

June 30, 2008

Columbia River Crossing (CRC)
Attn: Heather Gundersen
700 Washington Street, Suite 300
Vancouver, WA 98660

N-019-001 Hayden Island Neighborhood Network (HINooN) is the neighborhood association representing all residents and many small businesses on Hayden Island. Hayden Island is the neighborhood most impacted not only by the completed CRC, but also by the property acquisitions, construction and disruptions during and after the process. We have taken great interest in the project and worked closely with CRC throughout the process thus far. The following constitutes our thoughts, comments and recommendations regarding the Draft EIS.

N-019-002 First, we want it clearly understood that HINooN fully supports Alternative 3: Replacement Bridge with Light Rail, with the light rail line adjacent to the bridge and direct auxiliary traffic lanes between Marine Drive and Hayden Island. We have expressed this support in many CRC meetings as well as in writing and testimony to Portland City Council, Portland Planning Commission, METRO and other stakeholder agencies. We are strongly against Alternative 1: No Build. Alternative 1 continues the degradation of air quality, congestion, safety and livability to not only Hayden Island but the region.

N-019-003 While HINooN strongly supports Alternative 3, we are mindful that Hayden Island will bear the highest impacts of the CRC both during and after construction. As proposed, Alternative 3 expands public transport corridors over three times their existing levels on the island.¹ The construction of this mammoth project and its resulting footprint will leave Hayden Island forever changed. HINooN expects to work closely with the CRC, ODOT and other key stakeholders to ensure that the island's livability is enhanced to the highest extent possible under this project. We will expect creative solutions to mitigation, enhancement and compensation from the CRC, the City of Portland and all other involved agencies.

N-019-004 Partly in response to the CRC, we have worked hard with the City of Portland to develop a Neighborhood Plan for Hayden Island. The Plan relies on implementation of an I-5 Replacement option to ensure access and safety improvements to Hayden Island. HINooN supports this and the fifteen other recommendations from the Neighborhood Plan's Steering Group regarding the DEIS [copy attached]. Some of those recommendations are also reiterated in this letter. We expect mitigation, enhancement and compensation to include, but not be limited to, the integration of these recommendations into Final CRC design.

N-019-005¹ The following items constitute our further comments and recommendations regarding the CRC DEIS.

¹ Calculated by comparing the width of existing bridges with widths of those conceptualized in Alternative 3. [Existing: SB lanes= 40', NB lanes=38'; *Alternative 3 dimensions*: SB lanes=99', NB lanes= 99', and transit= 52'. *Existing total*= 78'; *Alternative 3 total*= 250'

N-019-001

Thank you for taking the time to submit your comments on the I-5 CRC DEIS. The project team has worked extensively with the Hayden Island Neighborhood Network (HINooN) both prior to and after publication of the Draft Environmental Impact Statement (DEIS). We look forward to continued discussions about neighborhood goals as the project progresses.

N-019-002

Preferences for specific alternatives or options, as expressed in comments received before and after the issuance of the DEIS, were shared with local sponsor agencies to inform decision making. Following the close of the 60-day DEIS public comment period in July 2008, the CRC project's six local sponsor agencies selected a replacement I-5 bridge with light rail to Clark College as the project's Locally Preferred Alternative (LPA). These sponsor agencies, which include the Portland City Council, Vancouver City Council, TriMet Board, C-TRAN Board, Metro Council, RTC Board, considered the DEIS analysis, public comment, and a recommendation from the CRC Task Force when voting on the LPA.

With the LPA, new bridges will replace the existing Interstate Bridges to carry I-5 traffic, light rail, pedestrians and bicyclists across the Columbia River. Light rail will extend from the Expo Center MAX Station in Portland to a station and park and ride at Clark College in Vancouver. Pedestrians and bicyclists would travel along a wider and safer path than exists today.

For a more detailed description of highway, transit, and bicycle and pedestrian improvements associated with the LPA, see Chapter 2 of the FEIS.

