EXECUTIVE SUMMARY

Introduction

Summary of outreach activities

Summary of comments received during public comment period
INTRODUCTION

This document presents the record of public comment for the Lake Oswego to Portland Transit Project. The publication of the project’s Draft Environmental Impact Statement on Dec. 3, 2011, initiated a 60-day public comment period that culminated on Jan. 31, 2012. The public comment period provided the opportunity for people to review the DEIS and give their opinions, concerns and feedback to project staff and decision-makers.

The DEIS presents details of the project alternatives and their environmental and transportation performance to decision-makers and the public to help them identify a preferred alternative. The DEIS examines three alternatives: streetcar, enhanced bus and no-build.

The streetcar alternative proposes to extend the existing Portland streetcar tracks and service between Southwest Bancroft Street in Portland’s South Waterfront District to Lake Oswego, generally parallel to Highway 43, adding approximately six miles of new streetcar track, 10 new streetcar stations and two park-and-ride facilities. For most of the alignment, the streetcar tracks would use the right of way purchased by the Willamette Shore Line Consortium in 1988. The enhanced bus alternative proposes to modify bus service between Lake Oswego and Portland and to construct a park-and-ride facility in Lake Oswego. The no-build alternative proposes no major transit investment in the corridor.

Metro and project partners created numerous opportunities for people to engage in the issues included in the DEIS and learn about the benefits and tradeoffs of the alternatives. What follows is a description of the outreach activities undertaken during the course of the project study and public comment period, a synopsis of the comments received during the public comment period and copies of the actual comments received and outreach materials.
This document provides a summary of all public outreach conducted during the preparation of the Draft Environmental Impact Statement for the Lake Oswego to Portland Transit Project.

PREVIOUS PHASES
Public outreach for previous project phases are documented in the refinement study report, public scoping report and the alternatives analysis public comment report and addendum. These reports are available on the project website at www.oregonmetro.gov/lakeoswego.

6002 COORDINATION
See the 6002 Coordination Plan for federal, state and local agencies, available on the project website at www.oregonmetro.gov/lakeoswego.

COMMUTER OUTREACH
In fall 2009 and winter 2010, the project reached out to Highway 43 commuters through employer-based discussion groups, presentations to community groups and information booths at farmers’ markets.

Employer-based groups
The employer-based discussion groups were held in two formats: 1) with key business groups to bring them up to speed on the project, ask for feedback and revisit them as appropriate and 2) with the assistance of large employers recruiting their employees to participate in lunchtime discussions.

Business groups:
- Portland Business Alliance Transportation Committee
- Lake Oswego Chamber of Commerce
- Portland Freight Committee
- Clackamas County Business Alliance

Employee/student/resident discussion groups:
- OHSU (with employees)
- PSU (with employees)
- Marylhurst
- Mary's Woods
- Lewis and Clark College

During the discussions, the project team explored participants’ values about transportation choices and asked for feedback on topics, like:
- What are the biggest concerns/issues you see in the Highway 43 corridor today?
- How do you commute? What influences your decision about how to commute?
- What factors could change your commute mode?
- When you decide how to commute, how big a factor is travel time? What about reliability?
- Do you support additional travel choices in the corridor? If yes, what would you think if that additional travel choice results in longer travel times for people in cars?
Farmers’ markets

The project team hosted booths at farmers’ markets in West Linn, Lake Oswego, Milwaukie and Hillsdale and in front of Albertsons in Lake Oswego to raise awareness about the project. The project team asked visitors several questions about commuting, allowing people to share their thoughts in response to open-ended questions, such as:

- Do you commute on Highway 43? How often? How (by car, transit, etc.)? For what purpose (work, recreation, etc.)?
- If you commute on Highway 43, where do you live? Where do you work?
- On this list of things that may affect your choices on how to commute, which are relevant for you (check all that apply)?
- What do you think of the possibility of streetcar between Lake Oswego and Portland? Would you consider riding it?
- What do you think about the possibility of streetcar on Highway 43 between Willamette Park and downtown Portland?

Community group presentations

- Sellwood-Moreland Improvement League (Dec. 2, 2010)
- South Portland Neighborhood Association (Jan. 6, 2010)

Either Councilor Robert Liberty or Councilor Carlotta Collette, project steering committee co-chairs, attended each of the events with the exception of the Sellwood-Moreland Improvement League meeting.

Each discussion led to different concerns and presumed benefits of the project, based on location of the discussion, origin (home) of the commuter, past issues with transit service and industry interests. Business groups often focused on potential development opportunities, advising that access needs to be balanced with commute speed in order to maximize ridership of the potential transit solutions. Interest was piqued by the economic, commuter and recreational travel opportunities that streetcar could offer.

Community advisory committee

The Lake Oswego to Portland transit project community advisory committee provided “on the ground” input and guidance to project staff and the project steering committee on issues of importance to community members and other project stakeholders during the development of the DEIS and selection of a locally preferred alternative (LPA). The group will provide:

- ongoing input about issues that should be addressed in the DEIS
- input about potential stop locations and other design refinements
- input about the project’s LPA including transit mode and route
- input about community-supported remedies to potential community impacts as a result of the LPA.

CAC members include a mix of residential, business and advocacy group members who met between October 2009 and February 2011. Several members selected an alternate to regularly represent them at any CAC
meeting they were not able to attend personally. Their meetings included presentations of project information and time for questions and discussion. As appropriate, project staff followed up with individual members on question or concerns throughout the process.

A significant number of non-members attended each CAC meeting, with several attending almost all of them and some people attending periodically when they had time. Reporters, most significantly one from the Lake Oswego Review, also attended CAC meetings frequently and wrote news stories about the meetings.

