



November 15, 2012

Planning and Sustainability Commission  
City of Portland  
1900 SW 4th Avenue  
Portland, OR 97201-5380

Dear Planning and Sustainability Commission Members,

I'm writing today representing the Coalition for a Livable Future (CLF), a partnership of over 100 diverse organizations and thousands of individuals promoting healthy and sustainable communities. For over 18 years CLF has worked to protect, restore and maintain healthy, equitable and sustainable communities, both human and natural, for the benefit of present and future residents of the greater Portland-Vancouver metro area.

CLF is deeply concerned about the West Hayden Island process and has the following comments:

- The proposals for annexation being proposed by the City and Port are incomplete and lack details. The current timeline for adoption (by the end of the year) will not allow adequate time for public review and meaningful comment. As a city committed to equity, transparency and meaningful public involvement it should be clear that this timeline and process does not reflect these values especially on an issue of this significance.
- We are greatly concerned about impacts on the environment that will be caused by development on West Hayden Island. West Hayden Island is an irreplaceable natural resource and key component of restoring our rivers to health. Our investments in restoring the river will mean little if we simultaneously destroy the few intact large parcels we have left. None of the proposals to date come close to mitigating for natural resource impacts.
- CLF is also deeply concerned about impacts on the Community. This development will be located next to Oregon's largest manufactured home community, a community of over 1,000 mostly elderly, low income individuals that has been in place since the 1960s. The Health Analysis released last week shows that the development will triple air toxic levels to 55 times the state benchmarks and will also lower property values, decrease quality of life and cause community displacement.
- We applaud the Planning and Sustainability Commission for requiring a Health Analysis however this effort will mean nothing if the City fails to follow through and directly address the information in the analysis. Again, we would reiterate that this



report was released only seven days ago and the proposals in front of the Planning Commission today were developed in August before the Health Analysis was even initiated.

- CLF is concerned about impacts to our transportation infrastructure. We would note that the proposals are dependent on the Columbia River Crossing (CRC) being built as per plans on the table in 2011—plans the City knows have already been abandoned. In addition, there remain significant questions as to whether and how the CRC will move forward. We would also note that costs for transportation system improvements that have long been pegged at \$24 million were suddenly reduced by 57% last Friday. Both of these facts cause us to question whether the City has really done an adequate assessment of this issue.
- CLF is concerned about impacts on the Tribes. We have read the letter submitted by the Yakama Nation and believe that it is imperative that the City fully address the concerns that they raise.

The City talks a great deal about the "triple bottom line"—of supporting our economy, our environment and building equitable communities—and we applaud them for doing so. However, honoring these values are only as good as the actions that reflect them. As currently proposed, this project would irrevocably harm both members of our most vulnerable communities and some of our most important, remaining wildlife habitat. It is not enough to simply reduce the harm to a greater or lesser degree. A true commitment to the triple bottom line and equity in particular demands that this project leave the community and the environment **better off** than before it happened. If, in fact, this project is as lucrative as the Port and City claim, then there is no reason and no excuse not to provide the resources to truly and completely mitigate for its impacts.

**CLF strongly urges you to reject moving this project forward.**

Respectfully submitted,

Irene B. Schwoeffermann  
Coalition for a Livable Future