

7. DRAFT EIS COMMENT SUMMARY

This chapter summarizes the comments received during the public comment period for the Southwest Corridor Draft Environmental Impact Statement (EIS) and how they have been taken into account in this Final EIS.

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Chapter 6, Public Involvement, Agency Coordination and Required Permits, describes the outreach activities associated with the Draft EIS comment period. Substantive issues raised in the Draft EIS comments are addressed in Appendix J, Draft EIS Comments and Responses. The Draft EIS comments were also summarized for project decision-makers in 2018 in the *Summary of Public Input on Route Selection for Southwest Corridor Light Rail (Metro)*.

7.1. Overview of Draft EIS Comments

On June 7, 2018, Metro notified its interested parties email list of the availability of the Draft EIS and the opportunity to submit comments. The 45-day comment period began when a Notice of Availability was issued in the Federal Register on June 15, 2018. The comment period closed on July 30, 2018. All comments received between June 7 and July 30, 2018, are included as Draft EIS comments within this Final EIS.

The project team received a total of 1,412 Draft EIS comments.¹ The comments include mailed letters, phone messages, online form submissions, emails and associated attachments, comment cards filled out at public events and spoken testimony at public hearings. Comments were submitted by individuals, businesses, organizations, public agencies and one tribe. Some commenters provided multiple comment submissions, and many commenters raised multiple distinct issues within a single comment submission.

7.2. Tribe and Agency Comments

In total, 348 comments were submitted by one tribe and 16 public agencies, as summarized below.

The **Confederated Tribes of the Grand Ronde Community of Oregon** noted potential project impacts to tribal resources, such as disturbance/destruction of archaeological resources, degradation of water quality, loss/fragmentation of habitats, disruption/alteration of hydrology, and permanent alteration of tribal cultural lands, and invited Metro, the Tri-County Metropolitan Transportation District of Oregon (TriMet) and the Federal Transit Administration (FTA) to meet for government-to-government consultation.

The **National Park Service (NPS)** provided comments related to potential Land and Water Conservation Fund (LWCF) conversion and the associated discussion in the Draft EIS. NPS acknowledged that it was not yet known at the time whether the Project would require LWCF conversion, and provided specific suggestions for edits to the language describing the LWCF requirements. For more information on LWCF

¹ In most cases, each submission has been recorded as one comment for the purpose of this tally. However, for spreadsheets submitted by public agencies, each row in the spreadsheet is counted as a single comment, because many of these comments were provided by separate individuals representing various departments or bureaus within each agency. Three of the submissions included petitions, which were each counted as one comment, although the number of signatories for each petition is noted within this Final EIS (see Section 7.3, General Public Comments).

conversion, including subsequent correspondence with NPS, see Appendix N, Section 6(f) of the Land and Water Conservation Fund Act Documentation.

The **United States Department of the Interior** had no comments specifically on the Draft EIS but did summarize ongoing coordination with FTA, through the NPS, related to potential impacts to a portion of Terwilliger Parkway that is a LWCF site.

The **United States Environmental Protection Agency** (USEPA) expressed support for the Project, and expressed concerns related to floodplain impacts and the location of the proposed operations and maintenance (O&M) facility. USEPA also encouraged further minimization of impacts and additional mitigation measures related to tree removal, streams, wetlands, park lands and community gardens, as well as reduction of stormwater runoff and a construction mitigation plan for diesel emissions.

The **Oregon Department of Transportation** (ODOT) provided a letter summarizing its feedback on the Draft EIS, as well as an appendix with specific detailed comments. Comments centered on the travel forecast year, jurisdictional transfers of SW Barbur Boulevard and SW Naito Parkway, the light rail alignment at the SW Barbur Boulevard trestle bridges, the Interstate 5 (I-5) and Pacific Highway (99W) planning envelopes, queuing at I-5 ramps and the Ross Island Bridgehead Reconfiguration. ODOT also commented on aspects of the Draft EIS traffic analysis, including model calibrations, the No-Build Alternative assumptions and queuing impacts.

Clean Water Services, a water resources management utility in Washington County, provided comments on vegetated corridors, fish habitat, wetland buffers, stormwater treatment and floodplains.

The **City of Lake Oswego** provided comments on Alternatives C3 and C4, and raised concerns about potential traffic impacts and spillover parking in Lake Oswego, as well as bicycle and pedestrian station access for the Bonita and Upper Boones Ferry Stations.