Discussion from CAC meetings informed the project team of specific local issues and concerns as they drafted the DEIS and identified items for further study. These items for future study were included as part of their recommendation to the project Steering Committee on a locally preferred alternative. They expressed a preference for streetcar to advance for further study, rather than enhanced bus or no-build, identified streetcar design options that should advance and also cataloged ideas on station locations, pedestrian improvements and park and ride facilities that will be studied more as the project advances.

COMMUNITY GROUP OUTREACH

Beginning in fall 2009 and ongoing, the project team has met with community groups and business associations, providing an overview of the project purpose and need, alternatives, Draft Environmental Impact Statement/National Environmental Policy Act process, project timeline and the locally preferred alternative decision making process. As more information became available through the DEIS study, results were shared as appropriate to the geographical location and/or interests of the groups. Questions and comments from these presentations informed the DEIS analysis and content.

The full list of community groups is as follows:

**November 2009**
- Clackamas County Business Alliance

**February 2010**
- Lake Oswego Neighborhood Action Coalition
- South Waterfront Community Association
- Southwest Neighborhoods Inc.

**March 2010**
- South Portland Business Association
- South Portland Business Association Merchant Fair
- Old Town Evergreen and Lakewood Neighborhood Associations, Lake Oswego

**April 2010**
- Lake Oswego Rotary Club

**May 2010**
- Remax real estate agents, Kruse Way office
- Lake Oswego Adult Community Center (two sessions)
- Lake Oswego City Council (tour)
- Southwest Neighborhoods Inc. Transportation Committee
- Lake Oswego Women’s Coalition
- Lake Oswego city staff (tour)
- Travel Portland
- Adult Community Center
July 2010
- Lake Oswego event: Thirst Quencher Thursday, materials at three events
- Lake Oswego event: Millenium Concert Band, materials only
- Elders in Action Board
- Lake Oswego event: Sounds of Summer Concert, materials at four events
- Lake Oswego event: Lake O farmers' market, information booth at two events
- Lake Oswego Centennial Festival, information booth

October 2010
- Birdshill Community Planning Organization
- South Portland Neighborhood Association
- Portland Business Alliance Transportation Committee (second visit)
- South Portland Business Association (second visit)
- Old Town Evergreen and Lakewood Neighborhood Associations, Lake Oswego (second visit)
- Portland State University Farmer's Market, information booth
- Portland Planning and Sustainability Commission

November 2010
- North Macadam Urban Renewal Advisory Committee
- Clackamas County Business Alliance, materials only

December 2010
- Lake Oswego Lions Club
- Portland Freight Committee (second visit)
- Portland Bicycle Advisory Committee
- Lake Oswego Rotary
- Lake Oswego City Council work session (second visit)
- Portland Pedestrian Advisory Committee
- Lake Oswego Chamber Board (second visit)
- Stampher Road Homeowner's Association
- North Macadam Urban Renewal Advisory Committee (second visit)

January 2011
- West Linn Transportation and Sustainability Advisory Boards and Neighborhood Chairs
- Old Town, Evergreen, Lakewood Neighborhood Associations and Birdshill Community Planning Organization
- Portland Freight Committee members meeting (third visit)
ENVIRONMENTAL JUSTICE OUTREACH

Sensitive populations identified in this corridor through the 2000 U.S. Census include people age 65 and older, people with low income and minorities. The project has targeted these populations through specific outreach, including:

- inclusion of a nine representatives on the 23-person CAC that are over 65
- direct mailing to residents in South Portland specifically reached low-income persons
- community group briefings to existing neighborhood associations and other organizations with a majority of senior members (Lake Oswego Adult Community Center and Elders in Action Board, Lake Oswego Women’s Coalition)
- ensuring ADA-accessibility at all public meetings and events.

To further reach out to people with low-incomes, elderly and minorities, the project:

- canvassed door-to-door in the Collins View and Evergreen neighborhoods
- published information through elementary school newsletters to reach parents of low-income and minority children (SW Charter School, Portland French School, Riverdale Grade School, Forest Hills Elementary School, Our Lady of the Lake School, Metropolitan Learning Center, Cathedral School, Emerson School, Pacific Northwest College of Art, PSU, St. Mary’s Academy, Northwest Academy, International School, Greenhouse Alternatives High School, Lewis and Clark, OHSU)
- hosted an information booth at the Zupan’s grocery store in Johns Landing
- provided information in newsletters, on web sites for bulletin boards (Meals on Wheels, Jewish Federation of Greater Portland, Multnomah County Central Library, Ride Connection).

PUBLIC COMMENT PERIOD, OPEN HOUSES AND PUBLIC HEARING

The public comment period began Dec. 3, 2010 and concluded on Jan. 31, 2011. During that time, the project hosted two open houses in December, one in South Portland and one in Lake Oswego, to:

- present the background, Purpose and Need, and timeline of the DEIS
- share the alternatives analyzed and the findings from the DEIS
- provide an opportunity for residents to talk with the project team and provide comments on the DEIS.

The public hearing was held on January 24, 2011 in Lake Oswego. Seventy-nine people testified before the project steering committee.

The comment period, open houses and public hearing were advertised on the project web page (on Metro’s website) and through newspaper ads, emails to interested parties, information passed out during community group briefings and public meetings and a post card mailed to property owners and interested parties throughout the corridor.

In addition, notices were provided to several blogs: Portland Transport, Bicycle Transportation Alliance, Bike...
Several area newspapers carried stories about the DEIS release and comment period, including information about how and where to send comments or how to participate in open houses or the public hearing.

Comments received throughout the public comment period, at open houses and at the public hearing are summarized in the following section.

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**PROJECT WEBSITE**

During the public comment period of Dec. 3, 2010, to Jan. 31, 2011, the project website, www.oregonmetro.gov/lakeoswego, was visited 2,192 times by 1,583 unique visitors.

