



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 Deltawood 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 affects.

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 6th 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.

Community Enhancement Funds

N-005-004 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.

Traffic Management/ NE 6th Intersection

N-005-005 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 5th Ave. The intersection of NE 6th, 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 6th is used for TriMet line #8, which draws passengers from East Columbia and Bridgeton. NE 6th 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.

Tree Canopy removal

N-005-006 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.

Noise Study Concerns


N-005-007 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,



Maryhelen 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.