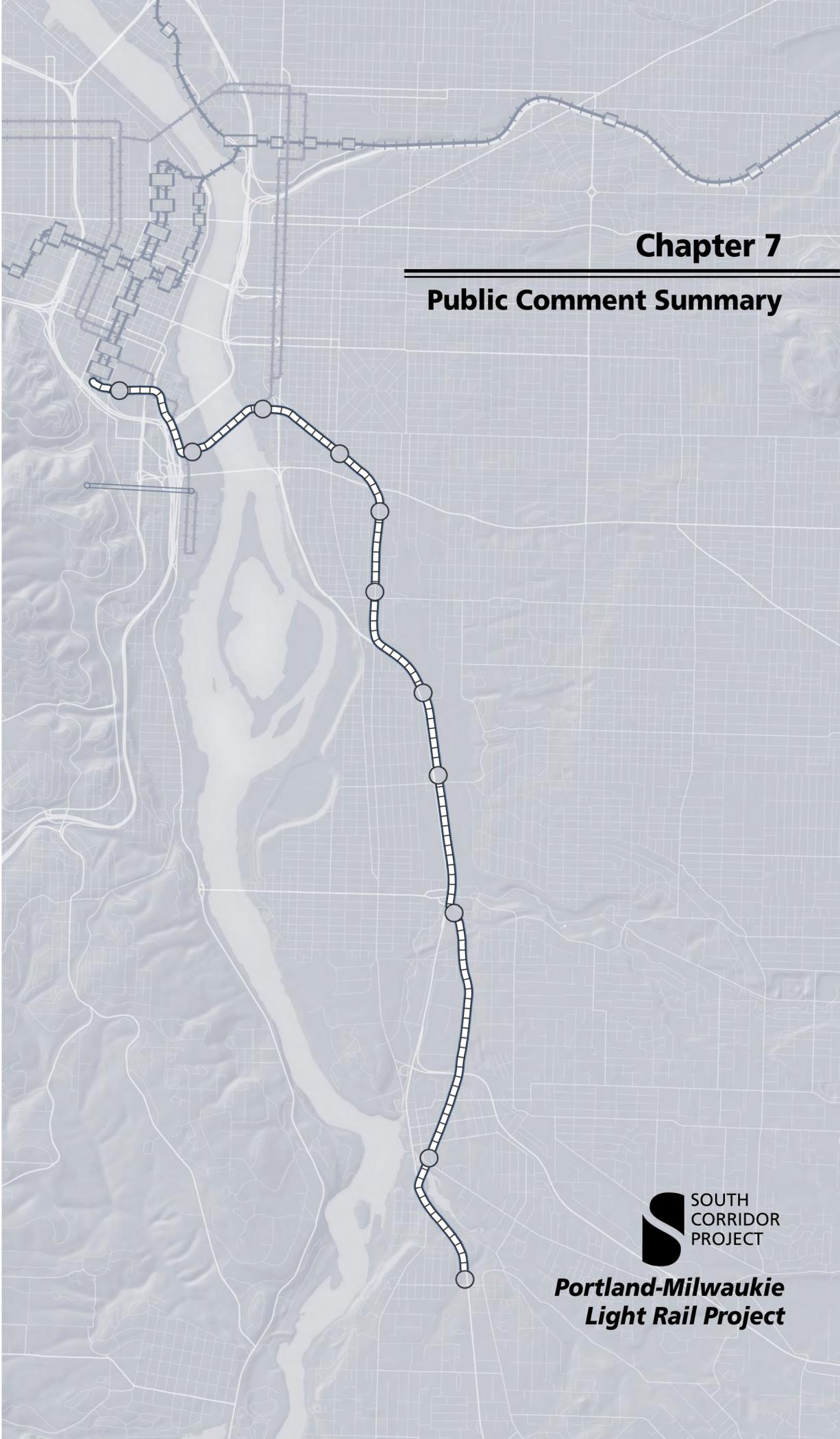


Chapter 7

Public Comment Summary



**Portland-Milwaukie
Light Rail Project**

7. PUBLIC COMMENT SUMMARY

This chapter describes the public and agency comments received on the project during the public review period for the SDEIS, and describes how those comments are addressed in this FEIS.

Section 7.1 provides an overview of the public comment period, Section 7.2 describes the range of comments received, and Section 7.3 provides a thematic overview of the common comments and responses. A full record of the comments and the project's responses is included as Appendix P, Public Comments and Responses.