The project website presented the Draft Environmental Impact Statement in full and by chapter. Visitors were also able to access supporting documentation, including technical reports and plan sets.

The site advertised the open houses and public hearing and informed the public on how to comment on the document, including the online comment form, by email, by post or at the public hearing.

The site also notified the public of upcoming meetings of the community advisory and steering committees, presenting meeting materials and summaries of past meetings. Current and previous newsletters and fact sheets were also accessible on the site, summarizing the project, process, alternatives, and the benefits and trade-offs presented in the Draft Environmental Impact statement.
Including public testimony at the hearing, 454 comments were received during the public comment period of Dec. 3, 2010, to Jan. 31, 2011.

In order to fairly include those residents who wished to participate, the 17 comments that were received within three days before (nine comments) and after (eight comments) were also accepted as part of this public comment report.


Comments have been tallied to provide a sense of their content and sentiment, but the public comment process was not designed as a vote or scientific survey, nor should it be interpreted as such.

THE NEED FOR COMMUNITY INVESTMENT

A key tradeoff expressed in the comments dealt with the question of whether transportation investment is needed in the corridor connecting Lake Oswego and Portland.

253 comments called for transportation investment, expressing that Highway 43 is not sustainable in its current form and highlighting the importance of transportation connections in sustaining a vibrant community. Most of these comments expressed a need for transit improvements, typically focusing support for one of the build alternatives presented in the Draft Environmental Impact Statement. Several included a call for improvements for bicycle users such as a dedicated trail or bike lanes added to Highway 43.

141 comments stated that there is no need for transportation investment in the corridor, often stating that congestion is not that bad or, in contrast, any changes would add to the congestion through Lake Oswego that is already bad. Another theme of these comments referred to the current economic conditions of the nation, state and Lake Oswego, often referring to the need for school funding over other types of investment.

Nine comments acknowledged a need for transit investment, but in consideration of current economic conditions stated that now is not the time for such investments to take place.

Sixty-eight comments, including six from state and federal agencies did not clearly address the issue of whether transportation investment is needed in the corridor.

“Bus service is not sufficient as it is... As our population inevitably grows, the buses will be further strained... I hope to grow old in Lake Oswego but the availability of transportation is concern.”
– Anne Woodbury, Lake Oswego

“Oregon as a whole is struggling, and I think allocating the money to schools and investing in the future of Oregon (school aged children) would be a far better option.”
– Marie Spada, Lake Oswego
SUMMARY OF PUBLIC HEARING TESTIMONY

Seventy-nine people testified to the Lake Oswego to Portland Transit Project Steering Committee on Jan. 24, 2011.

For this summary, comments are categorized by their support for or opposition to one or more of the project alternatives: streetcar, enhanced bus or no-build, with language of support for one of the alternatives taking priority.

Comments supportive of one of the alternatives

Streetcar  Thirty-one testimonies supported the streetcar alternative. The main focus of these comments addressed the need for better transportation options connecting Lake Oswego with downtown Portland and the employment center of OHSU. Several comments addressed the benefits of streetcar in sustaining a thriving community in Lake Oswego, reducing greenhouse gas emissions and reliance on foreign oil, and facilitating development that would meet the needs of aging residents as well as younger families. These residents also highlighted the ownership of the Willamette Shore Line right of way that could be used to increase travel capacity in the corridor as well as for a significant portion of the local match.

Enhanced bus  Four testimonies supported the enhanced bus alternative. These residents saw this as the most economical alternative that could meet commuter needs.

No-build  Eight testimonies advocated the no-build alternative, stating that new transit investment not a priority in the corridor.

Comments opposed to one of the alternatives

Streetcar  Twenty-two testimonies opposed the streetcar without expressing a preferred alternative. The majority of these comments cited the cost of the streetcar alternative, often stating that, as taxpayers, they were unwilling to pay for the streetcar with federal or local funds. Many stated that the projected reduction of cars from Highway 43 during peak hours did not justify the expense, and others said that Lake Oswego residents would not substantially use the streetcar. Some residents expressed that the streetcar would change the community of Lake Oswego for the worse, a few stating that the streetcar would encourage unwanted development while others stating that it would not encourage development.

Enhanced bus  No comments expressed an opposition to the enhanced bus alternative without offering a preferred alternative.

No-build  Two testimonies addressed the need for the project without specifying an alternative preference, citing the need for a reliable public transportation system and the need to reduce dependence on foreign oil.

Comments without an expression of alternative preference or opposition

Ten testimonies addressed other issues without stating a preference for or opposition against any of the alternatives. Some of these comments addressed streetcar design options, and others spoke to concerns with the process of or information in the Draft Environmental Impact Statement.
Comments addressing design options for the streetcar alternative

Four comments specifically addressed a preference for or against one or more of the streetcar design options. Not all of these comments supported the streetcar alternative generally, nor were they counted as such.

One resident stated that the full value of the right of way should be utilized, preferring the Willamette Shore Line options through Dunthorpe/Riverdale and Johns Landing. One resident stated that the Riverwood Road design option in Riverdale/Dunthorpe should not be selected due to the impact on that street. Two Johns Landing residents testified in support of streetcar on Macadam Avenue through that area to support businesses and eastside users while avoiding impacts to properties along the Willamette Shore Line.

SUMMARY OF WRITTEN COMMENTS

Metro received 375 comments during the 60-day public comment period. Comments that were received within three days before (nine comments) and after (eight comments) were also accepted as part of this public comment report, bringing the total accepted written comments to 392. The 17 comments were aligned generally with the alternative preferences expressed during the public comment period.

The majority of written comments were from individuals, largely residents living in the Lake Oswego to Portland transportation corridor or within Lake Oswego. Businesses submitted 10 comments, community organizations submitted 15, and public agencies submitted six comments.

