

**West Hayden Island Community Mitigation Measures**  
**Submitted by HINooN**  
**June 15, 2012**

**Introduction:**

The HINooN organization offers these comments relative to the Port of Portland's plan to develop a marine terminal with industrial facilities on West Hayden Island and the City of Portland's proposal to annex West Hayden Island to facilitate the Port's plan. Our comments are divided into Section 1 that explains our objections to both the Port's plan and the City's annexation and Sections 2-4 that present our **preliminary** development conditions and mitigation measures that must be adopted to protect our community if the City decides to ignore our opposition and proceed with annexation.

Our development conditions and mitigation measures are "preliminary" because after years of study and expenditure of over a million dollars by at least two consulting teams and the City staff, the City's latest consultant, ECONorthwest, confirms that it is still not possible to quantify the harm to the quality of life of Hayden Island residents and businesses. The lack of a Health Impact Assessment is the most flagrant example of the failure to provide critical information to the island community. The neighborhoods closest to the proposed terminal are also some of the most vulnerable in the City due to their advanced average age, their declining health, and their low income status.

If the City intends to approve annexation, that decision must be delayed until an adequate Health Impact Assessment can be completed and presented to the island community for discussion. An adequate Health Impact Assessment must include physically monitoring air quality, sound, vibration, light, and traffic at the present time so that a baseline can be established to compare against and to determine if Hayden Island is already close to or above existing quality standards.

**1. HINooN Opposes WHI Annexation for a Deep Water Marine Terminal Development**

HINooN is opposed to annexation of West Hayden Island (WHI) for development of a Port of Portland marine terminal based on the following community concerns:

- The Port of Portland has not, nor does it intend to, exhaust all available alternatives for port expansion. The draft report dated 11/30/2011 entitled Ports of Vancouver and Portland Coordination requested by Portland City council states, *"There is no interest by port or state authorities, nor is there a proposal to form a joint port authority."* We can not support a proposed project on the Island that destroys our natural resources and harms our quality of life when the Port has no long range master plan that justifies the development.
- Island residents, workers, and business owners will experience the bulk of any significant negative effects of the Port project. These negative effects will significantly impact the

quality of life on Hayden Island while providing few, if any, positive benefits. This issue is further complicated due to the fact that after years of study by at least two consulting teams hired by the City, there has been no determination what the community impacts will be. The City's current consultant, ECONorthwest, says: *"These data constraints and uncertainties surrounding the development scenario prevent us from quantifying and monetizing the effects on Q of L [Quality of Life] measures" ... "By quality of life we mean factors such as noise, light pollution, air quality, and traffic concerns"*. We can not support a proposed project that has failed to identify and quantify its impacts on our community.

- The Port Project is in conflict with the Island's vision of future development. The City's Hayden Island Plan (HIP) calls for significant reduction in retail and commercial areas with growth only in residential land use with a theme of island-water-oriented lifestyle. The Port Project presents a risk that the island will become known as an industrial area and may not achieve the objectives of the Plan. This risk is considerably increased if the Port development were to occur without a WHI bridge as discussed below under item 2. We can not support a proposed project that jeopardizes our community's future.
- The City Council's Resolution 36805 incorporated the CWG Working Principles, Appendix A, which called for *"A positive contribution to the community (e.g. health, transportation, property value, recreation facilities, and opportunities)."* We interpret the principle of a "positive contribution to the local community" to be functionally equivalent in meaning to the "net increase in ecosystem function" applied to natural resources in the same resolution. To date, tens of millions of dollars have been proposed for natural resource enhancements to achieve this net improvement principle, but relatively minimal funds, tens of thousands, have been proposed to achieve a yet to be defined net positive contribution to our local community. We can not support a proposed project that values natural resources a thousand times more than our local community.

## **2. New WHI access bridge requirements**

If the City, in spite of HINooN's community objections and concerns, decides to annex WHI, HINooN believes a WHI bridge is necessary to reduce community impacts for the following reasons:

- The Port's position is that the WHI bridge is not needed or economically justified for anticipated WHI terminal operations but they failed to consider the need for the bridge to mitigate impacts to our East Hayden Island (EHI) community's quality of life. In part, this is because local community impacts have not been quantified or monetized by ECO-Northwest due to data constraints and development uncertainties. We do know that without a bridge link from WHI to Marine Drive, all WHI truck and vehicle traffic would utilize the existing local North Hayden Island Drive (NHID) to and from I-5. This NHID traffic would significantly impact local residents and businesses along the routes to the freeway. Furthermore, the ECONorthwest report concludes: *"To the extent that NHID is the main access for the WHI port and industrial-type development on WHI, it may limit the interest of prospective developers to make the investments that would support the types*

*of growth and development envisioned in the Hayden Island Plan. The risk is that because of the port traffic, EHI develops a feel and reputation of an industrial area, rather than residential or retail area. As a result, future types of development in EHI may not reflect those envisioned by the Hayden Island Plan, and would be less desirable and of lower value.”*

