

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

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Nancy Boyd  
Tina Kotek  
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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.