



October 23, 2011

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

O-003-001

Thank you for submitting comments. Specific responses to your comments are provided below.

O-003-001 The following comments are submitting on behalf of the Hayden Island Livability Project in response to the Final Environmental Impact Statement for the Columbia River Crossing Project.

I. INTRODUCTION

The Hayden Island Livability Project (HILP) is an organization comprised primarily of residents from the Hayden Island Manufactured Home Community (HIMHC), a majority of who are elderly and low-income with increased rates of health concerns. Broadly speaking, HILP objects to the adequacy of the Final Environmental Impact Statement (FEIS) in that it fails to analyze and address the disparate impacts the project will have on the community, including but not limited to increased cumulative air toxics, decreased access to vital community resources and amenities, increased health risks and diminished quality of life. The methodology used by the Columbia River Crossing agency in determining the demographic characteristic of the community is invalid and masks the true nature of the community as significantly low-income relative to the City and County median household income. The FEIS fails to identify environmental justice impacts and fails to address appropriate mitigation of these impacts.

II. EXECUTIVE SUMMARY

A. Proximity of Staging Area

The FEIS is insufficient because there has not been a decision on the staging area location. The impacts to the HIMHC will be severe if the Thunderbird Hotel is chosen as the staging ground, yet the FEIS does not analyze these impacts. The Thunderbird Hotel likely contains asbestos, lead and other toxins and is on the community's fenceline, and the staging area activities will emit substantial air toxics and dust.

B. Loss of Safeway Grocery

The Safeway grocery store is the island's only source of fresh food and prescription medication. Many community residents are elderly with limited mobility, and rely on the Safeway for their basic food and medicinal needs. The analysis of the impact to the community due to the loss of Safeway is inadequate, as is the analysis of the alternatives and mitigation options.

O-003-001

C. Bridge Access and Utilities Interruption

The FEIS fails to sufficiently address impacts caused by diminished access for island residents and emergency vehicles on and off of the island, as well as disruption of vital utilities due to construction of the bridge and the Hayden Island interchange. CRC must commit to constructing the local access bridge first to ensure continued access on and off of the island.

D. Air Quality

The FEIS fails to consider baseline or existing levels of air toxics and therefore insufficient in its analysis of cumulative (and) health impacts as a result of increased air pollution, both due to construction and increased traffic. NEPA requires hot-spot testing and analysis for a construction project lasting longer than five years that could result in increased carbon monoxide and particulate matter emissions, and environmental justice requires identification and analysis of alternatives and mitigation measures.

E. Noise/ Vibration

Assuming the staging site is going to be at the Thunderbird Hotel, the FEIS fails to analyze the impacts due to noise and vibration stemming from the construction staging ground site, as well as the cumulative noise and vibration impacts in the surrounding community.

F. Hazardous Material

Assuming the staging site is going to be at the Thunderbird Hotel, the FEIS fails to analyze the impacts due to hazardous materials, namely asbestos and lead stemming from demolition.

G. Environmental Justice

The FEIS failed to use appropriate methodology to determine the median household income of the block groups comprising the Hayden Island Manufactured Home Community. The use of Census tract demographics for Hayden Island masks the true low-income characteristic of the 1,300 HIMHC residents, comprising two-thirds of the island's population. CRC was inconsistent in its methodology by relying on Census block group data for Vancouver and North Portland communities. CRC also failed to compare median household income to regional income data. The use of the federal poverty line is inadequate to determine whether potentially impacted communities are low-income environmental justice communities pursuant to Executive Order 12898 and the FTA's Draft Circular on Environmental Justice. HIMHC residents were also precluded from meaningful participation in the development process in violation of NEPA.

H. Project Scoping and Alternatives Analysis

Although the CRC project is a regional transportation project, the FEIS fails to adequately analyze regional impacts, particularly considering the I-205 freeway crossing that is at maximum capacity and the potential alternatives including enhanced railroad or third crossings that would avoid, reduce or mitigate impacts to the HIMHC.

III. SPECIFIC COMMENTS

A. PROXIMITY OF STAGING AREA

- O-003-002**
- The FEIS is insufficient because a staging area for construction has not been identified, therefore precluding analysis of the impacts due to the staging area.
 - The FEIS fails to identify how long the staging area will be in operation, therefore avoiding the requirement to conduct a carbon monoxide and particulate matter analysis.