The **City of Portland** provided comments from multiple bureaus, as summarized below:

- The **Bureau of Development Services** commented on acquisitions, displacements and relocations, including impacts to historic resources; local land use plans; physical and visual impacts to Terwilliger Parkway; impacts to environmental overlay zones; application of the city's tree code; and impacts to air quality.
- The **Bureau of Environmental Services** provided comments on the water resources analysis. Most comments were minor technical questions; one comment addressed a desire for further analysis of cumulative impacts.
- The **Bureau of Planning and Sustainability** commented on the environmental justice and air quality analyses, local land use plans, data sources for natural resource information, indirect impacts and affordable housing in the corridor.
- The **Bureau of Transportation** submitted comments related to local access and circulation changes, traffic volumes, transportation analysis assumptions, access to the Oregon Health & Science University and the Portland Community College (PCC) Sylvania campus, station access improvements and pedestrian crossing design.

- The **Housing Bureau** submitted comments related to acquisitions, displacements, surplus property, the economic analysis, indirect economic impacts and the environmental justice analysis.
- **Parks and Recreation** commented on impacts to Terwilliger Parkway related to the Marquam Hill Connection, including visual, stormwater and ecosystem impacts, as well as Section 4(f) and Section 6(f) analyses, tree impacts, impacts to community gardens and the Woods Memorial Natural Area, and a desire for the EIS to address increased park access deficiencies resulting from increased housing along the corridor.
- The **Water Bureau** requested clarifications about references in the Draft EIS related to impacted underground pipes and water mains.

The **City of Tigard** provided comments on the traffic analysis, particularly related to the at-grade crossings at SW Upper Boones Ferry Road and SW 72nd Avenue, and the proposed park and rides at the 68th and Bridgeport Stations. Additional comments addressed the land use, economic, visual quality, ecosystems and communities analyses; station access improvements; pedestrian and vehicular safety concerns; jurisdictional transfers; acquisitions and displacements; park and ride development; project mitigations; impacts to property tax revenues; design refinements; affordable housing; and consistency with local plans. The city additionally suggested a number of technical changes and corrections.

Tualatin Valley Fire & Rescue commented to clarify references to their facilities in the Draft EIS and to request further coordination with TriMet and other agencies regarding transit preemption and construction safety plans.

Washington County primarily commented on the transportation analysis. Comments covered traffic modeling assumptions, tools and results; queuing analysis and spillbacks; park and ride traffic; traffic in the Bridgeport area; evolving technologies; mitigation measures; and a desire to analyze grade-separated crossings at SW Hall Boulevard, SW 72nd Avenue and SW Upper Boones Ferry Road. Washington County also requested additional information on existing and forecasted employment and population within the economics analysis, and suggested a number of technical changes and corrections.

7.3. General Public Comments

The comments received from the general public are grouped as comments from organizations, businesses and individuals. A total of 67 comments were submitted by 31 organizations and 20 businesses, which are listed in Table 7.3-1. Individual members of the public submitted a total of 994 comments (listed in Appendix J). In addition, 1,855 signatures were collected for a petition circulated by the owners of the Village Inn restaurant in Bridgeport Village, 73 signatures were collected for a petition circulated by the nonprofit organization Unite Oregon, and 259 signatures were collected for a petition in opposition to Refinement 4 that was circulated by Tigard business owners on paper and on Change.org (see Appendix E of the Draft EIS, Potential Design Refinement Concepts and Options, for a description of Refinement 4). The sections below summarize the common themes expressed in comments from the general public.