7.1 SDEIS Public Comment Period

The *Portland-Milwaukie Light Rail Project SDEIS* was distributed on May 1, 2008, and Notice of Availability was published in the Federal Register on May 9, 2008. The document was also circulated and discussed at four community open houses (May 21, 22, 27, and 28, 2008). The 45-day local public comment period ended on June 23, 2008, and included numerous neighborhood meetings and a public hearing on June 9, 2008. The project accepted public comments in a variety of formats, including by email, by written correspondence, through remarks delivered during the public hearing, and by comment forms provided at the neighborhood meetings and the public hearing. All forms of comments received by the close of the comment period have been individually listed by party or individual, and the comments were then further detailed by the topics raised. For the FEIS, the project then responded in writing to all comments made during the public comment period. TriMet, Metro, and FTA also responded through correspondence and meetings to a number of the commenting parties, such as federal or state agencies or others requesting specific information or contact.

The South Corridor Steering Committee made the initial recommendation for the Locally Preferred Alternative (LPA) for the Portland-Milwaukie Light Rail Project. Based on that recommendation, Metro prepared the *Portland-Milwaukie Project Locally Preferred Alternative Report* (Metro 2008) to document the amendment to the 2003 LPA and define the elements of the 2008 Portland-Milwaukie LPA.

7.2 Comments Received

A total of 339 comments were submitted in the form of 150 emails, 11 public testimonies at the public hearing, 123 comment cards, 52 letters, and 3 telephone messages during the 45-day public comment period. The majority of these comments came from individuals, largely residents living adjacent to or near the proposed facility.

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The project also received over 51 comments from government agencies, public institutions, businesses, and organizations.

Of the comments received, the majority supported the Portland-Milwaukie Light Rail Project, although a solid minority had concerns about key elements or opposed the project as a whole. A substantial number of people were neither clearly in favor of or opposed to the project, but expressed preferences regarding specific issues, ranging from station choice to bridge location. Project supporters were more regionally focused and included mobility and environmental benefits as key reasons for their support. Most people voicing concerns cited the alignment through Milwaukie as their primary issue. Others questioned the overall project on the basis of cost, benefits, impacts, or the underlying need for a transit improvement.

The section is divided by themes—first a summary of comments supportive or opposed to the project, and second comments related to other public concerns, including comments related to design options, technical issues (e.g., safety and security, traffic, public involvement, and the environment), project scope, and breadth and depth of the SDEIS. The full record of public comments is included in Appendix P, Public Comments and Responses.

7.2.1 Comments Supportive of the Project

Project supporters looked forward to accessing places around the region using light rail, and having a quicker commute and easier access to downtown Portland and Milwaukie, as well as to regional destinations like the Oregon Museum of Science and Industry and the Oregon Zoo.

A number of people mentioned a desire to reduce dependence on automobiles. Many cited the project's potential to reduce emissions, others looked forward to lowering their gas expenses, and those without cars anticipated more complete transit options. Others focused on light rail's ability to provide another transportation choice in light of ever-increasing traffic congestion.

Many people highlighted the value of development and business opportunities associated with light rail and encouraged specific alignment and station location alternatives. Others welcomed light rail as a community-building enhancement to neighborhoods. Some people also believed proximity to light rail stations would increase property values. Others described the benefit for visitors and regional tourism.

Some supported the project because they believed light rail to be an acceptable way to manage regional growth while addressing pollution and congestion. Finally, a number of individuals simply expressed support of the project, noting that it should be built as soon as possible.

People expressing support for the project were mostly individuals. However, a sizeable group of organizations or businesses also expressed clear support for the project:

- Portland neighborhood associations or association members: HAND (Hosford-Abernethy), SMILE (Sellwood-Moreland), Buckman, Brooklyn, and Reed
- Milwaukie Neighborhood District Associations or association members: Hector-Campbell and Island Station
- Businesses or business organizations: Central Eastside Industrial District, Clackamas County Business Alliance, Dark Horse Comics, Balzer Pacific, and Mason Supply

- Educational institutions: Oregon Health & Science University (OHSU), Portland State University, Reed College, and Portland Community College, and three people associated with St. John the Baptist School and Church
- Community organizations: Oregon Museum of Science and Industry, REACH Community Development Corporation, Willamette Watershed, Willamette Pedestrian Coalition
- Governmental or semi-governmental organizations: Oregon Department of Transportation (ODOT), North Clackamas Parks and Recreation District, and Oregon City Transportation Advisory Committee

7.2.2 Comments Expressing Major Concerns or Opposition to the Project

Most concerns about the project came from the southern portion of the alignment and were focused on light rail operations in downtown Milwaukie and the possible extension to Oak Grove. People were concerned about light rail negatively impacting downtown Milwaukie and the nearby schools and residences. Many felt that light rail would not be consistent with the character of downtown Milwaukie. A significant number mentioned safety and security for the four nearby schools – Portland Waldorf School, Milwaukie High School, St. John the Baptist School, and Winterhaven School – as well as potential noise, congestion, and construction impacts.