B. LOSS OF SAFEWAY GROCERY

- O-003-003**
- The Safeway grocery is the only store on the island serving fresh food and prescription medication. Of the approximate 1,300 HIMHC residents, approximately two-thirds are over the age of 65, and approximately one-third cannot drive. Many of the elderly residents have limited mobility and require mobility assistance devices. The FEIS identifies and acknowledges that residents living near the Safeway who have limited mobility or disabilities will be impacted by the loss of the Safeway, but fails to analyze the specific disproportionate impacts to the health and well-being of HIMHC residents.
 - The FEIS fails to adequately analyze alternatives to avoid or mitigate the impacts due to the loss of the Safeway. The FEIS lists four alternative groceries, none of which are accessible without vehicle use, and it fails to analyze the specific disproportionate impacts to the elderly HIMHC residents with limited mobility or disabilities. These residents will not be able to access the alternatives listed in the FEIS.
 - Cash in Carry: primarily for restaurants and only sells in bulk
 - Fred Meyer (Vancouver): 4 miles away, residents will likely have to pay toll
 - Fred Meyer (Kenton): 4 miles away, residents must use light-rail and carry groceries
 - New Seasons (North Portland): 3.6 miles away, too expensive for HIMHC residents
 - Home delivery: too expensive for HIMHC residents, requires internet access, credit
 - The FEIS incorrectly states that the project will not affect a resource of importance to a low-income population (Section 3.5, Question 2). A majority of the HIMHC residents are low-income, and have voiced their concern over losing the Safeway store to CRC for more than two years. CRC failed to analyze the community's reliance and dependency on the Safeway store as a critical resource providing access to fresh food and prescription medication necessary for their health and well-being.
 - The FEIS incorrectly states that the project would not have disproportionately high and adverse impacts on a low-income population relative to more affluent populations (Section 3.5, Question 4). A basic review of the demographics of Hayden Island shows that the HIMHC residents comprise two-thirds of the total island population and that a majority of HIMHC residents are low-income while many of the residents living east of

O-003-002

There are five possible staging areas identified in the FEIS. Please refer to Section 2.3.3 for more detail about these areas. These staging areas could be used by a contractor, or they may choose their own. It is typical during the planning and NEPA environmental impact assessment stage to identify likely staging areas. The project has done so, assessed potential impacts in and near these areas, and has sought to balance many criteria in this selection process, including minimization of impacts to adjacent neighborhoods.

A contractor will determine the exact activities that will occur on any of these sites, or any other site to be used for staging or casting. The contractor, working closely with the DOTs, will evaluate impacts and apply appropriate mitigations, in compliance with applicable federal, state and local regulations. It has been thought that activities at any one staging area would occur for less than five years, for which no CO, PM10, and PM2.5 hot-spot analyses would be required. The project will work closely with contractors to determine a use plan for each area. If any site is to be used for more than five years, there will be a hot-spot analysis completed.

O-003-003

The project has attempted to avoid the displacement of any businesses, though it is not always possible. The project will continue to look for ways in which impacts can be avoided and minimized. The displacement of Safeway is documented in the FEIS (sections 3.3.3, 3.4.3 and in numerous places in 3.5). Mitigation 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. We have been informed that there will be a Target grocery store and pharmacy as part of the redevelopment plan for the Jantzen Beach Super Center. We

O-003-003

the bridge project are more affluent. The project will disproportionately impact the majority of low-income HIMHC residents, who cannot take advantage of alternative groceries or pharmacies off the island to the same degree of the more affluent residents east of the bridge project, who have greater mobility and transportation access.

