuisance, the CRC project could shorten timelines for demolition, or contract with a firm to provide part-time or full-time security. The CRC project team will work with neighborhoods likely affected by project staging to identify a plan that best meets the needs of nearby residents, business owners, and the contractor.

### **N-003-012**

Thank you for your comment. The project will work closely with you, Island residents, organizations, and businesses.

### **N-003-013**

Regarding the potential for inappropriate use of vacated property, please see N-003-011.

The project is working on a construction-period transit plan. Tentatively, these plans include a shuttle service. But how this will aid Island residents will be further developed, and will be discussed with the community as one of many ways to provide mobility on the Island.

## List of Mitigations: Hayden Island Businesses

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- |                  |  |
|------------------|--|
| <b>N-003-028</b> | 12) A hotline for people to call about CRC construction, theft, vandalism, an accident, or if there is a problem associated with the construction.   |
|                  | 13) Financial Assistance to attract new businesses to Hayden Island before and during construction.  |
| <b>N-003-029</b> | 14) Early construction of the Hayden Island local arterial bridge to ease traffic bottlenecks on/off the island during construction.   |
|                  | 15) Create reliable transportation during the construction.  |
|                  | 16) Ensure traffic can enter and exit the island with ease.  |
| <b>N-003-030</b> | 17) Enhanced security services for vacant residential and business properties. More police presence on the West & East sides of Hayden Island.   |
|                  | 18) A satellite police station needs to be placed in a visible location on Hayden Island with routine daily and nightly island patrols!  |
| <b>N-003-031</b> | 19) Home and business inspections before and after construction for any possible damages caused by construction vibrations especially for those that are closer to the staging areas and river.  |
| <b>N-003-032</b> | 20) Additional streetlights need to be added to ensure safety at night for pedestrians and motorists. Especially on the newly created "main street" of town.   |
| <b>N-003-033</b> | 21) City/State/Federal Government need to supply a large billboard alerting drivers on I-5 South and I-5 North that "Businesses Are Open." Also, small signs strategically located throughout Hayden Island and on the West and East sides of the Island for pedestrians, bike riders and slow moving motorists. |
| <b>N-003-034</b> | 22) The Island Community made up of residents and businesses expects support from the City, State, Federal Government, Portland Development Commission; Metro, Business Oregon, Venture Portland, TriMet, and other governing agencies to financially assist in ways to attract more business to the island.     |

*(This list of mitigations is not the final and official word from businesses on the island.  
Presented 8/31/11)*

Page 2 of 2

As discussed in the response to N-003-008, the CRC project is working to minimize temporary impacts during construction that could impede travel in the project area.

### **N-003-014**

Potential noise and vibration impacts that would result from the CRC project were disclosed in Chapter 3 (Section 3.11) of the DEIS, and have been updated in Chapter 3 (Section 3.11) of the FEIS. As described in the DEIS and FEIS, the FTA has also developed impact criteria for acceptable levels of ground-borne vibration. Light rail operations could result in some vibration impacts along 17th Street and Washington Street, all of which could be mitigated by installing vibration isolation between the rails and ground. This has also been updated for the FEIS in Chapter 3 (Section 3.11). No expected vibration-related impacts have been identified on Hayden Island. However, as the approach to construction is finalized, the project will assess the potential for vibration resulting from the staging area activities and construction. If the project identifies any potential for vibration-related impacts, it will work with property owners to minimize such and develop adequate documentation to evaluate such. Before-and-after assessments of building foundations and walls is often part of this evaluation.

### **N-003-015**

Please see the response to N-003-010.

### **N-003-016**

The project has committed to the design and construction of a temporary noise barrier on the far western edge of the Thunderbird Staging Area. The project will work to direct, reduce, and baffle (shield) construction lights which would adversely impact the nearby residents.

The FEIS contains a summary of the information obtained during

preparation of the Hazardous Materials Technical Report. The technical report does have some specific information and research regarding potential contaminants for identified sites. However, it is only for sites identified in regulatory databases, not every property within the corridor. The scope of an environmental impact statement in a large corridor does not include specific on-site investigation of hazardous materials on every single property; it generally looks at summary information for the entire corridor (i.e. regulatory database, aerial photos, Sanborn maps, and windshield survey) to provide an overview of potential issues and how that could impact the various alternatives.

The project will investigate and appropriately handle contaminants found at all properties permanently or temporarily acquired.

**N-003-017**

Construction activities associated with transit and highway improvements have the potential to negatively and positively affect nearby businesses, as described in Chapter 3 (Section 3.4) of the DEIS and the FEIS. For example, construction could temporarily block visibility and access to specific businesses, cause traffic delays, and reroute traffic to detours, all of which could divert customers and hamper business activities. Potential positive construction effects could include increased spending in the project area during construction, which can, for example, increase sales at local shops and restaurants.

