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VIA EMAIL & U.S. MAIL

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

RECEIVED
 OCT 25 2011
 Columbia River Crossing

Re: Comments on FEIS for CRC project
 Hayden Island Manufactured Home Community

To whom it may concern:

B-005-001 This firm represents Hayden Island Enterprises, the owners and operators of the Hayden Island Manufactured Home Community (the "Community"). The Community consists of 440 manufactured home sites, 169 RV sites and a total of approximately 1,500 residents located on East Hayden Island. Hayden Island Enterprises is submitting the following comments on the Final Environmental Impact Statement ("FEIS") for the I-5 Columbia River Crossing ("CRC") project. We spoke with representatives of the Community Homeowners Association about the FEIS and it is apparent that the residents share many of our views and concerns. We request that you forward our comments to the Federal Highway Administration ("FHWA") and Federal Transit Administration ("FTA") as part of their consideration of the FEIS.

1. LPA Option A – local multimodal bridge.

B-005-002 Hayden Island Enterprises strongly urges the FHWA and FTA to select LPA Option A because it is the only viable option. The Integrated Project Staff and the Project Sponsors Council recommend LPA Option A after an extensive public process. Hayden Island Enterprises, the Community residents and the public in general overwhelmingly favor LPA Option A. LPA Option B has not been sufficiently vetted or evaluated, and therefore LPA Option B should be removed altogether.

The LPA Option A proposal to include a local multimodal bridge over North Portland Harbor is particularly important to the Community. It is imperative that the CRC project include a local multimodal bridge so that residents are not limited to using the I-5 freeway ramps for access on and off the island. It is also imperative that the local multimodal bridge be built as part of the initial construction phase and not deferred until the later phases of the project. The need for the local multimodal bridge will be even more important during the I-5 bridge construction.

B-005-003

B-005-001

Thank you for your comment. FTA and FHWA review and respond to all comments received on the FEIS and DEIS.

B-005-002

Thank you for letting us know your preference regarding Option A, and your rationale for that preference. The Record of Decision describes the final decision.

B-005-003

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

2. N. Hayden Island Drive intersection improvement.

B-005-004 Based on our review of the FEIS and conversations with CRC staff at the October 13th drop-in session, it is our understanding that the FEIS proposes to improve the intersection of N. Hayden Island Drive and B Street as a staggered signalized intersection. This intersection design is substantially the same as Concept 4.02 from ODOT's 2009 draft I-5: Hayden Island Interchange Are Management Plan (IAMP).

Hayden Island Enterprises strongly supports this intersection improvement proposal because it is the only proposal considered thus far that maintains the Community's eastern access. This option maintains the Community's existing access and improves the intersection operations and safety. Other options considered by ODOT require the removal of manufactured homes and/or relocation of the access to an area that is not acceptable to Hayden Island Enterprises. This is an extremely important issue for Hayden Island Enterprises and we strongly encourage the specific adoption of this proposed improvement as a necessary mitigation for the CRC project.

3. Use of the adjacent Thunderbird Hotel site.

B-005-005 The vacant Thunderbird Hotel site should not be used for major construction staging because it is adjacent to the Community and will cause substantial impacts to its residents. The FEIS proposes to use the Thunderbird hotel site for major construction staging, but acknowledges that it will exceed acceptable noise levels within the Community and that there is insufficient mitigation proposed. The FEIS provides:

"The western boundary of the Thunderbird Hotel Site is within 50 feet of the adjacent Hayden Island manufactured home community. Depending on the scheduling of staging activities, the particular equipment used, and the location of the activities on the staging site, the DEQ Noise Source Standards could be exceeded at locations within the adjacent neighborhood. If this site is selected for project staging activities, additional construction noise monitoring and mitigation measures, beyond those discussed in Section 3.11.5, could be required." FEIS, Chapter 3.11, p. 3-303.

The Thunderbird Hotel site cannot be used for major construction staging if it will exceed acceptable noise levels within the Community and adequate mitigation has not been proposed.

If the CRC project insists on using the Thunderbird Hotel site, additional mitigation must be provided. The use of this adjacent site will have substantial noise, vibration, visual and dust related impacts on the residents of the Community. In addition to the construction-related mitigation proposed in Section 3.11.5 of the FEIS, the CRC project should limit the type of construction activity on this site to low impact activities, provide noise and visual mitigation walls and screening, and provide large buffers between the construction activity and the Community.

B-005-004

Thank you for your thoughtful consideration of these issues. Design components presented at the Drop-In session do provide the benefits you support and will be part of the final design.

B-005-005

The project is considering different contracting methods, and which specific bridges, roadways, etc., will be part of each contract. There are five possible staging areas identified in the FEIS. These staging areas could be used by a contractor, or contractors may choose their own staging areas. This level of certainty is typical during the planning and NEPA environmental impact assessment stage of a project.

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 identify potential impacts and develop mitigations for these impacts, in strict accordance with applicable federal, state and local regulations. The project has already made commitments related to controlling dust, limiting diesel emissions, and providing temporary noise barriers.