C. BRIDGE ACCESS & UTILITIES INTERRUPTION

O-003-004

- HIMHC has a high percentage of elderly and disabled residents and residents with poor health, thus necessitating unmitigated access to emergency medical vehicles. Any delay in the arrival or departure of emergency medical service could result in permanent injury or death. The I-5 freeway interchange on Hayden Island is currently the only on/off access to the island. The FEIS acknowledges that the project will result in temporary closure of interchange ramps due to demolition and construction. Even if only one directional ramp is closed at a time, the additional time needed to go north into Vancouver and turn around could be the difference between life and death.
- Option A (the Locally Preferred Alternative), contains a local access bridge that would provide alternative access for residents and emergency medical vehicles. Option B does not contain this local bridge, and the FEIS fails to analyze the impacts to HIMHC residents.
- The FEIS fails to identify phased construction alternatives as mitigation for the disproportionate impacts borne by HIMHC residents, and to analyze the disparate impacts of those alternatives. Building the local access bridge first is necessary to ensure uninterrupted access for emergency medical vehicles.
- The FEIS acknowledges that CRC is “especially aware of the sensitive circumstances on Hayden Island” regarding utilities interruption (including water, electricity and sewage services). Yet the FEIS fails to analyze the potential significance of these impacts on HIMHC residents. Given the “sensitive circumstances,” namely, elderly and young residents with limited mobility, disabilities and poor health, CRC should analyze the health impacts caused by interruption of utilities, and identify alternatives and mitigation.

D. AIR QUALITY

O-003-005

- The FEIS failed to adequately analyze the potential significance of impacts from air toxics because it does not establish the staging area for construction. The FEIS identifies the current site of the Thunderbird Hotel, on the fenceline of HIMHC, as a possible staging area location, reinforced by informal discussion with CRC staff over the past two years. The FEIS fails to adequately analyze the health and cumulative impacts to HIMHC residents from construction equipment and off-road mobile emissions. CRC should have conducted such analysis in advance of the FEIS to determine whether alternative sites exist that would not result in such disproportionate impacts.
- The FEIS fails to identify and analyze the impacts to HIMHC residents as a result of both air toxic emissions from project construction as well as increased traffic after the bridge

understand that officials representing the Super Center initiated a site plan review with the City of Portland for a relocation and expansion of the Target store. Plans submitted to the City of Portland's Bureau of Development Review indicate that the store could include a grocery and a pharmacy. The plans show, for the Super Center as a whole, a space for a pharmacy, and at least one space for a grocer. We will continue to track this as redevelopment occurs.

O-003-004

The project will 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. 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 discussed in Chapter 2 of the Draft FEIS, (Section 2.3.1), but not as mitigation.

O-003-005

The bullet points below respond directly to your comments (in order):

- See the response to comment O-003-002.
- The air quality evaluation presented in the DEIS assessed how emissions would be expected to change by 2030 and how the project would affect emissions of pollutants regulated by state and federal standards as well as vehicle emissions that are not regulated. Oregon and Washington, as well as the federal government, have established ambient air quality standards for criteria pollutants. These standards are based on human health risks. The DEIS evaluation included an analysis demonstrating that the CRC project would allow the region to retain conformity with state and federal air quality standards for relevant criteria pollutants. See the Air Quality Technical Report for a detailed explanation of

O-003-005

project is completed. CRC is required to analyze both the health and cumulative impacts of the project. Analyzing cumulative health impacts requires analysis of the background, or existing, pollution in the community. The community is currently adjacent to a major construction redevelopment project at the Janzten Beach Mall. CRC failed to conduct a baseline assessment of air quality in order to determine if the construction project will result in additional air toxics above health-based benchmarks. CRC also failed to assess mitigation alternatives such as on-site air quality monitoring.

- The FEIS fails to take into account the particular susceptibility of the community. The majority of elderly residents with existing health concerns or disabilities (a significant number of residents depend on oxygen tanks) are likely more susceptible to any increase in air toxics. Air toxics from demolition, non-road mobile emissions (construction), and on-road mobile (vehicles) will disproportionately impact HIMHC.
- The FEIS fails to adequately analyze the wind patterns on the island to determine the degree of air pollution impacts. HIMHC is directly downwind from the Thunderbird Hotel, the likely staging area for the construction, and in close proximity to the major construction of the Hayden Island interchange and bridge project itself. HIMHC residents will suffer a disproportionate adverse impact due its proximity to this construction.
- The FEIS fails to provide any specific details regarding "prompt removal" of dust pursuant to the dust control plan, nor does it specify the types of chemicals that will be used to control dust. The HIMHC contains significant elderly and young populations who are more susceptible to dust inhalation, and the CRC must analyze the likely impacts to the community and identify mitigation alternatives.
- Under the transportation conformity rules (40 CFR 93.123(c)(5)), CRC must conduct carbon monoxide and particulate matter hot spot analyses for any construction activity lasting more than five years. CRC did not conduct a hot spot analysis for the potential staging areas, the Hayden Island interchange site or the local access bridge site, yet the FEIS fails to analyze the likelihood of concentrated construction activity lasting longer than five years. The health of HIMHC residents will be disproportionately adversely impacted should concentrated construction activity at the Thunderbird Hotel staging area, the Hayden Island interchange or local access bridge last longer than five years.