The project team will work to minimize negative business impacts and encourage positive impacts. Construction will be carefully planned to minimize road closures and to avoid completely closing access to businesses. When needed, signs would be used to identify temporary access points and the businesses they serve. Detours would be carefully routed to reduce travel times and be signed to reduce confusion. Programs to help businesses affected during construction could include business planning assistance, marketing and retail consulting, or

promotions to generate patronage in construction areas. See Chapter 3 (Section 3.4) of the FEIS for more discussion on temporary construction effects and possible mitigation measures.

**N-003-018**

These elements are all incorporated into the design of the Locally Preferred Alternative.

**N-003-019**

As described in Chapter 3 (Section 3.4) of the DEIS and FEIS, and in the Indirect Effects Technical Report, the CRC project will reinforce the region's goals of concentrating development in regional centers, reinforcing existing corridors, and promoting transit and pedestrian friendly development and development patterns. The project will coordinate with the City of Portland, although specific zoning changes or incentives for transit oriented development are primarily the City's responsibility. However, the multi-million dollar investment provided by the project has been shown to positively contribute to such development.

**N-003-020**

On-street parking is shown in the current roadway designs for Tomahawk Island Drive. The project will work with the City of Portland and the Hayden Island community to refine the parking designations near the LRT station. There will be consideration of accommodating a small area as a "kiss and ride" for residents to be safely dropped off near the station. Delta Park will serve as the nearest park and ride to the Hayden Island light rail station, a distance of 1.17 miles from the Hayden Island light rail station. The distance between the park and ride lots at Expo Center and Delta Park is 0.69 miles.

**N-003-021**

Regarding stormwater facilities, please see the response to N-003-003.



The project has no impact to public parks on Hayden Island and therefore has no need for such mitigation. The CRC project does not currently propose to convert the existing Thunderbird site on Hayden Island into a public park, but it also does not preclude it from becoming a public park in the future. Decisions regarding the disposal of surplus property after project construction will be made at a later date. The eastside multi-use path is part of the LPA.

**N-003-022**

Though the Island may benefit from a new Community Center, it is not the project's role to provide one. The project is providing millions of dollars of improvement for the Island. These investments will be part of the set of incentives that will help drive redevelopment of the commercial areas and will contribute to the vibrancy of Island neighborhoods.

**N-003-023**

Regarding the potential for inappropriate use of vacated property, please see the response to N-003-011.

**N-003-024**

As the project designs progress, there will be more details made available about utility relocations and the specific for Jantzen Avenue. The project is committed to mitigating any impacts to JBMI and is well aware of the needs for infrastructure improvements and post-construction restorations.

Regarding floating home displacements, please see the response to N-003-006.

**N-003-025**

The project will work closely with both the residents and business owners on the island as construction plans are advanced.

**N-003-026**

Regarding the potential for the project to negatively and positively affect nearby businesses, please see N-003-017.

**N-003-027**

The DEIS disclosed all known property acquisitions required to construct the project alternatives. These acquisitions were summarized in the DEIS in Chapter 3 (Section 3.3) and were listed in full in Appendix D of the DEIS. The information associated with each property, such as an address, was pulled directly from the Clark and Multnomah County tax assessors' databases, and therefore was only as up-to-date as that County's information.

Property owners will receive just compensation for the estimated value of land and improvements acquired and for other impacts that result in a measurable loss of value to the remaining property. Following the publication of the FEIS, property owners will be notified of impacts to their property and acquisition negotiations will begin. The acquisition and relocation process will follow The Uniform Relocation Assistance and Real Property Acquisitions Policies Act of 1970 (as amended). The process by which acquisitions will occur is described in the Real Property Acquisition and Relocation Plan and summarized in Chapter 3 (Section 3.3) of the FEIS.

**N-003-028**

Regarding the potential for the project to negatively and positively affect nearby businesses, please see the response to N-003-017.

The project will similarly work to reduce the potential for crime during construction, using lighting, security, and other means.

The project does not have any plans to construct a Visitor Center for the Island. The construction of such a facility is not part of the project's purpose and need. Nor would it represent mitigation for any identified impact to the Island.

**N-003-029**

The project is eager to work with emergency service and utility providers as the design for the LPA and the approach to construction is further refined. The project has already made commitments to maintaining three through lanes, and to construction-period transit enhancements.

Regarding the possibility of early construction of the local multimodal bridge, please see the response to N-003-008.

**N-003-030**

Regarding the potential for inappropriate use of vacated property, please see the response to N-003-011.

**N-003-031**

Section 5.2.2 and Section 6.3.2 of the Noise and Vibration Technical Report discuss construction vibration. Although there are no state or federal regulations related to construction vibration, the contract specification will have a section that would likely limit the contractor to a maximum vibration level. The majority of major vibration-producing activities will be more than 300 feet from the nearest homes at the Hayden Island Manufactured Home Community. Therefore, it is unlikely that vibration levels at that distance will be of sufficient magnitude to result in any structural issues, including structural issues for the manufactured homes.