Table 7.3-1. Organizations and Businesses that Submitted Draft EIS Comments

Organizations	Businesses
<ul style="list-style-type: none"> · Ashcreek Neighborhood Association · Cascade Policy Institute · Coalition for SW MAX Railroad Options · Crestwood Neighborhood Association · DoCoMoMo Oregon · Friends of Terwilliger · HAKI Community Organization & Community Alliance of Tenants · Hillsdale Business and Professional Association · Hillsdale Neighborhood Association · Homestead Neighborhood Association · Multnomah Neighborhood Association · National University of Natural Medicine · OPAL Environmental Justice Oregon · Oregon and Southern Idaho District Council of Laborers · Oregon Health & Science University, Portland State University and Portland Community College · Oregon Walks · Portland Bicycle Advisory Committee · Portland Business Alliance · Portland Freight Committee · Portland Historic Landmarks Commission · Portland Pedestrian Advisory Committee Members · Portland Planning and Sustainability Commission · Restore Oregon · South Portland Neighborhood Association · Southwest Neighborhoods, Inc. · SW Trails PDX · Tigard Chamber of Commerce · Tigard Town Center Advisory Commission · Tualatin Aging Task Force · Tualatin Chamber of Commerce · Urban Design Panel 	<ul style="list-style-type: none"> · Ascend Holdings · Ash Court Apartments · Atiyeh Bros · Chick Fil-A, Chang’s Mongolian Grill, Lu’s Sports Bar & Lounge and Quality Inn · CJH LLC · Digital One · Girl Scouts of Oregon · James L. Shook, CPA · La Noue Development · Les Schwab · Oregon Education Association · Paul Schatz Home Furnishings · Stahancyk, Kent & Hook P.C. · Summit Properties, Inc. · T. Scandia Motors · The Portland Clinic · Unspecified (Nishi-Strattner) · Village Inn · Way W. Lee General Contractor, Inc. · Winterbloom Inc.

Light Rail and the Draft EIS Alignment Alternatives

Some commenters expressed general support for or opposition to either the initial route proposal or light rail in general. (See Chapter 2, Alternatives Considered, of the Draft EIS for more information about the initial route proposal, which was a draft preferred alternative identified by project partner staff in the Draft EIS.) Approximately 75 percent of these comments were in support, while about 25 percent were in opposition.

Some commenters expressed more detailed support for or opposition to certain light rail alignments studied in the Draft EIS. Table 7.3-2 summarizes the common comments received related to each alignment alternative, as well as the Ross Island Bridgehead Reconfiguration. (For maps and descriptions of these alignments, see Chapter 2 of the Draft EIS.)

Table 7.3-2. Common Comments on the Draft EIS Alignment Alternatives from the General Public

Summary of Alignment Support/Opposition and Associated Reasons
Segment A: Inner Portland
<p>Barbur Alignment (Alternative A1): supported by 71 commenters, opposed by 0 commenters</p> <ul style="list-style-type: none"> Reasons for support: fewer property impacts; no property impacts to NUNM; fewer historic impacts; better access to Marquam Hill
<p>Naito Alignment (Alternatives A2-BH and A2-LA): supported by 15 commenters, opposed by 0 commenters</p> <ul style="list-style-type: none"> Reasons for support: fewer property impacts on SW Barbur Blvd.; service to existing light rail station on SW Lincoln St.; better access to South Waterfront and NUNM
<p>Ross Island Bridgehead Reconfiguration (without expressing an alignment preference): supported by 62 commenters, opposed by 0 commenters</p> <ul style="list-style-type: none"> Reasons for support: improvements to neighborhood connectivity across SW Naito Pkwy.; safer access to the SW Gibbs St. pedestrian bridge over I-5; possible improvements to traffic on the approaches to the Ross Island Bridge; better bridge access from I-5 northbound; potential for less neighborhood traffic, particularly on SW Whitaker St. and SW Kelly Ave.
Segment B: Outer Portland
<p>Barbur Alignment (Alternative B1 and portions of Alternatives B2, B3 and B4): supported by 41 commenters, opposed by 18 commenters</p> <ul style="list-style-type: none"> Reasons for support: closer to where people live; better access from adjacent communities; desire for reconstruction of the Crossroads intersection (Alternative B1 only); would avoid specific property impacts; more visible station areas; faster travel times; potential for more ridership; would provide streetscape improvements to SW Barbur Blvd. (sidewalks, bicycle lanes and street trees) Reasons for opposition: perception that light rail on SW Barbur Blvd. would reduce capacity for vehicles; traffic impacts; impacts to adjacent properties; slower travel times
<p>I-5 Alignment (portions of Alternatives B2, B3 and B4): supported by 29 commenters, opposed by 2 commenters</p> <ul style="list-style-type: none"> Reasons for support: desire to avoid negative impacts to the Crossroads intersection or adjacent intersections; fewer impacts to adjacent neighborhoods and residences Reasons for opposition: too far from residences; would reduce transit access directly to destinations on SW Barbur Blvd.
Segment C: Tigard and Tualatin
<p>Through Route (Alternatives C1, C2, C3 and C4): supported by 4 commenters, opposed by 0 commenters</p> <ul style="list-style-type: none"> Reasons for support: more service for downtown Tigard; better connectivity to Tualatin and Bridgeport Village
<p>Branched Route (Alternatives C5 and C6): supported by 4 commenters, opposed by 0 commenters</p> <ul style="list-style-type: none"> Reasons for support: no specific reasons given
<p>Ash Alignment (Alternatives C1, C2 and C5): supported by 9 commenters, opposed by 1 commenter</p> <ul style="list-style-type: none"> Reasons for support: lower cost compared to Clinton Alignment; fewer property and business impacts; redevelopment opportunities; would avoid intersection of SW Beveland St. and SW 72nd Ave.; more direct connection to the Tigard TC Reasons for opposition: impacts to businesses and traffic on SW Beveland St.
<p>Clinton Alignment (Alternatives C3 and C4): supported by 7 commenters, opposed by 0 commenters</p> <ul style="list-style-type: none"> Reasons for support: fewer stations in Tigard Triangle; shorter travel time to Bridgeport Village; less traffic impact on SW 72nd Ave.; fewer property and business impacts on SW Beveland St.
<p>Wall Alignment (Alternative C6): supported by 1 commenter, opposed by 0 commenters</p> <ul style="list-style-type: none"> Reasons for support: perception of less impact on the community
<p>I-5 Alignment (Alternatives C1, C3, C5 and C6): supported by 1 commenter, opposed by 3 commenters</p> <ul style="list-style-type: none"> Reasons for support: closer to residences in Lake Oswego; more proposed parking at stations; closer to Kruse Way employment Reasons for opposition: traffic impacts; perception of property impacts on SW Bangy Rd.; perceived crime impacts
<p>Railroad Alignment (Alternatives C2 and C4): supported by 15 commenters, opposed by 0 commenters</p> <ul style="list-style-type: none"> Reasons for support: faster travel time; lower costs; more accessible to Tigard residents; fewer displacements; less business impact adjacent to I-5