Some people suggested other alignments or stations for light rail, such as a terminus north of Milwaukie. Several commenters felt that the range of alternatives being considered was too narrow and that they were being given only one choice – either for light rail or against it.

Project and operating costs provided the basis for another set of issues. Concern about costs included personal costs and benefits related to fares. Others said a nearly \$1 billion in investment would be better spent on other projects like roads and buses.

Some people voiced apprehension about reduced parking in neighborhoods around the stations. Others believed that operation of the light rail would lead to congestion of local roads. The fact that the project will displace businesses caused some people to oppose the project for fear of its detrimental effect on local economies.

People expressing concerns were primarily individuals, most associated with St. John the Baptist Catholic School and Church and Portland Waldorf School. In addition, the Linwood Neighborhood District Association and representatives of the CATO Institute, the Cascade Policy Institute, and a transit and railroad advocacy group also supplied comments.

7.2.3 Summary of Other Public Concerns

Predominant issues of public concern can be organized into four sections: (1) comments relating to design options, such as alignment and station choices; (2) comments relating to other issues such as environmental concerns or cost; (3) comments focused on the project scope; and (4) comments focused on the breadth and depth of the SDEIS. The comments received on these issues are summarized in the following sections.

7.2.3.1 Comments Related to Design Options

This section presents a summary of the comments that focused on specific design elements or decision points. The preferences relayed here illustrate the range of comments received.

River Crossing

The SDEIS studied four new locations for a river crossing of the Willamette, in addition to the alignment favored in 2003. Three issues were raised pertaining to the river crossing: (1) the location of the crossing, (2) the type of bridge selected for the crossing, and (3) the height and width of the crossing.

The location of the proposed river crossing generated about twelve comments with ten in favor of a Porter-Sherman alignment over the other choices. OHSU identified a variation of Sherman-Porter as a promising option, and stated its interests in developing its properties in partnership with the light rail project.

A few people suggested avoiding the construction of the new bridge by connecting to the light rail alignment in the Rose Quarter rather than beginning in downtown Portland.

Four people expressed a preference for a cable-stayed bridge because it was considered more aesthetically pleasing. Four comments were received regarding the bridge height. These comments included oral testimony from the owner of the Portland Spirit, a letter from the Central Eastside Industrial District, an email from the U.S. Army Corps of Engineers, and a letter from the Columbia Region Harbor Safety Committee suggesting that the bridge be constructed with river traffic in mind. These commenters recommended either a bridge higher than 75 feet, or the installation of a draw, lift, or swing bridge. The Port of Portland provided a letter stating a preference for a two-pier cable-stayed design because of its ability to provide greater navigational clearances.

Several commenters, including ODOT and a coalition of bicycle users, suggested wider multi-use paths on the bridge. Some suggested that a lower bridge could be easier for more people to use for walking and biking. The U.S. Army Corps of Engineers provided a comment from its local permitting office that requested more information on alternatives that would use an existing bridge.

Alignment through Central Eastside Industrial District and SE Portland Neighborhoods

Several comments identified the importance of industrial businesses in areas along the light rail alignment. A letter from Mason Supply, a business owner in the Central Eastside Industrial District, cited concerns about maintaining access, parking, and loading areas for its business. Other comments by organizations, businesses, and individuals raised concerns about displacing businesses along SE 17th Avenue. Several comments also mentioned impacts to nearby residential areas, including impacts from the loss of business uses that buffer the neighborhood from traffic, as well as potential loss of parking. Portland Community College wrote to express its support for the project, and noted that the Central Eastside Industrial District was important both for training and future employment for its students. The letter urged that business impacts and the loss of industrially zoned lands be minimized.

The Central Eastside Industrial Council (CEIC) wrote to express support for the project, but asked that work continue to address specific design concerns, particularly a transit-only traffic signal at SE 8th Avenue and SE Powell Boulevard. The CEIC urged efforts to minimize potential loss of living wage jobs currently provided in the area.