- N-019-005** | • HINooN supports direct roadway access between Hayden Island and Marine Drive. This access is currently provided through auxiliary lanes under the Replacement options and should be included in final design.
- N-019-006** | • HINooN supports the extension of Light Rail from Expo to Vancouver with a transit station on Hayden Island. We are, however, very concerned about the demand for parking at the Hayden Island transit station both from off-island transit users and island residents. As a result of that concern, we support the following:
- N-019-007** | ◦ *Hayden Island Transit Station Access:* We have strong concerns about lack of access to the transit station by Hayden Island residents. Hayden Island currently has no TriMet service except for two bus stops located on the perimeter of the existing interchanges and the Jantzen Beach SuperCenter transit station. We have no east-west public transit service that would serve the proposed transit station. For the transit station to effectively serve island residents, we request the project include transit station parking specifically for island residents and increased east-west public transit service.
- N-019-008** | ◦ *Vancouver SR 14 Park & Ride:* We support the Park & Ride at SR 14 currently included in the Mill Plain MOS Terminus because we believe it will relieve parking pressures from Clark County originators on Hayden Island. The SR 14 Park & Ride should be included in all Vancouver terminus options, not just the Mill Plain MOS.
- N-019-009** | • HINooN supports the roadway improvements outlined on page 2-24 of the DEIS including the widening of Jantzen and Hayden Island Drives and the extension of Tomahawk Island Drive through I-5 from east to west. These improvements are consistent with our draft Hayden Island Neighborhood Plan; their final configurations, including integration of bike/ped and landscaping, should reflect the intent of that Plan.
- N-019-010** | • HINooN notes that the Traffic Technical Report identifies the section of I-5 through Hayden Island as having the highest accident rate of any roadway in Oregon. The highest and most severe accidents in the entire project area currently occur on the NB on-ramp from Hayden Island to I-5. HINooN strongly supports the CRC working immediately with ODOT to implement interim safety measures to reduce accidents and the resulting congestion at this on-ramp.
- N-019-011** | • HINooN recommends the Final EIS update information on island population and demographics currently portrayed in the Neighborhoods and Population Technical Report Section 4.2.3.1.1. We believe the CRC used population data that omitted manufactured and floating home populations, resulting in two-thirds of the island's population not being included in the poverty, race or any other demographic characterization, and misrepresentation of median home values. The City of Portland made a detailed investigation of actual island population in 2007 as part of the Neighborhood Planning process and reported a population of 2,130.
- N-019-012** | • HINooN supports the expeditious, efficient and fair relocation of displaced Hayden Island homeowners and businesses. We are concerned that, overall, the CRC DEIS insufficiently characterizes the project's impacts on our island's residents. As an example, the DEIS does not list displaced floating home properties as Single Family Residences in Appendix D, does not depict these residences on project presentation and report graphics, and largely ignores the influence of the river environment when assessing impacts on them. This incomplete picture and analysis of affected Hayden Island residences understates the mitigation, compensation and enhancement deserved by them. HINooN supports giving top priority to retaining displaced floating residences and land-based businesses on Hayden Island. We further support increased and immediate coordination with Jantzen Beach Moorage and Columbia Crossings regarding displacement and relocation.
- N-019-013** | • HINooN supports full protection and enhancement of the island's natural environment during construction and at full build-out. We support sustainable storm-water treatment technologies that include bio-swales and other natural filtering methods. We support the use of low-sulfur diesel fuel during construction and want EPA's 2004 Non-Road Diesel Rule applied to all project construction equipment whether the Rule's timeframes for implementation have been reached or not. We support sustainable erosion control measures throughout construction; we do not want plastic fences lining the island. We support a final project that leaves shoreline and upland habitat enhanced and more dynamic.

N-019-003

Since publication of the DEIS, the CRC project has worked closely with HINooN, JBMI, the Hayden Island Manufactured Home Association, the Portland Working Group and others to further refine the project design on Hayden Island (please see Chapter 2 of the FEIS, for the most recent design). We will continue to work with residents and interested parties on Hayden Island as the project progresses.