Note: I-5 = Interstate 5; NUNM = National University of Natural Medicine; TC = Transit Center.

Design Refinements

Some comments were received about the design refinements, which were identified within the Draft EIS as potential changes to the alignment alternatives (see Appendix E of the Draft EIS for maps and descriptions). Some commenters expressed general concerns about the level of analysis the design refinements received relative to the alignment alternatives, and about the amount of time available for public comment on the

design refinements. Some commenters expressed support for or opposition to specific design refinements, as summarized in Table 7.3-3 by geographic segment.

Table 7.3-3. Common Comments on the Design Refinements from the General Public

Summary of Design Refinement Support/Opposition and Associated Reasons
Segment A: Inner Portland
<p>Refinement 1, Barbur Woods East-Side Running: supported by 7 commenters, opposed by 8 commenters</p> <ul style="list-style-type: none"> Reasons for support: would not require reconstructing SW Capitol Hwy. flyover; would provide new bicycle and pedestrian facilities adjacent to existing SW Barbur Blvd. trestle bridges Reasons for opposition: could impact traffic flow due to new at-grade crossings; would not replace existing SW Barbur Blvd. trestle bridges (not seismically resilient)
Segment B: Outer Portland
<p>Refinement 2, Taylors Ferry I-5 Overcrossing: supported by 4 commenters, opposed by 63 commenters</p> <ul style="list-style-type: none"> Reasons for support: reduced impacts to SW Barbur Blvd. overpass; reduced construction impacts; potentially reduced property impacts; potential bicycle and pedestrian facilities Reasons for opposition: concerns about impacts (including traffic, residences, businesses, Woods Memorial Natural Area, water quality, noise and vibration, visual); concerns that it would not address existing safety, pedestrian and bicycling issues
<p>Refinement 3, I-5 Undercrossing (also in Segment C): supported by 0 commenters, opposed by 1 commenter</p> <ul style="list-style-type: none"> Reasons for opposition: potential impacts to roads and access to PCC-Sylvania campus
<p>Refinement 4, Barbur Undercrossing (also in Segment C): supported by 6 commenters, opposed by 14 commenters</p> <ul style="list-style-type: none"> Reasons for support: faster travel times; lower costs; better station spacing; reduced noise and visual impacts; potential for better bicycle and pedestrian improvements across I-5; reduced traffic impacts by using SW 70th Ave. instead of SW 68th Ave.; proximity to businesses on Pacific Hwy. (99W) and residences north of Pacific Hwy. Reasons for opposition: wetland impacts; impacts to businesses on Pacific Hwy.; perceived lack of public process around Refinement 4; concerns about travel time, cost and ridership projections; increased visual impacts at SW 68th Ave.; farther from future high density housing identified in <i>Tigard Triangle Strategic Plan</i>
Segment C: Tigard and Tualatin
<p>Refinement 5, Elmhurst: supported by 17 commenters, opposed by 5 commenters</p> <ul style="list-style-type: none"> Reasons for support: faster travel times; fewer impacts to businesses; less impact to on-street parking and freight traffic; would avoid impacts to apartment complex Reasons for opposition: not enough consideration in Draft EIS; traffic impacts; prefer routing through existing commercial/retail areas; impacts to existing housing; tree removals; property impacts; farther from residences and businesses in the southern part of Tigard Triangle
<p>Refinement 6, Tigard Transit Center East of Hall: supported by 14 commenters, opposed by 4 commenters</p> <ul style="list-style-type: none"> Reasons for support: fewer residential displacements; faster travel times; lower costs; would avoid disruption to downtown Tigard area; reduced wetland impacts; fewer traffic impacts Reasons for opposition: farther from residences; less beneficial to downtown Tigard