Alignment through North Milwaukie Industrial Area

The light rail alignment through the North Milwaukie Industrial Area could follow SE Main Street (2003 LPA alignment) or an existing railroad line called the Tillamook Branch. Most of the comments were from businesses and a law firm representing business and property interests in the north industrial area. All of these letters supported the Tillamook Branch alignment because it reduced or avoided impacts to the industrial area compared to the 2003 LPA alignment, particularly traffic and property impacts. Several of these letters provided background information on their businesses, including a 2006 economic study that identified more than \$300 million in economic benefits generated by business activities in this area. Many of these letters reinforced the findings that the 2003 LPA alignment along SE Main Street would involve acquisitions, street and intersection modifications, increased traffic, and a park-and-ride site that would make it difficult or impossible for some properties to continue as viable business operations. ODOT also supported the Tillamook Branch alignment because it would have fewer traffic impacts on SE McLoughlin Boulevard.

Terminus Options

The SDEIS studied two terminus options at the southern portion of the alignment. The most southern terminus option is at SE Park Avenue in the unincorporated area of north Clackamas County. This terminus would also include a 1,000-space park-and-ride facility. The other option for a terminus is in downtown Milwaukie at SE Lake Road. This terminus could include a 275-space park-and-ride facility.

Of those commenting on the terminus option, more than five times as many people supported a SE Park Avenue terminus compared to a terminus at SE Lake Road. Thirty-three people supported the line's terminus at SE Park Avenue, with many also supporting a park-and-ride facility there. People liked SE Park Avenue's central location, accessible by SE Oatfield and SE Lake roads as well as by SE McLoughlin Boulevard, because it would draw potential riders from Oak Grove, Gladstone, and Oregon City. People felt this location would allow the greatest redevelopment opportunities.

In contrast, eight people preferred SE Lake Road as the line's terminus, believing that it would cost less than a terminus at SE Park Avenue, produce less noise and vibration, and have fewer impacts on parks. Others questioned whether there would be sufficient ridership south of Milwaukie for an extension of the line and a station south of Milwaukie. Some suggested that if a station were built at SE Lake Road, it ought to be the only station in Milwaukie, in order to reduce the light rail's impacts on traffic and downtown businesses.

Station Options

The SDEIS evaluated station options along the alignment. Those in the southern portion of the alignment generated the most comments. The Harold Station option in southeast Portland also

elicited significant support. Comments on the stations are presented from north to south along the alignment.

A few people expressed support for the RiverPlace station, suggesting it provides good connectivity to RiverPlace and OHSU and because South Waterfront is already being served by the Portland Streetcar.

Thirty-two people supported the station option at SE Harold Street. Some Sellwood-Moreland residents argued that the Bybee and Holgate station locations would be a further and more difficult walk and that a station at SE Harold Street would provide more feasible access to the light rail. Some residents believed a number of benefits would follow a station at SE Harold Street: increased property values, more stable schools, local business opportunities, and greater community cohesion. Also, several people noted that students and staff at Reed College would be able to access the light rail from the Harold Station. Concerned with hazards to pedestrians crossing at SE McLoughlin Boulevard, some people urged the construction of a pedestrian overcrossing to the station. As the neighborhood's population grows and gas prices rise, supporters argued that more and more residents will wish to utilize car-free transportation alternatives, such as light rail.

Four people opposed the station at SE Harold Street. One believed that the stop would be redundant, with nearby stops at Bybee and Holgate stations. One person felt that the crossing at SE McLoughlin Boulevard was dangerous, but found a pedestrian overpass too costly. Another argued that a station at SE Harold Street would make sense only if it were surrounded by high-density development, which it currently is not.

Four people supported the proposed Milwaukie/Southgate station and park-and-ride, believing it will help alleviate congestion in downtown Milwaukie.

The station option at SE Harrison Street received no supportive comments. Four people opposed the station, concerned that it would be too close to the Portland Waldorf School. This sentiment was also expressed in discussions with Portland Waldorf School leaders and parents during project-hosted meetings held to share SDEIS findings and discuss the school's questions and concerns.

Two comments expressed support for a station at SE Monroe Street, while six people opposed the station. Apprehensive about traffic congestion, some suggested that the alignment follow SE McLoughlin Boulevard instead.

The proposed station at SE Washington Street received four supportive comments. Twelve people opposed the station, concerned that its proximity to St. John the Baptist Catholic School would endanger the students and cause congestion and noise.

Five people supported the proposed SE Bluebird Street station, arguing that it would prevent congestion in downtown Milwaukie by allowing bus riders headed north to transfer to light rail before entering town. Three people opposed the proposed station on the grounds that its inclusion would create more traffic congestion.