N-019-004

Thank you for taking the time to submit your comments on the I-5 CRC DEIS. We have appreciated working closely with representatives of your organization and other Hayden Island residents. We have integrated the Neighborhood Plan and its recommendations in the neighborhoods analysis and technical report.

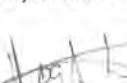
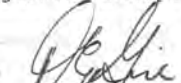


N-019-005

Two design options are included in the FEIS for the North Portland Harbor Bridges. The preferred option, LPA Option A, includes local vehicular access between Marine Drive and Hayden Island on a local multimodal bridge. This new structure would include two lanes of arterial traffic, light rail transit, and a multi-use path for bicyclists and pedestrians.

LPA Option B does not include auto lanes on the local multimodal bridge, but instead provides direct access between Marine Drive and the island with collector-distributor lanes adjacent to I-5. Option B essentially provides an arterial-like crossing over the North Portland Harbor by providing a separate bridge structure, adjacent to the mainline, for an auxiliary lane that connects the Hayden Island and Marine Drive Interchanges. As described in Chapter 2 (page 2-24) of the DEIS, this auxiliary lane allows vehicles to travel between Hayden Island and the Oregon mainland without merging into mainline interstate traffic. This auxiliary lane provides that local connection.

- N-019-014**
- HINooN supports active measures to reduce vandalism, transient presence, and negative aesthetic impacts during project construction. Hayden Island's location on I-5's Washington and Oregon border has traditionally contributed to a higher than average crime rate and transient population on the island. We are concerned that construction activities, including the presence of vacated buildings before demolition, will further increase access for these populations and degrade livability on the island. HINooN expects to work closely with the CRC project to develop measures that protect our property rights and values, and result in increased island security and safety during construction.
- N-019-015**
- HINooN wants increased attention by ODOT to its presence and impact on Hayden Island. We have years of experience of having ODOT as a neighbor, and little of it is positive. If the agency's ownership and occupation of island parcels is to be increased, we expect a much higher level of dialogue, facility attention, and landscape maintenance than we have received in the past.
- N-019-016**
- This letter has expressed support for the CRC Alternative 3 and outlined some specific items of concern and support from the Hayden Island Neighborhood Network [HINooN]. It reflects the dialogue and considered opinions of representatives of eleven homeowner associations that encompass 2,500 residents and a multitude of small businesses. We do not have full agreement on all the issues that will be facing us in the months ahead; we do, however, agree that Hayden Island will be tremendously impacted by the CRC project during and after construction. We will bear the brunt of this project and we expect compensation, enhancement and mitigation to be creative and complete. We expect to be fully engaged with CRC, the City of Portland, TriMet, METRO, SWRTC and other key agencies in the years ahead to realize the improvements contained in our Neighborhood Plan through the CRC project. These include dedication of public park and open space at the site of the vacated Thunderbird hotel, world class bike and pedestrian paths on and serving the island, enhanced habitat and natural areas, and a new publically-owned street system. We also expect to explore creative compensation measures such as toll-exemptions for I-5 north and south bound trips for Hayden Island residents in perpetuity.
- N-019-017**
- To help meet the concerns outlined in this letter and ensure future decisions are fully informed, we request HINooN be represented on the Local Oversight Committee recommended by the CRC Task Force. Although we appreciate the work of Walter Valenta on the CRC Task Force, we were disappointed not to be included on the Task Force and believe Hayden Island deserves to represent its own issues and concerns as the project moves forward.
- N-019-018**
- Finally, we want to express our sincere and heartfelt appreciation to the CRC staff for their work and attention over the past three years. We have found the CRC to be responsive to our requests and interested in our discussions. We especially have appreciated the work of Danielle Cogan and her Communications Team, Frank Green, Kris Strickler, and Heather Gundersen in helping keep us informed.
- We look forward to working with you more closely in the months ahead.

