



# PORTLAND BUSINESS ALLIANCE

*Leading the way*

November 4, 2011

The Honorable Sam Adams  
City of Portland  
1221 SW Fourth Avenue, Room 220  
Portland, Oregon 97204

Dear Mayor Adams,

The Portland Business Alliance would like to take this opportunity to convey its comments regarding the two alternative development scenarios being considered for West Hayden Island.

After considering the operational, transportation and natural resource aspects of the two development alternatives, the Alliance believes strongly that Alternative A provides the best outcomes for the broadest number of objectives.

The Alliance's *Checkup on the Portland-Region's Economic Health* showed that the Portland-metro region suffers from lagging per capita incomes and wages relative to peer regions and the national average. Lagging growth in private sector jobs and wages means less revenue to pay for critical public services – schools, public safety, and infrastructure – than would be available if our economy performed like our peers. We evaluated the alternative proposals in light of this information and with respect to the alternative that is best able to create good paying jobs in the city.

Operations. Alternative A presents the best alternative for moving rail off the main line and into the operations area as quickly as possible. As the HDR review of the Worley Parsons rail layout alternatives makes clear, even under Alternative A, large rail unit trains will require significant time to clear the mainline tracks when entering and exiting the Hayden Island facility. With the increasing use and congestion on the mainline, including increased passenger travel, Alternative A provides the best option.

The more challenging rail geometry (tighter rail curve radii, compound curve alignment and steeper grades) required by Alternative B could dramatically increase the time needed to move unit trains on and off the mainline relative to Alternative A. Alternative A appears to provide the opportunity to meet BNSF

standards for interconnection to the mainline whereas Alternative B does not. The HDR analysis also indicates that the ongoing maintenance costs of Alternative B would likely be higher given the more complex geometry of the approaches. Finally, the tighter curves of Alternative B also increase the likely hood of significant wheel squeal for nearby residents.

Alternative B also appears to impact the high voltage transmission lines on the south side of the island. These lines would require relocation, likely further to the south, thus further impacting the east-west wildlife corridor on the south side.

Transportation. Alternative A is a better configuration for a number of transportation functions. The layout allows for less extensive road construction and associated habitat impacts for access to and from the terminal facility. Although the current anticipated site use would probably not require or support the addition of an auto/freight bridge across the Oregon Channel, Alternative A provides better options for such a bridge if it is later determined to be warranted and needed. Alternative B extending farther to the south and leaving a very narrow strip along the Oregon Channel significantly constrains the potential landing area for a future bridge.

Natural Resources. Alternative A provides the best outcomes for the most important and most constrained natural resource value, shallow water aquatic habitat. Alternative A impacts only one-third of an acre of shallow water aquatic habitat and entirely protects the valuable south shore aquatic and shallow water habitats as well as adjacent forest and wetland habitats. Alternative B impacts approximately 18 acres of shallow water habitat, significantly impacting south shoreline habitats and eliminating a valuable riparian patch and leaving a long and narrow corridor that will have minimal natural resource value due to edge effect.

Alternative A is the preferred approach given the habitat needs of Threatened and Endangered Species, particularly salmonids in the Columbia system. Shallow water and riparian habitats are critically important to the recovery plans of those species and mitigation opportunities for these habitats are relatively scarce. Although Alternative B allows for greater patch size in upland hardwood/conifer forests, the two alternatives have virtually identical aggregate impact on the number of acres of hardwood/conifer forests.

Hardwood/conifer habitats are not constrained in the basin and there are abundant opportunities for mitigation.

The Alliance believes the annexation and development of West Hayden Island is a critical piece of the region's economic development strategy. With a tight urban growth boundary and limited opportunities for large lot employment development – to say nothing of the limited opportunities for marine dependent development – West Hayden Island is a unique and valuable employment opportunity. Our objective should be to make this a cost-competitive marine terminal site for our region's exports. The Alliance supports the adoption of Alternative A as the option that provides the best footprint for successful development of a marine employment facility and has the added benefit of having the least impact on the natural resource values of the island.

Thank you for considering our input in this discussion.

Sincerely,

Sandra McDonough  
President & CEO