**N-003-032**

The project will work closely with the community on the design issues for Tomahawk Drive and the light rail station. Especially in areas where pedestrians will pass under structures, there will be a focus on safety and high quality design. The project's designers have been trained in Crime Prevention Through Environmental Design (CPTED), and will work to provide safe environments under the new facilities and elsewhere.

**N-003-033**

There are regulations which govern the placement of billboards and other signage. Within these limits, the project will look for ways to encourage commercial activity on the Island during construction. The project has staff that have specific training in this area and have been successful at retaining businesses during past construction projects in Portland. There will be a program developed, which is now outlined in Section 3.4 of the FEIS. The program will provide details regarding business retention investments, mobility programs, pedestrian routing and safety, and much more.

**N-003-034**

The project will provide a high capacity transit station as well as a safe interchange which will function better than the existing interchange does. These investments will have a beneficial effect on the local economy, though the associated displacements will result in an adverse effect. In addition to providing millions of dollars in improvements, the project will also work with businesses during construction to minimize impacts to businesses and business closures. Parties that are not sponsors of the project have no similar obligation. However, the CRC project will coordinate and collaborate with any other entities working to preserve and cultivate businesses on the Island.

Portland's Directly Impacted Neighborhoods  
Official Comments on the Final Environmental Impact Statement for the  
Columbia River Crossing

October 24, 2011

Victor M. Mendez  
Administrator  
Federal Highway Administration

Peter M Rogoff  
Administrator  
Federal Transit Administration

c/o Heather Wills  
Columbia River Crossing  
700 Washington Street, Suite 300  
Vancouver, Washington 98660

RECEIVED  
OCT 24 7:00  
Columbia River Crossing

N-004-001

We, the neighborhoods of Portland directly impacted by the Columbia River Crossing Project, support the Locally Preferred Alternative Option A provided the project honors its commitments and continues to work openly with the community as we move forward with final design.

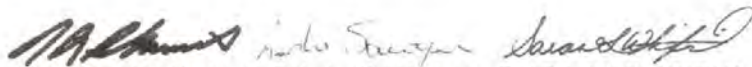
Though we are happy to have reached this important milestone in the development of this complex transportation system for the part of Portland where we live, work, shop and play, there are still many outstanding concerns that need continued good faith work.

The design needs to respect the work of The Hayden Island Plan. The Island could lose 39 local service businesses including its only grocery store and only gas station. 643 people will lose their jobs on the Island; many of those people live in our community. Where are the over a thousand households going to shop for basics now? We need to make sure those real impacts are recognized and that the Island still has a neighborhood center while the project is being built and after the system is opened.

We have consistently supported the construction of a new bridge, but it must be built right - all the way down to the details. Our communities bear the consequences of this project during construction and afterwards. It is important that this project enhances not only the region's transportation network but also enhances the community upon which it is built.

This set of documents is submitted to be part of the FEIS record to memorialize the community understandings and concerns. We want to work even more closely with the CRC project team to together complete a livable design for the Columbia River Crossing.

Sincerely



Hayden Island Neighborhood    Bridgeton Neighborhood    East Columbia Neighborhood

**N-004-001**

Each of the attached comments have been considered and responded to. The project looks forward to ongoing coordination and collaboration with Portland neighborhoods and organizations. As the design progresses, and plans for construction are further developed, the project will continue to keep the community informed, participate in problem solving with local citizens, and seek ways to avoid and minimize impacts.

### **Portland's Directly Impacted Neighborhoods**

Comments on the Final Environmental Impact Statement for the  
Columbia River Crossing

#### **List of Public Comments:**

N-004-001

- **Neighborhoods Impacts Overview** Letter
- **Hayden Island Neighborhood** (HiNoon) Letter
- **Bridgeton Neighborhood Association** Letter +  
34 Signatures of Neighbors
- **East Columbia Neighborhood Association** Letter
- **Hayden Island Livability Project** (HILP) Letter
- **Hayden island Manufactured Home Community** Letter +  
50 Signatures of Neighbors
- **Victor Viets** Letter - List of Hayden Island Issues
- **Brad Howton** Letter - FEIS and the Hayden Island Plan
- **Leslie Sawyer** Letter
- **Tom Dana** Letter
- **Metro Regional Government** Attachment to Land Use  
Approval - FEIS and post EIS Metro Questions and CRC  
Responses
- **Urban Design Advisory Group** White Paper comments  
Build a Better Bridge Faster



## EAST COLUMBIA NEIGHBORHOOD ASSOCIATION

Heather Wills  
CRC Environmental Manager  
700 Washington Street, Suite 300  
Vancouver, WA 98660

Dear Ms. Wills,

**N-005-001**

East Columbia Neighborhood supports the building of a new I-5 bridge, and commits to be a working partner with the CRC project to preserve the quality of life that is so precious to residents of Hayden Island, Bridgeton and East Columbia. The unique characteristics of these neighborhoods is a valuable asset to the residents as well as to the surrounding areas. The East Columbia neighborhood has concerns in several areas. These concerns are outlined below.