4. The FEIS is inconsistent with the Hayden Island Concept Plan.

B-005-006 The City of Portland recently adopted the Hayden Island Concept Plan to plan for the future growth and development of Hayden Island after an extensive public process. The Hayden Island Concept Plan provides for a self-sustaining community consisting of mixed-use residential and retail commercial developments with an integrated transportation network that provides better connectivity on the island for vehicles, bicycles and pedestrians.

Although the FEIS claims that the final design will be consistent with the Hayden Island Concept Plan, it is in fact inconsistent with the Hayden Island Concept Plan in several regards. The CRC project will effectively split Hayden Island in two and it fails to address the lack of adequate east-west connections. This will be particularly problematic during the construction phase which will last for several years. The FEIS does not adequately address this issue or offer mitigation to maintain the connectivity on Hayden Island.

B-005-007 The CRC project will eliminate numerous commercial retail businesses on the island, including the Safeway, the Chevron station, the car wash, restaurants and the Wells Fargo Bank. Safeway is the only major grocery and pharmacy option, Chevron is the only gas station on Hayden Island and the Wells Fargo Bank is one of only two banks on the island. The proposed stormwater treatment wetlands will occupy the entire site of the future local retail center shown on the Hayden Island Concept Plan. Removing these important retail businesses will force island residents to travel off Hayden Island to obtain basic retail items, which is wholly inconsistent with the Hayden Island Concept Plan's fundamental goal of creating a connected and self-sustaining community on the island. Although mitigation is offered to the business owners who will be displaced, no mitigation is offered to island residents who will lose a large percentage of their local service businesses. The FEIS fails to address this impact or propose adequate mitigation.

B-005-008 The Hayden Island Concept Plan provides for future waterfront park areas under the CRC landings that are not discussed in the FEIS. It is important that right-of-way lands under the landings of the existing and new bridges be made available for shoreline access and park use. The failure to provide public access is not identified as an impact on the community and is in violation of the Hayden Island Concept Plan.

5. Air, noise and vibration impacts.

B-005-009 Hayden Island Enterprises does not believe the FEIS adequately evaluated and proposed mitigation for construction related air, noise and vibration impacts. The CRC project will impact Hayden Island more than any other stretch of the project. The CRC project should be required to provide a baseline air quality test (as opposed to modeling) and air quality monitoring equipment to monitor air quality during construction. Additional noise and vibration mitigation should be provided. Hayden Island is more susceptible to noise and vibration impacts due to the soils and geography. Several residents have commented that recent construction activity on the island has had significant noise and vibration impacts even though this construction activity is much smaller in scale than the CRC project. Therefore, noise and vibration mitigation beyond those measures typically provided for such a project should be provided for Hayden Island.

B-005-006

The Interstate will no more "split" the Island in two than does the existing facility. Though more lanes will be provided than in the existing design, the design will be more compact and not require large undevelopable land within loop ramps. Improvements to Tomahawk Island Drive will significantly improve Island connectivity.

B-005-007

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.

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

6. Sound reducing walls along Hayden Island stretch of I-5 freeway.

B-005-010 The CRC project should include sound reducing walls along the section of I-5 that goes over Hayden Island. The FEIS proposes sound reducing walls along several sections of I-5, but not the section that goes over Hayden Island. This section of I-5 will be in close proximity to the Community and several other residences. The CRC project should provide additional noise mitigation to minimize the noise impacts to these residents.

We appreciate your consideration of our comments and request that these proposals be incorporated into the final design of the CRC project.

Very truly yours,

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EMC/df

Cc: Hayden Island Enterprises

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.

B-005-008

The City's Hayden Island concept plan shows some land near I-5 as "future parks". This area is a combination of privately owned land and I-5 right of way that is owned by ODOT. The CRC would not preclude the development of future parks by the City on properties that are not otherwise required for long-term transportation needs, and ODOT will continue to coordinate with the City on shoreline access and related issues.

B-005-009

The FEIS, the Air Quality Technical Report, and the Noise and Vibration Technical Report evaluate air quality, noise, and vibration impacts--including on Hayden Island--from construction activities. The analysis of vibration impacts includes consideration of soil types. The project also

monitored noise levels on Hayden Island during a test pile program conducted in 2011 (report is included as an appendix to the CRC Ecosystems Technical Report).

The FEIS (page 3-316) describes specific measures for reducing noise and vibration impacts during construction. It also notes that additional noise monitoring and mitigation measures could be required if the Thunderbird Hotel Site on Hayden is used by the construction contractor for staging.

Baseline air quality monitoring would be a very unusual step to take and is not required to understand the project's impacts to air quality. The project does not propose to conduct air quality monitoring during construction because violations are not expected, and monitoring would not be expected to result in reduced emissions (see discussion in Section 3.10.4 of the FEIS). Specific measures to reduce air quality impacts during construction are discussed in Section 3.10.5.

B-005-010

Noise analysis completed for the FEIS (as described in Section 3.11 Noise and Vibration, and in the Noise and Vibration Technical Report) does not predict that the LPA would increase traffic or transit noise above the FHWA or FTA criteria for the manufactured home community property. Therefore, a noise wall is not deemed necessary.