For this summary, comments are categorized by their support for or opposition to one or more of the project alternatives: streetcar, enhanced bus or no-build, with language of support for one of the alternatives taking priority.

Comments supportive of one of the alternatives

Streetcar 147 comments stated support for the streetcar alternative. Many comments preferred the streetcar as clean, reliable transportation option in the corridor, stating that the streetcar would add capacity in a corridor that is currently often congested.

Comments in favor of the streetcar emphasized the transit travel time savings, improvement on greenhouse gas emissions and lower operations cost of streetcar. A number of comments underscored the advantage provided by the Willamette Shore Line right of way as both an existing public resource for a transit alignment and the opportunity to use its value as to help meet local funding.

Residents of both Lake Oswego and Johns Landing saw the streetcar as offering the best benefit to businesses and community vibrancy.

Several comments highlighted support for the redevelopment potential of Foothills, seeing the streetcar as the most supportive of an area that could offer living options for younger families and older residents of Lake Oswego who want to age in place.

“As a senior who has decided to age in place, I am delighted to hear that the streetcar may be heading to Lake Oswego... Streetcars are safe and affordable and will help with the aging process to be more mobile outside of our city.”

– Marcia
Robertson, Lake Oswego

“[T]he longer we use the street car the greater reduction of subsidies that are required by TriMet to support it. Just the opposite is true for the enhanced bus option...

[It is clear that expanding Highway 43 is not an option. Enhanced busses are competing for the same space. However the streetcar rail line adds capacity that is already there.”

– Duncan Castle, Lake Oswego
Many comments spoke simple support for the streetcar without giving the commenters’ rational.

**Enhanced bus** Forty-five comments supported the enhanced bus alternative. These comments focused on the flexibility of buses to change routes and schedules. Residents also stated that the enhanced bus is the less expensive build alternative, which is an important consideration in the current economic climate. Several comments highlighted that the enhanced bus would create few changes to the lives of residents along the alignment and would fit with the atmosphere of Lake Oswego.

Several of the comments in support of the enhanced bus option included additional recommendations to meet transportation needs such as building a multi-use path along the Willamette Shore Line right of way, increasing transit service on Terwilliger Boulevard and Boones Ferry and Taylors Ferry roads, and building a MAX extension from Milwaukie, either on a new bridge or on the Portland and Western Railroad bridge.

**No-build** Fifty-six comments advocated the no-build alternative or stated opposition for the project generally without specifying opposition to a specific build alternative. Residents stated that transit investment was not needed or wanted, and that a transit project would not be used enough to justify the spending needed to implement it. Some commenters referred to their observations that the current local bus service to and from Lake Oswego is currently underutilized or that the traffic on Highway 43 is manageable. A few questioned the policy of investing in transit improvements that would benefit a primarily more affluent community.

Several Lake Oswego commenters stated that a transit project would encourage development that they did not want.

As with those comments supportive of the enhanced bus, several of the comments supportive of the no-build alternative included recommendations to meet current and future transportation needs. These recommendations included creating reversible lanes on Highway 43, building an east-west rail line across the Willamette River through Lake Oswego – possibly tunneled – creating a multi-use path using the Willamette Shore Line right of way, and building a bypass route for Highway 43.

**Comments opposed to one of the alternatives**

**Streetcar** Ninety-five comments opposed the streetcar alternative without addressing a preferred alternative.

Commenters opposed to the streetcar stated that the cost of the streetcar alternative is unacceptable, often stating that the current economy should retard spending of federal money and local money should be focused on schools or to meet other commitments. Other comments highlighted the streetcar’s potential impact to wildlife, floodplains and parks, saying the environmental cost is too high.

Several comments stated that there is no need for the streetcar, some stating that Highway 43 congestion is manageable. Some commenters contested the ridership and traffic projections presented in the Draft Environmental Impact Statement, stating that the numbers were implausible based on their assessment of developable land in Lake Oswego, their perceptions of their neighbors’ likelihood of using transit or their belief that the projections relied on a high density development of Foothills.

Some comments expressed opposition to development of Foothills, seeing streetcar as a first step toward that development.
A few comments lamented that the debate for or against streetcar was causing strife between Lake Oswego residents.

Many comments spoke simple opposition to the streetcar without giving the commenters’ rational.

Enhanced bus No comments expressed an opposition to the enhanced bus alternative without offering a preferred alternative.

No-build Eight comments spoke to the need for the project without specifying an alternative preference. Most of these comments referred to the importance of the project to meet transportation needs, citing the benefits of convenience, reduced greenhouse gas emissions and increased access between Lake Oswego and Portland.

Comments without an expression of alternative preference or opposition

Forty-one comments addressed other issues without stating a preference for or opposition against any of the alternatives. These comments included those from state and federal agencies that did not take a position on a preferred alternative. Several of these comments contested the figures, findings or process of the Draft Environmental Impact Statement. Some stated inquiries or requests to be addressed as one of the alternatives moves forward.

Comments addressing design options for the streetcar alternative

Fifty-seven comments addressed a preference or opposition for one or more of the streetcar design options. Not all of these comments supported the streetcar alternative generally, nor were they counted as such.

Lake Oswego No comment expressed specific preference for either the Foothills or Union Pacific Railroad right of way design option.

Dunthorpe/Riverdale Twenty-three comments supported the Willamette Shore Line design option. The majority of these stated that it was the most fiscally responsible since it used the value of the right of way. A few mentioned that it would prevent the closure of the Riverwood Road/Highway 43 intersection and would preserve the feel of Riverwood Road.

Seven comments favored the Riverwood Road design option, citing impacts to residential property with the Willamette Shore Line design option.