Hayden Island Neighborhood Network [HINooN]

			
Roger Staver Chair	Don Gire Vice Chair	Margaret W. [Peg] Johnson Secretary	Richard Gill Treasurer

3209 N. Scholfield Street, Portland, Oregon 97217 <http://www.haydenisland.org>

N-019-006

Thank you for your comment. Preferences for specific alternatives or options, as expressed in comments received before and after the issuance of the DEIS, were shared with local sponsor agencies to inform decision making.

N-019-007

A park and ride lot on Hayden Island is not anticipated to be provided by the CRC project. It is expected that the majority of light rail transit users boarding at the Hayden Island Station will access the station by bus or on foot. CRC staff will work with the Portland Working Group on design and amenities provided at the Hayden Island Station. TriMet is responsible for bus service on Hayden Island which is outside of the scope of the CRC project.

N-019-008

Thank you for your comment. Preferences for specific alternatives or options, as expressed in comments received before and after the issuance of the DEIS, were shared with local sponsor agencies to inform decision making. The LPA includes a park and ride at SR 14.

N-019-009

The CRC LPA includes the widening of N Jantzen Drive and N Hayden Island Drive, in addition to the extension of N Tomahawk Island Drive. Project staff have worked closely with City of Portland staff and the Hayden Island community to design the Hayden Island interchange, including these local streets, in a way that is consistent with published plans and meets the needs of stakeholders.

N-019-010

I-5 near the Hayden Island NB entrance ramp currently experiences congestion and a high crash rate. Contributing factors include the lack of

Attachment to H/Noon
DEIS Comment
Letter.



June 30, 2008

Ms. Heather Gundersen
Columbia River Crossing
700 Washington Street, Suite 300
Vancouver, WA 98660

Dear Heather:

Thank you for the opportunity to comment on the Draft Environmental Impact Statement for the Columbia River Crossing. Attached are the comments of the Hayden Island Plan Steering Group after reviewing the document.

Should you have any questions, please direct them to Ed Garren, 503-922-0338, ed@edgarren.us or Brad Howton, 503-283-4942, bhowton@pacifier.com. Thank you very much for the opportunity to submit our comments and for your continued cooperation in working with the Hayden Island community in the development of the Hayden Island Plan and the Columbia River Crossing.

Sincerely,

Alice Ann Wetzel
Senior Planner, City Portland, Bureau of Planning
on behalf of Hayden Island Plan Steering Group

cc Hayden Island Steering Group

N-019-019

auxiliary lanes, an existing lift span bridge that disrupts I-5 traffic, narrow shoulders, closely spaced interchanges and short acceleration/merge distance.

The CRC project would address operational and safety concerns in this area through the addition of auxiliary lanes, replacing the existing bridge with a fixed span that avoids disruptions of I-5 traffic due to conflicts with marine traffic, wider shoulders, and replacing the Hayden Island Interchange. The existing Hayden Island interchange would be replaced with an overlapping split single point urban interchange (SPUI). The overlapping configuration allows the effective distance between this and the adjacent interchanges in each direction to be maximized and provides for longer acceleration/merge distances.

Interim safety measures need to consider costs, impacts, and time until reconstruction with the CRC project. The physical constraints of the Hayden Island interchange and the current I-5 Columbia River Bridge are such that putting in place interim safety measures would require a significant capital investment and would likely result in impacts to important resources and/or substantial impacts to traffic operations.

N-019-011

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.



Subject: Comments for the CRC DEIS

The Hayden Island Steering Group is actively involved in the development of a plan for East Hayden Island (the plan). The plan includes a vision for the community and a plan for Hayden Island in accordance with the City of Portland's long-term economic, environmental and livability goals. The Steering Group is an advisory body to the City of Portland staff and Planning Commission regarding recommendations for development of the East Hayden Island Plan. The Steering Group is composed of representatives of key stakeholders or stakeholder groups.

It is noted that the Audubon Society is a member of the Steering Group and has its own stance on the Columbia River Crossing project and did not participate in preparing the submission below. Likewise the Steering Group representative from the Oregon Department of Transportation did not participate in this submission.