**N-005-002**

### **Prior commitments that need to be upheld**

East Columbia supports the Arterial Bridge from Marine Dr. to Hayden Island and the eastside multiple use path but we are concerned they are now referred to as "options". It has been a neighborhood belief that these were components of the bridge project and not options. Both the IPS and Project Sponsors voted unanimously to include these features in the CRC project. These components are vital to the CRC project and should remain as commitments to the neighborhoods that will depend on them for viable transportation options and connectivity to Hayden Island. The Arterial Bridge will provide accessibility on a variety of levels. Of utmost concern is the accessibility it will provide Portland Firehouse Station #17, which provides fire protection service to Bridgeton and East Columbia neighborhoods.

**N-005-003**

### **Incorrect data used for impact statements and assumptions**

The FEIS states it is using 2000 Census data and uses a population of 344 for East Columbia. The 2000 Census Bureau data, Summary File 3 states a population of 1,490. Census Bureau information is easily available from ESRI. The City of Portland has this information from both the 2000 Census and the Census Bureau 2010 Redistricting Data (P.L. 94-174). The CRC should update its census data and the more current and accurate data utilized. As stated in the FEIS, the neighborhood boundaries expanded in November 2008, resulting in the current population being 1,748 according to the US Census Bureau data. Areas encompassed since November 2008 include Dellawood and Fox Run Mobile Home Park – both with a high percentage of low income individuals, and a racially diverse population. These current income and race demographics are also available from ESRI and the City of Portland. There can be no fair or accurate evaluation of impact or demographic description if incorrect and outdated data is used for measurement and evaluation. The CRC assessment of the Area of Potential Impact is incorrect and flawed for East Columbia. These evaluations should reflect the current population, as well as correct data and comparative numbers in terms of describing impact. If the FEIS is to identify impact and the effects of the CRC project on neighborhoods, then factual data should be used to determine those effects.

In the Appendices on Neighborhood Profiles, it is stated that no crime data exists for East Columbia. Since November 2008, the neighborhood has regularly received crime statistics from the N/NE Portland Police Bureau, Community Policing Officers and ONI Crime Prevention Coordinators. This information is readily available from any of those resources and should be incorporated into the descriptive analyses.

The FEIS states there is no neighborhood plan for East Columbia.

In 1990 East Columbia was the first neighborhood in the city to create and have a Natural Resource Management Plan adopted by City Council. This NRMP has been used in recent land use hearings (2009, 2010), Bureau of Planning reports and as guidance for development in East Columbia. It is available on the City of Portland website. It offers guidance for the development and management of the unique natural resources in East Columbia, as well as environmental stewardship. It should be considered and detailed in the FEIS.

The FEIS lists Community/Neighborhood Resources for East Columbia as only an off leash dog park, East Delta Park and Portland Meadows (all of which were added in the boundary expansion of 2008). The Columbia Children's Arboretum, part of the Portland Parks Bureau, is located in East Columbia and its western boundary is NE 6<sup>th</sup> which will see impacts from the realignment of the Vancouver Way interchange. Access to the park will be impacted by increased traffic on NE

### **N-005-001**

Thank you for your comment. Each of your specific issues will be addressed below.

### **N-005-002**

Option A, with the arterial crossing, is the design which will be selected in the Record of Decision.

### **N-005-003**

The demographic data provided in the Technical Reports are specific to the portion of the neighborhood that was within the study area. Project staff were able to better assess each neighborhood by focusing on the portion of that neighborhood which would potentially be directly impacted. That is why the population figures do not match with the total population data for each neighborhood.

Though the NRMP is a beneficial plan to have completed, and will be used to guide the minimization of impacts and development of environmental mitigation, it is not specifically a neighborhood plan.

Thank you for alerting us to the availability of crime data for the neighborhood. The advancement of the LPA's design is not likely to change regardless of the specifics of the reported crimes.

**N-005-003** 6th. The Columbia Children's Arboretum was created in the early 1970s and is the geographical and social heart of East Columbia. The Arboretum is classified as a nature park by PPB and one of only two Arboretums in the City. Additionally East Columbia is home to the Columbia Community Church, which is the monthly meeting place of the neighborhood, as well as holding Sunday services for many in the neighborhood, including Bridgeton residents. These Neighborhood Resources should be listed in the documentation regarding East Columbia.