Note: EIS = Environmental Impact Statement; I-5 = Interstate 5; PCC = Portland Community College.

Property Impacts

Some commenters expressed concerns about property impacts in general, in some cases specifying concerns about the overall level of residential displacements, business displacements or both. Some commenters were concerned about impacts to their own residences and businesses, or their own commercial or residential rental properties. Some commenters raised concerns about impacts to certain properties due to their perceived historic significance.

Specifically, some commenters expressed concerns about property impacts along Pacific Highway in Tigard related to Refinement 4, Barbur Undercrossing. Business owners expressed concerns about impacts to their properties, including acquisitions required for the 68th Station and the associated park and ride. Some comments were submitted in the form of a petition in opposition to Refinement 4, for which

signatures were gathered on paper and on Change.org. The petition was created by a manager of a Tigard business and circulated by Tigard businesses.

Many commenters expressed concerns about property impacts at the Bridgeport Station, specifically in opposition to impacts to the Village Inn, a restaurant located on the northeast corner of the SW Lower Boones Ferry Road and SW 72nd Avenue intersection at the time the Draft EIS was published. (The Village Inn subsequently announced its permanent closure in May 2020.) The Village Inn was anticipated to be displaced by all Segment C alignment alternatives to allow for bus bays adjacent to the Bridgeport Station. Commenters expressed a desire for the Village Inn to remain in operation at its current location, stating that it is a community focal point and gathering space. Some commenters suggested alternative locations and layouts for the station that would not impact the Village Inn.

Project Design

Some commenters expressed preferences about more detailed aspects of the design of the Project, including:

- **Bicycle and pedestrian facility designs and station access improvements.** Some commenters expressed general support, concerns or suggestions about bicycle and pedestrian improvements. Common themes included concerns that the bicycle and pedestrian facility designs shown in the Draft EIS should be improved, and support for specific improvements to bicycle and pedestrian facilities. Some of these specific improvements identified were part of the Draft EIS alignment alternatives or studied as station access improvements, while others were not studied in the Draft EIS.
- **SW Barbur Boulevard lane removal.** Some commenters voiced concerns that light rail would remove auto travel lanes on SW Barbur Boulevard.
- **Marquam Hill connection design.** Some commenters voiced a preference for either an elevator and bridge, an inclined elevator, or a tunnel and elevator option to connect Marquam Hill to the Gibbs Station. Some expressed a desire for extra care to be taken in the design of the connection on both ends, for whichever option is chosen, including creating safer crossings for pedestrians. Others were concerned about the impacts of a signalized crossing at SW Terwilliger Boulevard, including tree removal, visual impacts and traffic impacts. Still others expressed concerns about impacts to the historic synagogue property located adjacent to the proposed connection.
- **Park and rides.** Some commenters expressed concerns about traffic related to park and rides and commuters parking on neighborhood streets instead of at a park and ride, and a desire for larger or smaller park and rides, or park and rides at different locations. Other commenters suggested privatizing park and rides, including development on top of or instead of park and rides; building garages instead of surface parking; or spending project funds on bicycle or pedestrian improvements instead of park and rides.