7.2.3.2 Comments Relating to Technical Issues

This section presents a summary of the comments that focused on other issues, such as general community and environmental concerns. The preferences relayed here are meant to be illustrative of the comments received. The full record of public comments is included in Appendix P, Public Comments and Responses.

Safety and Security

Safety and security issues were mentioned by 99 commenters. Some people referred to security problems on MAX in Gresham and Hillsboro and were apprehensive about how these problems would be prevented on the Portland-Milwaukie line. Some did not believe that security would be addressed on the line and, on these grounds, opposed the project in its entirety. People expressed concern about security on the train and urged increased surveillance by more staff and conductors. People were also concerned about security off the train, and worried that more foot traffic would bring an increase in theft and threaten neighborhood security.

In downtown Milwaukie there are four schools in proximity to the proposed alignment. Sixty-two people objected to the proximity of the alignment to schools and churches, concerned that children would be put at risk due to increased traffic, more passing trains, and potential crime in station areas. Eighty comments were received from people associated with St. John the Baptist Catholic School and Church, many following a similar format. The Portland Waldorf School wrote a letter expressing specific concerns regarding their school and said that the SDEIS should discuss impacts in addition to those required under federal environmental regulations. The school also had a representative on the project's Citizen Advisory Committee who shared these and other Portland Waldorf School concerns.

Traffic

Sixty-six people referred to traffic, with seven people believing that traffic will improve in the corridor as a result of light rail and 59 noting traffic as a concern. About eight people believed that the alignment would create traffic congestion that would impact their business, school, or church. Fifty-one felt light rail would create traffic that would clog local roads. Some commenters requested that the project not result in any reductions in travel lanes for vehicles along the alignment. A specific concern mentioned by the CEIC was the intersection of SE 8th Avenue and SE Powell Boulevard, which they said is critical for their transportation needs. The group recommended routing buses to a different intersection, which would avoid the need to install a stoplight at that location.

ODOT provided a detailed letter stating its opinions on design features and alignments that ODOT felt had the potential to affect operations on transportation facilities under its jurisdiction. ODOT stated support for the Porter-Sherman river crossing option, a Tillamook Branch alignment, the downtown Milwaukie alignment, and the extension to a SE Park Avenue terminus. ODOT is opposed to an at-grade crossing of SE McLoughlin Boulevard. ODOT is also opposed to a design with a signalized transit-only left turn at SE 8th Avenue and SE Powell Boulevard. Other concerns included the width of at-grade rail crossings adjacent to the Union Pacific Railroad corridor, and potential issues involving traffic control devices.

Noise and Vibration

Fifty-two people, all but one from the southern end of the alignment, were concerned about the noise generated by the light rail. Some Milwaukie residents were concerned that the noise from the light rail would distract students in the schools or churches adjacent to the alignment, and some suggested using a different alignment. One person asked what could be done to mitigate noise and vibration. Another questioned the methods used to evaluate noise and vibration impacts. The project also conducted an additional vibration measurement inside the Portland Waldorf School, and shared the test results with the school and community.

Cost

The project's predicted cost was an issue for about 27 people. Some opposed the entire project because they believed that it could not be implemented at a reasonable cost. Others, while supportive of the idea of light rail, found fares too expensive to make a new light rail line convenient, or felt the line would not be cost-effective given projected ridership. Others argued that the project should focus on buses rather than light rail, believing that buses had lower capital and operating costs. A few people thought the project's funding could be better spent on upgrading roads, because they believed that the majority of commuters drive alone, rather than using public transit. These concerns led some to voice a desire to not contribute their tax dollars to the project.

Some people referred to cost to explain a preference for a particular alternative. For example, one person suggested that building a new bridge would be too expensive and that the alignment should cross the Steel Bridge.

Parking

Twenty-three people voiced concern about the light rail's impact on neighborhood parking, while others suggested that the light rail project would create more parking given that fewer people would be driving. Especially in proposed station areas where no park-and-ride facility was planned, residents were fearful that commuters would drive to the station and park in spots normally dedicated to neighborhood use. Several people asked that measures would be taken to ease parking impacts in neighborhoods.

Bicycle and Pedestrian Issues

Twenty-one people addressed bike and pedestrian issues, with many urging that each station be guaranteed adequate bicycle and pedestrian access. Comments focused particularly on the crossing over SE McLoughlin Boulevard south to the Harold Station option and the crossing over SE Powell Boulevard near the proposed Clinton Station. People also urged that more attention be paid to enhance the track crossings at 14th, 15th, and 16th avenues near the Clinton Station. In addition, there were requests for secure bicycle parking at the Tacoma and Harold stations.