**N-005-004** **Community Enhancement Funds**  
Over the course of the CRC discussions with neighborhoods, a Community Enhancement Fund has been discussed in various formats. This Community Enhancement Fund should be a vital piece of the CRC project and not an option. In order to best assess the impacts of all aspects of the CRC project to neighborhoods, the CRC must use reliable, factual data to determine the demographics of, and level of impact to, neighborhoods most closely aligned with the project. These demographics will inform the environmental justice impacts to neighborhoods. Levels of impact will vary with neighborhoods and project timelines.

In order to accurately determine the impacts of the CRC project the FEIS should contain data that reliably and accurately describes the neighborhoods, and in the case of East Columbia it does not.

**N-005-005** **Traffic Management/ NE 6<sup>th</sup> Intersection**  
There should be careful consideration taken in the redesign of the Vancouver Way and Marine Dr interchange which will have the direct impact of increased traffic on NE 6<sup>th</sup> Ave. The intersection of NE 6<sup>th</sup>, NE Faloma and NE Marine Dr. is currently classified by PBOT as a level D/F intersection. There should be careful consideration, and a redesign of this intersection as a result of the impact of increased traffic on an intersection located within a school zone and classified at a dangerous level. NE 6<sup>th</sup> is used for TriMet line #8, which draws passengers from East Columbia and Bridgeton. NE 6<sup>th</sup> does not have sidewalks, so pedestrian safety is an issue. The FEIS should include a traffic management plan for the impacts created by this redesign.


**N-005-006** **Tree Canopy removal**  
East Columbia encourages a thorough evaluation of the effects of the planned removal of old growth oak trees along Martin Luther King Blvd, near the Jubitz Truck location. We encourage the CRC project to pursue alternative choices for any tree removal. This area was formerly part of Vanport and is in a managed flood plain, as is all of East Columbia neighborhood. Removal of tree canopy, and especially the number of large trees planned for removal, will adversely affect stormwater runoff in the area. Mention of "tree replacement" should be clearly defined and perhaps the removal of the large trees re-evaluated. There should be a study done to determine how much water will have to be diverted if there is a significant tree removal and how mitigation for this increased stormwater runoff will be handled. These trees not only provide a benefit by diverting stormwater, they provide natural habitat for birds and provide an aesthetically pleasing barrier to the industrial acreage to the east, as well as a shield for areas of East Delta Park to the west.

**N-005-007** **Noise Study Concerns**  
The FEIS assumptions on noise do not include overall noise impacts nor do they accurately reflect impacts on surrounding neighborhoods. The FEIS assumptions regarding the proximity of noise impacts are not accurate, as noise can impact a wide ranging area, well beyond the limited scope presented in the FEIS. East Columbia is directly affected by noise levels from PDX. The western end of both parallel runways are approximately 4,500 ft from the eastern boundary of East Columbia. The level of airport noise is prevalent in our neighborhood, decreasing and increasing depending on wind direction. There appears to be no mention of weather effects for the noise levels created by highway traffic or light rail, or for construction noise. Currently noise from I-5 can be heard in Bridgeton and East Columbia. Noise from PIR can be heard miles in any direction, depending on weather. There should be an in-depth study done on the breadth of noise impacts on surrounding communities already affected by multiple noise producers. Considerations should be taken for weather, duration, and the overall impact that will result in the additional highway traffic noise as well as the limited duration construction noise. Mitigation for these noise impacts, or possible abatement protocols, should be developed. Noise impacts from this project cannot be singularly considered but must be considered as adding to the overall noise impact of the area.

**N-005-008** We hope the CRC will provide a commitment to the community to work openly and transparently on the impacts to neighborhoods. We hope the incorrect data contained in the FEIS can be corrected which will then more accurately reflect the neighborhood demographics resulting in a more reliable projection of impacts to surrounding neighborhoods.

Respectfully,

  
Maryhelea Kincaid  
East Columbia Board, Land Use Chair

  
Sarah Whitefield  
East Columbia Board, Chair

## N-005-004

In the last three years the CRC project team, the Project Sponsors Council, and CRC advisory groups have focused on incorporating a wide range of community enhancements into the project. The project has looked for ways to leverage the highway and transit investments into additional improvements for project neighbors and local communities. These improvements are beyond the benefits identified as the project's purpose and need. These tangible improvements include new local roads and improved local flow and connections for Hayden Island residents; better bike and pedestrian access to the improved facilities; new bike and pedestrian trails; and a separate bridge for local auto access from North Portland to Hayden Island.

The CRC remains committed to aggressively maximizing and leveraging resources to bring additional benefits and improvements to our community. Two options have been identified for further exploration, both include a financial set aside of a specific amount dedicated to a specific purpose. One approach is a project specific community enhancement fund. There is some history with such an approach - the Delta Park 1-5 widening project (2006) and Metro's solid waste program (1991) are two examples. The other approach is a different concept, a regional fund established by the state to benefit the neighborhoods and communities in close proximity to 1-5 and the CRC project. Both approaches have been successfully implemented in the Portland region and will help inform this effort. We need to be clear about both of these approaches - neither will be easy. Both approaches have limitations and legal restrictions associated with anticipated funding sources. Both will require legislative support. Both will likely need enabling legislation and both will require funding.