E. NOISE/VIBRATION

O-003-006

- The FEIS acknowledges potentially significant impacts from noise pollution and identifies noise-dampening walls to mitigate this impact for Vancouver residents, but does not identify specific impacts or mitigation for HIMHC residents. HIMHC residents are likely more susceptible to chronic noise impacts given the average age and health of residents. The FEIS fails to adequately analyze cumulative health impacts, including long-term impacts, and alternative actions or mitigation for HIMHC residents.
- The FEIS fails to analyze the degree to which contributing noise from staging area activities are likely to exceed DEQ Noise Source Standards, disproportionately impacting

the state and federal regulations concerning air quality and the evaluation of how the project complies with relevant air quality regulations. See Section 3.10 of the FEIS for an updated explanation of the pollutants regulated by state and federal law.

- Projected reductions in vehicle fleet emissions would result in a 25% to 90% reduction in I-5 related criteria pollutant emissions over existing conditions, even with the anticipated growth in population, employment and VMT. In addition, the build alternatives would provide small further reductions in vehicle emissions at the regional level and for most pollutants in each of the subareas along I-5. CO and NOx emissions would be slightly higher with the project than with No-Build (but still lower than existing conditions) in the I-5 subarea between the SR 14 and SR 500 interchanges, as discussed in DEIS Chapter 3 (Section 3.10) and FEIS Chapter 3 (Section 3.10). The updated analysis conducted for the FEIS resulted in very similar findings to those in the DEIS.
- 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

O-003-006

HIMHC. The FEIS fails to identify and analyze mitigation measures for noise impacts as a result of the use of the Thunderbird Hotel as the primary staging area.

- The FEIS fails to analyze the potential significant impacts from vibration due to project construction and staging area activities on the HIMHC residents. Specifically, the homes in HIMHC are not secured to a foundation and the island itself is fill. Residents' homes, other real and personal property, and residential health and safety could be impacted by vibration caused by project activities.
- The FEIS acknowledges that HIMHC residents are concerned about proximity to the staging area site, yet does not adequately analyze the potential impacts. A statement that "the project has organized many meetings to hear and address these concerns" is inadequate.

F. HAZARDOUS MATERIALS

O-003-007

- The FEIS acknowledges that the Thunderbird Hotel, the likely site for the project staging area, is a former landfill, former site of an auto service station, and is known or suspected to contain pre-existing soil and/or groundwater contamination. CRC has not conducted any testing or screening of this site to determine the extent of contamination. The structure itself may contain asbestos and/or other hazardous toxic materials, all of which may be released into the air, soil and groundwater if the structure is demolished. The FEIS has therefore failed to adequately analyze cumulative health impacts of the project.
- The FEIS acknowledges that the project will result in a minimum of three hazardous materials sites impacting the HIMHC, yet does not identify or commit to remediation of these sites during and after construction.
- The FEIS fails to identify exact locations of the 23 properties older than 1980 being demolished due to the project. These properties are more likely to contain asbestos and lead paint, which may become airborne or contaminate the soil or groundwater. HIMHC residents have been precluded from meaningful participation in the NEPA process with respect to hazardous materials due to CRC's failure to disclose specific necessary information.

G. ENVIRONMENTAL JUSTICE

O-003-008

- The FEIS is inadequate because it fails to recognize the HIMHC as an environmental justice community. There are approximately 1,300 residents of the HIMHC, the majority of which are low-income, elderly residents with limited mobility and/or disabilities with exacerbated health concerns living on social security disability or fixed incomes. CRC utilized an inconsistent and inadequate methodology to determine the demographics of Hayden Island residents. Despite the use of Census block groups to determine the race and income demographics of potentially impacted Vancouver communities and the racial composition of potentially impacted North Portland communities, CRC used the entire Census tract, comprising the entire island, to determine demographics of island residents.