Preferences for Alternatives Not Studied in the Draft EIS

Some commenters expressed preferences for the Project to pursue other transit modes, various roadway improvements instead of transit, or other alignments or destinations for light rail that were not studied in the Draft EIS:

- **Other transit modes.** Some commenters expressed a preference for the Project to pursue bus improvements, bus rapid transit or Westside Express Service (WES) Commuter Rail improvements instead of light rail.
- **Roadway improvements.** Some commenters expressed a preference that, instead of the light rail investment, the region spend funds on roadways, including on- and off-ramps, bridges, new or widened highways, or road repairs.
- **Other destinations.** Some commenters expressed a preference for serving different destinations than the one proposed in the Draft EIS, either through constructing the Project or by building a different project instead. These destinations included downtown Tualatin, Sherwood, Wilsonville, Newberg, Vancouver, Beaverton, Salem and Hillsboro.
- **Extended I-5 alignment.** Some commenters expressed a preference for an alignment running alongside or in the center median of I-5 for the length of the light rail line.
- **Light rail tunnels.** Some commenters expressed a preference for tunnel alignments serving Marquam Hill, Hillsdale and PCC-Sylvania.

Housing Affordability and Related Issues

Some commenters expressed concerns and suggestions related to potential indirect impacts of light rail on property values and rents, including:

- **Indirect impacts on housing affordability.** Some commenters expressed concerns that light rail would increase property values and rents, and that as a result it would displace existing tenants. Some commenters expressed fears that they personally would be displaced as a result of these potential impacts. Other commenters expressed concerns about the burden of these potential impacts on vulnerable populations, including communities of color, noncitizens and low-income households. Some commenters suggested strategies to prevent or mitigate these displacements, including preserving and constructing affordable housing, as described in the next paragraph; offering displaced residents “right of first refusal” to return to their communities when new development occurs; and prioritizing new affordable housing for people of color, seniors and low-income households. Some commenters also requested stronger protections for tenants and rental applicants.
- **Affordable housing preservation and construction.** Some commenters expressed a desire for project partners to preserve and construct affordable housing in the corridor, either as part of the light rail investment or in close coordination with it. Specific suggestions included building affordable housing on remnant parcels after project construction is complete, purchasing land in the corridor specifically for affordable housing, or protecting existing naturally occurring affordable housing.

- **Adequacy of Draft EIS analysis and mitigation measures.** Some commenters expressed concerns about the adequacy of the Draft EIS analysis related to housing, indirect and cumulative impacts, and environmental justice. Specific concerns included that the analysis focused too narrowly on direct displacements as a result of light rail, and did not consider indirect displacements as a result of real estate activity and property value changes, as discussed above. Commenters pointed towards the indirect displacement impacts of past transit investments on low-income households and communities of color. Some commenters expressed concerns that the mitigation measures proposed to address residential displacements would be inadequate, and that the Final EIS should include additional mitigation measures.
- **Related efforts to address housing affordability.** Some commenters referenced general support for related efforts to address housing affordability in the corridor, including the Southwest Corridor Equitable Housing Strategy, which is a joint effort between Portland and Tigard, as well as the broader Southwest Corridor Equitable Development Strategy, which Metro developed in collaboration with partners from the community and other agencies.

Other Common Comments

Other topics commonly raised by the general public included:

- **Draft EIS public involvement process.** Some commenters expressed concerns related to the length of the Draft EIS comment period, the notices that were provided to potentially affected residents, and media related to the comment period. In addition, some commenters expressed concerns that there was not enough time to evaluate or comment on the design refinements included in the Draft EIS, and that there was not a diverse pool of commenters.
- **Crime, safety and policing.** Some commenters expressed concerns about crime and safety, either on the train, at light rail stations or in surrounding neighborhoods. Some commenters also provided comments regarding policing, either on the train or in general.
- **Light rail ridership.** Some commenters expressed concerns with the ridership model and projections used to inform the Draft EIS. These comments included concerns that the projections from previous projects have overestimated ridership; that the No-Build Alternative projections predict growth in ridership while current TriMet ridership is declining; that projected light rail riders will not be new riders, but they are already using the bus lines in the corridor; and that new technologies, such as ride hailing apps and self-driving cars, will reduce ridership compared to the modeled projections. Some commenters expressed general distrust of the ridership projections in the Draft EIS without citing specific concerns.