## N-005-005

The project proposes a major redesign of the Marine Drive interchange. The redesign is intended to improve operational efficiency and safety.



On the east side of I-5, Martin L. King, Jr. Boulevard will become the principal road connecting with the interchange. Alternative routing using a new connection in the vicinity of East Delta Park will allow traffic from N. Marine Drive to connect with the reconfigured interchange. A description of the project's proposed changes for the interchange can be found beginning on page 2-13 of the DEIS.

The entirety of NE 6th Avenue is outside the study area of the project. In the City of Portland's Transportation System Plan, NE 6th Avenue is designated as a local service street, a community transit street, a city walkway for a portion, a local service walkway for a portion, and a local service bikeway. Improvements to NE 6th Avenue and to the identified intersections are best addressed by working with the City of Portland.

**N-005-006**

The LPA shows that several large oak trees and potentially other tree species will likely be removed as part of the Marine Drive Interchange Realignment. The CRC project is committed to minimizing environmental effects of the project. Should those trees need to be removed, compensation in the form of revegetation to City of Portland standards will likely be required. The CRC project recognizes the importance of tree canopy and vegetation in capturing and releasing rainfall. Stormwater treatment systems are proposed that will address stormwater quality and quantity in the Columbia Slough drainage area. Because the number and area of the trees is relatively small in relation to the overall drainage areas, existing interception of rainfall is likely minimal. With the planting of new trees, effects to rainfall interception and aesthetic issues will be limited.

**N-005-007**

Potential noise and vibration impacts that would result from the CRC project were disclosed in Chapter 3 (Section 3.11) of the FEIS. A complete detailed noise and vibration analysis can be found in the Noise

and Vibration Technical Report for the Final Environmental Impact Statement on the Project web site under the Final Environmental Impact Statement. For traffic noise on public highways, the FHWA collaborates with the DOTs to set the traffic noise abatement criteria for highway noise, which are then implemented by the state DOTs.

Noise walls, to the extent that they are effective at reducing noise and can be constructed at a reasonable cost, are the most common type of mitigation for highway noise when project-related noise levels exceed the abatement criteria. The FEIS provides recommended locations for eleven new or replacement noise walls that are preliminarily considered reasonable and feasible by state criteria. These eleven noise walls are effective at reducing noise impacts from approximately 270 decibels under the No-Build alternative, to approximately 110 decibels with the Columbia River Crossing Preferred Alternative. All remaining impacts are at locations where noise abatement was simply not effective, either due to topographical conditions, or because the impacts are at upper floors that are difficult to mitigate with noise walls. Information on the noise walls used to mitigate project-related highway noise impacts can be found in the FEIS (Chapter 3 Section 3.11), with detailed information also provided in the Noise and Vibration Technical Report.

Noise and vibration related to the operation of the light rail and bus facilities are evaluated using the criteria in the FTA Guidance Manual for Transit Noise and Vibration Impact Assessment. Based on the analysis performed for the FEIS, light rail operations are predicted to result in several noise impacts, all of which could be mitigated with a combination of noise walls, building sound insulation, and vibration dampeners installed around the rails. More information can be found in the FEIS Chapter 3 (Section 3.11), with detailed information also provided in the Noise and Vibration Technical Report.

In direct response to your concerns about Portland International Airport

(PDX), the Federal Aviation Administration is responsible for noise from airports. There is no direct connection between the noise from the airport and the noise from the highway or light rail. Also, the noise measurements taken as part of the Columbia River Crossing Project do include the noise from all area noise sources, including both airports (PDX and Pearson Airport), commercial activities, residential activities, existing traffic on I-5, local arterial and connector roadways, and any construction activities at the time of the monitoring. Furthermore, the traffic noise study uses traffic volumes, posted speeds, and vehicle mixtures (cars, delivery trucks, and long-haul trucks and dump trucks) that are projected for the year 2030, and therefore any noise abatement measures are designed to be effective for 20 years.

Atmospheric conditions that can affect the transmission of noise include wind, temperature, humidity, and precipitation. Wind can increase sound levels if it is blowing from the noise source to the receiver; conversely, it can reduce noise levels if blowing in the opposite direction. Noise propagation can also be affected when the temperature gradient is such that an inversion is formed. Other atmospheric conditions such as humidity and precipitation are rarely severe enough to result in significant changes in noise level propagation. However, because weather conditions frequently change, it is not realistic to consider atmospheric conditions in traffic noise studies.