Johns Landing Twenty-seven comments supported the Willamette Shore Line design option. Commenters stated that it was the most fiscally responsible since it used the value of the right of way, offered the best travel time, would not affect traffic on Macadam Avenue and would not divide Heron Pointe Condominium property.

Sixteen comments preferred that the streetcar be routed to Macadam Avenue. Commenters stated streetcar on Macadam Avenue would most benefit business along and riders east of the highway, would avoid impacts to properties along the Willamette Shore Line and would offer the opportunity to convert the right of way to a multi-use trail through that segment. Four of these comments specified a preference for the Macadam in-street design option. No comments specified the Macadam additional lane design option.

“I see this... being a knife that will cut through the community separating the working folks using the line and the homeowners who are opposed to it because of their very expensive homesite values being impacted.”
– Joan Call, Lake Oswego

“The option of having the streetcar on portions of Macadam would have traffic calming effects and would be more resident useful. We also support stops on the North, central and South end for the benefit of residents, commuters and shoppers.”
– Naseco Macadam Market, Portland, Johns Landing neighborhood
ISSUES RAISED BY COMMENTS

Commenters indicated issues to be resolved if either the streetcar or enhanced bus moves forward to the next phase of project planning. In adhering to the requirements of the National Environmental Policy Act, the project will respond to the issues raised in the Final Environmental Impact Statement if one of these alternatives is selected as the Locally Preferred Alternative.

Community effects

Noise and vibration Comments from those with property along the alignment for the streetcar alternative requested details and assurance about mitigation measures for noise and vibration.

Streetcar crossings In neighborhoods along the alignment residents requested details on how the project would ensure safe crossings for the streetcar alternative without degrading auto access to neighborhoods or parking, especially during construction.

Historic resources A few comments stated the importance of preserving the three buildings designed by Lake Oswego architect Richard Sundeleaf, a couple suggesting that the terminus should be sited in Foothills to avoid any impact to the properties.

Equity A few comments addressed equity, approaching it from different angles. A few stated that the project will primarily serve an affluent community. On the other hand, others stated that those that would use it, especially transit dependant riders, would not be paying their fair share.

Acquisitions and displacements Two businesses that may be affected by the streetcar alternative stated that displacements are unacceptable. Other comments stated that loss of parking to businesses, apartments and condominiums in Johns Landing and Lake Oswego under the streetcar alternative should be minimized.

Finance

Federal funding As stated above, several comments stated that federal funds should not be used to invest in the corridor given the current state of the economy. Others questioned the likelihood of the 60 percent federal funding level outlined by the finance plan, asking what the contingency is if the federal portion is less.

Local funding Residents asked for more detail on how the local funds would be raised, several stating that they were unwilling have taxes raised to pay for the project, especially in light of other local funding commitments or cutbacks. Some that presumed redevelopment opportunities under the streetcar alternative suggested that the funds could or should be raised as part of redevelopment projects.

Operations and maintenance Although most comments regarding operations and maintenance costs highlighted the annual savings of the streetcar alternative, a few comments contested the figures on the premise that streetcar riders would be less likely to pay their fare.

Value of the Willamette Shore Line right of way Many stated that the potential to use the value of the Willamette Shore Line right of way as part of the local match commitment is a unique opportunity that should not be missed. Several comments questioned the projected value of the right of way to be used as part of the local match requirement for the streetcar alternative, requiring more detail and confirmation of the appraisal process.

“One fourth of the cost [of the streetcar alternative] will be covered by a smart decision made 20 years ago to acquire the right of way. The federal government will contribute a major share, and the local areas all along the route benefited by the line will chip in to cover the cost.”

– Doug Cushing, Lake Oswego

“(The streetcar alternative] proposes spending nearly a half billion dollars to improve commute times by a few minutes on a route that already has less traffic congestion than many parts of the region, and will primarily serve one of the wealthiest and most racially segregated communities in the state.”

– Dowd Architecture, Portland, Johns Landing
The cost of doing nothing  Some comments felt that the long term cost of not investing should be better quantified, citing policy shifts to address carbon emissions, the economic threat created by peak oil, and the cost of roadway maintenance. A few others stated that waiting until the traffic problem is urgent would only increase the cost.

Land use and planning

Population forecast Some comments contested the population forecast for Lake Oswego, often stating that since the city is mostly built out, the numbers were unreliable.

Redevelopment  Several residents expressed enthusiasm for the potential housing options that would be encouraged by the streetcar alternatives in the Foothills district, especially for older residents looking to downsize while staying in Lake Oswego and for the opportunity to attract younger families to the city. In contrast, some commenters did not want to encourage redevelopment in Lake Oswego, stating that they wanted to protect the village feel of the city. Still others felt that the streetcar’s development advantages were not substantiated.

Natural environment

Greenhouse gas emissions Several comments stated the importance of the streetcar alternative’s benefit of reducing greenhouse gas emissions.

Ecosystems Several residents expressed concern for the impacts to habitats of wildlife and aquatic species that may be imposed by the streetcar alternative, with a few stating that the species audit was not thorough enough. A related concern was the potential of retaining walls impeding wildlife movement.

Hydrology A few comments mentioned apprehension for the level of Willamette River floodplain loss and wetland and waterway disturbance during construction under the streetcar alternative.

Earthquake and landslide risk Some comments questioned the wisdom of a rail line spanning the fault lines in the corridor. A few comments stated that construction of the streetcar alternative would increase landslide risk. Others asked for detail on the height of retaining walls that would be needed.

Public safety and security

Streetcar crossings As mentioned, residents from neighborhoods along the alignment requested details on how the project would ensure safe crossings.

Crime rates A few commenters stated their belief that the streetcar alternative would bring increased crime; however, a similar number proactively rebutted with their belief that this would not occur.

Transit security A few comments asked for details regarding the protocol for security for the streetcar alternative.

