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Sent: Sunday, October 23, 2011 3:00 PM
To: Columbia River Crossing
Subject: FEIS comments
Attachments: Victor Veits Comments.pdf

NEW Columbia River Crossing (CRC) Final Environmental Impact Statement (FEIS) Issues for Hayden Island --Victor Viets 10/13/11

P-074-001

1. Arterial Bridge is now optional. The East Side Multi-Use Path (MUP) is now an option in combination with the arterial bridge. These are the only options in the entire project. The arterial bridge is listed as the preferred option but no basis for future final decision is provided.
2. Project will now displace 39 island businesses serving primarily local clientele at a loss of \$62.7 million in annual sales and 643 local jobs. "New" business displacements announced in the FEIS include The Chevron station, the car wash, Taco Bell and the Wells Fargo Bank.
3. The HI LRT Station is now shown as a standard TriMet design without a station shelter. The designs that were developed by the PWG with extensive community input are not included. There is no discussion of local handicapped parking and no mention of closure of the existing park and ride at Expo station. There is no discussion of an east-west shuttle bus service to help Island residents get to a LRT (light rail train) station or to any regional bus stop during construction.
4. Storm-water Treatment Wetlands now occupy the entire site of the new local retail center shown in the Island Plan but this is NOT identified as an impact to the community. We have repeatedly asked CRC to move these treatment facilities to comply with the Island Plan.

P-074-002

5. For some reason, the Arterial bridge option uses the entire Safeway site for storm-water treatment while the no-arterial-bridge does not.

P-074-003

6. Hayden Island now has the longest construction time for the entire project-----5-1/2 years. Construction noise (including pile driving) and air quality impacts during construction seem to be ignored.

P-074-004

7. The waterfront park areas identified in the Island Plan are not included and part of the proposed park area is used for additional stormwater treatment ponds. This is not identified as an impact on the community. We have repeatedly asked for this state-owned-land to be made available for park use. On the Vancouver side, the project has created park areas at the bridge landing and donated surplus state-owned-land for park use.
8. The FEIS makes a case that the Island community will benefit significantly from the project and that final design will be consistent with the Island Plan. No long-term impacts on community liveability are identified. This has not been

P-074-001

The Portland Working Group (PWG) was formed in May 2009 to advise the project on transit related issues for the Oregon side of the project, using the LPA and Hayden Island Plan as the basis for discussion. Beginning in September 2009, the PWG held a series of three interactive design workshops and Open Houses with CRC project, TriMet, the City of Portland staff and the general public to develop a set of design principles. The design principles were developed in such a way as to capture the community's values while remaining broad enough to apply to the future station design regardless of CRC project decisions that may affect the position of I-5, local road circulation, and land development patterns.

The resulting Hayden Island Light Rail Station Conceptual Design Report published January 2010 provides guidance to the CRC project, TriMet, and the City of Portland regarding the Hayden Island station design. PWG members reviewed and approved the report. The Conceptual Design Report solidified the Hayden Island Light Rail Design Principles.

The Hayden Island LRT station cross sections in the FEIS show a conceptual design with place holders for station elements. The illustrations show the Hayden Island LRT station as an elevated station with a center platform. During final design, CRC is committed to working with the community to advance the station design.

At the December 2010 PWG meeting, TriMet representatives discussed bus service. TriMet will work closely with the contractors during CRC construction to ensure that Line 6 continues service to Hayden Island. When developing a bus service plan along a new light rail line, TriMet re-evaluates all bus service within the vicinity of the new line with the intention of maximizing ridership and limiting service duplications. As part of this process, TriMet conducts ridership, cost, and operational analyses.

P-074-004

demonstrated given the facts:

-The island will be cut in half by a very un-neighborly concrete barrier that will extend across the entire island and will be 4-6 stories high and several city blocks wide.

-The project will displace virtually all of the locally oriented retail businesses with a loss of 643 local jobs. The losses will include the only grocery store providing full service meat and fresh produce departments, the only gas station, the car wash, one of the two banks, and virtually all the local restaurants.

-The project will preclude future development of the neighborhood retail center called for in the Island Plan and appears to deny public use of the state-owned-lands for planned shoreline parks.

-The project will permanently displace numerous floating residents and will result in loss of local jobs for many Island residents.

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The project will work with TriMet and the Hayden Island community to develop a bus and circulator service plan during construction and after light rail opens in 2019. 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. 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.

P-074-002

With Option A, the multi-use path generates some additional stormwater, which must be managed nearby. Also, the design for Option A evolved beyond the design assumptions in Option B. Option A has been selected in the Record of Decision.

The stormwater facilities shown in the FEIS will continue to be refined as design work progresses. Under the terms of the Biological Opinion, 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. Stormwater runoff is currently not treated before being released to the North Portland Harbor or Columbia River.

P-074-003

Construction-related noise and air quality impacts are discussed in Chapter 3 of the FEIS. The project recognizes that these impacts could disturb and otherwise affect residents and has identified mitigation measures to reduce those impacts. Mitigation commitments are described in the ROD and will be further developed during final design. There will be on-going coordination with local residents on this issue.

P-074-004

Regarding the Proposed Parks

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. Decisions regarding the disposal of surplus property after project construction will be made at a later date.

Regarding the I-5 "Barrier"

Though the project will be higher than the existing facility, the LPA design will be less sprawling across the landscape. Currently, land is unable to be used as it is within DOT right-of-way, inside the ramp loops. The LPA will not use this type of design and will not require these large loops.

Regarding Displacements

Refinements and new information resulted in additional displacements. We do not expect that all the businesses assumed to be displaced will necessarily have to be displaced, but it is prudent to be conservative about impacts in the NEPA process. Also, some of the displacements would be affected only by diminished access, not by demolition. It is possible that some of these properties and buildings could be re-occupied by other businesses that would not be so affected by the revisions in access.

Regarding Stormwater Ponds

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. 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.” It is unfortunate that the HI Plan map did not show the constructed wetlands, a “green” concept for stormwater treatment that has been shown in our documents 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. 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 fulfill that requirement. 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 be further evaluating the potential for infiltration. We will continue to review the developing design to determine

whether additional streets lend themselves to this method of runoff treatment. The project will need to deal with runoff from almost 28 acres of impervious area comprising I-5 pavement across Hayden Island, associated ramps, elevated transit guideway, and structures.