Natural Environment

Fourteen commenters supported the project, attracted to its potential to reduce dependence on cars. One person felt light rail would not reduce energy use compared to autos.

The Oak Grove Sanitary District provided a letter focused on the need to coordinate design to avoid impacts to a facility it owns near the Park Avenue park-and-ride station. They also provided comments about water quality and environmental issues related to potential crossings of Courtney Springs Creek and Kellogg Lake/Creek, both of which are tributaries to the Willamette River.

Park and Recreation Facilities

Some commented on the light rail's proximity to the planned Trolley Trail in Clackamas County. A letter from the Trolley Trail planner for North Clackamas Parks and Recreation District raised a few questions and concerns about impacts to the trail, but stated that with close coordination and thoughtful mitigation some of these issues could be resolved. North Clackamas Parks and Recreation District stated that if the final decision is to extend the light rail project to SE Park Avenue, Metro and TriMet will coordinate design, phasing, and mitigation strategies with the Trolley Trail to ensure the successful completion of both projects.

Other comments took issue with the displacement of parks or open space required by certain alignments, encouraging the study of alternative alignments with less of an impact. One commenter noted that the past, present, and future impacts to Kellogg Lake were not sufficiently analyzed in the SDEIS.

Citizen Involvement

Seventeen people were dissatisfied with role of citizen involvement in the project, expressing the feeling that public opinion played an insignificant role in important decisions or that they had voted against funding a similar project in the past and were frustrated to see it up for discussion again.

7.2.4 Comments Relating to Project Scope

Approximately 40 people voiced objections to the alignments studied and preferred to see the alignment follow another route. Nine individuals encouraged the extension of the light rail to Oregon City. In a similar sentiment, others encouraged the line's extension as far as possible. Conversely, some people were adamantly opposed to the line continuing south to Oregon City. In Milwaukie, people suggested an alignment down SE McLoughlin Boulevard and Highway 224. Other people suggested a terminus north of Milwaukie's downtown. In Portland, a few people suggested an alignment that did not cross the Willamette River, with a north/south connection to the Yellow Line.

Some people expressed specific concerns about the project's compliance with National Environmental Policy Act guidelines related to the analysis of all reasonable alternatives. Others questioned the SDEIS section that explained how alternatives were eliminated during previous processes.

7.2.5 Comments Relating to Breadth and Depth of SDEIS

Some people did not clearly indicate support or opposition to the project as a whole, but focused their comments on the analysis or improvements to the project. Others asked questions about the SDEIS document or specific environmental issues. A few people commented on the new light

rail line's influence on other transit connections. About 20 people voiced concerns about the breadth and depth of the SDEIS. These comments included, but were not limited to, the following issues:

- Requests to study different alignments in downtown Milwaukie
- Questions about or requests for more definition about cost calculations
- Incomplete or inadequate description of pedestrian and bicycle overpasses, or light rail overpasses (e.g., at SE Powell Boulevard)
- Concern about adequate attention to mitigation of impacts along SE 17th Avenue
- Incomplete or inaccurate depiction of Trolley Trail and SE McLoughlin Boulevard

The U.S. Environmental Protection Agency (EPA) requested additional information be provided as part of the FEIS to address avoidance, minimization, and mitigation measures, primarily focused on impacts to waterways including the Willamette River. For instance, the EPA recommended design options that would involve the fewest number of piers in the water for a new Willamette River bridge.

People whose comments focused on project scope were primarily individuals, although a sizeable number of businesses and other organizations also commented:

- Portland neighborhood associations or association members: SMILE (Sellwood-Moreland)
- Milwaukie Neighborhood District Associations or association members: Island Station
- Businesses or business associations: Portland Spirit, Portland Futsal
- Educational institutions: Portland Waldorf School, about 25 people associated with St. John the Baptist Catholic School and Church
- Governmental or semi-governmental organizations: Oak Lodge Sanitary District, U.S. Environmental Protection Agency, U.S. Army Corps of Engineers, Port of Portland, Columbia Region Harbor Safety Committee

In addition, several businesses in the North Milwaukie Industrial Area provided comments in support of the Tillamook Branch alignment and expressing concerns about the SE Main Street route and its impacts on their operations.

7.3 Common Comments and Responses

This section outlines the common comments and responses for the project. Common comments fall into four general categories: supportive comments, comments opposed to the project, comments raising specific issues related to the project, and comments related to project scope. Responses are summarized here and provided in full in Appendix P, Public Comments and Responses.