Section 4(f) preliminary findings of de minimus impacts to public parks

A few comments stated that the streetcar would impact parkland or traditional access to parks. One comment stated that in complying with Section 4(f) designation, the Draft Environmental Impact Analysis did not fully express the impact to lands that could one day be included in a parks master plan.

Transportation

Congestion Comments often contradicted each other, with several stating that traffic on Highway 43 is not

“People move and reside here because it is small, cozy and quiet. Most people prefer to have a single-family home with land. Condos and townhomes are only purchased by those who cannot afford much.”

– Michele Boulanger, Lake Oswego

“I currently live out in Wilsonville because there’s not very many options for 25-year-olds who are looking to move back to Lake Oswego. My family still lives on Radcliff Road... We really believe that putting a streetcar into Lake Oswego will help the businesses and communities and enhance our identity here. I fully support building a Foothills development for people my age to move back to Lake Oswego.”

– Meredith Scanlan, Wilsonville
“Public transportation helps reduce greenhouse gases, reduces wear and tear on roads, and the streetcar would be a more enjoyable alternative than taking the bus. The community owes it to future generations to build an infrastructure that allows those living in these already built-out suburban hubs to get to downtown.”

– Rosemary DiCandilo, Lake Oswego

“I truly feel not enough people will actually utilize this route to make it a worthwhile project for the amount of money that it is projected to cost.”

– Leslie Mahler, Clackamas County, Dunthorpe neighborhood

a problem or at least manageable and several others stating that current congestion is already a problem and will continue to worsen. Some expressed that a project that doesn't significantly reduce congestion should not move forward.

**Lake Oswego traffic** Several comments stated concern that the streetcar alternative would not alleviate or would exacerbate traffic through Lake Oswego on State Street/Highway 43, especially near the terminus at Oswego Village.

**Transit efficiency** Several comments stated the importance of the streetcar alternative’s travel time savings, carrying capacity and capacity.

**Transit flexibility** Several comments stated the importance of the enhanced bus or no-build alternatives’ flexibility to respond to demand or catastrophe with temporary or long-term route changes.

**Transit access** Several comments highlighted the need for an efficient transit connection to the MAX system. A few residents mentioned the need for better local service to connect to the streetcar or enhanced bus. There was a specific concern for senior and disabled persons access and the need for an additional transfer to the streetcar in order to connect to their destination. A couple of comments expressed concern that the park and ride facility would encourage auto traffic on North Shore Road and McVey Avenue.

**Park and ride facility** A few comments stated either that the park and ride structure would not fit with the feel of Lake Oswego or that it should be designed carefully to ensure that it does.

**Traffic south of Lake Oswego** Some comments stated that the root of the traffic problem comes from West Linn and Oregon City. A few comments stated that the enhanced bus or no-build alternatives would offer the best option for West Linn transit users, since they would not require a transfer.

**Trail** Thirty-three comments stated the need for a trail in the corridor, some stating that the safe, improved bicycle commuter access in the corridor is just as if not more important than improved transit access.

**Additional issues**

**Public involvement process** A few comments expressed disappointment with the public involvement process, feeling that there was not enough detail presented leading up to and during the public comment period and others saying that there was not enough opportunity to express themselves to decision-makers.

**Willamette Shore Line right of way** A few comments stated that the Willamette Shore Line ownership types and authority needs to be clearly documented. One owner stated its expectation that if abandoned for rail purposes, the right of way would revert or transfer to adjacent property owners rather than being used for a trail.

**Station siting** A few comments from Johns Landing stated the need for a station between Boundary and Carolina streets. Another stated the importance of a station to serve the Riverdale area. Comments were balanced on a Riverwood Road station under the streetcar alternative, with a few comments excited to have easy access to a station and a few stating that it would cause parking or crime issues in the area.
SPECIFIC COMMENTS FROM BUSINESSES

Comments from businesses contained specific issues and highlighted the need for continued coordination, which is typical as a project advances.

Dowd Architecture (Portland, Johns Landing neighborhood) Dowd Architecture opposes the streetcar alternative because of potential impacts to the business/residence property along the Willamette Shore Line right of way. Specific concerns include noise and vibration and zoning regulations that would prevent additional structures. Congestion is not a problem on Highway 43. The Draft Environmental Impact Statement does not adequately present impacts to the Miles Street/Place area, exaggerates the streetcar’s development advantage and underestimates the impacts of noise and vibration. The streetcar is socially inequitable because transit service is needed in areas that are more congested, are less wealthy and have a higher percentage of minorities.

Erickson’s Automotive (Lake Oswego, Foothills district) The country, state and counties are in financial trouble and cannot afford the streetcar alternative, and the enhanced bus will do just as much for the development of Foothills. The population projections in the Draft Environmental Impact Statement are inaccurate. The project will not optimize the regional transit system and does not serve historic and traffic needs. More detail is needed for those directly and indirectly impacted by the project. If the Willamette Shore Line right of way is abandoned for rail purposes, KDH expects the right of way to revert to property owners and not be used for a trail.

Naseco Macadam Market (Portland, Johns Landing neighborhood) The streetcar alternative is the better option for future development of the south Macadam Avenue area. For the benefit of residents, commuters and shoppers, there should be north end, central and south end stops in Johns Landing.

Oswego Lender, LLC (Lake Oswego, Foothills district) Oswego Lender, LLC supports the streetcar alternative, but requires consultation on several issues: Plans for access with the park and ride at Oswego Village show an impact to Oswego Point Apartments parking; the parking garage is a potential eyesore for residents; visibility and curb appeal of the apartments would be impacted by streetcar operations; and noise and vibration during construction and operation of the streetcar alternative would need to be mitigated to satisfaction.