Finally, because the noise models were validated with measured noise levels that, as previously stated, did include all area noise sources, and because the analysis uses projected future 2030 operational information, the study provides a cumulative noise assessment of all noise-sensitive properties that could be adversely affected by noise. That is not to discount the fact that there are many residences that can hear noise from the airports, highways, and other local area noise sources, as these noise sources are all part of living in an urban area. Providing a noise study that included all the area noise sources, (which vary constantly)

under all the varying weather conditions, cannot be reasonably performed. Furthermore, the results of the study would likely yield the same general results: provide noise walls for surface transportation noise to reduce noise levels for those most severely affected.

**N-005-008**

Thank you for your cooperation and comments.

October 24, 2011

Sam Adams  
Mayor, City of Portland  
1221 SW 4th Avenue, Room 340  
Portland, Oregon 97204

Sam,

**N-006-001**

I submitted these comments to accompany the FEIS transmittal to the FTA and FHWA as part of the package of like documents produced by other concerned Hayden Island community groups and individuals. For the most part, they describe decisions made after publication of the DEIS that could adversely affect the Community's opportunity to see its vision implemented. Although I remain optimistic that future discussions will yield solutions to the issues raised here, I'm concerned that the City's goals in this process as they relate to Hayden Island are losing traction. That 'last chance' for Hayden Island's future we all acknowledged three or four years ago is here, today!

### The CRC FEIS and the Hayden Island Plan

**N-006-002**

The Hayden Island Plan, representing a unified vision for the Hayden Island Community, was developed by Portland Planning with direction from a 30 member Island Steering Committee. It was drawn together over a 2 year period beginning in 2007 that included a 4 day public Charrette, and several open houses. The Plan, and its associated ordinances, was adopted by the Portland City Council in September 2009. It was developed energetically and quickly to inform the CRC planning and design processes, and to provide guidance to local leadership during their participation in these processes.

Island residents have contributed a tremendous volume of thoughtful and constructive participation to these deliberations, and have been generally pleased with the agency's willingness to respond to the Island's insistent appeals to comply with the Plan. With the adoption of the final version of LPA (Option A in the FEIS), the community felt reasonably confident we had received a firm commitment to a planning framework that could accommodate its vision. We are disappointed this commitment has not been maintained.

One of the core design elements in the HI Plan assumes the neighborhoods would enjoy a pedestrian oriented 'Main Street' along Tomahawk Island Drive, to include the Light-Rail Station and an **East-Side Retail Center** on opposite sides of the I-5 corridor. This area, zoned General and Neighborhood Commercial, is expected to be developed with new small-scale retail tenants complementing existing service and restaurant businesses, forming a gathering and shopping hub tied to the west side by TI Drive and the planned loop road. The draft FEIS proscribes this concept by locating isolated and restricted stormwater

### **N-006-001**

Thank you for your comments. CRC project staff will continue to work with stakeholders and the public through the design and construction process.

### **N-006-002**

The stormwater facilities shown in the FEIS will continue to be refined as design work progresses. Under the terms of the biological opinion (BO), the CRC project must treat stormwater runoff using bioretention, bioslopes, infiltration ponds, porous pavement, constructed wetlands, and vegetated and soil amended swales designed for infiltration. Based on the information we have on file, stormwater runoff is currently not treated before being released to North Portland Harbor or the Columbia River.

The Hayden Island Redevelopment Plan states that runoff from local streets will be treated in roadside planters and that CRC stormwater will be managed in a "green, state-of-the-art manner." Although the Hayden Island Plan map did not show the constructed wetlands, these are a "green" concept for stormwater treatment, and have been shown in project designs as early as May 2009. The stormwater treatment proposed in the FEIS does include the "green streets" approach proposed in the Hayden Island Redevelopment Plan to the extent feasible. This approach to stormwater treatment is not suitable for streets located under bridges (where it will be difficult to establish plants) or where streets are at or below the seasonal high groundwater table. We will continue to review the developing design to determine whether additional streets lend themselves to this method of runoff treatment. Regardless, the project still needs to manage runoff from almost 28 acres of impervious area consisting of I-5 pavement across Hayden island, associated ramps, the elevated transit guideway, and structures.

**N-006-002** facilities north and south of TI Drive. This would mean a loss of new neighborhood support services, and of a planning element designed to tie the two halves of the island together. This relatively new strategy was brought into the planning mix very recently, and added to the FEIS without consideration for the HI Plan or adequate public discussion. It appears the Island will lose its planned neighborhood retail core for a couple of swamps behind cyclone fences. The community will expect significant mitigation for the loss of this important HI Plan element.

**N-006-003** The HI Plan anticipates at least two significant new **Parks**, located on the north and south sides of the island, partially developed under freeway structures, adding to the very minimal 1 Acre of existing public parkland on the Island. Public discussions and planning sessions led us to believe that land in both sites would be reserved for this purpose, anticipating development by the CRC and/or City of Portland. FEIS documents suggest additional isolated and restricted stormwater facilities will be developed on the north side of the Island under the freeway structures, and planned park facilities are no longer indicated for either the northern or southern sites. Again, this change was added to the FEIS without apparent consideration for the HI Plan, and without adequate public discussion. The community will expect significant mitigation for the loss of this important HI Plan element.