The Hayden Island Plan Steering Group at its meeting on 13 May 2008 prepared the following recommendations on the Draft EIS for the Columbia River Crossing:

1. Support the construction of a replacement bridge with light rail transit – Alternative 3 in the Draft EIS.
2. Support the construction of auxiliary lanes connecting Hayden Island to Portland without accessing the main span of I-5.
3. Support light rail transit aligned along the west side of I-5.
4. Support high quality architectural design and construction for light rail station.
5. Support locating the light rail station adjacent to or over the intersection with Tomahawk Island Drive.
6. Support world class bicycle and pedestrian facilities connecting Hayden Island with Portland and Vancouver.
7. Support the extension of Tomahawk Island Drive under the new segment of I-5 through the Jantzen Beach SuperCenter.
8. Support the redevelopment of the Thunderbird Hotel site as a park after the construction of the CRC.
9. Support the redevelopment of the riparian margins and in-stream attributes of the areas under the new and old bridges crossing North Portland Harbor and the Columbia River.
10. Support the redevelopment of North Hayden Island Drive and North Jantzen Avenue as public roads to the west to the center intersection of the Jantzen Beach SuperCenter, as shown in the SuperCenter's current redevelopment plan.

N-019-012

Chapter 3 (Section 3.3) of the DEIS disclosed all known floating home displacements that would result from the two highway and two transit alternatives crossing the North Portland Harbor (pages 3-105 and 3-112, respectively). The DEIS also listed potential mitigation measures tailored to suit the unique situation of the floating home community (page 3-119).

For the FEIS analysis, the CRC project team has worked to better understand the organization of the floating home communities in the North Portland Harbor. As presented in Chapter 3 (Section 3.5) and Chapter 6: Public Involvement of the FEIS, the team coordinated with floating home owners, moorage owners, Boards and management, to gather address and ownership information for each floating home. The impacts to individual floating homes are described in Chapter 3 (Section 3.3) of the FEIS and listed in Appendix D.

In the course of conversations with potentially affected property owners, CRC staff received inquiries about the potential for constructing a new marina to accommodate displaced floating homes. To better understand issues related to new marina permitting and construction, project staff conducted research on the development of marinas. This research found likely challenges to developing a new floating home marina, including the challenge of receiving permits through local jurisdictions and environmental resource agencies. The project is not pursuing construction of a floating home marina.

As with any other acquisitions, the CRC will obtain independent appraisals to determine fair market value for each home that must be displaced but cannot be relocated. Qualified acquisition agents will work closely with each floating home owner to try to arrive at mutually agreeable terms for the purchase of each home. The agents will also provide relocation assistance to all displaced occupants.

11. Support the need for full intersections at the second entrance to Jantzen Beach SuperCenter (to the east of Linens N' Things and Home Depot) on North Jantzen Avenue and North Hayden Island Drive west of I-5.
12. Support right hand turn access for businesses on North Jantzen Drive east of I-5.
13. Support the intersection of North Jantzen Drive and North Hayden Island Drive, as well as the intersection at North Jantzen Drive and Tomahawk Island Drive to be a full turning intersection.
14. Support the establishment of a special system for addressing possible land swaps of land needed by the CRC project for land becoming surplus after the CRC project.
15. Support the sustainable treatment of stormwater in a state of the art facility such as bioswales and other green approaches that mimic the natural environment and do not adversely impact the implementation of the Hayden Island Concept Plan. This stormwater facility should not be located in land that is designated for neighborhood commercial development.
16. Support the development of active use spaces under I-5 and its ramps that are accessible for recreation, walking, boating and other community uses in a manner that is hospitable to the community.

Should you have any questions regarding this submission please contact: Ed Garren, 503-922-0338, ed@edgarren.us or Brad Howton, 503-283-4942, bhowton@pacifier.com. Thank you very much for the opportunity to submit our comments and for your continued cooperation in working with the Hayden Island community in the development of the Hayden Island Plan and the Columbia River Crossing.