Jennings Insurance Agency (Lake Oswego, downtown) Investment in the streetcar alternative will encourage good businesses and young families to move to the area. Efficient transit is necessary for employees to work in Lake Oswego.

KDH LLC (Clackamas County, Dunthorpe neighborhood) The Draft Environmental Impact Statement does not sufficiently address fundamental issues to move the project forward. The projections are inaccurate. The project will not optimize the regional transit system and does not serve historic and traffic needs. More detail is needed for those directly and indirectly impacted by the project. If the Willamette Shore Line right of way is abandoned for rail purposes, KDH expects the right of way to revert to property owners and not be used for a trail.

Oregon Public Broadcasting (Portland, Johns Landing neighborhood) The project could directly benefit OPB by providing transportation options for employees, volunteers and the community. Noise and vibration is a concern moving forward, especially with the planned streetcar stop at Nevada Street. OPB looks forward to continued consultation with the project team on this issue and to ensure safe access.

“[W]e look forward to working with the [p]roject team as the engineering and planning process moves forward.”
– Oregon Public Broadcasting, Portland, Johns Landing neighborhood

“The streetcar can do very little more in regards to developing the foothills area over what enhanced bus service can do.”
– Erickson’s Automotive, Lake Oswego

“I strongly believe that an investment in the [streetcar alternative] will encourage good business and young families to move to our area... something we are all looking for. A vibrant community that attracts good jobs and citizens.”
– Jennings Insurance Agency, Lake Oswego
Public Storage (Lake Oswego, Foothills district) Public Storage opposes the streetcar alternative, because it will displace Public Storage in Lake Oswego. Lake Oswego is an excellent market, and relocation within the area is not feasible. The funding plan overestimates the value of the Willamette Shore Line right of way and the federal match. The population projections in the Draft Environmental Impact Statement are inaccurate.

Terramar Retail Centers (Lake Oswego, Old Town neighborhood) Oswego Village is an appropriate terminus for the streetcar, offering the potential to facilitate redevelopment of the property. A parking management plan needs to be created between the agencies and Terramar to ensure that Oswego Village retailers and customers are not negatively affected. The City of Lake Oswego needs to adopt a zoning designation that allows phased redevelopment as streetcar ridership increases and facilitates the market for private economic development.

SPECIFIC COMMENTS FROM COMMUNITY ORGANIZATIONS

Several community organizations offered strong support for the streetcar alternative, while others seemed to support it but identified issues to be worked out with more advanced study. Several groups opposed the streetcar alternative, with two focusing on enhanced bus as a viable alternative. Finally, commenters offered optimism about the potential for a variety of housing stock in Lake Oswego and the need to protect historic structures.

Birdshill CPO/NA The Draft Environmental Impact Statement is flawed as it does not sufficiently address the issues of neighborhood residents, though this is primarily due to a lengthy Clackamas County and Lake Oswego neighborhood recognition process, which hindered delineation and representation of issues specific to Birdshill, and the preoccupation of residents with day to day necessities to engage elected officials. Unresolved are details regarding surface water management, the system of law enforcement and deterrence, interaction with bikeways and pedestrian movement, safety with respect to the Macadam Avenue in-street design option and how riders will react to transfers. Birdshill recommends a public vote as to result from the unanswered questions about computer models, code provisions and impacts to personal property and finances. Birdshill recommends a new alternatives analysis to include a new streetcar alignment: on Southwest Hood and Virginia avenues through Johns Landing, along Taylors Ferry and Boones Ferry roads, through a tunnel from the Greenwood Hill Cemetery to Tryon Creek State Park, along the bike path through Tryon Creek State Park, and onto First Avenue in Lake Oswego.

Cascade Policy Institute The Draft Environmental Impact Statement does not include all reasonable alternatives, and the enhanced bus is poorly conceived as an alternative. Analysis should have focused on current service augmented with morning and evening peak express bus service connecting Oregon City and Portland as the least-cost transit improvement option.
**Citizens for Stewardship of Lake Oswego Lands** If the project purpose is to be environmentally sensitive, the streetcar cannot be selected. The Draft Environmental Impact Statement lists alarming potential impacts to protected wildlife and fish habitats, species movement. There is concern that minimization and mitigation measures for potential impact to Oregon White Oak and stream channel alteration are not viable or would not be followed. There is concern that the analysis of parklands and recreation areas is incomplete due to the criteria for Section 4(f) compliance designation.

**Disability Services Advisory Council of Clackamas County** Access for seniors and people with disabilities would be impacted if there are changes to Line 35. If they need to transfer to the streetcar and then transfer again to get to their destination, it may become prohibitive.

**Fair Housing Council of Oregon** The project is required to complete a comprehensive equity analysis to examine whether the benefits and burdens of the Locally Preferred Alternative fall fairly on all affected communities. The Lake Oswego housing stock excludes even most moderate- and middle-income households, but has an opportunity to develop a more diverse housing stock with the development of Foothills.

**Lake Oswego Natural Resources Advisory Board** The streetcar is the cleaner, environmentally preferable alternative. If the streetcar is selected, the crossing of Tryon Creek must be designed to avoid negative impacts to fish and wildlife habitat.

**Lake Oswego Historic Resources Advisory Board** The historic building analysis in the Draft Environmental Impact Statement is incomplete. It did not consider two of the three buildings designed by Lake Oswego architect Richard Sundeleaf, all three of which should be preserved as part of the heritage of the city. Additionally, it is important that designs for the streetcar terminus at Oswego Village not disturb the character of the Old Town neighborhood.

**Portland Bicycle Advisory Committee** The project creates a critical link in the regional transit system. The BAC supports the streetcar alternative and the Macadam Avenue in-street design option, recommending that the designs support safe bicycle and pedestrian access and enhance neighborhoods. Unused portions of the Willamette Shore Line right of way should be considered for a multi-use path through Johns Landing, though the BAC also recommends bicycle access improvements to Macadam Avenue.