- We believe the \$100 million cost of the bridge may have been overestimated. Previous studies have assumed a four lane structure with two additional bike lanes. A two lane structure may be adequate if use of the bridge is restricted to Port Terminal access only. Furthermore, the bridge would save the \$10’s of millions in costs needed to upgrade island roads to handle traffic without the bridge.
- The need for a WHI bridge has increased recently by the CRC announcement of phased development of the HI interchange. Phase 1, which may be a permanent solution, puts all I-5 south on-and-off-ramp traffic directly into the privately-owned Mall parking lots and internal circulation streets. Introduction of additional WHI truck and vehicle traffic will significantly impact the Mall and local community if the CRC proceeds with its plan. It will also impact Port operations due to increased travel times due to mall congestion, especially during high traffic shopping seasons.

Given these concerns, we recommend development of the WHI bridge dedicated to Port terminal access only, with no connection to NHID (other than for emergency vehicles and security patrols). The bridge should be built as the first step in terminal development so that all terminal construction traffic can use the bridge and avoid NHID.

### **3. Terminal Development Mitigation Measures**

In the event that the City decides to annex WHI for future deep water marine terminal development HINooN recommends the following permit conditions and approaches to eventual development of an advance mitigation plan.

- (1) Terminal development design and permitting approvals should be delayed:
  - a. ---until a Health Impact Assessment has been completed in sufficient detail to quantify and monetize health impacts on the local community from both existing sources and new terminal facilities. East HI is already impacted by port and industrial activity along the Vancouver shoreline, industrial activity in N. Portland and the Port of Portland, rail and river traffic noise and diesel emissions, PDX aircraft noise and air pollution, and by planned Columbia River Crossing construction. The cumulative health impacts of the Port Project and these existing activities should be included in the HIA. Determination of baseline conditions will require multi-year monitoring for air quality, noise, vibration, and traffic.

- b. ---until creation of a Community Health and Impact Mitigation Fund with a management committee to provide noise abatement, sound insulation, air filtration, health services, transportation services and other measures that may be needed to reduce local impacts. Funding level of this mitigation fund should be consistent with the monetized level of total predicted health impacts in the final HIA.
- (2) Terminal development and operation will use Best Management Practices for environmental protection, with special consideration for the following:
- a. Control of air pollutants including on-site sources, ship and tug emissions, and rail sources. Use electric (instead of diesel) vehicles and on-site locomotives. Provide shore-power facilities for docked vessels and require vessels to use the facilities.
  - b. Control of noise and vibration sources, including no-train-horn zones on the island and at river crossings, operator training to reduce rail yard noise and vibration and implementation of lessons learned from other terminals.
  - c. Stormwater management and water quality controls for ships and barges as well as for on-site facilities.
- (3) Advance Recreation Mitigation Measures
- a. Develop on-site public trails as described in the Concept Plan.
  - b. Acquire property east of the BNSF to provide trailhead parking and restroom facilities and additional off-site recreation facilities and other opportunities. The objective would be to acquire 2 parcels currently for sale and portions or the entire third parcel owned by the Manheim Company.
  - c. Develop a recreation master plan for the acquired property working with interested City, regional and State agencies; adjacent landowners; and community groups.
  - d. The Master Plan should include: a Port Terminal Visitor's Center, a Trail Head Display, a Natural Resource Interpretive Center and Educational Facility, a Native American Interpretive Facility, restroom facilities, beach access and picnic facilities on the Columbia and North Portland harbor shorelines, non-powered boat launch facilities on both shorelines and a power boat launch facility on the Columbia, and parking facilities.
  - e. Fund property acquisition, master planning, and facilities' construction before Terminal development.
  - f. Fund and develop pedestrian and bicycle facilities along NHID to link the new facilities in the recreation area to planned multi-use pathways in the CRC project.

- g. Upgrade NHID as needed to accommodate bike lanes and additional recreation traffic. Add at least one signalized intersection on NHID for Manufactured Home Community access.
- h. Develop an interagency security, fire, and public safety program for Port facilities, trails and natural areas on WHI, beaches, and any public areas acquired east of the BNSF rail line. Fund additional safety personnel positions and equipment needed.

**(4) Development with No Bridge.**

In the event that the City annexes WHI without a WHI bridge link to Marine Drive, HINooN will oppose the Terminal Project during subsequent local, regional and Federal permitting.

If the City insists on accepting terminal development without a bridge, the following conditions should be added to those identified above:

- a. Delay Terminal development until the HI/I-5 interchange is developed to its' final design configuration (i.e., after all phases of construction).
- b. Reconstruct NHID between the Terminal and the HI/I-5 interchange ramps. (CRC is not funding local street improvements). Reconstruct other island streets used by port traffic to reach I-5
- c. Maintain residential neighborhood speed limits on NHID.
- d. Retain the WHI Bridge on the TSP and RTP in the event the WHI bridge is needed in the future.