Comments supportive of the project or specific elements. Many comments expressed support for the project in general. Others focused on particular aspects, including:

- *River crossing alignment* – a modified Porter-Sherman river crossing alignment was selected as part of the LPA.

- *Single station in downtown Milwaukie at SE Lake Road* - The LPA includes a single Milwaukie station at SE Lake Road, and was endorsed by participating jurisdictions in summer 2008.
- *Terminus at SE Park Avenue* - The LPA for the light rail project includes a terminus at SE Park Avenue, and a phasing option also allows completion to SE Park Avenue for a lower initial cost.

Comments opposing the project. Some comments voiced opposition to the project in general. The response to these comments indicates that participating jurisdictions endorsed the LPA in summer 2008. Other comments expressing opposition focus on specific project elements and are included below.

Comments raising specific issues. Many comments focused on a particular area of alignment or theme.

- *Harold Station* - The LPA identified a future station at SE Harold Street. Most of the station area is within one-half mile of either the Bybee Station or the Holgate Station, and most riders could currently be served by the existing #19 or other bus routes, which will have increased reliability and decreased travel times with the new Willamette River bridge. As a part of future area planning processes conducted in coordination with the City of Portland, ridership, cost-effectiveness, alternative funding sources, land use, zoning, infrastructure (including a pedestrian bridge), and bus routing options that would support a station at SE Harold Street will be evaluated. The LPA to Park Avenue included infrastructure to support the development of the station; the LPA Phasing Option does not include the infrastructure. See Chapter 2 for more information.
- *Safety and security related to enforcement* - Crime levels along light rail project corridors are typically closely related to the existing crime conditions that prevail in the surrounding community. To ensure safety around light rail operations and facilities, TriMet applies design measures with education and continued outreach to nearby schools and community organizations and facilities. TriMet uses a combination of design, public education, and operations measures to lower the potential for crime and to minimize potential conflicts among trains, people, and other vehicles. TriMet's Transit Police Division currently consists of 58 sworn officers, and an additional 30 TriMet staff members are dedicated to checking fares and issuing warnings, citations, and exclusions for riders without a valid fare. Another 46 TriMet supervisors check fares as a part of their daily duties. The TriMet Code includes penalties for fare evasion and rowdy or intimidating behavior on the system. Riders can also be immediately excluded from the system for up to six hours, and can receive longer exclusion periods of up to 90 days. Juvenile detention allows for a safety hold of up to 36 hours for repeat offenders violating the TriMet Code or engaged in certain criminal activity, so officials can work with the youths and their families to stop the activity. The agency also has an established transit rider security program that combines TriMet enforcement with public safety resources from other jurisdictions. See Section 3.16 for more information on safety and security.
- *Proximity of schools in downtown Milwaukie* - The alignment through downtown Milwaukie lies within the existing, active railroad right-of-way. The project will improve existing conditions by constructing safety fences, crossing gates, and pedestrian zones, and safety

treatments will be designed to meet all applicable standards and regulations. All pedestrian crossings occur in their current locations and will be improved as a result of the light rail project. Improvements may include pedestrian crossing control structures such as zee crossings, which compel pedestrians to slow down and increase awareness when crossing light rail tracks, and part-time warning systems, which flash lights in the direction of pedestrian traffic when trains are approaching. To ensure safety around light rail operations and facilities, TriMet combines design with education and outreach. This includes classroom assistance to educate school-age children about safety around and on rail vehicles. Successful programs for other lines in operation near schools include the Lloyd District light rail stations, and a partnership with Operation Lifesaver to provide safety education to residents and school-aged children near the Westside Express Service Commuter Rail line. See Section 3.16 for more detailed information about safety.

Comments related to project scope. Other comments raised alternatives outside of the scope of the Portland-Milwaukie Light Rail Project and adopted LPA.