**N-006-004** These changes appear to have been made at the direction of Oregon's Department of Transportation. They represent often repeated examples of unwillingness on the part of the DOTs to candidly consider the impact of 'standard' and 'best' practices on the ability of the community to achieve the pedestrian/bicycle oriented, urban waterfront village represented by the Hayden Island Plan. This unwillingness to consider creative accommodations to the Island community's interests was also represented in their reluctance to provide definition to even preliminary IAMP concepts prior to submission of the FEIS. The design of a pedestrian/bicycle/scooter/vehicle **Circulation Strategy** is a key to the long-term success of the village concept. This environmental matter has been seemingly pushed forward to avoid the effort required for inventive design or the difficult conversations that may be necessary in creating an acceptable solution. The design of the loop road and main-street connecting the light-rail station, shopping center, neighborhood commercial district, grocery, banks, and other services essential to a healthy, self-sustaining community must facilitate this circulation rather than discourage it. The FEIS does not adequately consider these issues.

**N-006-005** The FEIS document suggests, for the first time, that the project will 'displace' 69 businesses, the result of construction activities or planned structures. The HI Plan describes a largely self-sustaining **Community**, with retail, service, light manufacturing, and other commercial activities providing employment and day-to-day neighborhood services to a diverse population expected to more than double in the next 20 years. The potential loss of up to half of the businesses currently in the community will represent a significant set-back to its future. The project needs to consider this loss and its impact on the HI Plan more carefully, make a concerted effort to retain key businesses, and potentially develop incentives to restore lost services.

### **N-006-003**

Regarding stormwater treatment, please see the response to N-006-002.

The process for the final decisions regarding the disposition of any surplus property is made following the completion of construction. The potential uses of this specific site as a park and its potential to be declared surplus property will be discussed and coordinated with residents, local property owners, and project partners.

The transfer of 0.4 acre of surplus land to the City of Vancouver is mitigation for the project's direct impact on the City's existing Waterfront Park, an existing public park and a Section 4(f) resource. The project has no impact to public parks on Hayden Island and therefore no need for such mitigation. The CRC project does not currently propose to convert the existing Thunderbird site on Hayden Island into a public park, but it also does not preclude it from becoming a public park in the future.

### **N-006-004**

The project has endeavored to develop creative solutions for the island, but must do so within established design parameters related to mobility and safety. The project will greatly improve circulation on the island, widening many sidewalks, adding bike lanes, and completing Tomahawk Island Drive. The project is willing to collaborate on an island circulation study, although this would be more appropriately led by the City of Portland.

### **N-006-005**

The FEIS disclosed all known property acquisitions required to construct the LPA. These acquisitions were summarized in the DEIS in Chapter 3 (Section 3.3) and have been shared at numerous recent meetings on Hayden Island and elsewhere.

Since the publication of the DEIS in May of 2008, and the selection of

N-006-005

For the first time in this Hayden Island Community's history, the Hayden Island Plan has provided a view of the future for its residents. Our general goals for the extensive public process and development of the Plan document were to memorialize over 20 years of conversation about the potential of our community, to take advantage of what might be our last chance to formalize a bold, effective plan for the Island's future, and to provide a framework of urban planning tools that can help us implement that vision. We managed the process with the understanding that the CRC Project provided both an opportunity and challenge. We have broadly participated in the CRC's community planning process with the hope and expectation that we would be allowed to protect and implement the values of the Hayden Island Plan. We do not want to see key elements of our vision trampled.

Thank you,

Brad Howton

Chair – Hayden Island Plan Steering Committee  
Member of several CRC work groups, including the Portland Working Group

Copies, via email:  
Nancy Boyd  
Tina Kotek  
Andy Cotugno  
Catherine Ciarlo  
John Gillam  
Barry Manning

the LPA by project partners in July 2008, the CRC project team has been working to minimize the potential property impacts associated with the project's improvements. Though the project team has been working to stay within the existing right-of-way, some property acquisitions will be unavoidable. Property owners will receive just compensation for the estimated value of land and improvements acquired and for other impacts that result in a measurable loss of value to the remaining property.

The future of the Hayden Island Plan and of the island itself will be facilitated by the project. The loss of commercial businesses is regrettable, and the project will continue to try to avoid these displacements. However, the project's multi-million dollar improvements on the island will more than offset these losses. The Hayden Island Plan relies on improved Interstate access and the extension of light rail to the island. The LPA represents the locally preferred alternative to achieve these ends, and has thus been supported by ODOT, TriMet, Metro, and the City of Portland.