7.4. Consideration of Draft EIS Comments

The Draft EIS comments were summarized and provided to project decision-makers, as described in Chapter 6. The sections below discuss several examples of ways that the Draft EIS comments informed the Preferred Alternative selection and refinements to project designs.

Preferred Alternative Decision

The Draft EIS comments were considered in the selection of the Preferred Alternative, including project partner staff's recommendation, the steering committee's recommendation and Metro Council's adoption.

The Preferred Alternative does not include two design refinements that had been part of the initial route proposal, largely due to concerns raised during the Draft EIS comment period:

- **Refinement 1, Barbur Woods East-Side Running.** This design refinement was removed from consideration based on public comments received, as well as a funding agreement that was reached after publication of the Draft EIS to support replacement of the existing SW Barbur Boulevard trestle bridges.
- **Refinement 2, Taylors Ferry I-5 Overcrossing.** Based on concerns raised about this design refinement during the Draft EIS comment period, the steering committee recommended further study of multiple route options in the Crossroads area. After further analysis and public engagement, as described in Chapter 6 and Appendix I, Preferred Alternative Selection and Project Refinements, this refinement was subsequently removed from further consideration.

For more information about the initial route proposal and the process of selecting and adopting the Preferred Alternative, see Appendix I.

Further Project Refinements

After the identification of the Preferred Alternative, the project designs were adjusted to avoid, minimize or otherwise mitigate adverse effects identified in the Draft EIS and the public comments whenever possible.

Examples of how the Project was altered in response to public comments include:

- The designs were adjusted in several locations to reduce property impacts, including to parks and historic properties, and to minimize business and residential displacements. These design changes included slightly shifting or narrowing project elements in constrained locations, such as narrower sidewalks and auto travel lanes on SW Barbur Boulevard north of SW Naito Parkway.
- The light rail structure over Interstate 405 (I-405) was extended south to cross over SW Sheridan Street and SW Caruthers Street (U.S. Highway 26) to avoid traffic impacts.
- The Marquam Hill Connection was refined to reduce impacts to Terwilliger Parkway.
- The Ross Island Bridgehead Reconfiguration was refined to avoid displacing a National University of Natural Medicine health clinic.
- The design of bicycle infrastructure along SW Barbur Boulevard was refined to use raised protected bicycle lanes instead of buffered bicycle lanes between SW Naito Parkway and the Barbur Transit Center.
- The Hunziker O&M Facility was reconfigured and shifted slightly to reduce floodplain impacts.
- The design of the Bridgeport Station relocated the bus bays to the south side of SW Lower Boones Ferry Road, on the ground floor of the proposed park and ride garage, in order to avoid the need to relocate

existing uses at the Village Inn property. This parcel is still anticipated to be partially or fully acquired for the Preferred Alternative. However, this impact would not affect the Village Inn restaurant; after publication of the Draft EIS, the restaurant closed permanently in May 2020.

See Appendix I for more information about these and other project refinements.

7.5. Responses to Draft EIS Comments

In Appendix J, this Final EIS contains all comments made during the public comment period, as well as responses to all substantive comments. All of the comments received were reviewed for the issues raised within them. Many comments raised multiple issues. Appendix J is organized as follows:

- **Appendix J1, Introduction to Draft EIS Comments and Responses**, provides an overview of the contents of Appendix J, including an index of Draft EIS comments and master responses to most of the commonly raised issues that are summarized in Section 7.3 above.
- **Appendix J2, Responses to Draft EIS Comments**, provides tables of all substantive Draft EIS comments along with individual responses for each comment. In many cases, the response to an individual comment contains a reference to the appropriate master response in Appendix J1. In other cases, a more detailed response is provided in addition to or instead of a reference to a master response. This appendix is organized by commenter affiliation type: tribe and agency, organization, business, petition and individual.
- **Appendix J3, Original Copies of Draft EIS Comments**, contains the comments in their original form of submission, such as emails, public hearing transcripts, petition forms and letters.

FTA, TriMet and Metro 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. For more information about correspondence with tribes and agencies, see Chapter 6, Community Participation, Agency Coordination and Required Permits, and Appendix E, Agency Coordination and Correspondence, of this Final EIS.

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