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.
- The dust management plan for construction will establish specific protocols for these potential impacts. And the project will coordinate closely with the public on these plans.
- See the response to comment O-003-002.

O-003-006

The noise study in the FEIS was performed in accordance with regulations from the Federal Highway Administration (FHWA), the Federal Transit Administration (FTA), the Oregon Department of Transportation (ODOT), and the Washington State Department of Transportation (WSDOT). The regulations are designed to protect the health and welfare of communities with maximum allowable noise levels from transportation noise. For highway noise in Oregon, the state and federal criteria for consideration of noise abatement is a peak hour Leq of 65 dBA. A detailed traffic noise analysis was performed for the nearest homes at the Hayden Island Manufactured Home Community represented by receivers PD-9 and PD-10. Under the full Build Alternatives, the future noise levels are predicted at 61 dBA Leq, an increase of 4 to 5 dB over the current levels of 56 to 57 dBA. Therefore the future noise levels are within the federal and state criteria and no noise abatement measures are required. Noise levels in Vancouver, where noise abatement is recommended, range from 66 to 77 dBA Leq or more; therefore, noise barriers are recommended. This is because the residences are as close as 50 feet from the highway, while the residences at the HIMHC are over 500 feet from the new bridge. Also, the noise impact criteria does not differentiate residences based on age, race, religion, or other demographics. All residences are treated equally under the noise impact criteria.

This incorrect methodology masks the significant disproportionate adverse impacts to the HIMHC residents due to the more affluent residents living east of the bridge project.

- Through the public participation, HIMHC residents voiced their environmental justice concerns numerous times, including conducting their own residential survey in determining that approximately 50% of the 1,300 residents are low-income. If CRC was unable to identify the demographics of HIMHC at the block group level, CRC should have conducted a residential survey – similar to what they conducted in potentially impacted Vancouver communities and the small Janzten Beach Moorage community just to the south of HIMHC. Such an analysis reveals that HIMHC has a significant low-income population that qualifies as an environmental justice community, requiring more specific identification and analysis of disproportionate impacts and available alternatives and mitigation and more substantial public notice and participation.
- The FEIS fails to use the correct comparison population in conducting a demographic analysis of the HIMHC. CRC should use regional median household income data (i.e., City of Portland, Multnomah County or Portland Metro region) in comparing the median household income of HIMHC residents. Use of the federal poverty standard cannot adequately determine whether potentially impacted communities are low-income relative to non-impacted communities in the project area.
- The FEIS fails to use the most current and accurate income data in determining the median household income of HIMHC residents. At a minimum, CRC must use 2005-09 American Community Survey data, published in 2010. Due to the substantial concerns raised by HIMHC regarding environmental justice, CRC staff should have conducted a door-to-door residential survey to determine the most accurate household income data. The HIMHC is a discrete, compact community that can be easily surveyed, and does not therefore present an undue burden on the agency.
- By failing to conduct appropriate methodological studies of the HIMHC, CRC has failed to comply with Executive Order 12898, requiring each federal agency to identify and address “disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations.”
- While CRC staff engaged in significant interaction with the HIMHC over the three years of project proposal development, the opportunities for meaningful public participation were in fact limited. CRC initially convened a Community and Environmental Justice Group (CEJG) comprised of community residents and representatives from both Vancouver and Portland communities, including residents of diverse economic backgrounds and ethnicities. While agency obtained a veneer of diversity, the CEJG was not given a basic environmental justice training until two years into the process and precluded CEJG discussion of environmental justice concerns, including specific impacts, mitigation measures and community benefit agreements. CRC disbanded the CEJG prior to release of the DEIS.

The Noise and Vibration Technical Report, an Appendix of the FEIS, contains a section that is specific to the potential noise related to construction. See Section 5.2, Construction Activities, and Section 6.3, Proposed Mitigation for Adverse Effects during Construction. The governing criteria for noise related to construction in the City of Portland can be found in City of Portland Municipal Code Title 18, Noise Control. Chapter 18.10.060 provides the criteria for construction noise. Under the City’s noise control ordinance, virtually all major construction projects require a noise variance if work is planned during nighttime hours or on Sundays. Daytime construction activities are limited to 85 dBA at 50 feet with the exception of trucks (see Section 18.10.020), pile drivers, pavement breakers, scrapers, concrete saws, and rock drills. The contractor would be required to meet the City of Portland Municipal Code Title 18, Noise Control, if the contractor elects to use the site for a staging area. Additionally, the project will require a temporary noise wall be constructed to protect the Hayden Island Manufactured Home Community residents from noise at the Thunderbird staging area.