- *Other alignments in Milwaukie* - The LPA alignment and stations serving Milwaukie reflect an extensive public planning process dating back to 1993. This process included detailed reviews of the alignments and transit technologies that were found to best meet the project's purpose and need, providing effective service to the city and the region while minimizing environmental impacts. See Chapter 2 for a summary of the alignments, including the factors shaping the selection of an alignment in Milwaukie. Previous studies covering the project corridor include: *South/North Alternatives Analysis*, 1993-1998; *South/North Corridor Project DEIS*, 1998; *South Corridor Project SDEIS*, 2002; and the *South Corridor Portland-Milwaukie Light Rail SDEIS*, 2008. In addition to the Chapter 2 discussion, Appendix L presents a chronicled summary of alignment studies. The routes studied are shown in Figures L-5 and L-6. The Milwaukie Transit Working Group process in 2003 recommended the Tillamook Branch alignment in the North Milwaukie Industrial Area. The Refinement Study in 2007, due to concerns about the Tillamook Branch alignment through downtown Milwaukie, evaluated alignment options between Highway 224 and SE Lake Road along SE McLoughlin Boulevard or SE Main Street and also a SE McLoughlin Boulevard/SE Main Street couplet option or a SE Main Street/SE 21st Avenue couplet option. A series of public workshops and hearings before the Milwaukie Planning Commission and Milwaukie City Council during June through August 2007 resulted in elimination of the SE McLoughlin Boulevard options and SE Main Street options, including the couplet options, for not meeting the Portland-Milwaukie Light Rail Project purpose and need.
- *Extending the alignment to Oregon City* - The southernmost point of the Portland-Milwaukie Light Rail Project is SE Park Avenue. An extension of light rail to Oregon City on SE McLoughlin Boulevard or any other route is outside the scope of this project. See Chapter 2 for a description of the project's scope.

7.4 South Corridor Comments

The South Corridor project provided responses to public comments received in the 2002 *South Corridor SDEIS* when Metro and TriMet released the FEIS for the I-205/Portland Mall project (November 2004). The responses to comments received regarding the Portland-Milwaukie portion of the corridor noted that a subsequent alternatives analysis and an SDEIS would be

needed for the Portland-Milwaukie Light Rail Project. These parties were also included on the project's mailing lists when the Portland-Milwaukie Light Rail Project re-initiated its SDEIS process in 2007 and when it issued the SDEIS for public review in 2008. Beyond general support or opposition to the project, the earlier SDEIS comments fell into three general categories, as described below.

Comments no longer within the scope of the currently proposed project. Some comments are no longer within the scope of the alternatives or actions the 2008 SDEIS analyzed. Chapter 2 and Appendix L of this FEIS describe the project's decision process since the 2002 SDEIS, including how prior alternatives and other elements of the project were refined or eliminated from consideration. The comments in 2002 included general statements, opposition or support for the following:

- Widening SE McLoughlin Boulevard in Oak Grove
- Bus rapid transit
- Use of the Hawthorne Bridge
- Alignments no longer considered as alternatives
- Comments related to Harmony Road
- Transit center near Portland Waldorf School in Milwaukie
- Stations options in Milwaukie no longer considered as alternatives
- Streetcar
- Fixed-guideway transit in general

Comments supportive of the project as a whole, or voicing support for a particular area. Some comments focused on general support for the Portland-Milwaukie Light Rail Project. Others pointed to specific project elements, including:

- *Station along SE 17th Avenue* - There are two stations planned for SE 17th Avenue, at SE Rhine Street and SE Holgate Boulevard. (See Chapter 2 for more information.)
- *Pedestrian and bicycle access* - Pedestrian and bicycle access has been an important element in the light rail project's design, which includes access to stations, a 14-foot-wide path on the Willamette River bridge, and enhanced bicycle parking. (See Chapter 4 for more information.)
- *Southgate option* - The Southgate option was eliminated with the 2008 LPA. (See Chapter 2 for more information.)

Comments raising issues of concern. Some comments pointed to particular issues related to the development of the Portland-Milwaukie light rail alternative being considered in 2002, and similar issues were again raised in the 2008 SDEIS. These include:

- *Traffic* - The impacts on traffic were a concern for parties in several portions of the alignment, particularly in the North Milwaukie Industrial Area. A comprehensive analysis of traffic impacts as well as proposed mitigations for the full alignment is found in Chapter 4.

- *Transit-oriented development* - The scope of the project did not include rezoning or redevelopment proposals; however, fixed-rail projects are known to stimulate more intense development or redevelopment where the zoning allows. Additional information is provided in the FEIS Section 3.2, Land Use and Economy.
- *Pedestrian and bicycle access* - Pedestrian and bicycle access has been an important element in the light rail project's design, which includes access to stations, a 14-foot-wide path on the Willamette River bridge, and enhanced bicycle parking. See Chapter 2 for a description of the project, and Chapter 4 for more information on pedestrian and bicycle system functions.
- *Public outreach approach* - Some parties requested more detail on the public involvement program and wanted additional opportunities to participate. Chapter 6 of this FEIS details the public involvement programs and activities subsequently conducted during the Alternatives Analysis, scoping, SDEIS, FEIS, and Preliminary Engineering.