Businesses displaced from Hayden Island by project construction are discussed in Chapter 3 (Section 3.3) of the FEIS. Per the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (as amended), displaced businesses would receive a relocation assistance package. Business owners, not project staff, would determine where these businesses would relocate.

N-019-013

The CRC project is committed to minimizing construction, operations, and maintenance related environmental effects. Potential environmental effects, potential measures to avoid/reduce these effects, and measures to mitigate for these effects are described throughout Chapter 3 of the FEIS. These mitigation measures have been developed through consultation with federal, state, and local agencies, and community stakeholders. Please see Chapter 3.14 for a discussion of the stormwater treatment concept associated with the LPA, Chapter 3.10 for a discussion of construction equipment and air quality, and Chapters 3.14, 3.15, 3.16, 3.17 and 3.18 for discussions of erosion control and habitat enhancements. Regarding the use of plastic fencing, although that is a level of detail beyond the scope of this FEIS, construction efforts will comply with relevant regulations for staging site demarcation and sediment control.

N-019-014

In an effort to reduce the potential for inappropriate use of vacated property, the CRC project may install fencing and signage to minimize the potential for trespassing. These methods will be detailed by the DOT in the construction staging plan, which will be executed by the contractor.

Should these vacated properties become an attractive nuisance, the CRC project could shorten timelines for demolition, or contract with a firm to provide part-time or full-time security. The CRC project team will work with neighborhoods likely affected by project staging to identify a

plan that best meets the needs of nearby residents, business owners, and the contractor.

N-019-015

As the project moved into the preliminary engineering phase and FEIS, coordination with the Hayden Island Neighborhood Network increased. The Portland Working Group was established specifically to address the residents' concerns and to create more opportunities for dialogue with Hayden Island residents and other residents and business owners in North Portland.

N-019-016

Preferences for specific alternatives or options, as expressed in comments received before and after the issuance of the DEIS, were shared with local sponsor agencies to inform decision making. Following the close of the 60-day DEIS public comment period in July 2008, the CRC project's six local sponsor agencies selected a replacement I-5 bridge with light rail to Clark College as the project's Locally Preferred Alternative (LPA). These sponsor agencies, which include the Portland City Council, Vancouver City Council, TriMet Board, C-TRAN Board, Metro Council, RTC Board, considered the DEIS analysis, public comment, and a recommendation from the CRC Task Force when voting on the LPA.

With the LPA, new bridges will replace the existing Interstate Bridges to carry I-5 traffic, light rail, pedestrians and bicyclists across the Columbia River. Light rail will extend from the Expo Center MAX Station in Portland to a station and park and ride at Clark College in Vancouver. Pedestrians and bicyclists would travel along a wider and safer path than exists today.

For a more detailed description of highway, transit, and bicycle and

pedestrian improvements associated with the LPA, see Chapter 2 of the FEIS.

N-019-017

The recommendation for HiNooN to be represented on a Local Oversight Committee is noted. The governors of Washington and Oregon decided to form the Project Sponsors Council in late 2008 to provide ongoing advice related to project development. The members include representatives from Portland and Vancouver, Metro Council, RTC and the transit agencies as well as two citizen representatives. While HiNooN was not directly represented on the PSC, project staff met regularly with HiNooN and other community representatives on Hayden Island and their concerns and recommendations were factored into ongoing project design.

Throughout the project development process, oversight has been provided by the U.S. Department of Transportation, through the Federal Highway Administration and Federal Transit Administration, the Oregon and Washington Transportation Commissions and governors from both states.

N-019-018

Since the Draft EIS public comment period, CRC staff have attended multiple meetings of the Hayden Island Neighborhood Network (HiNooN). In addition, staff have also attended the meetings of homeowner associations on multiple occasions and meetings with some HiNooN board members and other Hayden Island residents on other occasions. Representatives of the HiNooN board are active members of several CRC advisory groups (Portland Working Group, Community and Environmental Justice, and Urban Design Advisory Group) and participate in ongoing discussions about project development.

N-019-019

This letter was also submitted as comment L-021. Please see responses L-021-001 through L-021-014.