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The FEIS contains a summary of the information obtained during preparation of the Hazardous Materials Technical Report. The 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, Sanborns, and windshield survey) to provide an overview of potential issues and how that could impact the various alternatives. The FEIS recommends a Phase I/II environmental site assessment in any case of acquisition or property use. These site assessments will include different analyses to determine

H. PROJECT SCOPING AND ALTERNATIVES ANALYSIS

O-003-009

- The FEIS fails to analyze an adequate scope of project impacts due to a limited scope of review. The project purpose is unjustifiably limited to improving freight and traffic conditions along the I-5 freeway corridor, yet the north-south flow of traffic through the Portland-Vancouver metropolitan area is regional in nature, with an additional crossing along the I-205 freeway. By failing to consider regional alternatives, and therefore, regional impacts, the FEIS has insufficiently analyzed the ecological, health-based and cumulative impacts of the project.
- Due to the significant disproportionate impacts on a low-income population, Executive Order 12898 and NEPA require CRC to conduct an alternatives analysis that avoids, reduces or mitigates such impacts. The FEIS fails to consider alternatives including improvements to the downriver railroad bridge such that ships can navigate the high passage point of the existing Columbia River bridge, allowing for more modest development and avoiding the need to raise the draw bridge, which forces cars to idle and emit increased air toxics into the HIMHC.

the possible contaminants at each site. Contaminants may include asbestos in buildings, leaking underground storage tanks, and other toxics. Any identified toxics will be treated appropriately, in accordance with federal, state, and local regulations.

O-003-008

The demographic data presented for the Hayden Island Neighborhood in Chapter 3 (Section 3.5) of the DEIS was taken from the 2000 U.S. Census and cut to the neighborhood boundaries. The U.S. Census estimated a total of 2,071 residents on the Island, which is in-line with the population estimate of 2,155 residents conducted in 2007 by the City of Portland for the Hayden Island Planning process. In an effort to more accurately reflect the Island population, the FEIS assessment is based on data from the 2010 Census, the American Community Survey, and a project-specific survey of potentially displaced households. 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 response to assertions that the Census data misrepresented the affected community. The project utilized the recommended methods for assessing area demographics. In order to better understand the potential disproportionality of impacts, the project went well beyond the standard methods. The displacement surveys were one of the specific ways in which the project assessed the potential disproportionality of the most direct impact a household can experience (a residential displacement). Unlike other populations in the study area, the Manufactured Home Community will not experience any residential displacements. The US Census data indicate that, as a whole, the Hayden Island neighborhood has a lower proportion of minority and low income households than in 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 Hayden Island Manufactured Home Community were not surveyed; but these households also will not be displaced. The impacts to these households will result from dust, noise, traffic delays, and other effects during construction. Because many areas along the corridor will experience similar or more severe impacts from construction, there is very little potential for the impacts on Hayden Island to be determined as being disproportionately high and adverse.

The CRC recognizes that there are low income and minority households on Hayden Island. Any individual households, regardless of the demographics of the surrounding neighborhood, have and will be considered as EJ populations and covered by the Executive Order on Environmental Justice. The implementing federal and state guidelines on Environmental Justice have and will guide the project's consideration of, outreach to, and mitigation of impacts for these households.

Since the CRC is a DOT project, the DOT standard for low-income must be used. That standard is the federal poverty guidelines. But the project has gone beyond the use of just this standard and has, as you suggest, compared the neighborhood's demographics with those in the City, County, and study area.

O-003-009

The comment regarding regional alternatives, issues, and impacts is addressed in the responses to the letter from PEAC.

The project would not have disproportionately high and adverse impacts to minority or low income populations (see Section 3.5 of the FEIS).

Downriver railroad bridge improvements were considered and dropped prior to the Draft EIS.