**Portland Pedestrian Advisory Committee** The PAC recommends the streetcar alternative and recommends that designs support pedestrian and bicycle access and enhance neighborhoods. The project should not preclude use of the Willamette Shore Line right of way for a multi-use path, particularly north of the Sellwood Bridge.

**South Portland Neighborhood Association** The SPNA supports the streetcar alternative and the Macadam Avenue in-street design option through Johns Landing. High quality transit in the corridor is fundamental to maintaining the region’s quality of life and providing effective and convenient connections.

“The DEIS makes the argument that the bus alternatives are more damaging to the ecosystems as they do not offer the opportunity to restore habitat, repair culverts, etc... [R]estoration projects could be funded and accomplished at any time independent of a transit project.”

– Citizens for Stewardship of Lake Oswego Lands

“[The South Portland Neighborhood Association] emphasizes the importance of this project’s physical improvements to the pedestrian environment along Macadam Avenue in the Johns Landing neighborhood, including wider sidewalks and more frequent pedestrian crosswalks.”

– South Portland Neighborhood Association
The URAC appreciates the project’s goals to improve transit connections to South Waterfront and supports extending the city’s existing streetcar system, leveraging past public and private investment in the system, and providing improved access into and out of the district.”

– North Macadam Urban Renewal Advisory Committee

“[The streetcar alternative] would provide the greatest improvement in opportunities for physical activity because of its higher level of service, greater improvements in park and trail accessibility, and provision of greater amounts of bicycle and pedestrian infrastructure in the corridor..”

– Oregon Public Health Institute

Stampher Road Home-Owners Association The streetcar alternative will have negative consequences for the neighborhood as it will cross the road into the neighborhood, requiring signals and warnings of an approaching streetcar. The Draft Environmental Impact Statement lists direct and indirect impacts to wildlife and fish but does not supply sufficient information regarding the other effects, including those of construction of the freight undercrossing, the Tryon Creek trestle and the catenary system.

Travel Portland With the scenic route along the Willamette River, the streetcar could become a visitor destination in itself, opening the southern section of the region as an attractive day-trip destination for visitors to Portland. The streetcar alternative connects major regional amenities and is in keeping with the region’s strong brand as a sustainability and transportation leader.

Willamette Shores Condominiums The Willamette Shore Line right of way design option through Johns Landing would negatively impact property values. The Board of Directors and owners support the Macadam Avenue in-street design option, which also affords the best redevelopment opportunity for the neighborhood.

Oregon Public Health Institute The streetcar alternative provides the greatest improvements in opportunities for physical activity, greatest reductions in future air pollutant levels, greatest improvement in access to health supportive services and greatest reduction in traffic crash rates. Recommendations for mitigation to reduce air pollutants during construction include working with the Department of Environmental Quality to develop emissions-based construction equipment fleet requirements, developing information and outreach programs to alert residents of construction schedules and educate them on how to avoid exposure to air toxics generated by construction, and developing monitoring programs to better assess construction site concentrations of air toxics.
SPECIFIC COMMENTS FROM PUBLIC AGENCIES

Public agencies offered comments on the alternatives without taking a position on them, rather highlighting areas that need additional analysis, clarification or coordination in Preliminary Engineering and the Final Environmental Impact Statement.

**Federal Highway Administration (FHWA)**

FHWA asked for details in the Draft Environmental Impact Statement to be clarified or addressed as the streetcar or enhanced bus alternative moves forward.

**Oregon Department of Transportation (ODOT)**

A storage facility under the Marquam Bridge for the streetcar alternative would require ongoing negotiation to accommodate competing demands for the space. If the state continues to maintain ownership of Highway 43, Macadam Avenue design options through Johns Landing will be subject to ODOT’s Highway Design Manual, require further research, analysis and development of bicycle and vehicle safety measures for installation on a state highway, and modernize the drainage and stormwater treatment facilities.

**Oregon Department of State Lands (DSL)**

There may be impacts to state waters, including wetlands. Compensatory mitigation concepts should be coordinated with appropriate agencies.

DSL also provided information on its permitting process.

**Oregon Water Resources Department (OWRD)**

No comments directly relating to the Draft Environmental Impact Statement, but OWRD requests contact before monitoring or other geotechnical holes related to the project are drilled.

OWRD also provided criteria and options for local jurisdictions regarding well abandonment.

**United States Department of Interior**

If the streetcar alternative moves forward, the Final Environmental Impact Statement should include specific information regarding the level and extent of the proposed mitigation to adverse impacts to fish and wildlife species and resources. Best management practices should be developed to avoid and minimize impacts to native trees, wildlife and aquatic species.

Compensatory mitigation should concentrate on areas that provide the best benefit.

**United States Environmental Protection Agency Region 10**

Based on potential impacts to aquatic resources, the enhanced bus alternative would be considered the Least Environmentally Damaging Practicable Alternative, but the streetcar alternative may be environmentally preferred overall and could be considered the LEDPA with compensatory mitigation. The Willamette Shore Line design option is preferred in Johns Landing and the Union Pacific Railroad right of way design option in Lake Oswego. Once the Locally Preferred Alternative is selected, more detail and commitment will need to be provided in the Final Environmental Impact Statement regarding mitigation measures for impacts to hydrology, water quality, floodplains and transit access as well as construction impacts.

“We support the project purpose to provide enhanced transit in the project corridor. Ultimately the decision regarding selection of an alternative and potentially of design options will be locally based. We encourage that the selected alternative be designed to achieve maximum benefits to the environment and the local community.”

—United Stated Environmental Protection Agency

Lake Oswego to Portland Transit Project Draft Environmental Impact Statement public comment report